

Facility ID: 0634000110 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0634000110 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - A 25 MMcf/d Natural Gas TEG Dehydration System vented to a Thermal Oxidizer	OAC rule 3745-31-05(A)(3)(b) (PTI 06-08300 issued 7/12/07)	See Section A.2.b. below.
	ORC rule 3704.03(T)(4)	See Section A.2.a. below.
	OAC rule 3745-17-07(A)(1)	Visible emissions from any stack shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/million Btu actual heat input.
	OAC rule 3745-18-06(G)	Exempt. See Section A.2.c below.
	OAC rule 3745-21-08(B)	See Section A.2.d below.
	OAC rule 3745-21-07(G)(2)	See Section A.2.e below.

2. Additional Terms and Conditions

- (a) The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) do not apply to the particulate, NOx, SO2 and CO emissions from this air contaminant source since the uncontrolled potential to emit for particulate, NOx, SO2 and CO emissions are less than ten tons per year. Permit to Install 06-08300 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
 - i. all emissions shall be vented to a thermal oxidizer which shall reduce OC emissions by 95%.
 - ii. Emissions of OC shall not exceed 9.9 tons per year.

This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B). The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

The permittee shall not employ any photochemically reactive materials in this emissions unit. Pursuant to OAC rule 3745-21-07(G)(9)(f), this emissions unit is exempt from the emission limitations and control requirements specified in OAC rule 3745-21-07(G)(2).

B. Operational Restrictions

1. The average combustion temperature within the Oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall be at least 1400 degrees Fahrenheit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - the color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.
2. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within + 1 percent of the temperature being measured or + 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average combustion temperature within the thermal oxidizer, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:
 - all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance; and
 - a log of the downtime for the capture (collection) system, thermal oxidizer, and monitoring equipment when the associated emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that:
 - identify all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit and,
 - describe any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Ohio EPA, Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - each period of time when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer;
 - an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly 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.

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 methods:
Emission Limitation:

Emissions of OC shall not exceed 9.9 tons per year.

Applicable Compliance Method:

Compliance with the lb/hour OC emissions limitation shall be demonstrated by the use of permittee's GLYCalc data provided in the PTI application. The TPY emissions limitation shall be determined by multiplying the hourly emission rate by 8760 hours per year.

If required, compliance shall be determined using the following test method: 40 CFR Part 60, Appendix A, Method 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

Emission Limitation:

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

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources" as such appendix existed on July 1, 2002.

Emission Limitation:

Particulate emissions (PE) shall not exceed 0.020 lb/million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.0075 lb/million Btu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

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

F. **Miscellaneous Requirements**

1. None