



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUN 06 2016

REPLY TO THE ATTENTION OF

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Permit to Install (PTI), permit number P0118523, for Rover Pipeline – Seneca Compressor Station, located in Summerfield, Ohio. Although EPA did not specifically review the draft PTI permits for the other six Rover Pipeline compressor stations that are currently out for public comment, we request that you apply the comments below to the other six draft permits as appropriate. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

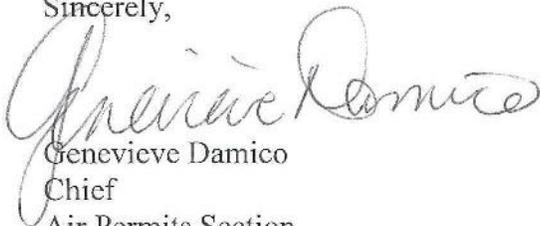
1. Permit conditions 3.g(1) on page 26 of 36 and 4.g(1) on page 33 of 36, as well as item 4 of the Permit Strategy Write-Up, states that some of the source's emission units may be subject to 40 CFR Part 60, Subpart OOOO once that rule's proposed amendments get finalized. The proposed amendments were finalized on May 12, 2016, so please indicate whether any of the emission units are subject to this New Source Performance Standard, and if so, please add the applicable requirements to the permit.
2. Permit condition 1.c(1) on page 14 of 36 contains the following vague language: "*by conducting routine operation and maintenance activities in a manner consistent with safety and good air pollution control practices.*" To improve the enforceability of the permit language, please specify the safety and good air pollution control practices for this source and list them in the permit as permit requirements.
3. For the PIGGING Operation on page 17 of 36, please consider the information in the attached EPA Discussion Draft "*Quantifying the Potential Impacts of Natural Gas Condensate Holdup on Uncontrolled Volatile Organic Compound Emissions from Pig Receivers During Depressurization in Wet Gas Gathering Operations*" (Attachment A) for use in the compliance method listed in permit condition 2.f(1)(a) on page 19 of 36 of the permit. Condensed liquids may be present in the pig receiver and volatilize as pressure in the pig receiver is reduced from pipeline pressure to atmospheric pressure during the process of pig retrieval. These volatilized liquids are ultimately emitted to the

atmosphere, and can comprise a significant portion of total Volatile Organic Compounds emitted during pigging operations, especially from pipelines that transport wet gas.

4. Permit condition 3.c(i) on page 21 of 36 requires a leak detection and repair (LDAR) program for the process equipment leaks, and that it shall follow the monitoring and recordkeeping requirements described in permit condition 5.d, but permit condition 5.d (on page 35 of 36) pertains to the amount of throughput and emissions from each slop/wastewater tank. Please explain how that relates to the LDAR program for the processes equipment leaks.
  
5. It's unclear whether this permit is a major, minor or synthetic minor source permit because there is contradictory information on the permits' cover page and the Permit Strategy Write-Up. The table on the permit cover page indicates that the permit is neither a Prevention of Significant Deterioration major source nor a netting permit, but items 1, 4, and 7 in the Permit Strategy Write-Up contradicts that by indicating: both a synthetic minor determination and a netting determination has been made for this source (item 1); engine emissions exceed major source thresholds (item 4); and that the nitrogen oxide (NOx) emissions are 103.69 tons per year (tpy) and the formaldehyde emissions are 13.14 tpy (item 7) indicating that the source is major for NOx and hazardous air pollutants (formaldehyde). Please clarify the status of the source/permit. If it is major, the permit would need to go through major New Source Review, if the source is synthetic minor, restrictions would need to be added to the permit, and if it is a netting permit, the draft permit would need to contain the netting analysis.

We appreciate the opportunity to provide comments on this permit and look forward to discussing them with you. If you have any questions, please feel free to contact Richard Angelbeck, of my staff, at (312) 886-9698.

Sincerely,



Genevieve Damico  
Chief  
Air Permits Section