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

Certified Mail

10/30/2012

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Hillary Moseley
Utica Gas Services, L.L.C.- Augusta Compressor Facility
P.O. Box 18312
Oklahoma City, OK 73154

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0210012004
Permit Number: P0110714
Permit Type: Initial Installation
County: Carroll

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Free Press Standard. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; West Virginia

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

Permit Strategy Write-Up

1. Check all that apply:

   xSynthetic Minor Determination

   Netting Determination

2. Source Description:

   This is a new installation of additional equipment at a natural gas gathering station (or central delivery point) in Carroll County. The facility already has one dessicant dehydration unit and one 400 bbl condensate tank that don't require permitting. The following equipment were recently permitted in P0110302: a 35 mmscfdtriethylene glycol dehydration unit (P001), condensate storage (T001) and truck loading (J001), and an enclosed flare (P002). The new equipment will include 2 -1,340 HP compressor engines (P003 and P004), maintenance blowdowns (P005), methanol storage (T003 and T004) and loading (J002) and fugitive equipment leaks (P801). Here is a description of the process from the application:

   The natural gas inlet stream from surrounding area wells enters and inlet separator and then is compressed by 2-1,340 HP engine driven compressors. The compressor discharge enters the triethylene glycol dehydration unit before exiting the facility. The dehydration unit has the option of using one of two (2) glycol pumps, an electric primary pump or 2 secondary gas-injection pumps. In the dehydration process, gas passes through a contactor vessel where water is absorbed by the glycol. The "rich" glycol containing water goes to the glycol dehydrator reboiler where heat is used to boil off the water. The heat is supplied by a natural gas-fired reboiler that exhausts to the atmosphere. Still vent vapors from the 35-MMSCFD dehydration unit will be controlled by an air-cooled condenser. Non-condensables from the still column overheads will be routed to the enclosed flare. Flash tank off-gas from the dehydration unit will be burned as fuel. The excess flash gas will be sent to the condensate storage tank for recovery in the VRU or routed to the enclosed flare. Condensate from the inlet separator is stored in one (1) 400-bbl storage tank. Condensate truck loading also takes place at the facility, as well as emissions from fugitive sources.

   Methanol is stored in 2 – 8 bbl storage tanks. Methanol working and breathing emissions will be vented to the atmosphere.

   The VRU will capture all the working, breathing, and flashing emissions from the condensate tank and excess dehydrator flash tank off-gases and convey them to the transmission line. The recovered flash gas is rerouted to the inlet separator. Under normal operations, the VRU is a closed system and no emissions are released to the atmosphere. The emissions from the condensate tank and the dehydrator flash tank gases can also be routed to the enclosed flare.

3. Facility Emissions and Attainment Status: Carroll County is currently in attainment for all criteria pollutants. Potential uncontrolled facility emissions of VOC are greater than 100 TPY, so the facility is requesting federally enforceable restrictions to synthetic minor out of Title V. Potential uncontrolled HAP emissions from the dehydration unit would also be greater than 25 TPY, so the federally enforceable restrictions were used to synthetic minor out of MACT in P0110302. Per OAC rule 3745-77-01(X)(2), the fugitive emissions from the component leaks shall not be included in the determination of major source status.

4. Source Emissions: Actual emissions with the use of an oxidation catalyst as a control device will reduce emissions to less than or equal to the allowable emissions.

5. Conclusion: The permit requirements will ensure that the emissions remain below Title V and MACT thresholds.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
NOx	51.72
CO	15.24
VOC	18.20
SO2	0.63
PE	1.02

PUBLIC NOTICE
10/30/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Utica Gas Services, L.L.C.- Augusta Compressor Facility
8034 Bane Rd NE,
East Twp., OH 44427
Carroll County
FACILITY DESC.: Crude Petroleum and Natural Gas Extraction
PERMIT #: P0110714
PERMIT TYPE: Initial Installation
PERMIT DESC: Initial installation of 2 compressor engines, maintenance blowdowns, methanol loading and fugitive equipment leaks at a natural gas compressor facility that already has a dehydration unit, condensate loading and storage, and a flare.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Jana Gannon, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171

