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

2/24/2014

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mrs. Kristin Ikard
Scio Compressor Station
PO BOX 54342
Oklahoma City, OK 73154

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0634005056
Permit Number: P0115003
Permit Type: Initial Installation
County: Harrison

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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.

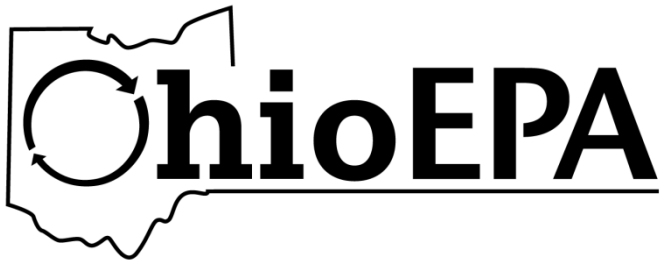
If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Ohio EPA-SEDO; Pennsylvania; West Virginia



FINAL

Division of Air Pollution Control
Permit-to-Install
for
Scio Compressor Station

Facility ID:	0634005056
Permit Number:	P0115003
Permit Type:	Initial Installation
Issued:	2/24/2014
Effective:	2/24/2014

Division of Air Pollution Control
Permit-to-Install
for
Scio Compressor Station

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Authorization

Facility ID:	0634005056
Facility Description:	320 MMscfd Natural Gas Production and Compression Facility
Application Number(s):	A0047966, A0048395, A0049826, A0049916
Permit Number:	P0115003
Permit Description:	Initial installation permit for Scio natural gas compressor station including storage tanks, loading rack, fugitive leaks, pigging, blowdown emissions, flaring emissions, roadways, compressor engines and generators.
Permit Type:	Initial Installation
Permit Fee:	$4,550.00
Issue Date:	2/24/2014
Effective Date:	2/24/2014

This document constitutes issuance to:

Scio Compressor Station
37650 Bower Rd
Scio, OH 43988

of a Permit-to-Install 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, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director

Authorization (continued)

Permit Number: P0115003
Permit Description: Initial installation permit for Scio natural gas compressor station including storage tanks, loading rack, fugitive leaks, pigging, blowdown emissions, flaring emissions, roadways, compressor engines and generators.

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

Emissions Unit ID: **F001**
Company Equipment ID: F001
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **J001**
Company Equipment ID: J001
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P014**
Company Equipment ID: P014
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P015**
Company Equipment ID: P015
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P016**
Company Equipment ID: P016
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P017**
Company Equipment ID: P017
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: **P023**
Company Equipment ID: P023
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: T001
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: Generators

Emissions Unit ID:	**P011**

Company Equipment ID:	P011
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	P012
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	P013
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: NG compressor engines

Emissions Unit ID:	**P001**
Company Equipment ID:	P001
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	P002
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	P003
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	P004
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	P005
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	P006
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	P007
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	P008
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	P009
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	P010
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theOhio EPA DAPC, Southeast District Officein accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be obtained beforeoperating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

1. The dehydration units controlled by emissions units P015 and P016 located at this facility are subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants (NESHAP) From Oil and Natural Gas Production Facilities: P015 and P016. The dehydration units at this facility are exempt per 63.764(e)(ii) from the requirements of 63.764(d)(2) due to the actual average emission of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year, as determined by the procedures specified in 63.772(b)(2) of 40 CFR Part 63, Subpart HH.

2. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Southeast District Office.

3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR 63, Subpart ZZZZ. Although Ohio EPA has determined that an area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

4. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: P001 – P010, and P011-P013. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoacess.gov or by contacting the Ohio EPA Southeast District Office.

5. The reciprocating compressors, storage vessels (T001), and pneumatic controllers (as defined in 60.5365 and 60.5430) located at this facility are subject to 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Southeast District Office.

6. Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary for this project because the combined emissions units’ (taking into account Ohio EPA’s Engineering Guide 69) maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

7. Air contaminant sources that qualify as de minimis under OAC rule 3745-15-05, or are exempt under OAC rule 3745-31-03(A)(1) or (4) are not subject to emission standards established within this permit. Although this permit does not apply to de minimis or exempt sources, emissions from de minimis or exempt sources must be included in the total potential to emit (PTE) calculations for this permit.

C. Emissions Unit Terms and Conditions

1. F001, Unpaved roadways and parking areas

Operations, Property and/or Equipment Description:

Unpaved Roadways and parking areas with a maximum of 16,425 VMT/yr.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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) and ORC 3704.03(T)	There shall be no visible particulate emissions (PE) from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period. See b)(2)a. below.

(2) Additional Terms and Conditions

a. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emissions limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emissions limitation of no VEs except for one minute during any 60-minute period.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

unpaved roadways and parking areas	minimum inspection frequency
Equipment pad gravel access drive	daily
Gravel site/equipment pad	daily

(2) The purpose of the inspections is to determine compliance with the above-mentioned emissions limitation. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement control measures to achieve compliance with the above-identified compliance method;

c. the type of control measures that were implemented;

d. the dates the control measures were implemented; and

e. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in Term d)(3)e. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

(3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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:

There shall be no visible PE fromunpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

(1) None.

2. J001, condensate and produced water truck loading

Operations, Property and/or Equipment Description:

Condensate (maximum annual throughput of 7,665,000 gallons) and produced water (maximum annual throughput of 1,533,000 gallons) truck loading including one loading rack for condensate and produced water. All loading of trucks equipped with submerged fill and vented to standard flare (P014) with a capture efficiency of 70% and a control/destruction efficiency of 98% for VOC emissions.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 11/30/01	Install a flare and capture system with a design capture efficiency of at least 70% and a design control efficiency of at least 98% for volatile organic compound (VOC) emissions. See b)(2)a.
b.	OAC rule 3745-31-05(C), 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 OAC rule 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 Standard (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 these emissions 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.

PTI P0115003 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements for VOC under OAC rule 3745-31-05(A)(3):

i. VOC emissions from the loading of trucks with condensate or produced water shall be vented to a flare with a minimum of 70% capture efficiency and 98% control efficiency;

ii. Use of submerged or bottom fill on all trucks; and

iii. Fugitive VOC emissions from condensate and produced water truck loading losses not captured and vented to the flare and VOC emissions captured and vented to the flare combined shall not exceed 7.78tons per year.

c) Operational Restrictions

(1) The permittee shall install and operate a flare for the control of VOC emissions whenever this emissions unit is in operation and shall maintain the flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) Emissions from the loading of trucks with condensate or produced water shall be vented to a flare with a minimum of 70% capture efficiency and 98% control efficiency for VOC. The flare shall be designed and operated as required in emissions unit P014.

