



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
HOCKING COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

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Lazarus Gov. Center  
P.O. Box 1049

**Application No: 06-05478**

**DATE: 1/13/2004**

Columbia Gas Transmission Corporation  
Mike Hoffman  
1700 MacCorkle Ave SE  
Charleston, WV 43155

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

SEDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 1/13/2004  
Effective Date: 1/13/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 06-05478

Application Number: 06-05478  
APS Premise Number: 0637000043  
Permit Fee: **\$100**  
Name of Facility: Columbia Gas Transmission Corporation  
Person to Contact: Mike Hoffman  
Address: 1700 MacCorkle Ave SE  
Charleston, WV 43155

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**2351 State Route 56  
South Bloomingville, Ohio**

Description of proposed emissions unit(s):  
**TEG dehydrator with reboiler and flare.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

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

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

#### **3. Records Retention Requirements**

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.

#### **4. 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.

**5. 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).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

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**PTI Application: 06-05478**  
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Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

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

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

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modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **14. Construction Compliance Certification**

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

#### **15. Fees**

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

### **B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	5.68
Nox	10.9
VOC	7.69
CO	8.8

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Limitations/Control Measures</u>	<u>Emissions</u>
B003 - TEG dehydrator with reboiler and flare.	OAC rule 3745-31-05	Emissions of nitrogen oxides (NOx) shall not exceed 0.26 pound/hour; 1.2 TPY.	
		Emissions of carbon monoxide (CO) shall not exceed 0.5 pound/hour; 2.2 TPY.	
		Emissions of volatile organic compounds (VOC) shall not exceed 1.12 pound/hour; 4.89 TPY .	
		There shall be no visible particulate emissions from the flare.	
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1) and OAC rule 3745-17-07(A).	
	OAC rule 3745-17-07(A)	Visible particulate emissions from the reboiler combustion stack shall not exceed 20 percent opacity as a six minute average.	
	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not	

exceed 0.020 pound/MMBTU;  
0.16 TPY.

## **2. Additional Terms and Conditions**

### **2.a**

## **B. Operational Restrictions**

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

## **C. 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 flare shall be equipped with a thermocouple (Flame Presence Sensor) to continuously monitor the flare's pilot flame and assure proper flare operation.
3. The permittee shall maintain the following records for each day the emissions unit is operated:
  - a. The operating times for the flare, monitoring equipment, and the associated emissions unit;  
and
  - b. All periods during which there was no pilot flame.

## **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. Semiannually, the permittee shall submit deviation (excursion) reports that identify all time periods during which the pilot flame was absent or the flare was not functioning properly while the emissions unit was operating and all periods when visible emissions were observed from the emissions unit.

## **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be

determined in accordance with the following method(s):

a. Emission Limitation

Particulate emissions (PE) shall not exceed 0.020 pound/MMBTU; 0.16 TPY.

Applicable Compliance Method

Compliance with the allowable mass emission rate for PE shall be determined by multiplying an emission factor of 4.5 pounds of PE per million cubic feet of natural gas burned. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with test method 5 specified in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

The annual emission limitation was developed by multiplying the allowable emission rate by the rated capacity of the unit to determine maximum hourly emissions. This was multiplied by the maximum annual hours of operation (8,760 hours) and divided by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

b. Emission Limitation

Emissions of nitrogen oxides (NO<sub>x</sub>) shall not exceed 0.26 pound/hour; 1.2 TPY.

Applicable Compliance Method

Compliance with the allowable mass emission rate for NO<sub>x</sub> shall be determined by multiplying an emission factor of 100 pounds of NO<sub>x</sub> per million cubic feet of natural gas burned. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-3. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with test method 7 or 7E specified in "Appendix on Test Method" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

The annual emission limitation was developed by multiplying the allowable hourly emission rate by the maximum annual hours of operation (8,760 hours) and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation

Emissions of volatile organic compounds (VOC) shall not exceed 1.12 pound/hour; 4.89 TPY.

Applicable Compliance Method

VOC and HAP emissions shall be determined by using the simulation model GRIGLYCalc Version 3.0 or equivalent, representative dehydrator operating conditions and wet gas analyses, hydrocarbon destruction efficiencies of 98% for the flare, and AP-42 emission factors to account for products on incomplete fuel combustion.

The annual emission limitation was developed by multiplying the allowable hourly emission rate by the maximum annual hours of operation (8,760 hours) and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

d. Emission Limitation

Emissions of carbon monoxide (CO) shall not exceed 0.5 pound/hour; 2.2 TPY.

Applicable Compliance Method

Compliance with the allowable mass emission rate for CO shall be determined by multiplying an emission factor of 21.0 pounds of CO per million cubic feet of natural gas burned. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with test method 10 specified in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

The annual emission limitation was developed by multiplying the allowable hourly emission rate by the maximum annual hours of operation (8,760 hours) and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation

Visible particulate emissions from the reboiler combustion stack shall not exceed 20 percent opacity as a six minute average.

Applicable Compliance Method

Compliance with the visible emission limit shall be determined through visual emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). No visible emission testing is

specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

f. Emission Limitation

There shall be no visible particulate emissions from the flare.

Applicable Compliance Method

Compliance with the visible emission limitation for the flare shall be determined in accordance with 40 CFR 60, Appendix A, Method 22. No visible emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

**F. Miscellaneous Requirements**

None