



2/25/2015

Sean Wilson
Blue Racer Midstream LLC - Carroll Co Field Station #1
5949 Sherry Lane, Suite 1300
Dallas, TX 75225

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0210012030
Permit Number: P0118021
Permit Type: Initial Installation
County: Carroll

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

Certified Mail

Table with 2 columns: Status (No) and Category (TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MODELING SUBMITTED, SYNTHETIC MINOR TO AVOID TITLE V, FEDERALLY ENFORCABLE PTIO (FEPTIO), SYNTHETIC MINOR TO AVOID MAJOR GHG)

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)963-1200 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: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for**

Blue Racer Midstream LLC - Carroll Co Field Station #1

Facility ID:	0210012030
Permit Number:	P0118021
Permit Type:	Initial Installation
Issued:	2/25/2015
Effective:	2/25/2015
Expiration:	3/14/2024



**Division of Air Pollution Control
Permit-to-Install and Operate
for**

Blue Racer Midstream LLC - Carroll Co Field Station #1

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Authorization

Facility ID: 0210012030
Application Number(s): A0052082, A0052625, A0052716
Permit Number: P0118021
Permit Description: Initial installation permit for a pressurized condensate tank and associated truck loading at a compressor station which were previously installed.
Permit Type: Initial Installation
Permit Fee: \$350.00
Issue Date: 2/25/2015
Effective Date: 2/25/2015
Expiration Date: 3/14/2024
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Blue Racer Midstream LLC - Carroll Co Field Station #1
Cobbler Rd NE
Carrollton, OH 44615

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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: P0118021

Permit Description: Initial installation permit for a pressurized condensate tank and associated truck loading at a compressor station which were previously installed.

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

Emissions Unit ID:	J002
Company Equipment ID:	J002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T003
Company Equipment ID:	T003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Blue Racer Midstream LLC - Carroll Co Field Station #1
Permit Number: P0118021
Facility ID: 0210012030
Effective Date: 2/25/2015

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
Blue Racer Midstream LLC - Carroll Co Field Station #1
Permit Number: P0118021
Facility ID: 0210012030
Effective Date: 2/25/2015

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. The permittee shall implement the ambient monitoring plan attached hereto, as submitted to Ohio EPA on February 18, 2015 (ORC 3704.03(I)).
3. The permittee shall submit the following items within 30 days after the initial restart of the facility since the January 2015 shutdown:
 - a) A "Third-Party Validation Analysis of the Facility" , which should: 1) evaluate current design and operation of the compressor station to ensure proper monitoring and control systems are in place; 2) consider the appropriateness of the Preventive Maintenance and Malfunction Abatement Plan described in B.3.b) and recommend any updates, and; 3) assess operating parameters for all emissions units at the facility, source monitoring for all emissions units at the facility, and all emissions control systems currently in place at the facility.
 - b) A "Preventive Maintenance and Malfunction Abatement Plan" as detailed in OAC 3745-15-06(D) to prevent, detect, and correct malfunctions or equipment failures for each emission unit.
 - c) An "Internal Review Procedures" plan that will ensure operational changes at the facility will be evaluated and approved in advance by environmental and engineering staff in the permittee's organization.
4. The permittee shall not operate any condensate or produced water tank other than T003 until permits are applied for and obtained.



Final Permit-to-Install and Operate
Blue Racer Midstream LLC - Carroll Co Field Station #1
Permit Number: P0118021
Facility ID: 0210012030
Effective Date: 2/25/2015

C. Emissions Unit Terms and Conditions



1. J002, J002

Operations, Property and/or Equipment Description:

Pressurized Condensate Truck Loading

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Fugitive volatile organic compound (VOC) emissions shall not exceed 0.002 ton per month averaged over a 12-month rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	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 potential to emit is less than 10 tons per year. See b)(2)b.