(4) All condensate and produced water loading lines shall be equipped with fittings which are vapor tight.

(5) The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.

(6) The permittee shall not permit condensate or produced water to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct periodic inspections of the flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the flare and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the flare and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall maintain records that document any time periods when the flare was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the flare was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) The permittee shall collect and record the following each month:

a. the amount of throughput of condensate, in gallons;

b. the amount of throughput of produced water, in gallons; and

c. the monthly VOC emissions as calculated in section f)(1)a., in tons.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Design Efficiency Standard:

Install a flare and capture system with a design capture efficiency of at least 70% and a design control efficiency of at least 98% for VOC emissions.

Applicable Compliance Method:

Compliance is demonstrated by the manufacturer's design efficiency of adesign capture efficiency of at least 70% and a design control efficiency of at least 98% for VOC emissions.

b. Emissions Limitation:

PTI P0115003 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements for VOC under OAC rule 3745-31-05(A)(3):

i. VOC emissions from the loading of trucks with condensate or produced water shall be vented to a flare with a minimum of 70% capture efficiency and 98% control efficiency;

ii. Use of submerged or bottom fill on all trucks; and

iii. Fugitive VOC emissions from condensate and produced water truck loading losses not captured and vented to the flare and VOC emissions captured and vented to the flare combined shall not exceed 7.78tons per year.

Applicable Compliance Method:

The voluntary annual emissions limitation restriction was determined based on the following calculation:

Condensate truck loading loss:
Truck loading emissions shall be based on multiplying a loading loss factor by the annual liquid throughput in gallons per year divided by 1,000.

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation." The loading loss shall be determined by the following calculation:

Condensate loading loss = 12.46 SPM/T

Condensate loading loss =12.46 X 0.6 X 7.37 psia X 60 lb/lb mole/ 514.3^{o}R

=6.4279lbs/1,000 gal of liquid loaded

Annual emissions rate = condensate loading lossX condensate

Throughput =6.4279lb/1,000gal X 7,665 gal*= 49,269.8535lbs/yr.

49,269.8535 lbs/yr divided by 2,000 lbs = 24.6349 tons/year

(24.6349 tons/year)(1-0.70) = 7.3905 tons of VOC/year (fugitive)

(24.6349 tons/year)(0.70)(1-0.98) = 0.34489 tons of VOC/year from flare stack

Total VOC emissions from condensate loading:

0.34489 ton/year + 7.3905 tons/year = 7.73539 tons of VOC/year

Where:

S = saturation factor, 0.6 for submerged loading (AP-42 Chapter 5.2-1)

P = vapor pressure of liquid loaded *

M = molecular weight of vapor *

T = temperature of bulk liquid *

0.70 = capture efficiency of system in decimal form*

0.98 = destruction/control efficiency of flare in decimal form*

* frompermittee's application

Produced water truck loading:

Truck loading emissions shall be based on multiplying a loading loss factor by the annual liquid throughput in gallons per year divided by 1,000.

The loading loss factor was derived using AP-42, Section 5.2, "Loading Loss Equation." The loading loss shall be determined by the following calculation:

Produced water loading loss = 12.46 SPM/T

Produced water loading loss =12.46 X 0.6 X 0.36 psia X 37.0614 lb/lb mole/ 514.3^{o}R

=0.19394lbs/1,000 gal of liquid loaded

Annual emissions rate = condensate loading lossX condensate

Throughput =0.19394lb/1,000gal X 1,533 gal*= 297.31002lbs/yr.

297.31002 lbs/yr divided by 2,000 lbs = 0.1486550 tons/year

(0.14865501 tons/year)(1-0.70) = 0.044596503 tons of VOC/year (fugitive)

(0.148655 tons/year)(0.70)(1-0.98) = 0.00208117 tons of VOC/year from flare stack

Total VOC emissions from produced water loading:

0.044596503 ton/year + 0.00208117 tons/year = 0.046677673 tons of VOC/year

Where:

S = saturation factor, 0.60 for submerged loading (AP-42 Chapter 5.2-1)

P = vapor pressure of liquid loaded *

M = molecular weight of vapor *

T = temperature of bulk liquid *

0.70 = capture efficiency of system in decimal form*

0.98 = destruction/control efficiency of flare in decimal form*

* From permittee's application

Total Truck loading loss:

Truck loading loss = Condensate loading + produced water loading

= 7.73539 tons/yr + 0.046677673 ton/yr = 7.78 tons/yr

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group – 1,775 HP (13.40 MMBtu/hr) NG Compressors :P001,P002,P003,P004,P005,P006,P007,P008,

EU ID	Operations, Property and/or Equipment Description
P001	Compressor Engine #1 – 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO & VOC emissions.
P002	Compressor Engine #2 – 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO & VOC emissions.
P003	Compressor Engine #3 – 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO & VOC emissions.
P004	Compressor Engine #4 – 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO & VOC emissions.
P005	Compressor Engine #5 – 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO & VOC emissions.
P006	Compressor Engine #6 – 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO & VOC emissions.
P007	Compressor Engine #7 – 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO & VOC emissions.
P008	Compressor Engine #8 – 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO& VOC emissions.
P009	Compressor Engine #9– 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO& VOC emissions
P010	Compressor Engine #10– 1,775 HP Caterpillar G3606 (4S-LB) - natural gas-fired four-cycle lean burn internal combustion engine equipped with an oxidation catalyst controlling CO& VOC emissions

