

# Statement of Basis For Title V Permit

Part I - General	
Company Name	Columbia Gas Transmission - Miley Compressor Station
Premise Number	02-38-00-0050
What makes this facility a Title V facility?	Major for NOx emissions.
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	See explanation of changes below.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		<u>Comments</u>
	SIP (3745- )	Other	

C

**Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

Part III (Requirements Within the State and Federally Enforceable Section)
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Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	E T	Misc	<u>Comments</u>
		SIP (3745- )	Other												
B003, B004, B005	0.35 lb/MMBtu 0.062 lb/MMBtu PE	17-11		N	Y	Y	N	N	Y	N	Y	N	N	N	These natural gas-fired engines are inherently clean burning, emit virtually no particulate matter and exhibit no visible emissions during normal operations. Duel limits in the permit as Ohio PE limit tightened but the change has not yet been accepted in the SIP. OR - restricted to the use of natural gas only as fuel. Uncontrolled - no CAM M, R, Rp - based on the restriction to burn only NG. ET - None - per Ohio EPA Engineering Guide 16; permit states if required, Method 1-5.
B006	0.25 lb/MMBtu, and 1.1 TPY PE		31-05(A)	N	Y	Y	N	N	Y	N	Y	N	N	N	This natural gas-fired engine is inherently clean burning, emit virtually no particulate matter and exhibit no visible emissions during normal operations. OR - restricted to the use of natural gas only as fuel. Uncontrolled - no CAM M, R, Rp - based on the restriction to burn only NG. ET - None - per Ohio EPA Engineering Guide 16; permit states if required, Method 1-5.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	E T	Misc	Comments
		SIP (3745- )	Other												
B003, B004, B005, B006	20% opacity	17-07(A)		N	N	N	N	N	N	N	N	N	N	N	This natural gas-fired boiler is inherently clean burning, emit virtually no particulate matter and exhibit no visible emissions during normal operations.  ET - None - per Ohio EPA Engineering Guide 16
B003, B004, B006	SO2 exemption	18-06		Y	N	N	N	N	N	N	N	N	N	N	Exempt from limit as Eu is less than 10 MMBtu.
B005	0.5 lb/MMBtu SO2	18-16(G)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Uncontrolled - no CAM M, R, Rp - based on the restriction to burn only NG. ET - None - per Ohio EPA Engineering Guide 16
B006	0.5 lb/MMBtu SO2 2.19 TPY		31-05(A)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Uncontrolled - no CAM M, R, Rp - based on the restriction to burn only NG. ET - None - per Ohio EPA Engineering Guide 16
B006	1.72 lb/MMBtu and 7.52 TPY NOx	31-05(A)		N	N	N	N	N	N	N	N	N	N	N	Unit is uncontrolled. Emissions calculate by manufacture emission data. OR - Uncontrolled - no CAM ET - None - per Ohio EPA Engineering Guide 16
P001	1.55 lbs/hr OC 0.23 lb/hr toluene 0.11 lb/hr xylene 0.16 lb/hr benzene 0.55 lb/hr total HAP		31-05	N	Y	Y	N	N	Y	N	Y	N	N	N	BAT requirement to reduce VOC and HAP emissions M - monitoring of the flare pilot flame to insure operation. OR - use of flare with 95% destruction with no visible emissions more than 5 min/hr; used when the heat >200 Btu/scf; used all times emissions vented to it; exit velocity to met 40 CFR 60.18. M & R - Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. Record each instance there was not pilot flame when the unit was in operation; Rp - Semiannual report of all flame outs during operation of the unit. Semiannual report of any VE. ET- None - per Ohio EPA Engineering Guide 16

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	E T	Misc	<u>Comments</u>
		SIP (3745- )	Other												
P001	0.020 lb/MMBtu	17-11		N	Y	Y	N	N	Y	N	Y	N	N	N	This natural gas-fired boiler is inherently clean burning, emit virtually no particulate matter and exhibit no visible emissions during normal operations. OR - restricted to the use of natural gas only as fuel. Uncontrolled - no CAM M, R, Rp - based on the restriction to burn only NG. ET - None - per Ohio EPA Engineering Guide 16
P001	20% opacity	17-07(A)		N	N	N	N	N	N	N	N	N	N	N	This natural gas-fired boiler is inherently clean burning, emit virtually no particulate matter and exhibit no visible emissions during normal operations. M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. R - semi-annual when visible emissions noted ET - None - per Ohio EPA Engineering Guide 16
P001	Rule exemption	21-07(G)		Y	N	Y	N	N	Y	N	Y	N	N	N	This unit is exempt as material is not photochemically reactive material, as defined in rule. M R Rp - based upon the requirement to use only non-PRM.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

**C Instructions for Part III:**

C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and

condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section. If OAC rule 3745-31-05 is cited in the “Other” column, please indicate in the “Comments” section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M,” “R,” “Rp,” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. If a brief explanation is provided in the “Comments” section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the “Comments” section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the “Monitoring,” “Record Keeping,” or “Reporting” requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the “Monitoring,” “Record Keeping,” or “Reporting” requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the “Comments” section would be sufficient.

Also, if a “Y” is noted under “OR,” “Misc,” “St,” “ND,” or “ENF” an explanation of the requirements must be provided in the “Comments” section. In addition to a general explanation of the “OR,” “Misc,” “St,” “ND,” and/or “ENF” the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

- C Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.

**02-38-00-0050**

**Title V Renewal - Explanation of Changes.**

Background

The BAT limits for EU P001 were moved in a Significant Title V permit modification (6/8/00) to the federally enforceable side in order to synthetic minor out of the Natural Gas and Oil Production MACT, Subpart HH (6/17/99).

With the federally enforceable limits for the dehydrator, the facility HAP emissions are below the MACT thresholds; therefore, the Reciprocating Internal Combustion Engine MACT, Subpart ZZZZ, (6/15/04) and the IC Boiler and process heater MACT, Subpart DDDDD, do not apply to this facility.

Facility was inspected 3/22/05 and is now in compliance with the T&C of the Title V and all PTIs.

CAM does not apply to B003, B004, B005 and B006 because the units are uncontrolled. CAM does not apply to P001 as the flare requirements are federally enforceable (to avoid Natural Gas and Oil (MACT) and thus reduce the PTE below the major thresholds.

Facility-wide

1. Added Z005 1000 gal. reboiler water tank with flare, based upon compliance inspection. Not currently in use.

B003, B004 and B005

1. Addition of PTI and BAT that was not included in previous Title V permits.
2. Change the MMBtu/hr rating to reflect revised calculations converting bhp to heat input.
3. Revise AP-42 emission factors to reflect current version.

B006

1. Addition of PTI and BAT that was not included in previous Title V permits. Added the associated NOX and SO2 testing requirements, based upon AP-42 and manufacture emission factors supplied by the facility.

P001

1. Moved OC and HAP limits from the Operational Restrictions to the Additional Term section.
2. Moved flare operating requirements from the Additional Terms to the Operational Restrictions section.
3. Added daily VE observations from flare and semi-annual reports of any visible emissions noted and associated corrective action.
4. Added a natural gas operational restriction and the associated monitoring, recordkeeping and reporting.
5. Added a PRM use monitoring and recordkeeping term. Operational restriction and reporting were in the previous Final Title V.