

# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO

EFS Midstream LLC

AUTHORIZING THE OPERATION OF

Pawnee Treating Plant  
Crude Petroleum and Natural Gas

LOCATED AT

Bee County, Texas

Latitude 28° 37' 20" Longitude 97° 59' 33"

Regulated Entity Number: RN100226505

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No:   O3136   Issuance Date: \_\_\_\_\_

---

For the Commission

## Table of Contents

<b>Section</b>	<b>Page</b>
General Terms and Conditions .....	1
Special Terms and Conditions .....	1
Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting .....	1
New Source Review Authorization Requirements .....	8
Compliance Requirements.....	8
Protection of Stratospheric Ozone.....	9
Temporary Fuel Shortages (30 TAC § 112.15) .....	10
Permit Location.....	10
Permit Shield (30 TAC § 122.148) .....	10
Attachments .....	11
Applicable Requirements Summary .....	12
Permit Shield.....	17
New Source Review Authorization References.....	21
Schedules.....	25
Appendix A .....	32
Acronym List .....	33

## **General Terms and Conditions**

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

## **Special Terms and Conditions: Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting**

1. Permit holder shall comply with the following requirements:
  - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
  - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.

- C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
  - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
  - E. Emission units subject to 40 CFR Part 63, Subparts HH and ZZZZ, as identified in the attached Applicable Requirements Summary table, are subject to 30 TAC Chapter 113, Subchapter C, §113.390 and §113.1090, respectively, which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)

3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
  - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:
      - (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
      - (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum

required value does not constitute creation of an alternative fuel.

- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
  - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
  - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement.

However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

B. For visible emissions from a building, enclosed facility, or other structure; the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
  - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
  - (2) Records of all observations shall be maintained.
  - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible

emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A)
  - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader
- C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:

- (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
  - (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
  - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- E. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
- (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
  - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
  - (iii) Title 30 TAC § 111.209 (relating to Exception for Disposal Fires)
  - (iv) Title 30 TAC § 111.211 (relating to Exception for Prescribed Burn)
  - (v) Title 30 TAC § 111.213 (relating to Exception for Hydrocarbon Burning)
  - (vi) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
  - (vii) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)
4. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
5. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

## **New Source Review Authorization Requirements**

6. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
7. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
8. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, material safety data sheets (MSDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

## **Compliance Requirements**

9. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
10. The permit holder shall adhere to the provisions in the Compliance Schedule attachment of this permit and submit certified progress reports consistent with

the schedule established under 30 TAC § 122.132(e)(4)(C) and including the information specified in 30 TAC § 122.142(e)(2). Those emission units listed in the Compliance Schedule attachment shall adhere with the requirements in the Compliance Schedule attachment until operating fully in compliance with the applicable requirements.

11. Use of Discrete Emission Credits to comply with the applicable requirements:
  - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) If applicable, offsets for Title 30 TAC Chapter 116
    - (iv) Temporarily exceed state NSR permit allowables
  - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
    - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
    - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
    - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

### **Protection of Stratospheric Ozone**

12. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone.
  - A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance

with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

- B. The permit holder shall comply with 40 CFR Part 82, Subpart H related to Halon Emissions Reduction requirements as specified in 40 CFR § 82.250 - § 82.270 and the applicable Part 82 Appendices.

### **Temporary Fuel Shortages (30 TAC § 112.15)**

- 13. The permit holder shall comply with the following 30 TAC Chapter 112 requirements:
  - A. Title 30 TAC § 112.15 (relating to Temporary Fuel Shortage Plan Filing Requirements)
  - B. Title 30 TAC § 112.16(a), (a)(1), and (a)(2)(B) - (C) (relating to Temporary Fuel Shortage Plan Operating Requirements)
  - C. Title 30 TAC § 112.17 (relating to Temporary Fuel Shortage Plan Notification Procedures)
  - D. Title 30 TAC § 112.18 (relating to Temporary Fuel Shortage Plan Reporting Requirements)

