



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

11/2/2015

Certified Mail

Kijun Hong  
Dennison CDP  
P.O. Box 54342  
Oklahoma City, OK 73154

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0679035007  
Permit Number: P0119108  
Permit Type: Initial Installation  
County: Tuscarawas

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

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

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

Sincerely,



Michael E. Hopkins, P.E.  
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SEDO



**FINAL**

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

Facility ID:	0679035007
Permit Number:	P0119108
Permit Type:	Initial Installation
Issued:	11/2/2015
Effective:	11/2/2015
Expiration:	11/2/2025





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

for  
Dennison CDP

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**Final Permit-to-Install and Operate**  
Dennison CDP  
**Permit Number:** P0119108  
**Facility ID:** 0679035007  
**Effective Date:** 11/2/2015

## Authorization

Facility ID: 0679035007  
Application Number(s): A0053553, A0053995  
Permit Number: P0119108  
Permit Description: Natural gas Central Delivery Point (CDP) facility: two (2) 210-bbl condensate storage tanks, two (2) 400-bbl produced water storage tanks, two (2) 535-gal methanol storage tanks, truck loading operations, one (1) dessicant dehydration unit, emissions from fugitive sources, and emissions from unpaved roadways.  
Permit Type: Initial Installation  
Permit Fee: \$1,400.00  
Issue Date: 11/2/2015  
Effective Date: 11/2/2015  
Expiration Date: 11/2/2025  
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Dennison CDP  
8528 Woford Rd SE  
Uhrichsville, OH 44683

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

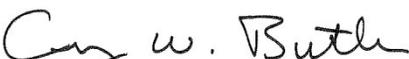
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0119108

Permit Description: Natural gas Central Delivery Point (CDP) facility: two (2) 210-bbl condensate storage tanks, two (2) 400-bbl produced water storage tanks, two (2) 535-gal methanol storage tanks, truck loading operations, one (1) dessicant dehydration unit, emissions from fugitive sources, and emissions from unpaved roadways.

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

- Emissions Unit ID: J001**  
 Company Equipment ID: TL-1  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: J002**  
 Company Equipment ID: TL-2  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: J003**  
 Company Equipment ID: TL-3  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P001**  
 Company Equipment ID: DESC DEHY  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable
- Emissions Unit ID: P901**  
 Company Equipment ID: FUG  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable

**Group Name: Condensate Storage Tanks**

<b>Emissions Unit ID:</b>	<b>T001</b>
Company Equipment ID:	T-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T002</b>
Company Equipment ID:	T-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Produced Water Tanks**

<b>Emissions Unit ID:</b>	<b>T003</b>
Company Equipment ID:	T-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T004</b>
Company Equipment ID:	T-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Dennison CDP  
**Permit Number:** P0119108  
**Facility ID:** 0679035007  
**Effective Date:** 11/2/2015

## **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**  
Dennison CDP  
**Permit Number:** P0119108  
**Facility ID:** 0679035007  
**Effective Date:** 11/2/2015

## **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. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), is not necessary if/when the maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, from all sources in the project, is less than 1.0 ton per year (or are subject to a standard under 40 CFR Part 63). OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
3. Within six months of startup of the facility, the permittee shall collect and analyze a representative sample of the incoming gas and liquids. The permittee shall use the results of the analysis to recalculate the emissions from the various components at the facility utilizing the GRI-GLYCalc or other standard software/emission factors. The permittee shall then compare the results of the revised calculations with the calculations submitted with the air pollution control permit application(s). If the emissions results are significantly different from those results submitted with the application, then the applicant shall submit the revised calculations to the appropriate District Office or Local Air Authority. The applicant should provide all input data used, the basis for each input value used, and the results provided by the program.
4. 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. 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.



**Final Permit-to-Install and Operate**  
Dennison CDP  
**Permit Number:** P0119108  
**Facility ID:** 0679035007  
**Effective Date:** 11/2/2015

## **C. Emissions Unit Terms and Conditions**

**1. J001, TL-1**

**Operations, Property and/or Equipment Description:**

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. b)(1)b.

