Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

2/22/2012

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.

Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: East Ohio Gas - Robinson Station
Facility ID: 1576001799
Permit Type: Renewal
Permit Number: P0106255

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Canton City Health Department

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Ohio | Environmental Protection Agency

# PROPOSED

# Division of Air Pollution Control
# Title V Permit
for
East Ohio Gas - Robinson Station

| | |
|---|---|
| Facility ID: | 1576001799 |
| Permit Number: | P0106255 |
| Permit Type: | Renewal |
| Issued: | 2/22/2012 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
East Ohio Gas - Robinson Station

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# Authorization

Facility ID: 1576001799
Facility Description: natural gas compressor station utilizing gas turbines and IC engines for storage of NG underground.
Application Number(s): A0039190, A0042908
Permit Number: P0106255
Permit Description: Renewal Title V permit for Robinson Compressor Station natural gas (NG) storage facility. This station has two emergency IC engines to operate emergency power generators, and four Cooper-Bessemer IC engines and two Solar turbines which each operate a compressor to store NG underground. This permit also incorporates recent TVPTIs and 40 CFR Part 63, Subpart ZZZZ, which applies to all 6 IC engines.
Permit Type: Renewal
Issue Date: 2/22/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0101052

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

East Ohio Gas - Robinson Station
5433 West Blvd
Canton, OH 44718

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Canton City Health Department. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

*(Authority for term: ORC 3704.036(A))*

## *2.* Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

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 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.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Canton City Health Department.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. 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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

(1) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## 11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## 12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

## 13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

(1) 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.

(2) 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 paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**16. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

**17. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11))*

**24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**25. Records Retention RequirementsUnder State Law Only**

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.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

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.

*(Authority for term: OAC rule 3745-77-01(C))*

**29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

# B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21and/or 40 CFR Part 60 or 63:

   a) None.

3. The following emissions units in this permit are subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart ZZZZ, Maximum Achievable Control Standards (MACT): P001, P002 P003, P004, P009, and P010. The complete NESHAP/MACT requirements, including the NESHAP/MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Canton Local Air Agency (Canton LAA).

4. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

# C. Emissions Unit Terms and Conditions

**1. P005, Turbine #1, Unit 4805.2**

**Operations, Property and/or Equipment Description:**

Turbine #1, Unit 4805.2, Solar Centaur Model 40-4700S, natural gas-fired lean-burn regenerative cycle, 4700 HP rated power output, and 41.62 MMBtu/hr rated heat capacity input. This turbine drives a NG compressor unit 4805 for underground NG storage during non-winter months. This turbine was upgraded in the year 2009 by adding SoLoNOx burners which increased the horsepower from 3730 to 4700, increased the heat input from 29 MMBtu/hr to 41.62 MMBtu/hr and decreased the NOx emissions from 66.2 TPY to 30.5 TPY.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI P0108902 issued 11/22/2011) | 7.0 lbsNOx/hr.<br>30.4 tons NOx/yr.<br>5.0 lbs CO/hr.<br>22.1 tons CO/yr.<br><br>See c)(1) |
| b. | OAC rule 3745-31-05(A)(3)(b) | The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions, SOx emissions, and PE from this air contaminant source since the uncontrolled potential to emit for each of these pollutants is less than ten tons per year. |
| c. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack servicing this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| d. | OAC rule 3745-17-11(B)(4) | Particulate emissions (PE) shall not exceed 0.040 lb/MMBtu of actual heat input. |

| | | |
|---|---|---|
| e. | OAC rule 3745-18-06(F) | Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the limitation specified by this rule during any calendar day in which natural gas is the only fuel burned. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall only fire pipeline quality natural gas as fuel in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-18-06(A) and PTI P0108902]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee fires a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel fired in this emissions unit.

(2) All records maintained for this emissions unit may be retained at an off-site location as long as the records are readily available for inspection.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0108902]

e) Reporting Requirements

(1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for Terms: OAC rule 3745-77-07(C)(1) and PTI P0108902]

f) Testing Requirements

(1) Compliance with the Emission Limitations and/or Control Requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

7.0 lbsNOx/hr
30.4 tons NOx/yr

5.0 lbs CO/hr
22.1 tons CO/yr

Applicable Compliance Method:

Compliance with the hourly allowable emission limitations for NOx and CO shall be demonstrated based on vendor supplied emission factors of 0.167 lbNOx/MMBtu and 0.121 lb CO/MMBtu. The hourly allowable emission state was calculated by multiplying the vendor supplied emissions factors by the maximum rate heat input of 41.62 MMBtu/hr. The annual tons per year emission limitations for NOx and CO are based on the maximum potential to emit by multiplying the hourly emission state by 8760 hours per year and dividing by 2000 pound per ton.