### **Permit Location**

- 14. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

### **Permit Shield (30 TAC § 122.148)**

- 15. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

## **Attachments**

**Applicable Requirements Summary**

**Permit Shield**

**New Source Review Authorization References**

**Schedules**

**Applicable Requirements Summary**

**Unit Summary .....13**

**Applicable Requirements Summary ..... 14**

Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

### Unit Summary

<b>Unit/Group/ Process ID No.</b>	<b>Unit Type</b>	<b>Group/Inclusive Units</b>	<b>SOP Index No.</b>	<b>Regulation</b>	<b>Requirement Driver</b>
FLARE-6	Flares	N/A	R111-1	30 TAC Chapter 111, Visible Emissions	No changing attributes.
GRP-GLYCOL	Glycol Dehydration	PRO GLYCOL1, PRO GLYCOL2	63HH-1	40 CFR Part 63, Subpart HH	No changing attributes.
COMP 32-9-B	SRIC Engines	N/A	63ZZZZ-1	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
COMP 33-9-C	SRIC Engines	N/A	63ZZZZ-2	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
COMP 34-9-D	SRIC Engines	N/A	63ZZZZ-3	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
COMP 35-9-E	SRIC Engines	N/A	63ZZZZ-4	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
COMP 36-9-F	SRIC Engines	N/A	63ZZZZ-5	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GEN-7A	SRIC Engines	N/A	63ZZZZ-4	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GEN-7B	SRIC Engines	N/A	63ZZZZ-4	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GEN-7C	SRIC Engines	N/A	63ZZZZ-4	40 CFR Part 63, Subpart ZZZZ	No changing attributes.

## Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
FLARE-6	EU	R111-1	OPACITY	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period, except for emission event emissions as provided in §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
GRP-GLYCOL	EU	63HH-1	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.764(e)(1)(ii) § 63.764(a) § 63.764(e)(1)	The actual average emissions of benzene from the glycol dehydration unit process vent are < 0.90 megagram/yr.	[G]§ 63.772(b)(2)	§ 63.760(a)(1)(ii) § 63.774(a) § 63.774(d)(1)(ii)	None
COMP 32-9-B	EU	63ZZZZ-1	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table2d.10 § 63.6595(a)(1) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j) § 63.6640(b)	For each existing non-emergency, non-black start 4SRB stationary RICE with a site rating less than or equal to 500 HP, located at an area source, you must comply with the requirements as specified in Table 2d.10.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§ 63.6625(j) § 63.6655(a) § 63.6655(a)(1) § 63.6655(d) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)
COMP 33-9-C	EU	63ZZZZ-2	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table2d.6 § 63.6595(a)(1) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j) § 63.6640(b)	For each existing non-emergency, non-black start 2SLB stationary RICE, located at an area source, you must comply with the requirements as specified in Table 2d.6.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§ 63.6625(j) § 63.6655(a) § 63.6655(a)(1) § 63.6655(d) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)
COMP 34-9-D	EU	63ZZZZ-3	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table2d.6 § 63.6595(a)(1) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j)	For each existing non-emergency, non-black start 2SLB stationary RICE, located at an area source, you must comply with the requirements as specified in Table 2d.6.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§ 63.6625(j) § 63.6655(a) § 63.6655(a)(1) § 63.6655(d) § 63.6655(e) § 63.6660(a) § 63.6660(b)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)

## Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 63.6640(b)			§ 63.6660(c)	
COMP 35-9-E	EU	63ZZZZ-4	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table2d.11 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j) § 63.6640(b)	For each existing non-emergency, non-black start 4SRB remote stationary RICE with a site rating greater than 500 HP, located at an area source, you must comply with the requirements as specified in Table 2d.11.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§ 63.6603(f) § 63.6625(j) § 63.6655(a) § 63.6655(a)(1) § 63.6655(d) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)
COMP 36-9-F	EU	63ZZZZ-5	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table2d.8 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j) § 63.6640(b)	For each existing non-emergency, non-black start 4SLB remote stationary RICE with a site rating greater than 500 HP, located at an area source, you must comply with the requirements as specified in Table 2d.8.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§ 63.6603(f) § 63.6625(j) § 63.6655(a) § 63.6655(a)(1) § 63.6655(d) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)
GEN-7A	EU	63ZZZZ-4	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table2d.11 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j) § 63.6640(b)	For each existing non-emergency, non-black start 4SRB remote stationary RICE with a site rating greater than 500 HP, located at an area source, you must comply with the requirements as specified in Table 2d.11.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§ 63.6603(f) § 63.6625(j) § 63.6655(a) § 63.6655(a)(1) § 63.6655(d) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)
GEN-7B	EU	63ZZZZ-4	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table2d.11 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j)	For each existing non-emergency, non-black start 4SRB remote stationary RICE with a site rating greater than 500 HP, located at an area source, you must comply with the requirements as specified	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§ 63.6603(f) § 63.6625(j) § 63.6655(a) § 63.6655(a)(1) § 63.6655(d) § 63.6655(e) § 63.6660(a) § 63.6660(b)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)

## Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 63.6640(b)	in Table 2d.11.a-c.		§ 63.6660(c)	
GEN-7C	EU	63ZZZZ-4	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table2d.11 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(j) § 63.6640(b)	For each existing non-emergency, non-black start 4SRB remote stationary RICE with a site rating greater than 500 HP, located at an area source, you must comply with the requirements as specified in Table 2d.11.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§63.6603(f) § 63.6625(j) § 63.6655(a) § 63.6655(a)(1) § 63.6655(d) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)

**Permit Shield**

**Permit Shield ..... 18**

## Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/ Inclusive Units		
AF V-50	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3.
AFULD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	Unloading facility is located in Bee County; an exempted covered attainment county.
BOILER 4	N/A	40 CFR Part 60, Subpart Dc	Steam boiler was constructed prior to and not modified/reconstructed after 06/09/1989.
COMP 32-9-B	N/A	40 CFR Part 60, Subpart JJJJ	Stationary non-emergency SI ICE was manufactured prior to 07/01/2008 and was not modified/reconstructed after 06/12/2006.
COMP 33-9-C	N/A	40 CFR Part 60, Subpart JJJJ	Stationary non-emergency SI ICE was manufactured prior to 07/01/2008 and was not modified/reconstructed after 06/12/2006.
COMP 34-9-D	N/A	40 CFR Part 60, Subpart JJJJ	Stationary non-emergency SI ICE was manufactured prior to 07/01/2008 and was not modified/reconstructed after 06/12/2006.
COMP 35-9-E	N/A	40 CFR Part 60, Subpart JJJJ	Stationary non-emergency SI ICE was manufactured prior to 07/01/2007 and was not modified/reconstructed after 06/12/2006.
COMP 36-9-F	N/A	40 CFR Part 60, Subpart JJJJ	Stationary non-emergency SI ICE was manufactured prior to 01/01/2008 and was not modified/reconstructed after 06/12/2006.
DIESLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	Loading/Unloading facility is located in Bee County; an exempted covered attainment county.
DIESTNK	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75m3.

## Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/ Inclusive Units		
FLARE-6	N/A	40 CFR Part 60, Subpart A	Flare is not used to comply with applicable subparts of 40 CFR Part 60 or Part 61.
FLARE-6	N/A	40 CFR Part 63, Subpart A	Flare is not used to comply with applicable subparts of 40 CFR Part 63.
GEN-7A	N/A	40 CFR Part 60, Subpart JJJJ	Stationary non-emergency SI ICE was manufactured prior to 07/01/2007 and was not modified/reconstructed after 06/12/2006.
GEN-7B	N/A	40 CFR Part 60, Subpart JJJJ	Stationary non-emergency SI ICE was manufactured prior to 07/01/2007 and was not modified/reconstructed after 06/12/2006.
GEN-7C	N/A	40 CFR Part 60, Subpart JJJJ	Stationary non-emergency SI ICE was manufactured prior to 07/01/2007 and was not modified/reconstructed after 06/12/2006.
LUBE V-40	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3.
LUBEULD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	Unloading facility is located in Bee County; an exempted covered attainment county.
MDEA V-21	N/A	40 CFR Part 60, Subpart K	Storage vessel capacity is less than 40000 gallons.
PRO AMINE	N/A	40 CFR Part 60, Subpart LLL	Amine unit was constructed prior to and not modified/reconstructed after 01/20/1984.
PW V-30	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 1589 m3 used for condensate stored prior to custody transfer.

### Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/ Inclusive Units		
PWLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	Loading facility is located in Bee County; an exempted covered attainment county.
SLOP V-27	N/A	40 CFR Part 60, Subpart K	Storage vessel capacity is less than 40000 gallons.
SLOPLD	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	Loading facility is located in Bee County; an exempted covered attainment county.

