Attachment 1

April 27, 2020 Self-Disclosure Letter

April 27, 2020

Via Hand Delivery

DIRECTORS OFFICE

12 MAY 2020 AM10:22

RECEIVED

Laurie A. Stevenson
Director
Ohio EPA
Lazarus Government Center
50 W. Town St., Ste. 700
Columbus, Ohio 43215

Re: Utica Resource Operating LLC – Voluntary Self-Disclosure

Dear Ms. Stevenson:

Utica Resource Operating, LLC ("Utica") hereby submits the following information in connection with Utica's voluntary self-disclosure of its noncompliance with certain state air quality permitting requirements for certain Utica oil and gas facilities located in Ohio (the "Self-Disclosure"). This voluntary Self-Disclosure is submitted pursuant to the requirements and criteria under Ohio's Audit Privilege and Immunity Law, Ohio Rev. Code §§ 3745.70 – 3745.72 (the "Act"). Summarized herein is the relevant factual information that supports Utica's Self-Disclosure and request for immunity under the Act, as well as the information required by O.R.C. § 3745.72(C).

In January of 2020, Utica voluntarily initiated a comprehensive environmental audit of its Ohio oil and gas facilities to determine facility compliance with applicable Ohio air quality permitting requirements (the "Environmental Audit"). Utica retained an environmental consultant to assist in the Environmental Audit, which proceeded under the direction of legal counsel for Utica. The Environmental Audit included internal meetings and discussions among Utica's personnel and outside environmental consultants; a detailed collection and review of environmental records; site reconnaissance visits; and multiple communications with outside legal counsel. In early April 2020, the audit team determined that certain Utica facilities are in noncompliance with certain permit recordkeeping, reporting, monitoring, and other requirements for different durations over the last several years. The noncompliance issues are identified in more detail in the spreadsheet attached hereto as Attachment A. The information provided in Attachment A is part of an environmental audit report and is being disclosed under O.R.C. § 3745.72 in order to obtain the immunity provided in that section.

Questions or requests for additional information should be directed to Maureen Kertes, EHS Professional at 740-516-0452.

Sincerely,

Maureen Kertes

Maureen Kertes
Utica Resource Operating, LLC
2167C State Route 821
Marietta, Ohio 45750

Cole Pad

Permit Nos. P0118690, P0120400

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	J001/Truck Loading P001, P004/Flares T001/Storage Tanks P002/Dehy	P0120400 / C.1.(d)(2)&(8) C.2(d)(3)&(9) C.3(d)(2)&(9) P0118690/C.3(d)(3)	No documentation of the manufacturer's recommendations, instructions or operating manuals for the flare were available. No records were available documenting that the flare thermocouple was properly installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations.	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
4	J001/Truck Loading P001, P004/Flares T001/Storage Tanks P002/Dehy	P0120400 / C.1.(d)(3)-(6) C.2.(d)(4),(5)& (6) C.3(d)(3),(4)&(5) P0118690/C.3.(d)(4)-(6)	No records of periodic or annual flare inspections per manufacturer's recommendation were available	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
5	J001/Truck Loading	P0120400 / C.1.(d)(7)	No records were available documenting leaks from condensate transfer operations.	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
6	P001, P004/flares	P0120400 / C.2.(d)	No records of volume of gas going to the flare.	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
7	T001/Storage Tanks	P0120400 / C.3.(b)(2) C.1.(d)(1) C.3.(d)(1) 40 CFR Part 60 Subpart OOOO §60.5365(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 8 tanks while 16 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020
8	P002/Dehy	P0118690 / C.3.(d)(10) 40 CFR Part 63 Subpart HH §63.764(e)	No GlyCalc reports using a site-specific analysis were available to demonstrate that the annual benzene emissions were < 1 TPY (0.90 Mg/Yr).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020

Detweiler Pad

Permit Nos. P0112730 and P0119586

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	T001/Storage Tanks	P0119586 / C.6(b)(3)d. C.6.(d)(1)a.-d. & (6) 40 CFR Part 60 Subpart OOOO §60.5365(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020
4	F002/Unpaved Roadways and Parking Areas	P0112730 / C.6(d)(3)	No daily inspection records of roadways and parking areas were available for review.	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020

Dynamite Pad

Permit #P0117997 and #P0122240

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	J001/Truck Loading T001/12 Storage Tanks	P0122240 / C.1.(d)(1)&(2) C.2.(d)(1)&(2) C.3.(d)(9) C.4.(d)(2)	No rolling 12 emissions records for the VOC content for the condensate and water tanks and truck loading were available.	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
4	J001/Truck Loading T001/12 Storage Tanks	P0122240/C.1.(d)(1) C.2.(b)(2)c. & C.2.(d)(1)&(2) C.3.(d)(9) C.4.(b)(2) & C.4.(d)(1)&(2) 40 CFR Part 60 Subpart OOOOa §60.5365a(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 9 tanks while 16 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020
5	T001/12 Storage Tanks P004, P011, P012/flares	P0122240 / C.2.(e.)(1) C.3.(e)(1) C.4.(e)(1)	No records of quarterly deviation reports were available. If no deviations (excursions) occurred during a calendar quarter, the permittee is still required to submit a report that states that no deviations (excursions) occurred during that quarter.	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
6	T001/12 Storage Tanks P004, P011, P012/flares	P0122240/ C.1.(d)(2) C.2.(d)(3),(7)&(8) C.3(d)(2)&(6) C.4.(d)(3)	No documentation of the manufacturer's recommendations, instructions, or operating manuals for the VRU and flare were available for review. No records of the continuous temperature monitor and recorder on the flare stack was installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual.	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020