- (2) Additional Terms and Conditions
 - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
 - (1) Tank Truck Unloading Operations
 - a. Prior to connecting the condensate transfer line(s) from the condensate tank to the condensate tank truck, the permittee shall inspect all fittings, valves, gaskets and fasteners that will be used during the transfer to ensure they are in proper condition (i.e., not corroded, torn, worn, stripped or otherwise damaged) and will result in vapor tight connections.
 - b. During the loading of condensate from the condensate tank to the condensate tank truck, the permittee shall continually monitor the transfer equipment, the condensate tank and the tank truck for any leaks through visual, olfactory, or other observations. If any leak is detected, loading of the condensate shall cease until the leaking component has been repaired.
 - c. The permittee shall not permit condensate to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following information:
 - a. the number of condensate line disconnects for each month;
 - b. the rolling, 12-month summation of the number of condensate line disconnects; and
 - c. for condensate transfer operations, the permittee shall maintain a record of the following information:
 - i. the date any leak was detected;
 - ii. the findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;
 - iii. the leak detection method;



- iv. the corrective action(s) taken to repair each leak and the date of final repair; and
- v. the inspector's name and signature.

These records shall be retained for a period of five years from the date the record was created.

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. The PER shall include a summary of the VOC emissions, in tons per month, averaged over a 12-month rolling period.
- (3) The permittee shall submit quarterly summaries of the monthly condensate line disconnects and leak inspection records required in d)(1).

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequency for quarterly reporting if operating experience indicates that less frequent reporting would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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:

Fugitive VOC emissions shall not exceed 0.002 ton per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

Compliance with the monthly allowable VOC emission limitation above shall be demonstrated by the following calculation based on the emissions factors in the



permittee's application and the most recent representative analysis of the gas composition:

$$\text{Fugitive VOC} = \frac{[(VP) \times (V) \times (MW) \times (\# \text{ of disconnects/yr}) \times (\% \text{ VOC}/100)]}{[(T) \times (GC)] \times (1 \text{ ton}/2,000 \text{ lbs}) \times (1 \text{ year}/12 \text{ months})}$$

Where:

VP = vapor pressure of condensate, in psia;

V = volume of condensate, in ft³;

MW = molecular weight of condensate, in lb/mole;

of disconnects/yr = # of disconnects per (d)(1);

% VOC = as determined by the most recent representative analysis;

T = temperature of condensate, in degrees R; and

GC = gas constant, in ft³ x psia/lb-mol x deg R.

If required, the permittee shall perform test(s) to determine the reduction efficiency of a vapor control system. These tests may include methods described in 40 CFR (Code of Federal Regulations) 63.11120 or another method approved by the Ohio EPA Northeast District Office.

g) Miscellaneous Requirements

- (1) None.



2. T003, T003

Operations, Property and/or Equipment Description:

Pressurized Condensate Bullet Tank

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Install a vapor recovery unit (VRU) with 100% design control efficiency (leaks from ancillary equipment (in order to be consistent with language used in referenced section) are monitored under emissions unit P801). See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(ii) June 30, 2008	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 potential to emit is less than 10 tons per year. See b)(2)b.



- (2) Additional Terms and Conditions
 - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
 - b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
 - (1) The permittee shall vent all emissions from the condensate tank to the VRU at all times. During VRU maintenance, there shall be no emissions from the condensate tank.
 - (2) The permittee shall operate the VRU at all times in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modification deemed necessary by the permittee. In the event of any downtime of the VRU, the VRU shall be repaired and returned to normal operation expeditiously.
 - (3) The permittee shall install and operate a system to automatically close the shut-down valves for both the condensate and produced water (LCV-300B and SDV-300B) from the inlet separator (slug catcher) when the pressure in the condensate tank reaches 40 psig.
 - (4) The permittee shall install and operate a system to automatically shut down the station through an Emergency Shutdown (ESD) when the pressure in the condensate tank reaches 50 psig. During the ESD, there shall be no emissions to the vent stack.
 - (5) The permittee shall install and operate a system to automatically shut down the station through an ESD when the liquid level in the condensate tank reaches 80%. During the ESD, there shall be no emissions to the vent stack.
 - (6) The pressure and liquid level limits in c)(3) through c)(5) are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted pressure and liquid level limits in c)(3) through c)(5) based upon information obtained during future operation. In addition, approved revisions to the pressure and liquid level limits in c)(3) through c)(5) will not constitute a relaxation of the operational restriction requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect a pressurized condensate sample within 30 days of the first restart of the facility since the January 2015 shutdown and perform a detailed gas analysis in order to determine the VOC and hazardous air pollutant (HAP) composition. This sampling shall be repeated on a semiannual basis.