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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 11/30/01	Install an engine that is designed to meet the following: 0.50 g/hp-hr of nitrogen oxide (NO_X) emissions; 0.30 g/hp-hr of carbon monoxide (CO) emissions; and 0.14 g/hp-hr of volatile organic compounds (VOC) emissions. Particulate emissions (PE) shall not exceed 0.05 ton per month averaged over a twelve-month, rolling period. See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c. below.
d.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 pound/million Btu of actual heat input.
f.	40 CFR Part 60, Subpart JJJJ (40 CFR 60. 4230 – 60.4248) [In accordance with 40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1, this emissions unit is a 1,775hp, natural gas-fired, stationary spark internal combustion engine manufactured afterJuly 1, 2010 that islocated at a new natural gas compressor station and is subject to the emission limitations and controlmeasures specified in this section.]	NOx emissions shall not exceed 1.00 g/hp-hr or 82ppmvd at 15% oxygen (O_2). CO emissions shall not exceed 2.00 g/hp-hr or 270 ppmvd at 15% O_2. VOC emissions shall not exceed 0.7 g/hp-hror 60ppmvd at 15% O_2. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1]
g.	40 CFR Part 60.1 – 19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Subpart JJJJ shows which part of the General Provisions in 40 CFR Part 60.1 – 19 apply.
h.	40 CFR Part 60, Subpart OOOO (60.5360-60.5430) [In accordance with 40 CFR 63.5365(c), this emissions unit is a reciprocating compressor subject to the Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution.]	The reciprocating compressor, constructed, modified, or reconstructed after 8/23/11 and located between the wellhead and the point of custody transfer to the natural transmission and storage segment, shall meet the requirements of 40 CFR Part 60, Subpart OOOO no later than 10/15/12 or upon initial startup following that date; and by tracking either the hours of operation or number of months between compressor rod packing replacement.
i.	40 CFR Part 60, Subpart A (60.1-60.19)	General provisions may apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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, 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.

This PTI P0115003 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

i. The emissions from the engine are ventedto anoxidation catalyst controlling CO and VOC emissions bya minimum of 90 and 80 percent respectively, at all times the emissions unit is in operation;

ii. CO emissions shall not exceed 5.14 tons/year; and

iii. VOC emissions shall not exceed 2.40 tons/year.

c. 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 BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and NOx emissions from this air contaminant source since the uncontrolled potentialtoemit for PE and NOx emissionsare less than 10 tons/year.

d. See 40 CFR Part 60, Subpart JJJJ (40 CFR 60.4230-60.4248).

c) Operational Restrictions

(1) The permittee shall install and operate the engines with an oxidation catalyst for the control of CO and VOC emissions whenever this emissions unit is in operation and shall maintain the engines in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the engine is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the engine shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The permittee shall burn only natural gas in this emissions unit.

(4) See 40 CFR Part 60, Subpart JJJJ (40 CFR 60.4230-60.4248).

(5) See 40 CFR Part 60, Subpart OOOO (40 CFR 60.5360-60.5430).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the engines, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct periodic inspections of the engine to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the engine and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the engine and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall maintain records that document any time periods when the oxidation catalyst was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the engine was not operated according to the manufacturer’s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(7) See 40 CFR Part 60, Subpart JJJJ (40 CFR 60.4230-60.4248).

(8) See 40 CFR Part 60, Subpart OOOO (40 CFR 60.5360-60.5430).

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(4) See 40 CFR Part 60, Subpart JJJJ (40 CFR 60.4230-60.4248).

(5) See 40 CFR Part 60, Subpart OOOO (40 CFR 60.5360-60.5430).

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. Design Efficiency Standard:

Install an engine that is designed to meet the following:

0.50 g/hp-hr of NOx emissions;

0.30 g/hp-hr of CO emissions; and

0.14 g/hp-hr of VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in f)(2).

b. Emissions Limitations:

This PTI P0115003 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

i. The emissions from the engine are ventedto anoxidation catalyst controlling CO and VOC emissions bya minimum of 90 and 80 percent respectively, at all times the emissions unit is in operation;

ii. CO emissions shall not exceed 5.14 tons/year; and

iii. VOC emissions shall not exceed 2.40 tons/year.

Applicable Compliance Method:

The voluntary annual emissions limitations restriction was derived by the following calculation:

<u>CO emissions limitation:</u>

Compliance with the voluntary annual emission limitation above shall be determined by dividing 0.30 g/BHP-hr (the manufacturer supplied emission factor, including the 90% control efficiency of the catalytic converter) by 454 g/lb,, and then multiplying by 1,775 brake-horsepower (the maximum power output rating of this unit), multiplying by the maximum annual hours of operation (8,760 hours), and dividing by 2,000 lbs per ton.

VOC emissions limitation:

Compliance with the voluntary annual emission limitation above shall be determined by dividing 0.14 g/BHP-hr (the manufacturer supplied emission factor, including the 80% control efficiency of the catalytic converter) by 454 g/lb,, and then multiplying by 1,775 brake-horsepower (the maximum power output rating of this unit), multiplying by the maximum annual hours of operation (8,760 hours), and dividing by 2,000 lbs per ton.

c. Emissions Limitations:

PE shall not exceed 0.062 pound/million Btu of actual heat input.

PE shall not exceed 0.05 ton per month averaged over a twelve-month, rolling period

Applicable Compliance Method:

The short term emissions limit was derived from OAC rule 3745-17-11(B)(5)(b).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The ton per month averaged over a twelve-month, rolling period emission limitation was derived by multiplying the emission factor of 0.00991 pound/million Btu, the emission factor is specified in AP-42 Table 3.2-3 (7/00), multiplied by 13.40 MMBtu/hr rating of the unit, and then multiplying by the hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton. The annual emissions are then divided by 12 months to determine the monthly allowable averaged over a twelve-month, rolling period.

d. Emissions Limitations:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

e. Emissions Limitations:

NO_x emissions shall not exceed 1.0 g/HP-hr and 82 ppmvd at 15% O_2.
CO emissions shall not exceed 2.0 g/HP-hr and 270 ppmvd at 15% O_2.
VOC emissions shall not exceed 0.7 g/HP-hr and 60 ppmvd at 15% O_2.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in f)(2).

(2) When purchasing a non-certified engine, the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions. In addition, the permittee must conduct an initial performance test.

The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e) and OAC rule 3745-31-05(A)(3) by performing a stack test, and therefore the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244; 40 CFR Part 60, Subpart JJJJ Table 1; and the following requirements:

a. An initial performance test shall be performed to demonstrate compliance with the mass emissions limitations in 40 CFR 60.4233(e) and OAC rule 3745-31-05(A)(3) for VOC, NO_X, and CO, within60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. If the stationary internal combustion engine is rebuilt, or undergoes major repair or maintenance the permittee shall conduct subsequent performance test.

c. Each performance test must be conducted within 10% of 100% peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 1of 40 CFR Part 60, Subpart JJJJ.

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

e. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the

Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) Any amendment to 40 CFR Part 60, Subpart OOOO shall supersede the compliance limitations and/or options contained in this permit.

