



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/12/2012

Certified Mail

Scott Kingston
East Ohio Gas - Columbiana Compressor Station
1875 Grange Rd
Charleroi, PA 15022

Facility ID: 0215000182
Permit Number: P0112196
County: Columbiana

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Administrative Permit Modification

Dear Permit Holder:

Enclosed is a final Ohio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

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

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office as indicated on page one of your permit.

Sincerely,



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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northeast District Office



FINAL

Division of Air Pollution Control
Title V Permit
for
East Ohio Gas - Columbiana Compressor Station

Facility ID:	0215000182
Permit Number:	P0112196
Permit Type:	Administrative Permit Modification
Issued:	12/12/2012
Effective:	12/12/2012
Expiration:	10/10/2016



Division of Air Pollution Control
Title V Permit
for
East Ohio Gas - Columbiana Compressor Station

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Scheduled Maintenance.....	6
4. Risk Management Plans	6
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	10
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
B. Facility-Wide Terms and Conditions.....	16
C. Emissions Unit Terms and Conditions	18
1. B002, Engine #1, Unit 4901	19
2. B003, Engine #2, Unit 4902	24



Authorization

Facility ID: 0215000182
Facility Description: Compressor Station, 27842 Hartley Rd.
Application Number(s): M0002010
Permit Number: P0112196
Permit Description: Administrative Permit Amendment to add an insignificant emissions unit (T024) Tank 1-3, 1260-gallon produced fluids tank, splash fill.
Permit Type: Administrative Permit Modification
Issue Date: 12/12/2012
Effective Date: 12/12/2012
Expiration Date: 10/10/2016
Superseded Permit Number: P0107283

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

East Ohio Gas - Columbiana Compressor Station
Hartley Road.
Half a mile east of Stanley road
Knox Twp., OH 44619

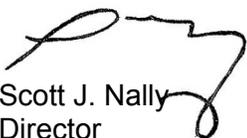
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

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

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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



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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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



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

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

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

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

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

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northeast District Office.

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

3. Scheduled Maintenance

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

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the



Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
- (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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



10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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



13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.



- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

15. Operational Flexibility

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

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



16. Emergencies

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

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

17. Off-Permit Changes

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

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

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

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

23. Title VI Provisions

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



- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

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



a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



B. Facility-Wide Terms and Conditions



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

a) B.4.

2. There are fugitive VOC emissions from this facility that have been identified in the Title V permit application and which, in aggregate, would constitute a non-insignificant emissions unit. These emissions are not currently subject to any applicable emissions limitations and/or control requirements, but shall be included in the annual Fee Emissions Report for reporting and emission fee purposes.

[Authority for term: OAC rule 3745-78-02]

3. The following emissions unit(s) contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ: B002 and B003. The complete MACT requirements, including the MACT General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

4. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirement (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

- T001: Tank holding 2,000 gallons of lube oil, with splash fill (A-1);
- T002: Tank holding 2,000 gallons of lube oil, with splash fill (A-2);
- T003: Tank holding 2,000 gallons of lube oil, with splash fill (A-3);
- T012: 550 gallon coolant (50% water & 50% glycol) tank (G-1);
- T013: 6,000 gallon tank holding produced fluids, Splash fill (I1);
- T014: 200 gallon pressurized tank holding new lube oil located under tanks T001-T003 (A-4);
- T015: 200 gallon pressurized tank holding new lube oil located under tanks T001-T003 (A-5);
- T016: 750 gallon tank, under B002, holding new lube oil, Splash fill (A-6);
- T018: 618 quart (approx. 155 gallons) tank holding new lube oil (next to B003) (G-1);
- T019: 300 gallon tank, under B003, holding new lube oil (A-7);
- T020: Tank G-2 - 300 gallon coolant tank (50% water and 50% glycol) Located under B003;
- T021: Tank I-2 - 1260 gallon produced fluids tank, splash fill;
- T022: 300 gallon tank (E-1), under B002, holding used oil (Engine #1);
- T023: 300 gallon tank (E-2), under B003, holding used oil (Engine #2); and
- T024: Tank 1-3 - 1260 gallon produced fluids tank, splash fill.