Ohio Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Utica Gas Services, L.L.C.- Augusta Compressor Facility

Facility ID:	0210012004
Permit Number:	P0110714
Permit Type:	Initial Installation
Issued:	10/30/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Utica Gas Services, L.L.C.- Augusta Compressor Facility

Table of Contents

Authorization

Facility ID: 0210012004
Application Number(s): A0045166
Permit Number: P0110714
Permit Description: Initial installation of 2 compressor engines, maintenance blowdowns, methanol loading and fugitive equipment leaks at a natural gas compressor facility that already has a dehydration unit, condensate loading and storage, and a flare.
Permit Type: Initial Installation
Permit Fee: $1,400.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/30/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Utica Gas Services, L.L.C.- Augusta Compressor Facility
8034 Bane Rd NE
East Twp., OH 44427

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0110714
Permit Description: Initial installation of 2 compressor engines, maintenance blowdowns, methanol loading and fugitive equipment leaks at a natural gas compressor facility that already has a dehydration unit, condensate loading and storage, and a flare.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**J002**
Company Equipment ID:	ML-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	BD
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P801**
Company Equipment ID:	FUG
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Natural gas engines

Emissions Unit ID:	**P003**
Company Equipment ID:	MC1326
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	MC1643
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1]Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Area Source RICE MACT). Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution: P003 – P004. The complete New Source Performance Standards (NSPS) requirements, including the NSPS 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 Ohio EPA Northeast District Office.

C. Emissions Unit Terms and Conditions

1. J002, ML-1

Operations, Property and/or Equipment Description:

Methanol loading

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/01	Volatile organic compounds (VOC) emissions shall not exceed 0.78 lb/hr and 3.42 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State

Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than ten tons per year.

c. Monthly record keeping is not required since the emission limits are based on the emissions unit's potential to emit (at a throughput of 660 gal/hr).

d. All methanol loading lines shall be equipped with fittings which are vapor tight.

e. The permittee shall not permit methanol to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

(2) 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.

f) Testing Requirements

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

a. Emission Limitations:

VOC emissions shall not exceed 0.78 lb/hr and 3.42 tons per year.

Applicable Compliance Method:

Hourly VOC emissions shall be based on multiplying a loading loss factor (L*) by the hourly maximum loading rate of 660 gal/hr.

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation".

*L = 12.46 SPM/T

where:

L = loading loss, pounds per 1000 gallons loaded;

S = saturation factor, 1.45 for splash fill;

P = vapor pressure of liquid loaded (@ 48.3 ^{o}F = 1.0391);

M = molecular weight of vapor = 32.04; and

T = temperature of bulk liquid = 508.3 ^{o}R.

The TPY emission limitation was developed by multiplying the short-term emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.

2. P005, Blowdowns

Operations, Property and/or Equipment Description:

Uncontrolled compressor maintenance blowdown releases from periodic maintenance blowdown activities from equipment in natural gas service

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/01	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(D). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-31-05(D)	Volatile organic compounds (VOC) emissions shall not exceed 4.82 tons as a rolling, 12-month summation.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code

(ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than ten tons per year.

c) Operational Restrictions

(1) The permittee shall minimize the frequency and size of blowdown events by conducting routine operation and maintenance activities in a manner consistent with safety and good air pollution control practices.

(2) The annual volume of natural gas released from this emissions unit shall not exceed 780,000 scf per year, based upon a rolling, 12-month summation of the natural gas release rates.

d) Monitoring and/or Recordkeeping Requirements

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

a. number of compressor blowdown events;

b. mole % of each VOC component in the gas stream using a representative analysis;

c. the volume of gas emitted from all compressor blowdown events for each month, in scf; and

d. the rolling, 12-month summation of the volume of gas emitted from all compressor blowdown events, in scf.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. 4.82 tons VOCs as a rolling, 12-month summation; and

ii. 780,000 scf natural gas released per year as a rolling, 12-month summation.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

(3) 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.

f) Testing Requirements

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

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

VOC emissions shall not exceed 4.82 tons as a rolling, 12-month summation.