If required, compliance with the hourly emission limitations for NOx and CO shall be demonstrated by emission tests performed using an approved US EPA method(s) specified in 40 CFR Part 60, Subpart A and section f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0108902]

b. Emissions limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated utilizing visible particulate emission observations performed in accordance with methods and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0108902]

c. Emissions limitation:

Particulate Emissions (PE) shall not exceed 0.040 lb/MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission testing performed in accordance with methods and procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1), andPTI P0108902]

(2) The permittee shall conduct emissions testing for this emissions unit in accordance with the following requirements:

a. If requested by Ohio EPA, emissions testing shall be conducted at or near maximum heat input and any other heat input level determined to demonstrate worse case emissions of CO and NOx. Additional testing may be required at various operating loads. The need for additional testing shall be determined at the time the ITT is submitted as specified in section c. below. The performance testing shall be conducted in accordance with 40 CFR Part 60.8.

b. The permittee shall conduct emissions testing to demonstrate compliance with the lb/MMBtu limitation for the lb/hr. NOx and CO limitations specified in section b) above as follows:

i. Testing to be conducted in accordance with US EPA Method 7E or an alternative US EPA method from 40 CFR Part 60, Appendix A that has been approved by the Director, Ohio EPA and the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

ii. Testing to be conducted in accordance with US EPA Method 10B or an alternative US EPA method from 40 CFR Part 60, Appendix A that has been approved by the Director, Ohio EPA and the CCHD, APCD.

c. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test (ITT)" notification to the CCHD, APCD. The ITT shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person conducting the tests. Failure to submit such a notification for review and approval at least 30 days prior to the test may result in the Canton local air agency's refusal to accept the results of the emission test(s).

d. Personnel from the CCHD, APCD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

e. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) and submitted to the CCHD, APCD within 30 days following completion of the test(s)

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0108902]

g) Miscellaneous Requirements

(1) None.

**2. P006, Turbine #2, Unit 4806**

**Operations, Property and/or Equipment Description:**

Turbine #2, Unit 4806, Solar Centaur Model T4002, natural gas-fired lean-burn simple cycle, 3830 HP rated power output, and 36.8 MMBtu/hr rated heat capacity input. This turbine drives a NG compressor unit 4806 for NG storage underground during non-winter months.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI 15-01187 issued 03/19/1997) | Particulate emissions (PE) shall not exceed 1.47 lbs/hr and 4.94 tpy.<br><br>Nitrogen oxides (NOx) emissions shall not exceed 21.11 lbs/hr and 71.19 tpy.<br><br>Carbon monoxide (CO) emissions shall not exceed 6.2 lbs/hr and 20.85 tpy.<br><br>Compliance with this rule also includes compliance with OAC rule 3745-17-07(A).<br><br>See c)(1) and (2) below. |
| b. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| c. | OAC rule 3745-17-11(B)(4) | The emission limitation specified by this applicable rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| d. | OAC rule 3745-18-06(F) | Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the emission limitation specified by this rule during any calendar day in which natural gas is the only fuel burned. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall only burn pipeline quality natural gas as fuel in this emissions unit.

(2) The maximum annual natural gas usage rate for this emissions unit shall not exceed 248 million cubic feet per rolling, 12-month period.

[Authority for Terms: OAC rule 3745-77-07(A)(1) and PTI 15-01187]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records:

a. the amount of natural gas employed in this emissions unit, in million cubic feet; and

b. the rolling, 12-month summation of the amount of natural gas employed in this emissions unit, in million cubic feet.

[Authority for Terms: OAC rule 3745-77-07(C)(1) and PTI 15-01187]

(2) For each day during which the permittee fires a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel fired in this emissions unit.

[Authority for Terms: OAC rule 3745-77-07(C)(1)and PTI 15-01187]

(3) All records maintained for this emissions unit may be retained at an off-site location as long as the records are readily available for inspection.

