



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

JUN 30 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank D. Tsuru, Manager
Utica East Ohio Midstream LLC
11543 State Route 644
Kensington, Ohio 44427

Re: Administrative Order EPA-5-16-113(a)-OH-22

Dear Mr. Tsuru:

Enclosed is an executed original of the Administrative Consent Order regarding the above captioned case. If you have any questions about the Order, please contact me at (312) 886-6797.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah G. Marshall".

Sarah G. Marshall
Chief
Air Enforcement and Compliance Assurance Branch (MI/WI)

Enclosure

cc: Luis Oviedo/C-14J
Bob Hodanbosi, Chief, Ohio EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

In the Matter of:)	EPA-5-16-113(a)-OH-22
)	
Utica East Ohio Midstream LLC)	Proceeding Under Section[s] 113(a)(1)(3) and
Kensington, Ohio)	114(a)(1) of the Clean Air Act, 42 U.S.C.
)	§[§] 7413(a)(1)(3) and 7414(a)(1)
_____)	

Administrative Consent Order

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Order to Utica East Ohio Midstream LLC (UEO) under Sections 113(a)(1)(3) and 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. §§7413(a)(1)(3) and 7414(a)(1).

Statutory and Regulatory Background

2. The CAA establishes a regulatory scheme designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population. 42 U.S.C. § 7401(b)(1).
3. Section 111 of the CAA sets forth a national program for the control of Volatile Organic Compounds (VOCs). 42 U.S.C. § 7411.
4. Under Section 111 of the CAA, 42 U.S.C. § 7411, EPA promulgated the Standards of Performance for New Stationary Sources (NSPS) for Crude Oil and Natural Gas Production, Transmission and Distribution at 40 C.F.R. §§ 5360 through 5430 on September 23, 2013. 78 Fed. Reg. 58435. The NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution (NSPS OOOO) applies to natural gas processing plants.
5. NSPS OOOO, at 40 C.F.R. §60.5365, states you are subject to the applicable provisions of this subpart if you are the owner or operator of one or more of the onshore affected facilities listed

in paragraphs (a) through (g) of this section for which you commence construction, modification or reconstruction after August 23, 2011. This includes 40 C.F.R. §60.5365(d)(3) and (e):

(d)(3) For natural gas processing plants, each pneumatic controller affected facility.

(e) Each storage vessel affected facility.

6. NSPS OOOO, at 40 C.F.R. § 60.5430, defines a “natural gas processing plant (gas plant)” as “any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both.”
7. NSPS OOOO, at 40 C.F.R. § 60.5430, defines a “pneumatic controller” as “an automated instrument used for maintaining a process condition such as liquid level, pressure, delta-pressure, and temperature.”
8. NSPS OOOO, at 40 C.F.R. § 60.5430, defines a “storage vessel” as “a tank or other vessel that contains an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, or produced water, and that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support.”
9. NSPS OOOO, at 40 C.F.R. § 60.5430, defines a Group 2 storage vessel as “a storage vessel, as defined in this section, for which construction, modification, or reconstruction has commenced after April 12, 2013.”
10. NSPS OOOO, at 40 C.F.R. § 60.5365, defines a “storage vessel affected facility” as “a single storage vessel located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment, and has the potential for volatile organic compounds (VOC) emissions equal to or greater than 6 tons per year as determined

according to this section by October 15, 2013 for Group 1 storage vessels and by April 15, 2014, or 30 days after startup (whichever is later) for Group 2 storage vessels.”

11. NSPS OOOO, at 40 C.F.R. § 60.5395(c), states “[i]f you are the owner or operator of a Group 2 storage vessel affected facility, you must comply with paragraphs (d) through (g) of this section.

12. NSPS OOOO, at 40 C.F.R. § 60.5395(d), states in relevant part, “[y]ou must comply with the control requirements of paragraph (d)(1) of this section unless you meet the conditions specified in paragraph (d)(2) of this section.

13. NSPS OOOO, at 40 C.F.R. § 60.5395 (d)(1), states “[r]educe VOC emissions by 95.0 percent according to the schedule specified in (d)(1)(i) and (ii) of this section....

(i) For each Group 2 storage vessel affected facility, you must achieve the required emissions reductions by April 15, 2014, or within 60 days after startup, whichever is later...”

14. NSPS OOOO, at 40 C.F.R. § 60.5395(e)(1), states “if you use a control device to reduce emissions from your storage vessel affected facility, you must equip the storage vessel with a cover that meets the requirements of §60.5411(b) and is connected through a closed vent system that meets the requirements of §60.5411(c), and you must route emissions to a control device that meets the conditions specified in §60.5412(c) and (d). As an alternative to routing the closed vent system to a control device, you may route the closed vent system to a process.”