<u>Applicable Compliance Method</u>:

Compliance with the VOC emission limitation shall be demonstrated based upon the following calculation using the inputs provided in the permittee's application and the record keeping requirements in d)(1):

VOC (tons/month) = sum of the following for each VOC component:
= [molecular weight x ((volume of gas emitted/month) x (mole % of each VOC component/month)) / molar volume conversion] x (1 ton/2,000 pounds)

where:

molecular weight = constant, in lb/lb-mole;

volume of gas emitted/month = from records specified in d)(1)c, in scf;

mole % of each VOC component/month = from analysis required in d)(1)b, in %; and

molar volume conversion = 379.4 scf/lb-mole, at 60 deg F and 1 atm.

g) Miscellaneous Requirements

(1) None.

3. P801, FUG

Operations, Property and/or Equipment Description:

Fugitive VOC emissions from various equipment components, including valves, pumps, flanges, connectors, open-ended lines, compressors, drains/vents, pressure safety valves and sample points

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/01	Fugitive emissions of volatile organic compounds (VOC) shall not exceed 3.22 tons per year, which shall be repaired as soon as possible following detection. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS

pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/yr.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Leak Detection and Repair Program

a. The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment and compressors covered by this permit. This leak detection and repair program shall include the following elements:

i. An initial and then annual inspection of the ancillary and associated equipment and compressors shall be conducted to determine if a leak exists. Leaks shall be determined through the use of an analyzer meeting U.S. EPA Method 21, 40 CFR Part 60, Appendix A.

ii. The analyzer shall be operated and maintained following the instrument manufacturer's operation and maintenance instructions.

iii. A leak shall be determined if the instrument reading is equal to or greater than 10,000 ppm total VOC or the "leak detected" instrument reading required per any applicable rule.

iv. Documentation that includes the following:

(a) the date the inspection was conducted;

(b) the name of the employee conducting the leak check;

(c) the identification of any component that was determined to be leaking; and

(d) the date the component was repaired and determined to no longer be leaking.

b. The records associated with the leak detection and repair program shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

(2) 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.

f) Testing Requirements

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

a. Emission Limitation:

Fugitive emissions of VOC shall not exceed 3.22 tons per year.

Applicable Compliance Method:

The annual VOC limitation is the estimated potential-to-emit based upon the maximum number of components and type of service (gas/vapor and light liquid) expected at the natural gas production site. The appropriate emission factors from U.S. EPA's "Protocol for Equipment Leak Emission Estimates", Table 2-4, for Oil and Gas production Operations (a conservative estimate), shall be used to demonstrate compliance with the limit. The facility's potential emissions from ancillary and associated equipment shall be documented from the summation of the following calculations:

Component Type # of components x emission factor x % VOC* = lb VOC/hr

In Gas/Vapor Service

Number of connectors (150) x 0.000441 lb/hr x % VOC = lb VOC/hr

Number of valves (100) x 0.00992 lb/hr x %VOC = lb VOC/hr

Number of flanges (0) x 0.00086 lb/hr x % VOC = lb VOC/hr

Number of compressor seals (2) x 0.01940 lb/hr x % VOC = lb VOC/hr

Number of relief valves (10) x 0.01940 lb/hr x % VOC = lb VOC/hr

Number of other components (5) x 0.0194 lb/hr x % VOC = lb VOC/hr

*Where: % VOC = 22.1158 per company's analysis

In Light Liquid Service

Number of connectors (0) x 0.000463 lb/hr x % VOC = lb VOC/hr

Number of valves (50) x 0.00551 lb/hr x % VOC = lb VOC/hr

Number of flanges (50) x 0.00024 lb/hr x % VOC = lb VOC/hr

Number of pump seals (2) x 0.0287 lb/hr x % VOC = lb VOC/hr

Number of relief valves (0) x 0.01653 lb/hr x % VOC = lb VOC/hr

Number of other components (5) x 0.01653 lb/hr x % VOC = lb VOC/hr

*Where: % VOC = 100 per company's analysis

The total summation of VOC emissions per hour shall be multiplied by 8760 hours per year and divided by 2000 pounds to calculate the estimated ton per year fugitive VOC emissions for the demonstration of compliance.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Natural gas engines: P003,P004,

EU ID	Operations, Property and/or Equipment Description
P003	1,340 HP Caterpillar G3516 TALE compressor engine with oxidation catalyst, manufactured 2/24/05.
P004	1,340 HP Caterpillar G3516 TALE compressor engine with oxidation catalyst, manufactured 1/25/06.

