



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

03/21/05

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

15-76-00-1799
East Ohio Gas - Robinson Station
Sam S. Mathew
625 Liberty Avenue
Pittsburgh, PA 15222-3199

Dear Sam S. Mathew:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Canton Division of Air Pollution Control within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to this office at the following address:**

**Ohio EPA, Division of Air Pollution Control
Permit Issuance and Data Management Section
Draft Title V Permit Correspondence
122 South Front Street
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Canton Division of Air Pollution Control.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PMU
Canton Division of Air Pollution Control
Pennsylvania
West Virginia



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 03/21/05

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 15-76-00-1799 to:
East Ohio Gas - Robinson Station
5433 West Blvd
Canton, OH 44718

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include P001, P002, P003, P004, P005, P006, Z009, Z010, and Z025.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

OHIO ENVIRONMENTAL PROTECTION AGENCY

Joseph P. Koncelik
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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 A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

- i. The date, place (as defined in the permit), and time of sampling or measurements.
- ii. The date(s) analyses were performed.
- iii. The company or entity that performed the analyses.
- iv. The analytical techniques or methods used.
- v. The results of such analyses.
- vi. 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:

- i. **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 by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction constitutes a violation of an emission limitation (or control requirement) and, therefore, 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))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II 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 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 reports shall satisfy the requirements (in part) 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. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

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 overrides the reporting requirements specified in this General 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 the requirements (in part) 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 General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

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

- iii. **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 General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be

submitted 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.

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 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 General Term and Condition A.1.c.ii 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))

- iv. 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))
- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. **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 General Term and Condition A.1.c.i above.

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

3. **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))

4. 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))

5. 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))

6. 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 A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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))

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

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

10. 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))

11. 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))

12. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. 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.
 - iii. 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))

13. 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))

14. 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))

15. 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))

16. 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. 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))

17. 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.)

18. Insignificant Activities

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

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

19. 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))

20. 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))

21. 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 by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If 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 monitoring, record keeping, reporting, or testing 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.

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 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 General Term and Condition A.1.c.ii;
- 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; and
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z007 - north pipeline heater, 4.0 MMBtu/hr natural gas-fired;
Z008 - south pipeline heater, 4.0 MMBtu/hr natural gas-fired; and
Z011 - Boiler #1, 1.55 MMBtu/hr natural gas-fired.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z012 - auxiliary water pump - Pump #1;
Z013 - air compressor - Compressor #1;
Z014 - Tank #96, 4200-gallon crude oil tank;
Z015 - Tank #97, 4200-gallon crude oil tank;
Z016 - Tank #98, 4200-gallon crude oil tank;
Z017 - Tank #99, 4200-gallon crude oil tank;
Z018 - Tank #100, 4200-gallon waste oil tank;
Z019 - Tank #101, 5000-gallon lube oil tank;
Z020 - Tank #102, 5000-gallon lube oil tank;
Z021 - Tank #103, 4200-gallon lube oil tank;
Z022 - Tank #104, 2500-gallon coolant tank;
Z023 - Tank #105, 2500-gallon coolant tank; and
Z024 - four transition vents (one for each engine).

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine #1, Unit 4801 (P001)

Activity Description: Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T, 1350 HP rated power output, 11.5 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Cooper-Bessemer Model GMV10-T, natural gas-fired, 2-cycle lean burn, large bore reciprocating internal combustion engine, with a maximum rated heat input capacity of 11.5 MMBtu/hr, which drives compressor unit 4801 for natural gas underground storage.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions (PE) shall not exceed 0.35 lb/MMBtu of actual heat input. See section A.1.2.a below.
	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/MMBtu of actual heat input. See section A.1.2.b below.
	OAC rule 3745-18-06(G)	Pursuant to OAC rule 3745-18-06(A) (only firing natural gas), this emissions unit is exempt from the emission limitation specified by this rule.

