

John R. Kasich, Governor Mary Taylor, Lt. Governor Craig W. Butler, Director

August 4, 2017

**CERTIFIED MAIL** 

Mike LeBlanc Senior Vice President-Operations EnLink Midstream Operating, LP 1722 Routh Street, Suite 1300 Dallas, Texas 75201-2535

Re:

Final Findings and Orders for air pollution

violations

Dear Mr. LeBlanc:

Transmitted herewith are the Final Findings and Orders ("Orders") of the Director of Ohio EPA concerning the above-referenced matter.

Please note that the effective date of the Orders is the date that the Orders were entered into the Ohio EPA Director's journal, which is the date that is stamped on the first page of the Orders.

Silocerely,

James Kavalec, Manager Compliance/Enforcement Section Division of Air Pollution Control

ec: James Lee, PIC
Kara Philibin, DAPC
Lee Tullis, DAPC
Steve Feldmann, Legal
John Paulian, DAPC
Jessica Kuenzli, SEDO-DAPC

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### BEFORE THE

# OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

EnLink Midstream Operating, LP 1722 Routh Street, Suite 1300 Dallas, Texas 75201-2535

E2 Ohio Compression LLC 1722 Routh Street, Suite 1300 Dallas, Texas 75201-2535

E2 Appalachian Compression LLC 1722 Routh Street, Suite 1300 Dallas, Texas 75201-2535 <u>Director's Final Findings</u> and Orders

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: Laura Grachige Poate: 8-4-17

### **PREAMBLE**

It is agreed by the parties hereto as follows:

### I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to EnLink Midstream Operating LP ("EnLink"), E2 Ohio Compression LLC ("E2 Ohio") and E2 Appalachian Compressions LLC ("E2 Appalachian") (collectively "Respondents") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 3704.03 and 3745.01.

# II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondents and successors in interest liable under Ohio law. No change in ownership of Respondent or of the facility (as hereinafter defined) shall in any way alter Respondents' obligations under these Orders.

# III. <u>DEFINITIONS</u>

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 3704 and the rules promulgated thereunder.

# IV. FINDINGS

The Director of Ohio EPA makes the following findings:

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1. EnLink is the parent corporation of E2 Ohio (majority shareholder) and E2 Appalachian (sole shareholder). EnLink is headquartered at 1722 Routh Street, Suite. 1300, Dallas, Texas. EnLink manages the operations of E2 Ohio and E2 Appalachian. E2 Ohio and E2 Appalachian own, operate and hold permits for the following oil and gas midstream facilities. All of these facilities are classified as non-Title V.

#	Facility (ID)	Address	County
1	Hayes Facility (0630005039)	E2 Ohio Compression LLC Hayes Compressor Station	Guernsey
	(000000000)	21260 Grape Hollow Road	1
		Salesville, Ohio 43778	
2	Crum Facility	E2 Ohio Compression LLC	Noble
	(0661005040)	Crum Compressor Station	110010
		52934 Town Highway 192	
		Seneca Township, Ohio 43780	
3	Mizer Facility	E2 Ohio Compression LLC	Harrison
	(0634005090)	Mizer Compressor Station	
		84500 Addy Road	
1	D. 4. E :::	Cadiz, Ohio 43907	
4	Borton Facility	E2 Ohio Compression LLC	Guernsey
	(0630005041)	Borton Compressor Station	
		65483 Lydick Road	
5	Miller Facility	Quaker City, Ohio 43773 E2 Ohio Compression LLC	
	(0656005028)	Miller Compressor Station	Monroe
	(0000000000000)	51103 Township Road 847	
		Seneca Township, Ohio 43788	
6	Batesville Facility	E2 Appalachian Compression LLC	Noble
	(0661005027)	Batesville Compressor Station	Nobie
		58380 St John Road	
		Quaker City, Ohio 43773	
7	Reusser Facility	E2 Appalachian Compression LLC	Monroe
	(0656105005)	Reusser Compressor Station	
		Township Highway 68 &Township Highway 66	
		Woodsfield, Ohio 43793	
8	Upper Hill Facility	E2 Appalachian Compression LLC	Noble
	(0661005010)	Upper Hill Compressor Station	
		Opossum Run Road and Township Highway	
		120 Sarahsville, Ohio 43779	

2. ORC  $\S$  3704.05(C) prohibits any person who is a holder of a permit issued by the Director of Ohio EPA pursuant to ORC  $\S$  3704.03 from violating any of its terms and conditions.

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- 3. ORC § 3704.05(G) prohibits a person from violating any order, rule, or determination of the Director that was issued, adopted, or made under ORC Chapter 3704.
- 4. The Standard of Performance for New Stationary Spark Ignition Internal Combustion Engines (40 CFR Part 60, Subpart JJJJ) requires, in part, the owner or operator of a stationary spark ignition internal combustion engine to meet certain requirements and emissions limits based on the engine rating and manufacture date.
- 5. The requirements of 40 CFR Part 60, Subpart JJJJ are incorporated in Respondent's permit-to-install and operate ("PTIO") issued for the above facilities.

# Hayes Facility (Facility ID # 0630005039)

6. The following emissions units at the Hayes facility are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Description	Date Installed
F001	Fugitive equipment leak	11/18/14
F002	Unpaved roadways and parking areas	11/18/14
P004	Enclosed or open flare/ combustion device	11/18/14
P009	1680 hp natural gas Waukesha compressor engine	11/10/15
P010	1680 hp natural gas Waukesha compressor engine	11/10/15
P011	1680 hp natural gas Waukesha compressor engine	11/10/15
P012	1680 hp natural gas Waukesha compressor engine	11/10/15
P017	Equipment maintenance blowdown emissions	11/04/15
P021	Dehydration system	11/18/14
P032	690 hp natural gas engine	11/18/14
P033	Emergency electrical generator	08/20/15
T002	Load-out station controlled by a flare	11/18/14
T020	Gathering station controlled by two flares	11/18/14

