B. Facility-Wide Terms and Conditions

The following are the terms and conditions for a General PTI to be issued to a Title V facility.
1. 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.

   a) B.3.

2. The emissions unit contained in this permit must comply with various federal New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards. The complete NSPS and MACT requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District Office or local air agency. The permittee must comply with the applicable requirements of 40 CFR Part 63 Subpart HH as they apply to the emissions source.

3. 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.

4. Within six months of startup of the facility, the permittee shall collect and analyze a pressurized sample of the incoming gas and liquids, from the inlet separator. The permittee shall use the results of the analysis to recalculate the emissions from the various components at the facility utilizing the 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 more than 10% above the results submitted with the application, then the applicant shall submit the revised calculations to the appropriate District Office or Local Air Agency. The applicant should provide all input data used, the basis for each input value used, and the results provided by the program.

5. The company shall conduct annual sampling and 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 Volatile Organic Compounds (VOC) or any hazardous air pollutant (HAP)/toxic air contaminants. 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.

6. Records related to this permit may be maintained at an off-site location (e.g. regional office), provided they are made accessible when the need arises, otherwise by the next business day upon Ohio EPA request (or made viewable electronically on-site and submitted to Ohio EPA within 24 hours).
C. Emissions Unit Terms and Conditions
1. Emissions Unit: Dehydration System, P001

Operations, Property and/or Equipment Description:

<table>
<thead>
<tr>
<th>P001</th>
<th>Glycol dehydration unit with a maximum throughput of 90 MMscf/day</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Includes a contactor tower or absorption column, reboiler (with exempt heater), and gas-condensate-glycol (GCG) separator (flash separator), with 100% capture of the regenerator outlet and flash tank off gases (VOCs), which shall be vented through a condenser, and/or BTEX (benzene, toluene, ethyl benzene, xylene) elimination system with condenser, and/or to a flare/combustion device (or for use as site fuel).</td>
</tr>
</tbody>
</table>

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

(1) b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

<table>
<thead>
<tr>
<th>Applicable Rules/Requirements</th>
<th>Applicable Emissions Limitations/Control Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. OAC rule 3745-31-05(A)(3) as effective June 30, 2008</td>
<td>Compliance with 40 CFR Part 63, Subpart HH for control of Total Organic Compounds (TOC), total hazardous air pollutants (total HAP), or benzene; or for sources exempt from 40 CFR Part 63 Subpart HH, Volatile Organic Compounds (VOC) emissions shall not exceed 0.42 ton per month averaged over a 12-month rolling period, where exempt from the requirements of Part 63, Subpart HH. See b)(2)a. below.</td>
</tr>
<tr>
<td>b. OAC rule 3745-31-05(A)(3)(a)(ii) as effective June 30, 2008</td>
<td>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to VOC since the calculated annual emissions rate is less than 10 tons/year, taking into account 40</td>
</tr>
<tr>
<td>Applicable Rules/Requirements</td>
<td>Applicable Emissions Limitations/Control Measures</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>CFR Part 63, Subpart HH, or for exempt sources the voluntary restrictions from OAC rule 3745-31-05(E). See b)(2)b. below.</td>
<td>VOC emissions shall not exceed 0.42 ton per month averaged over a 12-month rolling period, for Subpart HH exempt sources. See b)(2)b. below.</td>
</tr>
<tr>
<td>OAC rule 3745-31-05(E) as effective June 30, 2008</td>
<td>VOC emissions shall not exceed 0.42 ton per month averaged over a 12-month rolling period, for Subpart HH exempt sources. See b)(2)b. below.</td>
</tr>
<tr>
<td>40 CFR Part 63, Subpart HH, National Emission Standards for hazardous air pollutants (NESHAP) from Oil and Natural Gas Production Facilities</td>
<td>Compliance with the applicable portions of 40 CFR Part 63, Subpart HH. Any final amendments to this rule will supersede any previous Subpart HH requirement(s) in this permit.</td>
</tr>
<tr>
<td>40 CFR 63.11(b)(4)</td>
<td>If facility is complying with the requirements of 40 CFR Part 63, Subpart HH through use of a flare, no visible emissions except for 5 minutes during any 2 consecutive hours.</td>
</tr>
</tbody>
</table>

(2) Additional Terms and Conditions

a. This BAT emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

b. These requirements apply once U.S. EPA approves OAC Rule 3745-31-05(A)(3)(a)(ii) as part of the Ohio SIP.

c) Operational Restrictions

(1) If this facility does not qualify for the dehydrator exemption found in 40 CFR Part 63.764(e), then this facility shall comply with all applicable operational restrictions and control requirements found in 40 CFR Part 63, Subpart HH, including the requirements for a flare.