C. Emissions Unit Terms and Conditions



1. B002, Engine #1, Unit 4901

Operations, Property and/or Equipment Description:

Engine no. 1, Unit 4901: Cooper-Bessemer engine, Model GMXD-10, 660 HP (5.2 mmBtu/hr) 2-stroke, lean burn reciprocating internal combustion engine (RICE)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions (PE) shall not exceed 0.062 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-06(G)	This emission unit is exempt from this requirement pursuant to OAC rule 3745-18-06(A). See b)(2)a.
d.	40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6580 to 63.6675) In accordance with 40 CFR 63.6585, this emissions unit is a stationary internal combustion engine (ICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines)	The existing, natural gas, stationary 2SLB, spark ignition (SI) reciprocating internal combustion engine (RICE), located at an area source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than October 19, 2013.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.6603(a) Table 2d #6 to Subpart ZZZZ	By 10/19/13, the permittee shall comply with the maintenance/operational requirements from the NESHAP for non-emergency, non-black start, existing 2SLB area source SI RICE.

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.

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

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

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



c) Operational Restrictions

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

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

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

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

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

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

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.

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



- (2) All records maintained for this emissions unit may be retained at an off-site location as the records are readily available for inspection as specified in the Standard Terms and Conditions of this permit.

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

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

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

e) Reporting Requirements

- (1) The permittee shall submit deviation 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.

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.0384 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-1 (7/00) for PM₁₀ (filterable).

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

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

g) Miscellaneous Requirements

(1) None.



2. B003, Engine #2, Unit 4902

Operations, Property and/or Equipment Description:

Engine no. 2, Unit 4902: Waukesha engine, Model L7042G, 750 HP (7.4 mmBtu/hr) 4-stroke, rich burn reciprocating internal combustion engine (RICE)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-06(G)	This emission unit is exempt from this requirement pursuant to OAC rule 3745-18-06(A). See b)(2)a.
d.	40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6580 to 63.6675) In accordance with 40 CFR 63.6585, this emissions unit is a stationary internal combustion engine (ICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.	The existing, natural gas, stationary 4SRB spark ignition (SI) reciprocating internal combustion engine (RICE), located at an area source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than October 19, 2013.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR 63.6603(a) Table 2d #10 to Subpart ZZZZ	Following the compliance date of 10/19/13, emissions of formaldehyde shall not exceed 2.7 ppmvd at 15% O ₂ or emissions of formaldehyde shall be reduced by 76% or more.

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.

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

- b. Following the compliance date of the NESHAP, the permittee shall control the emissions of formaldehyde from the stationary RICE exhaust using a non-selective catalytic reduction (NSCR) control device. The permittee shall either limit the concentration of formaldehyde to 2.7 ppmvd or less at 15% O₂ at the outlet of the control device or the average reduction of formaldehyde, calculated according to 40 CFR 63.6620(e), shall not be less than 76% of the uncontrolled formaldehyde emissions.

[Authority for term: 40 CFR 63.6603, 40 CFR 63.6640(a) and Subpart ZZZZ Table 2d #10]

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

Applicable Rule	Requirement
40 CFR 63.6595(a)(1)	The compliance date for 40 CFR Part 63, Subpart ZZZZ for existing SI RICE is 10/19/13.
Applicable Tables from 40 CFR Part 63, Subpart ZZZZ	Following the compliance date, comply with: emission limit options in Table 2d #10; operating limitations in Table 1b #1; performance test frequency in Table 3 #4; performance test methods in Table 4 #2 or #3; initial compliance demonstration in Table 5 #4 or #6; continuous compliance monitoring requirements in Table 6 #10; reporting requirements/frequency in Table 7; and the general provisions from 40 CFR Part 63, Subpart A in Table 8.
40 CFR 63.6603(a)	Following the compliance date, maintain compliance with the emission limitation in Table 2d #10 (limit formaldehyde to 2.7 ppmvd at 15% O ₂ or reduce formaldehyde by 76%) and the operating limitations identified in Table 1b to 40 CFR Part 63, Subpart ZZZZ.
40 CFR 63.6603; 40 CFR 63.6612; 40 CFR 63.6620;	Conduct an initial performance test within 180 days following the compliance date, or by 4/19/14, using the appropriate test methods in Table 4; while continuously



