



REGION 5

CHICAGO, IL 60604

VIA ELECTRONIC MAIL
DELIVERY RECEIPT REQUESTED

Leslie Gearhart, Regulatory Compliance Manager
Pin Oak Energy Partners, LLC
388 S Main St. STE 401
Akron, Ohio 44311
leslie.gearhart@pinoakep.com

Re: Notice and Finding of Violation
Pin Oak Energy Partners, LLC
Akron, Ohio

Dear Leslie Gearhart:

The U.S. Environmental Protection Agency is issuing the enclosed Notice and Finding of Violation (NOV/FOV) to Pin Oak Energy Partners ("Pin Oak" or "you") under Section 113(a) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a). We find that you are violating the New Source Performance Standards (NSPS) for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015 (Subpart OOOO), the NSPS for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (Subpart OOOOa), and terms of your Ohio Permits to Install and Operate (PTIOs) at your Ohio facilities listed in Appendix A to the NOV/FOV.

Section 113 of the CAA gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV/FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Jacob Herbers. You may email him at Herbers.Jacob@epa.gov to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

For legal questions, please contact Jolie McLaughlin, Associate Regional Counsel, at mclaughlin.jolie@epa.gov.

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Constantinos Loukeris
Acting Supervisor, Air Enforcement and Compliance Assurance Section WI/MI

cc:

Joshua Koch
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Devan Roof
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Pin Oak Energy Partners, LLC

Akron, Ohio

Proceedings Pursuant to
Section 113(a)(1) and (3) of the
the Clean Air Act, 42 U.S.C.
§ 7413(a)(1) and (3)

NOTICE AND FINDING OF VIOLATION

EPA-5-24-OH-01

NOTICE AND FINDING OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice and Finding of Violation (NOV/FOV) under Section 113(a)(1) and (3) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(1) and (3). Based on available information and as explained below, EPA finds that Pin Oak Energy Partners, LLC (Pin Oak) is violating the Ohio State Implementation Plan (SIP) and Section 111(e) of the CAA, 42 U.S.C. § 7411(e). Specifically, Pin Oak is violating the New Source Performance Standards (NSPS) for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011, and on or Before September 18, 2015, at 40 C.F.R. Part 60, Subpart OOOO (Subpart OOOO); the NSPS for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, at 40 C.F.R. Part 60, Subpart OOOOa (Subpart OOOOa); and terms of Pin Oak's Ohio Permits to Install and Operate (PTIOs) issued under the Ohio SIP, as follows:

Statutory and Regulatory Authority

1. The CAA, and the regulations promulgated thereunder, establish a statutory and regulatory scheme designed to, among other things, 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. *See* 40 U.S.C. § 7401(b)(1).

2. Section 111(b) of the CAA, 42 U.S.C. § 7411(e), requires EPA to promulgate emission standards for new stationary sources falling within industrial categories that significantly contribute to air pollution.

The New Source Performance Standards General Provisions

3. Pursuant to Section 111(b) of the CAA, EPA promulgated the NSPS General Provisions, at 40 C.F.R. Subpart A, which apply to owners and operators of any stationary source that contains an affected facility, the construction or modification of which commenced after the date of publication of any standard applicable to that facility.

4. The NSPS General Provisions, at 40 C.F.R. § 60.2, define “owner or operator” to mean “any person who owns, leases, operates, controls, or supervises an affected facility or a stationary source of which an affected facility is a part.”

NSPS Subpart OOOO

5. Pursuant to Section 111(b) of the CAA, EPA promulgated NSPS Subpart OOOO, at 60 C.F.R. Part 60, Subpart OOOO, which establishes emissions standards and compliance schedules for the control of volatile organic compound (VOC) and sulfur dioxide emissions from affected facilities in the crude oil and natural gas production source category that commenced construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015.

6. Owners and operators of one or more affected facilities that commenced construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015, are subject to the applicable provisions of Subpart OOOO. 40 C.F.R. § 5365(e).

7. Under NSPS Subpart OOOO, “affected facilities” include any “storage vessel affected facility.” 60 C.F.R. § 60.5365(e).

8. Subpart OOOO, at 40 C.F.R. § 60.5430, defines “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 non-earthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support.

9. Subpart OOOO, at 40 C.F.R. § 60.5365(e), provides that a single storage vessel is a “storage vessel affected facility” if a properly performed emission determination indicates that the storage vessel has the potential for VOC emissions equal to or greater than six tons per year. The potential for VOC emissions from a storage vessel must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emission determination deadline specified in 40 C.F.R. § 60.5365. The determination may take into account requirements under a legally and practicably enforceable limit in an operating permit or other requirement established under a federal, state, local, or tribal authority.

10. Subpart OOOO, at 40 C.F.R. § 60.5365(e)(2), provides that a storage vessel affected facility that subsequently has its potential for VOC emissions decrease to less than 6 tons per year shall remain an affected facility under this subpart.

11. Subpart OOOO requires the owner or operator of a storage vessel affected facility to comply with the following emission control requirements:

1. The owner or operator of a storage vessel affected facility must either: (i) reduce VOC emissions from the storage vessel by 95.0 percent; or (ii) maintain the uncontrolled actual VOC emissions from the storage vessel at less than four tons per year without considering control. See 40 C.F.R. § 60.5395(d)(1)-(2).
2. For an owner or operator of a storage vessel electing to comply with the 95.0 percent emission reduction requirement in 40 C.F.R. § 60.5395(d)(1), the required emission

reduction must be achieved by control requirements that include, per 40 C.F.R. § 60.5395(e):

- a. equipping the storage vessel with a cover that meets the requirements of 40 C.F.R. § 60.5411(b); and
- b. connecting the storage vessel and cover to a closed vent system that meets the requirements of 40 C.F.R. § 60.5411(c) and either routing the emissions to a control device that meets the conditions specified in 40 C.F.R. § 60.5412(c)-(d), or routing the closed vent system to a process.

