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

6/10/2014

Certified Mail

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

Danell Zawaski
Williams Ohio Valley Midstream, Eisenbarth DS
2000 Commerce Drive
Pittsburgh, PA 15275

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0656005019
Permit Number: P0116528
Permit Type: Initial Installation
County: Monroe

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

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

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-SEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Williams Ohio Valley Midstream, Eisenbarth DS

Facility ID:	0656005019
Permit Number:	P0116528
Permit Type:	Initial Installation
Issued:	6/10/2014
Effective:	6/10/2014
Expiration:	6/10/2024

Division of Air Pollution Control
Permit-to-Install and Operate
for
Williams Ohio Valley Midstream, Eisenbarth DS

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Authorization

Facility ID:	0656005019
Application Number(s):	A0050379
Permit Number:	P0116528
Permit Description:	One 30 MMscfd dehydration unit and 0.75 MMBtu/hr reboiler with 7.5 MMBtu/hr thermal oxidizer, truck load out and condensate tank, and fugitive emissions from equipment leaks are the sources of emissions from this new facility.
Permit Type:	Initial Installation
Permit Fee:	$500.00
Issue Date:	6/10/2014
Effective Date:	6/10/2014
Expiration Date:	6/10/2024

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

This document constitutes issuance to:

Williams Ohio Valley Midstream, Eisenbarth DS
Long Ridge Rd and Twp. Rd. 969
Ohio Twp., OH 43931

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0116528
Permit Description: One 30 MMscfd dehydration unit and 0.75 MMBtu/hr reboiler with 7.5 MMBtu/hr thermal oxidizer, truck load out and condensate tank, and fugitive emissions from equipment leaks are the sources of emissions from this new facility.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Dehydrator and Reboiler with Thermal Oxidizer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P801**
Company Equipment ID:	Process Piping Fugitives
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T001**
Company Equipment ID:	Condensate and Truck Load-out
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) 2.

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

      (1) None.

2. Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), for this project were not necessary because for the emissions units not exempted from modeling per OEPA 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 when controlled. OAC Chapter 3745 31 requires permittees to apply for and obtain a new or modified PTIO 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 PTIO.

3. The storage vessel under emission unit T001 and located at this facility are subject to 40 CFR Part 60, Subpart OOOO, New Source Performance Standards (NSPS) for Oil and Natural Gas Production Facilities. The storage vessel is exempt from this subpart per 60.5365(e), since the storage vessel is at natural gas processing segment with a potential to emit VOC less than 6 TPY uncontrolled. The complete 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 appropriate Ohio EPA District office of local air agency.

4. Dehydration process (P001) contained in this permit is subject to 40 CFR Part 63, Subpart HH. The dehydration process at this facility is exempt per 63.764(e)(1)(ii) from the requirements of 63.764(d) due to actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere being less than 0.90 Mg/yr, as determined by the procedures specified in 63.772(b)(2) of 40 CFR 63, Subpart HH. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the e-CFR website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office of local air agency.

5. 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 PTE calculations for this permit.

C. Emissions Unit Terms and Conditions

1. P001, Dehydration Process

Operations, Property and/or Equipment Description:

Dehydration Process including one 30 MMscfd dehydration unit with flash tank off-gas and regenerator emissions controlled by a 8.31 MMBtu/hr (high heat value) thermal oxidizer with a VOC capture efficiency of 100% and a VOC control efficiency of 99%. A portion of the flash tank off-gas is recycled to the reboiler as fuel when practical.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), and ORC 3704.03(T)	Carbon monoxide (CO) emissions from the thermal oxidizer shall not exceed 1.12 tonsper month averaged over a rolling, 12-month period. Install a thermal oxidizer that is designed to meet 100% capture efficiency and 99% control efficiency of volatile organic compound (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Nitrogen oxides (NO_x) emissions from the thermal oxidizer shall notexceed 0.21 ton per month averaged over a rolling, 12-month period. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(b), as	See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	effective 12/01/06	
d.	Part 63, Subpart HH, National Emission Standards for hazardous air pollutants (NESHAP) from Oil and Natural Gas Production Facilities [In accordance with 40 CFR 63.760(a)(2-(3), this emission unit processes, upgrades, or stores natural gas or hydrocarbon liquids prior to the point of custody transfer from the facility.]	See b)(2)c.
e.	40 CFR Part 63.1-15 (40 CFR 63.764)	Table 2 to Subpart HH of 40 CFR Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

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

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

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

c. The dehydration unit located at this facility is subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants (NESHAP) from Oil and Natural Gas Production Facilities. The dehydration unit at this facility is exempt per 63.764(e)(ii) from the requirements of 63.764(d) due to the actual average emission of benzene from the glycol dehydration unit process vent to the

atmosphere are less than 0.9 megagram per year, as determined by the procedures specified in 63.772(b)(2) of 40 CFR Part 63, Subpart HH.

c) Operational Restrictions

(1) The permittee shall install and operate a thermal oxidizer for the control of VOC emissions whenever the dehydration unit is in operation and shall maintain the thermal oxidizer 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 thermal oxidizer it is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the thermal oxidizer shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for thermal oxidizer, 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 thermal oxidizer 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.

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

(3) The permittee shall document each inspection (periodic and annual) of the dehydrator 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.

(4) The permittee shall maintain records that document any time periods when the thermal oxidizer was not in service when the dehydration unit was in operation, as well as, a record of all operations during which the thermal oxidizer 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.

