Texas Commission on Environmental Quality
INTEROFFICE MEMORANDUM

TO: Office of Chief Clerk DATE: April 20, 2015

FROM: Jennifer Furrow
Staff Attorney
Environmental Law Division

SUBJECT: Backup Documents Filed for Consideration of Hearing Requests at Agenda

Applicant: Luminant Generation Company, LLC
Proposed Permit No.: New Source Review Authorization No. 933
Program: Air
Docket No.: TCEQ Docket No. 2015-0496-AIR

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application:

- The summary of the technical review of the permit renewal application.
- The MAERT and special conditions that will be incorporated into the renewal permit.
- The compliance summary of the applicant.

# Permit Renewal
# Source Analysis & Technical Review

| | | | |
|---|---|---|---|
| Company | **Luminant Generation Company LLC** | Permit Number | **933** |
| City | **Tatum** | Project Number | **206457** |
| County | **Rusk** | Account Number | **RL-0020-K** |
| Project Type | **Renewal** | Regulated Entity Number | **RN102583093** |
| Project Reviewer | **Ms. Laura Gibson, P.E.** | Customer Reference Number | **CN603256413** |
| Site Name | **Martin Lake Steam Electric Station** | | |

**Project Overview**

The applicant has requested a renewal of authorization to operate its Martin Lake Steam Electric Station (MLSES), which generates electricity for the grid using three lignite/western coal-fired steam boilers. The permit also authorizes three auxiliary fuel oil-fired boilers, emergency generators, material storage and handling and maintenance, startup, and shutdown (MSS) emissions.

The permit was last renewed on January 24, 2005. Permit actions since that time are:

- Alteration issued October 21, 2005, changing Special Conditions to allow for use of Continuous Opacity Monitoring System (COMS) and Continuous Emissions Monitoring System (CEMS) to demonstrate compliance with acid gas requirements.
- Alteration issued June 18, 2008, to identify and quantify existing mercury (Hg) emissions on the Maximum Allowable Emission Rates Table (MAERT).
- Amendment issued December 16, 2011, to identify and quantify MSS emissions.

The applicant has requested the following revisions with this renewal:

- reduce annual nitrogen oxide ($NO_x$) to reflect the acid rain requirements in Title 40 Code of Federal Regulations (40 CFR) § 76.7(a)(1)),
- revise particulate matter (PM) and sulfur dioxide ($SO_2$) emission factors for auxiliary No. 2 fuel fired boilers due to EPA update of AP-42 Section 1.3 in May 2010,
- revise Special Condition No. 4 to replace the average subbituminous coal characteristics requirements with a reference to the requirement for CEMS in Special Condition 7. CEMS requires continuous monitoring of emissions as compared to the MAERT; and MAERT values were calculated based on the (now removed) average subbituminous coal characteristics; so the requirements / emissions have not changed.
- Incorporate Standard Permit Registration No. 85302 (mercury sorbent injection) by reference.

The applicant has not requested any increases in emission rates nor changed the character of the emissions.

**Emission Summary**

| Air Contaminant | Current Allowable Emission Rates (tpy) | Proposed Allowable Emission Rates (tpy) | Change in Allowable Emission Rates (tpy) |
|---|---|---|---|
| PM | 11,212.81 | 11,212.81 | 0.00 |
| $PM_{10}$* | 11,212.81 | 11,208.98 | -3.83 |
| $PM_{2.5}$* | --- | 11,208.14 | --- |
| VOC | 621.7 | 621.7 | 0.00 |
| $NO_X$ | 50,439.01 | 44,835.01 | -5,604.00 |
| CO | 120,549.01 | 120,549.01 | 0.00 |
| $SO_2$ | 134,502.01 | 134,502.01 | 0.00 |
| Lead (Pb) | 3.0 | 3.0 | 0.00 |
| Ammonia/Urea | 0.36 | 0.36 | 0.00 |
| Sulfuric Acid ($H_2SO_4$) | 753.0 | 753.0 | 0.00 |
| Hydrogen Fluoride (HF) | 2,331.0 | 2,331.0 | 0.00 |
| Hg | 2.4 | 2.4 | 0.00 |

* $PM_{10}$ and $PM_{2.5}$ are being speciated for the Coal-Fired Units for the first time upon this renewal but have always been emitted.

**Compliance History Evaluation - 30 TAC Chapter 60 Rules**

| | |
|---|---|
| A compliance history report was reviewed on: | **October 21, 2014** |
| Compliance period: | **September 1, 2009 – August 31, 2014** |
| Site rating & classification: | **0.02, High** |
| Company rating & classification: | **0.00, High** |
| If the rating is 50<RATING<55, what was the outcome, if any, based on the findings in the formal report: | **NA** |
| Has the permit changed on the basis of the compliance history or rating? | **No** |

**Public Notice Information - 30 TAC Chapter 39 Rules**

| Rule Citation | Requirement | |
|---|---|---|
| 39.403 | Date Application Received: | **March 3, 2014** |
| | Date Administratively Complete: | **March 10, 2014** |
| | Small Business Source? | **No** |
| | Date Leg Letters mailed: | **March 10, 2014** |
| 39.603 | Date Published: | **April 2, 2014** |
| | Publication Name: | ***Henderson Daily News*** |
| | Pollutants: | Carbon monoxide, nitrogen oxides, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide, organic compounds, sulfuric acid, and hazardous air pollutants including (but not limited to) hydrogen fluoride and lead. |
| | Date Affidavits/Copies Received: | **April 14, 2014** |
| | Is bilingual notice required? | **Yes** |
| | Language: | **Spanish** |
| | Date Published: | **April 2, 2014** |
| | Publication Name: | ***La Opinion*** |
| | Date Affidavits/Copies Received: | **April 14, 2014** |
| | Date Certification of Sign Posting / Application Availability Received: | **May 1, 2014** |
| 39.604 | Public Comments Received? | **Yes** |
| | Hearing Requested? | **Yes** |
| | Meeting Request? | **No** |
| | Date Meeting Held: | **NA** |
| | Date Response to Comments sent to OCC: | **March 3, 2015** |
| | Request(s) withdrawn? | **No** |
| | Date Withdrawn: | **NA** |
| | Consideration of Comments: | **Permit unchanged.** |
| | Is 2nd Public Notice required? | **No** |
| 39.419 | If no, give reason: | **Renewal meets criteria of 30 TAC § 39.419(e).** |
| 39.421 | Request for Reconsideration Received? | **No** |
| | Final Action: | |
| | Are letters Enclosed? | **NA** |