12. Subpart OOOO, at 40 C.F.R. § 60.5411(b)(1)-(3), requires owners and operators of storage vessel affected facilities to ensure that covers on storage vessels meet the following requirements: (1) the cover and all openings on the cover shall form a continuous impermeable barrier over the entire surface area of the liquid in the vessel; (2) each cover opening shall be secured in a closed, sealed position except to add or remove material from the unit, to inspect or sample the material in the unit, to inspect, maintain, repair, or replace equipment in the unit, or to vent material through a closed-vent system; and (3) each storage vessel thief hatch shall be equipped, maintained, and operated with a weighted mechanism or equivalent, to ensure the lid remains properly seated.

13. Subpart OOOO, at 40 C.F.R. § 60.5415(e), requires owners and operators of storage vessel affected facilities to demonstrate continuous compliance with Subpart OOOO for each storage vessel by reducing VOC emissions as specified in 40 C.F.R. § 60.5395(d), and by ensuring that any control device that is installed meets the applicable requirements of Subpart OOOO.

14. Subpart OOOO, at 40 C.F.R. § 60.5416(c), requires owners and operators of storage vessel affected facilities to conduct an inspection of each cover and closed vent system at least once every calendar month, and to maintain records of the inspection results.

15. Subpart OOOO, at 40 C.F.R. § 60.5420(b), requires owners and operators of affected facilities to submit annual reports containing the information specified in 40 C.F.R. § 60.5420(b)(1)-(8).

16. Subpart OOOO, at 40 C.F.R. § 60.5420(c), requires owners and operators of affected facilities to maintain all records required by the subpart for at least five years. These records include, but are not limited to, records of each VOC emissions determination for each storage vessel affected facility made under 40 C.F.R. § 60.5365(e), including identification of the model or calculation methodology used to calculate the VOC emission rate, records of each cover inspection, records of inspections using section 11 of Method 22, and records related to pneumatic controllers. See 40 C.F.R. § 60.5420(c)(4), (5)(ii), (6), (7), (13).

17. Subpart OOOO, at 40 C.F.R. § 60.5370(b), requires that at all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any storage vessel affected facility in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to EPA which may include but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

NSPS Subpart OOOOa

18. Pursuant to Section 111(b) of the CAA, EPA promulgated NSPS Subpart OOOOa, at 60 C.F.R. Part 60, Subpart OOOOa, which establishes emission standards for the control of emissions of VOCs, sulfur dioxide, and greenhouse gases in the form of methane from affected facilities in the crude oil and natural gas production source category that commenced construction, modification, or reconstruction after September 18, 2015.

19. Owners and operators of one or more affected facilities that commenced construction, modification, or reconstruction after September 18, 2015, are subject to the applicable provisions of Subpart OOOOa. 40 C.F.R. § 5365a.

20. Under NSPS Subpart OOOOa, “affected facilities” include any “storage vessel affected facility.” 60 C.F.R. § 60.5365a(e).

21. Subpart OOOOa, at 40 C.F.R. § 60.5430a, defines “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 non-earthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provide structural support.

22. Subpart OOOOa, at 40 C.F.R. § 60.5365a(e), provides that a storage vessel is a “storage vessel affected facility” if a properly performed emission determination indicates that the storage vessel has the potential for VOC emissions equal to or greater than six tons per year. The potential for VOC emissions must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to August 2, 2016, or within 60 days after startup (whichever was later). The determination may take into account requirements under a legally and practicably enforceable limit in an operating permit or other requirement established under a federal, state, local, or tribal authority.

23. Subpart OOOOa, at 40 C.F.R. § 60.5365a(e)(4), provides that a storage vessel affected facility that subsequently has its potential for VOC emissions decrease to less than six tons per year shall remain an affected facility under this subpart.

24. Subpart OOOOa requires the owner or operator of a storage vessel affected facility to comply with the following emission control requirements:

- a. The owner or operator of a storage vessel affected facility must either: (i) reduce VOC emissions from the storage vessel by 95.0 percent within 60 days after startup; or (ii) maintain the uncontrolled actual VOC emissions from the storage vessel at less than four tons per year without considering control. See 40 C.F.R. § 60.5395a(a)(2)-(3).
- b. For a storage vessel electing to comply with the 95.0 percent emission reduction requirement in 40 C.F.R. § 60.5395a(a)(2), the required emission reduction must be achieved by control requirements that include, per 40 C.F.R. § 60.5395a(b):
 - i. equipping the storage vessel with a cover that meets the requirements of 40 C.F.R. § 60.5411a(b); and

- ii. connecting the storage vessel to a closed vent system that meets the requirements of 40 C.F.R. § 60.5411a(c) and (d) and either routing the emissions to a control device that meets the conditions specified in 40 C.F.R. § 60.5412a(d), or routing the closed vent system to a process.

25. Subpart OOOOa, at 40 C.F.R. § 60.5411a(b)(1)-(3), requires owners and operators of storage vessel affected facilities to ensure that covers on storage vessels meet the following requirements: (1) the cover and all openings on the cover shall form a continuous impermeable barrier over the entire surface area of the liquid in the storage vessel; (2) each cover opening shall be secured in a closed, sealed position except to add or remove material from the unit, to inspect or sample the material in the unit, to inspect, maintain, repair, or replace equipment in the unit, or to vent material through a closed-vent system; and (3) each storage vessel thief hatch shall be equipped, maintained, and operated with a weighted mechanism or equivalent, to ensure the lid remains properly seated and sealed under normal operating conditions, including such times when working, standing/breathing, and flash emissions may be generated.

26. Subpart OOOOa, at 40 C.F.R. § 60.5415a(e), requires owners and operators of storage vessel affected facilities to demonstrate continuous compliance with Subpart OOOO for each storage vessel by reducing VOC emissions as specified in 40 C.F.R. § 60.5395a(a)(2), and by ensuring that any control device that is installed meets the applicable requirements of Subpart OOOOa.

27. Subpart OOOOa, at 40 C.F.R. § 60.5416a(c), requires owners and operators of storage vessel affected facilities to conduct an inspection of each cover and closed vent system at least once every calendar month, and to maintain records of the inspection results.

