Princess Ohiagu

From: Jarrett Keck <jkeck@expl.com>

Sent: Tuesday, September 2, 2025 12:16 PM

To: Princess Ohiagu

Subject: RE: [EXTERNAL] Fauna OP-CRO1 Form

Attachments: ExplOPSCRO1090225.pdf

Ms Ohiagu, the original wet-signature hard copy has been overnighted to your office. Please see attached.

Jarrett Keck, P.E., CHMM Environmental Engineer Explorer Pipeline Company

Email: jkeck@expl.com Desk: (918)-493-5191 Mobile: (918)-809-4386

From: LaVern Choquette < vchoquette@bearcreekconsultants.com >

Sent: Friday, August 29, 2025 10:23 AM

To: Jarrett Keck < jkeck@expl.com>; Lauren Sanders < lsanders@expl.com>

Subject: [EXTERNAL] Fauna OP-CRO1 Form

Good Morning:

Ms. Ohiagu with the TCEQ is requesting a final OP-CRO1 to certify all updates to the application. The Form is attached.

Princess

Ohiagu
Vern Choquette
Principal Consultant
Bear Creek Consultants
405-615-3757

...Think about things that are excellent and worthy of praise. -Phil 4:8



Jarrett Keck, P.E., CHMM **Environmental Engineer**

P. O. Box 2650 Tulsa, Oklahoma 74101 918-493-5191 - Office 918-809-4386 - Cell jkeck@expl.com

September 2, 2025

Ms. Princess Ohiagu TCEQ - Air Permits Division 12100 Park Thirty-Five CIR Building C, Mail Code 161 AUSTIN, TX US 78753

Re:

Explorer Pipeline -Fauna Pipeline Breakout Station RN 100225432, CN 600424584 OP-CRO1 Certification by Responsible Official

Dear Ms. Ohiagu,

Please find attached, original signature OP-CROP Certification by Responsible official

Should you have additional questions, please contact me a:t 918-493-5191

Respectfully

Jarrett Keck PE, CHMM **Environmental Engineer**

Attachments: OP-CRO1

Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

| I. | Identifying Informat | ion | | | | | |
|--------|---|-------------------------------|--|----------------|------------------|-------------------|-----------------|
| RN: | 100225432 | | CN:600424584 | | Acc | ount No.: HG-088 | 9-D |
| Perm | nit No.: FOP O4493 | | , | Project No. | : 35621 | | |
| Area | Name:Fauna Pipeline | Breakout St | ation | Company N | Vame: Explorer F | Pipeline Company | |
| II. | Certification Type (| Please mark | the appropriate | box) | | | |
| ⊠ R | esponsible Official | | | ☐ Duly A | Authorized Repre | esentative | |
| III. | Submittal Type (Ple | ase mark the | e appropriate bo | x) (Only one | response can be | accepted per form | n) |
| ⊠ s | OP/TOP Initial Permit | Application | ☐ Upda | te to Permit A | Application | | |
| □ G | OP Initial Permit Appl | ication | Perm | it Revision, R | Renewal, or Reop | ening | |
| □ 0 | Other: | | | | 5 | | |
| IV. | Certification of Trut | h | | | | | |
| only. | certification does not uren Sanders | t extend to i | nformation whic | | ited by the TCE | | l for reference |
| 1, | (Certifier Nar | ne printed or | r typed) | | my mat I am me | (RO or D | PAR) |
| the ti | hat, based on information me period or on the sport. Enter Either a Time | ecific date(s) Period OR S |) below, are true, Specific Date(s) f | accurate, an | d complete: | | |
| | fication is not valid wi | | entation date(s). | | | | |
| Time | Period: From09/29 | /2023 | | to 08/28 | | | · · |
| | | St | tart Date | | 1 | End Date | |
| Spec | ific Dates: | te 1 | Date 2 | Date 3 | Date 4 | Date 5 | Date 6 |
| | ture: //////////////////////////////////// | 1 Sta | enders | | Signature D | ate: 09/02 | 12025 |
| Title: | , , , | | | | | | |

Jarrett Keck

From: UPS <pkginfo@ups.com>

Sent: Tuesday, September 2, 2025 12:10 PM

To: Jarrett Keck

Subject: [EXTERNAL] UPS Ship Notification, Tracking Number 1Z78E33X0198767152



You have a package coming.

