



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
DEFIANCE COUNTY

Street Address:

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

Mailing Address:
Lazarus Gov. Center

Application No: 03-13543

DATE: 8/28/2001

ANR Pipeline Company
Lillian Woolley
500 Renaissance Center
Detroit, MI 48243

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$800 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA NWDO IN MI



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install
Terms and Conditions

Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 03-13543

Application Number: 03-13543
APS Premise Number: 0320010169
Permit Fee: **To be entered upon final issuance**
Name of Facility: ANR Pipeline Company
Person to Contact: Lillian Woolley
Address: 500 Renaissance Center
Detroit, MI 48243

Location of proposed air contaminant source(s) [emissions unit(s)]:

**State Route 66
Defiance, Ohio**

Description of proposed emissions unit(s):

Installation of two 122MMBtu/hr Turbines, Emergency Generator, and evaporator.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

ANR Pipeline Company

Facility ID: 0320010169

PTI Application: 03-13543

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Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and 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. 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.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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Facility ID: 0320010169

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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.

4. 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.

5. Termination of Permit To Install

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

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

7. Public Disclosure

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

8. Applicability

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

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9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	212.9
NOx	166.1
VOC	70.5
SO2	21.8
PE	28.2
Formaldehyde	0.8

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Issued

Facility ID: 0320010169

Emissions Unit ID: P012

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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PTI A

Emissions Unit ID: P012

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P012 - 122 MMBtu/hr NG fired compressor Turbine, Unit No. 1	OAC Rule 3745-31-05 (A)	40 CFR 52.21 OAC Rule 3745-31-10 through 3745-31-20
		OAC Rule 3745-17-07(A)
		OAC Rule 3745-18-06(F)
		OAC Rule 3745-17-11(B)(4)
		40 CFR Part 60, Subpart GG

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PTI A

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Applicable Emissions Limitations/Control Measures	
35 ppmvd nitrogen oxides (NOx) at 15% Oxygen	See A.I.2.c. See A.I.2.c. See A.I.2.d.
17.1 lbs NO _x /hr & 74.9 tons NO _x /yr	
2.4 lbs sulfur dioxide (SO ₂) /hr & 10.5 tons SO ₂ /yr	
22.6 lbs carbon monoxide (CO)/hr & 99.0 tons CO/yr	
3.2 lbs particulate emissions (PE)/hr & 14.0 tons PE/yr	
8.9 lbs Volatile Organic Compounds (VOC)/hr & 39.0 tons VOC/yr,	
0.1 lb formaldehyde/hr & 0.4 ton formaldehyde/yr	
visible particulate emissions shall not exceed 10 percent opacity as a six-minute average	
See A.I.2.b.	
74.9 tons NO _x , 99.0 tons CO, 39.0 tons VOC, and 14.0 tons PE per rolling 12-month period	
See A.I.2.a.	
See A.I.2.c.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

2.a Per the requirements of 40 CFR 52.21, the permittee is required to perform a Best Available Control Technology (BACT) review for NO_x, CO, PE/PM₁₀, and VOC. The emissions limits based on the BACT requirements are listed under OAC rule 3745-31-05(A)(3) above. The following determinations have been made for each pollutant:

PE-	Burning natural gas in an efficient combustion turbine. For this permit, it is assumed that all PE emissions are PM ₁₀ .
NO _x -	Use of DLN burners with a controlled rate of 35 ppmvd at 15% Oxygen.
CO-	Burning natural gas in an efficient combustion turbine.
VOC-	Burning natural gas in an efficient combustion turbine.

2.b The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20 and 40 CFR Part 52.21.

2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.d The emissions limits based on this applicable rule are less stringent than the limits established pursuant to OAC Rule 3745-31-05. Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.