28. Subpart OOOOa, at 40 C.F.R. § 60.5420a(b), requires owners and operators of affected facilities to submit annual reports containing the information specified in 40 C.F.R. § 60.5420a(b)(1)-(8) and (12).

29. Subpart OOOOa, at 40 C.F.R. § 60.5420a(c), requires owners and operators of affected facilities to maintain all records required by the subpart for at least five years. These records include, but are not limited to, records of each VOC emissions determination for each storage vessel affected facility made under 40 C.F.R. § 60.5365a(e), including identification of the model or calculation methodology used to calculate the VOC emission rate, records of each closed vent system inspection, records of each cover inspection, records of inspections using section 11 of Method 22, the fugitive emissions monitoring plan, records of each fugitive emissions monitoring survey, and records related to pneumatic controllers. See 40 C.F.R. § 60.5420a(c)(4), (5)(ii), (6), (7), (13), (15)(vi)-(vii).

30. Subpart OOOOa provides that the “collection of fugitive emission components” at a “well site” is an “affected facility,” subject to Subpart OOOOa. 40 C.F.R. § 5365a(i).

31. A “well site” is one or more surface sites that are constructed for the drilling and subsequent operation of any oil, natural gas, or injection well. 40 C.F.R. § 60.5430a.

32. A “fugitive emissions component” is any component that has the potential to emit fugitive emissions of VOCs at a well site or compressor station, including valves, connectors, pressure relief devices, open-ended lines, flanges, covers and closed vent systems not subject to 40 C.F.R § 60.5411 or

40 C.F.R. § 60.5411a, thief hatches or other openings on a controlled storage vessel not subject to 40 C.F.R. § 60.5395 or 40 C.F.R. § 60.5395a, compressors, instruments, and meters. 40 C.F.R. § 60.5430a.

33. Subpart OOOOa, at 40 C.F.R. § 60.5397a(b), requires owners and operators of collections of fugitive components at a well site to develop an emissions monitoring plan in accordance with 40 C.F.R. § 60.5397a(c)-(d) that covers the collection of fugitive emissions components within each company-defined area. The emissions monitoring plan must include, but is not limited to, the following:

- a. An initial monitoring survey conducted within 90 days of the startup of production for each collection of fugitive emissions components, and monitoring surveys conducted at least semiannually after the initial survey. Consecutive semiannual monitoring surveys must be conducted at least four months apart and no more than seven months apart. See 40 C.F.R. § 60.5397a(f) and (g); and
- b. A technique for determining fugitive emissions, which must be either Method 21 of Appendix A-7 to this part meeting the requirements of 40 C.F.R. § 60.5397a(c)(8), or optical gas imaging meeting the requirements of 40 C.F.R. § 60.5397a(c)(7)(i)-(vii). See 40 C.F.R. § 60.5397a(c)(2).

34. Subpart OOOOa, at 40 C.F.R. § 60.5370a(b), requires that at all times, including periods of startup, shutdown, and malfunction, owners and operators shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance practices are being used will be based on information available to EPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 C.F.R. § 60.8(c) do not apply to Subpart OOOOa.

The Ohio SIP

35. Pursuant to Section 110(a)(1) of the CAA, 42 U.S.C. § 7410(a)(1), each state is responsible for adopting and submitting to EPA for approval an implementation plan that provides for the implementation, maintenance, and enforcement of National Ambient Air Quality Standards (NAAQS) for particular pollutants, including ground-level ozone.

36. Under Section 110(a)(2) of the CAA, 42 U.S.C. § 7410(a)(2), each SIP must include enforceable emission limitations and other control measures, means, or techniques, as well as schedules for compliance, as may be necessary to meet applicable requirements, and must include a permit program to provide for the enforcement of these limitations, measures, and schedules as necessary to assure the NAAQS are achieved.

37. Upon EPA's approval of a SIP, the plans become independently enforceable by the Federal Government, as stated under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1). Thus, EPA may take enforcement action if EPA finds that any person is in violation of any SIP requirements, including conditions contained in permits issued pursuant to a SIP.

38. EPA has approved various provisions of the Ohio Administrative Code (Ohio Admin. Code) as part of the Ohio SIP, including Ohio Admin. Code §§ 3745-31-02 and 3745-31-29. 78 Fed. Reg. 11,748 (Feb. 20, 2013); 80 Fed. Reg. 36,477 (June 25, 2015); 40 C.F.R. § 52.1870(c).

39. The Ohio SIP, at Ohio Admin. Code § 3745-31-02, establishes requirements for installation, modification, and operation of new and existing air contaminant sources via a program for sources to obtain a Permit-to-Install (PTI) or a Permit-to-Install-and-Operate (PTIO).

40. The Ohio SIP, at Ohio Admin. Code § 3745-31-29, allows the Director of the Ohio Environmental Protection Agency (OEPA) to develop model general PTIs and PTIOs for categories of air contaminant sources, including oil and gas well site production sources.

The GP 12.1 and 12.2 Permit Program for Oil and Gas Well-Site Production Operations

41. On January 31, 2012, OEPA finalized a model general PTIO for oil and gas well production operations (GP 12). In April 2014, OEPA revised the GP 12 to incorporate Subpart OOOO requirements and to create two different versions of the model permit (GP 12.1 and GP 12.2) for facilities that meet different qualifying criteria.^{1, 2}

42. GP PTIO 12.1 and GP PTIO 12.2 expressly incorporate relevant requirements of Subparts OOOO and OOOOa. GP PTIO 12.1 and GP PTIO 12.2 supplement, but do not supplant, the requirements of Subpart OOOO for storage vessels at oil and gas well production facilities.

43. GP PTIO 12.1 and GP PTIO 12.2, at Condition A. 1, state:

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).

44. GP PTIO 12.1 and GP PTIO 12.2, at Condition A. 13, state:

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 OEPA 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.

¹ The different versions pertain to capacities of the flare and engines at the well pad. With respect to the general permit language cited in this NOV/FOV, both versions of the general model permit contain identical language, and so the differences in permit versions are not relevant to this NOV/FOV.

