



**LOUISVILLE METRO
AIR POLLUTION CONTROL DISTRICT
850 Barret Ave., Louisville, Kentucky 40204**

Title V Operating Permit

Permit No: 92-97-TV (R2)

Plant ID: 0223

Effective Date: 05/31/2010

Expiration Date: 05/31/2015

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

**Texas Gas Transmission, LLC
10327 Gaslight Way
Louisville, Kentucky 40299-2587**

The applicable procedures of District Regulation 2.16 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Responsible Official (RO): David Goodwin

Application Received: 3-3-2003,
5-9-2003, 7-22-2005,
11-7-2008, 8-6-2009

RO Title: VP-Compliance & Operations Services

Permit Writer: Bob Wesely

Application Numbers: 9356, 9420,
10472, 11178, 11376

Date Application Administratively Complete: 9-22-2005

Date of Public Notice: 02-05-2010

Air Pollution Control Office

Date of Proposed Permit: 03-10-2010

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Permit Revisions/Changes

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./Page No.	Description
N/A	1/23/2001	3/12/2000	Initial	Entire Permit	Initial Permit Issuance
R1	1/23/2001	3/12/2000	Administrative	Cover page	Corrected expiration date
R2	04/26/2010	2/05/2010	Renewal	Entire Permit	5 year Renewal, NO _x RACT Amend #2, Change RO
			Administrative	Pages: 5, 55	Insignificant activities paragraphs
				Pages: 27, 53, 54	Revised pollutant columns

Abbreviations and Acronyms

AFS	-	AIRS Facility Subsystem
AIRS	-	Aerometric Information Retrieval System
APCD	-	Air Pollution Control District
ASL	-	Adjusted Significant Level
atm	-	Atmosphere
BACT	-	Best Available Control Technology
Btu	-	British Thermal Unit
CEMS	-	Continuous Emission Monitoring System
CAAA	-	Clean Air Act Amendments (15 November 1990)
HAP	-	Hazardous Air Pollutant
hr	-	hour
lbs	-	Pounds
l	-	Liter
MACT	-	Maximum Achievable Control Technology
m	-	Meter
mg	-	Milligram
mm	-	Millimeter
MM	-	Million
MOCS	-	Management of Change System
NAICS	-	North American Industry Classification System
NSR	-	New Source Review
NO _x	-	Nitrogen oxides
NSPS	-	New Source Performance Standards
PM	-	Particulate Matter
PM ₁₀	-	Particulate matter less than 10 microns
ppm	-	Parts per million
PSD	-	Prevention of Significant Deterioration
PMP	-	Preventive Maintenance Plan
psia	-	Pounds per square inch absolute
RACT	-	Reasonably Available Control Technology
SC	-	Specific Condition
SIC	-	Standard Industrial Classification
SIP	-	State Implementation Plan
SO ₂	-	Sulfur dioxide
TAC	-	Toxic Air Contaminant
TAL	-	Threshold Ambient Limit
TAP	-	Toxic Air Pollutant
tpy	-	Tons per year
UTM	-	Universal Transverse Mercator
VOC	-	Volatile Organic Compound

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Louisville Metro Air Pollution Control District (LMAPCD) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of LMAPCD. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a current list of "insignificant activities."

Insignificant activities are defined in District Regulation 2.16, section 1.22, as of the date the permit was proposed for review by U.S.EPA, Region 4.

Insignificant activities identified in District Regulation 2.02, Section 2 may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.

Insignificant activities identified in District regulation 2.02, Section 2 shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

*US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960*

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.

5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement. (Regulation 2.16, sections 4.7.1 through 4.7.4)

6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)

7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.

8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation. (Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6)

If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall:

- a. Notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)
- b. Submit a current list of insignificant activities by April 15 of each year with the annual compliance certification, including an identification of the additions and removals of insignificant activities that occurred during the preceding year. (Regulation 2.16, section 4.3.5.3.6)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.

- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements. (Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record Keeping and Reporting Requirement** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. All semi-annual compliance reports shall include the following certification statement per Regulation 2.16.

- “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete”.
- Signature and title of company responsible official.

If a change in the “Responsible Official” (RO) occurs during the term of this permit, the owner or operator shall provide written notification (Form 9400-A and Form AP-0208) to the District within 30 calendar days following the date a change in the designated RO occurs for this facility.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 through June 30	August 29 th
July 1 through December 31	March 1 st ¹

Note:

- ¹ The date for leap years is February 29.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.

17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and Permit renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.
24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
 - a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.

- d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
 26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
 27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
 28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
 29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
 30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
 31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
 32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)
 33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
 34. **Startups, Shutdowns, and Upset Conditions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
 35. **Submittal of Reports, Data, Notifications, and Applications**
 - a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:
*Louisville Metro Air Pollution Control District
850 Barret Ave
Louisville, KY 40204-1745*

- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:

***US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104***

36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following:

Regulation	Title
1.01	General Provisions
1.02	Definitions
1.03	Abbreviations And Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Shutdowns, Malfunctions, Startups, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Minor Facility Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements

Regulation	Title
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

District Only Enforceable:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
5.01	Standards for Toxic Air Contaminants and Hazardous air Pollutants
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

37. **Stratospheric Ozone Protection Requirements** - Any facility having refrigeration equipment, including air conditioning equipment, which uses a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), and any facility which maintains, services, or repairs motor vehicles using a Class I or II substance as refrigerant must comply with all requirements of 40 CFR 82, Subparts A, B, and F. Those requirements include the following restrictions:
- a. Any facility having any refrigeration equipment normally containing fifty (50) pounds of refrigerant, or more, must keep servicing records documenting the date and type of all service and the quantity of any refrigerant added according to 40 CFR 82.166;
 - b. No person repairing or servicing a motor vehicle may perform any service on a motor vehicle air conditioner (MVAC) involving the refrigerant for such air conditioner unless the person has been properly trained and certified as provided in 40 CFR 82.34 and 40 CFR 82.40, and properly uses equipment approved according to 40 CFR 82.36 and 40 CFR 82.38, and complies with 40 CFR 82.42;
 - c. No person may sell or distribute, or offer for sale or distribution, any substance listed as a Class I or II substance in 40 CFR 82, Subpart A, Appendices A and B, except in compliance with 40 CFR 82.34(b), 40 CFR 82.42, and/or 40 CFR 82.166.

- d. No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release into the atmosphere any Class I or II substance used as a refrigerant in such equipment and no other person may open appliances (except MVACs as defined in 40 CFR 82.152) for service, maintenance, or repair unless the person has been properly trained and certified according to 40 CFR 82.161 and unless the person uses equipment certified for that type of appliance according to 40 CFR 82.158 and unless the person observes the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- e. No person may dispose of appliances (except small appliances, as defined in 40 CFR 82.152) without using equipment certified for that type of appliance according to 40 CFR 82.158 and without observing the practices set forth in 40 CFR 82.156 and 40 CFR 82.166;
- f. No person may recover refrigerant from small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152), except in compliance with the requirements of 40 CFR 82 Subpart F;
- g. If the permittee manufactures, transforms, imports, or exports, a Class I or II substance (listed in 40 CFR 82, Subpart A, Appendices A and B), the permittee is subject to all requirements as specified in 40CFR82 Subpart A, Production and Consumption Controls. (Regulation 2.16, section 4.1.5)

Emission Unit U1: Compressor Engines #1, #2, #3, #4, #5, and #6.