**New Source Review Authorization References**

**New Source Review Authorization References ..... 22**

**New Source Review Authorization References by Emission Unit..... 23**

## New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 5144A	Issuance Date: 05/04/2009
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.352	Version No./Date: 09/04/2000
Number: 106.355	Version No./Date: 11/01/2001
Number: 106.359	Version No./Date: 09/10/2013
Number: 106.454	Version No./Date: 07/08/1998
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000
Number: 52	Version No./Date: 11/25/1985

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
AF V-50	ANTIFREEZE TANK	106.478/09/04/2000
AFULD	ANTIFREEZE UNLOADING	106.478/09/04/2000
BOILER 4	STEAM BOILER	5144A
COMP 32-9-B	WAUKESHA F1197G 4SRB SI ICE	5144A
COMP 33-9-C	AJAX DPC 2SLB SI ICE	5144A
COMP 34-9-D	AJAX DPC 2SLB SI ICE	5144A
COMP 35-9-E	WAUKESHA L7042G 4SRB SI ICE	5144A
COMP 36-9-F	CATERPILLAR G3516LE 4SLB SI ICE	5144A
DIESLD	DIESEL LOADING/UNLOADING	52/11/25/1985
DIESTNK	DIESEL TANK	52/11/25/1985
FLARE-6	PLANT FLARE	5144A
GEN-7A	WAUKESHA L7042G 4SRB SI ICE	5144A
GEN-7B	WAUKESHA L7042G 4SRB SI ICE	5144A
GEN-7C	WAUKESHA L7042G 4SRB SI ICE	5144A
LUBE V-40	LUBE OIL TANK	106.472/09/04/2000
LUBEULD	LUBE OIL UNLOADING	106.472/09/04/2000
MDEA V-21	MDEA TANK	5144A
PRO AMINE	AMINE GAS SWEETENING UNIT	5144A

### **New Source Review Authorization References by Emissions Unit**

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

<b>Unit/Group/Process ID No.</b>	<b>Emission Unit Name/Description</b>	<b>New Source Review Authorization</b>
PRO GLYCOL1	GLYCOL GAS DEHYDRATION UNIT 1	5144A
PRO GLYCOL2	GLYCOL GAS DEHYDRATION UNIT 2	5144A
PW V-30	PRODUCED WATER TANK	5144A
PWLD	PRODUCED WATER LOADING	5144A
SLOP V-27	SLOP OIL TANK	5144A
SLOPLD	SLOP OIL LOADING	5144A

**Schedules**

**Compliance Schedule ..... 26**

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
<b>Unit/Group/ Process ID. No(s).</b>	<b>SOP Index No.</b>	<b>Pollutant</b>	<b>Applicable Requirement</b>	
			<b>Citation</b>	<b>Text Description</b>
PRO-AMINE	NSR 5144A	SO2	NSR 5144A	Special Condition #2 requires that the Tutweiler procedure be conducted weekly to measure the h2s concentration in the amine unit acid gas stream.
<b>2. Compliance Status Assessment Method and Records Location</b>				
<b>Compliance Status Assessment Method</b>			<b>Location of Records/Documentation</b>	
<b>Citation</b>	<b>Text Description</b>			
NSR 5144A	Weekly Tutweiler procedure measurement of the acid gas H2S concentration.		Pawnee Treating Plant office	
<b>3. Non-compliance Situation Description</b>				
The Tutweiler procedure measurement of the acid gas H2S concentration was not performed each week.				
<b>4. Corrective Action Plan Description</b>				
The NSR 5144A renewal and amendment application that was submitted to TCEQ on 12/12/2013 requested a change to the special conditions to allow the use of the stain tube procedure instead of the Tutweiler procedure.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
<b>1</b>	The stain tube procedure will be performed weekly after NSR 5144A is renewed and amended.			
<b>6. Previously Submitted Compliance Plan(s)</b>			<b>Type of Action</b>	<b>Date Submitted</b>
			N/A	
<b>7. Progress Report Submission Schedule</b>			Every 6 months after issuance of FOP O3136	