² The location of the GP PTIO Permit Conditions cited below may vary across individual permits issued to Pin Oak facilities. The citations below are to the template GP PTIO 12.1 and GP PTIO 12.2, available on OEPA's website at https://epa.ohio.gov/static/Portals/27/oil%20and%20gas/GP12.1_PTIOA20140403final.pdf and https://epa.ohio.gov/static/Portals/27/oil%20and%20gas/GP12.2_PTIOA20140403final.pdf.

45. GP PTIO 12.1 and GP PTIO 12.2 contain provisions for equipment and pipeline leaks at Condition C. 5, which states, at Condition C. 5. a) (1), that all of the provisions of Section C. 5. are federally enforceable for the purpose of a permit-to-install.

46. GP PTIO 12.1 and GP PTIO 12.2, at Condition C. 5. c) (2), state, in pertinent part:

The permittee shall develop and implement a leak detection and repair program designed to monitor and repair leaks from ancillary equipment covered by this permit, including each pump, compressor, pressure relief device, connector, valve, flange, vent, cover, any bypass in the closed vent system, and each storage vessel. . . . Leaks shall be detected by the use of either a "Forward Looking Infra Red" (FLIR) camera or an analyzer meeting U.S. EPA Method 21 of 40 CFR Part 60, Appendix A. . . . An initial monitoring shall be completed within 90 days of startup and quarterly thereafter for a period of four consecutive quarters (1 year). . . . If following the initial four consecutive quarters, less than or equal to 2.0% of the ancillary equipment are determined to be leaking during the most recent quarterly monitoring event, then the frequency of monitoring can be reduced to semiannual. . . . If following two consecutive semi-annual periods, less than 2.0% of the ancillary equipment are determined to be leaking during the most recent semi-annual monitoring event, then the frequency of the monitoring can be reduced to annual. . . . If more than or equal to 2.0% of the ancillary equipment are determined to be leaking during any one of the semi-annual or annual monitoring events, then the frequency of monitoring shall be returned to quarterly.

47. GP PTIO 12.1 and GP PTIO 12.2, at Condition C. 5. d) (1) b., state:

The following records shall be maintained for each natural gas-driven pneumatic controller installed at the facility after 8/23/11:

- i. records of the date installed or reconstructed, the location and/or equipment each controller is servicing, and the manufacturer specifications;*
- ii. if applicable, the records needed to demonstrate why the operations require the use of a pneumatic controller with a bleed rate greater than 6 scf/hr and the functional basis for requiring the higher bleed rate; or*
- iii. if installed on or after 10/15/13, records of the manufacturer's specification indicating that the pneumatic controller is designed to have a natural gas bleed rate less than or equal to 6 scf/hr; or*
- iv. if the pneumatic controller has been installed on or after 8/23/11 and before 10/15/13, the manufacturer's designed bleed rate; and*
- v. where a higher bleed rate has not been demonstrated to be needed, the records of any deviations from the 6 scf/hr bleed rate for each pneumatic controller installed on or after 10/15/13.*

48. GP PTIO 12.1 and GP PTIO 12.2, at Conditions C. 5. d) (2) b., state:

The following information shall be recorded during each leak inspection:

- i. the date the inspection was conducted;*
- ii. the name of the employee conducting the leak check;*
- iii. the identification of any component that was determined to be leaking;*

- iv. *the date the first attempt to repair the component was made;*
- v. *the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);*
- vi. *the date the component was repaired and determined to no longer be leaking;*
- vii. *the total number of components that are leaking; and*
- viii. *the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.*

49. GP PTIO 12.1 and GP PTIO 12.2, at Conditions C. 5. e) (1) and C. 6. e) (1), and Condition C. 7. e) (1),³ state, in pertinent part:

The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA (1) 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 . . .

50. GP PTIO 12.1 and GP PTIO 12.2 contain provisions for flash vessels and storage vessels at Condition C. 6, which states, at Condition C. 6. a) (1), that all of the provisions of Section C. 6. are federally enforceable for the purpose of a permit-to-install.

51. GP PTIO 12.1 and GP PTIO 12.2, at Condition C. 6. b) (1) c., state:

The facility must calculate the potential for VOC emissions for each single storage vessel using an accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to 10/15/13 for Group 1 storage vessels, or determined for a 30-day period of production prior to 4/15/14 or 30 days after startup for Group 2 storage vessels**.⁴*

Where these potential VOC emissions are calculated to equal or exceed 6 TPY, the permittee must either maintain the uncontrolled actual VOC emissions at less than 4 TPY and maintain monthly emission calculations in accordance with 40 CFR 60.5395(d)(2); or install a control device, closed vent system, and covers designed and operated to reduce VOC emissions by 95.0%, and by 4/15/14 or 60 days after startup for Group 2 storage vessels or by 4/15/15 for Group 1 storage vessels.

[The permittee must] [c]onduct monthly inspections of collection and control equipment.

52. GP PTIO 12.1 and GP PTIO 12.2, at Condition C. 6. b) (2) e., state:

³ Some, but not all, of Pin Oak's permits at issue in this matter include Section C.7. See Appendix A.

⁴ GP PTIO 12.1 and GP PTIO 12.2 contain the asterisks but have no corresponding footnotes. However, Subpart OOOO, at 40 C.F.R. § 60.5430, defines a "Group 1 storage vessel" as a storage vessel for which construction, modification or reconstruction commenced after August 23, 2011, and on or before April 12, 2013. Subpart OOOO, at 40 C.F.R. § 60.5430, defines a "Group 2 storage vessel" as a storage vessel for which construction, modification or reconstruction commenced after April 12, 2013, and on or before September 18, 2015.

Unless meeting the requirements of 40 CFR 60.5395(d)(2), where the uncontrolled actual VOC emissions can be demonstrated to be less than 4 tons per year, or where it has been demonstrated that the potential VOC emissions are less than 6 TPY, the VOC emissions from each storage vessel affected facility shall be reduced by 95.0 percent by April 15, 2014, or within 60 days after startup, for Group 2 storage vessels; or by April 15, 2015 for Group 1 storage vessels.