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4. Emissions Unit Group -4.41 MMBtu (605HP) NG Generator: P011, P012 and P013

EU ID	Operations, Property and/or Equipment Description
P011	605 HP (4.41 MMBtu/hr) natural gas fired 4 stroke - rich burn, non-emergency, NSCR Generator #1 equipped with a NSCR catalyst to control NOx, CO, VOC, and HAP.
P012	605 HP (4.41 MMBtu/hr) natural gas fired 4 stroke - rich burn, non-emergency, NSCR Generator #2 equipped with a NSCR catalyst to control NOx, CO, VOC, and HAP.
P013	605 HP (4.41 MMBtu/hr) natural gas fired 4 stroke - rich burn, non-emergency, NSCR Generator #2 equipped with a NSCR catalyst to control NOx, CO, VOC, and HAP.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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) and ORC 3704.03(T)	Install a generator that is designed to meet 2.00 g/hp-hr of carbon monoxide (CO) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Install a generator that is designed to meet the following: 1.0 g/hp-hr of nitrogen oxide (NO_X) emissions; and 0.70 g/hp-hr of volatile organic compounds (VOC) emissions. PE from the stack serving this emissions unit shall not exceed 0.02 ton per month averaged over a twelve-month, rolling period. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c. below.
c.	40 CFR Part 60, Subpart JJJJ	NOx emissions shall not exceed 1.0 g/hp-

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(40 CFR 60. 4230 – 60.4248) [In accordance with 40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1, this emissions unit is a 605hp, natural gas-fired, stationary spark internal combustion engine manufactured afterJuly 1, 2010 that islocated at a new natural gas compressor station and is subject to the emission limitations and controlmeasures specified in this section.]	hr or 82ppmvd at 15% oxygen (O_2). CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2. VOC emissions shall not exceed 0.7 g/hp-hror 60ppmvd at 15% O_2. [40 CFR Part 60.4233(e) and 40 CFR Part 60, Subpart JJJJ, Table 1]
d.	40 CFR Part 60.1 – 19 (40 CFR 60.4246)	Table 3 to Subpart JJJJ of 40 CFR Part 60 – Applicability of General Provisions to Subpart JJJJ shows which part of the General Provisions in 40 CFR Part 60.1 – 19 apply.
e.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 pound/million Btu actual heat input.
f.	OAC rule 3745-17-07(A)(1)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a six-minute average, except as provided by the rule.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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, 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 and NO_x emissions from this air contaminant source since the calculated annual emission rate for VOC and NO_x emissions is

less than 10 tons/yr taking into account the federally enforceable rule limit of 1.00 g/hp-hr of NO_x and 0.70 g/hp-hr of VOC under 40 CFR Part 60, Subpart JJJJ.

c. 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 BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the uncontrolled potentialtoemit for PE is less than 10 tons/year.

d. See 40 CFR Part 60, Subpart JJJJ(40 CFR 60. 4230 – 60.4248).

c) Operational Restrictions

(1) The permittee shall install and operate a generator with a NSCR catalyst for the control of CO, NO_x and VOC emissions whenever this emissions unit is in operation and shall maintain the generator in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the generator is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the generator shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The permittee shall burn only natural gas in this emissions unit.

(4) See 40 CFR Part 60, Subpart JJJJ(40 CFR 60. 4230 – 60.4248).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the generator, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct periodic inspections of the generator to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the generator and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the generator and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall maintain records that document any time periods when the NRCS catalyst was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the generator was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(7) See 40 CFR Part 60, Subpart JJJJ(40 CFR 60. 4230 – 60.4248).

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(4) See 40 CFR Part 60, Subpart JJJJ(40 CFR 60. 4230 – 60.4248).

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 method:

a. Design Efficiency Standard:

Install a generator that is designed to meet 2.00 g/hp-hr of CO emissions.

Install a generator that is designed to meet the following:

1.0 g/hp-hr of NO_X emissions; and

0.70 g/hp-hr of VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emissions testing requirements specified in f)(2).

b. Emissions Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

c. Emissions Limitation:

PE shall not exceed 0.062 pound/million Btu of actual heat input.

PE from the stack serving this emissions unit shall not exceed 0.02 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The short term emissions limit was derived from OAC rule 3745-17-11(B)(5)(b).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The ton per month averaged over a twelve-month, rolling period emission limitation was derived by multiplying the emission factor of 0.00991 pound/million Btu, the emission factor is specified in AP-42 Table 3.2-3 (7/00), multiplied by 4.41MMBtu/hr rating of the unit, and then multiplying by the hours of operation, 8,760 hours/year, and dividing by 2,000 pounds/ton. The annual emissions are then divided by 12 month to determine the monthly allowable averaged over a twelve-month, rolling period.

d. Emissions Limitations:

NOx emissions shall not exceed 1.0 g/hp-hr or 82ppmvd at 15% oxygen (O_2).

CO emissions shall not exceed 2.0 g/hp-hr or 270 ppmvd at 15% O_2.

VOC emissions shall not exceed 0.7 g/hp-hror 60ppmvd at 15% O_2.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emissions testing requirements specified in f)(2).

(2) When purchasing a non-certified engine, the permittee shall demonstrate compliance with the emission standards specified in 40 CFR 60.4233(e) and according to the requirements specified in 40 CFR 60.4244, as applicable. The permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practices for minimizing emissions. In addition, the permittee must conduct an initial performance test.

The permittee has chosen to demonstrate compliance with the emission standards specified in §60.4233(e), OAC rule 3745-31-05(A)(3) and ORC 3704.03(T) by performing a stack test, and therefore the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the procedures specified in 40 CFR 60.4244; 40 CFR Part 60, Subpart JJJJ Table 1; and the following requirements:

a. An initial performance test shall be performed to demonstrate compliance with the mass emissions limitations in 40 CFR 60.4233(e), OAC rule 3745-31-05(A)(3) and ORC 3704.03(T) for VOC, NO_X, and CO, within60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. If the stationary internal combustion engine is rebuilt, or undergoes major repair or maintenance the permittee shall conduct subsequent performance test.

c. Each performance test must be conducted within 10% of 100% peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 1of 40 CFR Part 60, Subpart JJJJ.

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

e. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

f. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.

