



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

11/8/2016

Certified Mail

Reagan Mayces
 Texas Eastern Transmission LP - Colerain
 P.O. Box 1642
 Houston, TX 77251-1642

| | |
|----|------------------------------------|
| 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: 0607005013
 Permit Number: P0119480
 Permit Type: OAC Chapter 3745-31 Modification
 County: Belmont

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**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, 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
Texas Eastern Transmission LP - Colerain**

| | |
|----------------|----------------------------------|
| Facility ID: | 0607005013 |
| Permit Number: | P0119480 |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Issued: | 11/8/2016 |
| Effective: | 11/8/2016 |
| Expiration: | 12/16/2024 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
Texas Eastern Transmission LP - Colerain

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Final Permit-to-Install and Operate
Texas Eastern Transmission LP - Colerain
Permit Number: P0119480
Facility ID: 0607005013
Effective Date: 11/8/2016

Authorization

Facility ID: 0607005013
Application Number(s): A0054206
Permit Number: P0119480
Permit Description: mod various
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$700.00
Issue Date: 11/8/2016
Effective Date: 11/8/2016
Expiration Date: 12/16/2024
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Texas Eastern Transmission LP - Colerain
Vickers Road
Colerain Twp., OH 43916

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

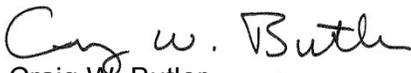
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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: P0119480
Permit Description: mod various

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-PL and TL-TK1 |
| Superseded Permit Number: | P0115712 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P009 |
| Company Equipment ID: | COLE-GR |
| Superseded Permit Number: | P0115712 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P801 |
| Company Equipment ID: | PC NG, PL, OIL |
| Superseded Permit Number: | P0115712 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | T001 |
| Company Equipment ID: | see above |
| Superseded Permit Number: | P0115712 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
Texas Eastern Transmission LP - Colerain
Permit Number: P0119480
Facility ID: 0607005013
Effective Date: 11/8/2016

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
Texas Eastern Transmission LP - Colerain
Permit Number: P0119480
Facility ID: 0607005013
Effective Date: 11/8/2016

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) See B.2.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), for this project (P0119945 concurrent) was not necessary because for the emissions units not exempted from modeling per OEPA Engineering Guide #69, maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year when controlled. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTI prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.



Final Permit-to-Install and Operate
Texas Eastern Transmission LP - Colerain
Permit Number: P0119480
Facility ID: 0607005013
Effective Date: 11/8/2016

C. Emissions Unit Terms and Conditions



1. J001, Truck Loading

Operations, Property, and/or Equipment Description:

Tanker truck loading of pipeline liquids (4,400 gal/yr maximum) and lubricating oil (20,520 gal/yr); increased transfers result in increased emissions constituting a modification of P0115712

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. See b)(1)b. and b)(2)b. below.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|--|
| a. | OAC rule 3745-31-05(A)(3), as effective June 30, 2008 | Volatile organic compounds (VOC) emissions shall not exceed 0.001 tons/m as a rolling, 12-month average. See b)(2)a. below. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 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 PTE is < 10 TPY. See b)(2)b. below. |

- (2) Additional Terms and Conditions
 - a. This Best Available Technology (BAT) emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption as part of the Ohio State Implementation Plan (SIP)).
 - b. These requirements apply once US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption) as part of the Ohio SIP.
- c) Operational Restrictions
 - (1) The driver/operator shall verify the delivery vessel and flash/storage vessel hatches to be in good condition, closed and properly seated always during the loading of the delivery vessel. Prior to connecting the transfer line(s) from the storage tank to the tanker 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.
 - (2) During loading from the storage tank to the tanker truck, the permittee shall continually monitor the transfer equipment, the storage tank, and the tanker truck for any leaks through visual, olfactory, or other observations. If any leak is detected, loading of the produced water shall cease until the leaking component has been repaired.
 - (3) 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 throughput records of the amount of pipeline liquids and the amount of lubricating oil transferred per month for this emission unit.
 - (2) For transfer operations, the permittee shall maintain a record of the following information:
 - a. the date any leak was detected;
 - b. the findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;
 - c. the leak detection method;
 - d. the corrective action(s) taken to repair each leak and the date of final repair; and
 - e. the inspector's name and signature.
- e) Reporting Requirements
 - (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

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

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 0.001 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

The monthly VOC emissions limitation averaged over a 12-month, rolling period was derived by the potential monthly VOC emissions from truck loading, calculated as follows from the maximum annual throughput and material properties as provided in the permittee's application from the loading load loss equation (equation 1) in AP-42 5.2 (6/08):

$$Ll = 12.46 \frac{SPM}{T}$$

Where:

Ll = loading loss, lb/1,000 gallons

S = saturation factor

T = temperature of bulk liquid loaded, 518.5 °R

Throughput = gallons/year

VOC emissions from pipeline liquids (L_{pl})

$$= Ll * throughput * \frac{10E3 \text{ gal}}{1,000 \text{ gal}} = 21.3811 \text{ lb/yr}$$

VOC emissions from oil (L_o)

$$= Ll * throughput * \frac{10E3 \text{ gal}}{1,000 \text{ gal}} = 0.6 \text{ lb/yr}$$

VOC emission per rolling, 12-month average

$$= (L_{pl} + L_o) * \frac{\text{ton}}{2,000\text{lbs}} * \frac{\text{year}}{12 \text{ months}} = 0.001 \text{ ton/month}$$

Compliance shall be determined by the above calculation and the records required by d)(1) above.

g) Miscellaneous Requirements

- (1) None.