15. NSPS OOOO, at 40 C.F.R. § 60.5411(b)(3), states that “[e]ach storage vessel thief hatch shall be equipped, maintained and operated with a weighted mechanism or equivalent, to ensure that the lid remains properly seated.”

16. NSPS OOOO, 40 C.F.R. § 60.5411(c)(1), states “[y]ou must design the closed vent system to route all gases, vapors, and fumes emitted from the material in the storage vessel to a control device that meets the requirements specified in §60.5412(c) and (d), or to a process.”
17. NSPS OOOO, at 40 C.F.R. §60.5400(a), states an onshore natural gas processing plant must comply with the equipment leak standard requirements of specific portions of Subpart VVa—Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006 (Subpart VVa) at 40 C.F.R. §§60.482-1a(a), (b), and (d), 60.482-2a, and 60.482-4a through 60.482-11a, except as provided in §60.5401.
18. NSPS OOOO, at 40 C.F.R. §60.5400(b), states that as an alternative to 40 C.F.R. §60.5400(a), a natural gas processing plant may elect to comply with the requirements of §§60.483-1a and 60.483-2a.
19. NSPS OOOO, 40 C.F.R. § 60.5400(d), states that a facility “must comply with the provisions of §60.485a of this part except as provided in paragraph (f) of this section.”
20. NSPS OOOO, at 40 C.F.R. § 60.5400(e), states that a facility “must comply with the provisions of §§60.486a and 60.487a of this part except as provided in §§60.5401, 60.5421, and 60.5422 of this part.”
21. NSPS OOOO, at 40 C.F.R. § 60.5400(f), states a facility “must use the following provision instead of §60.485a(d)(1): Each piece of equipment is presumed to be in VOC service or in wet gas service unless an owner or operator demonstrates that the piece of equipment is not in VOC service or in wet gas service.”

22. NSPS OOOO, 40 C.F.R. § 60.482-1a(a), states “[e]ach owner or operator subject to the provisions of this subpart shall demonstrate compliance with the requirements of §§60.482-1a through 60.482-10a or §60.480a(e) for all equipment within 180 days of initial startup.”
23. NSPS OOOO, 40 C.F.R. § 60.482-1a(b), states “[c]ompliance with §§60.482-1a to 60.482-10a will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in §60.485a.”
24. NSPS OOOO, 40 C.F.R. § 60.482-2a (a)(1), states “[e]ach pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in §60.485a(b), except as provided in §60.482-1a(c) and (f) and paragraphs (d), (e), and (f) of this section. A pump that begins operation in light liquid service after the initial startup date for the process unit must be monitored for the first time within 30 days after the end of its startup period.”
25. NSPS OOOO, 40 C.F.R. § 60.482-11a(a), states “[t]he owner or operator shall initially monitor all connectors in the process unit for leaks by the later of either 12 months after the compliance date or 12 months after initial startup.”
26. NSPS OOOO, 40 C.F.R. § 60.482-11a(d), states that “when a leak is detected pursuant to paragraphs (a) and (b) of this section, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in §60.482-9a. A first attempt at repair as defined in this subpart shall be made no later than 5 calendar days after the leak is detected” from a connector.
27. NSPS OOOO, 40 C.F.R. § 60.482-7a(d)(2), states that “a first attempt at repair shall be made no later than 5 calendar days after each leak is detected” from a valve.
28. NSPS OOOO, 40 C.F.R. § 60.482-3a(g)(2), states that “a first attempt at repair shall be made no later than 5 calendar days after each leak is detected” from a compressor.

29. NSPS OOOO, 40 C.F.R. § 60.482-6a(a)(1), states that “each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in §60.482-1a(c) and paragraphs (d) and (e) of this section.”
30. NSPS OOOO, 40 C.F.R. § 60.482-6a(a)(2), states that “the cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line.”
31. NSPS OOOO, 40 C.F.R. § 60.482-7a(a)(1), states that “each valve shall be monitored monthly to detect leaks by the methods specified in §60.485a(b) and shall comply with paragraphs (b) through (e) of this section.”
32. NSPS OOOO, 40 C.F.R. § 60.482-7a(a)(2), states that “a valve that begins operation in gas/vapor service or light liquid service after the initial startup date for the process unit must be monitored according to paragraphs (a)(2)(i) or (ii).”
33. NSPS OOOO, at 40 C.F.R. § 60.482-7a(a)(2)(i), states that a facility must “monitor the valve as in paragraph (a)(1) of this section. The valve must be monitored for the first time within 30 days after the end of its startup period to ensure proper installation.”
34. The NSPS Appendix A, at 40 C.F.R. Part 60, Method 21 §§ 8.3.1 and 8.3.1.1, sets forth the technique which must be used to determine if there is a leak from a valve
35. NSPS VVa, at 40 C.F.R. § 60.485a (b), states “[t]he owner or operator shall determine compliance with the standards in §§60.482-1a through 60.482-11a, 60.483a, and 60.484a as follows: (1) Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 of appendix A-7 of this part.”