II. Operational Restrictions

1. As specified in the permittee's PTI application, the maximum heat input rating of this emissions unit is 122 MM Btu/hr. This value corresponds to a maximum natural gas fuel flow of 132,900 scf/hr, with a lower heat value of 918 Btu/scf. The permittee shall operate this emissions unit within the parameters specified above, except for start-up and shut-down. Start-up and shut-down periods shall be defined as any time the unit is operating at less than 30 percent load. Start-up and shut-down periods shall not exceed the vendor recommendations for proper operation of the turbine.
2. The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 2 grains per 100 standard cubic feet.
3. During the first 12 month of operation following startup, the permittee shall be limited to the

Emissions Unit ID: P012

following emission limits for NOx and CO (including start-up and shut-down emissions):

Month(s)	Emission Limitations	
	NOx	CO
1	6.4	8.4
1-2	12.7	16.8
1-3	19.1	25.2
1-4	25.4	33.6
1-5	31.8	42.0
1-6	38.1	50.4
1-7	44.5	58.8
1-8	50.8	67.2
1-9	57.2	75.6
1-10	63.5	84.0
1-11	69.9	92.4
1-12	74.9	99.0

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit P012:
 - a. the natural gas usage rate, in million cubic feet;
 - b. the hours of operation;
 - c. the monthly emission rate* for PE, NOx, CO, and VOC;
 - d. during the first 12 calendar months of operation following startup, the cumulative emission rate for NOx, and CO, in tons; and
 - e. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for PE, NOx, CO, and VOC, in tons.

* The permittee shall use the most recent testing/emissions data available for each respective pollutant, in conjunction with the quantity of fuel and hours of operation recorded above to determine the monthly emissions. The emissions calculations shall include start-up and shutdown periods.

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall monitor and record the fuel flow for this emissions unit on a daily basis.

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4. The permittee shall maintain documentation on the sulfur contents and heat values of the fuels received as follows: ASTM D 2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels. The permittee shall determine the heat value of the fuels using ASTM method D240. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Ohio EPA, Central Office. The newest or most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used if they comply with the requirements specified in 40 CFR Part 60.13, or upon written approval by the Ohio EPA, Central Office. No sampling of the nitrogen content is necessary as long as the permittee exclusively burns natural gas in this emissions unit.
5. The frequency of the sulfur sampling by either the permittee or the supplier shall be such that it complies with following custom fuel sampling schedule:
 - a. twice monthly for six months;
If this sampling shows little variability and shows compliance with the sulfur content restriction, then -
 - b. Once per calendar quarter for six quarters;
If this sampling shows little variability and shows compliance with the sulfur content restriction, then -
 - c. semi-annually, during the first and third calendar quarters of the year.

Should any sulfur analysis indicate non-compliance with the sulfur content restriction, or if there is a change in the fuel supplier or the fuel supply, the sulfur monitoring shall be conducted weekly while the custom fuel sampling schedule is being re-examined by the Ohio EPA, NWDO.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
2. The permittee shall submit deviation (excursion) reports that identify any record which shows an exceedance of the sulfur content restriction established in this permit.
3. The permittee shall also notify the Ohio EPA, NWDO of any changes in the fuel supplier or the

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PTI A

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fuel supply.

4. The permittee shall submit deviation (excursion) reports that identify each time when this emissions unit was not in compliance with the requirements of condition A.II.1.
5. In lieu of the excess emissions reports required under 40 CFR Part 60.334, the permittee shall submit excess emissions reports for emissions unit P012 in accordance with this permit.
6. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
7. This emissions unit is subject to the applicable provisions of Subpart GG of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and,
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Ohio Environmental Protection Agency
Northwest District Office
Division of Air Pollution Control

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ANR Pipeline Company
PTI Application: 02 12542
Issued

Facility ID: 0320010169

347 North Dunbridge Road
Bowling Green, Ohio 43402

Emissions Unit ID: P012

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V. Testing Requirements/Compliance Methods Determinations

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the NO_x outlet concentration and the mass emissions limitations for NO_x, SO₂ and CO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the above emissions limitations: for NO_x, Method 20 of 40 CFR Part 60, Appendix A; for SO₂, Method 6 of 40 CFR Part 60, Appendix A; and for CO Method 10 of 40 CFR Part 60, Appendix A. In lieu of the initial SO₂ emissions testing, the permittee may sample the Sulfur content of the fuel as provided for in 40 CFR Part 60, Subpart GG. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, NWDO.
 - d. The stack on this emissions unit shall be constructed such that the height and port locations meet the minimum requirements necessary to perform Methods 1-4 of 40 CFR Part 60, Appendix A.
 - e. The testing shall be performed at or near 30%, 50%, 75%, and 100% of peak load, as defined by 40 CFR Part 60, Subpart GG, unless otherwise specified or approved by the Ohio EPA.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emission tests.
 - g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, 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.