2. P009, Gas Releases

Operations, Property, and/or Equipment Description:

Uncontrolled gas releases, a Chapter 31 modification for increases in gas releases for a maximum of 43,650,000 scfy, supersedes P0115712

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3) and ORC 3704.03(T) | Volatile organic compounds (VOC) emissions shall not exceed 2.45 tons per month as a rolling, 12-month average. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following records:

- a. the date, number, and type of each release event;
- b. percent VOC fraction in the gas stream obtained by representative sampling and analysis (e.g., gas chromatography);
- c. total volume of gas emitted from each release event; and
- d. total volume of gas emitted from all release events per year.

e) Reporting Requirements

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

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 2.45 tons per month as a rolling, 12-month average.

Applicable Compliance Method:

The monthly VOC emissions limitation averaged over a 12-month, rolling period was derived by the potential monthly VOC emissions from planned gas releases as proposed in the application, calculated as follows:

$$VOC \left(\frac{tons}{month} \right) = n * p * \%VOC_w * \frac{1 ton}{2,000lbs} * \frac{year}{12 months} = \frac{2.45 tons VOC}{12 m rolling}$$

Where:

n = annual gas releases

p = gas density

%VOC_w = percent VOC by weight (average with safety factor)

Volume of gas released per planned release event and material properties of gas as provided in application which is based on historic sampling data.

Compliance shall be determined by the above calculation and the records required by d)(1) above.



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- g) Miscellaneous Requirements
 - (1) None.

3. P801, Equipment Leaks

Operations, Property, and/or Equipment Description:

Fugitive equipment leaks from equipment components, a Chapter 31 modification for increases in equipment, supersedes P0115712

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3) and ORC 3704.03(T) | Volatile organic compounds (VOC) emissions shall not exceed 1.16 tons per month as a rolling, 12-month average. |
| b. | 40 CFR Part 60, Subpart OOOOa (40 CFR 60.5360a – 5499a) [In accordance with 40 CFR 60.5365a(j) and 60.5430a this emissions unit is located at a compressor station that commenced construction or was modified after September 18, 2015] | All fugitive emission components must be monitored and replaced or repaired according to the provisions of this subpart. |
| c. | 40 CFR Part 60.1 – 19, Subpart A | Table 3 to 40 CFR 60, Subpart OOOOa identifies the sections of 40 CFR 60, Subpart A with which the permittee must comply. |

(2) Additional Terms and Conditions

- a. The permittee shall comply with the additional requirements required under 40 CFR Part 60, Subpart OOOOa, including the following sections:

| | |
|-----------------|--|
| 60.5370a(a) | Compliance deadline |
| 60.5370a(b) | Maintain and operate equipment in manner consistent with good air pollution control practice for minimizing emissions. |
| 60.5370a(c) | Exemption from obligation to obtain a Title V permit. |
| 60.5397a(a) | Definition of fugitive emissions. |
| 60.5398a(a)-(f) | Alternative means requirements |

c) Operational Restrictions

- (1) The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart OOOOa, including the following sections:

| | |
|-----------------------|--|
| 60.5397a(a) | Repair all sources of fugitive emissions in accordance with paragraph (h) of 40 CFR Part 60, Subpart OOOOa. |
| 60.5397a(h)(1) | Repair or replace each identified source of fugitive emissions as soon as practicable, but no later than 30 calendar days after detection. |
| 60.5397a(h)(2) | If the repair or replace is technically infeasible, requires vent blowdown, a compressor shutdown, or would be unsafe to repair during operation, the repair or replacement must be completed during the next compressor shutdown, after an unscheduled, planned or emergency vent blowdown or within 2 years, whichever is earlier. |
| 60.5397a(h)(3) | Conduct resurvey on any repaired or replaced component as soon as practicable, but no later than 30 days after being repaired. |
| 60.5397a(h)(3)(i)-(v) | Required Methodology for surveys after repair or replacement. |