[Authority for Terms: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired in this emissions unit. Each report shall be submitted with 30 days after the deviation occurs.

[Authority for Term: OAC 3745-77-07(C)(1) and PTI 15-01187]

(3) The permittee shall submit annual reports that specify the amount of natural gas employed (in mmcf) by month and year in this emissions unit and the total particulate, NOx, and CO emissions for this emissions unit for the previous calendar year. The reports shall be submitted to the Canton City Health Department, Division of Air Pollution Control by February 15 of each year.

[Authority for Terms: OAC rule 3745-77-07(C)(1) and PTI 15-01187]

f) Testing Requirements

(1) Compliance with the Emission Limitations and/or Control Requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Particulate Emissions (PE) shall not exceed 1.47 lbs/hr and 4.94 tpy.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the particulate emission factor of 0.0019 lb/MMBtu from AP-42, 5th Edition, Compilation of Air Pollution Emission Factors, Chapter 3, Table 3.1-2a (4/00) by the emissions unit's maximum rated heat input capacity of 36.8 MMBtu/hr.

If required, compliance with the hourly emission limitation may be demonstrated by emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the annual emissions limitation shall be demonstrated by multiplying the particulate emission factor of 0.0019 lb/MMBtu from AP-42, 5th Edition, Compilation of Air Pollution Emission Factors, Chapter 3, Table 3.1-2a (4/00) by the heat content of the natural gas (1000 Btu/cubic foot), and by the actual natural gas fuel usage rate from section d)(1) above, and then dividing by 2,000 lbs/ton.

[Authority for Terms: OAC rule 3745-77-07(C)(1) and PTI 15-01187]

b. Emission Limitations:

Nitrogen Oxides (NOx) emissions shall not exceed 21.11 lbs/hr and 71.19 tpy.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the NOx emission factor of 0.521 lb/MMBtu by the emissions unit's maximum rated heat input capacity for 36.8 MMBtu/hr. The NOx emission factor was obtained from the Alternative Control Techniques Document (NOx Emissions from Stationary Gas Turbines, EPA-453/R-93-007) for a Solar Centaur turbine.

If required, compliance with the hourly emission limitation shall be demonstrated by emissions tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

Compliance with the annual emission limitation shall be demonstrated by multiplying the NOx emission factor of 0.521 lb/MMBtu from the Alternative Control Techniques Document (NOx Emissions from Stationary Gas Turbines, EPA-453/R-93-007) for a Solar Centaur turbine by the heat content of the natural gas (1000 Btu/cubic foot), and by the actual natural gas fuel usage rate from section d)(1) above, and then dividing by 2,000 lbs/ton.

[Authority for Terms: OAC rule 3745-77-07(C)(1) and PTI 15-01187]

c. Emission Limitations:

Carbon Monoxide (CO) emissions shall not exceed 6.2 lbs/hr and 20.85 tpy.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the CO emission factor of 0.082 lb/MMBtu by the emissions unit's maximum rated heat input capacity of 36.8 MMBtu/hr. The CO emission factor was obtained from AP-42, 5th Edition, Compilation of Air Pollution Emission Factors, Chapter 3, Table 3.1-1 (4/00).

If required, compliance with the hourly emission limitation shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the annual emission limitation shall be demonstrated by multiplying the CO emission factor of 0.082 lb/MMBtu from AP-42, 5th Edition, Compilation of Air Pollution Emission Factors, Chapter 3, Table 3.1-1 (4/00) by the heat content of the natural gas (1000 Btu/cubic foot), and by the actual natural gas fuel usage rate from section d)(1) above, and then dividing by 2,000 lbs/ton.

[Authority for Terms: OAC rule 3745-77-07(C)(1) and PTI 15-01187]

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1), and PTI 15-01187]

g) Miscellaneous Requirements

(1) None.