[40 CFR 60.5395] and [40 CFR 60.5415(e)(3)]

53. GP PTIO 12.1 and GP PTIO 12.2, at Condition C. 6. c) (2), state:

Each storage vessel subject to the control requirements of Part 60 Subpart OOOO shall be equipped with a cover that meets the requirements of 40 CFR 60.5411(b); and the storage vessel shall be connected through a closed vent system designed and operated with no detectable emissions, as determined using olfactory, visual and auditory inspections, and in accordance with 40 CFR 60.5411(c) to either: 1. an enclosed combustion control device, designed and operated in accordance with 40 CFR 60.5412(d) or 40 CFR 60.5413(d); 2. an open flare meeting the requirements identified in this permit; or 3. to a process. The collection and control systems shall be operated at all times when gases, vapors, and fumes are vented from the subject storage vessels to a control device; and where routing emissions to a process it must be operational 95% or more of the year.

[40 CFR 60.5365(e)], [40 CFR 60.5395], [40 CFR 60.5410(h)], [40 CFR 60.5411(b) and (c)(1) and (2)], and [40 CFR 60.5412(d)] or [40 CFR 60.5413(d)], and [40 CFR 60.5415(e)(3)]

54. GP PTIO 12.1 and GP PTIO 12.2, at Condition C. 6. d) (3), state:

Where required, the permittee shall conduct monthly inspections for each closed vent system, each cover, and the combustion control device used to demonstrate compliance in accordance with 40 CFR 60.5416(c) and 40 CFR 60.5417(h); and shall maintain the records identified in 40 CFR 60.5420(c).

[40 CFR 60.5416(c)], [40 CFR 60.5417(h)], [40 CFR 60.5411(b) and (c)], [40 CFR 60.5415(e)(3)], and [40 CFR 60.5420(c)]

55. GP PTIO 12.1 and GP PTIO 12.2, at Condition C. 6. e) (2), state:

The permittee shall submit an initial annual report within 90 days after the end of the initial compliance period for each storage vessel determined to have potential VOC emissions equal or greater than 6 tons per year. Subsequent annual reports are due no later than the same date each year following the initial report. The reports shall include the information identified in 40 CFR 60.5420(b).

[40 CFR 60.5420(b)] and [40 CFR 60.5410(h) and (i)]

56. GP PTIO 12.1 and GP PTIO 12.2, at Condition C. 6. f) (1), state, in pertinent part:

Continuous compliance with the Part 60, Subpart OOOO standards for storage vessel affected facilities shall be demonstrated by complying with the applicable portions of 40 CFR 60.5415(e), 40 CFR 60.5416(c), and 40 CFR 60.5417(d) or (h).

Kamm Permit

57. On September 3, 2014, Ohio EPA issued PTIO P0115768 to an entity called EQT Production Co for the Kamm Well Pad (Kamm PTIO). The Kamm PTIO is effective until its expiration date of September 3, 2024.

58. Permit condition A. 1. of the Kamm PTIO states:

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).

59. Permit condition A. 13. of the Kamm PTIO states:

You can transfer this permit to a new owner or operator. . . . Any transferee of this permit must assume the responsibilities of the transferor permit holder.

60. Permit condition C. 1. a) (1) of the Kamm PTIO states that all of the provisions for equipment and pipeline leaks at Section C. 1. are federally enforceable for the purpose of a permit-to-install.

61. Permit Condition C. 1. c) (2) of the Kamm PTIO states, in pertinent part:

The permittee shall develop and implement a work practice plan designed to monitor and repair leaks from ancillary equipment covered by this permit, including each pump, compressor, pressure relief device, connector, valve, flange, vent, cover, any bypass in the closed vent system, and each storage vessel.

62. Permit Condition C. 1. c) (2) of the Kamm PTIO states:

Leaks shall be detected by the use of either a "Forward Looking Infra Red" (FLIR) camera or an analyzer meeting U.S. EPA Method 21 of 40 CFR Part 60, Appendix A. . . .

An initial monitoring shall be completed within 90 days of startup and quarterly thereafter for a period of four consecutive quarters (1 year). . . . If following the initial four consecutive quarters, less than or equal to 2.0% of the ancillary equipment are determined to be leaking during the most recent quarterly monitoring event, then the frequency of monitoring can be reduced to semiannual. . . . If following two consecutive semi-annual periods, less than 2.0% of the ancillary equipment are determined to be leaking during the most recent semi-annual monitoring event, then the frequency of the monitoring can be reduced to annual. . . . If more than or equal to 2.0% of the ancillary

equipment are determined to be leaking during any one of the semi-annual or annual monitoring events, then the frequency of monitoring shall be returned to quarterly.

63. Permit Condition C. 1. d) (1) of the Kamm PTIO states:

The permittee shall develop and implement a site-specific work practice plan designed to monitor and repair or eliminate equipment leaks. This work practice plan shall include, at a minimum, the leak detection and repair monitoring and recordkeeping requirements in d)(2) or d)(3) below.

64. Permit Condition C. 1. d) (2) of the Kamm PTIO states:

Ancillary Equipment Leak Detection and Repair Program Monitoring and Record Keeping for Programs Utilizing FLIR Cameras

- a. Leaks shall be determined by visually observing each ancillary component through the FLIR camera to determine if leaks are visible.*
- b. The following information shall be recorded during each leak inspection:*
 - i. the date the inspection was conducted;*
 - ii. the name of the employee conducting the leak check;*
 - iii. the identification of any component that was determined to be leaking;*
 - iv. the date the first attempt to repair the component was made;*
 - v. the reason the repair was delayed following the language found in 40 CFR 60.5416(c)(5);*
 - vi. the date the component was repaired and determined to no longer be leaking;*
 - vii. the total number of components that are leaking; and*
 - viii. the percentage of components leaking, determined as the sum of the number of components for which a leak was detected, divided by the total number of ancillary components capable of developing a leak, and multiplied by 100.*
- c. The permittee shall maintain records that demonstrate the FLIR camera is operated and maintained in accordance with the manufacturer's operation and maintenance instructions.*
- d. The records from each inspection and the dates each leak is detected and repaired shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.*

65. Permit Conditions C. 1. e) (1) and C. 3. e) (2) of the Kamm PTIO state, in pertinent part:

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...