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shall be determined by multiplying the hourly emission rate by 8760 hours of operation and dividing by 2000 lbs/ton.

- d. Emission Limitation
 8.9 lbs VOC/hr & 39.0 tons VOC per rolling 12-month period

Applicable Compliance Method

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the vendor supplied emission factor of 0.073 pound of VOC/MM Btu heat input by the maximum Btu rating of 122.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with Method 25 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitations shall be demonstrated by the record keeping in condition A.III.1.

- e. Emission Limitation
 22.6 lbs CO/hr & 99.0 tons CO per rolling 12-month period

Applicable Compliance Method

Compliance with the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition A.V.1. Compliance with the annual emission limitations shall be determined by record keeping in condition A.III.1.

- f. Emission Limitation
 0.09 lb formaldehyde/hr & 0.4 ton formaldehyde/yr

Applicable Compliance Method

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor of 0.00071 pound of formaldehyde/MM Btu heat input (AP-42 Table 3.1-3 dated 4/00) by the maximum Btu rating of 122.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 8760 hours of operation and dividing by 2000 lbs/ton.

- g. Emission Limitation
 Visible particulate emissions shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible emissions limitations established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

VI. Miscellaneous Requirements

1. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce

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the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency
Environmental Appeals Board
401 M Street, SW (MC-113do)
Washington, D.C. 21460

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P012 - 122 MMBtu/hr NG fired Turbine, Unit No. 1	OAC rule 3745-31-05	None

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that any process change that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0

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ton per year may require the permittee to apply for and obtain a new Permit to Install.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P013 - 122 MMBtu/hr NG fired Turbine, Unit No. 2	OAC Rule 3745-31-05 (A) 40 CFR 52.21 OAC Rule 3745-31-10 through 3745-31-20 OAC Rule 3745-17-07(A) OAC Rule 3745-18-06(F) OAC Rule 3745-17-11(B)(4) 40 CFR Part 60, Subpart GG

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Applicable Emissions Limitations/Control Measures	
35 ppmvd nitrogen oxides (NO _x) at 15% Oxygen	See A.I.2.c. See A.I.2.c. See A.I.2.d.
17.1 lbs NO _x /hr & 74.9 tons NO _x /yr	
2.4 lbs sulfur dioxide (SO ₂) /hr & 10.5 tons SO ₂ /yr	
22.6 lbs carbon monoxide (CO)/hr & 99.0 tons CO/yr	
3.2 lbs particulate emissions (PE)/hr & 14.0 tons PE/yr	
8.9 lbs Volatile Organic Compounds (VOC)/hr & 39.0 tons VOC/yr,	
0.1 lb formaldehyde/hr & 0.4 ton formaldehyde/yr	
visible particulate emissions shall not exceed 10 percent opacity as a six-minute average	
See A.I.2.b.	
74.9 tons NO _x , 99.0 tons CO, 39.0 tons VOC, and 14.0 tons PE per rolling 12-month period	
See A.I.2.a.	
See A.I.2.c.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

2.a Per the requirements of 40 CFR 52.21, the permittee is required to perform a Best Available Control Technology (BACT) review for NO_x, CO, PE/PM₁₀, and VOC. The emissions limits based on the BACT requirements are listed under OAC rule 3745-31-05(A)(3) above. The following determinations have been made for each pollutant:

PE- Burning natural gas in an efficient combustion turbine. For this permit, it is assumed that all PE emissions are PM₁₀.

NO_x- Use of DLN burners with a controlled rate of 35 ppmvd at 15% Oxygen.

CO- Burning natural gas in an efficient combustion turbine.

VOC- Burning natural gas in an efficient combustion turbine.

2.b The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20 and 40 CFR Part 52.21.

2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.d The emissions limits based on this applicable rule are less stringent than the limits established pursuant to OAC Rule 3745-31-05. Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.