**3. P009, Aux. Generator #1**

**Operations, Property and/or Equipment Description:**

Emergency Waukesha engine, Model 6WAKBU, 183 HP rated power output, maximum rated heat input capacity of 2.02 MMBtu/hr, natural gas-fired, spark-ignition, 4-stroke, rich-burn, small bore, reciprocating internal combustion engine (RICE), which drives an emergency auxiliary power generator #1 (old Z009).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| b. | OAC rule3745-17-11(B)(5)(a) | Particulate emissions (PE) shall not exceed 0.310 lb/MMBtu of actual heat input for small RICE less than or equal to 600 HP. |
| c. | OAC rule 3745-18-06(G) | Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the emission limitation specified by this rule during any calendar day in which natural gas is the only fuel burned.<br><br>Pursuant to OAC rule 3745-18-06(B), this emissions unit is exempt from the emission limitation specified by this rule because the rated heat input capacity is less than 10 MMBtu/hr total rated capacity. |
| d. | 40 CFR Part 63 Subpart ZZZZ<br><br>(40 CFR 63.6580 to 63.6675)<br><br>In accordance with 40 CFR 63.6585, | This existing, natural gas, emergency stationary 4SRB, spark ignition, reciprocating internal combustion engine (RICE), located at an area source of hazardous air pollutants (HAPs), shall |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | this emissions unit is a stationary reciprocating internal combustion engine (RICE) subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. | meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than October 19, 2013.<br><br>See b)(2)a. |
| e. | 40 CFR 63.6603(a)<br><br>Table 2d #5 to Subpart ZZZZ | By 10/19/13, comply with the maintenance / operational requirements from the NESHAP for emergency existing area source 4SRB SI RICE. |
| f. | 40 CFR 63.1 - 15<br><br>(40 CFR 63.6665) | Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to ZZZZ. |

(2) Additional Terms and Conditions

a. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6595(a)(1) | The compliance date for Part 63 Subpart ZZZZ for existing SI RICE at an area source is 10/19/13. |
| Applicable Tables from Part 63, Subpart ZZZZ | Compliance requirements in Table 2d #5; continuous compliance in Table 6 #9; general provision from Subpart A in Table 8. |
| 40 CFR 63.6603(a) | Maintain compliance with operational limitations in Table 2d #5 (inspection and maintenance requirements) to Part 63, Subpart ZZZZ. |
| 40 CFR 63.6640(a) | Demonstrate continuous compliance with the requirements of Table 2d #5 according to the methods specified in Table 6 #9 to Part 63, Subpart ZZZZ. |
| 40 CFR 63.6665 | Meet all of the general provisions of Subpart A, from Section 63.1 through 63.15, that apply* to the SI RICE, as identified in Table 8 to Subpart ZZZZ.<br><br>[*Per 40 CFR 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).] |

c) Operational Restrictions

(1) The permittee shall only fire pipeline quality natural gas in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

(2) Following the compliance date of the NESHAP, 10/19/13, unless meeting the requirements of 40 CFR 63.6625(j), the permittee shall change the oil and filter every 500 hours of operation or annually, whichever comes first; shall inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first; and shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace them as necessary. A log shall be maintained for the hours of operation between each oil, filter, and spark plug change and the date of each required inspection.

[Authority for Term: 40 CFR 63.6603(a), 40 CFR 63.6625(j), and Part 63, Subpart ZZZZ Table 2d #5 and Table 6 #9]

(3) The stationary SI RICE is being permitted as an emergency engine and therefore it can only be operated during emergency situations and required testing and maintenance and must comply with the requirements specified under 40 CFR 63.6640(f)(1), which include the following:

a. There is no time limit on the use of emergency stationary RICE in emergency situations.

b. The emergency stationary RICE may operate for the purpose of maintenance checks and readiness testing, as specified in 40 CFR 63.6640(f)(1)(ii), up to 100 hours per year

c. The emergency stationary RICE may operate for the purpose of non-emergency situations, as specified in 40 CFR 63.6640(f)(1)(iii), up to 50 hours per year, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing listed in b. above.

[Authority for Term: 40 CFR 63.6640(f) and the definition in 40 CFR 63.6675]

(4) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6605 | General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times. |
| 40 CFR 63.6625(e) | Operate & maintain RICE according to mfg. instructions and develop a facility maintenance plan for the RICE that meets the requirements of Subpart ZZZZ Table 2d #5. |
| 40 CFR 63.6625(h) | Minimize idle and startup time, not to exceed 30 minutes. |
| 40 CFR 63.6625(j) | Oil analysis program, option to extend the oil change frequency. |
| 40 CFR 63.6640(f) | Operating hours restrictions – See c)(3) above. |