and Subpart ZZZZ Tables 4 & 5	monitoring the temperature at the inlet of the catalyst to the NSCR using a continuous parameter monitoring system (CPMS), as required in Table 5; and establish the operating parameter for the pressure drop across the catalyst.
40 CFR 63.6615; Subpart ZZZZ Table 3 #4; and Table 6 #10	By the compliance date, install CPMS at the inlet of the catalyst to continuously monitor the temperature. Following the initial performance test must conduct subsequent performance tests every 8,760 hours of operation or every 3 years, whichever comes first, to demonstrate compliance with the formaldehyde emission standard, using the test methods in Table 4; and measure the pressure drop across the catalyst monthly.
40 CFR 63.6625(b); and 40 CFR 63.8(c), (d), & (e)	Develop and implement a site-specific monitoring plan for the continuous monitoring system (CMS), to include a quality control program and performance evaluation test plan for the CMS, in accordance with 40 CFR 63.8.
40 CFR 63.6665	Meet all of the general provisions of Subpart A, from Sections 63.1 through 63.15, that apply to the SI RICE, as identified in Table 8 to 40 CFR Part 63, Subpart ZZZZ.

c) Operational Restrictions

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

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

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

Applicable Rule	Requirement
40 CFR 63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
40 CFR 63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.
40 CFR 63.6603; 40 CFR 63.6640(a); and Subpart ZZZZ Table 1b #1	Comply with operating limitations in Table 1b: The temperature of the stationary RICE exhaust at the inlet of the oxidation catalyst shall be maintained at greater than or equal to 750 degrees Fahrenheit and less than or equal to 1,250 degrees Fahrenheit; and the pressure drop across the catalyst shall be maintained at no more than 2 inches of water, plus or minus 10% of the pressure drop measured during the initial performance test, at 100% load.



40 CFR 63.6625(b)(4) through (6)	Must conduct an annual equipment performance evaluation or system accuracy audit on the temperature measurement device. The temperature sensor must meet the minimum tolerance range and must be installed, operated, and maintained as specified in 40 CFR 63.6625(b) and in accordance with the site-specific monitoring plan.
----------------------------------	--

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.

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

- (2) All records maintained for this emissions unit may be retained at an off-site location as the records are readily available for inspection as specified in the Standard Terms and Conditions of this permit.

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

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

Applicable Rule	Requirement
40 CFR 63.6625(b); 40 CFR 63.8; and Subpart ZZZZ Table 6 #10	Following the compliance date, CPMS shall be installed to continuously monitor the catalyst inlet temperature to the NSCR. The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period and the temperature readings shall be reduced to 4-hour rolling averages. The pressure drop across the catalyst must be monitored and recorded monthly. Develop site-specific monitoring plan for the CPMS.
40 CFR 63.6635	Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels.
40 CFR 63.6640(a)	Demonstrate continuous compliance with the emission limitation and operating limitations identified in Tables 2d and 1b according to the methods specified in Table 6 to 40 CFR Part 63, Subpart ZZZZ.
40 CFR 63.6655(a)	Keep records of: 1. each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ; 2. the occurrence and duration of each malfunction of the RICE and any control or monitoring equipment; 3. corrective actions taken during each period of malfunction to minimize emissions and restore normal operations; 4. records of performance tests and



	performance evaluations of the CPMS; and 5. all required maintenance performed on air pollution control and monitoring equipment.
40 CFR 63.6655(b); 40 CFR 63.10(b); and 40 CFR 63.8(d)	Keep records for each CEMS or CPMS used to demonstrate compliance, including: the performance evaluation test plan; previous versions of the performance test plan; performance tests and evaluations; results of the quality control program; CMS calibration checks; maintenance performed on air pollution control and monitoring equipment; the occurrence, duration, and corrective actions taken during periods of malfunction; and all measurements needed to demonstrate compliance with the relevant standard.
40 CFR 63.6655(d)	Keep the records required in Table 6 to 40 CFR Part 63, Subpart ZZZZ to demonstrate continuous compliance.
40 CFR 63.6625(b)(6) and 40 CFR 63.10(c)	Maintain records of any malfunction, repairs, and corrective actions taken of/to the CPMS and any parameter monitoring exceedances, as identified by 40 CFR 63.10(c).
40 CFR 63.6625(h)	Maintain a record of each idle and/or startup time that exceeded 30 minutes.
40 CFR 63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 40 CFR 63.10(b)(1).

e) Reporting Requirements

- (1) The permittee shall submit deviation 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.

