



9/3/2014

Certified Mail

Tom Hadden
EQT Production Co - Dobeck Well Pad
625 Liberty Avenue Suite 1700
Pittsburgh, PA 15222

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0630005022
Permit Number: P0115776
Permit Type: Initial Installation
County: Guernsey

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)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Interim Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
EQT Production Co - Dobeck Well Pad**

Facility ID:	0630005022
Permit Number:	P0115776
Permit Type:	Initial Installation
Issued:	9/3/2014
Effective:	9/3/2014
Expiration:	9/3/2024



Division of Air Pollution Control
Permit-to-Install and Operate
for
EQT Production Co - Dobeck Well Pad

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Final Permit-to-Install and Operate
EQT Production Co - Dobeck Well Pad
Permit Number: P0115776
Facility ID: 0630005022
Effective Date: 9/3/2014

Authorization

Facility ID: 0630005022
Application Number(s): A0049255
Permit Number: P0115776
Permit Description: Oil and Gas Production facility with associated unpaved roadways and parking areas.
Permit Type: Initial Installation
Permit Fee: \$800.00
Issue Date: 9/3/2014
Effective Date: 9/3/2014
Expiration Date: 9/3/2024
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

EQT Production Co - Dobeck Well Pad
6862 Stephens Lane
Cumberland, OH 43732

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

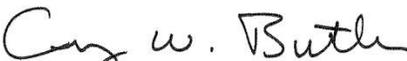
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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: P0115776
 Permit Description: Oil and Gas Production facility with associated unpaved roadways and parking areas.

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:	F001.1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	F001.2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T001
Company Equipment ID:	T001.1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
EQT Production Co - Dobeck Well Pad
Permit Number: P0115776
Facility ID: 0630005022
Effective Date: 9/3/2014

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 being permanently shut down without first applying for and obtaining a permit pursuant to 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.



Final Permit-to-Install and Operate
EQT Production Co - Dobeck Well Pad
Permit Number: P0115776
Facility ID: 0630005022
Effective Date: 9/3/2014

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. Multiple emissions units contained in this permit must comply with various federal New Source Performance Standards (NSPS). The complete NSPS requirements 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 or local air agency. The permittee shall comply with any applicable requirements of 40 CFR Part 60 Subpart OOOO once it becomes rule.
3. The requirements of this permit are not intended to supersede any Ohio Department of Natural Resources requirements.
4. The permittee remains subject to all applicable federal law and regulations and all applicable provisions of the Ohio State Implementation Plan as approved by the Administrator of the U.S. EPA. The provisions of the Ohio State Implementation Plan are independently enforceable by the U.S. EPA.
5. 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.



Final Permit-to-Install and Operate
EQT Production Co - Dobeck Well Pad
Permit Number: P0115776
Facility ID: 0630005022
Effective Date: 9/3/2014

C. Emissions Unit Terms and Conditions



1. P801, Equipment Leaks

Operations, Property and/or Equipment Description

Ancillary equipment¹ and associated equipment: compressors, pumps, piping, pneumatic controllers, gas-water/condensate/oil separators, etc. Equipment/pipeline leaks from a total of 282 valves, 6 pressure relief devices, 15 open end valves or lines, and 1 pump and compressor seals and 924 flanges/connectors in VOC or wet gas service.

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	Develop and implement a control plan designed to minimize or eliminate fugitive leaks. See b)(2)a. and b)(2)b., b)(2)c., and c)(2) below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/2006	See b)(2)b. below.
c.	40 CFR Part 60 Subpart OOOO [In accordance with 40 CFR 60.5365	This emissions unit is subject to the requirements of Part 60 Subpart OOOO. Each natural gas-driven pneumatic

¹ "Ancillary Equipment" means the same as defined in 40 CFR Part 63, Subpart HH. The Subpart HH definition is being used for this permit but note that the equipment leak standards found in Subpart HH do not apply for this permit because this permit is for an "area source" and the equipment leak standards do not apply to area sources.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>(a) and (d)(2), this emissions unit is a natural gas well affected facility and contains natural gas-driven pneumatic controllers designed to have a natural gas bleed rate greater than 6 standard cubic feet per hour, constructed, modified, or reconstructed after 8/23/11 and located between an oil or natural gas production wellhead and the point of custody transfer to the natural gas pipeline.</p>	<p>controller designed and operated to have a bleed rate less than or equal to 6 standard cubic feet per hour (scf/hr) and maintained in accordance with the manufacturer's instructions, shall not be considered an affected facility, subject to Part 60 Subpart OOOO.</p> <p>Each pneumatic controller constructed, modified, or reconstructed on or after 10/15/13, located between the wellhead and a natural gas processing plant, and designed to have a bleed rate equal to or greater than 6 scf/hr is an affected facility subject to the requirements of Part 60 Subpart OOOO.</p> <p>See c)(1) below.</p>