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee fires a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel fired in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6625(f) | Permittee must install a non-resettable hour meter if one is not already installed. |
| 40 CFR 63.6635 | Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels. |
| 40 CFR 63.6655(a) | Keep records of: (1) each notification and report submitted to comply with Subpart ZZZZ; (2) the occurrence and duration of each malfunction of the RICE; and (3) corrective actions taken during each period of malfunction to minimize emissions and restore normal operations. |
| 40 CFR 63.6640(a) and 40 CFR 63.6655(d) | Keep the records required in #9 of Table 6 to Subpart ZZZZ to demonstrate continuous compliance. |
| 40 CFR 63.6655(e)(3) | Records of maintenance and inspections conducted in order to demonstrate compliance with Table 2d and to demonstrate that the RICE was operated and maintained according to the facility maintenance plan. |
| 40 CFR 63.6655(f)(2) | Keep records of the hours of operation of the engine that is recorded through the non-settable hour meter. The records must document how many hours are spent for emergency and non-emergency operations separately, including what classified the operation as an emergency. |
| 40 CFR 63.6625(h) | Maintain a record of each idle and/or startup time that exceeded 30 minutes. |
| 40.CFR 63.6660 | Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1) |

(3) All records maintained for this emissions unit may be retained at an off-site location as long as the records are readily available for inspection.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for Terms: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6640(b); and OAC rule 3745-77-07(A)(3)(c)(iv) | Submit in the quarterly deviation report each instance in which the operational requirements in Table 2d were not met. |
| 40 CFR 63.6640(e) and OAC rule 3745-77-07(A)(3)(c)(iv) | Submit in the quarterly deviation report each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met. |
| 40 CFR 63.6640(f) and OAC rule 3745-77-07(A)(3)(c)(iv) | Include in the quarterly deviation report any record of operations where this engine exceed the operating hours restriction listed in c)(3) above |
| 40 CFR Part 63, Subpart ZZZZ, Table 2d Footnote 2 | Submit in the quarterly deviation report each instance where the management practices were not performed on schedule due to posing an unacceptable risk. |

f) Testing Requirements

(1) Compliance with the Emission Limitations and/or Control Requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

b. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.310 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.0095 lb/MMBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-3 (7/00).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

**4. P010, Aux. Generator #2**

**Operations, Property and/or Equipment Description:**

Emergency Caterpillar engine, Model 3412, 691 HP rated power output, maximum rated heat input capacity of 5.01 MMBtu/hr, natural gas-fired, spark ignition, 4-stroke lean-burn, large bore, reciprocating internal combustion engine (RICE), which drives an emergency auxiliary power generator #2 (old Z010).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| b. | OAC rule 3745-17-11(B)(5)(b) | Particulate emissions (PE) shall not exceed 0.062 lb/MMBtu of actual heat input for large RICE greater than 600 HP. |
| c. | OAC rule 3745-18-06(G) | Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the emission limitation specified by this rule during any calendar day in which natural gas is the only fuel burned.<br><br>Pursuant to OAC rule 3745-18-06(B), this unit is exempt from the emission limitation specified by this rule because the rated heat input capacity is less than 10 MMBtu/hr total rated capacity. |
| d. | 40 CFR Part 63 Subpart ZZZZ<br><br>(40 CFR 63.6580 to 63.6675)<br><br>In accordance with 40 CFR 63.6585, this emissions unit is a stationary reciprocating internal combustion | This existing, natural gas, emergency stationary 4SLB, spark ignition, reciprocating internal combustion engine (RICE), located at an area source of hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than October |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | engine (RICE) subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. | 19, 2013.<br><br>See b)(2)a. |
| e. | 40 CFR 63.6603(a)<br><br>Table 2d #5 to Subpart ZZZZ | By 10/19/13, comply with the maintenance / operational requirements from the NESHAP for emergency existing area source 4SLB SI RICE. |
| f. | 40 CFR 63.1 - 15<br><br>(40 CFR 63.6665) | Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to ZZZZ. |

(2) Additional Terms and Conditions

a. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6595(a)(1) | The compliance date for Part 63 Subpart ZZZZ for existing SI RICE at an area source is 10/19/13. |
| Applicable Tables from Part 63, Subpart ZZZZ | Compliance requirements in Table 2d #5; continuous compliance in Table 6 #9; general provision from Subpart A in Table 8. |
| 40 CFR 63.6603(a) | Maintain compliance with operational limitations in Table 2d #5 (inspection and maintenance requirements) to Part 63, Subpart ZZZZ. |
| 40 CFR 63.6640(a) | Demonstrate continuous compliance with the requirements of Table 2d #5 according to the methods specified in Table 6 #9 to Part 63, Subpart ZZZZ. |
| 40 CFR 63.6665 | Meet all of the general provisions of Subpart A, from Section 63.1 through 63.15, that apply* to the SI RICE, as identified in Table 8 to Subpart ZZZZ.<br><br>[*Per 40 CFR 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).] |

c) Operational Restrictions

(1) The permittee shall only fire pipeline quality natural gas in this emissions unit.

