



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WAYNE COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-21803

Fac ID: 0285000366

DATE: 7/11/2006

East Ohio Gas Co. - Chippewa Compressor
Scott Hallam
1201 E. 55th St.
Cleveland, OH 44103

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 7/11/2006
Effective Date: 7/11/2006**

FINAL PERMIT TO INSTALL 02-21803

Application Number: 02-21803
Facility ID: 0285000366
Permit Fee: **\$400**
Name of Facility: East Ohio Gas Co. - Chippewa Compressor
Person to Contact: Scott Hallam
Address: 1201 E. 55th St.
Cleveland, OH 44103

Location of proposed air contaminant source(s) [emissions unit(s)]:
**17045 Galehouse Rd.
Doylestown, Ohio**

Description of proposed emissions unit(s):
NG fired compressor engine.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or

required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM10	4.34
VOC	4.16
NOx	16.03
CO	3.99

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
Caterpillar model G-3608-LE-TA, 2370 HP (16.02 MMBTU/hr), natural gas-fired, 4-stroke lean burn, reciprocating pipeline compressor engine controlled with an oxidation catalyst	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-11(B)(5)(b)
	OAC rule 3745-18-06(G)
	OAC rule 3745-21-07(B)
	OAC rule 3745-21-08(B)
	40 CFR Part 63, Subpart ZZZZ
	OAC rule 3745-17-07(A)(1)
OAC rule 3745-17-11(B)(5)(b)	

Issue

Emissions Unit ID: B009

Applicable Emissions
Limitations/Control
Measures

Particulate emissions (PE) from this emissions unit shall not exceed 0.99 lb/hr and 4.34 TPY.

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.95 lb/hr and 4.16 TPY.

Nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 3.66 lbs/hr and 16.03 TPY.

Carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.91 lb/hr and 3.99 TPY.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(5)(b), and 40 CFR Part 63, Subpart ZZZZ.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

PE shall not exceed 0.35 lb/MMBTU actual heat

input.

See section A.I.2.a below.

PE shall not exceed 0.062 lb/MMBTU actual heat input.

See section A.I.2.b below.

This emissions unit is exempt from this requirement pursuant to OAC rule 3745-18-06(A).

See section A.I.2.c below.

See section A.I.2.d below.

See section A.I.2.e below.

See sections A.I.2.f through A.I.2.j and A.II.2 through A.II.5 below.

2. Additional Terms and Conditions

- 2.a** The requirement to comply with this PE limitation shall terminate on the date the U.S. EPA approves 0.062 lb/MMBTU actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.b** This PE limitation shall be effective and federally enforceable on the date the U.S. EPA approves this PE limitation as a revision to the Ohio SIP for particulate matter.
- 2.c** This emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.
- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.
On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
- 2.f** This emissions unit is subject to 40 CFR Part 63, Subpart ZZZZ-- National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE).
- 2.g** The permittee is subject to the following requirements specified in 40 CFR Part 63, Subpart A as listed in Table 8 of 40 CFR Part 63, Subpart ZZZZ:

Parts 63.1, 63.2, 63.3, 63.4, 63.5, 63.6(a), 63.6(b)(1)-(5), 63.6(b)(7), 63.6(c)(1) and (2), 63.6(c)(5), 63.6(e)(1), 63.6(e)(3), 63.6(f)(1)-(3), 63.6(g)(1)-(3), 63.6(i), 63.6(j), 63.7(a)(1)-(3), 63.7(b)(1) and (2), 63.7(c), 63.7(d), 63.7(e)(1)-(4), 63.7(f),

63.7(g), 63.7(h), 63.8(a)(1) and (2), 63.8(b)(1)-(3), 63.8(c)(1)-(4), 63.8(c)(6)-(8), 63.8(d), 63.8(e), 63.8(f)(1)-(6), 63.8(g), 63.9(a), 63.9(b)(1)-(5), 63.9(c), 63.9(d), 63.9(e), 63.9(g)(1), 63.9(g)(3), 63.9(h)(1)-(6), 63.9(i), 63.9(j), 63.10(a), 63.10(b)(1), 63.10(b)(2)(i)-(xiv), 63.10(b)(3), 63.10(c), 63.10(d)(1) and (2), 63.10(d)(4) and (5), 63.10(e)(1) and (2)(i), 63.10(e)(3), 63.10(f), 63.12, 63.13, 63.14, and 63.15.