36. After the effective date of any emission standard, limitation, or regulation promulgated pursuant to Section 112 of the CAA, no person may operate a source in violation of such standard, limitation, or regulation. 42 U.S.C. § 7412(i)(3).
37. Under Section 113(a)(3) of the CAA, 42 U.S.C. § 7413(a)(3), the Administrator of EPA may issue an order requiring compliance to any person who has violated or is violating the NSPS OOOO regulations. The Administrator has delegated this authority to the Director of the Air and Radiation Division.
38. The Administrator of EPA may require any person who owns or operates an emission source to make reports; install, use and maintain monitoring equipment; sample emissions; provide information required by the Administrator under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division.

Findings

39. UEO owns and operates the Kensington Gas Processing Plant (KGP), an onshore natural gas processing plant, at 11543 State Route 644, Kensington, Ohio, which removes natural gas liquids from field gas.
40. UEO KGP is subject to the requirements in NSPS OOOO, and those provisions of Subpart VVa that are referenced in NSPS OOOO.
41. UEO owns or operates an “emission source” within the meaning of Section 114 (a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). Therefore, UEO is subject to the requirements of Section 114(a)(1).
42. On April 9, 2015, EPA issued to UEO a finding of violation alleging that it violated the NSPS OOOO by failing to do the following: include all equipment into their Leak Detection

and Repair (LDAR) program; cap, plug, blind flange, or second-valve each open-ended valve or line; seal each cap from all open-ended after valves or lines; perform EPA Method 21 on all valves; monitor new pumps and valves timely after its startup date; make first attempt at repairs on valves, connectors and pumps within 5 days; and capture and control all tanks emissions as required in NSPS OOOO.

43. On May 21, 2015, representatives of UEO and EPA discussed the April 9, 2015 finding of violation.
44. EPA alleges that UEO failed to perform Method 21 properly on 25 insulated valves, in violation of 40 C.F.R. § 60.482-7a(a)(1) (and by reference 60.485(b)) and 40 C.F.R. Part 60 Method 21 §§ 8.3.1 and 8.3.1.1.
45. EPA alleges that UEO failed to identify and monitor 18 valves subject to the standards set forth at 40 C.F.R. §§ 60.482-1a to 60.482-10a, in violation of 40 C.F.R. §§ 60.632(e), 60.635(a) (and by reference § 60.486(e)(1)).
46. EPA alleges that UEO failed to perform initial monthly monitoring of all valves within 30 days in Trains 1, 2, and 3 after the initial startup period in violation of 40 C.F.R. §§ 482-7a(a)(2) and 482-7a(a)(1).
47. EPA alleges that UEO failed to cap, blind flange, plug, or second valve each open-ended valve or line in paragraph 42, in violation of 40 C.F.R. 60.482-6a(a)(1).
48. EPA alleges that UEO failed to seal each open-ended valve or line in violation of 40 C.F.R. § 60.482-6a(a)(2).
49. EPA alleges that UEO failed to make timely first attempts at repairs within 5 days on two valves listed in violation of § 60.482-7a(d)(2).

50. EPA alleges that UEO failed to make timely first attempts at repairs within 5 days on three connectors in violation of § 60.482-11a(d).
51. EPA alleges that UEO failed to make timely first attempt at repairs within 5 days on one compressor in violation of § 60.482-3a(g)(2).
52. EPA alleges that UEO failed to reduce VOC emissions by 95 percent at its P003 and T004 tanks within 60 days of startup in violation of 40 C.F.R. § 60.5395(d)(1).
53. EPA alleges that UEO failed to equip, maintain, and operate each storage vessel thief (pressure relief) hatch on tank P003 with a properly weighted mechanism or equivalent, and maintain a hatch gasket on T004 to ensure that the lid remains properly seated, in violation of 40 C.F.R. § 60.5411(b)(3).
54. EPA alleges that UEO failed to install its closed vent system connected to tank P003 and T004 to route all gases, vapors, and fumes emitted from the material in the storage vessel to a control device, in violation of 40 C.F.R. § 60.5411(c)(1).

