

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
ET Gathering & Processing LLC

AUTHORIZING THE OPERATION OF
Tippett Gas Plant
Natural Gas Liquid Extraction

LOCATED AT
Crockett County, Texas
Latitude 31° 2' 16" Longitude 102° 13' 18"
Regulated Entity Number: RN100217843

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: O3190 Issuance Date: August 6, 2025



For the Commission

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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, Subpart HH or ZZZZ as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113,

Subchapter C, §§ 113.390 or 113.1090, respectively, which incorporate the 40 CFR Part 63 Subparts by reference.

- F. For the purpose of generating discrete emission reduction credits through 30 TAC Chapter 101, Subchapter H, Division 4 (Discrete Emission Credit Banking and Trading), the permit holder shall comply with the following requirements:
 - (i) Title 30 TAC § 101.372 (relating to General Provisions)
 - (ii) Title 30 TAC § 101.373 (relating to Discrete Emission Reduction Credit Generation and Certification)
 - (iii) Title 30 TAC § 101.374 (relating to Mobile Discrete Emission Reduction Credit Generation and Certification)
 - (iv) Title 30 TAC § 101.378 (relating to Discrete Emission Credit Banking and Trading)
 - (v) The terms and conditions by which the emission limits are established to generate the discrete reduction credit are applicable requirements of this permit
- 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 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_x, 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_x, 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 visible emissions from all other sources not specified in 30 TAC § 111.111(a)(1), (4), or (7); the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(8)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(8)(B)(i) or (ii)
- (iii) For a source subject to 30 TAC § 111.111(a)(8)(A), complying with 30 TAC § 111.111(a)(8)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, 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 source which is required to comply with 30 TAC § 111.111(a)(8)(A) shall be conducted at least once during each calendar quarter unless the source is not operating for the entire quarter.
- (2) Records of all observations shall be maintained.
- (3) Visible emissions observations of sources 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 sources operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each source in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each source 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)(8) and (a)(8)(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)(8)(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.

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 § 111.213 (relating to Exception for Hydrocarbon Burning)
 - (iv) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (v) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)
- 4. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
 - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
 - B. Title 40 CFR § 60.8 (relating to Performance Tests)
 - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
 - D. Title 40 CFR § 60.12 (relating to Circumvention)
 - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
 - F. Title 40 CFR § 60.14 (relating to Modification)
 - G. Title 40 CFR § 60.15 (relating to Reconstruction)
 - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 5. 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.
- 6. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
 - A. Title 40 CFR § 63.760(c) (relating to Applicability and Designation of Affected Source)
- 7. 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

8. 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 including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated March 21, 2025 in the application for project 36913, 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
9. 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.
10. 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, safety data sheets (SDS), 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).
11. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
 - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
 - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
 - C. Applicable requirements of 30 TAC § 116.620 for Installation and/or Modification of Oil and Gas Facilities based on the information contained in the registration application.

Compliance Requirements

12. 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.

13. 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

14. 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.

Alternative Requirements

15. The permit holder shall comply with the approved alternative means of control (AMOC); alternative monitoring, recordkeeping, or reporting requirements; or requirements determined to be equivalent to an otherwise applicable requirement contained in the Alternative Requirements attachment of this permit. Units complying with an approved alternative requirement have

reference to the approval in the Applicable Requirements summary listing for the unit. The permit holder shall maintain the original documentation, from the TCEQ Executive Director, demonstrating the method or limitation utilized. Documentation shall be maintained and made available in accordance with 30 TAC § 122.144.

Permit Location

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

Attachments

Applicable Requirements Summary

New Source Review Authorization References

Alternative Requirement

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

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
D-REGEN	GLYCOL DEHYDRATION	N/A	63HH	40 CFR Part 63, Subpart HH	No changing attributes.
E-10	SRIC ENGINES	N/A	63ZZZZ-01	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
E-12	SRIC ENGINES	N/A	63ZZZZ-02	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
F-2	FUGITIVE EMISSION UNITS	N/A	60OOOb-001	40 CFR Part 60, Subpart OOOb	No changing attributes.
FL-1	FLARES	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
GRP-ENG1	SRIC ENGINES	E-2, E-3, E-4, E-5, E-9	63ZZZZ-03	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRP-ENG2	SRIC ENGINES	E-6, E-7, E-8	63ZZZZ-04	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)
D-REGEN	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.764(e)(1)(ii) § 63.764(a) § 63.764(e)(1) § 63.764(j) § 63.775(c)(8)	The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.	[G]§ 63.772(b)(2)	§ 63.774(d)(1) § 63.774(d)(1)(ii)	None
E-10	EU	63ZZZZ-01	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.8 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 63.6625(h) § 63.6625(j)	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)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6603(f) § 63.6625(j) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)
E-12	EU	63ZZZZ-02	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.8 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 63.6625(h) § 63.6625(j)	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)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6603(f) § 63.6625(j) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)
F-2	EU	600000b-001	§111 Pollutant	40 CFR Part 60, Subpart 0000b	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60,	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 0000b