5. P014, Standard flare – control of emissions from condensate and processed water tank working, breathing, flashing loss and control of emissions from truck loading of condensate and processed water

Operations, Property and/or Equipment Description:

14,129 scfh (19.91 mmBtu/hr) rated standard flare with assist gas (23,725,000 scf/yr and 61,382 mmBtu/year use based on loading and tank use) to control emissions from condensate and processed water storage tank working, breathing, flashing loss (T001) and control of emissions from truck loading of condensate and processed water (J001).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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) and ORC 3704.3(T)	Total carbon monoxide (CO) emissions from the pilot gas, assist gas and flared gas shall not exceed 1.03 tons per month averaged over a twelve-month, rolling period.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Total nitrogen oxide (NOx) emissions from the pilot gas, assist gas and flared gas shall not exceed 0.28 ton per month averaged over a twelve-month, rolling period. See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265

changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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, 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 BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx emissions from this air contaminant source since the uncontrolled potentialtoemit for NOx emissions is less than 10 tons/year.

c) Operational Restrictions

(1) The permittee shall install and operate a flare for the control of VOC emsisions whenever this emissions unit is in operation and shall maintain the flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct periodic inspections of the flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the flare and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the flare and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall maintain records that document any time periods when the flare was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the flare was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit.

(7) The permittee shall record the total scf of flared gas and assist gas sent to the flare each year.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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 Limitations:

Total CO emissions from the pilot gas, assist gas and flared gas shall not exceed 1.03 tons per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The tons per month averaged over a twelve-month, rolling period emissions limitation was established based on the below calculations. Compliance with the emissions limitation shall be determined by using the below calculations and the actual scf of gas flared as recorded in d)(7).

Pilot gas emissions:

(84 lb/mmscf)(70 scf/hr)(1/1,000,000)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.0257544 ton/year

Flared gas emissions:

(0.37 lb/mmBtu)(61,382 mmBtu/yr)(1 ton/2,000 lbs) = 11.36 tons/year

Assist gas emissions:

(84 lb/mmscf)(23,725,000 scf/yr)(1/1,000,000)(1 ton/2,000 lbs) = 1.00 ton/year

Total CO emissions:

0.02575 ton/year + 11.36 + 1.00 tons/year = 12.38 tons/year

12.38 tons/year divided by 12 months = 1.03 tons of CO per month averaged over a twelve-month, rolling period.

Where:

84 lb/mmscf = emission factor from AP-42, Table 1.4-1 (7/98)

70 scf/hr = as submitted in application

23,725,000 scf/yr = as submitted in application

61,382 mmBtu/yr = as submitted in application

0.37 lb/mmBtu = emission factor from AP-42, Table 13.5-1 (1/95)

b. Emissions Limitations:

Total NOx emissions from the pilot gas, assist gas and flared gas shall not exceed 0.28 ton averaged over a 12-month, rolling period.

Applicable Compliance Method:

The tons per month averaged over a twelve-month, rolling period emissions limitation was established based on the below calculations. Compliance with the emissions limitation shall be determined by using the below calculations and the actual scf of gas flared as recorded in d)(7).

Pilot gas emissions:

(100 lb/mmscf)(70 scf/hr)(1/1,000,000)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.0306 ton/year

Flared gas emissions:

(0.068 lb/mmBtu)(61,382 mmBtu/yr)(1 ton/2,000 lbs) = 2.08699 ton/year

Assist gas emissions:

(100 lb/mmscf)(23,725,000 scf/yr)(1/1,000,000)(1 ton/2,000 lbs) = 1.186 ton/year

Total NOx emissions:

0.0306 ton/year + 2.08699 + 1.186 tons/year = 3.304 ton/year

3.304 tons/year divided by 12 months = 0.28 ton per month averaged over a 12-month, rolling period.

Where:

100 lb/mmscf = emission factor from AP-42, Table 1.4-1 (7/98)

70 scf/hr = as submitted in application

23,725,000 scf/yr = as submitted in application

61,382 mmBtu/yr = as submitted in application

0.068 lb/mmBtu = emission factor from AP-42, Table 13.5-1 (1/95)

g) Miscellaneous Requirements

(1) None.

6. P015, Standard flare (32.29 MMBtu/hr) to control flash tank off-gases

Operations, Property and/or Equipment Description:

26,665 scfh (32.29 MMBtu/hr) standard flare to control flash tank off-gases associated with the dehydration process during the 5% annual down time where both the flash gas compressors are down due to maintenance activities. Flare is permitted with the flare pilot gas and assist gas burning at 8,760 hours/year and the inherent limitation of flash tank off-gases flaring at 438 hours/year.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 11/30/01	Install a flare and capture system with a design capture efficiency of at least 100% and a design control efficiency of at least 98% for volatile organic compound (VOC) emissions. Total nitrogen oxide (NOx) emissions from the pilot gas, assist gas and flared gas shall not exceed 0.04 tons per month averaged over a twelve-month, rolling period. Total carbon monoxide (CO) emissions from the pilot gas, assist gas and flared gas shall not exceed 0.22 ton per month averaged over a twelve-month, rolling period. See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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, 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.

This PTI P0115003 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

i. The VOC emissions from the flash tank off-gases associated with the dehydration processshall be ventedto a flare with a minimum of 100% capture efficiency and 98% control efficiency anytime that the flash tank off-gases are not routed to the compressors due to maintenance activities; and

ii. VOC emissions shall not exceed 1.90 tons/year.

c. 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 BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx and CO emissions from this air contaminant source since the uncontrolled potential-to-emit for NOx and CO emissions is less than 10 tons/year.

c) Operational Restrictions

(1) The permittee shall install and operate a flare for the control of VOC emsisions whenever this emissions unit is in operation and shall maintain the flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) Any time the flash gas compressors are not in operation due to maintenance activities, the flash tank off-gases shall be vented to a flare with 100% capture efficiency and 98% control efficiency of VOC emissions.

(4) The permittee shall burn only natural gas in this emissions unit.

(5) As the flare is used for periodic maintenance, an inherent operational limitation of 438 hours/yr has been established for the flaring of flash tank off-gases for maintenance activities associated with the compressors.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct periodic inspections of the flare to determine whether it is operating in accordance with the manufacturer’s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer’s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the flare and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the flare and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall maintain records that document any time periods when the flare was not in service when the emissions unit(s) was in operation and the flash tank off-gases where not being routed to the compressors, as well as, a record of all operations during which the flare was not operated according to the manufacturer’s recommendations with

any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) The permittee shall record the operating times each day for the flare and process operations. The records shall include total number of hours per calendar year in which the flare was used to control the flash tank-off gases due to maintenance activities associated with the compressors.

