



1/15/2015

Tim Check
Kilgore Compressor Station-Utica Gas Services, LLC
7235 Whipple Avenue, NW
North Canton, OH 44720

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0210002039
Permit Number: P0118052
Permit Type: OAC Chapter 3745-31 Modification
County: Carroll

Certified Mail

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

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614)644-3469.

Sincerely,



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

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



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

Kilgore Compressor Station-Utica Gas Services, LLC

Facility ID: 0210002039
Permit Number: P0118052
Permit Type: OAC Chapter 3745-31 Modification
Issued: 1/15/2015
Effective: 1/15/2015



Division of Air Pollution Control
Permit-to-Install
for
Kilgore Compressor Station-Utica Gas Services, LLC

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. P015, Flare 2	14
2. P016, Flare 3	18
3. P017, Compressor Blowdowns	22
4. P801, Equipment Leaks	24
5. Emissions Unit Group - Dehydration Units: P024, P025, P026, P027: 110 MMSCFD, residual flash gas emissions controlled by flare 2; condenser vent stream emissions controlled by flare 3.....	29



Authorization

Facility ID: 0210002039
Facility Description: 3335 Amsterdam Rd. SE Scio, OH 43988
Application Number(s): A0052154
Permit Number: P0118052
Permit Description: Chapter 31 modification to increase emissions limitations for the Standard Flare 2, Enclosed Flare, Compressor Blowdowns, Dehydration Units and Equipment Leaks
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$4,800.00
Issue Date: 1/15/2015
Effective Date: 1/15/2015

This document constitutes issuance to:

Kilgore Compressor Station-Utica Gas Services, LLC
Pontiff Rd
Kilgore, OH 43988

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

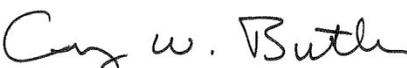
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0118052
 Permit Description: Chapter 31 modification to increase emissions limitations for the Standard Flare 2, Enclosed Flare, Compressor Blowdowns, Dehydration Units and Equipment Leaks

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

- | | |
|-----------------------------------|----------------------|
| Emissions Unit ID: | P015 |
| Company Equipment ID: | Flare #2 |
| Superseded Permit Number: | P0114925 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P016 |
| Company Equipment ID: | Flare #3 |
| Superseded Permit Number: | P0114925 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P017 |
| Company Equipment ID: | Compressor Blowdowns |
| Superseded Permit Number: | P0114925 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P801 |
| Company Equipment ID: | Equipment Leaks |
| Superseded Permit Number: | P0114925 |
| General Permit Category and Type: | Not Applicable |

Group Name: Dehydration Units

Emissions Unit ID:	P024
Company Equipment ID:	P024
Superseded Permit Number:	P0114925
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	P025
Superseded Permit Number:	P0114925
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	P026
Superseded Permit Number:	P0114925
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	P027
Superseded Permit Number:	P0114925
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Kilgore Compressor Station-Utica Gas Services, LLC
Permit Number: P0118052
Facility ID: 0210002039
Effective Date: 1/15/2015

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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



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

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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



8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



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

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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



13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Final Permit-to-Install
Kilgore Compressor Station-Utica Gas Services, LLC
Permit Number: P0118052
Facility ID: 0210002039
Effective Date: 1/15/2015

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The reciprocating compressors, storage vessels, and pneumatic controllers (as defined in 60.5365 and 60.5430) located at this facility are subject to 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution. The complete New Source Performance Standards (NSPS) requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.
3. Air contaminant sources that qualify as de minimis under OAC rule 3745-15-05, or are exempt under OAC rule 3745-31-03(A)(1) or (4) are not subject to emission standards established within this permit. Although this permit does not apply to de minimis or exempt sources, emissions from de minimis or exempt sources must be included in the total potential to emit (PTE) calculations for this permit.



C. Emissions Unit Terms and Conditions



1. P015, Flare 2

Operations, Property and/or Equipment Description:

Standard flare to control dehydration unit flash tanks, condensate stabilizer stream whenever the flash gas compressors are down, and residual flash gas from glycol reboilers (B001-B004).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Nitrogen oxides (NO _x) emissions shall not exceed 0.28 ton per month averaged over a 12-month rolling period. See b)(2)a
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	ORC 3704.03(T)	Carbon monoxide (CO) emissions shall not exceed 1.51 tons per month averaged over a 12-month rolling period. See c(1) and c)(2).
e.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approved OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) as part of the Ohio SIP:

The 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/year (tpy).