**Renewal Requirements - 30 TAC Chapter 116 Rules**

| Rule Citation | Requirement | |
|---|---|---|
| 116.315(a) | Date of permit expiration: | **September 3, 2014** |
| 116.310 | Date written notice of review was mailed: | **NA** |
| 116.315(a) | Date application for Renewal (PI-1R) received: | **March 3, 2014** |
| 116.311(a)(1) | Do dockside vessel emissions associated with the facility comply with all regulations? | **NA** |
| 116.311(a)(2) | Is the facility being operated in accordance with all requirements and conditions of the existing permit, including representations in the application for permit to construct and subsequent amendments, and any previously granted renewal, unless otherwise authorized for a qualified facility? | **Yes** |
| | If no, explain: | NA |
| 116.311(a)(3) | Subject to NSPS? | **Yes** |
| | Subparts **A** & **D, Fossil-Fuel-Fired Steam Generators** | |
| 116.311(a)(4) | Subject to NESHAPS? | **No** |
| | Subparts & | |
| 116.311(a)(5) | Subject to NESHAPS (MACT) for source categories? | **Yes** |
| | Subparts **A, DDDDD,** Industrial, Commercial, and Institutional Boilers and Process Heaters, Major Sources **& UUUUU,** Coal- and Oil-Fired Electric Utility Steam Generating Units | |
| 116.311(a)(6) | Does this project require case-by-case MACT? | **No** |
| 116.311(b) | Was there a condition of air pollution that had to be addressed during this project review? | **No** |
| | If yes, explain: | **NA** |
| 116.314(a) | Does the facility meet all permit renewal requirements? | **Yes** |
| 116.313 | Permit Renewal Fee: $ **10,000** Fee certification: | **R420343** |
| | Applicable Outstanding Fees: | **None** |

**Title V Applicability - 30 TAC Chapter 122 Rules**

| Rule Citation | Requirement | |
|---|---|---|
| 122.10(13) | **Title V applicability:** The site is a major source with Federal Operating Permit No. O53. | |
| 122.10(13)(A) | Is the site a major source under FCAA Section 112(b)? | **Yes** |
| | Does the site emit 10 tons or more of any single HAP? | **Yes** |
| | Does the site emit 25 tons or more of a combination? | **Yes** |
| 122.10(13)(C) | Does the site emit 100 tons or more of any air pollutant? | **Yes** |
| 122.10(13)(D) | Is the site a non-attainment major source? | **No** |
| 122.602 | **Periodic Monitoring (PM) applicability:** Periodic monitoring is applicable because this site is subject to 30 TAC Chapter 122. CEMS will measure $NO_x$, $SO_2$, and diluent gases from the utility boiler on a 3 hour average based on at least four data points per hour. Recordkeeping and CEMS (for some emissions) are used for periodic monitoring of other emissions, which are determined based on the duration and frequency of each event. | |
| 122.604 | **Compliance Assurance Monitoring (CAM) applicability:** The site is a major source for which CAM is applicable. To satisfy CAM requirements, Special Condition Nos. 6 and 7 require COMS and CEMS to record and monitor opacity and $SO_2$ emission rate, respectively. | |

**Request for Comments**

| Received From | Program/Area Name | Reviewed By / Date | Comments |
|---|---|---|---|
| Region: | **5** | **Jason Sutherland / 10/7/14** | **No comments on the draft permit.** |
| City: | **Tatum** | | **No local program.** |
| County: | **Rusk** | | **No local program.** |
| ADMT: | | | **No modeling issues.** |
| EB&T: | | | **No EB&T issues.** |
| Toxicology: | | | **No toxicology issues.** |
| Compliance: | | | **No compliance issues.** |
| Legal: | | | **RTC to Legal 1/23/15.** |
| Comment resolution and/or unresolved issues: None | | | |

**Process/Project Description**

The three primary (8,530 MMBtu, 40 CFR 60 Subpart D) boilers subject to this permit are authorized to burn lignite mined locally as well as western coal, with fuel-oil allowed for start-up and for supplemental use, such as for flame stabilization. These boilers produce steam to drive turbines for electrical production. Two 250 MMBtu/hr (each) Subpart D start-up boilers are authorized to burn No. 2 fuel oil on a short-term basis.

The three lignite and coal-fired boilers were authorized for construction in 1973-74. In September 1994, permit revisions were issued authorizing PM and $SO_2$ short-term emissions limits to be calculated based on a three-hour average. (These revisions were to place the emission limits more in line with EPA test methods and NSPS limitations.) Senate Bill 7 (SB7, passed in 1999) allowed Standard Permits for Pollution Control Projects (PCP) to be issued for facilities such as Martin Lake, in which $NO_x$ control equipment was authorized which caused collateral increases in CO. This PCP Standard Permit Registration No. 54809 was authorized in May 2003.

With the current action, the applicant is renewing its authorization to operate the three boilers and their supporting equipment. Supporting equipment authorized by Permit No. 933 are two No. 2 fuel oil-fired auxiliary start-up boilers; limestone handling systems; and certain MLSES planned MSS activities.

The applicant is also reducing annual $NO_x$ emission rates for the boilers to reflect the annual average $NO_x$ emission rate limitation of 0.40 lb/MMBtu requirement of 40 CFR 60 Subpart D.

Emission rates for the auxiliary boilers are revised to reflect updated emission factors in AP-42 for Section 1.3, Fuel Oil Combustion. These updated factors, which now include minute amounts of condensable particulate matter, were published by EPA in May 2010. Note that these emissions have always been present but are just now being included in the emission factor. Per provisions of the preamble to the Public Notice Rule and the Vicki Hsu memo governing permit renewals, emission rate changes without BACT or impacts review are allowed to be made at a renewal, when due to a newly published EPA emission factor in which emissions previously present but not previously shown are quantified. These changes are not to be considered increases per the preamble to the Public Notice Rule adopted November 9, 2001. The new factors also reflect a decrease in short-term $SO_2$ emissions from the Auxiliary Boilers.

The applicant requested that Special Condition No. 3 (now Special Condition No. 4 due to renumbering) be simplified to reflect the use of CEMS by removing the required average characteristics for subbituminous coal. This is still protective of health and welfare because Special Condition No. 6 requires the use of CEMS to monitor $SO_2$ emission rates on a three-hour average as well as corrective action if $SO_2$ rates exceed those found in the MAERT.

The applicant has requested incorporation by reference of the PCP Standard Permit Registration No. 85302 for Mercury Sorbent Injection, issued July 2008 and last revised in April 2014. The following table is added in Special Condition No. 17:

| Facilities | Standard Permit Type | Registration Number |
|---|---|---|
| Mercury Sorbent Injection System and Storage Silos | Pollution Control Project | 85302 |

**Pollution Prevention, Sources, and Controls - [30 TAC 116.311(b)(2)]**

The following is a discussion of pollution prevention, sources, and controls as currently exist at the plant and as discussed for previous permit actions. No changes are occurring to these items (aside from removing the reference to sulfur content of subbituminous coal thus requiring CEMS $SO_2$ monitoring in Special Condition No. 4). The controls are reasonable given the age, type, and size of the sources.