- (2) The permittee shall record the following information on a monthly basis:
 - a. The number of valve shutdowns from the inlet separator that result from the condensate tank pressure reaching the value established in c)(3), including the date and time, duration and reason;
 - b. The number of ESD's that result from the condensate tank pressure reaching the value established in c)(4) and/or the liquid level reaching the value established in c)(5), including the date and time, duration and reason; and
 - c. The number of releases to the vent stack that result from the condensate tank pressure reaching 60 psig. Details of these releases shall be immediately provided to the Ohio EPA per OAC rule 3745-15-06(B).
 - d. The pressure level in d)(2)c. is effective for the duration of this permit, unless a revision is requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request a revision to the pressure level in d)(2)c. based upon information obtained during future operation. In addition, an approved revision to the pressure level in d)(2)c. will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
 - e. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for recording the events in d)(2)a. and b. if operating experience indicates that less frequent records would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (3) The permittee shall properly install, operate, and maintain a continuous pressure monitor and recorder that measure and record the pressure within the condensate tank when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. These records shall be maintained in a weekly summary and maintained for a period of no less than 5 years. These records can be kept electronically, provided they can be made available to the appropriate Ohio EPA District Office or local air agency.
- (4) The permittee shall properly install, operate, and maintain a continuous level monitor and recorder that measure and record the level within the condensate tank when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the level on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. These records shall be maintained in a weekly summary and maintained for a period of no less than 5 years. These records can be kept electronically, provided they can be made available to the appropriate Ohio EPA District Office or local air agency.



- (5) The permittee shall properly install, operate, and maintain a continuous pressure monitor and recorder that measure and record the inlet pressure to the VRU when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. These records shall be maintained in a weekly summary and maintained for a period of no less than 5 years. These records can be kept electronically, provided they can be made available to the appropriate Ohio EPA District Office or local air agency.
- (6) The permittee shall properly install, operate, and maintain a continuous flow monitor and recorder that measure and record the flow to the vent stack when the emissions unit is in operation, including periods of startup and shutdown, within 8 weeks of the first restart of the facility since the January 2015 shutdown. The permittee shall record the flow on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. These records shall be maintained in a weekly summary and maintained for a period of no less than 5 years. These records can be kept electronically, provided they can be made available to the appropriate Ohio EPA District Office or local air agency.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the VRU, 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.
- (8) The permittee shall conduct periodic inspections of the VRU 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.
- (9) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the VRU while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (10) The permittee shall document each inspection (periodic and annual) of the VRU 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 the 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.

- (11) The permittee shall maintain records that document any time periods when the VRU was not in service when the emissions unit(s) was venting to it, as well as a record of all operations during which the VRU 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. The PER shall include a summary of the VOC emissions, in tons per month, averaged over a 12-month rolling period.
- (3) The permittee shall submit quarterly summaries of the following:
- a. The pressurized condensate sample testing results, as required in d)(1);
 - b. The records of the number of valve shutdowns from the inlet separator, the number of ESD's and the number of vent stack releases, along with an estimate of the emissions released during a vent stack release, as required in d)(2);
 - c. The results of periodic inspections of the VRU, as required in d)(8);
 - d. A summary of VRU downtime, as required in d)(11).