[Authority for Terms: OAC rule 3745-77-07(A)(1)]

(2) Following the compliance date of the NESHAP, 10/19/13, unless meeting the requirements of 40 CFR 63.6625(j), the permittee shall change the oil and filter every 500 hours of operation or annually, whichever comes first; shall inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first; and shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace them as necessary. A log shall be maintained for the hours of operation between each oil, filter, and spark plug change and the date of each required inspection.

[Authority for Term: 40 CFR 63.6603(a), 40 CFR 63.6625(j), and Part 63, Subpart ZZZZ Table 2d #5 and Table 6 #9]

(3) The stationary SI RICE is being permitted as an emergency engine and therefore it can only be operated during emergency situations and required testing and maintenance and must comply with the requirements specified under 40 CFR 63.6640(f)(1), which include the following:

a. There is no time limit on the use of emergency stationary RICE in emergency situations.

b. The emergency stationary RICE may operate for the purpose of maintenance checks and readiness testing, as specified in 40 CFR 63.6640(f)(1)(ii), up to 100 hours per year

c. The emergency stationary RICE may operate for the purpose of non-emergency situations, as specified in 40 CFR 63.6640(f)(1)(iii), up to 50 hours per year, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing listed in b. above.

[Authority for Term: 40 CFR 63.6640(f) and the definition in 40 CFR 63.6675]

(4) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6605 | General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times. |
| 40 CFR 63.6625(e) | Operate & maintain RICE according to mfg. instructions and develop a facility maintenance plan for the RICE that meets the requirements of Subpart ZZZZ Table 2d #5. |
| 40 CFR 63.6625(h) | Minimize idle and startup time, not to exceed 30 minutes. |
| 40 CFR 63.6625(j) | Oil analysis program, option to extend the oil change frequency. |
| 40 CFR 63.6640(f) | Operating hours restrictions – See c)(3) above. |

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee fires a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel fired in this emissions unit.

[Authority for Terms: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6625(f) | Permittee must install a non-resettable hour meter if one is not already installed. |
| 40 CFR 63.6635 | Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels. |
| 40 CFR 63.6655(a) | Keep records of: (1). each notification and report submitted to comply with Subpart ZZZZ; (2). the occurrence and duration of each malfunction of the RICE; and (3). corrective actions taken during each period of malfunction to minimize emissions and restore normal operations. |
| 40 CFR 63.6640(a) and 40 CFR 63.6655(d) | Keep the records required in #9 of Table 6 to Subpart ZZZZ to demonstrate continuous compliance. |
| 40 CFR 63.6655(e)(3) | Records of maintenance and inspections conducted in order to demonstrate compliance with Table 2d and to demonstrate that the RICE was operated and maintained according to the facility's maintenance plan. |
| 40 CFR 63.6655(f)(2) | Keep records of the hours of operation of the engine that is recorded through the non-settable hour meter. The records must document how many hours are spent for emergency and non-emergency operations separately, including what classified the operation as an emergency. |
| 40 CFR 63.6625(h) | Maintain a record of each idle and/or startup time that exceeded 30 minutes. |
| 40 CFR 63.6660 | Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1). |

(3) All records maintained for this emissions unit may be retained at an off-site location as long as the records are readily available for inspection.