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)
					requirements of 40 CFR Part 60, Subpart OOOOb		Subpart OOOOb		
FL-1	CD	R1111	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. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
GRP-ENG1	EU	63ZZZZ-03	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.11 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 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 in Table 2d.11.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6603(f) § 63.6625(j) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)
GRP-ENG2	EU	63ZZZZ-04	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.10 § 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 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)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6625(j) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)

New Source Review Authorization References

New Source Review Authorization References 17

New Source Review Authorization References by Emission Unit 18

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.

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.	
Authorization No.: 73614	Issuance Date: 07/31/2025
Authorization No.: 107048	Issuance Date: 01/28/2022
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 6	Version No./Date: 06/07/1996
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.359	Version No./Date: 09/10/2013

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**
D-REGEN	GLYCOL REGENERATOR	107048
E-10	1ST INLET - CATERPILLAR G3516	107048
E-12	RESIDUE - WAUKESHA VHP	107048
E-2	COMPRESSOR ENGINE 3119	73614
E-3	COMPRESSOR ENGINE 3120	73614
E-4	COMPRESSOR ENGINE 3117	73614
E-5	COMPRESSOR ENGINE 3118	73614
E-6	COMPRESSOR ENGINE 3123	73614
E-7	COMPRESSOR ENGINE 3121	6/06/07/1996
E-8	COMPRESSOR ENGINE 3122	73614
E-9	COMPRESSOR ENGINE 3163	107048
F-2	COMPRESSOR FUGITIVES	107048
FL-1	FLARE	107048

**This column may include Permit by Rule (PBR) numbers and version dates, PBR Registration numbers in brackets, Standard Permit Registration numbers, Minor NSR permit numbers, and Major NSR permit numbers.

Alternative Requirement

Alternative Requirement..... 20

Brooke T. Paup, *Chairwoman*
Bobby Janecka, *Commissioner*
Catarina R. Gonzales, *Commissioner*
Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2025

MR TOBY CLARK
VICE PRESIDENT OPERATIONS
ET GATHERING & PROCESSING LLC
600 N MARIENFIELD ST, SUITE 700
MIDLAND TX 79701-

Re: Alternative Method of Compliance (AMOC) No. 218
Standard Permit Equivalency Review
Alternative Optical Gas Imaging Leak Detection and Repair
Customer Reference Number: CN606187110
Associated Permit Numbers: see below

Dear Mr. Clark:

This correspondence is in response to ET Gathering & Processing LLC's (ET's) December 12, 2022 request to follow an alternative method of compliance (AMOC) for fugitive leak detection and repair (LDAR) work practices using optical gas imaging (OGI) at several oil and gas sites currently authorized by the § 116.620 Oil and Gas Production Standard Permits (§116.620) or the Non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities Effective November 8, 2012 (NRSP).

We understand ET has requested the ability for designated sites to follow the OGI LDAR requirements of 40 CR 60 Subpart 0000b Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after December 6, 2022 (NSPS 0000b) and Appendix K Determination of Volatile Organic Compound and Greenhouse Gas Leaks Using Optical Gas Imaging (Appendix K) instead of the specific conditions for fugitive LDAR monitoring using traditional Method 21 and LDAR work practices as required in §116.620 or the NRSP. In some cases, facilities are subject to NSPS 0000b, at other sites following this alternative would be voluntary.

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a final decision to approve your AMOC request using the authority under §116.615(7) *Equivalency* review process. The sites listed below are covered by this AMOC and may follow the attached Conditions for the use of OGI LDAR for compliance. You are reminded that approval of any AMOC shall not abrogate the Executive Director or Administrator's authority or in any way prohibit later canceling the AMOC. By copy of this letter, we are informing the Environmental Protection Agency, Region 6.

This AMOC approval may supersede certain requirements or representations in the referenced Standard Permit registrations. To ensure effective and consistent enforceability, we request that ET incorporate this AMOC into the registrations through a hard-copy submittal of a Revision. This revision should be sent directly to the Air Permits Division and any appropriate TCEQ Regional office or local air pollution control program no later than 90 days after this approval, if being used at a site. That notification shall include all supporting, site-specific documentation.