U1 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.42	Reasonable Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, & 5
40 CFR 63 Subpart A	General Provisions	§63.1 through §63.16
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	§63.6590 (a)(1)(i) & §63.6590(b)(3)

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.01	General Provisions	1, 2, 3, & 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1, 2, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4,5, & 6

U1 Equipment			
Emission Point	Description	Applicable Regulation	Control ID
E1	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed March 1950), vented out stack S1	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 5.01, 5.02, 5.11	N/A
E2	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed March 1950), vented out stack S2	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ 5.01, 5.02, 5.11	N/A

U1 Equipment			
Emission Point	Description	Applicable Regulation	Control ID
E3	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed March 1950), vented out stack S3	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 5.01, 5.02, 5.11	N/A
E4	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed March 1950), vented out stack S4	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 5.01, 5.02, 5.11	N/A
E5	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed January 1953), vented out stack S5	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 5.01, 5.02, 5.11	N/A
E6	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed January 1953), vented out stack S6	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 5.01, 5.02, 5.11	N/A

U1 Control Devices:

The six (6) Cooper-Bessemer Reciprocating Internal Combustion Engines (RICE), originally model GMW-6TF, for the six (6) natural gas compressors have been retrofitted with permanently installed Lean Emission Combustion (LEC) technology modifications, converting them to model GMW-6TFC. (See U1 Comment #3)

U1 Specific Conditions**S1. Standards** (Regulation 2.16, section 4.1.1)**a. NO_x**

- i. The owner or operator shall not allow the emission of gases into the atmosphere that contain three grams per brake horsepower-hour (3 g/bhp-hr) or more, based on a thirty (30) day rolling average period, of the pollutant NO_x, for internal combustion engines E1, E2, E3, E4, E5, and E6, as specified in the attached NO_x RACT Plan - Amendment #2. (Regulation 6.42, section 4.3)
- ii. The owner or operator shall comply with the all requirements of the attached NO_x RACT Plan - Amendment #2.

b. TAC

See U1 Comment #7.

c. TAP (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination, consisting of a routine operation and preventive maintenance program, for formaldehyde emissions.

d. HAP

The owner or operator is not required to limit HAPs emissions, because the engines are existing RICEs on which construction or reconstruction commenced prior to December 12, 2002. (40 CFR 63 Subpart ZZZZ, §63.6590(b)(3)) (See U1 Comment #6)

S2. Monitoring (Regulation 2.16, section 4.1.9.1)**a. NO_x**

The owner or operator shall monitor continuously, on a real time basis, the engine parameters listed in Element 7.A of the attached NO_x RACT Plan - Amendment #2, to ensure proper maintenance and functioning at industry acceptable conditions.

b. TAC

See U1 Comment #2.

c. TAP

- i. The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.
- ii. The owner or operator shall perform the routine preventative maintenance every 8,600 hours of engine operation. The actual preventative maintenance period shall not exceed the routine preventative maintenance time period by more than percent ten (10%), since the last routine maintenance period.
- iii. The owner or operator shall inspect, as a minimum, the items listed in section S3.c.

d. **HAP**

There are no monitoring requirements for this item. (See Comment U1 #6)

S3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **NO_x**

See attached NO_x RACT Plan – Amendment #2.

b. **TAC**

The owner or operator shall maintain a copy of MSDS for each TAC containing material used at this plant. (See U1 Comment #2)

c. **TAP**

The owner or separator shall, at a minimum, inspect and record the results of the below listed items.

- i. The name of the person performing the maintenance and the date the maintenance is performed.
- ii. Engine identification, manufacturer and model.
- iii. Total hours of engine operation.
- iv. Hours of engine operation since last maintenance.
- v. Engine oil pressure.
- vi. Engine oil “in and out temperatures.”
- vii. Items monitored on a real time basis per Element 7.A of NO_x RACT Plan – Amendment #2.
- viii. Summary of additional activities performed.

d. **HAP**

There are no record keeping requirements for this item.

S4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. **NO_x**

- i. The owner or operator shall submit semiannual compliance, annual compliance certification and emission inventory reports that include the information in this section and the information as required by the NO_x RACT Plan – Amendment #2. The compliance reports shall clearly identify any deviations from a permit requirement, and if no deviations occur in that report period, the owner or operator shall report a negative declaration. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See U1 Comment #5)
- ii. The annual emission inventory may count as the second semiannual compliance report so long as the annual emission inventory is received by District by the second semiannual compliance report due date, March 1, of each year. The owner or operator shall report semiannually the following.
 - 1) Emission Unit ID number and Emission point ID number
 - 2) The beginning and ending date of the reporting period
 - 3) Report any deviations from the permit requirements.

b. **TAC**

See U1 Comment #2.

c. **TAP**

There are no compliance reporting requirements for this equipment.

d. **HAP**

There are no compliance reporting requirements for this equipment.

U1 Comments

1. NO_x RACT Plan - Amendment #2 is attached to this permit and all requirements apply.
2. Since the company is a Title V source, the company is subject to STAR generic standard requirements.
3. The Lean Emission Combustion (LEC) technology modifications, completed prior to October 2002, consist of permanent modifications to the engines, including but not limited to the installation of a turbocharger, a scavenging air cooler, a high-energy ignition system, power cylinder head replacement, modifications to fuel systems, air system piping, natural gas piping, intake silencer, exhaust silencer and exhaust stack to accommodate the larger volume of intake air and exhaust gases.
4. The six (6) Cooper-Bessemer engines, numbers #1, #2, #3, #4, #5, and #6, were converted from model GMW-6TF engines to model GMW-6TFC, per construction permit 68-01-C.
5. The report periods and due dates for the semiannual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements
6. 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines does not require limits, because the engines are existing spark ignition, 2-stroke, lean burn, stationary RICE, on which reconstruction commenced prior to December 12, 2002, and therefore do not have to meet the requirements of the subpart and of subpart A of this part. No initial notification was required. [§63.6590(a)(1)(i) and §63.6590(b)(3)]
7. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.01, section 1.6.7)

Emission Unit U2: Compressor Engines #7, #8, and #9.

U2 Applicable Regulations:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.42	Reasonable Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, & 5
40 CFR 63 Subpart A	General Provisions	§63.1 through §63.16
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	§63.6590 (a)(1)(i) & §63.6590(b)(3)

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.01	General Provisions	1, 2, 3, & 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1, 2, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6

U2 Equipment			
Emission Point	Description	Applicable Regulation	Control ID
E7	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed December 1956), vented out stack S7	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 5.01, 5.02, 5.11	N/A
E8	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed October 1962), vented out stack S8	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 5.01, 5.02, 5.11	N/A
E9	One (1) Cooper-Bessemer natural gas fueled, 1,500 bhp, RICE, 2-stroke, lean burn engine, (installed September 1963), vented out stack S9	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 5.01, 5.02, 5.11	N/A

U2 Control Devices: The three (3) Reciprocating Internal Combustion Engines (RICE) originally model GMWA-6, for the three (3) natural gas compressors have been retrofitted with permanently installed Lean Emission Combustion (LEC) technology modifications, converting them to model GMWA-6C. (See U2 Comment #3)

U2 Specific Conditions**S1. Standards** (Regulation 2.16, section 4.1.1)**a. NO_x**