2. Additional Terms and Conditions

- The requirement to comply with this PE limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/MMBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- This PE limitation shall be effective and federally enforceable on the date the U.S. EPA approves this PE limitation as a revision to the Ohio SIP for particulate matter.

II. Operational Restrictions

- The permittee shall only fire pipeline quality natural gas as fuel in this emissions unit.

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

III. Monitoring and/or Record Keeping Requirements

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

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired 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))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit 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 method and procedures specified in OAC rule 3745-17-03(B)(1).

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

- 1.b Emission Limitation:

PE shall not exceed 0.35 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance may be demonstrated 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, 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).

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

- 1.c Emission Limitation:

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

Applicable Compliance Method:

Compliance may be demonstrated 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, 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).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine #2, Unit 4802 (P002)

Activity Description: Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T, 1350 HP rated power output, 11.5 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Cooper-Bessemer Model GMV10-T, natural gas-fired, 2-cycle lean burn, large bore reciprocating internal combustion engine, with a maximum rated heat input capacity of 11.5 MMBtu/hr, which drives compressor unit 4802 for natural gas underground storage.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions (PE) shall not exceed 0.35 lb/MMBtu of actual heat input. See section A.1.2.a below.
	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/MMBtu of actual heat input. See section A.1.2.b below.
	OAC rule 3745-18-06(G)	Pursuant to OAC rule 3745-18-06(A) (only firing natural gas), this emissions unit is exempt from the emission limitation specified by this rule.

2. Additional Terms and Conditions

- The requirement to comply with this PE limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/MMBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- This PE limitation shall be effective and federally enforceable on the date the U.S. EPA approves this PE limitation as a revision to the Ohio SIP for particulate matter.

II. Operational Restrictions

- The permittee shall only fire pipeline quality natural gas as fuel in this emissions unit.

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

III. Monitoring and/or Record Keeping Requirements

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

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired 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))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit 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 method and procedures specified in OAC rule 3745-17-03(B)(1).

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

- 1.b Emission Limitation:

PE shall not exceed 0.35 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance may be demonstrated 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, 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).

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

- 1.c Emission Limitation:

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

Applicable Compliance Method:

Compliance may be demonstrated 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, 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).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine #3, Unit 4803 (P003)

Activity Description: Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T, 1350 HP rated power output, 11.5 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Cooper-Bessemer Model GMV10-T, natural gas-fired, 2-cycle lean burn, large bore reciprocating internal combustion engine, with a maximum rated heat input capacity of 11.5 MMBtu/hr, which drives compressor unit 4803 for natural gas underground storage.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions (PE) shall not exceed 0.35 lb/MMBtu of actual heat input. See section A.1.2.a below.
	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/MMBtu of actual heat input. See section A.1.2.b below.
	OAC rule 3745-18-06(G)	Pursuant to OAC rule 3745-18-06(A) (only firing natural gas), this emissions unit is exempt from the emission limitation specified by this rule.

2. Additional Terms and Conditions

- The requirement to comply with this PE limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/MMBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- This PE limitation shall be effective and federally enforceable on the date the U.S. EPA approves this PE limitation as a revision to the Ohio SIP for particulate matter.

II. Operational Restrictions

- The permittee shall only fire pipeline quality natural gas as fuel in this emissions unit.

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

III. Monitoring and/or Record Keeping Requirements

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

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired 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))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit 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 method and procedures specified in OAC rule 3745-17-03(B)(1).

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

- 1.b Emission Limitation:

PE shall not exceed 0.35 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance may be demonstrated 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, 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).

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

- 1.c Emission Limitation:

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

Applicable Compliance Method:

Compliance may be demonstrated 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, 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).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Engine #4, Unit 4804 (P004)

Activity Description: Cooper-Bessemer, 2-Cycle Lean Burn, Internal Combustion Engine, Model GMV10-T, 1350 HP rated power output, 11.5 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Cooper-Bessemer Model GMV10-T, natural gas-fired, 2-cycle lean burn, large bore reciprocating internal combustion engine, with a maximum rated heat input capacity of 11.5 MMBtu/hr, which drives compressor unit 4804 for natural gas underground storage.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions (PE) shall not exceed 0.35 lb/MMBtu of actual heat input. See section A.1.2.a below.
	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/MMBtu of actual heat input. See section A.1.2.b below.
	OAC rule 3745-18-06(G)	Pursuant to OAC rule 3745-18-06(A) (only firing natural gas), this emissions unit is exempt from the emission limitation specified by this rule.