*Coal-Fired Steam Generators, Auxiliary Boilers, and Controls*

Emissions from these sources must comply with the limits in the applicable source categories' MACTs: 40 CFR 63, Subparts DDDDD and UUUUU, which became effective since the last NSR permit renewal.

**PM**

Emission controls for particulate matter is established by NSPS Subpart D at 0.10 lb/MMBtu. This is unchanged from the original authorization. In order to achieve this, flue gases from the steam generators are routed through electrostatic precipitators (ESPs), which remove most of the fly ash from the gas stream. The flue gas is then exhausted through stacks. The fly ash collected by the ESP is pneumatically conveyed to storage site prior to loading for disposal or sales. The sludge from the flue gas desulfurization (FGD) system is prepared for disposal or sales at a solids handling building. Ammonium sulfate is utilized to improve the efficiency of the ESP and limestone is used to make the scrubbing slurry for the FGD system. The limestone handling system uses a surfactant spray system for dust suppression.

**$NO_X$**

Short-term $NO_X$ emissions are established at 0.60 lb/MMBtu, based on NSPS Subpart D, which was in force at the time of construction. The annual average $NO_X$ limitations are reducing with this renewal from 0.45 lb/MMBtu to 0.40 lb/MMBtu, averaged over three hours, as specified in the EPA acid rain permit for the boilers. Standard Permit Registration No. 54809, issued May 2003, authorizes a low-$NO_X$ concentric fired burners system with overfired air. Each burner is operated with a computer control system to optimize boiler operation and reduce $NO_X$ emissions.

**CO**

CO emissions were established in PCP Standard Permit Registration No. 54809 granted under 30 TAC §116.617 (SB7) granted in May 2003. CO emissions were determined based on a CO concentration of 1000 parts per million volume dry (ppmvd), 30 day average, corrected to 7% oxygen. CO emissions are limited by good combustion practices.

**VOC**

Maximum VOC emissions as shown in the MAERT were determined based on an annual average of 0.07 lb VOC / ton lignite fired and an hourly maximum of 0.7 lb VOC / ton lignite fired. These factors are from the EPA's July 2001 publication "Uncontrolled Emission Factor Listing for Criteria Air Pollutants" and VOC emissions are limited by good combustion practices.

**$SO_2$ and $H_2SO_4$**

Emissions of $SO_2$ are established at 1.2 lb/MMBtu based on NSPS Subpart D. Control of $SO_2$ also serves to control $H_2SO_4$. This is met by using low sulfur fuels, operating a CEMS to monitor $SO_2$ emissions from the boilers, and performing FGD using a limestone slurry scrubber.

**Hg**

Mercury emissions must comply with the applicable MACT for source categories. PCP Standard Permit Registration No. 85302 authorizes a Mercury Sorbent Injection system to control mercury.

**Pb**

Lead emissions must comply with the applicable MACT for source categories. Lead is controlled with the 99% lead removal efficiency ESP such that Pb limits on the MAERT are not exceeded.

*Fugitives and MSS Activities*

During planned periods of MSS, control devices and process equipment are operated outside the optimal range they were designed to work most effectively and it is technically infeasible to meet the primary BACT emission rates. Therefore, secondary BACT limits are necessary during these periods. These secondary BACT requirements are designed to limit emissions during planned MSS activities and are included in Special Condition Nos. 9 through 16. Special Condition No. 10 specifies limitations and conditions to minimize emissions and opacity from the main utility steam generators when the ESP is not energized and not operational. This condition defines the startup and shutdown periods for the utility steam

generators and limits these periods and periods of maintenance to minimize the amount of time the equipment is outside the optimal performance mode. Emissions resulting from MSS activities must be minimized by using good air pollution control practices and safe operating practices. The MSS special conditions also outline steps for demonstrating compliance with the emission limits for other planned general maintenance activities at the site which include verifying all inherently low-emitting (ILE) activities on an annual basis and evaluating emissions from non-ILE activities for each calendar month. The other authorized ILE and non-ILE planned general maintenance activities at the site listed in Attachments A and B result in only small quantities of emissions, generally occur infrequently, and generally last for a relatively short period of time. Minimizing emissions using good air pollution control procedures and best management practices are considered BACT for these activities.

**Permit Concurrence and Related Authorization Actions**

| | |
|---|---|
| Is the applicant in agreement with special conditions? | **Yes** |
| Company representative(s): | **Paul Barnes** |
| Contacted Via: | **Email** |
| Date of contact: | **10/1/2014, 11/12/14** |
| Other permit(s) or permits by rule affected by this action: | **Yes** |
| List permit and/or PBR number(s) and actions required or taken: | PCP Standard Permit Registration No. 85302 is incorporated by reference and remains the proper authorization for the Mercury Sorbent Injection System. |

| | | | |
|---|---|---|---|
| | 4/14/15 | | |
| Project Reviewer | Date | Team Leader/Section Manager/Backup | Date |

Emission Sources - Maximum Allowable Emission Rates

Permit Number 933

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

| Emission Point No. (1) | Source Name (2) | Air Contaminant Name (3) | Emission Rates (4) | |
|---|---|---|---|---|
| | | | lbs/hour (5) | TPY (6) |
| S-1 | Steam Generator Unit No. 1 (Coal-Fired Steam Generator) | CO | 9,174 | 40,183 |
| | | $NO_x$ | 5,118 | 14,945 |
| | | PM | 853 | 3,736 |
| | | $PM_{10}$ | 853 | 3,736 |
| | | $PM_{2.5}$ | 853 | 3,736 |
| | | PM (7) | 2,940 | -- |
| | | $SO_2$ | 10,236 | 44,834 |
| | | VOC | 473 | 207 |
| | | Pb | 2.2 | 1 |
| | | Pb (7) | 4.56 | -- |
| | | HF | 177 | 777 |
| | | $H_2SO_4$ | 57 | 251 |
| | | Hg | 0.91 | 0.80 |
| S-2 | Steam Generator Unit No. 2 (Coal-Fired Steam Generator) | CO | 9,174 | 40,183 |
| | | $NO_x$ | 5,118 | 14,945 |
| | | PM | 853 | 3,736 |
| | | $PM_{10}$ | 853 | 3,736 |
| | | $PM_{2.5}$ | 853 | 3,736 |
| | | PM (7) | 2,940 | -- |
| | | $SO_2$ | 10,236 | 44,834 |
| | | VOC | 473 | 207 |