- i. The owner or operator shall not allow the emission of gases into the atmosphere that contain three grams per brake horsepower-hour (3 g/bhp-hr) or more, based on a thirty (30) day rolling average period, of the pollutant NO_x, for internal combustion engines E7, E8, and E9, as specified in the attached NO_x RACT Plan - Amendment #2. (Regulation 6.42, section 4.3)
- ii. The owner or operator shall comply with the all requirements of the attached NO_x RACT Plan - Amendment #2.

b. TAC

See U2 Comment #7.

c. TAP (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination, consisting of a routine operation and preventive maintenance program, for formaldehyde emissions.

d. HAP

The owner or operator is not required to limit HAPs emissions, because the engines are existing RICEs on which construction or reconstruction commenced prior to December 12, 2002. (40 CFR 63 Subpart ZZZZ, §63.6590 (b)(3)) (See U2 Comment #6)

S2. Monitoring (Regulation 2.16, section 4.1.9.1)**a. NO_x**

The owner or operator shall monitor continuously, on a real time basis, the engine parameters listed in Element 7.A of the attached NO_x RACT Plan Amendment #2, to ensure proper maintenance and functioning at industry acceptable conditions.

b. TAC

See U2 Comment #2.

c. TAP

- i. The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.
- ii. The owner or operator shall perform the routine preventative maintenance every 8,600 hours of engine operation. The actual preventative maintenance period shall not exceed the routine preventative maintenance time period by more than ten percent (10%), since the last routine maintenance period.
- iii. The owner or operator shall inspect, as a minimum, the items listed in section S3.c.

d. **HAP**

There are no monitoring requirements for this item. (See U2 Comment #6)

S3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **NO_x**

See attached NO_x RACT Plan – Amendment #2.

b. **TAC**

The owner or operator shall maintain a copy of MSDS for each TAC containing material used at this plant. (See U2 Comment #2)

c. **TAP**

The owner or separator shall, at a minimum, inspect and record the results of the below listed items.

- i. The name of the person performing the maintenance and the date the maintenance is performed.
- ii. Engine identification, manufacturer and model.
- iii. Total hours of engine operation.
- iv. Hours of engine operation since last maintenance.
- v. Engine oil pressure.
- vi. Engine oil “in and out temperatures.”
- vii. Items monitored on a real time basis per Element 7.A of NO_x RACT Plan – Amendment #2.
- viii. Summary of additional activities performed.

d. **HAP**

There are no record keeping requirements for this equipment.

S4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. **NO_x**

- i. The owner or operator shall submit semiannual compliance, annual compliance certification, and emission inventory reports that include the information in this section and the information as required by the NO_x RACT Plan – Amendment #2. The compliance reports shall clearly identify any deviations from a permit requirement, and if no deviations occur in that report period, the owner or operator shall report a negative declaration. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See U2 Comment #5)
- ii. The annual emission inventory may count as the second semiannual compliance report so long as the annual emission inventory is received by District by the second semiannual compliance report due date, March 1, of each year. The owner or operator shall report semiannually the following.
 - 1) Emission Unit ID number and Emission point ID number
 - 2) The beginning and ending date of the reporting period
 - 3) Report any deviations from the permit requirements.

b. **TAC**

See U2 Comment #2.

c. **TAP**

There are no compliance reporting requirements for this equipment.

d. **HAP**

There are no compliance reporting requirements for this equipment.

U2 Comments

1. NO_x RACT Plan - Amendment #2 is attached to this permit and all requirements apply.
2. Since the company is a Title V source, the company is subject to STAR generic standard requirements.
3. The Lean Emission Combustion (LEC) technology modifications, completed prior to October 2002, consist of permanent modifications to the engines, including but not limited to the installation of a turbocharger, a scavenging air cooler, a high-energy ignition system, power cylinder head replacement, and modifications to fuel systems, air system piping, natural gas piping, intake silencer, exhaust silencer and exhaust stack to accommodate the larger volume of intake air and exhaust gases.
4. The three (3) Cooper-Bessemer engines, numbers #7, #8, and #9, were converted from model GMWA-6 engines to model GMWA-6C per construction permit 68-01-C.
5. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.
6. 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines does not require limits, because the engines are existing spark ignition, 2-stroke, lean burn, stationary RICE, on which reconstruction commenced prior to December 12, 2002, and therefore do not have to meet the requirements of the subpart and of subpart A of this part. No initial notification was required. [§63.6590(a)(1)(i) and §63.6590(b)(3)]
7. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.01, section 1.6.7)

Emission Unit U16: Four (4) VOC Storage Tanks**U16 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, & 3.3

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.01	General Provisions	1, 2, 3, & 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1, 2, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, 6 & 7
5.14	Hazardous Air Pollutants and source Categories	1 & 2

U16 Equipment				
Emission Point	Description	Applicable Regulation	VOC Potential To Emit (tn/yr)	Control ID
E17	One (1) ethylene glycol storage tank, capacity 4,000 gallons, split tank, one-half pure ethylene glycol and one-half mixed ethylene glycol (TK20, installed 1999)	7.12, 5.01, 5.02, 5.11, 5.14	0.00004	N/A
E18	One (1) mixed ethylene glycol overflow storage tank for RICE surge tanks, capacity 310 gallons, with submerged fill pipe (TK22, installed 1999)	7.12, 5.01, 5.02, 5.11, 5.14	0.000005	N/A
E19	One (1) mixed ethylene glycol maintenance storage tank, capacity 955 gallons (TK23, installed 2000)	7.12, 5.01, 5.02, 5.11, 5.14	0.000005	N/A
E20	One (1) pipeline distillate storage tank, capacity 4,400 gallons (TK15, installed 1996)	7.12, 5.01, 5.02, 5.11, 5.14	0.0282	N/A

U16 Control Devices: There are no control devices associated with unit U16.

U16 Specific Conditions**S1. Standards** (Regulation 2.16, section 4.1.1)**a. VOC** (Regulation 7.12, Section 3.3)

For E17, E19 and E20: the owner or operator shall not store VOCs in a storage vessel with an as stored vapor pressure of greater than or equal to one and one-half psia (1.5 psia). (Regulation 7.12, section 3.3)

b. TAC (Regulation 5.01, section 3)

The owner or operator shall not allow any TAC emissions to exceed environmentally acceptable levels, whether specifically established by modeling or derived from default de minimis levels provided by the District. The owner or operator shall not increase the TAC content in a raw material, or substitute any raw materials with additional TACs, for those identified in the initial permit application for this process or equipment, if such increase or substitution would result in an increase in the emission of any TAC above the de minimis levels, without prior notification to, and approval by, the District.

c. TAP (Regulation 5.11, section 6)

The owner or operator shall maintain emissions below the calculated ASL, unless modeling, or RACT is performed.

S2. Monitoring (Regulation 2.16, section 4.1.9.1)**a. VOC**

See Section S3.a.

b. TAC

See U16 Comment #1.

c. TAP

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure proper tank performance.