This approval may also change applicable requirements for the site, which are identified in the site operating permits (SOPs) listed. The TCEQ recommends the submittal of an SOP administrative revision if any changes are necessary. Changes meeting the criteria for an administrative revision can be operated before issuance of the revision if a complete application is submitted to the TCEQ and this information is maintained with the SOP records at the site.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

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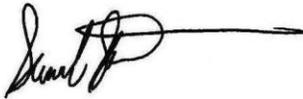
September 5, 2025
Page 2
MR TOBY CLARK

Re: AMOC 218

Site Name	Regulated Entity No.	City, County (TCEQ Region)	Standard Permit No.	SOP No.
Tippett Gas Plant	RN100217843	McCamey, Crockett TCEQ Region 8	§116.620 #107048	O3190
Panther Gas Plant	RN109124057	Rankin, Upton TCEQ Region 7	§116.620 # 139259	O4448
Rebel Gas Plant	RN106934664	Garden City, Glasscock TCEQ Region 7	§116.620 # 114311	O4459
Halley Gas Plant	RN100218916	Kermit, Winkler TCEQ Region 7	NRSP #109262	O3254
Mi Vida Treatment Plant	RN100215532	Barstow, Ward TCEQ Region 7	§116.620 #113099	O3185
Bear Gas Processing Plant	RN111529814	Orla, Reeves TCEQ Region 7	§116.620 #169564	O4446
Grey Wolf Gas Plant	RN111436614	Wink, Winkler TCEQ Region 7	§116.620 #168018	O4447
Badger Gas Plant	RN112007323	Orla, Culberson TCEQ Region 6	§116.620 #176888	O4749

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



Samuel Short, Deputy Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

cc: Alena Miro, Environmental Manager, Energy Transfer
Stephanie Pina, Sr Engineer, WTX – Operations
Elizabeth McGurk, Montrose Environmental
Air Section Manager, Region 6 – El Paso
Air Section Manager, Region 7 - Midland
Air Section Manager, Region 8 - San Angelo
Michael Partee, Manager, Rule Registrations Section, Air Permits Division, OA: MC-163
Rhyan Stone, Manager, Operating Permits Section, Air Permits Division, OA: MC-163
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 351877

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**Alternative Method of Control (AMOC) Plan, AMOC Number: AMOC-218
ET Gathering and Processing, LLC (ET)
Customer Identification Number CN606187110
Alternative Fugitive Leak Detection and Repair (LDAR) Program**

- I. This AMOC Plan Authorization shall apply at the following ET Gathering and Processing, LLC (ET) sites:

Site Name	Responsible Official	Regulated Entity Number	City, County (TCEQ Region)	Standard Permit	Title V Permit
Tippett Gas Plant	Chris Thompson	RN100217843	McCamey, Crockett (Region 8)	§116.620 SP # 107048	O3190
Panther Gas Plant	Andrew Mann	RN109124057	Rankin, Upton (Region 7)	§116.620 SP # 139259	O4448
Rebel Gas Plant	Andrew Mann	RN106934664	Garden City, Glasscock (Region 7)	§116.620 SP # 114311	O4459
Halley Gas Plant	Chris Thompson	RN100218916	Kermit, Winkler (Region 7)	NRSP SP #109262	O3099
Mi Vida Treatment Plant	Chris Thompson	RN100215532	Barstow, Ward (Region 7)	§116.620 #113099	O3185
Bear Gas Processing Plant	Chris Thompson	RN111529814	Orla, Reeves (Region 7)	§116.620 #169564	O4446
Grey Wolf Gas Plant	Chris Thompson	RN111436614	Wink, Winkler (Region 7)	§116.620 #168018	O4447
Badger Gas Plant	Chris Thompson	RN112007323	Orla, Culberson (Region 6)	§116.620 #176888	O4749

- II. A copy of the AMOC application and the AMOC Plan provisions must be kept on-site or at a centralized location and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any pollution control agency with jurisdiction. This AMOC authorization is defined by the application received December 12, 2022, and supporting documentation submitted through August 20, 2025.
- III. This authorization is granted under § 116.617 for emissions sources regulated by 30 Texas Administrative Code (TAC) Chapter 116, Subchapter F, Standard Permits:
- §116.620 Installation and/or Modification of Oil and Gas Facilities (§ 116.620), and/or
 - Non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities (NRSP).

This AMOC shall apply in lieu of the requirements in these state authorization conditions, as applicable. Compliance with this AMOC is independent of the regulated entity's obligation to comply with all other applicable requirements of 30 TAC Chapters, TCEQ permits, and applicable state and federal laws. Compliance with the requirements of this plan does not assure compliance with requirements of an applicable New Source Performance Standard (NSPS), National Emission Standard for Hazardous Air Pollutants (NESHAPs), or an Alternative Means of Emission Limitation (AMEL) and does not constitute approval of alternative standards for these regulations.