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

- (2) A comprehensive written report on the results of the performance tests, conducted to demonstrate compliance with 40 CFR 63.6603(a), shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 60 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-15-04(A)]

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



Applicable Rule	Requirement
40 CFR 63.6640(b)	Submit a report of each instance in which the emission limitation or operating limitations in Tables 2d and 1b were not met; these deviations to be reported according to the requirements of 40 CFR 63.6650.
40 CFR 63.6640(e)	Submit a report of each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.
40 CFR 63.6645(a)(2)	Submit all notifications required per 40 CFR 63.7(b) and (c); 40 CFR 63.8(e), (f)(4), and (f)(6); and 40 CFR 63.9(b) through (e), (g), and (h) that apply to the SI RICE.
40 CFR 63.6625(b); 40 CFR 63.7(c); and 40 CFR 63.8(d) & (e)(3)	Upon request, submit a performance evaluation test plan for each monitoring system and/or the site-specific test plan to the office requesting it.
40 CFR 63.6645(g); 40 CFR 63.7(b); 40 CFR 63.8(e); and 40 CFR 63.9(e) & (g)	Submit a Notification of Intent to conduct a performance test for the emissions unit or a performance evaluation of the CMS at least 60 days before the test is scheduled to begin.
40 CFR 63.6645(h); 40 CFR 63.6630(c); 40 CFR 63.8(e)(5); 40 CFR 63.9(h); 40 CFR 63.10(d)(2) & (e)(2); and OAC rule 3745-15-04(A)	Submit a Notification of Compliance Status for each compliance demonstration required in Tables 3 and 5 of Subpart ZZZZ, including the performance test and CMS performance evaluation results, before the close of business on the 60 th day following the completion of the test; or within 30 days of the initial compliance demonstration if the demonstration does not include a performance test. OAC rule 3745-15-04(A) requires performance test results to be submitted within 30 days of the test date unless additional time is requested.
40 CFR 63.6650(a)	Submit each applicable report in Table 7 of Subpart ZZZZ.
40 CFR 63.6650(b)(1) to (5) and Subpart ZZZZ Table 7 #1	Following the initial compliance date, submit Semiannual Compliance Reports to include the information identified in 63.6650(c) through (f), as applicable to the SI ICE. Following the initial compliance report, each subsequent report shall cover the reporting period from January 1 st through June 30 th and July 1 st through December 31 st . The Semiannual Compliance Reports must be postmarked or delivered no later than July 31 st and January 31 st .
40 CFR 63.6650(c)	40 CFR 63.6650(c) contains the required information to be submitted in each compliance report.
40 CFR 63.6650(d) & (e)	40 CFR 63.6650(d) contains the required information to be submitted for each deviation from an emission or operating limitation not monitored by a continuous monitoring system (CMS) and 63.6650(e) contains the information needed when using a CMS to comply with the emission or operating limitation.



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

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

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

b. Emission Limitation:

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

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.0095 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-3 (7/00) for PM₁₀ (filterable).

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

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

c. Emission Limitation:

Following the compliance date of 10/19/13, emissions of formaldehyde shall not exceed 2.7 ppmvd at 15% O₂ or emissions of formaldehyde shall be reduced by 76% or more.

Applicable Compliance Method:

Unless a performance test is submitted that meets the requirements of 40 CFR 63.6612(b), the permittee shall conduct an initial performance test within 180 days after the compliance date or no later than 04/19/14, to demonstrate compliance with the formaldehyde limitation in the NESHAP. The appropriate tests methods from Table 4 of Subpart ZZZZ shall be conducted based on the



option chosen for compliance, i.e., the part per million concentration or percent reduction. The appropriate emission and/or operating limitations, required per 40 CFR 63.6630 and identified in Table 5, shall be established and compliance demonstrated during each performance test.