66. Permit condition C. 3. a) (1) of the Kamm PTIO states that all of the provisions for flash vessels and storage vessels at Section C. 3. are federally enforceable for the purpose of a permit-to-install.

67. Permit Condition C. 3. f) (1) a. of the Kamm PTIO states:

Design Efficiency:

Install a flare and capture system with a design capture efficiency of 98.7% for vapor balancing of liquid loading and a design control efficiency of at least 95% for VOC emissions.

Applicable Compliance Method:

Compliance is demonstrated by the manufacturer's guaranteed specifications for the flare control efficiency of at least 93.8%.

Relevant Factual Background and Conclusions of Law

68. Pin Oak is a limited liability company incorporated in the State of Ohio.

69. Pin Oak is a "person" within the meaning of Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

70. Pin Oak owns and operates several oil and natural gas well pads in Columbiana, Guernsey, Mahoning, Trumbull, and Washington counties in Eastern Ohio. The well pads subject to this NOV/FOV are listed in Appendix A. Each well pad was issued a GP 12.1 or 12.2 PTIO under OEPA's General Permit program, with the exception of the Kamm well pad, which is subject to a facility-specific PTIO (Kamm PTIO).

71. Pin Oak acquired the Clark, Kamm, and Spencer well pads from EQT Production Co on January 1, 2017.

72. Pin Oak acquired the Avalon Farms, Davidson, Grenamyre, Kibler, and Zerovich well pads from Halcon on April 1, 2017.

73. Pin Oak acquired the Brugler and Buckeye well pads from Beland Energy, LLC on January 31, 2019.

74. Pin Oak acquired the Caywood well pad from Protégé Energy III, LLC on April 1, 2019.

75. Pin Oak acquired the East Clark South, Gooding, Kinsey, and Wagner well pads from Chevron Appalachia, LLC on January 31, 2020, and sold the same four well pads to EOG Resources, LLC on August 31, 2022.

76. As part of the acquisitions listed in paragraphs 71 through 75 above, the prior owners transferred their PTIOs to Pin Oak.

77. On August 30, 2022, EPA staff inspected the following well pads owned and operated by Pin Oak (August 2022 Inspections): Clark, East Clark South, Gooding, Kamm, Kinsey, Spencer, and Wagner.

78. On February 21, 2023, EPA issued to Pin Oak an information request under Section 114 of the CAA covering all well pads owned and operated by Pin Oak in Ohio at that time, as well as the well pads that were inspected on August 29, 2022 but subsequently sold (February 2023 Information Request).

79. On various dates between May 2023 and August 2023, Pin Oak responded to the February 2023 Information Request (Pin Oak's Response).

80. Each of Pin Oak's well pads listed in Appendix A has vessels that contain an accumulation of condensate and/or produced water and are constructed primarily of non-earthen materials. Therefore, each vessel is a "storage vessel" as that term is defined in Subpart OOOO, at 40 C.F.R. § 60.5430, and Subpart OOOOa, at 40 C.F.R. § 60.5430a.

81. Each of Pin Oak's well pads listed in Appendix A has one or more gas-driven pneumatic controllers. Therefore, each pneumatic controller is a "pneumatic controller affected facility" as that term is defined in Subpart OOOO, at 40 C.F.R. § 60.5430, and Subpart OOOOa, at 40 C.F.R. § 60.5430a.

82. In Pin Oak's Response, Pin Oak provided the potential for VOC emissions determinations for the storage vessels at all the well pads listed in Appendix A, as required under 40 C.F.R. § 60.5365(e) or 40 C.F.R. § 60.5365a(e), as applicable.

83. According to Pin Oak's Response, each of the storage vessels at each of the well pads listed in Appendix A had the potential for VOC emissions equal to or greater than six tons per year for a 30-day period of production prior to the emission determination deadline in Subparts OOOO and OOOOa, as applicable, and the PTIOs issued to the well pads do not include any legally or practicably enforceable limits to restrict the potential VOC emissions from each storage vessel to less than six tons per year. The storage vessels at Pin Oak's well pads listed in Appendix A are therefore all "storage vessel affected facilities" subject to either Subpart OOOO or OOOOa, depending on the storage vessel's date of construction, re-construction, or modification.⁵

84. In Pin Oak's Response, Pin Oak stated that for all of its well pads, control devices were either not present, not in use, or disconnected. Pin Oak did not provide any evidence of vapor or emissions being routed to a process at any well pads. The specific nature of the controls at each inspected well pad, at the time of the inspection, are provided in the table below:

Well Pad	Control Device Description
Clark	Combustion device not in use. Valve in place to prevent flow to combustion device.
East Clark South	Flare for overpressure protection.
Gooding	Flare for overpressure protection.

⁵ As discussed above in Paragraphs 6 and 19, storage vessels constructed, reconstructed, or modified between August 23, 2011 and September 18, 2015 are subject to NSPS Subpart OOOO, and storage vessels constructed, reconstructed, or modified after September 18, 2015 are subject to NSPS Subpart OOOOa.

Kamm	Flare for overpressure protection. Valve in place to prevent flow to combustion heater.
Kinsey	Two vapor recovery compressor that were not in use at the time of the inspection.
Spencer	Site uses a relief tank. Valve in place to prevent flow to the combustor.
Wagner	Vapor recovery unit decommissioned. Flare for overpressure protection.

85. In Pin Oak's Response, Pin Oak did not provide any information showing that the storage vessel affected facilities at any of its well pads had uncontrolled actual VOC emissions of less than four tons per year. Therefore, Pin Oak is required by Subpart OOOO, Subpart OOOOa, and the PTIOs to achieve 95.0 percent reduction of VOC emissions from each storage vessel affected facility.