- c. The emissions from the flare are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The uncontrolled mass rate of PE from the flare is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.
- (2) The flare shall be designed and operated as follows:
 - a. The flare shall be operated with a minimum destruction efficiency of 98%.
 - b. The flare shall be operated at all times when emissions may be vented to it.
 - c. A flame detection device shall be maintained at all times on the flare to detect the need for a flame.
 - d. The device to monitor the flare for the presence of a flame shall be in operation at all times.
 - e. There shall be no visible particulate emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a flame detection device to monitor the presence of a flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (2) The permittee shall record the following information each day for the flare and process operations:
 - a. all periods during which the flame detection device was not functioning properly; and
 - b. the operating times for the flare and monitoring equipment.
- (3) Each day a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the operational restrictions in c)(2).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
NO_x emissions shall not exceed 0.28 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

The monthly emission rate specified above was established by the following equation:

$$ER_m = \{ [(EF_{\text{flare stream}} \times BV_{\text{flare stream}}) + (EF_{\text{pilot}} \times FR_{\text{pilot}})] / 2,000 \text{ lbs/ton} \} / 12 \text{ months/year}$$

where:

ER_m = monthly emission rate (ton/month);

EF_{flare stream} = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.068 lb/mmBtu);

BV_{flare stream} = maximum Btu value of flare stream gas (97,523mmBtu/yr);

EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (100 lbs/10⁶scf); and

FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

If required, compliance with the hourly NO_x emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

- b. Emission Limitation:
CO emissions shall not exceed 1.51 tons/month averaged over a 12-month rolling period.



Applicable Compliance Method:

The monthly emission rate specified above was established by the following equation:

$$ER_m = \{[(EF_{\text{flare stream}} \times BV_{\text{flare stream}}) + (EF_{\text{pilot}} \times FR_{\text{pilot}})] / 2,000 \text{ lbs/ton}\} / 12 \text{ months/year}$$

where:

ER_a = monthly emission rate (ton/mon);

$EF_{\text{flare stream}}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.37lb/mmBtu);

$BV_{\text{flare stream}}$ = maximum Btu value of flare stream gas (97,523mmBtu/yr);

EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (84lbs/10⁶scf); and

FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

If required, compliance with the CO emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

c. Emission Limitation:

There shall be no visible particulate emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

Compliance with the visible particulate emissions limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

d. Emission Limitation:

The flare shall be operated with a minimum destruction efficiency of 98%.

Applicable Compliance Method:

If the flare complies with the control requirements specified in c)(2) compliance with the 98% control efficiency requirement shall be assumed.

g) Miscellaneous Requirements

- (1) None.



2. P016, Flare 3

Operations, Property and/or Equipment Description:

Enclosed flare to control emissions from dehydration unit (P024-P027) condenser vent streams.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	NO _x emissions shall not exceed 0.09 ton/month averaged over a 12-month rolling period. CO emissions shall not exceed 0.50 ton/month averaged over a 12-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(ii)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approved OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) as part of the Ohio SIP:

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

c. The emissions from the flare are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.



- d. The uncontrolled mass rate of PE from the flare is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero.
- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas in this emissions unit.
 - (2) The flare shall be designed and operated as follows:
 - a. The flare shall be operated with a minimum destruction efficiency of 98%.
 - b. The flare shall be operated at all times when emissions may be vented to it.
 - c. A flame detection device shall be maintained at all times on the flare to detect the need for a flame.
 - d. The device to monitor the flare for the presence of a flame shall be in operation at all times.
 - e. There shall be no visible particulate emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate, and maintain a flame detection device to monitor the presence of a flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
 - (2) The permittee shall record the following information each day for the flare and process operations:
 - a. all periods during which the flame detection device was not functioning properly; and
 - b. the operating times for the flare and monitoring equipment.
 - (3) Each day a fuel other than natural gas is burned in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- e) Reporting Requirements
 - (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the operational restrictions in c)(2).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Emission Limitation:

NO_x emissions shall not exceed 0.09 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

The monthly emission rate specified above was established by the following equation:

$$ER_m = \{ [(EF_{\text{flare stream}} \times BV_{\text{flare stream}}) + (EF_{\text{pilot}} \times FR_{\text{pilot}})] / 2,000 \text{ lbs/ton} \} / 12 \text{ months/year}$$

where:

ER_m = monthly emission rate (tons/month);

EF_{flare stream} = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.068 lb/mmBtu);

BV_{flare stream} = maximum Btu value of flare stream gas (32,495 mmBtu/yr);

EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (84 lbs/10⁶ scf); and

FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

If required, compliance with the hourly NO_x emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

b. Emission Limitation:

CO emissions shall not exceed 0.50 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

The monthly emission rate specified above was established by the following equation:

$$ER_m = \{ [(EF_{\text{flare stream}} \times BV_{\text{flare stream}}) + (EF_{\text{pilot}} \times FR_{\text{pilot}})] / 2,000 \text{ lbs/ton} \} / 12 \text{ months/year}$$



where:

ER_m = monthly emission rate (ton/month);

$EF_{\text{flare stream}}$ = emission factor from AP-42, Table 13.5-1 (revised 1/95) for the flare stream portion (0.37 lb/mmBtu);

$BV_{\text{flare stream}}$ = maximum Btu value of flare stream gas (32,495mmBtu/yr);

EF_{pilot} = emission factor from AP-42, Table 1.4-1 (7/98) for the pilot gas portion (84lbs/10⁶scf); and

FR_{pilot} = maximum annual flow rate of pilot gas (0.6132 mmscf/yr).

If required, compliance with the CO emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

c. Emission Limitation:

There shall be no visible particulate emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

Compliance with the visible particulate emissions limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

d. Emission Limitation:

The flare shall be operated with a minimum destruction efficiency of 98%.

Applicable Compliance Method:

If the flare complies with the control requirements specified in c)(2) compliance with the 98% control efficiency requirement shall be assumed.

g) Miscellaneous Requirements

(1) None.



3. P017, Compressor Blowdowns

Operations, Property and/or Equipment Description:

Process releases associated with periodic blowdown activities

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile Organic Compound (VOC) emissions shall not exceed 2.32 tons/month averaged over a 12-month rolling period.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall minimize the frequency and size of blow-down events by conducting routine operation and maintenance activities in a manner consistent with safety and good air pollution control practices.

d) Monitoring and/or Recordkeeping Requirements

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

- a. number of compressor blowdown events;
- b. mole % of each VOC component in the gas stream using a representative analysis;
- c. the volume of gas emitted from all compressor blowdown events for each month, in scf; and
- d. the rolling, 12-month summation of the volume of gas emitted from all compressor blowdown events, in scf.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit annual reports that identify:
 - a. the rolling, 12-month summation of VOC emissions, as calculated in f)(1)a; and
 - b. the annual volume of natural gas released from this emissions unit.

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

- a. Emission Limitation:

VOC emissions shall not exceed 2.32 tons/month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be based upon the following calculation using the inputs provided in the permittee's application and the recordkeeping requirements in d)(1):

$$\text{VOC (tons/month)} = \text{sum of the following for each VOC component:} \\ = [\text{MW} \times (\text{V} \times \text{M}\%) / \text{C}] \times (1 \text{ ton}/2,000 \text{ pounds})$$

where:

MW = molecular weight constant, in lb/lb-mole;

V = volume of gas emitted/month from records specified in d)(1)c, in scf;

M% = mole % of each VOC component/month from analysis in d)(1)b, in %; and

C = molar volume conversion, 379.4 scf/lb-mole, at 60° F and 1 atm.

g) Miscellaneous Requirements

- (1) None.



4. P801, Equipment Leaks

Operations, Property and/or Equipment Description:

Various equipment components, including valves, pumps, flanges, and connectors located throughout facility

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Fugitive VOC emissions shall not exceed 2.16 tons/month averaged over a 12-month rolling period.