Dynamite Pad

Permit #P0117997 and #P0122240

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
7	J001/Truck Loading P004, P011, P012/flares	P0122240 / C.1.(d)(3)-(5) C.3.(d)(4),(5)&(7)	No records of periodic or annual flare inspections per manufacturer's recommendation were available	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
8	P002/Engines	P0117997 / C.2.(d)(1) 40 CFR Part 60 Subpart JJJJ §60.4243(a)	No JJJJ manufacturer certification documents were available for the backup NG VRC engine (Zenith, Manuf. date 12/2016), maintenance plan or maintenance records were available.	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020

Garvin Pad

Permits #P0115458 & #P0119583

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	T001/Storage Tanks	P0119583 / C.6.(b)(3)d. C.6.(d)(1)a.-d. & (6) 40 CFR Part 60 Subpart OOOO §60.5365(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 3 tanks while 6 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020

Mason Pad

Permit #P0119760

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	T001/Storage Tanks	C.6.(b)(2)d. C.6.(d)(1) & (6) 40 CFR Part 60 Subpart OOOOa §60.5365a(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 2 tanks while 8 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020

Miley Pad

Permit #P0120524

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	T001/Storage Tanks	C.6.(b)(2)d. C.6.(d)(1)a.-d. & (6) 40 CFR Part 60 Subpart OOOOa §60.5365a(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 2 tanks while 6 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020

Neff Pad

Permit #P0121731

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	P002/Engines	C.2.(d)(1) 40 CFR Part 60 Subpart JJJJ §60.4243(a)	No NSPS JJJJ manufacturer certification document, maintenance plan, or maintenance records were available for the unit found onsite (Zenith, Manuf. date 02/2014).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
4	T001/Storage Tanks	C.6.(b)(2) C.6.(d)(1) C.6.(d)(6) 40 CFR Part 60 Subpart OOOOa §60.5365a(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 2 tanks while 4 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020

Neill Pad

Permit #P0119582

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	T001/Storage Tanks	C.6.(b)(2) C.6.(d)(1) C.6.(d)(6) 40 CFR Part 60 Subpart OOOO §60.5365(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 1 tank while 4 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020

Palmer Pad

Permit #P0117465

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	T001/Storage Tanks	C.6.(b)(2) C.6.(d)(1) C.6.(d)(6) 40 CFR Part 60 Subpart OOOO §60.5365(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 4 tanks while 6 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020

Stiers Pad

Permit #P0119584

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	T001/Storage Tanks	C.6.(b)(2) C.6.(d)(1) C.6.(d)(6) 40 CFR Part 60 Subpart OOOO §60.5365(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 5 tanks while 10 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020

Onega Comissioners Pad

Permit #P0119585

Finding Number	Unit / Equipment	Permit Condition / Citation(s)	Finding Description	Finding Start Date	Finding End Date	Corrective Action Plan	Target Completion Date
1	F001/Equipment Leaks	C.5.(d)(2) C.5.(c)(2) C.5.(d)(2)(d) C.5.(d)(2)(c)	A site-specific fugitive ancillary equipment LDAR program was not available for review. A first attempt to repair found leaks were not conducted within five (5) days. Generally it appears the records show first attempt to repair the leak was within 30 days. Specific detailed reports for the Q2 2018 inspections were not available, however, site photos and videos for these inspections were provided. No records were available documenting the FLIR camera was operated and maintained according to the manufacturer's O&M instructions.	4/1/2018	Present	The required records will be generated and maintained. First attempt repairs are now being made on the date of disovery and will be documented.	6/1/2020
2	Pneumatic Controllers	C. 5.(d)(1)	No records for the natural gas pneumatic controllers were available to document the date of installation or reconstruction, location and/or equipment each controller is servicing and manufacturer's design specification (including bleed rate).	4/1/2018	Present	The required records will be generated and maintained.	6/1/2020
3	P002/Engines	C. 2. (d) - (g) 40 CFR Part 60 Subpart JJJJ §60.4243(a) 40 CFR Part 63 Subpart ZZZZ §63.6585	No testing, notifications, recordkeeping, and/or reporting were available to demonstrate compliance with Subpart JJJJ or MACT ZZZZ.	4/1/2018	Present	The required records will be generated and maintained. Any required testing will be conducted.	6/1/2020
4	T001/Storage Tanks	C.6.(b)(2) C.6.(d)(1) C.6.(d)(6) 40 CFR Part 60 Subpart OOOO §60.5365(e)	No records of determination of storage vessel emissions using the max average daily throughput for first 30 days after startup. No records of lab analysis, calculations, or process simulation models were available documenting the annual working, breathing and flash emissions. Records for content and annual throughput for each storage vessel were available but incomplete. Data only included 7 tanks while 8 tanks were observed onsite. No records were available for 4/1/18 to 12/31/18. No records documenting the maximum monthly potential VOC emissions were available.	4/1/2018	Present	The required records will be requested. The required records will be generated and maintained.	6/1/2020