(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	Volatile organic compound (VOC) emissions shall not exceed 0.01 tons per month averaged over a 12-month rolling period.  See b)(2)a. below.
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 calculated annual emissions rate is less than 10 tons/year.  See b)(2)b. below.

- (2) Additional Terms and Conditions
  - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves 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) All loading operations performed at this emissions unit shall employ submerged or bottom fill.
  - (2) The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
  - (3) During the loading of materials from the tank to the tank truck, the permittee shall continually monitor the transfer equipment, the tank and the tank truck for any leaks through visual, olfactory, or other observations. If any leak is detected, loading of the materials shall cease until the leaking component has been repaired.
  - (4) 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 throughput of condensate for each month, in gallons; and
    - b. the annual throughput of condensate, in gallons.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

VOC emissions shall not exceed 0.01 ton per month, averaged over a rolling 12-month period.

Applicable Compliance Method

Compliance with the monthly average VOC emission limitation, for each rolling, 12-month period shall be demonstrated by the below "Loading Loss Equation" (AP-42, Section 5.2 for Transportation and Marketing of Petroleum Liquids) to determine the pounds of VOC per 1,000 gallons of liquid load for each liquid type. The results from the equations for each liquid type are then multiplied by the corresponding material throughput (gallons) for each month as recorded by d)(1) and converted to tons by dividing by 2,000 pounds/ton. The sum of the current months VOC emissions for all liquid types is then added to the previous 11 months VOC totals, and divided by 12 months to obtain the monthly average, 12-month rolling period of emissions.

Loading Loss Equation:

For the uncontrolled loading, the VOC emissions shall be calculated by an uncontrolled loading loss factor ( $L_{UC}$ ):

$$L_{UC} = 12.46 \text{ SPM/T}$$

Where:

L = loading loss, pounds per 1,000 gallons loaded (Q)

S = saturation factor, 0.6 for submerged fill, 1.45 for splash fill

P = vapor pressure of liquid loaded, pounds per square inch absolute

M = molecular weight of vapor

T = temperature of bulk liquid ( $^{\circ}\text{R}$ ).

g) Miscellaneous Requirements

(1) None.

**2. J002, TL-2**

**Operations, Property and/or Equipment Description:**

Produced Water 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. b)(1)b.
  - (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	Volatile organic compound (VOC) emissions shall not exceed 0.01 tons per month averaged over a 12-month rolling period.  See b)(2)a. below.
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 calculated annual emissions rate is less than 10 tons/year.  See b)(2)b. below.

- (2) Additional Terms and Conditions
  - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves 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) All loading operations performed at this emissions unit shall employ submerged or bottom fill.
  - (2) The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
  - (3) During the loading of materials from the tank to the tank truck, the permittee shall continually monitor the transfer equipment, the tank and the tank truck for any leaks through visual, olfactory, or other observations. If any leak is detected, loading of the materials shall cease until the leaking component has been repaired.
  - (4) The permittee shall not permit produced water to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain monthly records of the following information:
    - a. the throughput of produced water for each month, in gallons; and
    - b. the annual throughput of produced water, in gallons.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation

VOC emissions shall not exceed 0.01 ton per month, averaged over a rolling 12-month period.

Applicable Compliance Method

Compliance with the monthly average VOC emission limitation, for each rolling, 12-month period shall be demonstrated by the below "Loading Loss Equation" (AP-42, Section 5.2 for Transportation and Marketing of Petroleum Liquids) to determine the pounds of VOC per 1,000 gallons of liquid load for each liquid type. The results from the equations for each liquid type are then multiplied by the corresponding material throughput (gallons) for each month as recorded by d)(1) and converted to tons by dividing by 2,000 pounds/ton. The sum of the current months VOC emissions for all liquid types is then added to the previous 11 months VOC totals, and divided by 12 months to obtain the monthly average, 12-month rolling period of emissions.