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping of 40 CFR Part 60, Subpart OOOOa, including the following sections:

| | |
|-----------------------------------|---|
| 60.5397a(a) | Monitor all fugitive emissions components in accordance with paragraphs (b) through (g) of 40 CFR Part 60, Subpart OOOOa. |
| 60.5397a(a) | Maintain records in accordance with paragraph (i) of 40 CFR Part 60, Subpart OOOOa. |
| 60.5397a(b) | Develop emissions monitoring plan in accordance with paragraphs (c) and (d) of 40 CFR Part 60, Subpart OOOOa. |
| 60.5397a(c)(1)-(8) and (d)(1)-(4) | Information required in monitoring plan |
| 60.5397a(e) | Monitoring survey shall observe each component for fugitive emissions. |
| 60.5397a(f)(2) | You must conduct an initial monitoring survey within 60 days of the startup of a new compressor station for each new collection of fugitive emissions components at the new compressor station or by June 3, 2017, whichever is later. For a modified collection of fugitive components at a compressor station, the initial monitoring survey must be conducted within 60 days of the modification or by June 3, 2017, whichever is later. |
| 60.5397a(g) | Perform monitoring survey at the frequencies specified in paragraphs (g)(1) and (2) of 40 CFR 60, Subpart OOOOa, with exceptions noted in paragraph (g)(3) and (4) of 40 CFR Part 60, Subpart OOOOa. |
| 60.5397a(g)(2) | Conduct quarterly monitoring survey at compressor station at least quarterly after initial survey. Consecutive quarterly monitoring surveys must be conducted at least 60 days apart. |
| 60.5397a(g)(3)(i)-(iv) | Identify difficult-to-monitor components, develop written plan, and inspect once a year. |
| 60.5397a(g)(4)(i)-(iv) | Identify unsafe-to monitor components and develop written plan. |

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.

- (3) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart OOOOa, including the following sections:

| | |
|--|---|
| 60.5397a(a), 60.5397a(j), 60.5420a(b), 60.5415a(h)(4), | Annual reports for collection of fugitive emissions components. |
| 60.5420a(b)(1) | General information required for all reports |
| 60.5420a(b)(7) | If survey was waived under 60.5397a(g)(5), include in annual report that the survey was waived and the months of the calendar quarter for in which the survey was waived. |

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions shall not exceed 1.16 tons/m as a rolling, 12-month average.

Applicable Compliance Method:

Compliance with the fugitive VOC emissions limitation shall be demonstrated by the following calculation based on the emissions factors provided in Tables 2-4 and 2-1 of US EPA's Protocol for Equipment Leak Emission Estimates (11/95) for components in gas, light oil, and heavy oil service and the information provided in the permittee's application:

$$\left(\sum \text{component count} * \text{component TOC EF} * \text{VOC weight percent} \right) \leq 1.16 \frac{\text{tons}}{\text{m}} \text{ as a rolling, 12 - month average}$$

Where component counts, max leak rates, TOC EFs, VOC weight percent, and scheduled maintenance venting parameters are based on the data provided in the permittee's application.

g) Miscellaneous Requirements

- (1) None.

4. T001, Pipeline Liquids Vessels

Operations, Property, and/or Equipment Description:

Loading, breathing and flashing losses for pipeline liquids from multiple separators and one-2,200-gallon vessel for pipeline liquids, a Chapter 31 modification for the increases in pipeline liquids throughput per year, supersedes PTIO P0119480

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. See b)(1)b. and b)(2)b. below.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|--|
| a. | OAC rule 3745-31-05(A)(3), as effective June 30, 2008 | Volatile organic compounds (VOC) emissions shall not exceed 0.17 tons/m as a rolling, 12-month average. See b)(2)a. below. |
| b. | OAC rule 3745-31-05(A)(3)(a)(ii), as effective 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 TPY. See b)(2)b. below. |



(2) Additional Terms and Conditions

- a. This BAT emissions limit applies until US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption as part of the Ohio State Implementation Plan (SIP).
- b. These requirements apply once US EPA approves OAC rule 3745-31-05(A)(3)(a)(ii) (the < 10 TPY BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the pipeline liquids throughput of the emissions unit in gallons/year.

e) Reporting Requirements

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

f) Testing Requirements

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

a. Emissions Limitation:

VOC shall not exceed 0.17 tons/m as a rolling, 12-month average.

The annual emissions limitation was established based on a maximum annual throughput and material properties per the permittee's application. Compliance with the annual emissions limitation shall be demonstrated based on the following calculation:

$$MER \left(\frac{\text{tons}}{\text{month}} \right) = \frac{\left(Ff \times Tp \times \frac{1 \text{ bbl}}{42 \text{ gal}} \times D_{\text{scf}}^{\text{lbs}} \times VOC \right) + (Sl + Wl)}{(2,000 \text{ lbs/ton}) \times (12 \text{ month/yr})}$$

Where:

MER = monthly VOC emission rate, in tons per month.



Ff = Flash factor, derived using actual stream sampling data and an overall mole balance for feed, vapor, and liquid streams;

Tp = annual throughput of pipeline liquids, in gallons, based on the information recorded in d)(1);

D = flash gas density, per the permittee's application;

VOC = % of VOC, by weight, in the flash gas, %per the permittee's application;

SI + WI = pounds of VOC per year; standing and working losses based on the information in Table F-2 through F-9 of the permittees application (A0050933) and U.S. EPA TANKS 4.09d, actual annual standing and working losses can be calculated based on the information in d)(1).

g) Miscellaneous Requirements

(1) None.