(2) If this facility does qualify for the dehydrator exemption found in 40 CFR Part 63.764(e), then:

a. If a flare is used to control emissions from the dehydrator:

i. The flare shall be operated in accordance with the terms and conditions outlined in the compressor station flare Permit.
b. If a condenser (or BTEX elimination system) is used to control emissions from the dehydrator:

i. The condenser shall be operated at all times when gases are vented to it.

ii. The condenser must be equipped with a continuous temperature monitoring device that continuously monitors and records the dehydration outlet temperature.

iii. The condenser, temperature monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

c. In lieu of a flare or condenser, the facility may elect to reroute flash gases back into the process, provided a capture efficiency of 100% is achieved.

(3) The permittee shall comply with the applicable restriction requirements of 40 CFR Part 63, Subpart HH, including the following sections:

<table>
<thead>
<tr>
<th>Section</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>63.764(a)</td>
<td>Must comply with general provisions in 63.1</td>
</tr>
<tr>
<td>63.764(j)</td>
<td>Facility must operate and maintain control equipment consistent with safety and good air pollution control practices for minimizing emissions</td>
</tr>
<tr>
<td>63.765(b)(1)(ii)</td>
<td>Use of closed vent system and controls to decrease benzene emissions to less than 0.9 megagrams per year</td>
</tr>
<tr>
<td>63.765(c)(3)</td>
<td>Flash tank control requirements</td>
</tr>
<tr>
<td>63.771(c)</td>
<td>Closed vented requirements</td>
</tr>
<tr>
<td>63.771(d)(1), (d)(4)(i)</td>
<td>Control device requirements</td>
</tr>
</tbody>
</table>

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the annual facility natural gas or hydrocarbon liquid throughput or a record of the maximum potential annual throughput rate attainable, based on the physical and operational design of the unit, in accordance with 40 CFR 63.760(a), and/or maintain records of the annual actual average benzene emissions, in accordance with 40 CFR 63.772(b).

(2) Where a condenser (or BTEX elimination system) is used to control the dehydration process vent(s), the permittee shall:
a. monitor and record the temperature of the condenser each day that an operator is present at the facility; and

b. record all periods of time when the condenser is not operating to control the emissions from the dehydration process vent(s).

(3) For each triethylene glycol (TEG) dehydration unit, the permittee shall document the method of compliance as follows:

a. if the permittee is using the exemption for the annual average flow rate of natural gas to the TEG dehydration unit, the permittee shall either install and operate a monitoring instrument to directly measure and record the natural gas flow rate to the glycol dehydration unit or demonstrate to the Director’s satisfaction that the actual annual average natural gas flow rate to the dehydration unit is less than 85,000 scm/day, in accordance with 40 CFR 63.772(b)(1); or

b. if the permittee is using the exemption for the actual average benzene emissions from the TEG dehydration unit, the permittee shall keep the record of the determination (including the test methods and data used to support it) using either the GRI-GLYCalc™ model, another applicable software program, or by directly measuring benzene using the appropriate methods identified in 40 CFR 63.772(a)(1), in accordance with 40 CFR 63.772(b)(2); or

c. if the permittee does not meet one of the exemptions identified in 40 CFR 63.764(e) and is not located in a UA plus offset and UC boundary (as defined in 40 CFR 63.761), the permittee may (instead of meeting the control requirements) keep the record of the calculation for the optimal circulation rate (or alternate circulation rate as allowed using GRI-GLYCalc™ model) and records documenting this circulation rate is not exceeded in accordance with 40 CFR 63.764(d)(2); or

d. if the permittee does not meet one of the exemptions identified in 40 CFR 63.764(e) and is located in an Urban Area (UA) plus offset and Urban Cluster (UC) boundary (as defined in 40 CFR 63.761), the permittee shall comply with the control requirements specified in 40 CFR 63.765 and the monitoring and recordkeeping requirements identified in 40 CFR 63.764(d)(1) to demonstrate compliance.

(4) The permittee shall comply with the applicable monitoring and record keeping requirements of 40 CFR Part 63, Subpart HH, including the following sections:

<table>
<thead>
<tr>
<th>Section</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>63.760(a)(1)(ii)</td>
<td>Maintain records of the annual facility natural gas or hydrocarbon liquid throughput for each year.</td>
</tr>
<tr>
<td>63.773(b)</td>
<td>Control devices other than flares</td>
</tr>
</tbody>
</table>
shall develop an inspection and maintenance plan for each device

63.773(c)
Inspection and leak protocols for closed-vent systems

63.773(d)(1),(3)(i)(H)
Continuous monitoring requirements for control devices

63.773(d)(6),(7)
Excursion definitions for control devices and violations

63.774(b)
Records requirements

63.774(c)
Document method for achieving and demonstrating compliance with 0.9 megagrams per year of benzene

63.774(e)
Flare recordkeeping requirements

63.774(f)
Records of optimal glycol circulation rate

63.774(g)
Malfunction operation recordkeeping

63.774(h)
Records requirements of control device that is not a flare

e) Reporting Requirements.