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
<b>Unit/Group/ Process ID. No(s).</b>	<b>SOP Index No.</b>	<b>Pollutant</b>	<b>Applicable Requirement</b>	
			<b>Citation</b>	<b>Text Description</b>
PRO-AMINE	NSR 5144A	SO2	NSR 5144A	Special Condition #4 requires that the incinerator operate with at least 150% excess air and the firebox temperature monitoring device be calibrated at least annually.
<b>2. Compliance Status Assessment Method and Records Location</b>				
<b>Compliance Status Assessment Method</b>			<b>Location of Records/Documentation</b>	
<b>Citation</b>	<b>Text Description</b>			
NSR 5144A	Excess air determination and temperature monitoring device calibration		Pawnee Treating Plant office	
<b>3. Non-compliance Situation Description</b>				
There is no measurement methodology required or performed to prove at least 150% excess air is achieved and the firebox temperature monitoring device was not always calibrated annually.				
<b>4. Corrective Action Plan Description</b>				
NSR 5144A renewal and amendment application that was submitted to TCEQ on 12/12/2013 requested the removal of the 150% excess air requirement from the special conditions and the firebox temperature monitoring device has now been calibrated.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
<b>1</b>	The unproven 150% excess air requirement will no longer be required after NSR 5144A is renewed and amended.			
<b>6. Previously Submitted Compliance Plan(s)</b>			<b>Type of Action</b>	<b>Date Submitted</b>
			N/A	
<b>7. Progress Report Submission Schedule</b>			Every 6 months after issuance of FOP O3136	

## Compliance Schedule

A. Compliance Schedule				
1. Specific Non-Compliance Situation				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
PRO- GLYCOL1 & PRO- GLYCOL2	NSR 5144A	HAPS	NSR 5144A	Special Condition #8 requires the no.2 glycol unit rich glycol flash tank vapor stream flow into the plant fuel system, with no mention of the same from the no.1 glycol unit.
2. Compliance Status Assessment Method and Records Location				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
NSR 5144A	Rich glycol flash tank vapor flow configuration records		Pawnee Treating Plant office	
3. Non-compliance Situation Description				
The rich glycol flash tank vapor streams from both glycol units flow to the flare instead of into the fuel gas system or elsewhere.				
4. Corrective Action Plan Description				
The NSR 5144A renewal and amendment application that was submitted to TCEQ on 12/12/2013 requested a change to the special conditions to allow the rich glycol flash tank vapor streams from both glycol units to flow to the flare instead of into the fuel gas system or elsewhere.				
5. List of Activities/Milestones to Implement the Corrective Action Plan				
1	The rich glycol flash tank vapor streams from both glycol units will flow to the flare before and after the renewal and amendment of NSR 5144A.			
6. Previously Submitted Compliance Plan(s)			Type of Action	Date Submitted
			N/A	
7. Progress Report Submission Schedule			Every 6 months after issuance of FOP O3136	

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
<b>Unit/Group/ Process ID. No(s).</b>	<b>SOP Index No.</b>	<b>Pollutant</b>	<b>Applicable Requirement</b>	
			<b>Citation</b>	<b>Text Description</b>
GEN-7A, GEN-7B, & GEN-7C	NSR 5144A	HAPS	NSR 5144A	Special Condition #9 requires that no more than two of the three electric generators simultaneously operate.
<b>2. Compliance Status Assessment Method and Records Location</b>				
<b>Compliance Status Assessment Method</b>			<b>Location of Records/Documentation</b>	
<b>Citation</b>	<b>Text Description</b>			
NSR 5144A	Electric generator operating records		Pawnee Treating Plant office	
<b>3. Non-compliance Situation Description</b>				
There are times when all three electric generators are required to operate.				
<b>4. Corrective Action Plan Description</b>				
NSR 5144A renewal and amendment application that was submitted to TCEQ on 12/12/2013 requested a change to the special conditions to allow all three electric generators to simultaneously operate.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
<b>1</b>	All three electric generators will be able to be operated simultaneously after NSR 5144A is renewed and amended.			
<b>6. Previously Submitted Compliance Plan(s)</b>			<b>Type of Action</b>	<b>Date Submitted</b>
			N/A	
<b>7. Progress Report Submission Schedule</b>			Every 6 months after issuance of FOP O3136	