86. Each of Pin Oak's well pads listed in Appendix A is a surface site constructed for oil and gas drilling that includes components that have the potential to emit fugitive emissions of VOC at a well site or compressor station. Therefore, at each well pad that commenced construction, reconstruction, or modification after September 18, 2015, Pin Oak owns and operates the "collection of fugitive emissions components" at a "well site" pursuant to Subpart OOOOa, making the well pad subject to the leak detection and repair provisions in its respective PTIO, as well as the applicable requirements for the collection of fugitive emissions components in Subpart OOOOa.

87. During the August 2022 Inspections, EPA inspectors detected emissions using an optical gas imaging (OGI) camera from thief hatches, pressure/vacuum relief devices, valves, and/or seals attached to storage vessels at the Clark, East Clark South, Gooding, Kamm, Kinsey, and Wagner well pads.

88. During the August 2022 Inspections, EPA inspectors noted odors near storage vessels at the Clark, Clark South, and Kamm well pads.

89. During the August 2022 Inspections, no activities were ongoing to add or remove material from the storage vessels, to inspect or sample the material in the storage vessels, to inspect, maintain, repair, or replace equipment in the storage vessels, or to vent material from the storage facilities through a closed-vent system.

90. In response to EPA's February 2023 Information Request, which requested records of all inspections, including LDAR inspections, OGI surveys, closed-vent system inspections, and cover inspections since February 2018, Pin Oak did not provide records demonstrating that it had conducted annual LDAR and OGI monitoring inspections, semiannual fugitive emissions monitoring surveys, and monthly audio, visual, olfactory (AVO) inspections for the well pads in the years shown in the table below.

Well Pad	2022	2021	2020	2019
Avalon Farms		No records of any monthly, semiannual,	No records of any monthly, semiannual, annual inspections	No records of any monthly or semiannual,

		or annual inspections		annual inspections
Brugler		No records of any semiannual or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections
Buckeye		No records of any semiannual or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections
Caywood		No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly inspections
Clark		No records of any semiannual or annual inspections	No records of any monthly inspections until November 2020	No records of any monthly inspections
Davidson		No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections
E Clark South	No records of any monthly inspections after July 2022; no records of any semiannual or annual inspections	No records of any semiannual or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly inspections
Gooding	No records of any monthly inspections after July 2022	No records of any semiannual or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly inspections
Grenamyer	No records of any annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections

Kamm	No records of monthly inspections after November 2022	No records of semiannual or annual inspections	No records of any monthly inspections until November 2020	No records of any monthly inspections
Kibler		No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections
Kinsey	No records of any monthly inspections until July 2022; no records of any semiannual or annual inspections	No records of any semiannual or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly inspections
Spencer		No records of any semiannual or annual inspections	No records of any monthly inspections until November 2020	No records of any monthly inspections
Wagner	No records of any monthly inspections until July 2022	No records of any semiannual or annual inspections	No records of any monthly inspections until November 2020; no records of any semiannual or annual inspections	No records of any monthly inspections
Zerovich		No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections	No records of any monthly, semiannual, or annual inspections

91. In response to EPA's February 2023 Information Request, which requested records of annual reports required by Subpart OOOO and OOOOa and Permit Evaluation Reports (PERs) required by the facilities' permits since February 2018, Pin Oak did not provide annual reports required by Subparts OOOO and OOOOa for any of its well pads. Pin Oak also did not provide a 2019-2020 PER for the Caywood well pad.

92. In response to EPA's February 2023 Information Request, which requested several specific pieces of information about each natural gas-driven pneumatic controller on site at each well pad since February 2018, Pin Oak did not provide any specific documentation about pneumatic controllers at any of its well pads.

93. In response to EPA's February 2023 Information Request, which requested all air permit applications submitted to OEPA, either by Pin Oak or any previous owner or operator, for each well

pad facility, Pin Oak did not provide permit applications for any of its well pads except for the Avalon Farms well pad.

94. Although Pin Oak's Response stated there were no control devices in use at the Avalon Farms well pad, Pin Oak's air permit application for Avalon Farms contained the following statement: *"Volatile Organic Compound (VOC) emissions from the storage vessels and tank truck loading operations are equipped with a vapor return line, which ultimately vents to flare. The flare is designed to achieve 98% control efficiency."*

Violations

95. Based on emissions observed by EPA inspectors using AVO and OGI at the Clark, East Clark South, Gooding, Kamm, Kinsey and Wagner well pads, Pin Oak failed to ensure that the covers and all openings of the storage vessels form a continuous impermeable barrier over the entire surface area of the liquid in the vessel, and that each cover opening is secured in a closed, sealed position except during the activities described in Paragraph 2 above, in violation of Subpart OOOO, at 40 C.F.R. § 60.5411(b), or Subpart OOOOa, at 40 C.F.R. § 60.5411a(b), as applicable; GP 12.1 and 12.2 Conditions C. 6. B) (1) c. and C. 6. C) (2), or C. 7. B) (1) c. and C. 7. C) (2), as applicable; and Kamm PTIO Condition C. 3. b) (1) b.

96. For each of its well pads, Pin Oak failed to connect the storage vessels and covers to a closed-vent system that routes emissions to a control device or process, violating Subpart OOOO, 40 C.F.R. § 60.5395(e)(1), or Subpart OOOOa, 40 C.F.R. § 60.5395a(e)(2), as applicable, and GP 12.1 and 12.2 Conditions C. 6. b) (1) c. and C. 6. c) (2), as applicable.

97. Pin Oak failed to conduct inspections of the storage vessel covers and fugitive emissions components and/or failed to maintain records documenting those inspections at each of its well pads, violating Subpart OOOO, at 40 C.F.R. §§ 60.5416(c), 60.5420(c)(6)-(7), or Subpart OOOOa, 40 C.F.R. §§ 60.5416a(c), 60.5420a(c)(6)-(7), and 60.5397a(a)(1), as applicable; GP 12.1 and 12.2 Condition C. 6. d) (3); and Kamm PTIO Condition C. 1. d) (2).