Emission Sources - Maximum Allowable Emission Rates

| Emission Point No. (1) | Source Name (2) | Air Contaminant Name (3) | Emission Rates (4) | |
|---|---|---|---|---|
| | | | lbs/hour (5) | TPY (6) |
| | | Pb | 2.2 | 1 |
| | | Pb (7) | 4.56 | -- |
| | | HF | 177 | 777 |
| | | $H_2SO_4$ | 57 | 251 |
| | | Hg | 0.91 | 0.80 |
| S-3 | Steam Generator Unit No. 3 (Coal-Fired Steam Generator) | CO | 9,174 | 40,183 |
| | | $NO_x$ | 5,118 | 14,945 |
| | | PM | 853 | 3,736 |
| | | $PM_{10}$ | 853 | 3,736 |
| | | $PM_{2.5}$ | 853 | 3,736 |
| | | PM (7) | 2,940 | -- |
| | | $SO_2$ | 10,236 | 44,834 |
| | | VOC | 473 | 207 |
| | | Pb | 2.2 | 1 |
| | | Pb (7) | 4.56 | -- |
| | | HF | 177 | 777 |
| | | $H_2SO_4$ | 57 | 251 |
| | | Hg | 0.91 | 0.80 |
| S1-A and B | Auxiliary Boiler A (250 MMBtu/hr) | CO | 90.6 | -- |
| | | $NO_x$ | 43.5 | -- |
| | | PM | 6.0 | -- |
| | | $PM_{10}$ | 6.0 | -- |
| | | $PM_{2.5}$ | 6.0 | -- |

Emission Sources - Maximum Allowable Emission Rates

| Emission Point No. (1) | Source Name (2) | Air Contaminant Name (3) | Emission Rates (4) | |
|---|---|---|---|---|
| | | | lbs/hour (5) | TPY (6) |
| | | $SO_2$ | 128.7 | -- |
| | | VOC | 3.6 | -- |
| | | Pb | < 0.01 | -- |
| S1-A and B | Auxiliary Boiler B (250 MMBtu/hr) | CO | 90.6 | -- |
| | | $NO_x$ | 43.5 | -- |
| | | PM | 6.0 | -- |
| | | $PM_{10}$ | 6.0 | -- |
| | | $PM_{2.5}$ | 6.0 | -- |
| | | $SO_2$ | 128.7 | -- |
| | | VOC | 3.6 | -- |
| | | Pb | < 0.01 | -- |
| LMA1F | Limestone System - Transfer From Railcar to A Side Receiving Hopper | PM | 0.02 | 0.01 |
| | | $PM_{10}$ | 0.01 | 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMA2F | Limestone System - Transfer From Receiving Hopper A to Conveyor C-30 | PM | 0.02 | 0.01 |
| | | $PM_{10}$ | 0.01 | 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMA3F | Limestone System - Transfer From Conveyor C-30 to Conveyor C-4 | PM | 0.02 | 0.01 |
| | | $PM_{10}$ | 0.01 | 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMA4F | Limestone System - Transfer From Conveyor C-30 to Pile | PM | 0.05 | 0.03 |
| | | $PM_{10}$ | 0.02 | 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |

Emission Sources - Maximum Allowable Emission Rates

| Emission Point No. (1) | Source Name (2) | Air Contaminant Name (3) | Emission Rates (4) | |
|---|---|---|---|---|
| | | | lbs/hour (5) | TPY (6) |
| LMA5WF and LMA5MF | Limestone System - Limestone Storage Pile A Wind and Maintenance Fugitives (8) | PM | 0.29 | 1.28 |
| | | $PM_{10}$ | 0.15 | 0.64 |
| | | $PM_{2.5}$ | 0.02 | 0.09 |
| LMA6F | Limestone System Underground Reclaim Transfer to Conveyor 2A | PM | 0.01 | 0.01 |
| | | $PM_{10}$ | < 0.01 | 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMB1F | Limestone System - Transfer From Railcar B Side Receiving Hopper | PM | 0.02 | 0.01 |
| | | $PM_{10}$ | 0.01 | 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMB2F | Limestone System - Transfer From Receiving Hopper B to Conveyor C-1A | PM | 0.02 | 0.01 |
| | | $PM_{10}$ | 0.01 | 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMB3F | Limestone System – Tower No. 1 Transfers (C-1A and C-4) to Conveyor C-1B | PM | 0.02 | 0.01 |
| | | $PM_{10}$ | 0.01 | < 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMB4F | Limestone System - Shuttle Conveyor C-1B to Conveyor C-1C | PM | 0.10 | 0.03 |
| | | $PM_{10}$ | 0.05 | 0.01 |
| | | $PM_{2.5}$ | 0.01 | < 0.01 |
| LMB5F | Limestone System - Conveyor C-1C Transfer to System B Storage Pile | PM | 0.50 | 0.13 |
| | | $PM_{10}$ | 0.24 | 0.06 |
| | | $PM_{2.5}$ | 0.04 | 0.01 |
| LMB6F | Limestone System - Transfer From System B to Storage Pile to | PM | 0.08 | 0.13 |
| | | $PM_{10}$ | 0.04 | 0.06 |

Emission Sources - Maximum Allowable Emission Rates

| Emission Point No. (1) | Source Name (2) | Air Contaminant Name (3) | Emission Rates (4) | |
|---|---|---|---|---|
| | | | lbs/hour (5) | TPY (6) |
| | Conveyor C-2 | $PM_{2.5}$ | 0.01 | 0.01 |
| LMB7F | Limestone System – Tower No. 2 Transfer From Conveyor C-2 to C-3 | PM | 0.01 | 0.01 |
| | | $PM_{10}$ | < 0.01 | 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMB8F | Limestone System - Conveyors C-3 and C-24 Transfers into Surge Bins | PM | < 0.01 | 0.01 |
| | | $PM_{10}$ | < 0.01 | < 0.01 |
| | | $PM_{2.5}$ | < 0.01 | < 0.01 |
| LMB9F | Limestone System - Transfer From Ball Mill Surge Silos to Conveyors A, B, C, and D | PM | 0.06 | 0.13 |
| | | $PM_{10}$ | 0.03 | 0.06 |
| | | $PM_{2.5}$ | < 0.01 | 0.01 |
| LMB10F | Limestone System - Transfer From Conveyors A, B, C, and D into Ball Mills | PM | 0.06 | 0.13 |
| | | $PM_{10}$ | 0.03 | 0.06 |
| | | $PM_{2.5}$ | < 0.01 | 0.01 |
| MSS-FUG | MSS Fugitives (8) | VOC | 61.84 | 0.70 |
| | | PM | 4.09 | 2.86 |
| | | Ammonia/Urea | 26.15 | 0.36 |
| | | $NO_x$ | < 0.01 | < 0.01 |
| | | CO | < 0.01 | < 0.01 |
| | | $SO_2$ | < 0.01 | < 0.01 |

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
$NO_x$ - total oxides of nitrogen
$SO_2$ - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including $PM_{10}$ and $PM_{2.5}$, as represented

Emission Sources - Maximum Allowable Emission Rates

| | |
|---|---|
| $PM_{10}$ | - total particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$, as represented |
| $PM_{2.5}$ | - particulate matter equal to or less than 2.5 microns in diameter |
| CO | - carbon monoxide |
| Pb | - lead |
| Hg | - mercury |
| HF | - hydrogen fluoride |
| $H_2SO_4$ | - sulfuric acid mist |

(4) The pound per hour and ton per year emission limits specified in the MAERT for this facility includes emissions from the facility during both normal operations and planned MSS activities, unless otherwise noted.