S3. Record Keeping (Regulation 2.16, section 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. VOC

- i. For E17, E19 and E20: the owner or operator of the storage vessel shall maintain records of the material stored in the storage vessel and if the contents of the storage vessels are changed a record shall be made of the contents, the new vapor pressure, and the date of the change in order to demonstrate compliance with the Specific Condition U16 S1.
- ii. The emissions from the source's storage tanks are very minor (combined total less than one ton per year) in comparison to the plant-wide emissions of criteria pollutants. Therefore, in lieu of recording annual throughputs, the owner or operator may elect to report the Potential To Emit quantities listed in the U16 Equipment table as the annual emissions for each piece of equipment.

b. TAC

- i. The owner or operator shall maintain records of each TAC contained in all materials used onsite.
- ii. If a change is made that the owner or operator has determined to be de minimis, then the owner or operator shall maintain onsite, records of calculations of the pound per hour (lb/hr), pound per year (lb/yr) and the pound per averaging period for each TAC emission from each piece of equipment to verify that the TACs are de minimis. (Regulation 5.01, section 3)

c. TAP

- i. The owner or operator shall keep records of when maintenance is performed, who performed the maintenance, and what the maintenance entailed.
- ii. The owner or operator shall monitor and maintain records of the product name contained in each storage tank during each calendar month and consecutive 12-month period to show compliance to the ASL from the standards. Throughput quantities used to determine the Potential To Emit quantities shown in the U16 Equipment table shall be used to calculate compliance to ASL.

S4. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall clearly identify all deviations from permit requirements in the semiannual reports. All reports shall be certified by a responsible official as defined in Regulation 2.16, section 2.36. If no deviations occur in that reporting period then the

owner or operator shall report a negative declaration for each of the following categories. The owner or operator shall report semiannually the following:

a. **VOC**

i. See Section S3.a.ii.

ii. For E17, E19 and E20:

- 1) Emission Unit ID number and Emission point ID number.
- 2) The beginning and ending date of the reporting period.
- 3) Identification of all periods during which a deviation occurred.
- 4) A description, including the magnitude, of the deviation.
- 5) Identification of materials stored during the deviation.
- 6) If known, the cause of the deviation.
- 7) A description of all corrective actions taken to abate the deviation.
- 8) Any variance from the permit allowed stored materials.

b. **TAC**

The owner or operator shall report to the District any TACs that exceed the de minimis emission standards.

c. **TAP**

The owner or operator shall report in the semi-annual compliance reports and the annual certification report, any exceedances of the ASL that occurred or a negative declaration that no exceedances of the ASL occurred, during the time period of the report.

U16 Comments

1. Since the company is a Title V source, the company is subject to STAR generic standard applications.
2. The report periods and due dates for the semiannual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.
3. Emission point E18, the mixed glycol tank for overflow for the RICEs, (TK22) is the only tank in this emission point group equipped with a submerged fill pipe.

Emission Unit U20: Standby Generator**U20 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.42	Reasonable Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, & 5
40 CFR 63 Subpart A	General Provisions	§63.1 through §63.16
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	§63.6590 (a)(1)(i) & §63.6590(b)(3)

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.01	General Provisions	1, 2, 3, & 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1, 2, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5, & 6

U20 Equipment			
Emission Point	Description	Applicable Regulation	Control ID
E21	One (1) Waukesha 800 bhp, natural gas fueled RICE, 4-stroke, model L36GL (VGF), (installed 11/97), vented out stack S21	6.42, 40 CFR 63 Subpart A, Subpart ZZZZ, 501, 5.02, 5.11	N/A

U20 Control Devices: The natural gas fired Waukesha 4-stroke, RICE powered standby generator is equipped with NO_x emission equipment that limit NO_x emissions to less than 2.6 g/bhp-hr, per manufacturer's guarantee, based on a thirty (30) day rolling average period. Exhaust gases are vented out stack S21.

U20 Specific Conditions**S1. Standards** (Regulation 2.16, section 4.1.1)**a. NO_x**

- i. The owner or operator shall not allow the emission of gases into the atmosphere that contain two and six-tenths grams per brake horsepower-hour (2.6 g/bhp-hr) or more, based on a thirty (30) day rolling average period, of the pollutant NO_x, for internal combustion engine E20 as specified in the attached NO_x RACT Plan - Amendment #2. (Regulation 6.42, section 4.3)
- ii. The owner or operator shall limit the operation of the standby generator to one thousand five hundred (1,500) hours in any twelve (12) consecutive month period. (See U20 Comment #5)
- ii. The owner or operator shall comply with the all requirements of the attached NO_x RACT Plan - Amendment #2.

b. TAC

See U20 Comment #7.

c. TAP (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination, consisting of a routine operation and preventive maintenance program, for formaldehyde emissions.

d. HAP

The owner or operator is not required to limit HAPs emissions, because the engine is an existing RICE on which construction or reconstruction commenced prior to December 12, 2002. (40 CFR 63 Subpart 63 ZZZZ, §63.6590 (b)(3)) (See U20 Comment 6)

S2. Monitoring (Regulation 2.16, section 4.1.9.1)**a. NO_x**

See Section S3.a.i.

b. TAC

See U20 Comment #2.

c. **TAP**

The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.

d. **HAP**

There are no monitoring requirements for this equipment. (See Comment U20 #6)

S3. **Record Keeping** (Regulation 2.16, section 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **NO_x**

The owner or operator shall comply with Section 7.C of NO_x RACT Plan – Amendment #2 attached to this permit, no later than the first working day after the end of the previous month.

b. **TAC**

The owner or operator shall maintain a copy of MSDS for each TAC containing material used at this plant. (See U20 Comment #2)

c. **TAP**

The owner or operator shall keep records of when maintenance is performed, who performed the maintenance, and what the maintenance entailed.

d. **HAP**

There are no record keeping requirements for this equipment.

S4. **Reporting** (Regulation 2.16, section 4.1.9.3)a. **NO_x**

i. The owner or operator shall submit semiannual compliance reports that include the information in U20 Specific Condition S3.a. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See U20 Comment #4)

- ii. The annual emission inventory may count as the second semiannual compliance report so long as the annual emission inventory is received by District by the second semiannual compliance report due date, March 1, of each year.
- iii. The owner operator shall clearly identify all deviations from permit requirements in the semiannual reports. If no deviations occur during the reporting period, the operator shall report a negative declaration for each of the following categories and include the information listed below.
 - 1) Emission Unit ID number and Emission point ID number
 - 2) The beginning and ending date of the reporting period
 - 3) The total hours of operation for the month and the yearly hours of operation.
 - 4) Report any deviations from the permit requirements.

b. **TAC**

See U20 Comment #2.

c. **TAP**

There are no compliance reporting requirements for this equipment.

d. **HAP**

There are no compliance reporting requirements for this equipment.