II. Operational Restrictions

1. As specified in the permittee's PTI application, the maximum heat input rating of this emissions unit is 122 MM Btu/hr. This value corresponds to a maximum natural gas fuel flow of 132,900 scf/hr, with a lower heat value of 918 Btu/scf. The permittee shall operate this emissions unit within the parameters specified above, except for start-up and shut-down. Start-up and shut-down periods shall be defined as any time the unit is operating at less than 30 percent load. Start-up and shut-down periods shall not exceed the vendor recommendations for proper operation of the turbine.
2. The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 2 grains per 100 standard cubic feet.
3. During the first 12 month of operation following startup, the permittee shall be limited to the

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following emission limits for NO_x and CO (including start-up and shut-down emissions):

Month(s)	Emission Limitations	
	NO _x	CO
1	6.4	8.4
1-2	12.7	16.8
1-3	19.1	25.2
1-4	25.4	33.6
1-5	31.8	42.0
1-6	38.1	50.4
1-7	44.5	58.8
1-8	50.8	67.2
1-9	57.2	75.6
1-10	63.5	84.0
1-11	69.9	92.4
1-12	74.9	99.0

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit P013:
 - a. the natural gas usage rate, in million cubic feet;
 - b. the hours of operation;
 - c. the monthly emission rate* for PE, NO_x, CO, and VOC;
 - d. during the first 12 calendar months of operation following startup, the cumulative emission rate for NO_x, and CO, in tons; and
 - e. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for PE, NO_x, CO, and VOC, in tons.

* The permittee shall use the most recent testing/emissions data available for each respective pollutant, in conjunction with the quantity of fuel and hours of operation recorded above to determine the monthly emissions. The emissions calculations shall include start-up and shutdown periods.

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall monitor and record the fuel flow for this emissions unit on a daily basis.

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4. The permittee shall maintain documentation on the sulfur contents and heat values of the fuels received as follows: ASTM D 2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels. The permittee shall determine the heat value of the fuels using ASTM method D240. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Ohio EPA, Central Office. The newest or most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used if they comply with the requirements specified in 40 CFR Part 60.13, or upon written approval by the Ohio EPA, Central Office. No sampling of the nitrogen content is necessary as long as the permittee exclusively burns natural gas in this emissions unit.
5. The frequency of the sulfur sampling by either the permittee or the supplier shall be such that it complies with following custom fuel sampling schedule:
 - a. twice monthly for six months;
If this sampling shows little variability and shows compliance with the sulfur content restriction, then -
 - b. Once per calendar quarter for six quarters;
If this sampling shows little variability and shows compliance with the sulfur content restriction, then -
 - c. semi-annually, during the first and third calendar quarters of the year.

Should any sulfur analysis indicate non-compliance with the sulfur content restriction, or if there is a change in the fuel supplier or the fuel supply, the sulfur monitoring shall be conducted weekly while the custom fuel sampling schedule is being re-examined by the Ohio EPA, NWDO.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
2. The permittee shall submit deviation (excursion) reports that identify any record which shows an exceedance of the sulfur content restriction established in this permit.
3. The permittee shall also notify the Ohio EPA, NWDO of any changes in the fuel supplier or the

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fuel supply.

4. The permittee shall submit deviation (excursion) reports that identify each time when this emissions unit was not in compliance with the requirements of condition A.II.1..
5. In lieu of the excess emissions reports required under 40 CFR Part 60.334, the permittee shall submit excess emissions reports for emissions unit P012 in accordance with this permit.
6. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
7. This emissions unit is subject to the applicable provisions of Subpart GG of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and,
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Ohio Environmental Protection Agency
Northwest District Office
Division of Air Pollution Control
347 North Dunbridge Road
Bowling Green, Ohio 43402

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V. Testing Requirements/Compliance Methods Determinations

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the NO_x outlet concentration and the mass emissions limitations for NO_x, SO₂ and CO.
 - c. The following test method(s) shall be employed to demonstrate compliance with the above emissions limitations: for NO_x, Method 20 of 40 CFR Part 60, Appendix A; for SO₂, Method 6 of 40 CFR Part 60, Appendix A; and for CO Method 10 of 40 CFR Part 60, Appendix A. In lieu of the initial SO₂ emissions testing, the permittee may sample the Sulfur content of the fuel as provided for in 40 CFR Part 60, Subpart GG. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, NWDO.
 - d. The stack on this emissions unit shall be constructed such that the height and port locations meet the minimum requirements necessary to perform Methods 1-4 of 40 CFR Part 60, Appendix A.
 - e. The testing shall be performed at or near 30%, 50%, 75%, and 100% of peak load, as defined by 40 CFR Part 60, Subpart GG, unless otherwise specified or approved by the Ohio EPA.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, NWDO refusal to accept the results of the emission tests.
 - g. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, 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.