- 7. PTIO P0117957 required E2 Ohio to conduct an initial performance test for EUs P009 to P012 and P032 no later than 180 days after the initial startup of the emissions unit. E2 Ohio conducted the performance tests for EUs P009 to P012 later than the May 9, 2016 deadline and for EU P032 later than the February 16, 2016 deadline, in violation of the terms and conditions of PTIO P0117957 and ORC § 3704.05(C). E2 Ohio conducted the initial stack tests on May 31, 2016 for EU P009, June 1, 2016 for P010, June 2, 2016 for P011, June 3, 2016 for EU P012, and August 31, 2016 for EU P032. SEDO sent a NOV letter to E2 Ohio for these violations on August 5, 2016.
- 8. PTIO P0117391 that was issued on September 23, 2014, required E2 Ohio to develop and implement a site-specific work practice plan ("WPP") designed to minimize or eliminate fugitive dust from EU F002 and submit the plan to Ohio EPA within 30 days of the issuance of the permit. In violation of the terms and conditions of PTIO P0117391

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and ORC § 3704.05(C), E2 Ohio failed to submit the WPP by the October 23, 2014 deadline. The WPP was received on June 1, 2016. SEDO sent a NOV letter to E2 Ohio for this violation on August 5, 2016.

- 9. PTIO P0117391 requires E2 Ohio to maintain records of all the inspections of EU F001 components for leaks using the Forward Looking Infra-Red ("FLIR") camera. In violation of the terms and conditions of PTIO P0118910 and ORC § 3704.05(C), E2 Ohio failed to maintain the required records.
- 10. PTIO P0117391 requires E2 Ohio to maintain records of all the inspections and treatments of EU F002. In violation of the terms and conditions of PTIO P0117391 and ORC § 3704.05(C), E2 Ohio failed to maintain the required records.
- 11. PTIO P0117391 requires E2 Ohio to maintain records of all the inspections and maintenance of the vapor recovery unit and low pressure flare controlling emissions from EU T020. E2 Ohio reports that, in violation of the terms and conditions of PTIO P0117391 and ORC § 3704.05(C), it failed to maintain the required records.
- 12. PTIO P0117391 requires E2 Ohio to maintain records of all the inspections and maintenance of the low-pressure flare controlling emissions from EU T002. In violation of the terms and conditions of PTIO P0117391 and ORC § 3704.05(C), E2 Ohio failed to maintain the required records.
- 13. In violation of the terms and conditions of PTIO P0117957 and ORC § 3704.05(C), E2 Ohio failed to maintain the required records for the following:
  - inspection and maintenance events for EU P014;
  - maintenance blowdown events of EU P017;
  - temperature readings at the outlet of EU P021 condenser;
  - calculations of the actual annual benzene emissions of EU P021;
  - annual throughput for EU P021;
  - the amount of propane used by EU P032;
  - inspection and maintenance events of EU P032;
  - hours of operation and type of fuel used by EU P033;
  - inspections and maintenance events of EU T002; and
  - inspection and maintenance events of EU T020.
- 14. During the June 1, 2016 inspection of the Hayes facility, by SEDO, no records were available for EUs F001, F002, P009-P012, P017, P021, P032, P033, T002, and T020. E2 Ohio started keeping records for these EUs in August 2016. SEDO sent a NOV letter to E2 Ohio for the recordkeeping violations on August 5, 2016. By letter dated September 1, 2016, E2 Ohio and Enlink submitted a response to the August 5, 2016 NOV. By letter dated December 14, 2016, Ohio EPA issued a partial Resolution of Violation ("PROV") to E2 Ohio. E2 Ohio and Enlink submitted a response to the PROV on January 11, 2017.

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15. As of the date of these Orders, all violations referenced above for the Hayes facility have been abated or, with respect to Finding No. 11, E2 Ohio reports it has been abated.

# Crum Facility (Facility ID # 0661005040)

16. The following emissions units at the Crum facility are the subject of these

Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Company Description	Date Installed
F001	Unpaved roadways and parking areas	01/06/15
J001	Condensate truck loading	01/06/15
P001	1680 hp natural gas Waukesha compressor engine	01/06/15
P002	1680 hp natural gas Waukesha compressor engine	01/06/15
P003	1680 hp natural gas Waukesha compressor engine	01/06/15
P004	1680 hp natural gas Waukesha compressor engine	01/06/15
P005	1680 hp natural gas Waukesha compressor engine	01/06/15
P006	1680 hp natural gas Waukesha compressor engine 01/06/15	
P007	1680 hp natural gas Waukesha compressor engine	01/06/15
P008	1680 hp natural gas Waukesha compressor engine	01/06/15
P009	1680 hp natural gas Waukesha compressor engine	01/06/15
P017	High pressure and low pressure flare 01/06/15	
T001	Storage tanks 01/06/15	

- 17. PTIO P0117011 required E2 Ohio to conduct an initial performance test for EUs P001 to P009 no later than 180 days after the initial startup of the emissions unit. E2 Ohio conducted the performance tests for EUs P001 to P009 later than the July 5, 2015 deadline, in violation of the terms and conditions of PTIO P0117011 and ORC § 3704.05(C). E2 Ohio conducted the initial stack test on August 12, 2015 for EUs P001 and P002, August 13, 2015 for EUs P003 and P004, August 5, 2015 for EU P005, August 6, 2015 for EUs P006 and P007, August 7, 2015 for EU P008, and August 11, 2015 for EU P009. SEDO sent a NOV letter to E2 Ohio for these violations on July 12, 2016.
- 18. PTIO P0117011 required E2 Ohio to operate EU P017 at a 100% capture and 98% control efficiency for VOCs emitted from several EUs at the facility. Moreover, PTIO P0117011 required E2 Ohio to control the VOC emissions from EUs J001 and T001 by installing a vapor recovery unit ("VRU") with 100% capture and 100% control efficiency. In violation of PTIO P0117011 and ORC § 3704.05(C), SEDO observed visible emissions of black particulate (smoke) being emitted from EU P017 on May 18, 2016 and May 27, 2016 while inspecting the facility. In violation of PTIO P0117011 and ORC § 3704.05(C), the VRU was not operating on May 18, 2016. E2 Ohio's representative confirmed that the VRU had not been working since April 1, 2016. Although the VRU had not been operating from April 1, 2016 to May 19, 2016, the VOC emissions were being routed to EU P017. SEDO sent a NOV letter to E2 Ohio for these violations on July 12, 2016 and requested a compliance plan.