U20 Comments

1. NO_x RACT Plan -Amendment #2 is attached to this permit and all requirements apply.
2. Since the company is a Title V source, the company is subject to STAR generic standard applications.
3. The Waukesha 800 bhp, 4-stroke, natural gas fueled RICE has a manufacturer's guaranteed NO_x (expressed as NO₂) emission rate not to exceed 2.6 g/bhp-hr.
4. The report periods and due dates for the semiannual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements.
5. The company requested limit of one thousand five hundred (1,500) hours of operation per year for the standby generator, limits the NO_x emissions to less than 5 tn/yr.
6. 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines does not require limits, because the engine is an existing spark ignition, 4-stroke, lean burn, stationary RICE, on which construction commenced prior to December 12, 2002, and therefore does not have to meet the requirements of the subpart and of subpart A of this part. No initial notification was required. [§63.6590(a)(1)(i) and §63.6590(b)(3)]
7. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.01, section 1.6.7)

Emission Unit U21: Compressor turbine T-2**U21 Applicable Regulations:**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.42	Reasonable Available Control Technology Requirements for Major Volatile Organic Compound and Nitrogen Oxides Emitting Facilities	1, 2, 3, 4.3, & 5
40 CFR 60 Subpart A	General Provisions	§60.1 through §60.19
40 CFR 60 Subpart GG	Standards of Performance for Stationary Gas Turbines	§60.332, §60.333
40 CFR 63 Subpart A	General Provisions	§63.1 through §63.16
40 CFR 63 Subpart YYYY	National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines	§63.6145

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.01	General Conditions	1, 2, 3, & 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1, 2, 3, 4, & 5
5.11	Standards of Performance for Existing Sources Emitting Toxic Air Pollutants	1, 2, 3, 4, 5 & 6

U21 Equipment			
Emission Point	Description	Applicable Regulation	Control ID
E22	One (1) Solar brand 14,491 bhp, (10.8MW) natural gas fueled stationary turbine engine, model Mars 100-T-15000S, (installed 7/1/05), vented out stack S22	6.42, 40 CFR 60 Subpart A, Subpart GG, 40 CFR 63 Subpart A, Subpart YYYY, 5.01, 5.02, 5.11	N/A

U21 Control Devices:

The natural gas (only) fired stationary turbine manufactured by Solar is computer controlled and manually monitored to insure operation in SoLoNO_x mode which limits the emissions, when the turbine is operated at greater than 50 % capacity. Exhaust gases are vented out stack S22. The gas starter for the turbine T-2 is a pneumatic starter, utilizing compressed natural gas from the pipeline. Turbine T-2 is used to power a natural gas compressor.

U21 Specific Conditions**S1. Standards** (Regulation 2.16, section 4.1.1)**a. NO_x**

- i. The owner or operator shall not allow the emission of gases into the atmosphere that exceed thirty-seven and one-half parts per million by volume on a dry gas basis (37.5 ppmvd) corrected to 15 % O₂, based on a one hour average, for the pollutant NO_x, for stationary combustion turbine T-2, as specified in the attached NO_x RACT Plan - Amendment #2. (Regulation 6.42, section 4.3)
- ii. The owner or operator shall not allow the emissions of any gases into the atmosphere that exceed one hundred ninety-seven parts per million by volume on a dry gas basis (197 ppmvd), corrected to 15% O₂, based on a one hour average, for the pollutant NO_x. (40 CFR 60.332(a)(2))
- iii. The owner or operator shall comply with all the requirements of the attached NO_x RACT Plan - Amendment #2.

b. SO₂

The owner or operate shall not allow the combustion of any fuel in the stationary turbine that contains sulfur in excess of eight-tenths of a percent (0.8 %) by weight. (40 CFR 60.333(b))

c. TAC

See U21 Comment #12.

d. TAP (Regulation 5.11, section 6)

The owner or operator shall comply with the RACT determination, consisting of a routine operation and preventive maintenance program, for formaldehyde emissions.

e. HAPs

- i. The owner or operator shall furnish an Initial Notification as specified in §63.9 (b)(2)(i) through (v), including a statement that the new stationary turbine has no additional emission limitation requirements and explain the basis of the exclusion. (40 CFR 63 Subpart YYYYY, §63.6145) (See U21 Comment 7)

- ii. At such time as EPA removes the Stay of Standards for gas fired subcategories, all new requirements shall be complied with by the owner or operator. (40 CFR 63 Subpart YYYY, §63.6095(2)(d))

S2. **Monitoring** (Regulation 2.16, section 4.1.9.1)

a. **NO_x**

The owner or operator shall continuously monitor the appropriate parameters to determine whether the lean premix stationary turbine is operating in the SoLoNO_x mode. (40 CFR 60 Subpart GG §60.334 (f)(2))

b. **SO₂**

The owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u), by using the following method. (40 CFR 60 Subpart GG, §60.334 (h)(3)) (See U21 Comment #9)

- i. The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less. (40CFR 60 Subpart GG §60.334 (h)(3)(i))

c. **TAC**

See U21 Comment #2.

d. **TAP**

- i. The owner or operator shall have a written maintenance program. The owner or operator shall follow a routine operation and preventive maintenance program to ensure optimum engine performance.
- ii. The owner or operator shall perform the routine preventative maintenance every 4,000 hours of engine operation. The actual preventative maintenance period shall not exceed the routine preventative maintenance time period by more than twenty-five percent (25%), since the last routine maintenance period.
- iii. The owner or operator shall inspect, as a minimum, the items listed in section S3.d.

e. **HAP**

There are no monitoring requirements for this equipment. (See U21 Comment #7)

S3. Record Keeping (Regulation 2.16, section 4.1.9.2)

The owner or operator shall maintain the required records for a minimum of five (5) years and make the records readily available to the District upon request.

a. NO_x

- i. The owner or operator shall develop and keep on-site a parameter monitoring plan which explains the procedures used to document proper operation of the NO_x emissions controls. The plan shall include the parameter(s) monitored and the acceptable ranges(s) of the parameter(s) as well as the basis for designating the parameters(s) and acceptable range(s). (40 CFR 60 Subpart GG §60.334 g)
- ii. The owner or operator shall monitor the items listed in Element 7. B of the attached NO_x RACT Plan - Amendment #2, to ensure the proper functioning of compressor turbine T-2, which includes the below listed items.
 - 1) Annual stack tests shall be performed to ensure turbine emissions do not exceed the limits in section S1.
 - 2) The beginning and ending times and dates of the each period of time that compressor turbine T-2 is not operating in the SoLoNO_x mode.
 - 3) The beginning and ending times and dates of each startup and shutdown time period.
 - 4) Monthly and yearly fuel consumption quantities, to be used for determining NO_x, SO₂, HAP and total HAPs emissions.

b. SO₂

The owner or operator shall maintain documentation that the characteristics of the gaseous fuel combusted in the turbine meets the requirements of natural gas as defined in 40 CFR 60.331 (u). (See U21 Comment #9)

c. TAC

The owner or operator shall maintain a copy of MSDS for each TAC containing material used at this plant. (See U21 Comment #2)

d. TAP

The owner or operator shall, as a minimum, inspect and document the results of the below listed items.

- i. Date the maintenance is performed and the name of the person performing the maintenance.

- ii. Engine identification, manufacturer and model
- iii. Total hours of engine operation.
- iv. Hours of engine operation since last maintenance.
- v. Total engine hours.
- vi. Engine horsepower.
- vii. Items monitored on a real time basis per Element 7.B of NO_x RACT Plan – Amendment #2.
- viii. Summary of additional activities performed.

e. **HAP**

There are no record keeping requirements for this equipment.