Estimated Delivery Date: Wednesday, 09/03/2025

Estimated Delivery Time: by 7:00 PM

This message was sent to you at the request of Explorer Pipeline to notify you that the shipment information below has been transmitted to UPS. The physical package may or may not have actually been tendered to UPS for shipment. To verify the actual transit status of your shipment, click on the tracking link below.

Shipment Details

From: EXPLORER PIPELINE

Tracking Number: <u>1Z78E33X0198767152</u>

Princess Ohiagu

TCEQ Air Permits Division
12100 Park Thirty-Five CIR
Buidling C, Mail Code 161

AUSTIN, TX 78753

US

UPS Service: UPS NEXT DAY AIR

Number of Packages: 1

Weight: 0.2 LBS

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For Questions, Visit Our Help and Support Center



Princess Ohiagu

From: Princess Ohiagu

Sent: Tuesday, July 15, 2025 4:14 PM **To:** Jarrett Keck; Don Whitney

Cc: LaVern Choquette

Subject: Update: Working Draft Permit - FOP O4493/Project 35621, Explorer Pipeline

Company/Fauna Pipeline Breakout Station

Good afternoon Mr. Keck,

After further review, we are requesting that the following items are submitted by July 23, 2025:

- Please resubmit the OP-REQ1 Page 1: Given that typically storage tanks will have vents on these tanks emitting in the air. The response to question I.A.2. should be "Yes".
- Please resubmit the OP-REQ1 Page 2: The application area includes nonagricultural processes. The response to question I.C.1 should be "Yes".
- Please resubmit the OP-REQ1 Page 17: There are units in the permit that have 40 CFR Part 60 subpart requirements. The response to question VI.A.1 should be "Yes".

Thank you,

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
512 239-2048
Princess.ohiagu@tceq.texas.gov



How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Jarrett Keck < <u>ikeck@expl.com</u>>
Sent: Thursday, June 26, 2025 3:09 PM

To: Princess Ohiagu < Princess. Ohiagu@tceq.texas.gov>; Don Whitney < dwhitney@bearcreekconsultants.com>

Cc: LaVern Choquette < vchoquette @bearcreekconsultants.com >

Subject: RE: Working Draft Permit - FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout

Station

Princess, we have reviewed the draft permit and have no comment.

Jarrett Keck, P.E., CHMM Environmental Engineer Explorer Pipeline Company

Email: jkeck@expl.com

Desk: (918)-493-5191 Mobile: (918)-809-4386

From: Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov>

Sent: Thursday, June 26, 2025 12:13 PM

To: Don Whitney < dwhitney@bearcreekconsultants.com>

Cc: LaVern Choquette < vchoquette@bearcreekconsultants.com>; Jarrett Keck < jkeck@expl.com>

Subject: [EXTERNAL] Working Draft Permit - FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline

Breakout Station

Good afternoon Mr. Whitney,

I'm following up on the working draft permit that was sent for review on May 30, 2025, and comments were due by June 13, 2025.

Thank you,

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
512 239-2048
Princess.ohiagu@tceq.texas.gov

| How are we doing? Fill out our online customer satisfaction survey |
|--|
| at <u>www.tceq.texas.gov/customersurvey</u> |

From: Jarrett Keck < <u>jkeck@expl.com</u>>
Sent: Monday, May 12, 2025 3:42 PM

To: Princess Ohiagu < Princess Ohiagu@tceq.texas.gov; Don Whitney < dwhitney@bearcreekconsultants.com

Cc: LaVern Choquette < vchoquette@bearcreekconsultants.com>

Subject: RE: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station

Mr. Princess, for future reference, please refer to Mr. Don Whitney correctly. You may refer to him as Mr. Whitney.

Regards,

Jarrett Keck, P.E., CHMM Environmental Engineer Explorer Pipeline Company

Email: jkeck@expl.com Desk: (918)-493-5191 Mobile: (918)-809-4386 From: Princess Ohiagu < Princess. Ohiagu@tceq.texas.gov>

Sent: Monday, May 12, 2025 3:39 PM

To: Don Whitney < dwhitney@bearcreekconsultants.com>

Cc: Jarrett Keck < jkeck@expl.com >; LaVern Choquette < vchoquette@bearcreekconsultants.com >

Subject: [EXTERNAL] RE: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline

Breakout Station

Hello Mr. Donald,

Please resubmit the attribute for **"Storage Capacity"** on OP-UA3 (Page 3) for Unit IDs T-2407, T-2408 and T-2490 subject to Subpart Kb.