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- h. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO. As part of the stack test report, it is necessary to provide the identification of peak load of the unit, as defined by 40 CFR Part 60, Subpart GG and the average load that the emissions unit was operated during the test.
- i. In lieu of the test methods and procedures required under 40 CFR Part 60.335, the permittee shall follow the testing requirements in accordance with this permit.
2. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
- a. Emission Limitation
 35 ppmvd NOx at 15% Oxygen,
 17.1 lbs NOx/hr & 74.9 tons NOx per rolling 12-month period
- Applicable Compliance Method
 Compliance with the allowable outlet concentration and the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition A.V.1. Compliance with the annual emission limitations shall be demonstrated by the record keeping in condition A.III.1.
- b. Emission Limitation
 3.2 lbs PE/hr & 14.0 tons PE per rolling 12-month period
- Applicable Compliance Method
 Compliance with the lbs/hr emission limitation shall be demonstrated by multiplying the vendor supplied emission factor of 0.0262 lb/MM Btu heat input by the maximum Btu rating of 122.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with Method 5 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitations shall be demonstrated by the record keeping in condition A.III.1.
- c. Emission Limitation
 2.4 lbs SO2/hr & 10.5 tons SO2/yr
- Applicable Compliance Method
 Compliance with the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition A.V.1. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 8760 hours of operation and dividing by 2000 lbs/ton.
- d. Emission Limitation
 8.9 lbs VOC/hr & 39.0 tons VOC per rolling 12-month period

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Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the vendor supplied emission factor of 0.073 pound of VOC/MM Btu heat input by the maximum Btu rating of 122.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with Method 25 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitations shall be demonstrated by the record keeping in condition A.III.1.

- e. Emission Limitation
22.6 lbs CO/hr & 99.0 tons CO per rolling 12-month period

Applicable Compliance Method

Compliance with the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition A.V.1. Compliance with the annual emission limitations shall be determined by record keeping in condition A.III.1.

- f. Emission Limitation
0.09 lb formaldehyde/hr & 0.4 ton formaldehyde/yr

Applicable Compliance Method

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor of 0.00071 pound of formaldehyde/MM Btu heat input (AP-42 Table 3.1-3 dated 4/00) by the maximum Btu rating of 122.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with approved US EPA test methods. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 8760 hours of operation and dividing by 2000 lbs/ton.

- g. Emission Limitation
Visible particulate emissions shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible emissions limitations established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

VI. Miscellaneous Requirements

1. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce

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the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency
Environmental Appeals Board
401 M Street, SW (MC-113do)
Washington, D.C. 21460

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PTI A

Emissions Unit ID: P013

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - 122 MMBtu/hr NG fired Turbine, Unit No. 2	OAC rule 3745-31-05	None

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install

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prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that any process change that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new Permit to Install.

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PTI A

Emissions Unit ID: P014

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - 500 Hp Emergency Generator	40 CFR 52.21	See A.I.2.a.
	OAC rule 3745-31-10 through 3745-31-20	
	OAC Rule 3745-31-05 (A)	See A.I.2.b.
		16.3 lbs Nitrogen Oxides (NO _x)/hr
		14.9 lbs Carbon Monoxide (CO)/hr
		0.2 lb particulate emissions (PE)/hr & 0.2 ton PE/yr
		0.5 lb Volatile Organic Compounds (VOC)/hr & 0.5 ton VOC/yr
	OAC Rule 3745-31-05 (D)	16.3 tons NO _x , 14.9 tons CO per rolling 12-month period, See A.I.2.c.
	OAC Rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average except as provided by rule.
	OAC Rule 3745-17-11(B)(4)	See A.I.2.d.
	OAC rule 3745-18-06	See A.I.2.e.