2. Additional Terms and Conditions

- 2.a** The requirement to comply with this PE limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/MMBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.b** This PE limitation shall be effective and federally enforceable on the date the U.S. EPA approves this PE limitation as a revision to the Ohio SIP for particulate matter.

II. Operational Restrictions

- The permittee shall only fire pipeline quality natural gas as fuel in this emissions unit.

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

III. Monitoring and/or Record Keeping Requirements

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

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired 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))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit 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 method and procedures specified in OAC rule 3745-17-03(B)(1).

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

- 1.b Emission Limitation:

PE shall not exceed 0.35 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance may be demonstrated 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, 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).

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

- 1.c Emission Limitation:

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

Applicable Compliance Method:

Compliance may be demonstrated 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, 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).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Turbine #1, Unit 4805 (P005)

Activity Description: Solar Centaur Gas Turbine, Model T3002R, 3730 HP rated power output, 29.0 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Solar Centaur Model T3002R, natural gas-fired turbine, with a maximum rated heat input capacity of 29.0 MMBtu/hr, which drives compressor unit 4805 for natural gas underground storage.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(4)	Particulate emissions (PE) shall not exceed 0.040 lb/MMBtu of actual heat input.
	OAC rule 3745-18-06(F)	Pursuant to OAC rule 3745-18-06(A) (only firing natural gas), this emissions unit is exempt from the emission limitation specified by this rule.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See section A.1.2.a below.

2. Additional Terms and Conditions

- The design of the emissions unit and the technology associated with the current operating practices will satisfy the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively.

II. Operational Restrictions

- The permittee shall only fire pipeline quality natural gas as fuel in this emissions unit.

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

III. Monitoring and/or Record Keeping Requirements

- For each day during which the permittee fires a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel fired in this emissions unit.

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired 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))

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit 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 method and procedures specified in OAC rule 3745-17-03(B)(1).

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

- 1.b Emission Limitation:

PE shall not exceed 0.040 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance may be demonstrated based upon an emission factor of 0.0019 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 3.1, Table 3.1-2a (4/00) for PM (filterable).

If required, compliance shall be demonstrated by emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Turbine #2, Unit 4806 (P006)

Activity Description: Solar Centaur Gas Turbine, Model T4002, 3830 HP rated power output, 36.8 MMBtu/hr rated heat input

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Solar Centaur Model T4002 natural gas-fired turbine, with a maximum rated heat input capacity of 36.8 MMBtu/hr, which drives compressor unit 4806 for natural gas underground storage.	OAC rule 3745-31-05(A)(3) (PTI 15-01187)	Particulate emissions (PE) shall not exceed 1.47 lbs/hr and 4.94 tpy.
		Nitrogen oxides (NOx) emissions shall not exceed 21.11 lbs/hr and 71.19 tpy.
		Carbon monoxide (CO) emissions shall not exceed 6.2 lbs/hr and 20.85 tpy.
		Compliance with this rule also includes compliance with OAC rules 3745-17-07(A), 3745-21-08(B), and 3745-23-06(B).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(4)	The emission limitation specified by this applicable rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06(F)	Pursuant to OAC rule 3745-18-06(A) (only firing natural gas), this emissions unit is exempt from the emission limitation specified by this rule.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See section A.1.2.a below.

2. Additional Terms and Conditions

- 2.a** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 15-01187.

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 has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 15-01187.