98. Pin Oak failed to conduct monitoring and/or failed to maintain records of monitoring inspections of each piece of ancillary equipment at the required frequencies at each of its well pads, violating GP 12.1 and 12.2 Conditions C. 5. c) (2) and C. 5. d) (2) (b), as applicable, and Kamm PTIO Conditions C. 1. d) (1) and C. 1. d) (2).

99. Pin Oak failed to submit and/or failed to maintain records of submitted OOOO, OOOOa, and PER annual reports required under Subparts OOOO and OOOOa, violating Subpart OOOO, at 40 C.F.R. § 60.5420(c), or Subpart OOOOa, at 40 C.F.R. § 60.5420a(c), as applicable; GP 12.1 and 12.2 Conditions C. 5. e) (1) and C. 6. e) (1); and Kamm PTIO Conditions C. 1. e) (1) and C. 3. e) (1).

100. Pin Oak failed to record pneumatic controller information and/or maintain records of this information at all well pads, violating Subpart OOOO, at 40 C.F.R. § 60.5420(c)(4), or Subpart OOOOa, at 40 C.F.R. § 60.5420a(c)(4), as applicable; GP 12.1 and 12.2 Condition C. 5. d) (1) b; and Kamm PTIO Condition C. 1. d) (4).

101. Pin Oak failed to demonstrate continuous compliance at the storage vessels at the well pads listed in Appendix A by failing to reduce VOC emissions at the storage vessels by 95.0 percent, or

alternatively, to maintain the uncontrolled actual VOC emissions from the storage vessels to less than four tons per year, violating Subpart OOOO, at 40 C.F.R. § 60.5415(e), or Subpart OOOOa, at 40 C.F.R. § 60.5415a(e), as applicable; GP 12.1 and 12.2 Conditions C. 6. f) (1), as applicable; and Kamm PTIO Condition C. 3. f) (1).

102. Because Pin Oak did not use control devices at any of its storage vessels, did not maintain uncontrolled emissions at the storage vessels to less than four tons per year or reduce VOC emissions at the storage vessels by 95.0 percent, and failed to conduct inspections at the required frequencies, Pin Oak failed to operate each of its well pads in a manner consistent with good air pollution control practice for minimizing emissions, violating Subpart OOOO, at 40 C.F.R. § 60.5370(b), or Subpart OOOOa, at 40 C.F.R. § 60.5370a(b), as applicable.

103. Because the storage vessels at Pin Oak's Avalon Farms well pad were not equipped with a vapor return line, Pin Oak failed to operate the storage vessels in accordance with the application(s) submitted and all the terms and conditions contained in the PTIO(s), violating GP 12.1 and 12.2 Condition A.1.

Environmental Impact of Violations

104. These violations have caused or can cause excess emissions of VOCs and methane.

105. VOC emissions can cause eye, nose, and throat irritation, headaches, loss of coordination, nausea, and damage to the liver, kidneys, and the central nervous system.

106. VOC emissions are a precursor to ground-level ozone. Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame lung tissue.

107. Methane is a potent greenhouse gas, and emissions of methane contribute to climate change.

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Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Appendix A.

Facility Name	Permit Type	Permit Issued	Facility Air Permit ID	Conduct LDAR Monitoring	Records of Pneumatic Controllers	Conduct and Record Inspections	Storage Vessel Requirements and Closed Vent System Design	Demonstrate Continuous Compliance	Submit Annual Reports	Tanks Subject to Subpart
Avalon Farms	12.1	11/14/13	P0115763	C. 5. d) (1)	-	C. 5. d) (1)	-	-	C. [5,7]. e)	OOOO
Brugler	12.1	08/15/23	P0134527	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 7. b) (1) c., C. 7. c) (2)	C. 7. f) (1)	C. [5,7]. e)	OOOO
Buckeye	12.1	08/18/23	P0134528	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 7. b) (1) c., C. 7. c) (2)	C. 7. f) (1)	C. [5,7]. e)	OOOO
Caywood	12.1	11/10/15	P0119817	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 6. b) (1) c., C. 6. c) (2)	C. 6. f) (1)	C. [5-6]. e)	OOOOa
Clark	12.2	03/08/16	P0120363	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 6. b) (1) c., C. 6. c) (2)	C. 6. f) (1)	C. [5-6]. e)	OOOO
Davidson	12.1	12/06/13	P0115922	C. 5. d) (1)	-	C. 5. d) (1)	-	-	C. [5,7]. e)	OOOO
E Clark South	12.1	03/12/15	P0118581	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 7. b) (1) c., C. 7. c) (2)	C. 7. f) (1)	C. [5,7]. e)	OOOO
Gooding	12.1	07/31/15	P0119201	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 7. b) (1) c., C. 7. c) (2)	C. 7. f) (1)	C. [5,7]. e)	OOOOa
Grenamyre	12.1	03/14/14	P0116458	C. 5. d) (1)	-	C. 5. d) (1)	-	-	C. [5,7]. e)	OOOO
Kamm	PTIO	09/03/14	P0115768	-	C. 1. d) (4)	C. 1. d) (2)	-	C. 3. f) (1)	C. [1,3]. e)	OOOO
Kibler	12.1	08/18/23	P0134530	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 7. b) (1) c., C. 7. c) (2)	C. 7. f) (1)	C. [5,7]. e)	OOOO
Kinsey	12.1	05/18/16	P0120657	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 7. b) (1) c., C. 7. c) (2)	C. 7. f) (1)	C. [5,7]. e)	OOOOa
Spencer	12.2	03/06/23	P0133528	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 6. b) (1) c., C. 6. c) (2)	C. 6. f) (1)	C. [5-6]. e)	OOOO
Wagner	12.1	05/20/15	P0118797	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 7. b) (1) c., C. 7. c) (2)	C. 7. f) (1)	C. [5,7]. e)	OOOOa
Zerovich	12.1	12/15/22	P0133366	C. 5. c) (2)	C. 5. d) (1) b.	C. 5. d) (2) b.	C. 7. b) (1) c., C. 7. c) (2)	C. 7. f) (1)	C. [5,7]. e)	OOOO