- IV. In accordance with 30 TAC § 116.615(2), all representations submitted for these standard permit authorized facilities and this AMOC, as well as the provisions listed here, become conditions upon which this AMOC Plan is issued. It is unlawful to vary from the emission limits, control requirements, monitoring, testing, reporting or recordkeeping requirements of this Plan.

- V. For sites authorized by §116.620, the requirements in Condition No. 6 apply to fugitive emissions components for leak detection and repair (LDAR) and supersedes the requirements in 30 TAC § 116.620(c) and (d)(1).

For sites authorized by the NRSP, the requirements in Condition No. 6 apply to fugitive emissions components for LDAR and supersedes the requirements in Standard Permit (d)(1)(A), (e)(6), and relevant fugitive LDAR portions of Tables 7, 8, and 9.

- VI. The following requirements may be applied to fugitive emissions components affected facilities to reduce fugitive emissions of methane and volatile organic compounds (VOC) on a voluntary basis, and has been determined to be equivalent to the LDAR referenced paragraph V. If the company opts to revert to the previous LDAR Program referenced above, the TCEQ Region Office must be notified and associated records and reports updated.

This condition must be met for each fugitive component as listed and represented in the AMOC revised application dated March 10, 2025, through August 20, 2025. Compliance must be achieved as soon as practicable but no later than 90 days from the issuance date of this AMOC or start-up of associated facilities.

A. General Requirements and Applicability.

1. The following are applicable to this condition:

- i. All process unit equipment fugitive components at an onshore natural gas processing plant including each pump, pressure relief device, open-ended valve or line, valve, and flange or other connector that has the potential to emit methane or VOC and any device or system required by this condition.
- ii. "No detectable emissions" or a "leak" is defined by ≥ 500 ppmv using a FID-based or catalytic combustion-based instrument for valves and connectors and $\geq 2,000$ ppmv for pumps following the requirements in 40 CFR 60, Appendix A-7, Method 21 (Method 21). The instrument shall be calibrated before use each day of use by the procedures specified and using zero air and a mixture of methane or n-hexane and air at a concentration no more than 2,000 ppmv.
- iii. Alternatively, a "leak" is defined as any emissions observed using an optical gas imaging (OGI) camera. Any OGI monitoring must follow 40 CFR 60, Appendix K "Determination of Volatile Organic Compound and Greenhouse Gas Leaks Using Optical Gas Imaging".
- iv. Equipment is in light liquid service when all the following conditions apply based on representative samples of the process fluid that is contained in or contacts the equipment, or gas being combusted in a flare. Standard reference texts or ASTM D2879-83, -96, or -97 shall be used to determine vapor pressures.
 - a. The vapor pressure of one or more of the organic components is greater than 0.3 kPa at 20 °C (1.2 in H₂O at 68 °F);
 - b. The total concentration of the pure organic components having a vapor pressure greater than 0.3 kPa at 20 °C (1.2 in H₂O at 68 °F) is equal to or greater than 20 percent by weight;
 - c. The fluid is a liquid at operating conditions; or
 - d. If the weight percent evaporated is greater than 10 percent at 150 degrees Celsius (302 degrees Fahrenheit) as determined by ASTM D86-96.
- v. Each piece of equipment or component is presumed to have the potential to emit methane or VOC unless an owner or operator demonstrates otherwise. For a piece of equipment to be considered not to have the potential to emit methane or VOC, the methane and VOC content of a gaseous stream must be below detection limits using Method 18 of 40 CFR 60 Appendix A-6. Alternatively, if the piece of equipment is in wet gas service, methane and VOC content of the stream may be determined by being below the detection limit of the methods described in ASTM E168-16(R2023), E169-16(R2022), or E260-96.

2. The following are exempt from this condition:

- i. Pumps in light liquid service, pressure relief devices in gas/vapor service, valves in gas/vapor and light liquid service, and connectors in gas/vapor service and in light liquid service that are located at a non-fractionating plant with a design capacity less than 10 million standard cubic feet per day (10 MMscfd) of field gas are exempt from:
 - a. Bi-monthly OGI monitoring requirements as required under paragraph (B)(1)(i) of this condition; or