(5) Compliance with $NO_x$, PM, $PM_{10}$, $SO_2$, VOC, Pb, HF, $H_2SO_4$, and Hg hourly emissions is determined on a block 3-hour average basis. Compliance with the CO hourly emission limit is determined on a 30-day average basis. For each pollutant whose emissions during planned MSS activities are measured using a CEMS, the MSS lb/hr limits apply only during each clock hour that includes one or more minutes of MSS activities. During all other clock hours, the normal lb/hr limits apply.

(6) Compliance with all annual emission limits is based on a calendar year. Only for purposes of demonstrating compliance for EPNs S1-A and B, total combined actual annual emissions from EPNs S1-A and B, S-1, S-2, and S-3 shall not exceed the total allowable annual emission rates for EPNs S-1, S-2, and S-3.

(7) MSS hourly emission limit only. The tpy emission limit represented in the MAERT for this facility includes emissions from the facility during both normal operations and planned MSS activities.

(8) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: Xxx, 2015

## Special Conditions

Permit Number 933

1. This permit authorizes emissions only from those emission points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," (MAERT) and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating conditions specified in this permit. Also, this permit authorizes the emissions from planned maintenance, startup and shutdown (MSS).

2. These facilities shall comply with all applicable requirements of the following regulations.

   A. Steam Generator Unit Nos. 1, 2, and 3, Emission Point Nos. (EPNs) S-1, S-2, and S-3 shall comply with the U. S. Environmental Protection Agency (EPA) Standards of Performance for New Stationary Sources (NSPS) in Title 40 Code of Federal Regulations (40 CFR) Part 60:

      (1) Subpart A - General Provisions;

      (2) Subpart D: Standards of Performance for Fossil Fuel-Fired Steam Generators.

   B. EPNs S-1, S-2, S-3 shall comply with the EPA National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Source Categories in 40 CFR Part 63:

      (1) Subpart A - General Provisions; and

      (2) Subpart UUUUU - Coal- and Oil-Fired Electric Utility Steam Generating Units.

   C. Auxiliary Boilers A and B, EPNs S1-A and B, shall comply with the EPA NESHAPS for Source Categories in 40 CFR Part 63:

      (1) Subpart A - General Provisions; and

      (2) Subpart DDDDD– Industrial, Commercial, and Institutional Boilers and Process Heaters, Major Sources.

   D. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated.

3. Emission records for EPNs S-1, S-2, and S-3 shall be retained by the owner or operator of this facility for at least five years and shall be made available to representatives of the Texas Commission on Environmental Quality or local air pollution control programs with jurisdiction.

4. The following fuels are authorized to be fired in Steam Generator Unit Nos. 1, 2, and 3:

   A. No. 2 fuel oil or natural gas (for ignitor fuels only),

   B. Wilcox formation lignite, and

   C. Subbituminous coal.

   Wilcox formation lignite may be fired by itself or in any mixture with subbituminous coal, provided the requirements for sulfur dioxide ($SO_2$) emissions found in Special Condition

No. 7 are met. The subbituminous coal may be fired by itself if it meets the requirements for $SO_2$ emissions in Special Condition No. 7.

5. Particulate emissions from the limestone handling system are to be controlled by a surfactant spray dust suppression system.

6. Steam Generator Unit Nos. 1, 2, and 3 shall measure and record opacity with a continuous opacity monitoring system (COMS) that shall be located, installed, and operated in accordance with 40 CFR Part 60. Corrective action is to be taken immediately if the block three-hour average opacity exceeds 20 percent, except during periods of start-up, shutdown, or maintenance.

7. Steam Generator Unit Nos. 1, 2, and 3 shall measure and record the $SO_2$ emission rate with a continuous emissions monitoring system (CEMS) which shall be located, installed, and operated in accordance with 40 CFR Part 75. Corrective action is to be taken immediately if the block three-hour average $SO_2$ emission rate exceeds the hourly emission rate listed in the maximum allowable emission rates table, except during periods of start-up, shutdown, or maintenance.

8. Steam Generator Unit Nos. 1, 2, and 3 are also authorized under Permit Number 45428 as electric generating facilities (EGFs). As such, they are authorized to participate in the cap and trade program authorized in Title 30 Texas Administrative Code (30 TAC) Chapter 101.

**Routine Maintenance, Startup, and Shutdown**

9. This permit authorizes the emissions from the planned MSS activities listed in Attachment A, Attachment B, or the MAERT attached to this permit. Attachment A identifies the inherently low emitting (ILE) planned maintenance activities that this permit authorizes to be performed. Attachment B identifies the planned maintenance activities that are non-ILE planned MSS activities that this permit authorizes to be performed.

10. Opacity greater than 20 percent from EPNs S-1, S-2, and S-3 is authorized when the permit holder complies with the MSS duration limitations and other applicable work practices identified below.

    A. Emissions during planned startup and shutdown activities shall be minimized by limiting the duration of operation in planned startup and shutdown mode as follows:

        (1) A planned startup of the EGF with EPNs S-1, S-2, and S-3 is defined as the period that begins when the induced draft fans start operation and ends when the utility boiler reaches stable load and the electrostatic precipitator (ESP) operation has been fully optimized.

            (a) A planned startup of the EGF shall not exceed 24 hours, except as allowed in Special Condition No. 10 A(1)(b).

(b) An extended planned startup is defined as a startup that lasts more than 24 hours. The total amount of incremental time the extended startups exceed 24 hours shall not exceed a combined 900 hours on an annual calendar basis for EPNs S-1, S-2, and S-3.

(2) A planned shutdown of the EGF with EPNs S-1, S-2, and S-3 is defined as the period that begins when the ESP is partially or completely de-energized due to reaching its minimum operating temperature and ends when a temperature has been reached that allows personnel to enter the structure and conduct maintenance activities.

(a) A planned shutdown of the EGF shall not exceed 24 hours, except as allowed in Special Condition No. 10 A(2)(b).

(b) An extended planned shutdown is defined as a shutdown that lasts more than 24 hours. The total amount of incremental time the extended shutdowns exceed 24 hours shall not exceed a combined 900 hours on an annual calendar basis for EPNs S-1, S-2, and S-3.

B. Emissions during planned startup and shutdown activities shall be minimized by employing the following work practices. EGFs with EPNs S-1, S-2 and S-3 will comply with the boiler and ESP manufacturer's operating procedures or the permittee's written Standard Operating Procedures manual during planned MSS, and will operate in a manner consistent with those procedures to minimize opacity by placing the ESP into service as soon as practical during planned startups or removing the ESP from service as late as possible during planned shutdowns, once the air heater outlet temperature is between 180 and 260 degrees F, but not longer than the durations identified in Special Condition No. 10 A. The manufacturer's operating procedures or written Standard Operating Procedure manual shall be located on-site and available to the TCEQ regional investigator.

