



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 21 2016

REPLY TO THE ATTENTION OF

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hall:

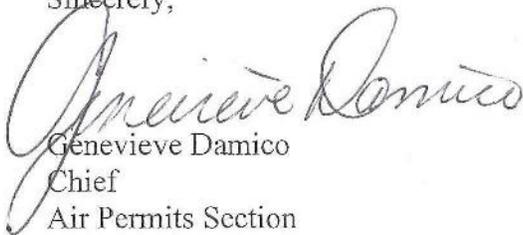
The U.S. Environmental Protection Agency has reviewed the draft Permit to Install (PTI), permit number P0120361, for Texas Eastern Transmission - Compressor Station, located in Lebanon, Ohio. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

1. There are several permit conditions for emission unit P006 - Gas Turbine 12301 that generally reference the 40 CFR Part 60 Subpart KKKK New Source Performance Standard (NSPS) for Stationary Combustion Turbines by saying that the gas turbine is subject to the "applicable" operational, monitoring and recordkeeping, reporting, and testing requirements of 40 CFR 60.4300 – 60.4420 (NSPS subpart KKKK). The following permit conditions for the gas turbine all have this general reference language: (1) permit condition B.1.c.3, Operational Restrictions on page 16, (2) permit condition B.1.d.3, Monitoring and/or Recordkeeping Requirements on page 17, (3) permit condition B.1.e.4, Reporting Requirements on page 18, and (4) permit condition B.1.f.2, Testing Requirements on page 19. The specific operational, monitoring and recordkeeping, reporting, and testing NSPS Subpart KKKK requirements that apply to the gas turbine should be listed in the permit as enforceable permit requirements. For example, 40 CFR 4400 – 4415 describes the different options for initial and subsequent testing using EPA Methods 7E or 20, and that subsequent tests are to be done on an annual basis. Please add the specific NSPS Subpart KKKK requirements that are applicable to the turbine to the permit.
2. It is unclear whether this permit is a major or minor source permit because there is contradictory information on the permit's cover page and the Permit Strategy Write-Up. The table on the permit cover page indicates that the permit is neither a Prevention of Significant Deterioration major source nor a netting permit, but items 1 and 3 in the Permit Strategy Write-Up contradict that by indicating: both a synthetic minor

determination and a netting determination has been made for this source (item 1), and that "the facility is a major source of combustion emissions." (item 3). The ton per year emissions shown in the table in item 7 of the Permit Strategy Write-Up indicates the source as being a minor source, but please clarify the status of the source/permit. If it is major, the permit would need to go through major New Source Review, if the source is synthetic minor, restrictions would need to be added to the permit, and if it is a netting permit, the draft permit would need to contain the netting analysis.

We appreciate the opportunity to provide comments on this permit and look forward to discussing them with you. If you have any questions, please feel free to contact Richard Angelbeck, of my staff, at (312) 886-9698.

Sincerely,



Genevieve Damico
Chief
Air Permits Section