- b. Routine Method 21 monitoring requirements as required under paragraph (B)(2) of this condition.
 - ii. Equipment that is in vacuum service, except connectors in gas/vapor and light liquid service, is excluded from the requirements of this condition if identified in all initial and subsequent reports.
 - iii. Equipment designated as having the potential to emit methane or VOC less than 300 hr/yr is excluded from the requirements of this condition if it meets any of the conditions specified below:
 - a. The equipment has the potential to emit methane or VOC only during startup and shutdown.
 - b. The equipment is backup equipment that has the potential to emit methane or VOC only when the primary equipment is out of service.
- 3. The following process unit equipment fugitive components at a natural gas processing plant must comply with this condition:
 - i. Pressure relief devices (PRDs) in gas/vapor service;
 - ii. Valves in gas/vapor service or light liquid service;
 - iii. Connectors in gas/vapor service or light liquid service;
 - iv. Pumps in light liquid service;
 - v. PRDs in light liquid service;
 - vi. Pumps, valves, connectors, and PRDs in heavy liquid service.
 - vii. Open-ended valves or lines; and
 - viii. Closed vent systems and control devices used to comply with any equipment leak provisions
- 4. New and Reworked Equipment. The following requirements apply to all equipment, as applicable:
 - i. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.
 - ii. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.
 - iii. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation.
 - iv. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer method within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance.
- 5. UTM, DTM, and Open-Ended Valves or Lines
 - i. Components that are considered inaccessible (e.g., insulated components), difficult-to-monitor (DTM), or unsafe-to-monitor (UTM) when using a Method 21 instrument shall be monitored with the OGI as long as such components are not considered DTM or UTM when using an OGI. All such components shall be included in company records and reporting.
 - ii. A DTM valve or line is a component that cannot be inspected without elevating the monitoring personnel more than two meters above a permanent support surface or that requires a permit for confined space entry as defined in 29 CFR §1910.146 or 30 TAC §115.352(7). For natural gas processing plants, less than 3.0 % of the total number of fugitive components may be designated as DTM.
 - iii. An UTM component is designated if monitoring personnel would be exposed to an immediate danger as a consequence of conducting the monitoring. Any fugitive component that is designated as UTM is exempt from routine monitoring if the monitoring plan requires monitoring as frequently as practicable during safe-to-monitor times (but not more frequently than the periodic monitoring schedule otherwise applicable).

- iv. All DTM or UTM components shall be evaluated for accessibility to complete repairs. Records of these evaluations shall be developed and maintained by the facility. If a leak is detected, the equipment must be repaired according to the procedures in paragraph (C) of this condition.
- v. Each open-ended valve or line must be designed, operated, and comply with the following:
 - a. Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve, except as provided in subparagraphs (e) and (f). The cap, blind flange, plug, or second valve must seal the open end of the valve or line at all times except during operations requiring process fluid flow through the open-ended valve or line.
 - b. If evidence of a leak is found at any time by AVO, or any other detection method, a leak is detected.
 - c. Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
 - d. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall remain closed at all other times.
 - e. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of this condition.
 - f. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block-and-bleed system are exempt from the requirements of this condition.

B. Operational And Emissions Limits.

- 1. **Conduct OGI Surveys:** Comply with the following. If any leaks are detected, repairs and re-monitoring must follow paragraph C of this condition.
 - i. Conduct bimonthly monitoring surveys of all equipment fugitive components using OGI. Each fugitive component shall be observed or monitored during each monitoring survey.
 - ii. All pumps in light liquid service must be monitored per the following:
 - a. Conduct weekly visual inspections for indications of liquids dripping from the pump seal.
 - b. If there are indications of liquids dripping from the pump seal, either repair the leak or monitor the pump within 5 calendar days using OGI or Method 21. Any pump seal leak observed by OGI or measured by Method 21 \geq 2000 ppmv must be repaired following paragraph C. Any pump equipped with a CVS is exempt from visual inspection requirements.
 - iii. PRDs in gas/vapor service must be monitored within 5 calendar days after each pressure release to detect leaks using OGI or Method 21 unless the exceptions below are met. Any leak observed using OGI or \geq 500 ppmv by Method 21 must be repaired.
 - a. Any pressure relief device that is located in a non-fractionating plant that is monitored only by non-plant personnel may be monitored after a pressure release the next time the monitoring personnel are onsite or within 30 calendar days after a pressure release, whichever is sooner, instead of within 5 calendar days as specified. No pressure relief device described in this paragraph may be allowed to operate for more than 30 calendar days after a pressure release without monitoring.
 - b. Any pressure relief device that is routed to a CVS is exempt from these requirements.
 - iv. For PRDs in light liquid service and pumps, valves, connectors, and PRDs in heavy liquid service, if evidence of a potential leak is found at any time by AVO or any other detection method, the equipment must be repaired.
 - v. Any fugitive component routed to a closed vent system (CVS) and vented to a control, process, or fuel gas system must comply be designed and operated with no identifiable fugitive emissions and meet the following:
 - a. For each joint, seam, or other connection that is permanently or semi-permanently sealed (e.g., a welded joint between two sections of hard piping or a bolted and gasketed ducting flange), conduct an initial inspection to demonstrate no identifiable emissions within the first 30 days after startup of the system.