- 2.h Beginning upon initial startup, the permittee shall reduce CO emissions by 93 percent or more at 100% load plus or minus 10%.
- 2.i Beginning upon initial startup, the permittee shall be in compliance with the requirements listed in A.I.2.h, A.II.2, and A.II.3 at all times, except during periods of startup, shutdown, and malfunction.
- 2.j Beginning upon initial startup, the permittee shall operate and maintain this emissions unit, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during startup, shutdown, and malfunction.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. Beginning upon initial startup, the permittee shall maintain the catalyst so that the pressure drop across the catalyst does not change by more than two inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst that was measured during the initial performance test.
3. Beginning upon initial startup, the permittee shall maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 degrees Fahrenheit and less than or equal to 1350 degrees Fahrenheit at all loads.
4. Beginning upon initial startup, during periods of startup, shutdown, and malfunction, the permittee shall operate in accordance with the startup, shutdown, and malfunction plan.
5. Consistent with 40 CFR Part 63.6(e) and 40 CFR Part 63.7(e)(1), deviations from the emission or operating limitations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to the Director's satisfaction that the emissions unit was operating in accordance with the startup,

shutdown, and malfunction plan.

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. Beginning upon initial startup, the permittee shall install, calibrate, operate, and maintain equipment to continuously monitor and record the catalyst inlet temperature while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). This shall be accomplished in accordance with the requirements in 40 CFR Part 63.8.
3.
 - a. Beginning upon initial startup, except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall monitor for inlet temperature to the catalyst bed continuously at all times that the stationary RICE is operating.
 - b. Beginning upon initial startup, data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities may not be used in data averages and calculations used to report emission or operating levels. However, all the valid data collected during all other periods must be used.
4. Beginning upon initial startup the permittee shall:
 - a. Collect the catalyst inlet temperature data continuously according to A.III.3.a;
 - b. reduce the data to 4-hour rolling averages within the operating limitations for the catalyst inlet temperature;
 - c. maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature (between 450 degrees and 1350 degrees Fahrenheit); and
 - d. measure the pressure drop across the catalyst once per month at 100 percent load plus or minus 10 percent and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the most recent performance test which demonstrated compliance.

5. The permittee shall keep the records below:
 - a. a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation, supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirement in 40 CFR Part 63.10(b)(2)(xiv) and A.IV.1 below;
 - b. the records in 40 CFR Parts 63.6(e)(3)(iii) through 63.6(e)(3)(v) related to startup, shutdown, and malfunction; and
 - c. records of performance tests and performance evaluations as required in 40 CFR Part 63.10(b)(2)(viii).
6. For each CPMS (Continuous Parameter Monitoring System), the permittee shall keep the records listed below:
 - a. records described in 40 CFR Parts 63.10(b)(2)(vi) through 63.10(b)(2)(xi); and
 - b. previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR Part 63.8(d)(3), if applicable.
7. The permittee shall keep the records required in A.III.4 above and in Table 6 of 40 CFR Part 63, Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies as specified in A.II.2 and A.II.3 above.
8. For all records kept in accordance to A.III.5 through A.III.7 above:
 - a. Records must be kept in a form suitable and readily available for expeditious review according to 40 CFR Part 63.10(b)(1).
 - b. As specified in 40 CFR Part 63.10(b)(1), each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
 - c. Each record must be kept readily accessible in hard copy or electronic form on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR Part 63.10(b)(1). The records may be kept off-site for the remaining 3 years.

IV. Reporting Requirements

1. The permittee shall submit an initial notification report within 120 days after the emissions unit becomes subject to this subpart. The initial notification shall include the following information:
 - a. the name and address of the owner or operator;
 - b. the address, i.e., the physical location of the affected source;
 - c. an identification of the relevant standard (NESHAP) that is the basis of the notification and the compliance date;
 - d. a brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant or a preliminary identification of each such point;
 - e. a statement of whether the affected source is a major source or an area source; and
 - f. the anticipated startup of the emissions unit following the issuance of the permit (or the date when construction or reconstruction was commenced if prior to the issuance of a permit).