Compliance Program

55. By no later than three months after the Effective Date of this Order, UEO shall develop a document that describes: (i) the LDAR program as it applies to equipment at the natural gas processing plant that is subject to the LDAR requirements referenced in NSPS OOOO and VVa (*e.g.*, applicability of regulations to process units and/or specific equipment; leak definitions; monitoring frequencies); (ii) a tracking program (*e.g.*, Management of Change) that ensures that new pieces of equipment added to the natural gas processing plant for any reason are, as applicable, integrated into the LDAR program and that pieces of equipment that are taken out of service are, as applicable, removed from the LDAR program; (iii) the roles and responsibilities of all employee and contractor personnel assigned to LDAR functions at

the natural gas processing plant; and (iv) how the number of personnel dedicated to LDAR functions is sufficient to satisfy the requirements of the LDAR program.

56. Commencing by no later than the first full calendar quarter after the Effective Date of this Order, at times that are not announced to the LDAR monitoring technician(s), an LDAR-trained employee or contractor of UEO, who does not serve on a routine basis as an LDAR monitoring technician at the Facility, shall undertake the following no less than once per calendar quarter for the period of one year at the natural gas processing plant:

- a. Verify that equipment was monitored at the appropriate frequency under applicable LDAR regulations;
- b. Verify that proper documentation and sign-offs have been recorded for all equipment placed on the delay of repair list;
- c. Ensure that repairs have been performed in the required periods under applicable LDAR regulations;
- d. Review monitoring data and equipment counts (*e.g.*, number of pieces of equipment monitored per day) for feasibility and unusual trends;
- e. Verify that proper calibration records and monitoring instrument maintenance information are maintained;
- f. Verify that other LDAR program records are maintained as required; and
- g. Observe in the field each LDAR monitoring technician who is conducting leak detection monitoring to ensure that monitoring during the quarterly period is being conducted as required.

UEO promptly shall correct any deficiencies detected or observed. UEO shall maintain a log that: (i) records the date and time that the reviews, verifications, and observations required by this Paragraph are undertaken; and (ii) describes the nature and timing of any corrective actions taken.

57. By no later than 180 days of the Effective Date of this Order, UEO must conduct a third-party LDAR audit at the natural gas processing plant. The audit shall include: (i) reviewing

compliance with all applicable LDAR regulations, including all applicable LDAR requirements related to valves, connectors, pumps, agitators, and open-ended lines; (ii) reviewing and/or verifying the same items that are required to be reviewed and/or verified in Subparagraphs 56.a – 56.f; (iii) reviewing whether any pieces of equipment that are required to be in the LDAR program are not included; and (iv) “comparative monitoring” as described in Paragraph 58.

58. Comparative Monitoring. Comparative monitoring conducted during the LDAR audit required by Paragraph 57 shall be undertaken as follows:

- a. Calculating a Comparative Monitoring Audit Leak Percentage. Equipment shall be monitored in order to calculate a leak percentage for each process unit at the natural gas processing plant, broken down by equipment type (*i.e.*, valves, pumps, agitators, and connectors). For descriptive purposes under this section, the monitoring that takes place during the audit shall be called “Comparative Monitoring” and the leak percentages derived from the Comparative Monitoring shall be called the “Comparative Monitoring Audit Leak Percentages.” In undertaking Comparative Monitoring, UEO shall not be required to monitor every component in the Unit.
- b. Calculating the Historic, Average Leak Percentage from Prior Periodic Monitoring Events. The historic, average leak percentage from prior periodic monitoring events, broken down by equipment type (*i.e.*, valves (excluding pressure relief valves), pumps, agitators, and connectors) shall be calculated. The following number of complete monitoring periods immediately preceding the Comparative Monitoring shall be used for this purpose: valves - 4 periods; pumps and agitators - 12 periods; and connectors – 2 periods.
- c. Calculating the Comparative Monitoring Leak Ratio. For each type of equipment, the ratio of the Comparative Monitoring Audit Leak Percentage from Subparagraph 58.a to the historic, average leak percentage from Subparagraph 58.b shall be calculated. This ratio shall be called the “Comparative Monitoring Leak Ratio.” If the denominator in this calculation is “zero,” it shall be assumed (for purposes of this calculation but not for any other purpose under this Order or under any applicable laws and regulations) that one leaking piece of equipment was found in the Unit through routine monitoring during the 12-month period before the Comparative Monitoring