- b. Conduct annual AVO inspections for defects that can result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in ductwork; loose connections; liquid leaks; or broken or missing caps or other closure devices.
 - c. Following any time a component or connection is unsealed for repair or replacement. Monitor a component or connection using the test methods and procedures in this condition to demonstrate that it operates with no identifiable emissions.
 - d. Any CVS, process, or control device bypass device must meet the following:
 - i.* Set the flow indicator to take a reading at least once every 15 minutes at the inlet to the bypass device that could divert the stream away from the control device and to the atmosphere.
 - ii.* If the bypass device valve installed at the inlet to the bypass device is secured in the non-diverting position using a car-seal or a lock-and-key type configuration, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass device.
2. Alternative Method 21 Surveys. An owner or operator may choose to comply with all of the following requirements instead of the requirements in paragraph (B)(1) above. If any leaks are detected, repairs and re-monitoring must follow paragraph C of this condition.
- i. Each pump in light liquid service must be monitored per the following, except as provided in subparagraphs (c)-(f) below.
 - a. Each pump must be monitored monthly by Method 21 to detect leaks. A leak is defined as an instrument reading of 2,000 ppmv or greater.
 - b. Conduct weekly visual inspections for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, either repair the leak or monitor the pump within 5 calendar days using OGI or Method 21. Any pump seal leak observed by OGI or measured by Method 21 \geq 2,000 ppmv must be repaired.
 - c. Any pump is equipped with a CVS that complies is exempt from monitoring and visual inspection requirements.
 - d. Any pump that is designated as UTM that meets this condition is exempt.
 - e. Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt, provided all the following requirements are met:
 - i.* Each dual mechanical seal system is operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a CVS to a control device; or equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.
 - ii.* The barrier fluid system is in heavy liquid service or does not have the potential to emit methane or VOC.
 - iii.* Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.
 - iv.* Each pump is checked according to the requirements in subparagraphs (a)-(b) above.
 - v.* Each sensor where each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both, is checked daily or is equipped with an audible alarm. Based on design considerations and operating experience, criterion that indicates failure of the seal system, the barrier fluid system, or both is established. If the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.
 - f. Any pump that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background, is exempt from the requirements in subparagraphs (a)-(b) if the pump:
 - i.* Has no externally actuated shaft penetrating the pump housing; and

- vi. All connectors in gas/vapor service and in light liquid service in the process unit shall be monitored within 12 months of the start-up of the process unit (initially) and annually using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater.
 - a. Any connector that is designated as an UTM connector is exempt.
 - b. DTM (inaccessible), ceramic, or ceramic-lined connectors are exempt from this condition. If any inaccessible, ceramic, or ceramic-lined connector is observed by AVO or other means to be leaking, the indications of a leak to the atmosphere by AVO or other means must be eliminated as soon as practicable. Inaccessible connectors meet any of the following:
 - I. Buried.
 - II. Insulated in a manner that prevents access to the connector by a monitor probe.
 - III. Obstructed by equipment or piping that prevents access to the connector by a monitor probe.
 - IV. Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold that would allow access to connectors up to 7.6 meters (25 feet) above the ground.
 - V. Inaccessible because it would require elevating monitoring personnel more than 2 meters (7 feet) above a permanent support surface or would require the erection of scaffold.
 - VI. Not able to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines or would risk damage to equipment.
 - c. Connectors which are part of an instrumentation systems, and inaccessible, ceramic, or ceramic-lined connectors are not subject to the recordkeeping requirements of this condition.

C. **Repairs and Re-monitoring.** When a leak is detected, comply with the following repair and re-monitoring requirements:

- 1. A weatherproof and readily visible identification tag, marked with the equipment identification number, must be attached to the leaking equipment. The identification tag on equipment may be removed after it has been repaired.
- 2. A first attempt at repair must be made as soon as practicable, but no later than 5 calendar days after the leak is detected.

A first attempt at repair is not required if the leak is detected using OGI and the equipment identified as leaking would require elevating the repair personnel more than 2 meters above a support surface.