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
<b>Unit/Group/ Process ID. No(s).</b>	<b>SOP Index No.</b>	<b>Pollutant</b>	<b>Applicable Requirement</b>	
			<b>Citation</b>	<b>Text Description</b>
PRO-AMINE	NSR 5144A	SO2	NSR 5144A	Special Condition #11 requires that there be no bypass for the vapors routing to the incinerator.
<b>2. Compliance Status Assessment Method and Records Location</b>				
<b>Compliance Status Assessment Method</b>			<b>Location of Records/Documentation</b>	
<b>Citation</b>	<b>Text Description</b>			
NSR 5144A	Incinerator vapor capture systems configuration records		Pawnee Treating Plant office	
<b>3. Non-compliance Situation Description</b>				
A bypass exists to route incinerator feed vapors to the flare upon incinerator failure.				
<b>4. Corrective Action Plan Description</b>				
NSR 5144A renewal and amendment application that was submitted to TCEQ on 12/12/2013 requested a change to the special conditions to allow this bypass since it is only used during an emissions event situation of incinerator failure.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
<b>1</b>	The bypass will only be used in emergency situations before and after NSR 5144A is renewed and amended.			
<b>6. Previously Submitted Compliance Plan(s)</b>			<b>Type of Action</b>	<b>Date Submitted</b>
			N/A	
<b>7. Progress Report Submission Schedule</b>			Every 6 months after issuance of FOP O3136	

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
<b>Unit/Group/ Process ID. No(s).</b>	<b>SOP Index No.</b>	<b>Pollutant</b>	<b>Applicable Requirement</b>	
			<b>Citation</b>	<b>Text Description</b>
Sitewide	NSR 5144A		NSR 5144A	Emission sources and associated emissions should be properly characterized and authorized
<b>2. Compliance Status Assessment Method and Records Location</b>				
<b>Compliance Status Assessment Method</b>			<b>Location of Records/Documentation</b>	
<b>Citation</b>	<b>Text Description</b>			
NSR 5144A	Records of operating emission sources		Pawnee Treating Plant office	
<b>3. Non-compliance Situation Description</b>				
There are several unauthorized but operating emission sourced and some existing permitted sources were previously characterized incorrectly.				
<b>4. Corrective Action Plan Description</b>				
The NSR 5144A renewal and amendment application that was submitted to TCEQ on 12/12/2013 incorporated several unauthorized operating emission sources and will correct previous mischaracterizations associated with various existing permitted sources.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
<b>1</b>	The renewed and amended NSR 5144A will authorize several previously unauthorized operating emission sources and will correct previous mischaracterizations associated with various existing permitted sources.			
<b>6. Previously Submitted Compliance Plan(s)</b>			<b>Type of Action</b>	<b>Date Submitted</b>
			N/A	
<b>7. Progress Report Submission Schedule</b>			Every 6 months after issuance of FOP O3136	

**Appendix A**

**Acronym List ..... 33**

## Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	.....	actual cubic feet per minute
AMOC	.....	alternate means of control
ARP	.....	Acid Rain Program
ASTM	.....	American Society of Testing and Materials
B/PA	.....	Beaumont/Port Arthur (nonattainment area)
CAM	.....	Compliance Assurance Monitoring
CD	.....	control device
COMS	.....	continuous opacity monitoring system
CVS	.....	closed-vent system
D/FW	.....	Dallas/Fort Worth (nonattainment area)
DR	.....	Designated Representative
ELP	.....	El Paso (nonattainment area)
EP	.....	emission point
EPA	.....	U.S. Environmental Protection Agency
EU	.....	emission unit
FCAA Amendments	.....	Federal Clean Air Act Amendments
FOP	.....	federal operating permit
GF	.....	grandfathered
gr/100 scf	.....	grains per 100 standard cubic feet
HAP	.....	hazardous air pollutant
H/G/B	.....	Houston/Galveston/Brazoria (nonattainment area)
H <sub>2</sub> S	.....	hydrogen sulfide
ID No.	.....	identification number
lb/hr	.....	pound(s) per hour
MMBtu/hr	.....	Million British thermal units per hour
MRRT	.....	monitoring, recordkeeping, reporting, and testing
NA	.....	nonattainment
N/A	.....	not applicable
NADB	.....	National Allowance Data Base
NO <sub>x</sub>	.....	nitrogen oxides
NSPS	.....	New Source Performance Standard (40 CFR Part 60)
NSR	.....	New Source Review
ORIS	.....	Office of Regulatory Information Systems
Pb	.....	lead
PBR	.....	Permit By Rule
PM	.....	particulate matter
ppmv	.....	parts per million by volume
PSD	.....	prevention of significant deterioration
RO	.....	Responsible Official
SO <sub>2</sub>	.....	sulfur dioxide
TCEQ	.....	Texas Commission on Environmental Quality
TSP	.....	total suspended particulate
TVP	.....	true vapor pressure
U.S.C.	.....	United States Code
VOC	.....	volatile organic compound