John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

1/21/2014

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Reagan Mayces
TEXAS EASTERN TRANSMISSION L.P.
EHS - US Operations
PO Box 1642
Houston, TX 77251-1642

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0165000113
Permit Number: P0115842
Permit Type: OAC Chapter 3745-31 Modification
County: Pickaway

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-CDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
TEXAS EASTERN TRANSMISSION L.P.

Facility ID:	0165000113
Permit Number:	P0115842
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	1/21/2014
Effective:	1/21/2014
Expiration:	1/21/2024

Division of Air Pollution Control
Permit-to-Install and Operate
for
TEXAS EASTERN TRANSMISSION L.P.

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Authorization

Facility ID:	0165000113
Application Number(s):	A0049321
Permit Number:	P0115842
Permit Description:	Chapter 31 modification permit reflecting the installation of a new gas operated valve actuator and associated valves and lines at the Five Points Compressor Station as part of the backflow prevention project.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$600.00
Issue Date:	1/21/2014
Effective Date:	1/21/2014
Expiration Date:	1/21/2024

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

TEXAS EASTERN TRANSMISSION L.P.
19909 FIVE POINTS PIKE
WILLIAMSPORT, OH 43164

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director

Authorization (continued)

Permit Number: P0115842
Permit Description: Chapter 31 modification permit reflecting the installation of a new gas operated valve actuator and associated valves and lines at the Five Points Compressor Station as part of the backflow prevention project.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**J001**
Company Equipment ID:	Liquids loading
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P001**
Company Equipment ID:	Gas Releases
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P801**
Company Equipment ID:	P801
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T001**
Company Equipment ID:	Liquids storage tank
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. “Shut down” means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. J001, Liquids loading

Operations, Property and/or Equipment Description:

pipeline liquids loading

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3), as effective 11/20/01	Volatile Organic Compound (VOC) emissions shall not exceed 0.0025 ton per month averaged over a 12-month rolling period. See b)(2)a
b.	OAC Rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule

revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/yr.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record the throughput of the produced water/condensate truck loading process, in gallons per year.

(2) The permittee shall maintain records of the data used to calculate tank truck loading losses used to determine compliance with the VOC emissions limitation pursuant to f)(1)(a).

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 0.0025 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation averaged over a 12-month rolling period shall be determined based upon the following calculations:

Loading losses from tank truck loading shall be calculated by multiplying the total petroleum liquid throughput for the 12-month period recorded pursuant to d)(1) by the loading loss emissions factor of 2.34 lbs VOC/1,000 gallons of liquid loaded (L_L) and one year/12 months.

The loading loss emissions factor is based upon AP-42, Section 5.2, Equation 1 (6/08) and the following inputs from the permittee's application:

L_L = 12.46 SPM/T

Where:

L_L = loading loss emissions factor, in pounds per 1,000 gallons loaded

S = saturation factor, 0.6 for submerged fill

P = true vapor pressure of liquid loaded of 3.31 psi

M = molecular weight of vapor of 50 lb/lb-mol

T = temperature of bulk liquid of 527.22 ^{o}R

g) Miscellaneous Requirements

(1) None.

2. P001, Gas Releases

Operations, Property and/or Equipment Description:

Natural gas releases

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile Organic Compound (VOC) emissions shall not exceed 3.08 tons per month, average over a 12-month period.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record

a. Number of maintenance releases;

b. Volume of gas released per maintenance event; and

c. VOC emissions rate for each release, as calculated per section f)(1)a.

(2) The records associated with the gas release maintenance program shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 3.08 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation averaged over a 12-month rolling period shall be demonstrated based the VOC emissions from each maintenance release, calculated as follows:

$$\text{VOC (tons/month)} = \sum_{i=1}^{n} \text{lb VOC/release} \times 8{,}760 \text{ hours/year} \times 1 \text{ ton}/2{,}000 \text{ pounds} \times 1 \text{ year}/12 \text{ months}$$

Where:

n = number of maintenance releases; and
lb VOC/release = VOC emissions rate for each release, as calculated below:

Volume of gas released per maintenance event X (% of each VOC in gas released X molecular weight of each VOC in gas released)

g) Miscellaneous Requirements

(1) None.

3. P801, P801

Operations, Property and/or Equipment Description:

Equipment leaks of various equipment components, including valves, pumps, flanges, and connectors will be located throughout the compressor station that may result in fugitive emissions due to equipment leaks.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3), as effective 11/20/01	Volatile Organic Compound (VOC) emissions shall not exceed 0.416 ton per month averaged over a 12-month rolling period. See b)(2)a
b.	OAC Rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that

BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/yr.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Leak Detection and Repair Program

a. The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment and compressors covered by this permit. This leak detection and repair program shall include the following elements:

i. An initial and then annual inspection of the ancillary and associated equipment and compressors shall be conducted to determine if a leak exists. Leaks shall be determined through the use of an analyzer meeting U.S. EPA Method 21, 40 CFR Part 60, Appendix A.

ii. The analyzer shall be operated and maintained following the instrument manufacturer's operation and maintenance instructions.

iii. A leak shall be determined if the instrument reading is equal to or greater than 10,000 ppm total VOC or the "leak detected" instrument reading required per any applicable rule.

iv. Documentation that includes the following:

(a) The date the inspection was conducted;

(b) The name of the employee conducting the leak check;

(c) The identification of any component that was determined to be leaking; and

(d) The date the component was repaired and determined to no longer be leaking.