A notification of the actual date of startup of the emissions unit shall be delivered (to the appropriate Ohio EPA District Office or local air agency) or postmarked within 15 calendar days following the startup date of the affected source.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit all of the notifications in 40 CFR Parts 63.7(b) and 63.7(c), 63.8(e), 63.8(f)(4) and 63.8(f)(6), 63.9(b) through 63.9(e), and 63.9(g) and 63.9(h) that apply to this emissions unit by the dates specified in 40 CFR Part 63, Subpart ZZZZ.
4. The permittee shall submit a Notification of Compliance Status according to 40 CFR Part 63.9(h)(2)(ii).
5. The permittee shall submit semiannual compliance reports.
 - a. The first semiannual compliance report shall cover the period beginning upon initial startup and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after initial startup. The first compliance report must be postmarked or delivered no later than July 31 or

January 31, whichever is the first date following the end of the first calendar half after initial startup.

- b. Each subsequent compliance report must cover the semiannual report period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

6. The compliance report must contain the following information:
 - a. the company name and address;
 - b. a statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report;
 - c. date of report and beginning and ending dates of the reporting period;
 - d. if there was a startup, shutdown, or malfunction during the reporting period, the compliance report must include the information in 40 CFR Part 63.10(d)(5)(i);
 - e. if there are no deviations from any emission or operating limitations, a statement that there were no deviations from the emission or operating limitations during the reporting period;
 - f. if there were no periods during which the CPMS was out-of-control, as specified in 40 CFR Part 63.8(c)(7), a statement that there were no periods during which the CPMS was out-of-control during the reporting period; and
 - g. for each deviation from an operating limitation, the following information must be included in the compliance report:
 - i. the date and time that each malfunction started and stopped;
 - ii. the date, time, and duration that each CPMS was inoperative, except for zero (low-level) and high-level checks;
 - iii. the date, time, and duration that each CPMS was out-of-control, including the information in 40 CFR Part 63.8(c)(8);
 - iv. the date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period;
 - v. a summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period;
 - vi. a breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes;
 - vii. a summary of the total duration of CPMS downtime during the reporting period, and the total duration of CPMS downtime as a percent of the total

- operating time of the emissions unit at which the CPMS downtime occurred during that reporting period;
- viii. an identification of each parameter that was monitored at the emissions unit;
 - ix. a brief description of the emissions unit;
 - x. a brief description of the CPMS;
 - xi. the date of the latest CPMS certification or audit; and
 - xii. a description of any changes in CPMS, processes, or controls since the last reporting period.
7. The permittee must report all deviations as defined in Subpart ZZZZ of 40 CFR Part 63 in the semiannual monitoring report required by 40 CFR Part 70.6 (a)(3)(iii)(A) or 40 CFR Part 71.6(a)(3)(iii)(A). If the permittee submits a compliance report pursuant to Table 7 of Subpart ZZZZ of Part 63 along with, or as part of, the semiannual monitoring report required by 40 CFR Part 70.6(a)(3)(iii)(A) or 40 CFR Part 71.6(a)(iii)(A), and the compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submissions of a compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the permit authority.
8. The permittee must submit an immediate startup, shutdown, and malfunction report if actions addressing the startup, shutdown, or malfunction were inconsistent with the permittee's startup, shutdown, or malfunction plan. The report must contain actions taken for the event. The permittee must submit the report by fax or telephone within 2 working days after starting actions inconsistent with the plan. The permittee must also submit the information in 40 CFR Part 63.10(d)(5)(ii). This information must be submitted by letter within 7 working days after the end of the event unless the permittee made alternative arrangements with the Ohio EPA.

V. Testing Requirements

1. Compliance with the emission limitations specified in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PE from this emissions unit shall not exceed 0.99 lb/hr and 4.34 TPY.

Applicable Compliance Method:

The emission limitations were based upon the OAC rule 3745-17-11(B)(5)(b) rule limitation. Compliance with the hourly emission limitation shall be determined by multiplying the 0.062 lb/mmBtu emission factor by the 16.02 MMBTU/hr rating of the unit.