- i. First attempts at repair for pumps in light liquid or heavy liquid service include, but are not limited to, tightening the packing gland nuts and ensuring that the seal flush is operating at design pressure and temperature, where practicable.
- ii. Beginning January 22, 2027, or 180 days from start up, whichever is later, for each valve where a leak is detected, you must comply with the following:
 - a. Repack the existing valve with a low-e packing (valve packing product for which the manufacturer has issued a written warranty or performance guarantee that it will not emit fugitives at greater than 100 ppm in the first five years. Low-e injectable packing is a type of low-e packing product for which the manufacturer has also issued a written warranty or performance guarantee and that can be injected into a valve during a "drill-and-tap" repair of the valve);
 - b. Replace the existing valve with a low-e valve (valves, including its specific packing assembly, for which the manufacturer has issued a written warranty or performance guarantee that it will not emit fugitives at greater than 100 ppm in the first five years. A valve may qualify as a low-e valve if it is as an extension of another valve that has qualified as a low-e valve); or
 - c. Perform a drill and tap repair with a low-e injectable packing.
 - d. An owner or operator is not required to utilize a low-e valve or low-e packing to replace or repack a valve if the owner or operator demonstrates that a low-e valve or low-e packing is not technically feasible. Low-e valve or low-e packing that is not suitable for its intended use is considered to be technically infeasible. Factors that may be considered in determining technical

infeasibility include: retrofit requirements for installation (e.g., re-piping or space limitation), commercial unavailability for valve type, or certain instrumentation assemblies.

3. Repair of leaking equipment must be completed within 15 calendar days after detection of each leak, except as provided in subparagraphs (4)-(6).
4. If the repair for visual indications of liquids dripping for pumps in light liquid service can be made by eliminating visual indications of liquids dripping, you must make the repair within 5 calendar days of detection.
5. If the repair for AVO or other indication of a leak for open-ended valves or lines; pumps, valves, or connectors in heavy liquid service; or pressure relief devices in light liquid or heavy liquid service can be made by eliminating the AVO, or other indication of a potential leak, you must make the repair within 5 calendar days of detection.
6. Delay of repair of equipment for which leaks have been detected is allowed if repair within 15 days is technically infeasible without a process unit shutdown or as specified in (i) – (v) below. Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.
 - i. Delay of repair of equipment is allowed for equipment which is isolated from the process, and which does not have the potential to emit methane or VOC.
 - ii. Delay of repair for valves and connectors is allowed if the following conditions are met.
 - a. Demonstrate that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
 - b. When repair procedures are conducted, the purged material is collected and destroyed or recovered in a control device meeting these conditions.
 - iii. Delay of repair for pumps is allowed if the following conditions are met.
 - a. Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
 - b. Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
 - iv. If delay of repair is required to repack or replace the valve. Delay of repair beyond a process unit shutdown is allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
 - v. When delay of repair is allowed for a leaking pump, valve, or connector that remains in service, the pump, valve, or connector may be considered to be repaired and no longer subject to delay of repair requirements if two consecutive bimonthly monitoring results show no leak remains.

D. Initial Compliance

1. Submit initial notifications as required by the following:
 - i. A notification of the date construction or reconstruction of an affected facility is commenced postmarked no later than 30 days after such date.
 - ii. If a new or reconstructed facility, a notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
 - iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which this permit applies. This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. TCEQ may request additional relevant information subsequent to this notice.
 - iv. If an existing plant proposes to replace components, and the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new plant's components, the owner or operator shall notify the TCEQ of the

proposed replacements. The notice must be postmarked 60 days (or as soon as practicable) before construction of the replacements is commenced, and must include the following information:

- a. Name and address of the owner or operator.
 - b. The location of the existing facility.
 - c. A brief description of the existing facility and the components which are to be replaced.
 - d. A description of the existing air pollution control equipment and the proposed air pollution control equipment.
 - e. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new facility.
 - f. The estimated life of the existing facility after the replacements.
 - g. A discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.
2. Within 90 days of the startup of production for each new / modified fugitive emissions component demonstrate and document the following, as applicable:
- i. Conduct initial monitoring for all fugitive component types.
 - ii. Conduct monitoring for each pump in light liquid service, pressure relief device in gas/vapor service, valve in gas/vapor or light liquid service, connector in gas/vapor or light liquid service as required and document.
 - iii. Comply with the equipment requirements for each open-ended valve or line as required and document.
 - iv. For each pump equipped with a dual mechanical seal system that degasses the barrier fluid reservoir to a process or a control device, each pump which captures and transports leakage from the seal or seals to a process or a control device, or each pressure relief device which captures and transports leakage through the pressure relief device to a process or a control device, document meeting the following requirements:
 - a. Reduce methane and VOC emissions by 95.0 percent or greater ($\geq 95.0\%$) and document performance demonstration or route to a process.
 - b. Install a CVS to capture all emissions from each pump equipped with a dual mechanical seal system that degasses the barrier fluid reservoir, each pump which captures and transports leakage from the seal or seals, or each pressure relief device which captures and transports leakage through the pressure relief device and route all emissions to a process or to a control device.
 - c. If routing to a control device, conduct an initial performance test or install a control device with TCEQ-approved manufacturer's testing.
 - d. Conduct the initial inspections of the CVS and system(s) bypasses, if applicable.
 - e. Install, calibrate, operate and maintain continuous monitoring and recording devices to measure appropriate control device operating parameters.
 - i. Continuous parameter monitoring systems used to detect the presence of a pilot or combustion flame must record a reading at least once every 5 minutes. Heat sensing monitoring devices that indicate the continuous ignition of a pilot or combustion flame are exempt from the calibration, quality assurance and quality control requirements of this condition. All non-pilot/flame continuous parameter monitoring systems must measure data values at least once every hour, record each measured value, and calculate the 1-hour block average values (or shorter periods) from all measured data values during each time period for each parameter.
 - ii. Prepare a monitoring plan that covers each control device which address the monitoring system design, data collection, quality assurance, and quality control elements (including, not limited to, sample interface type and location which provides representative measurements, detector signal analyzer, data acquisition, calculations, equipment performance checks, system accuracy audits or other audit procedures, ongoing operation and maintenance procedures, and all associated records). Install, calibrate, operate, and