(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 is less than 10 tons/yr.
- c. The permittee shall begin using the Control Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Control. Plan. The permittee cannot begin using any modified Control Plan until such time as the Southeast District Office approves the revised plan.



c) Operational Restrictions

(1) Pneumatic Controller Restrictions

The permittee shall comply with the applicable pneumatic controller operating restrictions of 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5410(d)(1), 60.5390(c)(1), 60.5390(d), 60.5390(e), and 60.5415(d)(1)	Design and operate pneumatic controllers installed, modified, or reconstructed on or after 10/15/13 with a bleed rate less than or equal to 6 scf/hr unless functional needs demand higher bleed rate.
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(2) Ancillary Equipment Leak Detection and Repair Program

The permittee shall develop and implement a work practice plan designed to monitor and repair leaks from ancillary equipment covered by this permit, including each pump, compressor, pressure relief device, valve, flange/connector, vent, cover, any bypass in the closed vent system, and each storage vessel. This program shall meet the following requirements:

- a. Leaks shall be detected by the use of either a “Forward Looking Infra-Red” (FLIR) camera or an analyzer meeting U.S. EPA Method 21 of 40 CFR Part 60, Appendix A.
- b. An initial monitoring shall be completed within 90 days of startup and quarterly thereafter for a period of four consecutive quarters (1 year).
- c. If following the initial four consecutive quarters, less than or equal to 2.0% of the ancillary equipment are determined to be leaking during the most recent quarterly monitoring event, then the frequency of monitoring can be reduced to semi-annual.
- d. If following two consecutive semi-annual periods, less than 2.0% of the ancillary equipment are determined to be leaking during the most recent semi-annual monitoring event, then the frequency of the monitoring can be reduced to annual.
- e. If more than or equal to 2.0% of the ancillary equipment are determined to be leaking during any one of the semi-annual or annual monitoring events, then the frequency of monitoring shall be returned to quarterly.

In addition, the permittee shall adapt the following sections from 40 CFR Part 60, Subpart OOOO to the ancillary leak detection and repair program:

60.5416(c)(4)(i)	Make a first attempt at repair no later than 5 calendar days after leak is detected in the cover, closed vent system, process
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	equipment, or control device
60.5416(c)(4)(ii)	Repair shall be completed no later than 30 calendar days after leak is detected
60.5416(c)(4)(iii)	Use grease or other applicable substance on deteriorating or cracked gaskets while awaiting repair
60.5416(c)(5)	Delay of repair of a leak or defect shall meet the requirements of 40 CFR 60.5416(c)(5)
60.5416(6) and (7)	Unsafe and difficult to inspect procedures

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall develop and implement a site-specific work practice plan designed to monitor and repair or eliminate equipment leaks. This work practice plan shall include, at a minimum, the leak detection and repair monitoring and recordkeeping requirements in d)(2) or d)(3) below.
- (2) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing FLIR Cameras
 - a. Leaks shall be determined by visually observing each ancillary component through the FLIR camera to determine if leaks are visible.
 - b. The following information shall be recorded during each leak inspection:
 - 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;
 - iv. the date the first attempt to repair the component was made;
 - v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);
 - vi. the date the component was repaired and determined to no longer be leaking;
 - vii. the total number of components that are leaking; and
 - viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total



number of ancillary components capable of developing a leak, and multiplied by 100.

- c. The permittee shall maintain records that demonstrate the FLIR camera is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.
- d. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

(3) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing a Method 21 Analyzer

- a. Leaks shall be measured by utilizing U.S. EPA Method 21 (40 CFR Part 60, Appendix A). All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm or 10,000 ppm (as applicable) for determining compliance.

- b. A component is considered to be leaking if the instrument reading is equal to or greater than:

pressure relief device in gas/vapor service	10,000 ppm
pressure relief device in light liquid service	10,000 ppm
pumps in light liquid service	10,000 ppm
compressor	500 ppm
sampling connection system*	*
open ended valves or lines**	**
valves in gas/vapor and light liquid service	10,000 ppm
closed vent system	500 ppm
connectors	10,000 ppm
all other ancillary and associated equipment in VOC service	10,000 ppm

* must be equipped with a closed-purge, closed-loop, or closed-vent system

** must be equipped with a cap, blind flange, plug, or a second valve

- c. The following information shall be recorded during each leak inspection:
 - 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 (company ID and component type (flange, pump, etc.);
 - iv. the date the first attempt to repair the component was made;
 - v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);
 - vi. the date the component was repaired and determined to no longer be leaking;
 - vii. the total number of components that are leaking; and
 - viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.
- d. The permittee shall maintain records that demonstrate the Method 21 analyzer is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.
- e. In order to calibrate the analyzer, the following calibration gases shall be used:
- i. zero air, which consists of less than 10 ppm of hydrocarbon in air; and
 - ii. a mixture of air and methane or n-hexane at a concentration of approximately, but less than, 10,000 ppm of methane or n-hexane.
- f. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