The annual emission limitation specified above was created by multiplying the hourly emission limitation by 8,760 hours/year and dividing by 2,000 lbs/ton; therefore, as long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation will be assumed.

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 0.95 lb/hr and 4.16 TPY.

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.118 lb/MMBTU and a typical minimal control efficiency of 50%. The emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-2 (7/00). Compliance with the hourly emission limitation shall be determined by multiplying the 0.118 lb/MMBTU emission factor by the 16.02 MMBTU/hr rating of the unit, and multiplying by (1-0.50), where 0.50 is the typical minimal control efficiency of the oxidation catalyst.

The annual emission limitation specified above was created by multiplying the hourly emission limitation by 8,760 hours/year and dividing by 2,000 lbs/ton; therefore, as long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation will be assumed.

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18 or 25/25A, as appropriate.

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c. Emission Limitation:

NO_x emissions from this emissions unit shall not exceed 3.66 lb/hr and 16.03 TPY.

Applicable Compliance Method:

The emission limitations were based upon emission factors supplied by the equipment manufacturer. Compliance with the hourly emission limitation shall be determined by multiplying the 0.7 g/BHP-hr emission factor by the 2370 BHP rating of the unit, and dividing by the conversion factor of 453.59 g/lb.

The annual emission limitation specified above was created by multiplying the hourly emission limitation by 8,760 hours/year and dividing by 2,000 lbs/ton; therefore, as long as compliance with the hourly emission limitation is maintained, compliance with the annual emission limitation will be assumed.

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

d. Emission Limitation:

CO emissions from this emissions unit shall not exceed 0.91 lb/hr and 3.99 TPY.

Applicable Compliance Method:

The emission limitations were based upon emission factors supplied by the equipment manufacturer. Compliance with the hourly emission limitation shall be determined by multiplying the 2.5 g/BHP-hr emission factor by the 2370 BHP rating of the unit, dividing by the conversion factor of 453.59 g/lb, and multiplying by (1-0.93), where 0.93 is the control efficiency of the oxidation catalyst.

The annual emission limitation specified above was created by multiplying the hourly emission limitations by 8,760 hours/year and dividing by 2,000 lbs/ton; therefore, as long as compliance with the hourly emission limitations is maintained, compliance with the annual emission limitations will be assumed.

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

f. Emission Limitation:

PE shall not exceed 0.35 lb/MMBTU actual heat input.

Applicable Compliance Method:

Compliance may be based upon an emission factor of 7.71 E-05 lb/MMBTU. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-2 (7/00).

If required, the permittee shall demonstrate compliance with this emission limitation through an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g. Emission Limitation:

PE shall not exceed 0.062 lb/MMBTU of actual heat input.

Applicable Compliance Method:

Compliance may be based upon an emission factor of 7.71 E-05 lb/MMBTU. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-2 (7/00).

If required, the permittee shall demonstrate compliance with this emission limitation through an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

2. The permittee shall conduct, or have conducted, performance testing for this emissions unit in accordance with the following requirements:
 - a. The initial performance testing shall be conducted within 180 days of initial startup. Subsequent performance tests shall be conducted semiannually. After demonstrating compliance for two consecutive tests, the frequency of subsequent tests may be reduced to annually. If the results of any subsequent

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annual performance test indicate that the emissions unit is not in compliance with the CO emission limitation, or if there is a deviation from any operating limitation, semiannual performance tests must be resumed.

- b. The permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in 40 CFR Part 63.7(b)(1).
- c. The performance testing shall be conducted to determine the CO reduction across the control equipment; to establish the pressure drop, in inches of water, across the catalyst; and to document that the catalyst inlet temperature is between 450 degrees F and 1350 degrees F.
- d. When the catalyst is changed, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the permittee reestablishes the values of the operating parameters, the permittee must also conduct a performance test to demonstrate that the required emission limitation applicable to this emissions unit is met.

3. The testing shall be conducted as follows:
 - a. Measure the O₂ at the inlet and outlet of the control device using a portable CO and O₂ analyzer according to ASTM D6522-00 (incorporated by reference, see 40 CFR 63.14). Measurements to determine O₂ must be made at the same time as the measurements for CO concentration. Methods 3A and 10 may also be used as options to ASTM D6522-00.
 - b. Measure the CO at the inlet and outlet of the control device using a portable CO and O₂ analyzer according to ASTM D6522-00 (incorporated by reference, see 40 CFR 63.14). The CO concentration must be at 15 percent O₂, dry basis. Methods 3A and 10 may also be used as options to ASTM D6522-00.