(7) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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. Design Efficiency Standard:

Install a flare and capture system with a design capture efficiency of at least 100% and a design control efficiency of at least 98% for VOC emissions.

Applicable Compliance Method:

Compliance is demonstrated by the manufacturer’s design efficiency of adesign capture efficiency of at least 100% and a design control efficiency of at least 98% for VOC emissions.

b. Emissions Limitation:

This PTI P0115003 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

i. The VOC emissions from the flash tank off-gases associated with the dehydration processshall be ventedto a flare with a minimum of 100%

capture efficiency and 98% control efficiency anytime that the flash tank off-gases are not routed to the compressors due to maintenance activities; and

ii. VOC emissions shall not exceed 1.90 tons/year.

Applicable Compliance Method:

The voluntary annual emissions limitation was established based on the below calculations. Compliance with the emissions limitation shall be determined by using the below calculations and the actual hours of operation as recorded in d)(6).

Pilot gas emissions:

(5.5 lb/mmscf)(11 scf/hr)(1/1,000,000)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.00026499 ton/year

Flared gas emissions:

(8.69lbs/hr)(438 hrs/year)(1 ton/2,000 lbs) = 1.90311 tons/year

Assist gas emissions:

(5.5 lb/mmscf)(29 scf/hr)(1/1,000,000)(8,760 hr/year)(1 ton/2,000 lbs) = 0.00069861

Total VOC emissions:

0.00026499 ton/year + 1.90311 tons/year +0.00069861 = 1.90 tons/year

Where:

5.5 lb/mmscf = emission factor from AP-42 Table 1.4-1 (7/98)

11 scf/hr = as submitted in application

29 scf/hr =as submitted in application

8.69 lbs/hr = VOC emissions estimated as submitted in application plus 10% to account for variation in gas, based on a 98% control efficiency.

c. Emissions Limitation:

Total NOx emissions from the pilot gas, assist gas and flared gas shall not exceed 0.04 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The ton per month averaged over a twelve-month, rolling period emissions limitation was established based on the below calculations. Compliance with the

emissions limitation shall be determined by using the below calculations and the actual hours of operation as recorded in d)(7).

Pilot gas emissions:

(100 lb/mmscf)(11 scf/hr)(1/1,000,000)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.004818 ton/year

Flared gas emissions:

(0.068 lb/mmBtu)(32.29 mmBtu/hr)(438 hrs/year)(1 ton/2,000 lbs) = 0.48086268 tons/year

Assist gas emissions:

(100lb/mmscf)(29 scf/hr)(1/1,000,000)(8,760 hr/year)(1 ton/2,000 lbs) = 0.012702 tons/year

Total NOx emissions:

0.004818 ton/year + 0.48086268 tons/year + 0.012702 = 0.50 ton/year

0.50 tons/year divided by 12 months = 0.04 ton of NOx per month averaged over a twelve-month, rolling period.

Where:

100 lb/mmscf = emission factor from AP-42, Table 1.4-1 (7/98)

11 scf/hr = as submitted in application

32.29 mmBtu/hr = rating of flare as submitted in application

29 scf/hr = rating of flare as submitted in application

0.068 lb/mmBtu = emission factor from AP-42, Table 13.5-1 (1/95)

d. Emissions Limitation:

Total CO emissions from the pilot gas, assist gas and flared gas shall not exceed 0.22 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The ton per month averaged over a twelve-month, rolling period emissions limitation was established based on the below calculations. Compliance with the emissions limitation shall be determined by using the below calculations and the actual hours of operation as recorded in d)(7).

Pilot gas emissions:

(84 lb/mmscf)(11 scf/hr)(1/1,000,000)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.00404712 ton/year

Flared gas emissions:

(0.37 lb/mmBtu)(32.29 mmBtu/hr)(438 hrs/year)(1 ton/2,000 lbs) = 2.6164587 tons/year

Assist gas emissions:

(84lb/mmscf)(29 scf/hr)(1/1,000,000)(8,760 hr/year)(1 ton/2,000 lbs) = 0.01066968 tons/year

Total CO emissions:

0.00404712 ton/year + 2.6164587 tons/year + 0.01066968 tons/year = 2.63 tons/year

2.63 tons/year divided by 12 months = 0.22 ton of CO per month averaged over a twelve-month, rolling period.

Where:

84 lb/mmscf = emission factor from AP-42, Table 1.4-1 (7/98)

11 scf/hr = as submitted in application

32.29 mmBtu/hr = as submitted in application

29 scf/hr = as submitted in application

0.068 lb/mmBtu = emission factor from AP-42, Table 13.5-1 (1/95)

g) Miscellaneous Requirements

(1) None.

7. P016,Enclosed flare (2.51 MMBtu/hr) to control non-condensable still vent vapors

Operations, Property and/or Equipment Description:

1,158 scfh (2.51 MMBtu/hr) enclosed flare – 100% capture and 98% control efficiency of VOC emissions from the non-condensable still vent vapors associated with the dehydration process (including emissions from three 110-MMSCFD dehydration units).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 11/30/01	Install a flare and capture system with a design capture efficiency of 100% and a design control efficiency of at least 98% for volatile organic compound (VOC) emissions. Total nitrogen oxide (NOx) emissions from the pilot gas and flared gas shall not exceed 0.06 ton per month averaged over a twelve-month, rolling period. Total carbon monoxide (CO) emissions from the pilot gas and flared gas shall not exceed 0.34 ton per month averaged over a twelve-month, rolling period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2,006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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 limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2,006 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 NO_X and CO emissions from this air contaminant source since the uncontrolled potential to emit for NOx and CO emissions is less than 10 tons/yr.

c. 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.

PTI P0115003 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Total VOC emissions from the pilot gas and flared gas combined shall not exceed 9.15 tons per year; and

ii. VOC emissions from the non-condensable still vent vapors associated with the dehydration process shall be vented to the flare with 100% capture efficiency and 98% capture efficiency.

c) Operational Restrictions

(1) The permittee shall install and operate a flare for the control of VOC emsisions whenever this emissions unit is in operation and shall maintain the flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The permittee shall burn only natural gas in this emissions unit.

(4) A pressure sensor shall be maintained at all times on the flare to detect the need for a flame.