Loading Loss Equation:

For the uncontrolled loading, the VOC emissions shall be calculated by an uncontrolled loading loss factor ( $L_{UC}$ ):

$$L_{UC} = 12.46 \text{ SPM/T}$$

Where:

L = loading loss, pounds per 1,000 gallons loaded (Q)

S = saturation factor, 0.6 for submerged fill, 1.45 for splash fill

P = vapor pressure of liquid loaded, pounds per square inch absolute

M = molecular weight of vapor

T = temperature of bulk liquid ( $^{\circ}\text{R}$ ).

g) Miscellaneous Requirements

(1) None.

**3. J003, TL-3**

**Operations, Property and/or Equipment Description:**

Methanol 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. b)(1)b.

(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	Volatile organic compound (VOC) emissions shall not exceed 0.03 tons per month averaged over a 12-month rolling period.  See b)(2)a. below.
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 calculated annual emissions rate is less than 10 tons/year.  See b)(2)b. below.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves 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) All methanol loading lines shall be equipped with fittings which are vapor tight.
  - (2) The permittee shall not permit methanol 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 throughput of methanol for each month, in gallons; and
    - b. the annual throughput of methanol, in gallons.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation

VOC emissions shall not exceed 0.03 ton per month, averaged over a rolling 12-month period.

Applicable Compliance Method

Compliance with the monthly average VOC emission limitation, for each rolling, 12-month period shall be demonstrated by the below "Loading Loss Equation" (AP-42, Section 5.2 for Transportation and Marketing of Petroleum Liquids) to determine the pounds of VOC per 1,000 gallons of liquid load for each liquid

type. The results from the equations for each liquid type are then multiplied by the corresponding material throughput (gallons) for each month as recorded by d)(1) and converted to tons by dividing by 2,000 pounds/ton. The sum of the current months VOC emissions for all liquid types is then added to the previous 11 months VOC totals, and divided by 12 months to obtain the monthly average, 12-month rolling period of emissions.

Loading Loss Equation:

For the uncontrolled loading, the VOC emissions shall be calculated by an uncontrolled loading loss factor ( $L_{UC}$ ):

$$L_{UC} = 12.46 \text{ SPM/T}$$

Where:

L = loading loss, pounds per 1,000 gallons loaded (Q)

S = saturation factor, 0.6 for submerged fill, 1.45 for splash fill

P = vapor pressure of liquid loaded, pounds per square inch absolute

M = molecular weight of vapor

T = temperature of bulk liquid ( $^{\circ}\text{R}$ ).

g) Miscellaneous Requirements

(1) None.

**4. P001, Desiccant dehydration system maintenance blowdowns**

**Operations, Property and/or Equipment Description:**

Desiccant dehydration system maintenance blowdowns

- 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. b)(1)b.
  - (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	Volatile organic compound (VOC) emissions shall not exceed 0.04 tons per month averaged over a 12-month rolling period.  See b)(2)a. below.
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 calculated annual emissions rate is less than 10 tons/year.  See b)(2)b. below.

- (2) Additional Terms and Conditions
  - a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves 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) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain the following annual records for dessicant dehydration blowdown events:
    - (2) The total number and date of each blowdown event;
    - (3) Mole percent of each VOC component in the gas stream obtained using a representative sampling and analysis (e.g., gas chromatography);
    - (4) total volume of gas emitted in scf from each event; and
    - (5) total volume of gas emitted in scf from all events per year.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- f) Testing Requirements
  - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation  
  
VOC emissions shall not exceed 0.04 ton per month, averaged over a rolling 12-month period.



Applicable Compliance Method:

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

VOC (tons/year) = sum of the following for each VOC component:

= [molecular weight x ((volume of gas emitted/year) x (mole % of each VOC component/year)) / molar volume conversion] x (1 ton/2,000 pounds)

g) Miscellaneous Requirements

(1) None.

**5. P901, Fugitive Emissions**

**Operations, Property and/or Equipment Description:**

Equipment leaks from various equipment components, including connectors, flanges, and valves and fugitive emissions from pneumatic controllers.