59. Corrective Action Plan (“CAP”)

a. Requirements of a CAP. By no later than the date that is one month after the LDAR audit completion date, UEO shall develop a preliminary CAP if: (i) the results of the LDAR audit identify any deficiencies; or (ii) a Comparative Monitoring Leak Ratio calculated pursuant to Subparagraph 58.c is 3.0 or higher *and* the Comparative Monitoring Audit Leak Percentage calculated pursuant to Subparagraph 58.a is greater than or equal to 0.5 percent. The preliminary CAP shall describe the actions that UEO has taken or shall take to address: (i) the deficiencies and/or (ii) the causes of a Comparative Monitoring Leak Ratio that is 3.0 or higher (but only if the Comparative Monitoring Audit Leak Percentage is at or above 0.5 percent). UEO shall include a schedule by which actions that have not yet been completed shall be completed. UEO promptly shall complete each corrective action item with the goal of completing each action within the date that is three months after the LDAR audit completion date. If any action is not completed or not expected to be completed within three months after the LDAR audit completion date, UEO shall explain the reasons and propose a schedule for prompt completion in the final CAP to be submitted under Subparagraph 59.b.

b. Submission of the Final CAP to EPA. By no later than the date that is four months after the LDAR audit completion date, UEO shall submit the final CAP to EPA, together with a certification of the completion of each item of corrective action. If any action is not completed within three months after the LDAR audit completion date, UEO shall explain the reasons, together with a proposed schedule for prompt completion. UEO shall submit a supplemental certification of completion by no later than one month after completing all actions.

60. By no later than 270 days of the Effective Date of this Order, UEO will undertake an additional periodic monitoring event of all valves at the natural gas processing plant, from the regulatory required periodic monitoring.
61. By no later than 90 days of the Effective Date of this Order, UEO will incorporate all thief hatches from all storage tanks subject to NSPS OOOO into the facilities LDAR program as equipment requiring quarterly periodic EPA Reference Method 21 monitoring.
62. UEO must send all reports required by this Order to:

Attention: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

General Provisions

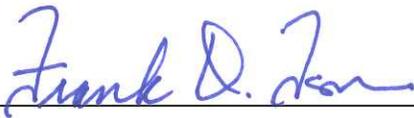
63. UEO is entering into this Order to settle EPA's allegations. By entering into this Order, the Order itself, taking any action in accordance with this Order and/or any work performed at KGP does not constitute an admission of any liability, wrongdoing, or misconduct on the part of UEO, its agents, members, managers, officers, directors, employees, servants, successors, assigns or related corporate entities. UEO neither admits nor denies the factual allegations and findings in this Order or the FOV, but UEO agrees to the terms of this Order and waives any right to contest or appeal the issuance of this Order.
64. This Order does not affect UEO's responsibility to comply with other federal, state, and local laws.
65. This Order does not restrict EPA's authority to Section 111 of the CAA or any other section of the CAA.

66. Nothing in this Order limits the EPA's authority to seek appropriate relief, including penalties, under Section 113 of the CAA, 42 U.S.C. § 7413, for UEO's violation of the NSPS OOOO.
67. Failure to comply with this Order may subject UEO to penalties of up to \$37,500 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.
68. The terms of this Order are binding on UEO, its assignees and successors. Prior to the termination of this Order, UEO must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.
69. UEO may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information they submit to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If UEO fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.
70. This order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information by an agency from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts, please furnish an electronic copy on physical media such as compact disk, flash drive or other similar item. If it is not possible to submit the information electronically, submit the response to this Order without staples; paper clips and binder clips, however, are acceptable.

71. EPA may use any information submitted under this Order in an administrative, civil judicial or criminal action.

72. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate one year from the effective date, provided that UEO has complied with all terms of the Order throughout its duration.

Date



Frank D. Tsuru, ~~Manager~~ *Attorney-in-Fact*
Utica East Ohio Midstream LLC

6/30/16

Date



Edward Nam, PhD
Acting Director
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent the Administrative Consent Order, EPA-5-16-113(a)-OH-22, by certified mail, return receipt requested, to:

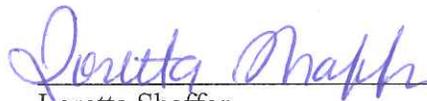
Frank D. Tsuru, Manager
Utica East Ohio Midstream
LLC
11543 State Route 644
Kensington, Ohio 44427

I also certify that I sent a copy of the Administrative Consent Order, EPA-5-16-113(a)-OH-22, by E- mail to:

Bob Hodanbosi, Chief
bob.hodanbosi@epa.ohio.gov

Ed Fasko, Ohio EPA
Ed.fasko@epa.ohio.gov

On the 1 day of July 2016.



Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT
NUMBER:

7009 1680 0000 7673 8071