(1) The reports required by this permit shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

(3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(4) The permittee shall submit the following as part of the annual fee emission report:

   a. the annual facility natural gas or hydrocarbon liquid throughput for the year of the report, in accordance with 40 CFR 63.760(a);

   b. identification of the kind of liquid glycol used in the dehydrator during the year of the report, e.g., ethylene glycol, diethylene glycol, or triethylene glycol*;
c. if the permittee is using triethylene glycol and meeting the exemption for the flow rate of natural gas to the TEG dehydration unit, the actual annual average natural gas flow rate to the TEG dehydration unit; and either the calculations and/or method of measurement of this flow rate or a statement that this flow rate was based on the maximum design capacity of the unit;

d. if the permittee is using triethylene glycol and meeting the exemption for benzene emissions, the actual annual average emissions of benzene from the TEG dehydration unit; and if these emissions were determined using the GRI-GLYCalc™ model, the method used to determine the benzene concentration entered into the model, and/or identification of the Method used for direct measurement;

e. if the permittee is using triethylene glycol and the area source is not located in an UA plus offset and UC boundary and does not meet one of the exemptions identified in 40 CFR 63.764(e), the calculation for the optimal circulation rate and the method of measurement for the gas flowrate (MMscf/day) and inlet/outlet water content (lbs/MMscf), and a statement as to whether or not the optimal circulation rate was exceeded, to include the date, duration, and the non-compliant circulation rate measured;

f. if the permittee is using triethylene glycol and the area source is located in an UA plus offset and UC boundary and does not meet one of the exemptions identified in 40 CFR 63.764(e), the method of control that was used to demonstrate compliance, the results of the compliance demonstration, and a statement as to whether or not the selected compliance option was met;

g. where a condenser (or BTEX elimination system) is used to control the dehydration outlet, all periods of time when the continuous temperature monitoring device for the condenser vapor outlet temperature is not working or is not continuously recording the vapor outlet temperature when process gas is being vented to the condenser; and

h. where the triethylene glycol dehydrator does not meet one of the exemptions in 40 CFR 63.764(e) or is not demonstrating compliance by documenting and maintaining the optimum glycol circulation rate as required in 40 CFR 63.764(d)(2), the flare or condenser used to demonstrate compliance shall meet all of the requirements of Part 63 Subpart HH.

* if not using triethylene glycol, the information in “c” through “i” is not required

(5) The permittee shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart HH, including the following sections:

<table>
<thead>
<tr>
<th>63.764(b)</th>
<th>Reports submitted to appropriate administrator</th>
</tr>
</thead>
</table>

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<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>63.775(a)</td>
<td>Compliance with 63.1-63.16 per Table 2 of this rule</td>
</tr>
<tr>
<td>63.775 (c)(1)</td>
<td>Initial notification</td>
</tr>
<tr>
<td>63.775(c)(7)</td>
<td>Supplemental information to be submitted with initial notification</td>
</tr>
<tr>
<td>63.775(d)</td>
<td>Notification of Compliance Status Report with supplemental information dependent on closed-vent system and type of control device</td>
</tr>
<tr>
<td>63.775(f)</td>
<td>Process change notifications</td>
</tr>
<tr>
<td>63.775(g)(1)</td>
<td>WebFIRE reporting requirements</td>
</tr>
</tbody>
</table>

f) Testing Requirements

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

(1) Emissions Limitation:

For total TOC, total HAP, or benzene, compliance with the applicable control requirements of 40 CFR Part 63, Subpart HH; or where meeting an exemption for the subpart:

Emissions from the glycol dehydration unit shall not exceed 0.42 ton of VOC (excludes methane and ethane) per month averaged over a 12-month rolling period.

Applicable Compliance Method:

The permittee may determine the annual total TOC (excludes methane and ethane), total HAP, or benzene emissions using the appropriate methods identified in 40 CFR 63.772, GRI-GLYCalc™ model, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual, and/or another applicable software program. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit(s) and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled “Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions” (GRI–95/0368.1);

Potential TOC, total HAP, and/or benzene emissions estimates shall be based on the maximum glycol circulation rate(s), in gallons per minute (gpm); the worst case pollutant concentrations from representative extended gas analyses of the inlet wet gas; and the maximum natural gas flow rate, as determined by 40 CFR 63.772(b)(1)(i); or for a new unit, potential emissions shall be estimated in accordance with 40 CFR 63.760(a) and increased by a factor of 1.2. The permittee may also determine the estimated annual VOC emission through direct
measurement using Method M25A or Method 18, both from Appendix A of Part 60.

[40 CFR 63.765(b)(1) and/or (c)(3)], [40 CFR 63.771(c) and (d)], [40 CFR 63.772], [40 CFR 63.773(d)], and [OAC rule 3745-31-05(E)]

g) Miscellaneous Requirements

(1) None.