C. Periods of opacity greater than 20 percent from EPNs S-1, S-2, and S-3 from planned online and offline maintenance activities identified in Attachment A or B are authorized for no more than 535 hours in a calendar year per unit.

D. The permit holder shall keep records to identify periods of planned MSS, the opacity measured by the COMS for the duration of the planned MSS activities, and the work practices in Special Condition No. 10 B are followed during the planned MSS activities for the purpose of demonstrating compliance with this permit special condition.

E. For periods of maintenance, startup, and shutdown other than those subject to Paragraphs A - C of this condition, 30 TAC § 111.111, 111.153, and Chapter 101, Subchapter F apply.

11. When a planned maintenance activity identified in Attachment B is associated with a VOC liquid storage facility and may result in VOC emissions from that facility, the permit holder shall not open that facility to the atmosphere in connection with the planned maintenance activity until the VOC liquids are removed from that facility to the maximum extent practicable.

12. No vacuum pump on a vacuum truck that is used to move solids (such as ash) during planned maintenance activities shall be operated unless the vacuum system exhaust is routed to a filtering system.

13. Vacuum trucks that are used to move liquids during planned maintenance activities shall utilize submerged loading.

14. Compliance with the emissions limits for planned MSS activities identified in the MAERT attached to this permit may be demonstrated as follows.

    A. For each pollutant emitted during ILE planned maintenance activities, the permit holder shall annually confirm the continued validity of the estimated potential to emit represented in the permit application for all ILE planned maintenance activities. The total emissions from all ILE planned maintenance activities (See Attachment A) shall be considered to be no more than the estimated potential to emit for those activities that are represented in the permit application.

    B. For each pollutant emitted during non-ILE planned MSS activities (See Attachment B) whose emissions are measured using a CEMS, as per Special Condition No. 15 A, the permit holder shall compare the pollutant's short-term (hourly) emissions during planned MSS activities as measured by the CEMS to the applicable short-term planned MSS emissions limit in the MAERT.

    C. For each pollutant emitted during non-ILE planned MSS activities (See Attachment B) whose emissions occur through a stack, but are not measured using CEMS as per Special Condition No. 15 A, the permit holder shall determine the total emissions of the pollutant through the stack that result from such non-ILE planned MSS activities in accordance with Special Condition No. 15 B.

    D. For each pollutant emitted during non-ILE planned MSS activities (See Attachment B) whose emissions do not occur through a stack, the permit holder shall do the following for each calendar month.

        (1) Determine the total emissions of the pollutant from such non-ILE planned MSS activities in accordance with Special Condition No. 15 B.

        (2) Once monthly emissions have been determined in accordance with Special Condition No. 14 D(1) for 12 months after the MSS permit amendment has been issued, the permit holder shall compare the sum of the rolling 12-month emissions for the pollutant for all non-ILE planned MSS activities to the annual emissions limit for the pollutant in the MAERT.

15. The permit holder shall determine the emissions during planned MSS activities for use in Special Condition No. 14 as follows.

    A. For each pollutant whose emissions during normal facility operations are measured with a CEMS that has been certified to measure the pollutant's emissions over the entire range of a planned MSS activity, the permit holder shall measure the emissions of the pollutant during the planned MSS activity using the CEMS.

B. For each pollutant not described in Special Condition No. 15 A, the permit holder shall calculate the pollutant's emissions during all occurrences of each type of planned MSS activity for each calendar month using the frequency of the planned MSS activity identified in work orders or equivalent records and the emissions of the pollutant during the planned MSS activity as represented in the planned MSS permit application. In lieu of using the emissions of the pollutant during the planned MSS activity as represented in the planned MSS permit application to calculate such emissions, the permit holder may determine the emissions of the pollutant during the planned MSS activity using an appropriate method, including but not limited to, any of the methods described in paragraphs 1 through 4 below, provided that the permit holder maintains appropriate records supporting such determination:

(1) Use of emission factor(s), facility-specific parameter(s), and/or engineering knowledge of the facility's operations.

(2) Use of emissions data measured (by a CEMS or during emissions testing) during the same type of planned MSS activity occurring at or on a similar facility, and correlation of that data with the facility's relevant operating parameters, including, but not limited to, electric load, temperature, fuel input, and fuel sulfur content.

(3) Use of emissions testing data collected during a planned MSS activity occurring at or on the facility, and correlation of that data with the facility's relevant operating parameters, including, but not limited to, electric load, temperature, fuel input, and fuel sulfur content.

(4) Use of parametric monitoring system (PEMS) data applicable to the facility.

16. With the exception of the emission limits in the MAERT attached to this permit, the permit conditions relating to planned MSS activities do not become effective until 60 days after issuance of the permit amendment that added such conditions.

17. The following facilities are authorized by Standard Permits. These authorizations are listed here for reference purposes only.

| Facilities | Standard Permit Type | Registration Number |
|---|---|---|
| Mercury Sorbent Injection System and Storage Silos | Pollution Control Project | 85302 |

Date: xxx, 2015

Attachment A

Permit No. 933

Inherently Low Emitting (ILE) Planned Maintenance Activities

| Planned Maintenance Activity | Emissions | | | | | |
|---|---|---|---|---|---|---|
| | $NH_3$/Urea | VOC | NOx | CO | PM | $SO_2$ |
| Miscellaneous particulate filter maintenance[1] | | | | | X | |
| Maintenance of storage vessels storing material with vapor pressure <0.5 psia | X | X | | | | |
| Maintenance of storage vessels storing gasoline or other material with vapor pressure >0.5 psia that does not require clearing of the vessels to allow for entry of personnel | X | X | | | | |
| Boiler general maintenance[2] | | | | | X | |
| Management of sludge from pits, ponds, sumps, and water conveyances[3] | | X | | | | |
| Inspection, repair, replacement, adjusting, testing, and calibration of analytical equipment, process instruments including sight glasses, meters, gauges, CEMS, PEMS. | | X | X | X | | X |
| Deslagging of boiler[4] | | X | X | X | X | |
| Material handling system maintenance[5] | | | | | X | |
| Small equipment and fugitive component repair/replacement in VOC and NH3 service[6] | X | X | | | | |

Notes:

1. Includes, but is not limited to, baghouse filters, ash silo/transfer filters, coal handling filters, process-related building air filters, and combustion turbine air intake filters.
2. Includes pre-heater basket handling and maintenance, refractory change-out, fan maintenance and balancing, damper, air heater, and soot blower maintenance, and any other general boiler maintenance that does not exceed the worst-case emissions representation in the application.
3. Includes, but is not limited to, management by vacuum truck/dewatering of materials in open pits and ponds, and sumps, tanks and other closed or open vessels. Materials managed include water and sludge mixtures containing miscellaneous VOCs such as diesel, lube oil, and other waste oils.
4. Includes, but is not limited to, explosive blasting, clinker shooting, and other boiler

deslagging activities; does not include dry abrasive blasting that may occur in boilers.