S4. **Reporting** (Regulation 2.16, section 4.1.9.3)

a. **NO_x**

- i. The owner or operator shall submit semi-annual compliance, annual compliance certification and emission inventory reports that include the information required in this section, U21 Specific Condition S3.a and the NO_x RACT Plan – Amendment #2. The compliance reports shall clearly identify any deviations from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. (See U21 Comment #5)
- ii. The annual emission inventory may count as the second semi-annual compliance report so long as the annual emission inventory is received by District by the second semi-annual compliance report due date, March 1, of each year. If no deviations occur in that report period than the owner or operator shall report a negative declaration. The owner or operator shall report semi-annually the following.
 - 1) Emission Unit ID number and Emission point ID number
 - 2) The beginning and ending date of the reporting period
 - 3) Report any deviations from the permit requirements.
- iii. The owner or operator shall submit reports of excess emissions and monitor downtime, in accordance with §60.7(c), for each affected unit that elects to continuously monitor parameter or emissions. (40 CFR 60 Subpart GG §60.334(j))

b. **SO₂**

There are no reporting requirements for this pollutant. The owner or operator shall maintain documentation as required in section S2.b. (See U21 Comment #9)

c. **TAC**

See U21 Comment #2.

d. **TAP**

There are no compliance reporting requirements for this equipment.

e. **HAP**

There are no compliance reporting requirements for this equipment.

S5. **Testing** (Regulation 2.16, section 4.1.9.1.2)a. **NO_x**

The owner or operator shall comply with the all requirements of the attached NO_x RACT Plan - Amendment #2.

b. **CO**

The owner or operator shall test each year for the pollutant carbon monoxide (CO), using a Method 10 test. (See U21 Comment #11)

U21 Comments

1. NO_x RACT Plan - Amendment #2 is attached to this permit and all requirements apply.
2. Since the company is a Title V source, the company is subject to STAR generic standard applications.
3. The compressor turbine, T-2, was installed per construction permit 115-04-C.
4. The new Solar 14,491 hp natural gas fired compressor turbine, T-2, replaced the old natural gas fired decommissioned compressor turbine, T-1.
5. The report periods and due dates for the semi-annual reports required by this emission unit are as listed in General Condition #14, Monitoring and Related Record Keeping and Reporting Requirements
6. Stack tests shall be performed annually, to insure compliance to the standards, per NO_x RACT Plan – Amendment #2, in lieu of requirements for continuous emissions monitoring equipment on compressor turbine, T-2.

7. 40 CFR 63 Subpart YYYY §63.6095 (d) is a Stay of Standards for gas-fired subcategories. §63.6095 (d) specifies that if the owner or operator starts up a new or reconstructed stationary combustion turbine that is a lean premix gas-fired stationary combustion turbine or a diffusion flame gas-fired stationary turbine as defined by the subpart, they must comply with the Initial Notification requirements set forth in §63.6145, but need not comply with any other requirement of this subpart until EPA takes final action to require compliances and publishes a document in the *Federal Register*. The Initial Notification was received by the District on Oct. 12, 2005, stating that the new turbine was initially started on June 14, 2005, and placed into service July 1, 2005.
8. 40 CFR 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines is not applicable because construction commenced prior to February 18, 2005.
9. The average sulfur content of the four samples analyzed during 2003 for Hardinsburg was 0.00021% by weight sulfur, which is well below the standard of 0.8% by weight.
10. The potential emissions for this project are greater than 40 tons per year of NO_x, therefore the source was required to perform “netting” for PSD/Non-attainment NSR. The potential NO_x emissions for the new T-2 turbine are 54.6 tons per year. The source had two year actual contemporaneous NO_x emission reductions of 234 tons per year for the removal of the T-1 turbine in 2004, 693.4 tons per year for the engine retrofit project in 2002, and 157 tons per year for the power conversion project in 1997. Therefore, the installation of the new T-2 turbine will result in a net decrease in NO_x emissions of 1,029.8 tons per year. Therefore, the new installation has “netted out” of PSD/Nonattainment NSR for NO_x.
11. The Method 10 test is an applicable test method for determining concentrations of carbon monoxide (CO) emissions per 40 CFR 60 Appendix A. The use of the Method 10 test for carbon monoxide emissions was inadvertently omitted from section 9.A. of the attached NO_x RACT Plan - Amendment #2.
12. The TAC emissions from the combustion of natural gas are considered to be “de minimis emissions” by the District. This includes all of the emissions from a process or process equipment for which the only emissions are the products of combustion of natural gas, such as from a natural gas-fired boiler or turbine, but does not include the other emissions from a process or process equipment that are not the products of the combustion of natural gas. (Regulation 5.01, section 1.6.7)
13. The old compressor turbine engine, T-1, General Electric, model M3122R, 12,090 bhp, installed Nov. 1969, has been decommissioned and disconnected from the main pipeline. The associated Dollinger Corp. 6” diameter lube oil sump vent, model OE-158B-1000, installed Nov. 1993, has been removed from site. Both the turbine and the vent were emission Unit U13 in the original Title V permit.

Emission Unit U25: Two (2) cold solvent parts cleaners

U25 Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3 & 4

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.01	General Provisions	1, 2, 3, & 4
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants	1, 2, 3, 4, & 5

U25 Equipment			
Emission Point	Description	Applicable Regulation	Control ID
E26	One (1) Graymills, model PL36-A, nonhalogenated cold solvent parts cleaner, fifteen (15) gallon capacity reservoir	6.18	N/A
E27	One (1) custom made, nonhalogenated cold solvent parts cleaner, two hundred twenty-five (225) gallon capacity reservoir	6.18	N/A

U25 Control Devices: There are no control devices associated with Emission Unit 25.

U25 Specific Conditions

- S1. **Standards** (Regulation 2.16, section 4.1.1)
 - a. **VOC** (Regulation 6.18, sections 4.1, 4.2, 4.3.2)
 - i. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)

- 1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. (Regulation 6.18, section 4.1.1)
 - 2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. (Regulation 6.18, section 4.1.2)
 - 3) A permanent, conspicuous label summarizing the operating requirements specified in Specific Condition 1.b. shall be installed on or near the cold cleaner. (Regulation 6.18, section 4.1.3)
 - 4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. (Regulation 6.18, section 4.1.4)
 - 5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. (Regulation 6.18, section 4.1.6)
 - 6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. (Regulation 6.18, section 4.1.8)
- ii. The owner or operator shall observe at all times the following operating requirements: (Regulation 6.18, section 4.2)
- 1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (Regulation 6.18, section 4.2.1)
 - 2) The solvent level in the cold cleaner shall not exceed the fill line. (Regulation 6.18, section 4.2.2)

- 3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. (Regulation 6.18, section 4.2.3)
 - 4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. (Regulation 6.18, section 4.2.4)
 - 5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. (Regulation 6.18, section 4.2.5)
 - 6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. (Regulation 6.18, section 4.2.6)
 - 7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. (Regulation 6.18, section 4.2.7)
- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). (Regulation 6.18, section 4.3.2)

b. **TAC**

The owner or operator shall not allow any TAC emissions to exceed environmentally acceptable levels, whether specifically established by modeling or derived from default de minimis levels provided by the District. The owner or operator shall not increase the TAC content in a raw material, or substitute any raw materials with additional TACs, for those identified in the initial permit application for this process or equipment, if such increase or substitution would result in an increase in the emission of any TAC above the de minimis levels, without prior notification to, and approval by, the District. (Regulation 5.01, section 3)

S2. **Monitoring** (Regulation 2.16, section 4.1.9.1)

a. **VOC**

See U25 Specific Condition S3.a.

b. TAC

See U25 Specific Condition S3.b.