(5) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart HH, including the following sections:

40 CFR 63.774(d)(1)	Record the actual annual benzene emissions calculated as provided by rule.
40 CFR 63.772(b)(1)	Determine actual flowrate of natural gas to the unit by direct measurement or other approved method.
40 CFR 63.772(b)(2)	Use approved modeling program or direct measurement of BTEX using either method specified in 63.772(b)(2)(i) or 63.772(b)(2)(ii).

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in 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:

CO emissions shall not exceed 1.12 tons per month averaged over a rolling, 12-month period.

Applicable Compliance Method:

The emission limitation for CO was established by the following calculation using the emission factors derived from the US EPA AP42 Table 13.5-1 and the maximum rating of the equipment as submitted in the application:

$$\frac{\left(8.31\,\frac{MMBtu}{hr}\right)\left(0.37\,\frac{lb}{MMBtu}\right)\left(8{,}760\,\frac{hrs}{yr}\right)}{2{,}000\,\frac{lbs}{ton}} = 13.47\ tons/yr$$

$$\frac{\left(13.47\frac{tons}{yr}\right)}{12\ months} = 1.12\frac{tons}{months} per\ rolling\ average$$

b. Design Efficiency:

Install a thermal oxidizer that is designed to meet 100% capture efficiency and 99% control efficiency of VOC emissions.

Applicable Compliance Method:

Compliance is demonstrated by the manufacturers guaranteed specifications for the thermal oxidizer with a capture efficiency of 100% and a control efficiency of at least 99%.

c. Emissions Limitation:

NO_x emissions of 0.21 ton per month averaged over a rolling, 12-month period.

Applicable Compliance Method:

The emission limitation for NO_x was established by the following calculation using the emission factors derived from US EPA AP42 Table 13.5-1 and the maximum rating of the equipment as submitted in the application.

$$\frac{\left(8.31\frac{MMBtu}{hr}\right)\left(0.068\frac{lb}{MMBtu}\right)\left(8{,}760\frac{hrs}{yr}\right)}{2{,}000\frac{lbs}{ton}} = 2.48\frac{tons}{yr}$$

$$\frac{2.48\frac{tons}{yr}}{12 - months} = 0.21\frac{tons}{month} per\ rolling\ average$$

g) Miscellaneous Requirements

(1) None.

.

2. P801, Process Piping Fugitives

Operations, Property and/or Equipment Description:

Fugitive emission leaks from various piping components, including connectors, flanges, compressors, open ended lines, pump seals and valves (maximum of 1,578 components).

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	Fugitive Volatile organic compounds (VOC) emissions shall not exceed 1.30 tons per month as a rolling, 12-month period.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in 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 1.30tons per monthas a rolling, 12-month average.

Applicable Compliance Method:

Compliance with thefugitive VOC emissions limitation shall be demonstrated by the following calculation based on the emissions factors provided in Table 2-4 of US EPA's Protocol for Equipment Leak Emission Estimates (11/95) for components in gas, light oil, and water/oil service and the information provided in the permittee's application:

$$\sum\left(component\ count * \max\ leak\ rates * VOC\ fraction * \frac{1{,}000\ g}{kg} * \frac{1\ lb}{453.6\ g} * \frac{8{,}760\ hr}{yr} * \frac{1\ ton}{2{,}000\ lb} * \frac{1\ yr}{12 -\ month\ rolling}\right)$$

$$\leq\ 1.30\ tons/month\ rolling\ 12$$

g) Miscellaneous Requirements

(1) None.

3. T001, Condensate and Truck Load-out

Operations, Property and/or Equipment Description:

Produced Water/Condensate 210 bbl Tank and Truck Load-Out (maximum throughput of 229,320 gallons/year)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01	Volatile Organic Compounds (VOC) emissions shall not exceed 0.057 tons per month averaged over a rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05 (A)(3)(b), as effective 12/01/06	See b)(2)b.

(2) Additional Terms and Conditions

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

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

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

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

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain annual records of the produced water/condensate throughput of the emissions unit, in gallons.

e) Reporting Requirements

(1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in 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:

VOC emissions shall not exceed 0.057 ton per month averaged over rolling, 12-month period.

Applicable Compliance Method:

The emissions limitation for VOC was established by the emissions estimation equations in AP-42 Chapter 5.2 (6/08), and TANKS 4.09d if appropriate, and the

data for flashing losses provided in the permit application and the produced water/condensate truck load out equations below:

$$L_{\mathrm{L}} = 12.46 \times S \times P \times MW \div T \times \ (1 - CE)$$

Where:

L_{L} = Loading loss, lb/1,000 gallons of liquid loaded
S = Saturation factor, use 1.45 for "splash loading"
P = True vapor pressure of liquid loaded, psia. Estimated at 1.5 psia.
MW = molecular weight of vapors, lb/lb-mol (from EPA Tanks 4.0)
T = temperature of bulk liquid loaded, $R^o = F^o + 460$, use 60F°
CE = Overall emission reduction efficiency (collection efficiency x control efficiency)

Total losses:

$$L = \left\{\left(\frac{EPA\ Tanks\ 4.0.9d\ \mathrm{loss}}{\mathrm{year}}\right) \div \left(2,000\,\frac{\mathrm{lbs}}{ton}\right)\right\} + \left\{\left(L_{\mathrm{L}} \times \frac{lbs}{1{,}000 gallons}\right) \div \left(2{,}000\ \frac{lbs}{ton}\right) \times \left(Throughput\ \times 1{,}000\,\frac{gallons}{year}\right)\right\}$$

g) Miscellaneous Requirements

(1) None.