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequency for quarterly reporting if operating experience indicates that less frequent reporting would be sufficient to ensure compliance with the above-mentioned applicable requirements.



f) Testing Requirements

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

a. Design Efficiency:

Install a VRU with 100% design control efficiency for VOC emissions from the condensate tank.

Applicable Compliance Method:

Compliance is demonstrated by VRU manufacturer's design efficiency of 100% control for VOC emissions and the record keeping in d).

g) Miscellaneous Requirements

(1) None.

Air Monitoring Plan

for

Blue Racer – Carroll County, Ohio Compressor Station

DRAFT

(TRC Project # 231305.0000.0000)

February 18, 2015

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Table 1: Monitoring Program Parameters..... 5

1. Introduction

The purpose of this Air Monitoring Plan (“AMP”) is to describe an ambient air and meteorological (met) monitoring program consisting of two (2) sampling locations and one met tower located along the fenceline of the Blue Racer Midstream Carroll County, OH Field Station (“CFS1”).

Provided in this AMP are provisions to ensure that accurate method(s) are in place to measure the level of potential air contaminants in the vicinity of CFS1 in such a way as to assess the contribution, if any, of emissions from CFS1.

This Air Monitoring Plan is organized into eight sections as follows: Section 1 is this Introduction; Section 2 presents the objectives of the air quality monitoring program; Section 3 outlines the site selection process, including the modeling undertaken to support site selection; Section 4 describes the monitoring station locations; Sections 5 and 6 outline the air sampling and meteorological monitoring methodologies, respectively; Section 7 presents planned Quality Assurance and Quality Control measures; and Section 8 presents a discussion of data processing, validation and reporting.

2. Objectives

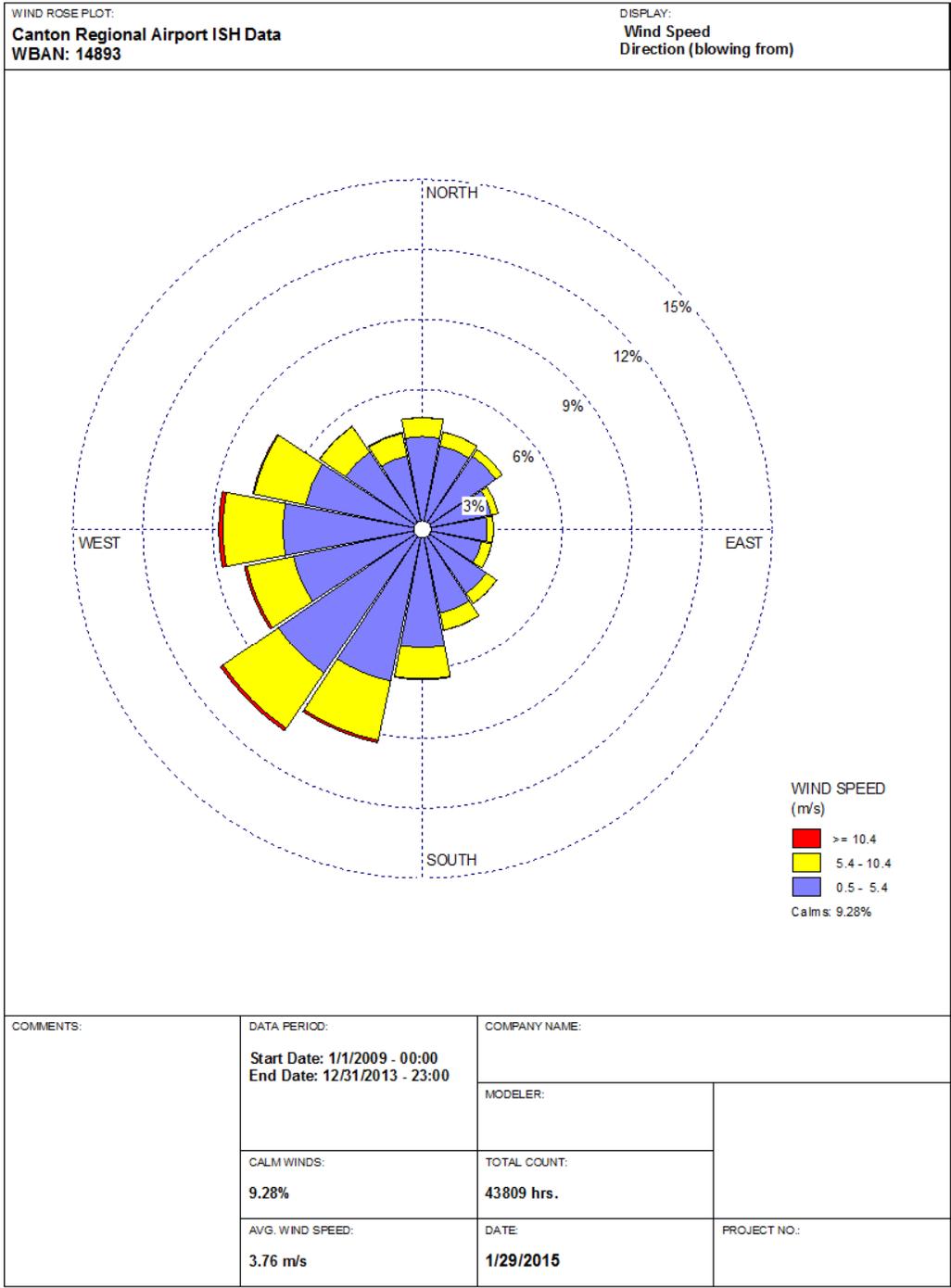
As previously stated, the purpose of this AMP is to describe Blue Racer’s plan to install and operate a fence line ambient air sampling and meteorological monitoring network at CFS1. The AMP has been developed in accordance with applicable or informative regulations and guidelines to provide valid and reliable ambient measurement data.