(4) Pneumatic Controller Monitoring and Record Keeping

The permittee shall comply with the applicable pneumatic controller monitoring and recordkeeping restrictions of 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5390(c) and (f), 60.5410(d), 60.5410(d)(3) , 60.5420(c)(4) and 60.5365(d)	Once a pneumatic controller is no longer subject to Subpart OOOO, (its bleed rate is 6 scf/hr or lower), records demonstrating compliance or exemption from the requirements of Part 60 Subpart OOOO must be maintained until the well site is closed.
60.5390(c)(a)(2)	Tag each affected facility pneumatic controller with the month and year of installation, reconstruction, or modification and with information that can identify or trace the records for the manufacturer's design



	specifications.
60.5420(c)(4)(i)	Keep records of the date, location and manufacturer specifications for each pneumatic controller constructed, modified or reconstructed
60.5420(c)(4)(ii)	Keep records of which pneumatic controllers are operating with a bleed rate over 6 scfh and the reasons why
60.5420(4)(iii)	Keep records of manufacturer's specifications indicating that the pneumatic controller(s) is designed such that natural gas bleed rate is less than or equal to 6 scfh
60.5420(4)(v)	Keep records of deviations in cases where the pneumatic controller was not operated on compliance with 60.5390
60.5410(d)(1)	In order to demonstrate initial compliance, upon initial startup, Maintain records per 60.5420(c)(4)(ii) for pneumatic controllers with a bleed rate greater than 6 scfh
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60.5410(d)(1)	In order to demonstrate initial compliance, upon initial startup, Maintain records per 60.5420(c)(4)(ii) for pneumatic controllers with a bleed rate greater than 6 scfh
60.5410(d)(4) and 60.5390(c)(2)	Tag each new Pneumatic controller per 60.5390(c)(2)
60.5416(c)	Inspection and recordkeeping

- (5) The permittee shall maintain records of the following information:
- a. The records required to be collected under the Work Practice Plan, and
 - b. the date and reason any element of the Work Practice Plan was not implemented.



e) Reporting Requirements

(1) 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

(2) The permittee shall include reporting in the site-specific work practice plan for the detection and repair of equipment leaks. This work practice plan shall include, at a minimum, the following leak detection and repair reporting elements in e)(3) below.

(3) Supplement to the PER for the Ancillary Equipment Leak Detection and Repair Program
 For each inspection that occurred during the year, the permittee shall submit the following information with the annual PER from data collected by the ancillary equipment leak detection and repair program:

- a. the date of the inspection;
- b. the number of components determined to be leaking;
- c. the company ID and component type (flange, pump, etc.) of each leaking component;
- d. the total number of components at the site;
- e. the percent of components determined to be leaking;
- f. a list of all components that have not been repaired due to a delay of repair and the reason for the delay; and
- g. a notification indicating if the permittee has changed future inspection frequencies based on the percent of components leaking.

(4) Pneumatic Controller Reporting

The permittee shall comply with the applicable reporting restrictions applicable to pneumatic controls of 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5410(d)(5), 60.5420(b) and 60.5415(d)(2)	Initial annual report due within 90 days of end of initial reporting period per 60.5410; subsequent annual report due on the same date in subsequent years as initial report; reports must contain information listed in 60.5420(b)(1)(i) – 40 60.5420(b)(1)(iv)
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60.5410(d)(5)	To demonstrate initial compliance, report in the initial annual report, if applicable, documentation of each pneumatic controller with a natural gas bleed rate greater than 6 scfh and justification for the controller.
60.5410(d)(5)	To demonstrate initial compliance, report in the initial annual report each pneumatic controller that emits less than 6 scfh
60.5420(b)(5)	Report, if applicable, each pneumatic controller constructed, modified or reconstructed during the reporting period, with information specified in 60.5390(c)(2); documentation of each pneumatic controller with a natural gas bleed rate greater than 6 scfh and justification for the controller; and/or deviations of 60.5390
60.5415(h)	Affirmative defense for violations of emission standards during malfunction

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. Emissions Limitation:

Each natural gas-driven pneumatic shall be operated with a bleed rate less than or equal to 6 scf/hr, unless it can be demonstrated that the pneumatic controller needs to have a higher bleed rate based on functional needs.