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. b)(1)b.

(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 compounds (VOC) emissions shall not exceed 0.40 ton per month averaged over a twelve-month, rolling period.  See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The 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 tpy.  See b)(2)b. below.
c.	40 CFR Part 60, Subpart OOOO (60.5360-60.5430)  [In accordance with 40 CFR 60.5365(d)(2), the affected facility is	For the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	<p>each single continuous bleed natural-gas driven pneumatic controllers operating at a natural gas bleed rate greater at 6 scfh in the natural gas production segment between the wellhead and point of custody transfer to an natural gas pipeline subject to the emissions limitations/control measures specified in this section.]</p>	<p>plants), a pneumatic controller affected facility is a single continuous bleed natural gas –driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh (that commence construction, modification or reconstruction after August 23, 2011).</p> <p>Each pneumatic controller affected facility constructed, modified or reconstructed on or after October 15, 2013, at a location between the wellhead and a natural gas processing plant must have a bleed rate less than or equal to 6 standard cubic feet per hour.</p> <p>Each pneumatic controller constructed, modified, or reconstructed on or after October 15, 2013, located between the wellhead and a natural gas processing plant, must be tagged with the month and year of installation, reconstruction or modification, and identification information that allows traceability to the records for that controller as required in 40 CFR 60.5420(c)(4)(iii).</p> <p>See b)(2)c. below.</p>
d.	40 CFR Part 60.1 – 19 (40 CFR 60.4246)	Table 3 to Subpart OOOO of 40 CFR Part 60 – Applicability of General Provisions to Subpart OOOO shows which part of the General Provisions in 40 CFR Part 60.1 – 19 apply.

(2) Additional Terms and Conditions

- a. The BAT emission limit applies until US EPA approves 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. Initial compliance for each pneumatic controller must be demonstrated by compliance with the requirements in (d)(1) through (6) of 60.5410(d), and continuous compliance for each pneumatic controller must be demonstrated by compliance with the requirements in (d)(1) through (3) of 40 CFR 60.5415(d).

c) Operational Restrictions

(1) Pneumatic Controller Restrictions

The requirements of 40 CFR 60.5390(c)(1) are not required if you determine that the use of a pneumatic controller affected facility with a bleed rate greater than the applicable standard is required based on functional needs, including but not limited to response time, safety and positive actuation. However, you must tag such pneumatic controller with the month and year of installation, reconstruction or modification, and identification information that allows traceability to the records for that pneumatic controller, as required in 40 CFR 60.5420(c)(4)(ii).

Each pneumatic controller affected facility installed, modified, or reconstructed on or after 10/15/13 at a located between the wellhead and a natural gas processing plant or the point of custody transfer to an oil pipeline, must be designed and operated with a bleed rate less than or equal to 6 standard cubic feet per hour (6 scf/hr).

d) Monitoring and/or Recordkeeping Requirements

(1) Pneumatic Controllers Affected Facilities

a. Each natural gas-driven pneumatic controller affected facility installed or reconstructed on or after 10/15/2013, located between the wellhead and natural gas processing plant shall be tagged with the month and year of installation, reconstruction, or modification and with information that allows traceability to the records for that pneumatic controller.

b. The following records shall be maintained for each natural gas-driven pneumatic controller installed at the facility after 8/23/2011:

i. records of the date installed or reconstructed, the location and/or equipment each controller is servicing, and the manufacturer specifications;

ii. if applicable, the records needed to demonstrate why the operations require the use of a pneumatic controller with a bleed rate greater than 6 scf/hr and the functional basis for requiring the higher bleed rate; or

iii. if installed on or after 10/15/2013, records of the manufacturer's specification indicating that the pneumatic controller is designed to have a natural gas bleed rate less than or equal to 6 scf/hr; or

iv. if the pneumatic controller has been installed on or after 8/23/2011 and before 10/15/2013, the manufacturer's designed bleed rate; and

v. where a higher bleed rate has not been demonstrated to be needed, the records of any deviations from the 6 scf/hr bleed rate for each pneumatic controller installed on or after 10/15/2013.

c. Once a gas-driven pneumatic controlled has been documented to have a bleed rate less than or equal to 6 scf/hr, it is no longer subject to the requirements of

Part 60 Subpart OOOO. The manufacturer's specifications for the pneumatic controller and/or other records demonstrating compliance or exemption from the requirements should be maintained.