Monitoring will commence on or about the date of the restart of CFS1 and is expected continue for a minimum of 180 calendar days from such date. Sampling will be initiated the week of February 16th with 24-hour integrated samples to be collected every third day, with the frequency subsequently shifting to every sixth day (see sampling discussion in Section 5.1). Initial integrated samples will be collected from noon to noon until sample collection timers are received, at which time midnight to midnight sampling will occur. Midnight to midnight sampling is expected to begin February 26th. The objective of this monitoring program is to provide data to be used to assess CFS1’s impact, if any, on localized air quality, with emphasis on the nearest residential receptors. This assessment will include a comparison of monitored concentrations to OEPA maximum ambient ground level concentrations (“MAGLC”), as applicable.

Data collected as part of this monitoring program will meet the data quality objectives (“DQOs”) including, but not limited to, precision, accuracy, comparability, and data capture. These DQOs and acceptance criteria, as found in the Quality Assurance Handbook for Air Pollution Measurement Systems Volumes II, are summarized in Section 7.

3. Site Selection Process

The location of monitoring stations is based upon the following: 1) the historical wind patterns and 2) the anticipated concentrations as a function of distance, based on dispersion modeling presented within Blue Racer's Permit to Install and Operate ("PTIO") at CFS1, dated November 2014. For the wind patterns, the nearest airport with reliable data is Akron-Canton Airport, which is 31 miles to the northwest of CFS1. The wind rose for the calendar period 1/1/2009 through 12/31/2013 is presented in Figure 1. These data suggest that upwind is to the southwest or west and downwind is to the northeast or east of CFS1 (Note that the percentage of time that the wind blows to the nearest residential receptor is about 10% of the hours of the year). The maximum concentrations will occur at CFS1's fence line regardless of the actual source of emissions at the site because of the low-level vent release points and the presence of major obstacles to flow. This was confirmed by the modeling provided in the PTIO. Thus monitoring sites at the fence line or just beyond would be appropriate. They could be aligned southwest- northeast, or east-west with the upwind location positioned along the southern fence in order to sample between the neighbor receptor to the south and facility emission points.



