



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

MAY 18 2016

REPLY TO THE ATTENTION OF

Dana Thompson
Ohio Environmental Protection Agency
Division of Air Pollution Control
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216

Dear Mr. Thompson,

The U.S. Environmental Protection Agency has reviewed the draft general permits for Mid-stream Compressor Stations. To ensure that the permits meet 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. For GP 21.1, for pigging operations, the calculation method does not account for emissions from liquid hydrocarbons which may result in an underestimation of emissions from this process overall. Condensed liquids may be present in the pig receiver and can 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. 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) in formulating a calculation methodology for emissions from the pigging process.
2. On September 18, 2015, EPA submitted comments during the interested party review period. Select comments were noted in the response to comment document issued by the Ohio Environmental Protection Agency on April 7, 2016. Comments made on GP 20.1 and GP 21.1 were similar comments to the testing sections of both permits. The testing sections included emission calculations that assume a capture efficiency of 97% or greater and a destruction efficiency of 98% or greater. However, the permit does not include a requirement to verify that the facility is achieving the efficiencies in the calculation method. The response to comment document noted that related updates were made to the respective sections, however, the updates did not include any additional conditions that would require the facility to verify compliance with the assumed capture and destruction efficiencies. Please see the attached letter (Attachment B) for the specific comments made. We recommend that Ohio EPA consider adding testing components to verify that facilities are meeting and maintaining the assumed capture and destruction efficiencies.
3. Additionally, several comments from the September 18, 2015 letter did not receive a response. Comments made on quality control documents (QCD) for GP 14.5 – 14.9, GP 17.1, and seven general

comments were unaddressed. The general comments were applicable to all of the GPs issued, this included clarifying language in the QCDs to minimize confusion in determining major source status, consideration to provide the option to use advanced technologies such as forward looking infrared cameras and digital opacity cameras where appropriate, ensuring all applicable requirements are contained in the permits such as New Source Performance Standards and Maximum Achievable Control Technology Standards, adding emphasis for facilities to ensure facility-wide emissions are below major source thresholds, and typographical errors. Please see the attached letter for the specific comments that were made. We recommend that Ohio EPA review the draft GP's for clarity and completeness. We also recommend that Ohio EPA consider allowing facilities to utilize advanced monitoring technologies as compliance options.

Thank you for the opportunity to provide comments on the draft general permits. If you have any questions, please contact me or Charmagne Ackerman, of my staff, at (312) 886-0448.

Sincerely,



Genevieve Damico
Chief
Air Permits Section

Attachments