For Unit IDs T-2407, T-2408 and T-2490, an incompatible code for Storage Capacity was chosen. You chose **420K-**, which is restricted to Product Stored codes you didn't choose.

Please choose a code from the top section, as indicated in the instructions for PTLQ-3.

Storage Capacity:

Select one of the following options for the nominal storage capacity of the storage vessel. Enter the code on the form.

For storage vessels with a "Product Stored" designation "PTLQ-3," "PTCD-AF3," "CRUD-AF3," "VOL," or "WASTE:"

| Code | Description |
|---------|--|
| 10K- | Capacity is less than 10,600 gallons (40,000 liters) |
| 10K-20K | Capacity is greater than or equal to 10,600 gallons but less than 19,813 gallons (capacity is greater than 40,000 liters but less than or equal to 75,000 liters) |
| 20K-40K | Capacity is greater than or equal to 19,813 gallons but less than 39,890 gallons (capacity is greater than 75,000 liters but less than or equal to 151,000 liters) |
| 40K+ | Capacity is greater than or equal to 39,890 gallons (151,000 liters) |

TCEQ - 10008 (APD-ID37v6, Revised 02/25) OP-UA3 This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 02/25)

Page 10 of 126

OP-UA3 Instructions

For storage vessels with a "Product Stored" designation "PTCD-BF3" or "CRUD-BF3:"

| Code | Description |
|-------|--|
| 420K- | Capacity is less than or equal to 420,000 gallons (1,589,874 liters) |
| 420K+ | Capacity is greater than 420,000 gallons (1,589,874 liters) |

From: Don Whitney <dwhitney@bearcreekconsultants.com>

Sent: Monday, May 12, 2025 9:38 AM

To: Princess Ohiagu < Princess. Ohiagu@tceq.texas.gov>

Cc: <u>jkeck@expl.com</u>; LaVern Choquette < <u>vchoquette@bearcreekconsultants.com</u>>

Subject: Re: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station

Ms. Ohiagu: Attached are the forms you requested with the necessary modifications.

| Regards, Don |
|--|
| On Fri, May 9, 2025 at 4:03 PM Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov wrote: |
| Mr. Donald, |
| |
| Received, thank you. |
| |
| There are some minor items identified on the form that need to be updated. |
| |
| Please resubmit the OP-MON: In the OP-MON, the name in the Applicable Regulatory Requirement field should |
| be 30 TAC Chapter 115, Water Separation. The Main Standard should be 115.132(a)(1). Remove the PBR and registrations numbers from the Main Standard field. |
| |
| Please resubmit the OP-REQ1, Page 82: Due to the fact, the permit required additional monitoring. The response |
| to question XI.K.1. should be "Yes" . |
| |
| Thank you, |
| Princess Ohiagu |
| Operating Permits |
| Air Permits Division |
| Texas Commission on Environmental Quality |
| 512 239-2048 |
| Princess.ohiagu@tceq.texas.gov |
| |
| How are we doing? Fill out our online customer satisfaction survey |
| at <u>www.tceq.texas.gov/customersurvey</u> |
| |

From: LaVern Choquette < <u>vchoquette@bearcreekconsultants.com</u> > **Sent:** Thursday, May 8, 2025 11:40 AM To: Princess Ohiagu < Princess. Ohiagu@tceq.texas.gov> Cc: jkeck@expl.com Subject: Re: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station The fugitives are subject to MACT BBBBBB requirements. They should be in the permit. Vern Choquette **Principal Consultant** Bear Creek Consultants 405-615-3757 ...Think about things that are excellent and worthy of praise. –Phil 4:8 On Thu, May 8, 2025 at 11:17 AM Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov wrote: Good morning,

- Upon further permit review, the following items are needed to complete this review:
 - Unit ID: Separator Index Number: R5113-001 requires additional periodic monitoring for 30 TAC 115, Water Separation, citation 115.132(a)(1). Please provide an OP-MON form for Periodic Monitoring using PM Option Number PM-V-049, or PM-V-050 in combination with PM-V-051. These options are from our periodic monitoring guidance specific to oil water separator.
 - Please provide an updated OP-UA3 for units T-2401 through T-2406 based on the attributes you have provided on Table 28b, Page 73; you should continue to answer the next set of attributes for question

| FUG was removed from the permit. FUG is not a storage tank and does not to be on the OP-UA3. |
|--|
| Thank you, |
| Princess Ohiagu |
| Operating Permits |
| Air Permits Division |
| Texas Commission on Environmental Quality |
| 512 239-2048 |
| Princess.ohiagu@tceq.texas.gov |
| How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey |
| |
| Good Evening: |
| I'm sorry I missed you by telephone today. Jarrett Keck forwarded me your email and we had some questions regarding your comments. Please see our note below in red. |