[Authority for Terms: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for Terms: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6640(b); and OAC rule 3745-77-07(A)(3)(c)(iv) | Submit in the quarterly deviation report each instance in which the operational requirements in Table 2d were not met. |
| 40 CFR 63.6640(e) and OAC rule 3745-77-07(A)(3)(c)(iv) | Submit in the quarterly deviation report each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met. |
| 40 CFR 63.6640(f) and OAC rule 3745-77-07(A)(3)(c)(iv) | Include in the quarterly deviation report any record of operations where this engine exceed the operating hours restriction listed in c)(3) above |
| 40 CFR Part 63, Subpart ZZZZ, Table 2d Footnote 2 | Submit in the quarterly deviation report each instance where the management practices were not performed on schedule due to posing an unacceptable risk. |

f) Testing Requirements

(1) Compliance with the Emission Limitations and/or Control Requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

b. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.062 lb/MMBtu of actual heat input

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.0000771 lb/MMBtu. This emission factor is specified in USEPA 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 in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

## 5. P825, Facility-wide Fugitive VOCs and HAPs

**Operations, Property and/or Equipment Description:**

Facility-wide fugitive VOC and HAP emissions from connections, valves, open ended lines, and other components for the entire facility (old Z025), and including fugitives from four (4) transition roof vents from the IC engine building (old Z024).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | None | See (2)a. below. |

(2) Additional Terms and Conditions

a. Gas Research Institute emission factors were used to estimate total fugitive VOC emissions for the entire facility. A table containing the emissions unit component count summary and a table containing the fugitive VOC and HAP emission calculations are maintained by the permittee

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

## 6. Emissions Unit Group -Cooper-Bessemer Engines: P001, P002, P003 & P004

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P001 | Engine #1, Unit 4801, Cooper-Bessemer, Model GMV10-T,1350 HP rated power output, 11.5 MMBtu/hr rated heat input, natural gas-fired, spark ignition (SI), 2-stroke lean-burn, large bore reciprocating internal combustion engine (RICE), which drives compressor unit 4801 for NG underground storage during non-winter months. |
| P002 | Engine #2, Unit 4802, Cooper-Bessemer, Model GMV10-T,1350 HP rated power output, 11.5 MMBtu/hr rated heat input, natural gas-fired, spark ignition (SI), 2-stroke lean-burn, large bore reciprocating internal combustion engine (RICE), which drives compressor unit 4802 for NG underground storage during non-winter months. |
| P003 | Engine #3, Unit 4803, Cooper-Bessemer, Model GMV10-T,1350 HP rated power output, 11.5 MMBtu/hr rated heat input, natural gas-fired, spark ignition (SI), 2-stroke lean-burn, large bore reciprocating internal combustion engine (RICE), which drives compressor unit 4803 for NG underground storage during non-winter months. |
| P004 | Engine #4, Unit 4804, Cooper-Bessemer, Model GMV10-T,1350 HP rated power output, 11.5 MMBtu/hr rated heat input, natural gas-fired, spark ignition (SI), 2-stroke lean-burn, large bore reciprocating internal combustion engine (RICE), which drives compressor unit 4804 for NG underground storage during non-winter months. |

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-17-07(A) | Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. |
| b. | OAC rule 3745-17-11(B)(5)(b) | Particulate emissions (PE) shall not exceed 0.062 lb/MMBtu of actual heat input from large RICE greater than 600 HP. |

| | | |
|---|---|---|
| c. | OAC rule 3745-18-06(G) | Pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the emission limitation specified by this rule during any calendar day in which natural gas is the only fuel burned. |
| d. | 40 CFR Part 63 Subpart ZZZZ<br><br>(40 CFR 63.6580 to 63.6675)<br><br>In accordance with 40 CFR 63.6585, this emissions unit is a stationary reciprocating internal combustion engine (RICE) operating at an area source of HAP emissions and is subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. | Pursuant to 40 CFR 63.6595(a)(1), this existing, natural gas, stationary 2SLB, spark ignition (SI), reciprocating internal combustion engine (RICE), located at an area source of hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than October 19, 2013.<br><br>See b)(2)a. |
| e. | 40 CFR 63.6603(a)<br><br>Table 2d #6 to Subpart ZZZZ | By 10/19/13, comply with the maintenance / operational requirements from the NESHAP for non-emergency, non-black start, existing 2SLB area source SI RICE. |
| f. | 40 CFR 63.1 - 15<br><br>(40 CFR 63.6665) | Table 8 to Subpart ZZZZ of 40 CFR Part 63 – Applicability of General Provisions to ZZZZ. |