(2) Additional Terms and Conditions

a. None

c) Operational Restrictions

(1) Ancillary Equipment Leak Detection and Repair Program

The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment covered by this permit, including each pump, compressor, pressure relief device, connector, valve, flange, 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.
- f. The program shall require the first attempt at repair within five (5) calendar days of determining a leak.
- g. The program shall require that the leaking component is repaired within 30 calendar days after the leak is detected.
- h. The program shall allow for the delayed repair of a leaking component following the language found in 40 CFR 60.5416(c)(5).
- i. The program shall follow the Monitoring and Record Keeping requirements described in paragraph 5.d) of this permit.

- (2) In the event that a leak or defect is detected in the cover, closed vent system, process equipment, or control device, the permittee shall make a first attempt at repair no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 30 calendar days after the leak is detected as allowed in 40 CFR 60.5416(c)(4). Any delay of repair of a leak or defect shall meet the requirements of 40 CFR 60.5416(c)(5).

d) Monitoring and/or Recordkeeping Requirements

- (1) Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing FLIR Camera's
 - 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.
- (2) 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 seals	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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) For each inspection that occurred during the year, the permittee shall submit the following information annually 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.

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. Emission Limitations:
 Fugitive VOC emissions shall not exceed 2.16 tons/month averaged over a 12-month rolling period.

Applicable Compliance Method:

This emission limitation is based on the potential to emit. Emission factors from U.S. EPA's "Protocol for Equipment Leak Emission Estimates", Table 2-4, for Oil and Gas production Operations (a conservative estimate), shall be used to demonstrate compliance with the limit. The monthly emissions from ancillary and associated equipment shall be documented from the summation of the calculations listed below, multiplied by (8,760 hours/year), the conversion factor (1 ton/2,000 pounds) and divided by (12 months/year).

$$\text{Component Type (\# of components)} \times \text{emission factor} \times \% \text{ VOC}^* = \text{lb/hr}$$

In Gas/Vapor Service

- Number of connectors (1,444) x 0.000441 lb/hr x % VOC = lb/hr
 - Number of valves (831) x 0.00992 lb/hr x % VOC = lb/hr
 - Number of flanges (741) x 0.00086 lb/hr x % VOC = lb/hr
 - Number of compressor seals (66) x 0.0194 lb/hr x % VOC = lb/hr
 - Number of relief valves (18) x 0.0194 lb/hr x % VOC = lb/hr
 - Number of pump seals (64) x 0.0194 lb/hr x % VOC = lb/hr
- *where: % VOC = 15.8909 per company's analysis

In Light Oil Service

- Number of connectors (1,083) x 0.000463 lb/hr x % VOC = lb/hr
 - Number of valves (406) x 0.00551 lb/hr x % VOC = lb/hr
 - Number of pump seals (31) x 0.0287 lb/hr x % VOC = lb/hr
 - Number of flanges (221) x 0.00086 lb/hr x % VOC = lb/hr
 - Number of other components (5) x 0.0165 lb/hr x % VOC = lb/hr
- *where: % VOC = 100 per company's analysis

g) Miscellaneous Requirements

(1) None.



5. Emissions Unit Group -Dehydration Units: P024, P025, P026, P027: 110 MMSCFD, residual flash gas emissions controlled by flare 2; condenser vent stream emissions controlled by flare 3

EU ID	Operations, Property and/or Equipment Description
P024	Glycol dehydration unit 1: reboiler (B001), condenser and flares 2 and 3
P025	Glycol dehydration unit 2: reboiler (B002), condenser and flares 2 and 3
P026	Glycol dehydration unit 3: reboiler (B003), condenser and flares 2 and 3
P027	Glycol dehydration unit 4: reboiler (B004), condenser and flares 2 and 3

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

(1) d)(4)

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)	VOC emissions from the flare stack(s) for each emissions unit shall not exceed 0.41 ton/month averaged over a 12-month rolling period. See b)(2)a, b)(2)c through b)(2)e, c)(1) and c)(2).
b.	OAC rule 3745-31-05(A)(3)(ii)	See b)(2)b.
c.	40 CFR Part 63, Subpart HH, NESHAP from Oil and Natural Gas Production Facilities, 40 CFR 63.764(e)(1)(ii)	Exempt. Less than 0.90 Megagram benzene/year. See d)(2) and d)(3).
d.	ORC 3704.03(F)(4)(d)	See d)(4).