NOTE: A copy of ASTM D6522-00 may be obtained from at least one of the following addresses: American Society for Testing and Materials, 100 Barr Harbor Drive, Post Office Box C700, West Conshohocken, PA 19428-2959, or ProQuest, 300 North Zeeb Road, Ann Arbor, MI 48106.

4. Each performance test must be conducted according to the requirements in 40 CFR Part 63.7(e)(1) and under the specific conditions in section A.V.3 above. The test must be conducted at any load conditions within plus or minus 10 percent of 100 percent load.
5. Performance tests may not be conducted during periods of startup, shutdown, or malfunction, as specified in 40 CFR Part 63.7(e)(1).
6. Three separate test runs must be conducted for each performance test requested in this section, as specified in 40 CFR Part 63.7(e)(3). Each test run must last at least one hour.
7. The following equation must be used to determine compliance with the percent reduction requirement:

$$((C_i - C_o) / C_i) \times 100 = R$$

where:

C_i = concentration of CO at the control device inlet;

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C_o = concentration of CO at the control device outlet; and

R = percent reduction of CO emissions.

8. The CO concentrations at the inlet and outlet of the control device must be normalized to a dry basis and to 15 percent oxygen, or an equivalent percent carbon dioxide. If pollutant concentrations are to be corrected to 15 percent oxygen and carbon dioxide concentration is measured in lieu of oxygen concentration measurement, a carbon dioxide correction factor is needed. Calculate the carbon dioxide correction factor as described in sections A.V.8.a through A.V.8.c below.

- a. Calculate the fuel-specific F_o value for the fuel burned during the test using values obtained from Method 19, section 5.2, and the following equation:

$$F_o = 0.209 F_d / F_c$$

where:

F_o = fuel factor based on the ratio of oxygen volume to the ultimate carbon dioxide volume produced by the fuel at zero percent excess air;

0.209 = fraction of air that is oxygen, percent/100;

F_d = ratio of the volume of dry effluent gas to the gross calorific value of the fuel from Method 19, dsm cubed/J (dscf/MMBTU); and

F_c = ratio of the volume of carbon dioxide produced to the gross calorific value of the fuel from Method 19, dsm cubed/J (dscf/MMBTU).

- b. Calculate the carbon dioxide correction factor for correcting measurement data to 15 percent oxygen as follows:

$$X_{co2} = 5.9 / F_o$$

where:

X_{co2} = carbon dioxide correction factor, percent; and

5.9 = 20.9 percent oxygen - 15 percent oxygen, the defined oxygen correction value, percent.

- c. Calculate the nitrogen oxides and sulfur dioxide gas concentrations adjusted to 15 percent oxygen using carbon dioxide as follows:

$$C_{adj} = C_d (X_{co2} / \text{percent carbon dioxide})$$

where:

percent carbon dioxide = measured carbon dioxide concentration measured, dry basis, percent.

9. The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report: the engine model number, the engine manufacturer, the year of purchase, the manufacturer's site-rated brake horsepower, the ambient temperature, the pressure, and the humidity during the performance test, and all assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained. If measurement devices such as flow meters, kilowatt meters, beat analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accuracy in percentage of true value must be provided.
10. The permittee shall submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to 40 CFR Part 63.10(d)(2).
11. The permittee has demonstrated initial compliance with the requirements in Subpart ZZZZ of 40 CFR Part 63 if:
 - a. the average reduction of emissions of CO determined from the initial performance test is equal to or greater than the required CO percent reduction (93 percent);
 - b. a CPMS (continuous parametric monitoring system) to continuously monitor the catalyst inlet temperature according to the requirements in 40 CFR Part 63.6625(b) has been installed;
 - c. the catalyst pressure drop and catalyst inlet temperature during the initial performance test was recorded; and
 - d. the Notification of Compliance Status containing the results of the initial compliance demonstration have been submitted according to the requirements in 40 CFR Part 63.6645.

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VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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