Both engines are 4-stroke, lean-burn stationary RICE located at an area source of HAPs.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)g, d)(2), d)(3), d)(4), d)(5) and e)(4)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 0.77 lb/hr and 3.37 tpy (not including formaldehyde). Carbon monoxide (CO) emissions shall not exceed 1.74 lbs/hr and 7.62 tpy. Sulfur dioxide (SO_2) emissions shall not exceed 0.01 lb/hr and 0.04 tpy. Particulate emissions (PE) shall not exceed 0.12 lb/hr and 0.53 tpy.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/1/2006	See b)(2)b.
c.	ORC 3704.03(T)	Nitrogen oxides (NO_x) emissions shall not exceed 25.86 tons per rolling, 12-month period.
d.	OAC rule 3745-17-07(A)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
f.	OAC rule 3745-18-06	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(A).
g.	ORC 3704.03(F)(4)(d)	See d)(2), d)(3), d)(4), d)(5) and e)(4).
h.	40 CFR Part 60 Subpart OOOO In accordance with 40 CFR 63.5365(c), this emissions unit is a reciprocating compressor subject to the Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution. 40 CFR 60.5385	The reciprocating compressor, constructed, modified, or reconstructed after 8/23/11 and located between the wellhead and the point of custody transfer to the natural transmission and storage segment, shall meet the requirements of 40 CFR Part 60, Subpart OOOO no later than 10/15/12 or upon initial startup following that date; and by tracking either the hours of operation or number of months between compressor rod packing replacement. See c)(2), d)(6), e)(5) and e)(6).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that

BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the VOC, CO, SO_2 and PE from this air contaminant source, since the potentials to emit for VOC, CO, SO_2 and PE are less than ten tons per year.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

(2) Beginning on 10/15/12 or upon initial startup if the reciprocating compressor is installed after this date, the permittee shall replace the reciprocating compressor rod packing every 26,000 hours of operation; or if not tracking the hours of operation, within 36 months following 10/15/12 or the date of startup (whichever is later), and every 36 months from the date of the last rod packing replacement.

d) Monitoring and/or Recordkeeping Requirements

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

(2) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), P003 – P004, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been

documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: formaldehyde

TLV (mg/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr): 0.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.97

MAGLC (ug/m3): 8.77

The permittee, has demonstrated that emissions of formaldehyde, from emissions unit(s) P003 – P004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials*, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials*, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

*The composition of the gas being processed may vary due to the nature of the industry. The company will sample the gas semiannually to perform a detailed gas analysis in order to determine if the composition has changed such that it will result in an increase in emissions of any toxic air contaminant.

(4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(6) Beginning on 10/15/12 or upon initial startup if the reciprocating compressor is installed after this date, the permittee shall either continuously monitor and record the number of hours of operation or track the number of months since the last rod packing replacement. Records shall be maintained of the date and time of the replacement of the compressor rod packing for each reciprocating compressor in operation at the facility. Records of deviations from the 26,000 hours or 36 months of operation between rod packing replacements shall also be maintained. These records shall be retained for at least 5 years.

e) 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. Each report shall be submitted within 30 days after the deviation occurs.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

(3) 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.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model that was used to demonstrate compliance with the Toxic Air Contaminant Statue, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration in the annual PER. If no changes to the emissions, emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.