maintain each continuous parameter monitoring system in accordance with the procedures in the monitoring plan.

- iii. Conduct the continuous parameter monitoring system equipment performance checks, system accuracy audits, or other audit procedures specified in the monitoring plan at least once every 12 months.
 - v. Tag and repair each identified leak as required in paragraph (C).
3. Submit any required site monitoring plans and an initial semiannual report for each fugitive emissions component no later than 90 days after the end of the initial compliance period specified in subparagraph (2) above. Submit all reports through CEDRI for 40 CFR 60, Subpart OOOOb. Include the following information:
- i. Company name, facility site name, and address of the affected facility. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report".
 - ii. Beginning and ending dates of the reporting period.
 - iii. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If the report is submitted via CEDRI, the certifier's electronic signature must be included.
 - iv. For each process unit: identification number/name; and number of valves, pumps, connectors, and PRDs subject to the monitoring required in this condition, indicating light or heavy service.
 - v. For each month during the semiannual reporting period for each process unit: the number of valves, pumps, connectors, PRDs, and open-ended valves or lines for which leaks were detected; the number of any component(s) for which leaks were not repaired as required by this condition; and the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.
 - vi. Dates of process unit shutdowns which occurred within the semiannual reporting period.
 - vii. For any CVS or control device, manufacturer's written operating instructions, procedures, operating envelopes, and any performance tests. Maintain detailed records of inspections, identified leaks, repairs, maintenance, pilots, gas flow rates, and parametric monitoring, as applicable.
- E. **Continuous Compliance.** At a minimum, demonstrate on-going compliance with the following for each fugitive component:
1. Conduct initial and periodic monitoring surveys as required by this condition.
 2. Tag and repair each identified source of fugitive emissions as required paragraph (C) of this condition.
 3. Submit semiannual and annual reports. All reports must contain the information required in subparagraphs (D)(1)-(3), as applicable. If changes have occurred since the previous report, include revisions to applicable items and subsequent compliance demonstrations. Include updates to any fugitive monitoring.
- F. **Records.** At a minimum, meet the following for compliance demonstrations:
1. All records must be maintained either onsite or at the nearest local field office for at least 5 years and made available upon request.
 2. Any records that are submitted electronically via EPA's CEDRI may be maintained in electronic format. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report". The ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to EPA, TCEQ, or any local air pollution control program with jurisdiction as part of an on-site compliance evaluation.
 3. Maintain a file of: all measurements and surveys, including OGI, Method 21, continuous monitoring systems, monitoring devices, and performance testing measurements; all survey and monitoring system performance evaluations; all device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by these conditions recorded in a permanent form suitable for inspection.

4. For any CVS or control device, manufacturer's written operating instructions, procedures, operating envelopes, and any performance tests. Maintain detailed records of inspections, identified leaks, repairs, maintenance, pilots, gas flow rates, and parametric monitoring, as applicable.
5. For any bypass, maintain a record of the following, as applicable: readings from the flow indicator; each inspection of the seal or closure mechanism; the date and time of each instance the key is checked out; date and time of each instance the alarm is sounded.
6. Equipment exempted or excluded from these conditions shall be identified in a list or by one of the methods described below to be made readily available upon request and may be identified by one or more of the following methods:
 - i. piping and instrumentation diagram (PID);
 - ii. a written or electronic database or electronic file;
 - iii. color coding;
 - iv. a form of weatherproof identification; or
 - v. designation of exempted process unit boundaries.

Appendix A

Acronym List 34

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
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (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
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	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
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
RO	Responsible Official
SIP	state implementation plan
SO ₂	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