- 19. PTIO P0117011 that was issued on January 6, 2015 required E2 Ohio to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F001 and submit the plan to Ohio EPA within 30 days of the issuance of the permit. In violation of the terms and conditions of PTIO P0117011 and ORC § 3704.05(C), E2 Ohio failed to submit the WPP by the February 6, 2016 deadline. SEDO sent a NOV letter to E2 Ohio for this violation on July 12, 2016. The WPP was received on August 11, 2016.
- 20. PTIO P0117011 requires E2 Ohio to maintain records of the number of hours per year the emissions from EU J002 are sent to the low pressure flare (EU P017). In violation of the terms and conditions of PTIO P0117011 and ORC § 3704.05(C), E2 Ohio failed to maintain the required records.
- 21. PTIO P0117011 requires E2 Ohio to maintain records of all of the inspections and treatments of EU F001.In violation of the terms and conditions of PTIO P0117011 and ORC § 3704.05(C), E2 Ohio reports that it failed to maintain the required records.
- 22. PTIO P0117011 requires E2 Ohio to maintain records of all the inspections and maintenance of the VRU and low pressure flare controlling the emissions from EUs J002 and T001. In violation of the terms and conditions of PTIO P0117011 and ORC § 3704.05(C), E2 Ohio failed to maintain the required records.
- 23. During the May 18, 2016 inspection of the Crum facility, by SEDO, no records were available for EUs J002 and T001. E2 Ohio started keeping records for these EUs in July 2016. SEDO sent a NOV letter to E2 Ohio for the recordkeeping violations on July 12, 2016.
- 24. As of the date of these Orders, all violations referenced above for the Crum facility have been abated or, with respect to Finding No. 21, E2 Ohio reports it has been abated.

# Mizer Facility (Facility ID # 0634005090)

25. The following emissions units at the Mizer facility are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Company Description	Date Installed
F001	Equipment fugitive emissions leaks	08/21/14
F002	Unpaved roadways and parking areas	08/21/14
P009	1680 hp natural gas Waukesha compressor engine	06/19/15
P010	1680 hp natural gas Waukesha compressor engine	06/19/15
P011	1680 hp natural gas Waukesha compressor engine	06/19/15
T001	Load-out station controlled by flare	06/17/15
T020	Gathering station controlled by flare	08/21/14

- 26. PTIO P0118098 required E2 Ohio to conduct an initial performance test for EUs P009 to P011 no later than 180 days after the initial startup of the emissions unit. E2 Ohio conducted the performance tests for EUs P009 to P011 later than the December 19, 2015 deadline, in violation of the terms and conditions of PTIO P0118098 and ORC § 3704.05(C). E2 Ohio conducted the initial stack test on February 24, 2016 for EU P009, February 25, 2016 for EU P010, and February 26, 2016 for EU P011. SEDO sent a NOV letter to E2 Ohio for these violations on September 19, 2016.
- 27. PTIO P0118098 that was issued on May 21, 2014 required E2 Ohio to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F001 and submit the plan to Ohio EPA within 30 days of the issuance of the permit. In violation of the terms and conditions of PTIO P0116819 and ORC § 3704.05(C), E2 Ohio failed to submit the WPP by the June 21, 2014 deadline. SEDO sent a NOV letter to E2 Ohio for this violation on September 19, 2016. The WPP was received on October 17, 2016.
- 28. PTIO P0118098 requires E2 Ohio to maintain records of all inspections of the EU F001 components for leaks. E2 Ohio reports that, in violation of the terms and conditions of PTIO P0118098 and ORC § 3704.05(C), it failed to maintain the required records.
- 29. PTIO P0118098 requires E2 Ohio to maintain records of all the inspections and maintenance of the VRU and low pressure flare from EU T002 and T020. E2 Ohio reports that, in violation of the terms and conditions of PTIO P0118098 and ORC § 3704.05(C), it failed to maintain the required records.
- 30. As part of a compliance review of the Mizer facility, SEDO discovered that E2 Ohio had failed to submit supplements to the PERs for EUs P001, P021, P002, F001, P004, and T001. Ohio EPA notified E2 Ohio of these violations on February 13, 2017. E2 Ohio responded to the February 13, 2017 NOV on March 15, 2017.
- 31. As of the date of these Orders, all violations referenced above for the Mizer facility have been abated or, with respect to Finding Nos. 28 and 29, E2 Ohio reports they have been abated.

# Borton Facility (Facility ID # 0630005041)

32. The following emissions units at the Borton facility are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Company Description	Date Installed
F001	Unpaved roadways and parking areas	03/16/15
P002	1680 hp natural gas Waukesha compressor engine	03/16/15
P003	1680 hp natural gas Waukesha compressor engine	03/16/15
P004	1680 hp natural gas Waukesha compressor engine	03/16/15

P012	High pressure flare	03/16/15
P013	Low pressure flare	03/16/15
P801	Equipment fugitive leaks	03/16/15
T001	Stabilized condensate/ produced water storage tanks	03/16/15