WRPLOT View - Lakes Environmental Software

Figure 1: Wind Rose Diagram

4. Number, Type and Location of Sampling Site(s)

4.1. Target Compounds

A list of volatile organic target compounds analyzed for by US EPA Method TO-15 is presented in Table 1, below. This listing includes benzene, toluene, ethylbenzene, xylenes (“BTEX”), and n-hexane.

Table 1: Monitoring Program Parameters

Target Compound	CAS Number
Benzene	71-43-2
Toluene	108-88-3
Ethylbenzene	100-41-4
Xylenes	1330-20-7
n-Hexane	110-54-3

4.2. Sampling Locations

Proposed sampling locations are identified on the site schematic presented in Figure 2. The proposed location for the upwind and downwind sampling sites are along the south fenceline and northeast fenceline, respectively.

The proposed met tower location at the northernmost boundary of the facility is also shown in Figure 2. This location meets EPA siting criteria as it is approximately 500 feet away from the tree line to the south. However, if installing the met tower at this location proves to be impractical due to current site conditions an alternate location will be selected within the facility.

5. Air Sampling Frequency and Methodology

5.1. Sampling Frequency and Duration

For the first 60 days, 24-hour integrated samples for VOCs will be collected once every three days at two sampling locations. For the remaining 120 days, samples will be collected once every six days.

Field blank samples will be collected and analyzed on a routine basis. Field blanks are quality control samples that are used to assess contamination introduced during the sample collection and analysis process. A field blank sample will be collected with the very first sample set and will follow once per month for the duration of the AMP.

5.2. Sampling and Analytical Methods

VOCs will be collected using a 6-liter evacuated stainless steel canister that has been treated internally by the “SUMMA” process, forming an inert pure chrome-nickel oxide internal surface. A calibrated regulator (flow controller with a critical orifice, Parker Variflo SC423XL) will be connected to a Nutech 2701 programmable timer/solenoid valve attached to the inlet of the canister. This assembly will allow for remote collection of a 24-hour integrated samples from midnight to midnight on scheduled sample days. As previously discussed, integrated sample collection will initially take place from noon to noon to accommodate typical work schedules. Programmable timers will be available on or around February 26th, after which samples will be collected from midnight to midnight.

The samples will be subsequently analyzed using EPA Method TO-15 by gas chromatography/mass spectrometry (GC/MS). These VOC samples will provide results that represent a time-weighted average (TWA) result over each 24-hour sampling period

Target parameters consist of those listed in the Table 1, as well as in the laboratory’s Standard Operating Procedure (SOP). The laboratory’s SOP is provided in Appendix A.

6. Meteorological Monitoring

Meteorological parameters to be measured will consist of wind speed and direction as well as standard deviation of wind direction ($\sigma\theta$) at a height of 10 meters (m). Wind speed will be recorded as hourly scalar and vector averages. Wind direction will be recorded as hourly vector and unit vector averages. Standard deviation will be calculated by taking the square root of the average of 4-15 minute variances.

Horizontal wind speed and direction will be determined with an R.M. Young Wind Monitor AQ (model 05305). Meteorological data will be processed, recorded and displayed using a Model 26800 translator. All meteorological data collected from this station will be stored in

a local database on a PC equipped with a solid state drive. Data will be transmitted to TRC's central cloud server location on an hourly basis.