The temperature at the inlet to the catalyst of the NSCR shall be monitored during the performance test and maintained between 750 °F and 1,250 °F. The CPMS, installed to measure the temperature at the inlet to the NSCR catalyst, shall complete one cycle of operation for each successive 15-minute period of operations, with a minimum of 4 successive cycles or operation for each valid hour of testing, and in accordance with 40 CFR 63.6625(b). The 3-hour block average temperature at the inlet to the catalyst shall be documented during performance tests and the pressure drop shall be recorded to establish the operating range for the pressure drop across the catalyst. Per 63.6640(b), if the catalyst is changed or the control device replaced, a new performance test must be conducted to demonstrate compliance with the emission limitation and to reestablish the values for, or compliance with, the operating parameters.

Each performance test shall consist of 3 separate test runs and each test run shall last a minimum of 1 hour and shall be conducted during normal operations. The engine percent load, during the performance test, shall be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load; and the estimated percent load shall be included in the notification of compliance.

A compliant performance test shall demonstrate that either the formaldehyde emissions have been reduced by 76% or that the average formaldehyde concentration is less than or equal to 2.7 ppmvd, corrected to 15 percent O₂ on a dry basis, and from three 1-hour or longer performance test runs.

The following test methods shall be employed to demonstrate compliance with the emission limitation or control requirement for formaldehyde:

- i. Method 1 or 1A of 40 CFR Part 60, Appendix A to select the sampling port location and the number of traverse points.
- ii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A or ASTM Method D6522-00 to measure O₂ at the inlet and outlet of the control device to normalize the formaldehyde concentration(s).
- iii. Method 4 of 40 CFR Part 60, Appendix A or Method 320 of 40 CFR Part 63, Appendix A or ASTM D6348-03 to measure the moisture content at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure the moisture content of the stationary RICE exhaust.
- iv. Method 320 or Method 323 of 40 CFR Part 63, Appendix A or ASTM D 6348-03 to measure formaldehyde at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure formaldehyde at the exhaust of the stationary ICE.



- v. The following equation shall be used to normalize the formaldehyde concentrations to a dry basis and to 15 percent oxygen (O₂)**:

$$C_{adj} = C_d (5.9 / 20.9 - \% O_2)$$

where:

C_{adj}= calculated formaldehyde concentration adjusted to 15 percent O₂;

C_d= measured concentration of formaldehyde, uncorrected;

5.9 = 20.9 percent O₂ – 15 percent O₂, the defined O₂ correction value, percent; and

%O₂ = measured O₂ concentration, dry basis, percent.

** Optionally, the pollutant concentrations can be corrected to 15% O₂ using a CO₂ correction factor, by calculating the fuel factor (F_o value) using Method 19 results obtained during the performance test (40 CFR 63.6620(e)(2)).

- vi. If compliance is demonstrated for the control efficiency for formaldehyde, the following equation shall be used to determine the percent reduction:

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

where:

C_i= concentration of formaldehyde at the control device inlet;

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

R = percent reduction of formaldehyde emissions.

The permittee shall conduct subsequent performance tests for formaldehyde (concentration or % reduction) every 8,760 hours of operation or every 3 years, whichever comes first.

The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of each scheduled performance test date at least 60 calendar days before it is scheduled, to allow the agency time to review and approve the site-specific test plan and to arrange for an observer to be present during the compliance demonstration.

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



A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 60 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

[Authority for term: 40 CFR 63.7(a)(2), (b)(1), and (e)(3), 40 CFR 63.6603(a), 40 CFR 63.6612, 40 CFR 63.6615, 40 CFR 63.6620, 40 CFR 63.6630, 40 CFR 63.6640(a) and (b), 40 CFR 63.6645(a)(2), Part 63, Subpart ZZZZ, Table 2d #10; Table 1b; Table 3 #4; Table 4 #2 or #3; Table 5 #4 or #6; and Table 6 #10, and OAC rule 3745-15-04(A)]

- g) Miscellaneous Requirements
 - (1) None.