b. The records associated with the leak detection and repair program shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 0.416 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation averaged over a 12-month rolling period shall be demonstrated based on the VOC emissions factors from U.S. EPA's "Protocol for Equipment Leak Emission Estimates", Table 2-4, for Oil and Gas production Operations (11/95) and the maximum number of each type of component at the facility in each type of service (gas/vapor, light oil and water/oil), calculated as follows, plus the VOC emissions from blowdowns of the pig receiver, calculated as follows:

<u>Fugitive Leaks:</u>

$$\text{VOC (tons/month)} = \sum_{i=1}^{n} \text{lb VOC/hr} \times 8{,}760 \text{ hours/year} \times 1 \text{ ton}/2{,}000 \text{ pounds} \times 1 \text{ year}/12 \text{ months}$$

Where:

n = number of each type of component in each type of service; and
lb VOC/hour = VOC emissions rate for each type of component in each type of service, as calculated below:

*Gas/Vapor Service**

Number of connectors X 4.41E-04 lb/hr/source X 17% VOC = lb VOC/hr

Number of valves X 9.92E-03 lb/hr/source X 17% VOC = lb VOC/hr

Number of pump seals X 5.29E-03 lb/hr/source X 17% VOC = lb VOC/hr

Number of flanges X 8.60E-4 lb/hr/source X 17% VOC = lb VOC/hr

Number of open ended lines X 4.41E-04 lb/hr/source X 17% VOC = lb VOC/hr

Number of others** X 1.94E-02 lb/hr/source X 17% VOC = lb VOC/hr

Light Oil Service

Number of connectors X 4.63E-04 lb/hr/source X 100% VOC = lb VOC/hr

Number of valves X 5.51E-03 lb/hr/source X 100% VOC = lb VOC/hr

Number of pump seals X 2.87E-02 lb/hr/source X 100% VOC = lb VOC/hr

Number of flanges X 2.43E-04 lb/hr/source X 100% VOC = lb VOC/hr

Number of open ended lines X 3.09E-03 lb/hr/source X 100% VOC = lb VOC/hr

Number of others** X 1.65E-02 lb/hr/source X 100% VOC = lb VOC/hr

Water/Oil Service

Number of connectors X 2.43E-04 lb/hr/source X 100% VOC = lb VOC/hr

Number of valves X 2.16E-04 lb/hr/source X 100% VOC = lb VOC/hr

Number of pump seals X 5.29E-05 lb/hr/source X 100% VOC = lb VOC/hr

Number of flanges X 6.39E-06 lb/hr/source X 100% VOC = lb VOC/hr

Number of open ended lines X 5.51E-04 lb/hr/source X 100% VOC = lb VOC/hr

Number of others** X 3.09E-02 lb/hr/source X 100% VOC = lb VOC/hr

*% VOC for gas/vapor service was based on the highest percent VOC in gas analyses pursuant to the permittee's application.

**includes compressors, drains/vents, pressure safety valves and sample points

<u>Pig Receiver Blowdowns:</u>

$$\text{VOC (tons/month)} = \sum_{i=1}^{n} \text{lb VOC/blowdown X 8,760 hours/year X 1 ton/2,000 pounds X 1 year/12 months}$$

Where:

n = number of pig receiver blowdowns; and
lb VOC/blowdown = VOC emissions rate for each blowdown, as calculated below:

Volume of gas released per blowdown X (% of each VOC in gas released X molecular weight of each VOC in gas released)

g) Miscellaneous Requirements

(1) None.

4. T001, Liquids storage tank

Operations, Property and/or Equipment Description:

pipeline liquids storage tank

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3), as effective 11/20/01	Volatile Organic Compound (VOC) emissions shall not exceed 0.132 ton per month averaged over a 12-month rolling period. See b)(2)a
b.	OAC Rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(L)(2)(a)	See b)(2)c. below.
d.	40 CFR Part 60, Subpart Kb (40 CFR 60.110b-60.117b)	See b)(2)d. below.
e.	40 CFR Part 60, Supbart OOOO (40 CFR 60.5360-60.5430)	See b)(2)e. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as

effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons/yr.

c. Pursuant to OAC rule 3745-21-09(L)(2)(a), this emissions unit is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank is a fixed roof tank with a capacity less than 40,000 gallons.

d. Pursuant to 40 CFR 60.110b(a), this emission unit is not an affected facility because the tank, installed after July 23, 1984, does not have a capacity greater than or equal to 75 m^3 (19,813 gallons).

e. Pursuant to 40 CFR 60.5365(e), single storage vessels located in the natural gas transmission and storage segment that have the potential for VOC emissions equal to or greater than six tons per year are affected facilities subject to 40 CFR Part 60, Subpart OOOO. Potential VOC emissions from the storage tank are less than six tons per year; therefore, this emissions unit is not an affected facility subject to 40 CFR Part 60, Subpart OOOO.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record the throughput of the produced water/condensate storage, in gallons per year.

(2) The permittee shall keep records of U.S. EPA TANKS software program and/or other process simulation program calculations used to determine compliance with the VOC emissions limitation pursuant to f)(1)a.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA, Central District Office by the due date identified in the Authorization section of this

permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

(1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 0.132 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the monthly VOC emissions limitation averaged over a 12-month rolling period shall be determined based upon the following calculations:

Breathing losses and working losses from the storage tank shall be calculated based upon the total petroleum liquid throughput for the 12-month period recorded pursuant to d)(1) using a current version of the U.S. EPA's TANKS software program, multiplied by one year/12 months.

Flash losses from the storage tank shall be calculated based upon the total petroleum liquid throughput for the 12-month period recorded pursuant to d)(1) using either the TANKS software program or other process simulation programs such as, but not limited to, HYSYS or ProMax, multiplied by one year/12 months.

g) Miscellaneous Requirements

(1) None.