7. Quality Assurance (QA) and Quality Control (QC) Procedures

The AMP is designed to achieve program DQOs and meet or exceed the minimum standard requirements for field monitoring and analytical methods. The overall QA objective is to develop and implement procedures for this program that will provide results that are scientifically valid, and the levels of which are sufficient to meet program DQOs. Specific procedures for field instrument calibrations, reporting of data, internal quality control, preventative maintenance of field equipment, and corrective action, as applicable, will be described in a comprehensive QAPP (if needed). The QAPP will describe, in detail, the necessary QA/QC and other technical activities that must be implemented to ensure that the results of work performed will satisfy the program DQOs. The Monitoring Program QAPP will be implemented prior to commencement of any monitoring and field sampling activities.

TRC will have primary responsibility for implementation of all monitoring program QC measures. The following is a summary of QC activities that will be implemented to ensure that measurement uncertainty is maintained within established acceptance criteria for the attainment of the program DQOs. QC activities will include, but not be limited to, the following:

- SUMMA Canister Samples Collection and Analysis:
 - Field Quality Control Samples – Field Blanks, Collocated samples (once per month)
 - Laboratory Quality Control – Replicate Analysis, Internal Standards, Laboratory Control Samples
- Meteorological Measurements
 - Initial and semi-annual calibrations,
 - Weekly reasonableness checks by site operator
 - Verification that wind sensors are operational and show no sign of damage,
 - Wind speed and wind direction measurements represent actual conditions, and
- Specific Guidance to be followed will include:
 - Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air, Second Edition, Compendium Method TO-15: Determination Of Volatile Organic Compounds (VOCs) In Air Collected In Specially-Prepared Canisters And Analyzed By Chromatography/Mass Spectrometry (GC/MS), EPA/625/R-96/010b
 - Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final)
 - Meteorological Monitoring Guidance for Regulatory Modeling Applications

(EPA-454/R-99-005)

- TRC Standard Operating Procedures

8. Data Processing, Data Validation and Reporting

8.1. Data Processing

Data processing begins with acquisition (electronic and manual) at the monitoring station. TRC will install a computer-based data acquisition system that will record hourly averaged data from the meteorological instrumentation in a local database. This system will be connected to the internet and transfer data to a cloud server on an hourly basis.

Laboratory personnel will verify analytical data (1) at the time of analysis and reporting and (2) through subsequent reviews of the raw data for any nonconformances with the requirements of analytical methods. Laboratory personnel will make a systematic effort to identify any outliers or errors before the data are reported. Outliers identified during data verification will be investigated and corrected; outliers that cannot be attributed to errors in analysis, transcription, or calculation will be clearly identified in the case narrative section of the analytical data package.

8.2. Data Validation

Detailed data validation criteria and data validation protocol will be described in detail in the QAPP.

Records of QC activities, to be described in the QAPP, will be reviewed on an on-going basis and used for determination of data validity. Calibrations, sample data sheets and operator log entries will also be used in the validation process.

Data generated by the laboratory will be initially reviewed by the laboratory QA manager before data packages are forwarded to TRC's data manager. The data manager will verify that the data package is complete and contains all requested analyses, QC results, and raw data. The TRC data manager will identify any missing information and will contact the laboratory project manager to obtain this information. All QA/QC data will be compared to the data quality objectives and numerical control limits listed within laboratory SOPs. Any outliers will be identified and impacts on data quality and utility described.

Data are considered final when it can be demonstrated that they meet the data quality objectives of the program and are a true representation of the air quality and meteorological conditions being measured. Data must pass final validation criteria before submittal. Activities for Final Validation include:

- Generation of monthly data summaries

- Review of monthly data by TRC Program Manager, Data Manager and QA
- Resolution of any inconsistencies
- Update validation codes to final

8.3. Data Reporting

Monthly Summary Reports will be submitted to Blue Racer within 45 days after the end of each calendar month. Each report will be comprised of the following:

- Executive Summary;
- Hourly Values for meteorological parameters;
- 24-Hour concentrations for VOCs;
- Monthly data capture statistics; and
- Comparison relative to OEPA MAGLC.