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.5390(c)(2)	Tag each pneumatic controller affected facility constructed, modified or reconstructed on or after 10/15/2013 with the month and year of installation and identification information to allow traceability of the records for each controller
60.5390(f) and 60.5420(c)(4)(i)	Maintain records of the date, location and manufacturer specifications for each pneumatic controller affected facility constructed, modified or reconstructed
60.5390(f) and 60.5420(c)(4)(ii)	Maintain records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard is required and the reasons why
60.5390(f) and 60.5420(c)(4)(iii)	If the pneumatic controller is not located at a natural gas processing plant, maintain records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour
60.5390(f) and 60.5420(c)(4)(iv)	Maintain records of deviations in cases where the pneumatic controller was not operated in compliance with the requirements specified in §60.5390.

- (3) Fugitive Leaks

The permittee shall perform daily inspections, each day that an operator is at the facility and when the facility is in operation, for indications of releases from the pressure relief valves, and any olfactory, visual or auditory indications of equipment leaks. The positive indication of a release or a leak shall be noted in an operations log, along with the following information:

- a. the name of the inspector;
- b. the date and time inspected;
- c. the identification of the pressure relief valve that released and/or piece of equipment that leaked;
- d. the estimated or calculated duration of the pressure relief valve release and/or equipment leak and the estimated emission totals; and
- e. any corrective actions taken to minimize or eliminate the release or leak.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (3) Pneumatic Controller Reporting

The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart OOOO, including the following sections:

60.7(a)(1), (3) and (4), 60.5390(f), and 60.5420(a)(1)	Initial notifications not required for pneumatic controller affected facilities.
60.5390(f) and 60.5420(b)	Submit annual reports containing the information in 40 CFR 60.5420(b)(5) for each pneumatic controller. The initial annual report must be received no later than 90 days after the end of the initial compliance period, and subsequent annual reports are due no later than the same date each year as the initial annual report

f) Testing Requirements

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



a. Emissions Limitation

Fugitive VOC emissions shall not exceed 0.40 ton per month averaged over a twelve-month, rolling period.

Applicable Compliance Method:

Compliance with the fugitive VOC emissions limitation is demonstrated by the following calculation based on the emissions factors provided in permittee's application for pneumatic devices and the emission factors in EPA's Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017) and component counts provided in permittee's application for component leaks.

b. Emission Limitation:

Each pneumatic controller NSPS affected facility installed after 10/15/2013 shall be operated with a bleed rate less than or equal to 6 scf/hr, unless it can be demonstrated that the pneumatic controller needs to have a higher bleed rate based on functional needs.

Applicable Compliance Method:

Compliance shall be demonstrated through the recordkeeping provision of conditions in d)(2) above.

g) Miscellaneous Requirements

(1) None.

**6. Emissions Unit Group -Condensate Storage Tanks: T001,T002,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
T001	210-bbl Condensate Storage Tank
T002	210-bbl Condensate Storage 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. b)(1)b.