(5) The permittee shall submit an initial annual report within 30 days after the end of the initial compliance period, or no later than 11/14/13 or within one year and 30 days of startup, whichever is later. Subsequent annual reports are due on the same date each year following the initial report. The annual reports shall include the following information:

a. company name and address of the affected facility;

b. identification of each affected facility included in the annual report*;

c. beginning and ending dates of the reporting period;

d. the identification of each reciprocating compressor;

e. the cumulative number of hours of operation or the number of months of operation since initial startup of the reciprocating compressor, since the effective date of the NSPS, or since the previous reciprocating compressor rod packing replacement, whichever is later;

f. records of any deviations from the 26,000 hours or 36 months of operation between rod packing replacements; and

g. certification by the responsible official of truth, accuracy, and completeness.

* One report for multiple affected facilities may be submitted provided the report contains all of the information required and clearly identified for each.

(6) Pursuant to the NSPS, 40 CFR 60.5420 and 60.7(a), the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction (or reconstruction as defined in 40 CFR 60.15) commencement date (postmarked no later than 30 days after such date); and

b. notification of any physical or operational change to the existing facility which may increase the emission rate of any air pollutant to which the standard applies (unless that change is specifically exempted under the NSPS or in 40 CFR 60.14(e)) shall be postmarked 60 days before the change is commenced (or as soon as practicable) and shall include information describing the precise nature of the change, present and produced emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change.

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
50 West Town Street, Suite 700
P. O. Box 1049
Columbus, Ohio 43216-1049

and

Northeast District Office of the Ohio EPA
Division of Air Pollution Control
2110 E. Aurora Rd, Twinsburg, Ohio 44087

f) Testing Requirements

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

a. Emission Limitation:

PE shall not exceed 0.12 lb/hr and 0.53 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.00991 lb/mmBtu (the emission factor from AP-42,"Stationary Internal Combustion Sources", Table 3.2-3, 7/00) by 11.62 mmBtu/hr (the maximum input rating of this unit).

The TPY emission limitation was developed by multiplying the hourly emission limitation (0.12 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

b. Emission Limitation:

NO_x emissions shall not exceed 25.86 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the emission limitation above shall be determined by dividing 2.0 g/BHP-hr (the manufacturer supplied emission factor) by 454 g/lb, and then multiplying by 1,340 brake-horsepower (the maximum power output rating of this unit). The rolling value is obtained by multiplying by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton.

If required, compliance with the NO_x emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

c. Emission Limitation:

CO emissions shall not exceed 1.74 lbs/hr and 7.62 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by dividing 0.59 g/BHP-hr (the manufacturer supplied emission factor, including the 80% control efficiency of the catalytic converter) by 454 g/lb, and then multiplying by 1,340 brake-horsepower (the maximum power output rating of this unit).

The TPY emission limitation was developed by multiplying the hourly emission limitation (1.74 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

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

d. Emission Limitation:

VOC emissions shall not exceed 0.77 lb/hr and 3.37 tpy (not including formaldehyde).

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by dividing 0.26 g/BHP-hr (the manufacturer supplied emission factor, including the 55% control efficiency of the catalytic converter) by 454 g/lb, and then multiplying by 1,340 brake-horsepower (the maximum power output rating of this unit).

The TPY emission limitation was developed by multiplying the hourly emission limitation (0.77 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

If required, compliance with the hourly VOC emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A.

e. Emission Limitation:

SO_2 emissions shall not exceed 0.01 lb/hr and 0.04 tpy.

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.000588 lb/mmBtu (the emission factor from AP-42,"Stationary Internal Combustion Sources", Table 3.2-3, 7/00) by 11.62 mmBtu/hr (the maximum input rating of this unit).

The TPY emission limitation was developed by multiplying the hourly emission limitation (0.01 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

If required, compliance with the hourly SO_2 emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

f. Emission Limitation:

Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation shall be demonstrated based upon the visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g. Emission Limitation:

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

Applicable Compliance Method:

Compliance with this emission limitation may be based upon an emission factor of 0.00991 pound/million Btu of heat input. This emission factor is specified in the U.S. EPA reference document AP-42, Compilation of Air Pollutant Emission Factors, Section 3.2, Table 3.2-3 (7/00).

If required, compliance with this emission limitation shall be demonstrated 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).

g) Miscellaneous Requirements

(1) Any amendment to 40 CFR Part 60, Subpart OOOO shall supersede the compliance limitations and/or options contained in this permit.