(2) Additional Terms and Conditions

a. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6595(a)(1) | The compliance date for Part 63 Subpart ZZZZ for existing SI RICE at an area source is 10/19/13. |
| Applicable Tables from Part 63, Subpart ZZZZ | Compliance requirements in Table 2d #6; continuous compliance in Table 6 #9; general provision from Subpart A in Table 8. |
| 40 CFR 63.6603(a) | Maintain compliance with operational limitations in Table 2d #6 (inspection and maintenance requirements) to Part 63, Subpart ZZZZ. |
| 40 CFR 63.6640(a) | Demonstrate continuous compliance with the requirements of Table 2d #6 according to the methods specified in Table 6 #9 to Part 63, Subpart ZZZZ. |

| | |
|---|---|
| 40 CFR 63.6665 | Meet all of the general provisions of Subpart A, from Section 63.1 through 63.15, that apply* to the SI RICE, as identified in Table 8 to Subpart ZZZZ.<br>[*Per 40 CFR 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).] |

c) Operational Restrictions

(1) The permittee shall only fire pipeline quality natural gas as fuel in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(A)(1)

(2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6605 | General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times. |
| 40 CFR 63.6625(e) | Operate & maintain RICE according to mfg. instructions and develop a facility maintenance plan for the RICE that meets the requirements of Subpart ZZZZ Table 2d #6. |
| 40.CFR 63.6625(h) | Minimize idle and startup time, not to exceed 30 minutes. |
| 40 CFR 63.6625(j) | Oil analysis program, option to extend the oil change frequency |

(3) Following the compliance date of the NESHAP, 10/19/13, unless meeting the requirements of 40 CFR 63.6625(j), the permittee shall: (a) change the oil and filter every 4,320 hours of operation or annually, whichever comes first; (b) shall inspect the spark plugs every 4,320 hours of operation or annually, whichever comes first; and (c) shall inspect all hoses and belts every 4,320 hours of operation or annually, whichever comes first, and replace them as necessary. A log shall be maintained for the hours of operation between each oil, filter, and spark plug change and the date of each required inspection.

[Authority for term: 40 CFR 63.6603(a), 40 CFR 63.6625(j), and 40 CFR Part 63, Subpart ZZZZ Table 2d #6]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee fires a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel fired in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall maintain a record of the natural gas burned in this RICE during each calendar year. The natural gas usage can be calculated at the end of each year using the best method available to estimate the annual throughput which might include, but shall not be limited to: readings from the facility's natural gas meter, the facility's natural gas bill, and/or the recorded or estimated hours of operation along with the manufacture's documentation on the maximum natural gas fuel flow rate.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart ZZZZ]

(3) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6635 | Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels. |
| 40 CFR 63.6655(a) | Keep records of: (1) each notification and report submitted to comply with Subpart ZZZZ; (2) the occurrence and duration of each malfunction of the RICE; and (3) corrective actions taken during each period of malfunction to minimize emissions and restore normal operations. |
| 40 CFR 63.6640(a) and 40 CFR 63.6655(d) | Keep the records required in #9 of Table 6 to Subpart ZZZZ to demonstrate continuous compliance. |
| 40 CFR63.6655(e)(3) | Records of maintenance and inspections conducted in order to demonstrate compliance with Table 2d #6 and to demonstrate that the RICE was operated and maintained according to the facility maintenance plan. |
| 40 CFR 63.6625(h) | Maintain a record of each idle and/or startup time that exceeded 30 minutes. |
| 40.CFR 63.6660 | Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1) |

(4) All records maintained for this emissions unit may be retained at an off-site location as long as the records are readily available for inspection.

[Authority for term: OAC 3745-77-07(C)(1)]

e) Reporting Requirements

(1) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been

approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for Terms: OAC rule 3745-77-07(C)(1)]

(3) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

| Applicable Rule | Requirement |
|---|---|
| 40 CFR 63.6640(b); and OAC rule 3745-77-07(A)(3)(c)(iv) | Submit in the quarterly deviation report each instance in which the operational requirements in Table 2d were not met. |
| 40 CFR 63.6640(e) and OAC rule 3745-77-07(A)(3)(c)(iv) | Submit in the quarterly deviation report each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met. |

f) Testing Requirements

(1) Compliance with the Emission Limitations and/or Control Requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minuteaverage, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1)]

b. 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 0.0384 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 3.2-1 (7/00) for $PM_{10}$ (filterable).

If required, compliance shall be demonstrated through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1)]

(g) Miscellaneous Requirements

(1) None.