(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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Total VOC emissions (including breathing losses, working losses, and flashing losses) from each emissions unit shall not exceed 0.49 ton per month averaged over a rolling 12-month period.  In order to comply with the ton per month emission limit, utilize the following controls:  Use of submerged or bottom fill.  See b)(2)a. below
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



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		source since the calculated annual emissions rate is less than 10 tons/year.  See b)(2)b. below.
c.	Part 60, Subpart OOOO Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution	The potential VOC emissions are calculated to be less than 6 TPY and are therefore not subject to this rule.  See b)(2)c. below.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emissions limit applies until U.S. EPA approves 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. Unless meeting the requirements of 40 CFR 60.5395(d)(2), where the uncontrolled actual VOC emissions can be demonstrated to be less than 4 tons per year, or where it has been demonstrated that the potential VOC emissions are less than 6 TPY, the VOC emissions from each storage vessel affected facility shall be reduced by 95.0 percent by April 15, 2014, or within 60 days after startup, for Group 2 storage vessels; or by April 15, 2015 for Group 1 storage vessels.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following records for each storage vessel:
  - a. the lab analyses, calculations, and process simulation model results documenting the annual emissions from breathing, working, and flashing losses; and
  - b. the records for the content and monthly and annual throughput (in gallons per month and rolling 12-months).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section

of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
- (3) The permittee shall submit an initial annual report within 90 days after the end of the initial compliance period for each storage vessel determined to have potential VOC emissions equal or greater than 6 tons per year. Subsequent annual reports are due no later than the same date each year following the initial report. The reports shall include the information identified in 40 CFR 60.5420(b).

f) **Testing Requirements**

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

a. Emission Limitation:

Total VOC emissions (including breathing losses, working losses, and flashing losses) from each emissions unit shall not exceed 0.49 ton per month averaged over a rolling 12-month period.

Applicable Compliance Method:

Compliance with the emissions limitation for VOC shall be demonstrated using EP- Tanks, Promax, or another Ohio EPA approved program, such as but not limited to HYSYS or ProMax to calculate flash losses, and the actual liquid throughout for the records required by d)(1) above.

g) **Miscellaneous Requirements**

- (1) None.

**7. Emissions Unit Group -Produced Water Tanks: T003,T004,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
T003	400-bbl Produced Water Storage Tank
T004	400-bbl Produced Water Storage 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. b)(1)b.

(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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) June 30, 2008	Total VOC emissions (including breathing losses, working losses, and flashing losses) from each emissions unit shall not exceed 0.49 ton per month averaged over a rolling 12-month period.  In order to comply with the ton per month emission limit, utilize the following controls:  Use of submerged or bottom fill.  See b)(2)a. below
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 calculated annual



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions rate is less than 10 tons/year. See b)(2)b. below.
c.	Part 60, Subpart OOOO Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution	The potential VOC emissions are calculated to be less than 6 TPY and are therefore not subject to this rule.  See b)(2)c. and b)(2)d. below.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emissions limit applies until U.S. EPA approves 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. Unless meeting the requirements of 40 CFR 60.5395(d)(2), where the uncontrolled actual VOC emissions can be demonstrated to be less than 4 tons per year, or where it has been demonstrated that the potential VOC emissions are less than 6 TPY, the VOC emissions from each storage vessel affected facility shall be reduced by 95.0 percent by April 15, 2014, or within 60 days after startup, for Group 2 storage vessels; or by April 15, 2015 for Group 1 storage vessels.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following records for each storage vessel:
  - a. the lab analyses, calculations, and process simulation model results documenting the annual emissions from breathing, working, and flashing losses; and
  - b. the records for the content and monthly and annual throughput (in gallons per month and rolling 12-months).

e) Reporting Requirements

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

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.
  - (3) The permittee shall submit an initial annual report within 90 days after the end of the initial compliance period for each storage vessel determined to have potential VOC emissions equal or greater than 6 tons per year. Subsequent annual reports are due no later than the same date each year following the initial report. The reports shall include the information identified in 40 CFR 60.5420(b).
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

Total VOC emissions (including breathing losses, working losses, and flashing losses) from each emissions unit shall not exceed 0.49 ton per month averaged over a rolling 12-month period.
    - b. Applicable Compliance Method:

Compliance with the emissions limitation for VOC shall be demonstrated using EP- Tanks, Promax, or another Ohio EPA approved program, such as but not limited to HYSYS or ProMax to calculate flash losses, and the actual liquid throughout for the records required by d)(1) above.
- g) Miscellaneous Requirements
- (1) None.