II. Operational Restrictions

1. The permittee shall only burn pipeline quality natural gas as fuel in this emissions unit.
(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 15-01187)
2. The maximum annual natural gas usage rate for this emissions unit shall not exceed 248 million cubic feet per rolling, 12-month period.
(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 15-01187)

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following monthly records:
 - a. the amount of natural gas employed in this emissions unit, in million cubic feet; and
 - b. the rolling, 12-month summation of the amount of natural gas employed in this emissions unit, in million cubic feet.
(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 15-01187)

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (exceedance) reports that identify any exceedance of the natural gas usage restriction for this emissions unit specified in section A.II.2 above.

The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.ii of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 15-01187)
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired 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) and PTI 15-01187)
3. The permittee shall submit annual reports that specify the amount of natural gas employed (in mmcf) by month and year in this emissions unit and the total particulate, NOx, and CO emissions for this emissions unit for the previous calendar year. The reports shall be submitted to the Canton City Health Department, Division of Air Pollution Control by February 15 of each year.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 15-01187)

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitations:
PE shall not exceed 1.47 lbs/hr and 4.94 tpy.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the particulate emission factor of 0.0019 lb/MMBtu from AP-42, 5th Edition, Compilation of Air Pollution Emission Factors, Chapter 3, Table 3.1-2a (4/00) by the emissions unit's maximum rated heat input capacity of 36.8 MMBtu/hr.

If required, compliance with the hourly emission limitation shall be demonstrated by emission tests performed in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

Compliance with the annual emission limitation shall be demonstrated by multiplying the particulate emission factor of 0.0019 lb/MMBtu from AP-42, 5th Edition, Compilation of Air Pollution Emission Factors, Chapter 3, Table 3.1-2a (4/00) by the heat content of the natural gas (1000 Btu/cubic foot), and by the actual natural gas fuel usage rate from section A.III, and then dividing by 2,000 lbs/ton.

(Authority for term: OAC rules 3745-17-03(B)(10) and 3745-77-07(C)(1) and PTI 15-01187)

- 1.b Emission Limitations:
NOx emissions shall not exceed 21.11 lbs/hr and 71.19 tpy.

Applicable Compliance Methods:

Compliance with the hourly emission limitation may be demonstrated by multiplying the NOx emission factor of 0.521 lb/MMBtu by the emissions unit's maximum rated heat input capacity of 36.8 MMBtu/hr. The NOx emission factor was obtained from the Alternative Control Techniques Document (NOx Emissions from Stationary Gas Turbines, EPA-453/R-93-007) for a Solar Centaur turbine.

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

Compliance with the annual emission limitation shall be demonstrated by multiplying the NOx emission factor of 0.521 lb/MMBtu from the Alternative Control Techniques Document (NOx Emissions from Stationary Gas Turbines, EPA-453/R-93-007) for a Solar Centaur turbine by the heat content of the natural gas (1000 Btu/cubic foot), and by the actual natural gas fuel usage rate from section A.III, and then dividing by 2,000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 15-01187)

- 1.c Emission Limitations:
CO emissions shall not exceed 6.2 lbs/hr and 20.85 tpy.

Applicable Compliance Methods:

Compliance may be demonstrated by multiplying the CO emission factor of 0.082 lb/MMBtu by the emissions unit's maximum rated heat input capacity of 36.8 MMBtu/hr. The CO emission factor was obtained from AP-42, 5th Edition, Compilation of Air Pollution Emission Factors, Chapter 3, Table 3.1-1 (4/00).

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

Compliance with the annual emission limitation shall be demonstrated by multiplying the CO emission factor of 0.082 lb/MMBtu from AP-42, 5th Edition, Compilation of Air Pollution Emission Factors, Chapter 3, Table 3.1-1 (4/00) by the heat content of the natural gas (1000 Btu/cubic foot), and by the actual natural gas fuel usage rate from section A.III, and then dividing by 2,000 lbs/ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 15-01187)

Facility Name: **Robinson Compressor Station**

Facility ID: **15-76-00-1799**

Emissions Unit: **Turbine #2, Unit 4806 (P006)**

V. Testing Requirements (continued)

- 1.d** Emission Limitation:
Visible particulate emissions from any stack serving this emissions unit 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 method and procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1) and PTI 15-01187)

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Aux. Generator #1 (Z009)

Activity Description: Waukesha Auxiliary Generator, 4-Cycle Rich Burn, Model 6WAKBU, 183 HP rated power output, 2.02 MMBtu/hr rated heat input. Source operates under Permit-by-Rule OAC 3745-31-03(A)(4).

