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**DELIVERY VIA COURIER AND E-MAIL**

Michael E. Hopkins, P.E.  
Assistant Chief, Permitting  
Ohio EPA, Division of Air Pollution Control  
50 West Town Street, Suite 700  
Columbus, Ohio 43215  
Email: [Mike.Hopkins@epa.state.oh.us](mailto:Mike.Hopkins@epa.state.oh.us)

Re: *Supplemental Comments of the Ohio Oil and Gas Association –  
Draft Marcellus Shale Drilling Site Air Pollution General Permit*

Dear Mr. Hopkins:

The Ohio Oil and Gas Association (Association) respectfully submits these additional comments on the Ohio EPA's draft model general permit for natural gas production sites (Draft General Permit). These comments supplement those submitted to the Ohio EPA on July 8, 2011.

**I. Supplemental Comments**

**A. The Draft General Permit Needs To Accommodate Wet Gas Stream Production Associated With Condensate Production.**

It is the Association's understanding that the Draft General Permit is being developed to expeditiously permit the natural gas production facilities associated with the development of the Utica and Marcellus Shale in Ohio. The Draft General Permit will be developed to protect the environment and public health, but will give industry a permitting mechanism that does not hinder development timing. The Association is concerned that the Draft General Permit needs to be able to incorporate not only dry gas production that may be seen primarily in the Marcellus production but to be able to accommodate a wetter gas stream that is associated with condensate production that may be seen in the Utica.

Michael E. Hopkins, P.E.  
Assistant Chief, Permitting, DAPC  
July 15, 2011  
Page 2

**B. The Ohio EPA Needs To Clarify Emission Limits In The Qualifying Criteria Document.**

The summary table of “restricted” potential to emit for VOC and NO<sub>x</sub> differs from the Qualifying Criteria No. 4. The VOC in the restricted table is greater than the VOC threshold stated in Qualifying Criteria No. 4, and the NO<sub>x</sub> limit in the table is far more restrictive. The Ohio EPA needs to clarify the basis for the emission limits in the summary table and in the Qualifying Criteria No. 4.

**C. The Draft General Permit Provisions For a Loading Rack and Condensate Storage Tanks Need To Be Clarified.**

Most natural gas well site loading is from tank to truck transport and does not involve a “loading rack.” Consequently, loading rack limits would be more appropriately characterized as tank to truck limits. In addition, the vapor pressure associated with the condensate is too low to be representative of condensate associated with natural gas production.

**D. The Terms and Conditions for Spark Ignition (SI) Internal Combustion Engines (ICE) Need Revision.**

It is not clear whether the Ohio EPA expects the SI ICEs to be driving a compressor or a generator. Because most natural gas compressor engines are not certified (Caterpillar, Waukesha), a certification requirement will limit the availability of engines. This problem could be avoided by revising the terms and conditions associated with engines to include testing to assure compliance rather than mandating certification.

In addition, maintaining the manufacturer’s operating manual on site can be difficult in remote locations. Having a maintenance plan and proper recordkeeping is a more protective control than mandating a manual on site. Moreover, the manual and/or maintenance plan should be allowed to be kept at a central location.

**E. The Destruction Efficiency of the Combustion Device/Flare Should Be Revised.**

Only manufacturers of enclosed flares/combustors claim more than 99% destruction efficiency, and this claim at varying operating conditions and gas constituents may not be attainable. Neither 40 CFR Part 60.18 nor Part 63.11 requires destruction efficiency. If a destruction efficiency is necessary, it should be set so that it is an attainable measure and not based on vendor claims.

Michael E. Hopkins, P.E.  
Assistant Chief, Permitting, DAPC  
July 15, 2011  
Page 3

## II. Conclusion

The Association appreciates the opportunity to supplement the comments it initially filed on July 8, 2011, on the model general permit for air emissions from natural gas production sites drafted by Ohio EPA. If you have any questions regarding these or our earlier comments, you can reach me at the contact information above.

Respectfully submitted,



Gregory D. Russell  
On behalf of the Ohio Oil and Gas Association

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