S3. Record Keeping**a. VOC**

i. The owner or operator shall maintain records that include the following for each purchase: (Regulation 6.18, section 4.4.2)

- 1) The name and address of the solvent supplier,
- 2) The date of the purchase,
- 3) The type of the solvent, and
- 4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).

ii. All records required in U25 Specific Condition 3.a. shall be retained for 5 years and made available to the District upon request. (Regulation 6.18, section 4.4.3)

iii. The owner or operator shall keep a record of the MSDS for the solvent.

b. TAC

i. The owner or operator shall maintain records of each TAC contained in all materials used onsite.

ii. If a change is made that the owner or operator has determined to be de minimis, then the owner or operator shall maintain onsite, records of calculations of the pound per hour (lb/hr), pound per year (lb/yr) and the pound per averaging period for each TAC emission from each piece of equipment to verify that the TACs are de minimis. (Regulation 5.01, section 3)

S4. Reporting**a. VOC**

There are no routine compliance reporting requirements for Regulation 6.18.

b. TAC

See U25 Comment #2.

U25 Comments

1. Cold solvent parts washers are not an insignificant activity per the definition of insignificant activities, Regulation 2.16, section 1.22.1.
2. Since the company is a Title V source, the company is subject to STAR generic standard requirements.

NO_x RACT Plan - Amendment 2

1. The oxides of nitrogen (NO_x, expressed as NO₂) emissions from each of Internal Combustion (IC) Engines #1 through #9 shall not exceed 3 grams per brake-horsepower-hour (g/bhp-hr), based on a thirty (30) day rolling average period.
2. Existing Lean Emission Combustion (LEC) equipment modifications, completed October 2002, per construction permit 68-01-C, to the nine (9) Reciprocating Internal Combustion Engines (RICE) shall remain in place, to ensure the 3g/bhp-hr limit of NO_x, based on a thirty (30) day rolling average period, is maintained.
3. The NO_x emissions (expressed as NO₂) for the new compressor turbine T-2 (emission point U21) shall not exceed thirty-seven and one-half parts per million by volume on a dry gas basis (37.5 ppmvd) corrected to 15% O₂, based on a one hour average. (Regulation 6.42)
4. No stationary gas turbine shall discharge any gases into the atmosphere which contain nitrogen oxides in excess of one hundred ninety-seven parts per million by volume on a dry gas basis (197 ppmvd) corrected to 15% O₂, based on a one hour average. (40 CFR 60.332 (a) (2))
5. No fuel shall be combusted in the stationary gas turbine that contains sulfur in excess of 0.8 % by weight. (40 CFR 60.333 (b))
6. The NO_x (expressed as NO₂) emissions from the Standby Generator Engine shall not exceed 2.6 grams per brake horsepower-hour, per manufacturer's guarantee, based on a thirty (30) day rolling average period, and generator usage shall not exceed 1,500 hr/yr.
7. Texas Gas shall monitor and record the following information:
 - A. For each IC engine after it is subject to the 3 g/bhp-hr NO_x emissions limit, the following parameters shall be monitored continuously on a real time basis, but no regular interval recording shall be required. Engines will continue to be properly maintained and operated based on monitored parameters.
 - (1) Engine speed,
 - (2) Engine load,
 - (3) Fuel gas flow,
 - (4) Air manifold temperature,
 - (5) Air manifold pressure, and
 - (6) Ignition timing, and
 - (7) Stack tests as required in Element No. 8, to confirm NO_x emissions less than 3 g/bhp-hr.
 - B. For Turbine T-2 (new) the following monitoring and recording plan, which shall be approved by the District, subject to EPA review and approval, and shall be incorporated into the Title V Operating Permit pursuant to the provisions of NO_x RACT Plan Element No. 11, shall be implemented:
 - (1) Periods of time when turbine T-2 is not operating in the SoLoNO_x mode, and startup and shutdown time periods, and

(2) Stack tests as required in Element No. 8, to confirm NO_x emissions less than 37.5 ppmvd, corrected to 15% O₂, when operating in SoLoNO_x mode.

C. For the Standby Generator Engine:

(1) The weekly hours of operation and the twelve (12) consecutive month period total hours of operation, shall be recorded each month, to show that the total hours of operation during the previous twelve consecutive (12) month period is less than 1,500 hrs.

Texas Gas shall record all periods when the required information in this Element was not available, the reason for the loss of data, and any corrective actions taken to resolve the problem. Each record shall be maintained for a minimum of 5 years and made available to the Air Pollution Control District (District) upon request.

8. Texas Gas shall conduct NO_x performance tests for the equipment identified in this Element according to the following schedule:
- A. Each year, two IC engines from the group of IC Engines #1 through #6. Testing of the engines shall be alternated such that each IC engine in this group has been tested in a three-year period,
 - B. Each year, one IC engine from the group of IC Engines #7 through #9. Testing of the engines shall be alternated such that each IC engine in this group has been tested in a three-year period, and
 - C. Each year, Turbine T-2.
9. Performance testing shall meet the following requirements:
- A. Emissions concentrations and the mass determinations shall be obtained using Reference Methods of 40 CFR Part 60 Appendix A. The following methods shall be used:
 - (1) Method 1 or 1A, which furnishes guidance in site and traverse selection for sampling velocity at traverse points in stationary sources,
 - (2) Method 2, 2A, 2B, 2C, 2D, 2E, 2F, 2G, or 2H, which applies to measurements of gas volumetric flow rates,
 - (3) Method 3, 3A, 3B, or 3C, which is applicable for determining the concentrations of one or more of the following gases: carbon dioxide (CO₂), oxygen (O₂), carbon monoxide (CO), nitrogen, and methane,
 - (4) Method 4, which determines the moisture content in stack gases, and
 - (5) Method 7, 7A, 7B, 7C, 7D, or 7E, which provides the analytical method for determining the concentration of NO_x emissions from stationary sources.
 - (6) Method 19, which is acceptable for determine the exhaust flow rate.
 - B. The use of other Reference Methods that are added to 40 CFR Part 60 Appendix A, alternative tests, or modifications to the Reference Methods listed in NO_x RACT Plan Element No. 9.A. may be proposed by Texas Gas as part of the testing plan required by Element No. 9.D. Such methods may be used if approved in writing by the Louisville Metro Air Pollution Control District (District).
 - C. Performance testing shall meet the requirements of Regulation 1.04 *Performance Tests* that are not addressed in this Element. All testing shall be conducted at 90% or greater of the maximum rated heat input capacity of the equipment.