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Waukesha Model 6WAKBU natural gas-fired, 4-cycle rich burn, auxiliary generator with a maximum rated heat input capacity of 2.02 MMBtu/hr.	OAC rule 3745-17-07(A)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average except as provided by the rule.
	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.25 lb/MMBtu of actual heat input.
	OAC rule 3745-17-11(B)(5)(a)	See section A.1.2.a below. Particulate emissions shall not exceed 0.310 lb/MMBtu of actual heat input.
	OAC rule 3745-18-06(G)	See section A.1.2.b below. Pursuant to OAC rules 3745-18-06(A) (only firing natural gas) and 3745-18-06(B) (heat input capacity less than 10 MMBtu/hr), this emissions unit is exempt from the emission limitation specified by this rule.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	None, see section A.1.2.c below.

2. Additional Terms and Conditions

- The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb/MMBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

2. Additional Terms and Conditions (continued)

- 2.c** The design of the emissions unit and the technology associated with the current operating practices will satisfy the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively.

II. Operational Restrictions

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

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

III. Monitoring and/or Record Keeping Requirements

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

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired 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))

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- 1.a** Emission Limitations:
Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

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

- 1.b** Emission Limitation:
Particulate emissions shall not exceed 0.25 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 USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-3 (7/00).

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).

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

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
Particulate emissions shall not exceed 0.310 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 USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-3 (7/00).

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).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Aux. Generator #2 (Z010)

Activity Description: Caterpillar Auxiliary Generator, 4-Cycle Lean Burn, Model 3412, 690 HP rated power output, 5.15 MMBtu/hr rated heat input. Source operates under Permit-by-Rule OAC 3745-31-03(A)(4).

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
Caterpillar Model 3412, natural gas-fired, 4-cycle lean burn, auxiliary generator, with a maximum rated heat input capacity of 5.15 MMBtu/hr.	OAC rule 3745-17-07(A)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average except as provided by the rule.
	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions shall not exceed 0.35 lb/MMBtu of actual heat input.
	OAC rule 3745-17-11(B)(5)(b)	See section A.I.2.a below. Particulate emissions shall not exceed 0.062 lb/MMBtu of actual heat input.
	OAC rule 3745-18-06(G)	See section A.I.2.b below. Pursuant to OAC rules 3745-18-06(A) (only firing natural gas) and 3745-18-06(B) (heat input capacity less than 10 MMBtu/hr), this emissions unit is exempt from the emission limitation specified by this rule.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	None, see section A.I.2.c below.

2. Additional Terms and Conditions

- The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/MMBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

2. Additional Terms and Conditions (continued)

- 2.c** The design of the emissions unit and the technology associated with the current operating practices will satisfy the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively.

II. Operational Restrictions

1. The permittee shall not operate this emissions unit more than 500 hours per rolling, 12-month period.
(Authority for term: OAC rules 3745-31-03(A)(4)(a) and 3745-77-07(A)(1))
2. The permittee shall only fire natural gas in this emissions unit.
(Authority for term: OAC rules 3745-31-03(A)(4)(a) and 3745-77-07(A)(1))

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month:
 - a. the total hours of operation for this emissions unit; and
 - b. the rolling, 12-month summation of the hours of operation for this emissions unit.(Authority for term: OAC rules 3745-31-03(A)(4)(a) and 3745-77-07(C)(1))
2. For each day during which the permittee fires a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel fired in this emissions unit.
(Authority for term: OAC rules 3745-31-03(A)(4)(a) and 3745-77-07(C)(1))

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the rolling, 12-month operating hours limitation specified in A.II.1 above.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
(Authority for term: OAC rule 3745-77-07(C)(1))
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was fired 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))

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average except as provided by the rule.