Applicable Compliance Method:

Natural gas shall be used as a surrogate for VOC. If required, the detection of leaks of natural gas into the ambient air from the pneumatic controller(s) may be determined using Method 21 from 40 CFR 60 Appendix A; however, compliance is demonstrated through maintaining the manufacturer's design specifications, showing that the controller is designed to operate with a bleed rate less than 6 scf/hr. If required, Method 21 may be used during inspections of the facility.

(2) The permittee shall comply with the applicable testing restrictions applicable to pneumatic controls of 40 CFR Part 60, Subpart OOOO, including the following sections:



60.5410(d)(1), (d)(3), (d)(4), and (d)(5)	Initial compliance with emissions standards shall be demonstrated by recordkeeping as specified in 60.5320(c)(4)(ii); by the manufacturer's design specifications that indicate the controller emits less than or equal to 6 scfh of gas; tagging the pneumatic controller according to the requirements of 60.5390(c)(2); and proper reporting of pneumatic controllers per 60.5410(d)(5)
60.5415(d)(1)-(d)(3)	Continued compliance will be demonstrated by continuously operating the pneumatic controller as required in 60.5390, submitting annual reports as required in 60.5420(b) and recordkeeping per 60.5420(c)(4)

g) Miscellaneous Requirements

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



2. F002, Unpaved Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Unpaved Roadways and Parking Areas with a maximum of 120,000 Vehicle miles traveled per 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	Develop and implement a site-specific work practice plan designed as described in d)(1) below to minimize or eliminate fugitive dust emissions. See b)(2)a. and b)(2)e. below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-17-07(B)	See b)(2)c. below.
d.	OAC rule 3745-17-08(B)	See b)(2)d. 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 particulate emissions from this air contaminant source since the uncontrolled potential to emit for particulate emissions is less than 10 tons/yr.

- c. This emissions unit is exempt from the visible emissions limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- e. The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the appropriate District Office or local air agency (DO/LAA) for review and approval. The permittee cannot begin using any modified Work Practice Plan until such time as the Southeast District Office approves the revised plan.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittee's paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:
 - a. An identification of each segment of unpaved roadway or parking area for which the plan applies.



- b. A determination of the frequency that each roadway or parking area will be inspected to determine if additional control measures are needed.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
 - i. Roadway or parking area segment inspected;
 - ii. Date inspected;
 - iii. Name of employee who either did the inspection or who can verify that the inspection was completed;
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee who either treated the segment or who can verify that the segment was treated; and
 - viii. Method used to treat the segment.
- (2) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. 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 records required to be collected under the Work Practice Plan, and
 - b. the date and reason any element of the Work Practice Plan was not implemented.
- e) Reporting Requirements
 - (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the appropriate DO/LAA.
 - (2) 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.



- (3) 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) None.

- g) Miscellaneous Requirements
 - (1) None.



3. T001 Condensate/Produced Water Storage Tanks and Truck Loading

Operations, Property and/or Equipment Description:

24 - 400 barrel fixed roof tanks, to store condensate/oil/water generated from six wells with the tank emissions controlled by two 9,145 scfh (11.66 mmBTU/hr) enclosed flares. Each flare is permitted with the flare pilot gas burning 8,760 hours/yr with a maximum hourly input capability of 1.89 mmBTU/hr; the inherent limitation of flash tank off-gasses from a total throughput of 18,396,000 gallons per year as indicated in application A0049933. The flares and the liquid loading have a design capture efficiency of at least 98.7% for vapor balancing of liquid loading and a design control efficiency of at least 95% for VOC emissions. The liquid storage tank loading is a splash filling operation, while the liquid loading into the truck tanks operates using a vapor balance system and submerged filling.

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. 3.b)(1)b.

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 flare and capture system with a design capture efficiency of at least 98.7% for vapor balancing of liquid loading and a design control efficiency of at least 95% for volatile organic compound (VOC) emissions.
b.	40 CFR 60, Subpart OOOO (60.5360-60.5430) [In accordance with 60.5365(e), this emissions unit constitutes a storage	Each tank at this facility has a potential to emit after control of less than six TPY and are therefore exempt from the requirements of 40 CFR Part 60, Subpart OOOO.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	vessel that is located at an affected crude oil and natural gas production facility.]	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 six TPY 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. None.

c) Operational Restrictions

- (1) The permittee shall install and operate the tanks with 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 flare is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the flare 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 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.

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 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:

Install a flare and capture system with a design capture efficiency of 98.7% for vapor balancing of liquid loading and a design control efficiency of at least 95% for VOC emissions.



Applicable Compliance Method:

Compliance is demonstrated by the manufacturer's guaranteed specifications for the flare control efficiency of at least 93.8%.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's 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 permittees to apply for and obtain a new or modified permit to install 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 or PTIO.