- D. A notification of intent (protocol) to conduct a performance test shall be submitted to the District at least 25 working days in advance of the projected starting date for the performance test. The notification shall include the proposed test methods to be used.
 - E. If a pre-test conference to discuss the proposed test methods is deemed necessary by the District, a pre-test conference shall be arranged by District personnel.
 - F. At least 10 working days' prior notice of the scheduled starting date for the performance test shall be provided to the District.
 - G. A performance test report shall be submitted to the District within 60 days of completion of performance testing. The report shall include the calculations used to determine emissions. The NO_x emission rate for each RICE emissions unit for which performance testing is required in Element No. 8, shall be expressed in pounds per hour and grams per brake horsepower-hour. The NO_x emission rate for the Turbine T-2 shall be expressed in parts per million by volume on a dry gas basis, corrected to 15% O₂. The raw data shall be retained by Texas Gas for a minimum of 5 years and made available to the District upon request. Selected portions of the raw data used to calculate the emissions shall be included in the report in a format provided by the District.
10. Texas Gas shall keep a record identifying all deviations from the requirements of this NO_x RACT Plan and shall submit to the District a written report of all deviations that occurred during the preceding semi-annual period. Semi-annual periods shall run from January 1 to June 30 and July 1 to December 31. The report shall contain the following information:
- A. The equipment designation,
 - B. The beginning and ending date of the reporting period,
 - C. Identification of all periods during which a deviation occurred, including the loss of data as required by Element 7,
 - D. A description, including the magnitude, of the deviation,
 - E. If known, the cause of the deviation, and
 - F. A description of all corrective actions taken to abate the deviation.
- If no deviation occurred during the semi-annual period, the report shall contain a negative declaration. Each report shall be submitted within 60 days following the end of the semi-annual period.
11. In lieu of the requirements in this NO_x RACT Plan, Texas Gas may comply with alternative requirements regarding emission limitations, equipment operation, test methods, monitoring, record keeping, or reporting, provided the following conditions are met:
- A. The alternative requirements are established and incorporated into an operating permit pursuant to a Title V Operating Permit issuance, renewal, or significant permit revision process as established in Regulation 2.16,
 - B. The alternative requirements are consistent with the streamlining procedures and guidelines set forth in section II.A. of *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, March 5, 1996, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards. The overall effect of compliance with alternative requirements shall consider the effect on an intrinsic basis, such as grams per brake horsepower-hour,

- C. The U.S. Environmental Protection Agency (EPA) has not objected to the issuance, renewal, or revision of the Title V Operating Permit, and either
- D. If the public comment period preceded the EPA review period, then the District had transmitted any public comments concerning the alternative requirements to EPA with the proposed permit, or
- E. If the EPA and public comment periods ran concurrently, then the District had transmitted any public comments concerning the alternative requirements to EPA no later than 5 working days after the end of the public comment period.

The District's determination of approval of any alternative requirements is not binding on EPA. Noncompliance with any alternative requirement established pursuant to the Title V Operating Permit process constitutes a violation of this NO_x RACT Plan.

History: Approved 11-8-99; effective 1-1-00; amended a1/12-20-00; effective 01-01-01: a2/02-XX-09 effective 3-XX-09.

Note: For administrative reasons, the term "Emergency Generator" was changed to "Standby Generator" in sections #6 and #7.C of this NO_x RACT Plan – Amendment #2, during the issuing of the Title V permit.

Permit Shield

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all conditions of this permit. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance, pursuant to Regulation 2.16, section 4.6.1.

Off-Permit Documents

There are no off-permit documents associated with this Title V permit.

Alternative Operating Scenario

There is no Alternative Operating Scenario associated with this Title V permit.

Compliance Assurance Monitoring

Texas Gas Transmission, LLC is not subject to 40 CFR Part 64 - *Compliance Assurance Monitoring for Major Stationary Sources*, since each emission point has no supplementary control device for NO_x or CO emissions for which the company is a major source and each emission point is not capable of exceeding the standard for NO_x and CO.

Insignificant Activities

Equipment	Quantity	Pollutant Potential To Emit (tn/yr)	Basis for Exemption
Brazing, soldering or welding	Various	PM/PM ₁₀ 0.006	Regulation 2.02, sec. 2.3.4
Emergency relief vents	Various	Note #8	Regulation 2.02, sec. 2.3.10
Lubricate oil storage tank (TK01, 11,750 gal, installed 1950)	1	VOC 0.00002	Regulation 2.02, sec. 2.3.9.2
Mixed lubricate oil/water storage tank (TK02, 6,000 gal, installed 1969)	1	VOC 0.000015	Regulation 2.02, sec. 2.3.9.2
Mixed lubricate oil/water storage tank (TK05, 2,727 gal, installed 1969)	1	VOC 0.000005	Regulation 2.02, sec. 2.3.9.2

Equipment	Quantity	Pollutant Potential To Emit (tn/yr)	Basis for Exemption
Diesel fuel storage tank (TK06, 300 gal, installed 1974)	1	VOC 0.00009	Regulation 2.02, sec. 2.3.9.2
Diesel fuel storage tank (TK07, 300 gal, installed 1974)	1	VOC 0.00009	Regulation 2.02, sec. 2.3.9.2
Gasoline storage tank < 250 gal (TK09, 220 gal, installed 1979)	1	VOC 0.1454	Regulation 2.02, sec. 2.3.24
Portable pipeline fluid storage tank < 250 gal (TK11, 165 gal, installed date unkown)	1	VOC 0.0023	Regulation 2.02, sec. 2.3.24
Waste lubricate oil storage tank (TK12, 575 gal, installed date unkown)	1	VOC 0.000005	Regulation 2.02, sec. 2.3.9.2
Lubricate oil recovery tank (TK14, 1,615 gal, installed 1953)	1	VOC 0.000005	Regulation 2.02, sec. 2.3.9.2
Mixed lubricate oil/water storage tank (TK16, 6,000 gal, installed 1998)	1	VOC 0.000015	Regulation 2.02, sec. 2.3.9.2
Mixed lubricate oil/water storage tank < 250 gal, with submerged fill pipe (TK21, 135 gal, installed 1999)	1	VOC 0.000005	Regulation 2.02, sec. 2.3.24
Diesel fuel storage tank (TK24, 50 gal, installed 2009)	1	VOC 0.000035	Regulation 2.02, sec 2.3.9.2
Combustion sources < 1 mmbtu/hr Heaters for offices, break rooms and warehouse, etc.	20	CO 1.84 NO _x 2.52	Regulation 2.02, sec. 2.1.1
Internal combustion engines	Various	Note #9	Regulation 2.02, sec 2.2

- Notes:
- TK21, the mixed lubricate oil/water storage tank is the only tank in the insignificant list group of tanks that has a submerged fill pipe.
 - Portable pipeline fluid storage tank, TK08 (previously emission point U17), with a 560 gallon capacity, has been retired.
 - Portable station maintenance tank, TK10 (previously emission point U18), with a 430 gallon capacity, has been retired.
 - Diesel fuel tank, TK19, with a 150 gallon capacity, has been retired.

- 1) Insignificant Activities identified in District Regulation 2.02, section 2, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 2.02, section 2, shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4
- 3) The District has determined pursuant to Regulation 2.16, section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed.
- 4) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 5) The company shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16, section 4.3.5.3.6.
- 6) For the vessels that store materials with a vapor pressure less than 1.5 psia (Ethylene Glycol, diesel fuel, natural gas distillates, etc) or any other tank that stores VOCs or HAPs, the owner or operator shall maintain records of the materials stored in the tanks. The company shall monitor and record the throughput (in gallons) of each product for each tank, and report the annual emissions to the District in accordance with Regulation 1.06.
- 7) In lieu of recording annual throughputs, the owner or operator may elect to report the Pollutant Potential To Emit quantity listed in the Insignificant Activities table, as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.
- 8) Emission from emergency relief valve releases shall be treated as an Upset Condition and notification of the condition and the resulting emissions shall be reported to District as required by Regulation 1.07 and in the annual emissions inventory.
- 9) Annual emissions from the Emergency Fire Pump engine and the Auxiliary Air Compressor engine shall be calculated using the annual hours of operation from the annual hours of operations recorded for each engine.