Applicable Compliance Method:
Compliance shall be determined through visible emission observations performed in accordance with the method and procedures specified in OAC rule 3745-17-03(B)(1).

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

V. Testing Requirements (continued)

1.b Emission Limitation:
Particulate emissions shall not exceed 0.35 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.0000771 lb/MMBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-2 (7/00).

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).

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

1.c Emission Limitation:
Particulate emissions shall not exceed 0.062 lb/MMBtu of actual heat input.

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.0000771 lb/MMBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.2, Table 3.2-2 (7/00).

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).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Fugitive VOCs (Z025)

Activity Description: Fugitive VOC emissions for the entire facility.

A. State and Federally Enforceable Section

I. 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>
Fugitive VOC emissions from connections, valves, open ended lines, and other components at the entire facility.	None	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a Gas Research Institute emission factors were used to estimate total fugitive VOC emissions for the entire facility. A table containing the emissions unit component count summary and a table containing the fugitive VOC and HAP emission calculations are maintained by the permittee.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	Robinson Compressor Station, East Ohio Gas Company, Dominion East Ohio
Premise Number	15-76-00-1799
What makes this facility a Title V facility?	> 100 TPY NOx
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)	Most recent insignificant emissions unit language was used. PTI 15-01187 was moved to the State/federal side of emissions unit P006. OAC rule 3745-18-06 was moved to the State/federal side for all emissions units. New language was added to emissions units P001 through P004, sections A.I.1, A.I.2, and A.V because the revised SIP for OAC rule 3745-17-11(B)(5) has not been approved by USEPA. Authority citations were added to all emissions units. This facility is not a major source for HAPs and, therefore, 40 CFR Part 63, Subparts HHH, YYYY, and ZZZZ and 40 CFR Part 64 do not apply to these emissions units.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.	77	N	SIP Insignificant emissions units are listed.

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)															
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	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P001, P002, P003 & P004 large bore IC engines with no control.	20 % opacity	17-07 (A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized.
	0.35 lb PE/mmBtu	17-11 (B)(5) (b)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized. To be replaced by 0.62 lb PE/mmBtu.
	0.062 lb PE/mmBtu	17-11 (B)(5) (b)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized. Awaiting SIP approval.

	>950 Btu/scf <0.6 lb/mmscf	18-06 (A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized.
P005 turbine engine, no control	20 % opacity	17-07 (A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized.
	1.16 lbs PE/hr	17-11 (B)(4)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized.
	>950 Btu/scf <0.6 lb/mmscf	18-06 (A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized.
P006 turbine engine, no control	20 % opacity	17-07 (A)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized.
	>950 Btu/scf <0.6 lb/mmscf	18-06 (A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - clean NG fuel requirement with M, R & P. M, R & P - CAM does not apply because no control is utilized.
	1.47 lbs PE/ hr 21.11 lbs NOx/hr 6.2 lbs CO/ hr	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis - OAC rule 3745-31-05(A)(3) established by PTI 15-1187 as issued March 19, 1997. All requirements were transferred. The hourly PE emissions limit was calculated by multiplying the 17-11(B)(4) EF of 0.040 lb PE/mmBtu times the turbine rating of 36.8 mmBtu/hr.
	4.94 tpy PE 71.19 tpy NOx 20.85 tpy CO	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis - OAC rule 3745-31-05(D) established by PTI 15-1187 as issued March 19, 1997. The annual emission limitations were established for PTI purposes to reflect the potential to emit for this emissions unit operating only with NG with usage OR limit of 248 mm cubic feet for a rolling 12-month period.
	0.040 lb PE/mmBtu	17-11 (B)(4)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	Basis - equivalent to BAT. OR - clean NG fuel requirement with M, R & P.

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.