5. Material handling system equipment includes, but is not limited to, silos, transport systems, coal bunkers, coal crushing equipment, coal handling, nuvafeeders, hoppers, FGD sludge handling system. Materials handled include coal, ash, limestone, gypsum, mercury, and sorbents.
6. Includes, but is not limited to, (i) repair/replacement of pumps, compressors, valves, pipes, flanges, transport lines, filters and screens in natural gas, fuel oil, diesel oil, ammonia, lube oil, and gasoline service, (ii) vehicle and mobile equipment maintenance that may involve small VOC emissions, such as oil changes, transmission service, and hydraulic system service, and (iii) off-line $NO_x$ control device maintenance (including maintenance of the anhydrous ammonia systems and aqueous ammonia systems associated with SCR systems and SNCR systems).

Dated: xxx, 2015

Attachment B

Permit No. 933

Non-Inherently Low Emitting Planned MSS Activities

| Planned Maintenance Activity | Emissions | | | | | | |
|---|---|---|---|---|---|---|---|
| | EPN | $NH_3$/Urea | VOC | $NO_X$ | CO | PM | $SO_2$ |
| Combustion optimization[1] | S-1, S-2, S-3 | | X | X | X | X | X |
| Vacuum truck solids loading[2] | MSSFUG | | | | | X | |
| Vacuum truck solids unloading | MSSFUG | | | | | X | |
| Maintenance of storage vessels storing gasoline or other material with vapor pressure >0.5 psia that requires clearing of the vessels to allow for entry of personnel | MSSFUG | X | X | | | | |
| Flue gas conditioning system maintenance – unit online | S-1, S-2, S-3 | X | | | | X | |
| Flue gas conditioning system maintenance fugitives - unit offline[3] | MSSFUG | X | | | | X | |
| $NO_x$ control device maintenance – unit online | S-1, S-2, S-3 | X | | X | | | |
| PM control device maintenance – unit online | S-1, S-2, S-3 | | | | | X | |
| $SO_2$ control device maintenance – unit online | S-1, S-2, S-3 | | | | | | X |
| Smoke test of boiler | S-1, S-2, S-3 | | | X | X | X | X |
| Smoke test of boiler fugitives | MSSFUG | | | X | X | X | X |
| Testing of oil guns[4] | S-1, S-2, S-3 | | X | X | X | X | X |
| Use of fans during maintenance - unit offline | S-1, S-2, S-3 | | | | | X | |
| Main unit planned startup and planned shutdown | S-1, S-2, S-3 | X | X | X | X | X | X |

Notes:

1. Includes, but is not limited to, (i) leak and operability checks (e.g., turbine over-speed tests, troubleshooting), (ii) balancing, and (iii) tuning activities that occur during seasonal tuning or after the completion of initial construction, a combustor change-out, a major repair, maintenance to a combustor, or other similar circumstances.
2. Includes site-wide solids vacuuming operations (e.g., SCR, baghouse, ESP, ducts, furnace, loop seals, stripper coolers, and airlocks).
3. Includes, but is not limited to, maintenance of anhydrous ammonia systems and aqueous ammonia systems used to condition flue gas before it is controlled by a PM control device.
4. Includes readiness testing for oil firing system.

Dated: xxx, 2015

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# Compliance History Report

**PUBLISHED** Compliance History Report for CN603256413, RN102583093, Rating Year 2014 which includes Compliance History (CH) components from September 1, 2009, through August 31, 2014.

| | | | |
|---|---|---|---|
| **Customer, Respondent, or Owner/Operator:** | CN603256413, Luminant Generation Company LLC | **Classification:** HIGH | **Rating:** 0.02 |
| **Regulated Entity:** | RN102583093, MARTIN LAKE STEAM ELECTRIC STATION | **Classification:** HIGH | **Rating:** 0.00 |
| **Complexity Points:** | 20 | **Repeat Violator:** NO | |
| **CH Group:** | 06 - Electric Power Generation | | |
| **Location:** | 8850 FM 2658 N TATUM, TX 75691-3401, RUSK COUNTY | | |
| **TCEQ Region:** | REGION 05 - TYLER | | |

**ID Number(s):**

**PUBLIC WATER SYSTEM/SUPPLY** REGISTRATION 2010040
**WASTEWATER** PERMIT WQ0001784000
**WASTEWATER** EPA ID TX0054500
**AIR NEW SOURCE PERMITS** PERMIT 930
**AIR NEW SOURCE PERMITS** PERMIT 932
**AIR NEW SOURCE PERMITS** PERMIT 933
**AIR NEW SOURCE PERMITS** PERMIT 45428
**AIR NEW SOURCE PERMITS** ACCOUNT NUMBER RL0020K
**AIR NEW SOURCE PERMITS** AFS NUM 4840100011
**AIR NEW SOURCE PERMITS** REGISTRATION 71236
**AIR NEW SOURCE PERMITS** REGISTRATION 74655
**AIR NEW SOURCE PERMITS** REGISTRATION 76793
**AIR NEW SOURCE PERMITS** REGISTRATION 79854
**AIR NEW SOURCE PERMITS** REGISTRATION 82110
**AIR NEW SOURCE PERMITS** REGISTRATION 48642
**AIR NEW SOURCE PERMITS** REGISTRATION 85302
**AIR NEW SOURCE PERMITS** REGISTRATION 38456
**AIR NEW SOURCE PERMITS** REGISTRATION 86592
**AIR NEW SOURCE PERMITS** REGISTRATION 95118
**AIR NEW SOURCE PERMITS** REGISTRATION 98824
**AIR NEW SOURCE PERMITS** REGISTRATION 98823
**AIR NEW SOURCE PERMITS** REGISTRATION 98842
**AIR NEW SOURCE PERMITS** REGISTRATION 97134
**AIR NEW SOURCE PERMITS** REGISTRATION 98822
**AIR NEW SOURCE PERMITS** REGISTRATION 117525
**AIR OPERATING PERMITS** ACCOUNT NUMBER RL0020K
**AIR OPERATING PERMITS** PERMIT 53
**STORMWATER** PERMIT TXR05W670
**STORMWATER** PERMIT TXR150013636
**WASTEWATER LICENSING** LICENSE WQ0001784000
**WATER LICENSING** LICENSE 2010040
**IHW CORRECTIVE ACTION** SOLID WASTE REGISTRATION # (SWR) 31277
**AIR EMISSIONS INVENTORY** ACCOUNT NUMBER RL0020K
**INDUSTRIAL AND HAZARDOUS WASTE** EPA ID TXD000821306
**INDUSTRIAL AND HAZARDOUS WASTE** SOLID WASTE REGISTRATION # (SWR) 31277
**POLLUTION PREVENTION PLANNING** ID NUMBER P01733
**LEAKING PETROLEUM STORAGE TANKS REMEDIATION** ID NUMBER 111462