(5) The device to monitor the flare for the presence of flame shall be in operation at all times the pressure sensor detects a need for a flame.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct periodic inspections of the flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the flare and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the flare and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall maintain records that document any time periods when the flare was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the flare was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) The permittee shall maintain records of each day a fuel other than natural gas is burned in this emissions unit.

(7) The permittee shall properly install, operate, and maintain a pressure sensor and flame detection device to monitor the need for a flame and presence of a flame, respectively, when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

(8) The permittee shall record the following information each day for the flare and process operations:

a. All periods during which the pressure sensor and/or flame detection device were not functioning properly; and

b. The operating times for the flare and monitoring equipment.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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. Design Efficiency Standard:

Install a flare and capture system with a design capture efficiency of 100% and a design control efficiency of at least 98% for VOC emissions.

Applicable Compliance Method:

Compliance is demonstrated by the manufacturer's design efficiency of adesign capture efficiency of at least 100% and a design control efficiency of at least 98% for VOC emissions.

b. Emissions Limitations:

PTI P0115003 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. Total VOC emissions from the pilot gas and flared gas combined shall not exceed 9.15 tons per year; and

ii. VOC emissions from the non-condensable still vent vapors associated with the dehydration process shall be vented to the flare with 100% capture efficiency and 98% capture efficiency.

Applicable Compliance Method:

The voluntary annual restricted emissions limitation was established based on the following calculations:

Pilot gas emissions:

(5.5 lb/mmscf)(11 scf/hr)(1/1,000,000)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.0003 ton/year

Flared gas emissions:

(2.09 lbs/hr)(8,760 hrs/year)(1 ton/2,000 lbs) = 9.15 tons/year

Total VOC emissions:

0.0032 ton/year + 9.15 tons/year = 9.15 tons/year

Where:

5.5 lb/mmscf = emission factor from AP-42 Table 1.4-1 (7/98)

11 scf/hr = as submitted in application

2.09 lbs/hr = VOC emissions estimated as submitted in application, based on a 98% control efficiency.

c. Emissions Limitations:

Total CO emissions from the pilot gas and flared gas shall not exceed 0.34 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The emissions limitation was established based on the following calculations:

Pilot gas emissions:

(84 lb/mmscf)(11 scf/hr)(1/1,000,000)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.004 ton/year

Flared gas emissions:

(0.37 lb/mmBtu)(2.51 mmBtu/hr)(8,760 hrs/year)(1 ton/2,000 lbs) = 4.07 tons/year

Total CO emissions:

0.004 ton/year + 4.07 tons/year = 4.07 tons/year

4.07 tons/year divided by 12 months = 0.34 ton of CO per month averaged over a twelve-month, rolling period.

Where:

84 lb/mmscf = emission factor from AP-42, Table 1.4-1 (7/98)

11 scf/hr = as submitted in application

2.51 mmBtu/hr = rating of flare as submitted in application

0.37 lb/mmBtu = emission factor from AP-42, Table 13.5-1 (1/95)

d. Emissions Limitations:

Total NOx emissions from the pilot gas and flared gas shall not exceed 0.06 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The emissions limitation was established based on the following calculations:

Pilot gas emissions:

(100 lb/mmscf)(11 scf/hr)(1/1,000,000)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.005 ton/year

Flared gas emissions:

(0.068 lb/mmBtu)(2.51 mmBtu/hr)(8,760 hrs/year)(1 ton/2,000 lbs) = 0.75 ton/year

Total NOx emissions:

0.005 ton/year + 0.75 tons/year = 0.75 ton/year

0.75 ton/year divided by 12 months = 0.06 tons of NOx per month averaged over a twelve-month, rolling period.

Where:

100 lb/mmscf = emission factor from AP-42, Table 1.4-1 (7/98)

11 scf/hr = as submitted in application

2.51 mmBtu/hr = rating of flare as submitted in application

0.068 lb/mmBtu = emission factor from AP-42, Table 13.5-1 (1/95)

g) Miscellaneous Requirements

(1) None.

8. P017, Equipment maintenance blowdown emissions

Operations, Property and/or Equipment Description:

Fugitive equipment maintenance blowdown emissions where it is not feasible to vent to a flare for control; based on a maximum of 60 events per engine per year (of P001 thru P010 and 5 electric compressors), equal to approximately 13.44 tons of VOC emissions per year total.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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) & ORC 3704.03(T)	Fugitive volatile organic compound (VOC) emissions shall not exceed 1.12 tons per month averaged over a twelve-month, rolling period.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records on a monthly basis:

a. the date, number and type of each maintenance blowdown event;

b. mole% of each VOC component in the gas stream using a representative analysis;

c. total volume of gas emitted from each maintenance blowdown event;

d. total volume of gas emitted from all maintenance blowdown events as tons per month, rolling, 12-month total; and

e. total tons of VOC per month averaged over a rolling, 12-month period.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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:

Fugitive VOC emissions shall not exceed 1.12 tons per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The VOC emissions limitation was established by the following calculation using the inputs provided in the permittee's application, provided gas analysis plus 10% safety factor and the recordkeeping requirements in d)(1):

VOC (tons per month averaged over a twelve-month, rolling period) =
[Total VOC estimate for P001-P010 and 5 electric compressors one hour blowdown event combined X # of events per year X 1 ton/2,000 pounds]/12 months

Where:

Total VOC emissions estimate per one hour event for P001 thru P010 = 447.98 lbs/event (based on 31,950 scf/event for P001 thru P010, 0.057 lb/scf and 22.78% VOC of gas stream and a 10% safety factor as submitted in application)

Total maximum events per year = 60 blowdowns per engine (as submitted in application)

g) Miscellaneous Requirements

(1) None.