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Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Per the requirements of 40 CFR 52.21, the permittee is required to perform a Best Available Control Technology (BACT) review for NO_x, CO, PE/PM₁₀, and VOC. BACT has been determined to be the use of natural gas and efficient combustion technology for these pollutants.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through 20, 40 CFR Part 52.21, and OAC rule 3745-31-05(D).
- 2.c** The permittee has requested a federally enforceable limitation of 16.3 tons NO_x, and 14.9 tons CO per rolling 12-month period based on 2000 hours of operation, see A.II.1.
- 2.d** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.e** This emissions unit is exempt from the SO₂ emission limitations established by OAC rule 3745-18-06 per OAC rule 3745-18-06(B).

II. Operational Restrictions

1. The maximum annual hours of operation for emissions unit shall not exceed 2000 hrs per rolling 12-month period. To ensure enforceability during the first 12 calendar months following startup, the permittee shall not exceed the hourly operational restrictions specified in the following table:

Month	Cumulative hours of Operation
1	400
1-2	800
1-3	1200
1-4	1600
1-12	2000

After the first 12 calendar months following the startup, compliance with the annual hourly restriction shall be based on a rolling, 12-month summation. Startup shall be defined as when the emissions unit commences operation for any purpose.

2. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

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- a. the number of hours of operation;
- b. the monthly emission* rate for NOx and CO, in tons; and
- c. during the first 12 calendar months of operation following startup, the cumulative hours of operation;
- d. beginning the first month after the 12 calendar months of operation following startup, the rolling, 12- month summation of the hours of operation;
- e. during the first 12 calendar months of operation following startup, the cumulative emission rates for NOx and CO; and
- f. beginning the first month after the 12 calendar months of operation following startup, the rolling, 12- month summation of the emission rates for NOx, and CO.

* The permittee shall use the most recent testing/emissions data available for each pollutant, in conjunction hours of operation recorded above to determine monthly emissions.

2. For each day during which the permittee burns a fuel other than natural gas the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
2. The permittee shall submit deviation reports that identify any exceedances of the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable hours of operation; and
 - b. the rolling 12-month hours of operation restriction.
3. The above reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(1).

V. Testing Requirements

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1. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
 - a. Emission Limitations
16.3 lbs NO_x/hr

Applicable Compliance Method
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor of 4.08 pounds of/MM Btu heat input (AP-42 Table 3.2-2 dated 8/00) by the maximum Btu rating of 4.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with Method 7 of 40 CFR Part 60, Appendix A.
 - b. Emission Limitations
14.8 lbs CO/hr

Applicable Compliance Method
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor of 3.7 lb of CO/MM Btu heat input (AP-42 Table 3.2-3 dated 8/00) by the maximum Btu rating of 4.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with Method 10 of 40 CFR Part 60, Appendix A.
 - c. Emission Limitations
0.2 lb PE/hr & 0.2 ton PE/yr

Applicable Compliance Method
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor of 0.048lb of/MM Btu heat input (AP-42 Table 3.2-2 dated 8/00) by the maximum Btu rating of 4.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with Method 5 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 2000 hours of operation and dividing by 2000 lbs/ton.
 - d. Emission Limitations
0.5 lb VOC/hr & 0.5 ton VOC/yr

Applicable Compliance Method
Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor of 0.12 lb of/MM Btu heat input (AP-42 Table 3.2-2 dated 8/00) by the maximum Btu rating of 4.0 MM Btu/hr. If required, the permittee shall demonstrate compliance by emission testing in accordance with Method 25 of 40 CFR Part 60, Appendix A. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 2000 hours of operation and dividing by 2000 lbs/ton.

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- e. Emission Limitations
 - 16.3 tons NOx per rolling 12-month period
 - 14.9 tons CO per rolling 12-month period

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Compliance with the annual emission limitations shall be demonstrated by the record keeping in condition A.III.1.

f. Emission Limitation

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

Applicable Compliance Method

If required, compliance with the visible emissions limitations established by this permit shall be determined by the method specified in OAC 3745-17-03 (B)(1).

VI. Miscellaneous Requirements

1. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U. S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the Ohio EPA.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply:

- a. The effective date of the permit shall be 30 days after the service of notice to any public commentors. The final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency
Environmental Appeals Board
401 M Street, SW (MC-113do)
Washington, D.C. 21460

ANR 1
PTI A

Emissions Unit ID: P014

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - 500 Hp Emergency Generator	OAC rule 3745-31-05	none

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC chapter 3745-31 requires permittees to apply for and obtain a new or modified Permit to Install

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prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that any process change that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new Permit to Install.