- 33. PTIO P0117475 requires the emissions from EUs P002 and P004 not to exceed 0.28 g/hp-hr for NOx, 0.174 g/hp-hr for CO and 0.03 g/hp-hr for VOC.
- 34. On October 15, 2015, E2 Ohio conducted an emission test for EU P002 and the emissions rates were 0.1818 g/hp-hr for CO and 0.0470 g/hp-hr for VOC, both rates were in violation of the terms and conditions of PTIO P0117475 and ORC § 3704.05(C). E2 Ohio conducted a re-test on March 2, 2016 and EU P002 passed for both CO and VOC.
- 35. On October 14, 2015, E2 Ohio conducted an emission test for EU P004 and the emissions rates were 0.37 g/hp-hr for NOx, 0.19 g/hp-hr for CO and 0.05 g/hp-hr for VOC, all rates were in violation of the terms and conditions of PTIO P0117475 and ORC  $\S$  3704.05(C). E2 Ohio conducted a re-test on May 12, 2016 and EU P004 and passed for NOx, CO and VOC.
- 36. On December 28, 2015 and January 8, 2016, SEDO sent NOV letters to E2 Ohio for the violations referenced in Finding Nos. 34 and 35 of these Orders.
- 37. PTIO P0117475 required E2 Ohio to conduct an initial performance test for EUs P002 to P004 no later than 180 days after the initial startup of the emissions unit. E2 Ohio conducted the performance tests for EUs P002, P003 and P004 later than the September 14, 2015 deadline, in violation of the terms and conditions of PTIO P0117475 and ORC § 3704.05(C). E2 Ohio conducted the initial stack test on October 15, 2015 for EU P002 and EU P003, October 14, 2015 for EU P004. SEDO sent a NOV letter to E2 Ohio for these violations on June 17, 2016.
- 38. PTIO P0117475 required E2 Ohio to operate EUs P012 and P013 at a 100% capture and 98% control efficiency of VOCs emitted from several of the EUs at the facility. Moreover, PTIO P0117475 required E2 Ohio to control the VOC emissions from EU T001 by installing a VRU with 100% capture and 100% control efficiency. In violation of PTIO P0117475 and ORC § 3704.05(C), SEDO observed visible emissions of black particulate (smoke) being emitted from EUs P012 and P013 on May 19, 2016 and May 27, 2016 while inspecting the facility. In violation of PTIO P0117475 and ORC § 3704.05(C), SEDO detected VOC emissions using the FLIR camera on May 19, 2016, indicating that the VRU was not achieving the required 100% capture and 100% control efficiency. SEDO sent a NOV letter to E2 Ohio for these violations on July 17, 2016 and requested a compliance plan.
- 39. PTIO P0117475 requires E2 Ohio to maintain records of all the daily inspections of EU P801. In violation of the terms and conditions of PTIO P0117475 and

ORC § 3704.05(C), E2 Ohio failed to maintain the required records.

- 40. PTIO P0117475 requires E2 Ohio to maintain records of the numbers of hours per year the emissions from EU T001 are sent to the low pressure flare (EU P013) in addition to the records of the periodic inspection and maintenance of the VRU controlling the emissions from EU T001. In violation of the terms and conditions of PTIO P0117475 and ORC § 3704.05(C), E2 Ohio failed to maintain the required records.
- 41. PTIO P0117475 requires E2 Ohio to maintain records of the periodic inspection and maintenance of EU P013 in addition to the records of the temperature recorded at EU P013 stack at any time this EU is in use. In violation of the terms and conditions of PTIO P0117475 and ORC § 3704.05(C), E2 Ohio failed to maintain the required records.
- 42. During the May 18, 2016 inspection of the Borton facility, by SEDO, no records were available for EUs P013, P801 and T001. E2 Ohio started keeping records for these EUs in July 2016. SEDO sent a NOV letter to E2 Ohio for the recordkeeping violations on July 12, 2016.
- 43. PTIO P0117475 requires E2 Ohio to maintain records of all the inspections and treatments of F001. E2 Ohio reports that, in violation of the terms and conditions of PTIO P0117475 and ORC § 3704.05(C), it failed to maintain the required records.
- 44. As of the date of these Orders, all violations referenced above for the Borton facility have been abated or, with respect to Finding No. 43, E2 Ohio's reports it has been abated.

# Miller Facility (Facility ID # 0656005028)

45. The following emissions units at the Miller facility are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Company Description	Date Installed
P001	1680 hp natural gas Waukesha compressor engine	08/31/15
P002	1680 hp natural gas Waukesha compressor engine	08/31/15
P003	1680 hp natural gas Waukesha compressor engine	08/31/15
P004	1680 hp natural gas Waukesha compressor engine	08/31/15
P005	1680 hp natural gas Waukesha compressor engine	08/31/15
P006	1680 hp natural gas Waukesha compressor engine	08/31/15
P007	1680 hp natural gas Waukesha compressor engine	08/31/15
P008	1680 hp natural gas Waukesha compressor engine	08/31/15
P009	1680 hp natural gas Waukesha compressor engine	08/31/15
P801	Equipment fugitive emissions leaks	08/31/15
T001	Condensate and produced water storage tanks	
F001	Unpaved Roadway and Parking Areas	08/31/15 08/31/15

P013	Low Pressure Flare	08/31/15
P014	High Pressure Flare	08/31/15

- 46. PTIO P0118418 requires the emissions from EUs P005, P006, P008 and P009 not to exceed 0.25 g/hp-hr for NOx, 0.50 g/hp-hr for CO and 0.16 g/hp-hr for VOC.
- 47. On February 5, 2016, E2 Ohio conducted an emission test for EU P005 and the emissions rate was 2.40 g/hp-hr for NOx, in excess of the PTIO limits. E2 Ohio conducted a re-test on March 2, 2016 and EU P005 passed for NOx.
- 48. On January 29, 2016, E2 Ohio conducted an emission test for EU P006 and the emissions rate was 1.15 g/hp-hr for NOx, in excess of the PTIO limits. E2 Ohio conducted a re-test on June 21, 2016 and EU P006 passed for NOx.
- 49 On January 21, 2016, E2 Ohio conducted an emission test for EU P008 and the emissions rates were 0.42 g/hp-hr for NOx and 4.3 g/hp-hr for CO, in excess of the PTIO limits. E2 Ohio conducted a re-test on June 21, 2016 and EU P008 passed for NOx and CO.
- 50. On January 22, 2016, E2 Ohio conducted an emission test for EU P009 and the emissions rates were 0.8 g/hp-hr for NOx and 4.43 g/hp-hr for CO, in excess of the PTIO limits. E2 Ohio conducted a re-test on June 22, 2016 and EU P009 passed for NOx and CO.
- 51. The excess emissions are violations of the terms and conditions of PTIO P0118418 and ORC  $\S$  3704.05(C). SEDO sent a NOV letter to E2 Ohio for these violations on May 18, 2016.
- 52. PTIO P0118418 required E2 Ohio to conduct an initial performance test for EUs P001 to P004 no later than 180 days after the initial startup of the emissions unit. E2 Ohio conducted the performance tests for EUs P001 to P004 later than the February 27, 2016 deadline, in violation of the terms and conditions of PTIO P0118418 and ORC § 3704.05(C). E2 Ohio conducted the initial stack tests for P001-P004 on June 20-22, 2016. SEDO sent a NOV letter to E2 Ohio for these violations on September 23, 2016.
- 53. PTIO P0118418 required E2 Ohio to submit a comprehensive written report of the results of the emission test(s) to Ohio EPA within 30 days following completion of the test(s). E2 Ohio submitted the reports late, in violation of the terms and conditions of PTIO P0118418 and ORC § 3704.05(C) for the following EUs:

EU	Date of Compliance Test	Date Stack Test Results Received	Days Late
P001	06/20/16	08/09/16	20
P002	06/20/16	08/09/16	20
P003	06/20/16	08/09/16	20

D004	Taavaavva		
P004	06/20/16	08/09/16	20
P005	02/05/16	04/25/16	50
P005	06/21/16	08/09/16	19
P006	01/29/16	04/25/16	57
P006	06/21/16	08/09/16	19
P007	01/27/16	04/25/16	59
P007	06/21/16	08/09/16	19
P008	01/21/16	04/25/16	65
P008	06/21/16	08/09/16	19
P009	01/22/16	04/25/16	64
P009	06/22/16	08/09/16	19

- 54. PTIO P0118418 required E2 Ohio to submit a supplement to the annual permit evaluation report ("PER") that includes information about all the inspections that occurred during the year for EU P801. In violation of the terms and conditions of PTIO P0118418 and ORC § 3704.05(C), E2 Ohio failed to submit the required report by the July 31, 2016 deadline.
- 55. PTIO P0118418 and 40 CFR Part 60, Subpart OOOO required E2 Ohio to submit annual reports within 90 days after the end of the initial compliance period that identifies the location of vessels, VOC emission rates and deviations of EU T001. In violations of the terms and conditions of PTIO P0118418 and ORC § 3704.05(C), E2 Ohio failed to submit the required reports by the deadline.
- 56. SEDO sent a NOV letter to E2 Ohio for EU P801 and T001 reporting violations on September 23, 2016 and requested E2 Ohio to submit the reports.
- 57. PTIO P0118418 requires E2 Ohio to maintain records of all inspections of EU P801 components for leaks. E2 Ohio reports that, in violation of the terms and conditions of PTIO P0118418 and ORC § 3704.05(C), it failed to maintain the required records.
- 58. PTIO P0118418 requires E2 Ohio to maintain records of all the inspections and maintenance of the VRU and the low pressure flare controlling emissions from EU T001. E2 Ohio reports that, in violation of the terms and conditions of PTIO P0118418 and ORC § 3704.05(C), it failed to maintain the required records.
- 59. PTIO P0118418 requires E2 Ohio to maintain records of all the inspections and treatments of EU F001. E2 Ohio reports that, in violation of PTIO P0118418 and ORC § 3704.05(C), it failed to maintain the required records.
- 60. As of the date of these Orders, all violations referenced above for the Miller facility have been abated or, with respect to Finding Nos. 57, 58 and 59, E2 Ohio reports they have been abated.

# Batesville Facility (Facility ID # 0661005027)

61. The following emissions units at the Batesville facility are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Company Description	Date Installed
F001	Unpaved roadways and parking areas	06/12/14
P001	1680 hp natural gas Waukesha compressor engine	06/20/14
P002	1680 hp natural gas Waukesha compressor engine	06/20/14
P003	1680 hp natural gas Waukesha compressor engine	06/20/14
P004	1680 hp natural gas Waukesha compressor engine	06/20/14
P005	1680 hp natural gas Waukesha compressor engine	06/20/14
P006	1680 hp natural gas Waukesha compressor engine	06/20/14
P007	1680 hp natural gas Waukesha compressor engine	06/20/14
P008	1680 hp natural gas Waukesha compressor engine	06/20/14
P015	215 hp natural gas Caterpillar compressor engine	06/21/14
P802	Equipment fugitive emissions leaks	06/20/14
T011	Condensate and produced water tanks	06/27/14
P018	Low Pressure Flare	06/17/14
P017	High Pressure Flare	06/17/14
P019	Thermal Oxidizer	06/17/14

- 62. PTIO P0115935 requires the emissions from EUs P005 and P006 not to exceed 0.254 g/hp-hr for NOx, 0.254 g/bhp-hr for CO and 0.06 g/bhp-hr for VOC.
- 63. On February 27, 2015, E2 Appalachian conducted an emission test for EU P005 and the emissions rate was 0.30 g/bhp-hr for CO, in excess of the PTIO limits. E2 Appalachian conducted a re-test on March 31, 2016 and EU P005 passed for CO. The excess emissions were a violation of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C).
- 64. On April 1, 2016, E2 Appalachian conducted an emission test for EU P006 and the emissions rates were 0.3119 g/bhp-hr for NOx, 0.2585 g/bhp-hr for CO, in excess of the PTIO limits. E2 Appalachian conducted a re-test on July 12, 2016 and EU P006 passed for NOx and CO. The excess emissions were violations of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C). SEDO sent a NOV letter to E2 Appalachian for these violations on August 3, 2016.
- 65. PTIO P0115935 required E2 Appalachian to conduct an initial performance test for EU P015 no later than 180 days after the initial startup (June 21, 2014) of the emissions unit. E2 Appalachian failed to conduct the performance test for EU P015 by December 14, 2014, in violation of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C). SEDO sent a NOV letter to E2 Appalachian for this violation on September 9, 2016. An initial performance test for EU P015 was completed on December 14, 2016, with passing results.