9. P023, Pigging emissions

Operations, Property and/or Equipment Description:

Fugitive pigging emissions; based on a maximum of 70 events per year, equal to approximately 3.15 tons of VOC emissions per year total.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 11/30/01	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.26 ton per month averaged over a twelve-month, rolling period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2,006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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 limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2,006 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 emissions is less than 10 tons/yr.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records on a monthly basis:

a. the date, number and type of each maintenance pigging event;

b. mole% of each VOC component in the gas stream using a representative analysis;

c. total volume of gas emitted from each maintenance pigging event; and

d. total volume of gas emitted from all maintenance pigging events as a tons per month, rolling, 12-month total.

e. total tons of VOC emissions per month averaged over rolling, 12-month period.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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:

Fugitive VOC emissions shall not exceed 0.26 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

The VOC emissions limitation was established by the following calculation using the inputs provided in the permittee's application, provided gas analysis plus 10% safety factor and the recordkeeping requirements in d)(1):

VOC (tons per month, averaged over a twelve-month, rolling period) = [Total lb/event VOC estimate per one hour pigging event X # of one hour Piggingevents per year X 1 ton/2,000 pounds]/12 months

Where:

Total VOC emissions estimate per one hour event = 90.07 lbs/event (based on 6,994 scf/event, 0.057 lb/scf and 22.78% VOC of gas stream as submitted in application)

Total maximum one hour pigging events per year = 70 (as submitted in application)

g) Miscellaneous Requirements

(1) None.

10. P801, Equipment leaks

Operations, Property and/or Equipment Description:

Fugitive equipment leaks from various components, including connectors, flanges, compressors, open ended lines, pump seals, and valves.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 11/30/01	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.55 ton per month averaged over a twelve-month, rolling period. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions 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 revision 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 limits/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 emissions 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:

b. An initial and then annual inspection of the auxiliary 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.

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

d. 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.

e. Documentation that includes the following:

i. the date the inspection was conducted;

ii. the name of the employee conducting the leak check;

iii. the identification of any component that was determined to be leaking; and

iv. the date the component was repaired and determined to no longer be leaking.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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:

Fugitive VOC emissions shall not exceed 0.55 ton per month averaged over a twelve-month, rolling period

Applicable Compliance Method:

The rolling, 12-month VOC emissions limitation was established by the following calculation based on the emissions factors (lb/hr/component) provided in the permittee's application and the provided speciated gas analysis (VOC emissions + 10% safety factor):

VOC = [(# of valves in gas service X gas service valve EF X 0.227755 VOC wt fraction + 10%)

+ (# of valves in light oil service X light oil service valve EF X 1.0 VOC wt fraction + 10%)

+ (# of pump seals in light oil service X light oil service pump EF X 1.00 VOC wt fraction+ 10%)

+ (# of flanges in gas service X gas service flange EF X 0.227755 VOC wt fraction + 10%)

+ (# of connectors in gas service X gas service connector EF X 0.227755 VOC wt fraction+ 10%)

+ (# of connectors in light oil service X light oil service connector EF X 1.00 VOC wt fraction + 10%)

+ (# of compressor seals in gas service X gas service compressor seals EF X 0.227755 VOC wt fraction + 10%)

+ (# of relief valves in gas service X gas service relief valve EF X 0.227755 VOC wt fraction + 10%),

+ (# of other sources in gas service X gas service other sources EF X 0.227755 VOC wt fraction + 10%)

+ (# of other sources in light oil service X light oil service other sources EF X 1.0 VOC wt fraction + 10%)], then

X 8,760 hrs/yr X 1 ton/2,000 lbs and divided by 12 months ≤ 0.55 ton per month averaged over a twelve-month, rolling period. .

Where:

Valve EFs = 0.00992lb/hr/source for gas service, and 0.00551lb/hr/source for light oil service

Pump Seal EFs = 0.0287lb/hr/source for light oil service;

Flange EFs =0.000860 lb/hr/source for gas service;

Connector EFs =0.000441lb/hr/source for gas service, and 0.000463lb/hr/source for light oil service;

Compressor seals EFs =0.0194lb/hr/source for gas service;

Relief valves EFs =0.0194lb/hr/source for gas service; and

Other sources* EFs = 0.0.194 lb/hr/source for gas service; and 0.0165 lb/hr/source for light oil service

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

g) Miscellaneous Requirements

(1) None.

11. T001, Condensate and produced water storage tanks

Operations, Property and/or Equipment Description:

Condensate and Produced water storage including five 400 bbl (16,800 gallon) condensate storage tanks and three 400 bbl (16,800 gallon) produced water storage tanks. All working, breathing, and flashing emissions vented to a VRU with 100% control efficiency or vented to standard flare (P014) with a 98% over all control efficiency of VOC. Tank emissions are permitted at worst case assuming all emissions are vented to the flare.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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) & ORC 3704.03(T)	Install a flare and capture system with a design over all control efficiency of at least 98% for volatile organic compound (VOC) emissions.
b.	40 CFR Part 60, Subpart OOOO (60.5360-60.5430) [In accordance with 60.5365 (e), this emissions units constitutes a storage vessel that is located at an affected crude oil and natural gas production, transmission and distribution facility]	Each tank at this facility has a potential to emit after control of less than 6 TPY and are therefore, exempt from the requirements of 40 CFR Part 60, Subpart OOOO Following the compliance date of October 15, 2013, each storage vessel constructed, modified, or reconstructed after August 23, 2011 and with VOC emissions calculated to exceed 6 tons per year, shall reduce VOC emissions by 95% or greater.
c.	40 CFR Part 60, Subpart A (60.1-60.19)	General provisions may apply.

(2) Additional Terms and Conditions

a. See 40 CFR Part 60, Subpart OOOO (40 CFR 60.5360-60.5430).

c) Operational Restrictions

(1) The permittee shall install and operate a flare for the control of VOC emissions whenever this emissions unit is in operation and shall maintain the flare in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) Emissions from working, breathing, and flashing loss shall be vented to a flare with a VOC overall control efficiency of 98% or vented to a vapor recovery unit (VRU) with a VOC control efficiency of 100%. The flare shall be designed and operated as required in emissions unit P014.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the flare, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(2) The permittee shall conduct periodic inspections of the flare to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the flare and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the flare and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(5) The permittee shall maintain records that document any time periods when the flare was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the flare was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) The permittee shall record the annual throughput of condensate and produced water in gallons per year.

(7) See 40 CFR Part 60, Subpart OOOO (40 CFR60.5360-60.5430).

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) See 40 CFR Part 60, Subpart OOOO (40 CFR60.5360-60.5430).

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 method:

a. Design Efficiency Standard:

Install a flare and capture system with a design overall control efficiency of at least 98% for VOC emissions.

Applicable Compliance Methods:

Compliance is demonstrated by the manufacturer's design efficiency of an overall control efficiency of at least 98% for VOC emissions.

g) Miscellaneous Requirements

Any amendment to 40 CFR Part 60, Subpart OOOO shall supersede the compliance limitations and/or options contained in this permit.