**Compliance History Period:** September 01, 2009 to August 31, 2014 **Rating Year:** 2014 **Rating Date:** 09/01/2014

**Date Compliance History Report Prepared:** January 22, 2015

**Agency Decision Requiring Compliance History:** Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.

**Component Period Selected:** September 01, 2009 to August 31, 2014

**TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.**

**Name:** TCEQ Staff Member **Phone:** (512) 239-1000

## Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period? YES
2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
3) If **YES** for #2, who is the current owner/operator? N/A
4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A

5) If **YES**, when did the change(s) in owner or operator occur? N/A

## Components (Multimedia) for the Site Are Listed in Sections A - J

**A. Final Orders, court judgments, and consent decrees:**
N/A

**B. Criminal convictions:**
N/A

**C. Chronic excessive emissions events:**
N/A

**D. The approval dates of investigations (CCEDS Inv. Track. No.):**

| | | |
|---|---|---|
| Item 1 | September 14, 2009 | (764793) |
| Item 2 | September 15, 2009 | (762747) |
| Item 3 | September 28, 2009 | (764590) |
| Item 4 | October 05, 2009 | (775746) |
| Item 5 | October 06, 2009 | (776112) |
| Item 6 | October 13, 2009 | (777644) |
| Item 7 | October 15, 2009 | (779017) |
| Item 8 | October 21, 2009 | (779142) |
| Item 9 | October 31, 2009 | (778686) |
| Item 10 | November 04, 2009 | (779375) |
| Item 11 | November 10, 2009 | (781099) |
| Item 12 | November 16, 2009 | (781096) |
| Item 13 | November 18, 2009 | (782919) |
| Item 14 | November 24, 2009 | (782963) |
| Item 15 | November 30, 2009 | (782804) |
| Item 16 | December 08, 2009 | (783183) |
| Item 17 | December 16, 2009 | (783070) |
| Item 18 | January 05, 2010 | (785600) |
| Item 19 | February 18, 2010 | (785959) |
| Item 20 | April 13, 2010 | (790932) |
| Item 21 | April 27, 2010 | (798904) |
| Item 22 | May 10, 2010 | (791546) |
| Item 23 | May 20, 2010 | (799323) |
| Item 24 | May 26, 2010 | (802453) |
| Item 25 | May 28, 2010 | (803360) |
| Item 26 | June 09, 2010 | (824423) |
| Item 27 | June 21, 2010 | (825174) |
| Item 28 | June 28, 2010 | (827650) |
| Item 29 | June 29, 2010 | (826409) |
| Item 30 | June 30, 2010 | (826045) |
| Item 31 | July 13, 2010 | (830020) |
| Item 32 | July 15, 2010 | (830472) |
| Item 33 | July 16, 2010 | (841077) |
| Item 34 | July 29, 2010 | (825318) |
| Item 35 | August 25, 2010 | (841686) |
| Item 36 | December 21, 2010 | (869895) |
| Item 37 | December 29, 2010 | (884782) |
| Item 38 | January 11, 2011 | (884687) |
| Item 39 | January 18, 2011 | (890735) |
| Item 40 | January 20, 2011 | (887877) |
| Item 41 | January 26, 2011 | (885918) |
| Item 42 | January 31, 2011 | (891499) |
| Item 43 | February 02, 2011 | (893327) |
| Item 44 | February 08, 2011 | (893162) |
| Item 45 | February 23, 2011 | (893428) |

| | | |
|---|---|---|
| Item 46 | March 07, 2011 | (894731) |
| Item 47 | March 31, 2011 | (906527) |
| Item 48 | April 05, 2011 | (907763) |
| Item 49 | April 18, 2011 | (912764) |
| Item 50 | April 25, 2011 | (908718) |
| Item 51 | April 28, 2011 | (913088) |
| Item 52 | May 06, 2011 | (914332) |
| Item 53 | May 23, 2011 | (913341) |
| Item 54 | May 26, 2011 | (919782) |
| Item 55 | June 27, 2011 | (934196) |
| Item 56 | July 06, 2011 | (935246) |
| Item 57 | July 18, 2011 | (935170) |
| Item 58 | July 25, 2011 | (941311) |
| Item 59 | August 01, 2011 | (943024) |
| Item 60 | August 25, 2011 | (949529) |
| Item 61 | October 11, 2011 | (958422) |
| Item 62 | October 12, 2011 | (959125) |
| Item 63 | October 21, 2011 | (958521) |
| Item 64 | November 21, 2011 | (969276) |
| Item 65 | November 28, 2011 | (969221) |
| Item 66 | December 06, 2011 | (969302) |
| Item 67 | December 19, 2011 | (970371) |
| Item 68 | January 04, 2012 | (970499) |
| Item 69 | January 10, 2012 | (976342) |
| Item 70 | January 27, 2012 | (982070) |
| Item 71 | February 10, 2012 | (983785) |
| Item 72 | February 14, 2012 | (983826) |
| Item 73 | March 13, 2012 | (993853) |
| Item 74 | June 04, 2012 | (1007858) |
| Item 75 | June 29, 2012 | (1014111) |
| Item 76 | August 13, 2012 | (1023985) |
| Item 77 | October 25, 2012 | (1040937) |
| Item 78 | December 04, 2012 | (1041039) |
| Item 79 | December 12, 2012 | (1050045) |
| Item 80 | February 05, 2013 | (1056190) |
| Item 81 | February 12, 2013 | (1056071) |
| Item 82 | February 21, 2013 | (1057271) |
| Item 83 | August 27, 2013 | (1115614) |
| Item 84 | August 28, 2013 | (1115773) |
| Item 85 | September 18, 2013 | (1120517) |
| Item 86 | September 20, 2013 | (1120687) |
| Item 87 | October 15, 2013 | (1121889) |
| Item 88 | October 29, 2013 | (1124575) |
| Item 89 | November 13, 2013 | (1124704) |
| Item 90 | February 26, 2014 | (1150576) |
| Item 91 | February 27, 2014 | (1151593) |
| Item 92 | March 24, 2014 | (1157156) |
| Item 93 | March 25, 2014 | (1157613) |
| Item 94 | March 26, 2014 | (1157626) |
| Item 95 | May 14, 2014 | (1165337) |
| Item 96 | May 28, 2014 | (1171091) |
| Item 97 | June 05, 2014 | (1150125) |
| Item 98 | August 28, 2014 | (1190552) |

## E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

## F. Environmental audits:

N/A

**G. Type of environmental management systems (EMSs):**
N/A

**H. Voluntary on-site compliance assessment dates:**
N/A

**I. Participation in a voluntary pollution reduction program:**
N/A

**J. Early compliance:**
N/A

**Sites Outside of Texas:**
N/A