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- 66. PTIO P0115935 required E2 Appalachian to conduct an initial performance test for EUs P001 to P008 no later than 180 days after the initial startup of the emissions unit. E2 Appalachian conducted the performance tests for EUs P001 to P008 later than the December 17, 2014 deadline, in violation of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C). E2 Appalachian conducted the initial stack test on January 26, 2015 for EUs P001 and P002, January 27, 2015 for EU P003, February 19 for EU P007, February 20, 2015 for EU P004, February 27, 2015 for EU P005, February 27, 2015 for EU P008 and April 1, 2016 for EU P006. SEDO sent a NOV letter to E2 Appalachian for these violations on September 19, 2016.
- 67. PTIO P0115935 required E2 Appalachian to submit a comprehensive written report of the results of the emission test(s) to Ohio EPA within 30 days following completion of the test(s). E2 Appalachian submitted the reports late, in violation of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C) for the following EUs:

EU	Date of Compliance Test	Date Stack Test Results Received	Days Late
P001	01/26/15	03/09/15	12
P002	01/26/15	03/09/15	12
P003	01/27/15	03/09/15	13
P004	02/20/15	04/27/15	36
P005	02/27/15	04/27/15	29
P006	04/01/16	05/13/16	12
P007	02/19/15	04/27/15	37
P008	02/27/15	04/27/15	29

- 68. PTIO P0115935 that was issued on June 12, 2014 required E2 Appalachian to develop and implement a site-specific WPP designed to minimize or eliminate fugitive dust from EU F001 and submit the plan to Ohio EPA within 30 days of the issuance of the permit. In violation of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C), E2 Appalachian failed to submit the WPP by the July 12, 2014 deadline. The WPP was received on October 10, 2016 and revised on October 31, 2016. SEDO sent a NOV letter to E2 Appalachian for this violation on September 19, 2016.
- 69. PTIO P0115935 requires E2 Appalachian to maintain records of all of the inspections and maintenance of the VRU and low pressure flare controlling emissions from EU J001 and de minimis tanks. E2 Appalachian reports that, in violation of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C), it failed to maintain the required records.
- 70. PTIO P0115935 requires E2 Appalachian to maintain records of all of the inspections and maintenance of the thermal oxidizer controlling emissions from EU P010. E2 Appalachian reports that, in violation of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C), E2 Appalachian failed to maintain the required records.

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- 71. PTIO P0115935 requires E2 Appalachian to maintain records of all of the inspections and maintenance of the high pressure flare (P017) controlling emissions from EU P021. E2 Appalachian reports that, in violation of the terms and conditions of PTIO P0115935 and ORC § 3704.05(C), it failed to maintain the required records.
- 72. As of the date of these Orders, all violations referenced above for the Batesville facility have been abated or, with respect to Finding Nos. 69, 70 and 71, E2 Appalachian reports they have been abated.

# Reusser Facility (Facility ID # 0656105005)

73. The following emissions units at the Reusser facility are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Company Description	Date Installed
F001	Unpaved roadways and parking areas	03/28/14
P001	1680 hp natural gas Waukesha compressor engine	04/04/14
P002	1680 hp natural gas Waukesha compressor engine	04/04/14
P003	1680 hp natural gas Waukesha compressor engine	04/04/14
P004	1680 hp natural gas Waukesha compressor engine	04/04/14
P005	1680 hp natural gas Waukesha compressor engine	04/04/14
P006	1680 hp natural gas Waukesha compressor engine	04/04/14
P007	1680 hp natural gas Waukesha compressor engine	04/04/14
P008	1680 hp natural gas Waukesha compressor engine	04/04/14
P009	1680 hp natural gas Waukesha compressor engine	04/04/14
P015	215 hp flash gas compressor engine	03/20/14
P801	Equipment fugitive emissions leaks	04/04/14
T001	Condensate and reduced water tanks 04/04/14	

- 74. PTIO P0114578 requires the emissions from EUs P001, P003 and P009 not to exceed 0.99 lb/hr for NOx, 0.94 lb/hr for CO and 0.22lb/hr for VOC.
- 75. On December 8, 2014, E2 Appalachian conducted an emission test for EU P003 and the emissions rate was 0.58 lb/hr for VOC, in excess of the PTIO limits. On December 21, 2015, E2 Appalachian conducted a second emission test for EU P003 and the emissions rate was 0.49 lb/hr for VOC, in excess of the PTIO limits. E2 Appalachian conducted a re-test on July 6, 2016 and EU P003 passed for VOC.
- 76. On December 21, 2015, E2 Appalachian conducted an emission test for EU P009 and the emissions rate was 1.27 lb/hr for NOx and 0.34 lb/hr for VOC, in excess of the PTIO limits. E2 Appalachian conducted a re-test on July 14, 2016 and EU P009 passed for NOx and VOC.
- 77. On March 18, 2016, E2 Appalachian conducted an emission test for EU P001 and the emissions rate was 2.1 lb/hr for NOx 0.98 lb/hr and for CO, in excess of the

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PTIO limits. E2 Appalachian conducted a re-test on July 6, 2016 and EU P001 passed for NOx and CO.