(2) Additional Terms and Conditions

a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approved OAC rule 3745-31-05(A)(3)(a)(ii) (the less than 10 tpy BAT exemption) as part of the Ohio SIP:



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

- c. Dehydrator flash tank off-gases that are not used as fuel in the reboiler shall be recompressed and routed to the inlet separator. During flash gas compressor downtime, flash tank off-gases will be routed to Flare-2 (P015).
- d. Maintenance of the temperature of the exhaust gases from the condenser and maintenance of the flare used to control VOC and HAPs will assure compliance with the annual limit. Additional monthly record keeping is not required since the annual limits are based on each emissions unit's potential to emit (at a throughput of 110mmscf of natural gas/day and 98% destruction efficiency). See emissions units P015 and P016 for flare requirements.
- e. The emissions from the dehydration unit's condenser shall be vented to the flare at all times the emissions unit is in operation. The flare shall have a minimum destruction efficiency of 98%. See emissions units P015 and P016 for flare requirements.

c) Operational Restrictions

- (1) All emissions from the dehydrator still vent shall be vented to a condenser that shall meet the monitoring and record keeping requirements of this permit, when the emissions unit is in operation, including the following:
 - a. The condenser shall be operated at all times when gases are vented to it.
 - b. The condenser must be equipped with a temperature monitoring device that monitors and records the dehydration still vent temperature.
 - c. The condenser, temperature monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
- (2) The condenser temperature shall be maintained below 120° Fahrenheit during operation of this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following records for the condenser:
 - a. monitor and record the temperature of the exit of the condenser on a daily basis (Monday through Friday, excluding major holidays); and
 - b. record all periods of time when the condenser is not operating correctly to control the emissions from the dehydration still vent.
- (2) The permittee shall maintain records of the annual facility natural gas or hydrocarbon liquid throughput for each year, in accordance with 40 CFR 63.760(a)(1)(ii).



- (3) The permittee shall maintain the following records for the actual average emissions of benzene from the glycol dehydration unit process vent in accordance with 63.772(b)(2), determined either uncontrolled or with federally enforceable controls in place:
- a. The permittee shall determine actual average benzene emissions using the model GRI-GLY Calc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLY Calc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or
 - b. The permittee shall determine an average mass rate of benzene emissions in kilograms/hour through direct measurement using the methods in 63.772(a)(1)(i) or (ii), or an alternative method according to 63.7(f). Annual emissions in kilograms/year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. This result shall be converted to megagrams/year.
- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", 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/year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton/year may require the permittee to apply for and obtain a new PTI.

*The composition of the gas being processed may vary due to the nature of the industry. The company will sample the gas semiannually to perform a detailed gas analysis in order to determine if the composition has changed such that it will result in an increase in emissions of any toxic air contaminant.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any deviation from the operational restrictions in section c).

These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.



f) Testing Requirements

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

a. Emission Limitations:

VOC emissions from the flare stack(s) for each emissions unit shall not exceed 0.41ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:

The permittee may determine the VOC emissions (excludes methane and ethane) using the GRI-GLYCalc™ model, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit(s) and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” (GRI-95/0368.1);

Potential VOC and/or benzene emissions estimates shall be based on the maximum glycol circulation rate(s), in gallons/minute (gpm); the worst case pollutant concentrations from representative extended gas analyses of the inlet wet gas; and the maximum natural gas flow rate, as determined by 40 CFR 63.772(b)(1)(i); or for a new unit, potential emissions shall be estimated in accordance with 40 CFR 63.760(a) and increased by a factor of 1.2.

See emissions units P015 and P016 for testing requirements.

b. Emission Limitation:

The flare shall have a minimum destruction efficiency of 98%.

Applicable Compliance Method:

Compliance shall be demonstrated by the design and operation specifications detailed in emissions units P015 and P016.

g) Miscellaneous Requirements

(1) The permittee shall meet the applicable requirements of the most current version of 40 CFR Part 63, Subpart HH following any amendments to these rules, which may supersede any requirements identified in this permit.