- 78. The excess emissions were violations of the terms and conditions of PTIO P0114578 and ORC § 3704.05(C). SEDO sent NOV letters to E2 Appalachian for these violations on January 30, 2015 and April 22, 2016.
- 79. PTIO P0114578 required E2 Appalachian to conduct an initial performance test for EU P015 no later than 180 days after the initial startup (July 14, 2014) of the emissions unit. E2 Appalachian failed to conduct the performance test for EU P015 by January 10, 2015, in violation of the terms and conditions of PTIO P0114578 and ORC § 3704.05(C). SEDO sent a NOV letter to E2 Appalachian for these violations on September 20, 2016.
- 80. PTIO P0114578 required E2 Appalachian to conduct an initial performance test for EUs P001, P002, P007 and P009 no later than 180 days after the initial startup of the emissions units. E2 Appalachian conducted the performance tests for EUs P001, P002, P007 and P009 later than the December 28, 2014 deadline, in violation of the terms and conditions of PTIO P0114578 and ORC § 3704.05(C). E2 Appalachian conducted the initial stack test on March 18, 2015 for EU P001, December 22, 2015 for P002, March 18, 2016 for EU P007, and December 21, 2015 for EU P009. SEDO sent a NOV letter to E2 Appalachian for these violations on September 20, 2016.
- 81. PTIO P0114578 required E2 Appalachian to submit a comprehensive written report of the results of the emission test(s) to Ohio EPA within 30 days following completion of the test(s). E2 Appalachian submitted the reports late, in violation of the terms and conditions of PTIO P0114578 and ORC § 3704.05(C) for the following EUs:

EU	Test Date	Date Report Received	Days Late
P002	12/22/15	04/04/16	74
P003	12/08/14	01/23/15	19
P003	12/21/15	04/04/16	75
P004	12/10/14	01/23/15	17
P005	12/10/14	01/23/15	17
P006	12/10/14	01/23/15	17
P008	12/11/14	01/23/15	13
P009	12/21/15	04/04/16	75

- 82. E2 Appalachian has confirmed that EU P015 was commissioned but never operated. E2 Appalachian reports that EU P015 was removed from the Reusser facility on or about March 20, 2016 and notification of removal was confirmed via Air Services electronic filing on May 1, 2017.
- 83. PTIO P0114578 requires E2 Appalachian to maintain records of all of the inspections and treatments of EU F001. E2 Appalachian reports that, in violation of the

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terms and conditions of PTIO P0114578 and ORC  $\S$  3704.05(C), it failed to maintain the required records.

- 84. PTIO P0114578 requires E2 Appalachian to maintain records of all the inspections of the EU P801 components for leaks. E2 Appalachian reports that, in violation of the terms and conditions of PTIO P0114578 and ORC § 3704.05(C), it failed to maintain the required records.
- 85. As of the date of these Orders, all violations referenced above for the Reusser facility have been abated or, with respect to Finding Nos. 83 and 84, E2 Appalachian reports they have been abated.

# Upper Hill Facility (Facility ID # 0661005010)

86. The following emissions units at the Upper Hill facility are the subject of these Orders and are subject to Ohio EPA rules and regulations.

EUs ID	Company Description	Date Installed
F001	Unpaved roadways and parking areas	01/16/2014
P001	1680 hp natural gas Waukesha compressor engine	01/16/2014
P002	1680 hp natural gas Waukesha compressor engine	01/16/2014
P003	1680 hp natural gas Waukesha compressor engine	01/16/2014
P004	1680 hp natural gas Waukesha compressor engine	01/16/2014
P005	1680 hp natural gas Waukesha compressor engine	01/16/2014
P006	1680 hp natural gas Waukesha compressor engine	01/16/2014
P007	1680 hp natural gas Waukesha compressor engine	01/16/2014
P008	1680 hp natural gas Waukesha compressor engine	01/16/2014
P009	1680 hp natural gas Waukesha compressor engine	01/16/2014
P010	215 hp flash gas compressor engine 01/21/2014	
P011	215 hp flash gas compressor engine 01/21/2014	
P801	Equipment fugitive emissions leaks 04/04/2014	
T001	Condensate and produced water tank 04/04/2014	

- 87. PTIO P0114939 requires the emissions from EUs P003, P004 and P009 not to exceed 0.99 lb/hr for NOx, 0.94 lb/hr for CO and 0.22lb/hr for VOC.
- 88. On July 15, 2014, E2 Appalachian conducted an emission test for EU P009 and the emissions rate was 1.96 lb/hr for CO, in excess of the PTIO limits. E2 Appalachian conducted a re-test on November 6, 2014 and EU P009 passed for CO.
- 89. On November 10, 2014, E2 Appalachian conducted an emission test for EU P004 and the emissions rate was 2.68 lb/hr for NOx, in excess of the PTIO limits. E2 Appalachian conducted a re-test on December 13, 2016 for EU P004 and emissions rate 1.3 lb/hr for NOx and 1.7 lb/hr for CO, in excess of the PTIO limits. SEDO sent a NOV letter to E2 Appalachian for these violations in January 2017 and requested a compliance

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plan.

- 90. On April 29, 2016, E2 Appalachian conducted an emission test for EU P003 and the emissions rates were 11.75 lb/hr for NOx and 2.08 lb/hr for CO, in excess of the PTIO limits. E2 Appalachian conducted a re-test on December 13, 2016 for EU P003, with passing results.
- 91. The excess emissions are violations of the terms and conditions of PTIO P0114939 and ORC § 3704.05(C), SEDO sent NOV letters to E2 Appalachian for these violations on January 12, 2014, September 26, 2014 and July 7, 2016.
- 92. PTIO P0114939 required E2 Appalachian to conduct an initial performance test for EUs P010 and P011 no later than 180 days after the initial startup (January 21, 2014 for both EUs) of the emissions units. E2 Appalachian failed to conduct the performance test for EU P010 and P011 by July 21, 2014, in violation of the terms and conditions of PTIO P0114939 and ORC § 3704.05(C). SEDO sent a NOV letter to E2 Appalachian for these violations on September 19, 2016. E2 Appalachian conducted a test on December 12, 2016 for EU P010 with passing results. E2 Appalachian reports that EU P011 was removed from the facility on March 20, 2016 and its removal was confirmed via Air Services on June 26, 2017.
- 93. PTIO P0114939 required E2 Appalachian to conduct an initial performance test for EUs P001 to P008 no later than 180 days after the initial startup of the emissions units. E2 Appalachian conducted the performance tests for EUs P001 to P008 later than the July 15, 2014 deadline, in violation of the terms and conditions of PTIO P0114939 and ORC § 3704.05(C). E2 Appalachian conducted the initial stack test on May 28, 2015 for EU P001, November 12, 2014 for EU P002, November 13, 2014 for EU P003, November 10, 2014 for EU P004, November 18, 2015 for EU P005, May 27, 2015 for EU P006, and November 6, 2014 for EUs P007 and P008. SEDO sent a NOV letter to E2 Appalachian for these violations on September 19, 2016.
- 94. PTIO P0114939 required E2 Appalachian to submit a comprehensive written report of the results of the emission test(s) to Ohio EPA within 30 days following completion of the test(s). E2 Appalachian submitted the reports late, in violation of the terms and conditions of PTIO P0114939 and ORC § 3704.05(C) for the following EUs:

EU	Test Date	Date Report Received	Days Late
P001	05/28/15	08/18/15	52
P002	11/12/14	12/15/15	3
P003	11/13/14	12/15/15	2
P003	04/29/16	05/31/16	2
P004	11/10/14	01/06/15	27
P005	11/18/15	07/14/16	209
P006	05/27/15	08/18/15	53
P007	11/06/14	12/15/15	7

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P008	11/06/14	12/15/15	7
P009	11/06/14	12/15/15	7

- 95. PTIO P0114939 requires E2 Appalachian to maintain records of all inspections of the EU B801 components for leaks. E2 Appalachian reports that, in violation of the terms and conditions of PTIO P0114939 and ORC § 3704.05(C), it failed to maintain the required records.
- 96. PTIO P0114939 requires E2 Appalachian to maintain records of all the inspections and treatments of EU F001. E2 Appalachian reports that, in violation of the terms and conditions of PTIO P0114939 and ORC § 3704.05(C), it failed to maintain the required records.
- 97. PTIO P0114939 requires E2 Appalachian to maintain records of all the inspections and maintenance of the VRU and low pressure flare controlling emissions from EU T001. E2 Appalachian reports that, in violation of the terms and conditions of PTIO P0114939 and ORC § 3704.05(C), it failed to maintain the required records.
- 98. As of the date of these Orders, all violations referenced above for the Upper Hill facility have been abated or, with respect to Finding Nos. 95, 96 and 97, E2 Appalachian reports they have been abated except for the completion of maintenance for EU P004 consistent with the compliance plan submitted via correspondence to Ohio EPA dated February 21, 2017. E2 Appalachian reports that EU P004 will not be operated until necessary maintenance is complete and EU P004 operates in compliance with applicable requirements.
- 99. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with the following Orders and their relation to benefits to the people of the State to be derived from such compliance.

### V. ORDERS

The Director hereby issues the following Orders:

- 1. Within sixty (60) days of the effective date of these Orders, Respondents shall submit, to Ohio EPA, for those applications for modifications already submitted as well as those applications that need to be submitted, administrative modifications to its PTIOs to include or update the leak detection requirements at Crum, Upper Hill, Batesville, Reusser, and the Borton facilities. The leak detection requirements should include the development and implementation of a site-specific leak detection and repair program for ancillary equipment using the use of a FLIR camera or other approved equipment to detect leaks at the facilities.
- 2. In lieu of paying twenty-five thousand dollars (\$25,000) of a civil penalty, Respondents shall, within thirty (30) days after the effective date of these Orders, jointly

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remit \$25,000 to a recipient designated by Ohio EPA to fund a supplemental environmental project (SEP). The SEP will provide funding for equipment and training needs for local responders in Monroe County that will aid them in future emergency incidents in the county.

3. Should Respondents fail to fund the SEP within the required time frame set forth in Order No. 4, E2 Ohio shall immediately pay to Ohio EPA the remaining \$25,000 of the civil penalty. The official check shall be submitted to Carol Butler, or her successor, together with a letter identifying EnLink, E2 Ohio, and E2 Appalachian to:

Ohio EPA
Office of Fiscal Administration
P.O. Box 1049
Columbus, Ohio 43216-1049

### VI. TERMINATION

Respondents' obligations under these Orders shall terminate when Respondents certify in writing and demonstrate to the satisfaction of Ohio EPA that Respondents have performed all obligations under these Orders, these obligations have been embedded in operation permits, and the Chief of Ohio EPA's Division of Air Pollution Control acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondents of the obligations that have not been performed, in which case Respondents shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by EnLink to Ohio EPA and shall be signed by a responsible official of EnLink. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(F)(1) for a corporation, or a corporate officer who is in charge of a principal business function of EnLink.

### VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, operations by Respondents.

### VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement

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of any other statutes or regulations applicable to Respondents.

### IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

### X. NOTICE

All documents required to be submitted by Respondents pursuant to these Orders shall be addressed to:

Ohio EPA Southeast District Office 2195 Front Street Logan, Ohio 43138 Attention: Melisa Witherspoon

and to:

Ohio EPA
Division of Air Pollution Control
P.O. Box 1049
Columbus, Ohio 43216-1049
Attention: Jim Kavalec, Manager
Compliance and Enforcement Section

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

# XI. RESERVATION OF RIGHTS

Ohio EPA and Respondents each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

### XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondents consent to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondents' liability for the violations specifically cited herein.

Respondents hereby waive the right to appeal the issuance, terms and conditions, and service of these Orders and Respondents hereby waive any and all rights

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ORDERED AND AGREED:

Senior Vice President - Operations

Title

Respondents may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondents agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondents retain the right to intervene and participate in such appeal. In such an event, Respondents shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

# XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

# XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

# Ohio Environmental Protection Agency Craig W. Butler Director AGREED: EnLink Midstream Operating, LP Signature Mike LeBlanc Printed or Typed Name

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Title

E2 Ohio Compression LLC	
Signature	7/19/2017 Date
Mike LeBlanc	
Printed or Typed Name	
Senior Vice President - Operations Title	
E2 Appalachian Ohio Compression LLC	
Signature	7/19/2017
Cignature	Date '
Mike LeBlanc	
Printed or Typed Name	
Senior Vice President - Operations	