"Closure Device: Enter "YES" if the external floating roof is equipped with a closure device consisting of two seals as specified in 40 CFR § 60.112b(a)(2)(i). Otherwise, enter "NO." (please refer to the form

instructions)

- Resubmit OP-REQ1 to include the current issuance date for NSR Permit 84138, which appears to be 8/08/2018 and to be consistent with the PBRs listed on the OP-PBRSUP. We updated the permit issuance date.
- Submit OP-PBRSUP form to address all PBRs that were listed on form OP-REQ1 and OP-SUM. The PBR Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM. We are confused by this. The seventh bullet point on this list indicates that MSS should not go on the OP-SUM, but here you state that "PBR Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM." Should MSS be listed on this form or not?
- Fill out OP-UA3-Table 28, for 40 CFR Part 63 Subpart BBBBBB (you will get your NSPS Subpart Kb citation directly from 40 CFR Part 63 Subpart BBBBBB) We have attached an updated UA3. Please note that Explorer has elected to list both Kb and WW for the IFR tanks as permitted by BBBBBB.
- Units can only be in the same group unless they have identical attributes and permit shields. Not sure what point you are trying to make. We had the tanks grouped correctly. Since this has caused some confusion, we eliminated the groups.
- Please use the Group ID name on the individual unit attribute form not the individual Unit ID name. There are no more group IDs. Please refer to the previous answer.
- Air Stripper and MSS were not listed on an applicable UA form, therefore these units do not go into the permit. Not sure what point you are making. Do they need to be included in the permit? If so, what UA forms do you need?
- MSS is not classified as an emission unit and does not go on the OP-SUM. It would be addressed on the OP-PBRSUP to include the PBR and registration number for the PBR. We removed MSS from the OP-SUM, but this contradicts bullet point 2 above.
- Please note that fugitive components are addressed in terms and conditions of the permit based on the OP-REQ1. The fugitives are also subject to BBBBBB and listed on UA-3.
- If these tanks were constructed before July 23, 1984 but has NSPS Subpart Kb applicability, Table 3 should not have been filled out. Thanks for the information. The EFR tanks (T-2401 through T-2406) have been removed from the table.

In order to avoid further delay that going back and forth through STEERs would cause, we have attached the Forms for your review. Once you approve the changes, we will upload the Forms through STEERs.

Please respond by May12, 2025 to avoid further delays.

-Best,

Vern Choquette

Principal Consultant

Bear Creek Consultants

405-615-3757

...Think about things that are excellent and worthy of praise. -Phil 4:8

From: Princess Ohiagu

Sent: Friday, April 25, 2025 5:39 PM

To: jkeck@expl.com

Subject: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station

Good evening, Jarrett,

I have been re-assigned to the Federal Operating Permit (FOP) initial issuance application of Permit No. O4493 for Explorer Pipeline Company, Fauna Pipeline Breakout Station, Fauna Pipeline Station. This application has been assigned Project No. 35621. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In order to complete this review, please submit the following information by May 9, 2025:

- Resubmit OP-REQ1 to include the current issuance date for NSR Permit 84138, which appears to be 8/08/2018 and to be consistent with the PBRs listed on the OP-PBRSUP.
- Submit OP-PBRSUP form to address all PBRs that were listed on form OP-REQ1 and OP-SUM. The PBR
 Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM.
- Fill out OP-UA3-Table 28, for 40 CFR Part 63 Subpart BBBBBB (you will get your NSPS Subpart Kb citation directly from 40 CFR Part 63 Subpart BBBBBB)
- Units can only be in the same group unless they have identical attributes and permit shields.
- Please use the Group ID name on the individual unit attribute form not the individual Unit ID name.
- Air Stripper and MSS were not listed on an applicable UA form, therefore these units do not go into the permit.
- MSS is not classified as an emission unit and does not go on the OP-SUM. It would be addressed on the OP-PBRSUP to include the PBR and registration number for the PBR.
- Please note that fugitive components are addressed in terms and conditions of the permit based on the OP-REQ1.
- If these tanks were constructed before July 23, 1984 but has NSPS Subpart Kb applicability, Table 3 should not have been filled out.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

| a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient. |
|---|
| b. Reference to confidential business information (CBI) in NSR permits and PBR submittals. |
| c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments. |
| d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions. |
| If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further. |
| Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. |
| Please notify me when these updates have been submitted. |
| As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents. |
| Please review the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title V/sop wdp factsheet.pdf . This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit. |
| Thank you for your cooperation. |
| Sincerely, |

| Princess Ohiagu |
|---|
| Operating Permits |
| Air Permits Division |
| Texas Commission on Environmental Quality |
| 512 239-2048 |
| Princess.ohiagu@tceq.texas.gov |
| |
| How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey |

--

Donald C. Whitney, P.E. Senior Engineer Manager Bear Creek Consultants

Ofc: 405-531-0600 Cell: 405-410-3644

Form OP-DEL Delegation of Responsible Official Information Federal Operating Permit Program Texas Commission on Environmental Quality

| I. Identifying Information |
|---|
| Account Number: TA-0034-C |
| Regulated Entity Number: RN 100225739 |
| Customer Reference Number: CN 600424584 |
| Permit Number: FOP O4494 |
| Area Name: ARLINGTON PIPELINE BREAKOUT STATION |
| Company Name: EXPLORER PIPELINE COMPANY |
| II. Duly Authorized Representative Information |
| Action Type: |
| New DAR Identification |
| Administrative Information Change |
| Conventional Title: |
| ⊠ Mr. |
| ☐ Mrs. |
| ☐ Ms. |
| ☐ Dr. |
| Name (Driver License/STEERS): JARRETT KECK |
| Title: ENVIRONMENTAL ENGINEER |
| Delegation Effective Date: 12 MAY 2025 |
| Telephone Number: 918 - 493 - 5191 |
| Fax Number: |
| Company Name: EXPLORER PIPELINE COMPANY |
| Mailing Address: 6120 SOUTH YALE AVENUE, SUITE 1100 |
| City: TULSA |
| State: OK |
| ZIP Code: 74136 |
| Email Address: jkeck@expl.com |

Form OP-DEL Delegation of Responsible Official Information Federal Operating Permit Program Texas Commission on Environmental Quality

| III. Certification of Truth, Accuracy, and Completeness |
|---|
| I, LAUREN SANDERS |
| (Name printed or typed: RO for New DAR Identification; RO or DAR for Administrative Information Change) |
| Certify that, based on information and belief formed after reasonable inquiry, the statements, and information stated above are true, accurate, and complete RO signature required for New DAR Identification only; DAR signature required for any Action Type) |
| Responsible Official Signature: |
| Date: 8/26/2026 |
| Duly Authorized Representative Signature: |
| Date: 8-26-25 (Name(s) printed or typed) |
| IV. Removal of Duly Authorized Representative(s) |
| The following should be removed as Duly Authorized Representative(s): |
| (Name(s) printed or typed) |
| Effective Date: |
| Responsible Official Signature: |
| Date: |

Form OP-DEL Delegation of Responsible Official Information Federal Operating Permit Program (Extension)

Texas Commission on Environmental Quality

| V. Additional Identifying Information |
|---------------------------------------|
| Account Number: |
| Regulated Entity Number: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |
| Account Number: |
| Regulated Entity Number: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |
| Account Number: |
| Regulated Entity Number: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |
| Account Number: |
| Responsible Official: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |
| Account Number: |
| Regulated Entity Number: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |

Form OP-DEL Delegation of Responsible Official Information Federal Operating Permit Program Texas Commission on Environmental Quality

| I. Identifying Information |
|---|
| Account Number: HG0889D |
| Regulated Entity Number: RN 100225432 |
| Customer Reference Number: CN 600424584 |
| Permit Number: FOP O4493 |
| Area Name: FAUNA PIPELINE BREAKOUT STATION |
| Company Name: EXPLORER PIPELINE COMPANY |
| II. Duly Authorized Representative Information |
| Action Type: |
| New DAR Identification |
| Administrative Information Change |
| Conventional Title: |
| ⊠ Mr. |
| ☐ Mrs. |
| ☐ Ms. |
| \square Dr. |
| Name (Driver License/STEERS): JARRETT KECK |
| Title: ENVIRONMENTAL ENGINEER |
| Delegation Effective Date: 12 MAY 2025 |
| Telephone Number: 918 - 493 - 5191 |
| Fax Number: |
| Company Name: EXPLORER PIPELINE COMPANY |
| Mailing Address: 6120 SOUTH YALE AVENUE, SUITE 1100 |
| City: TULSA |
| State: OK |
| ZIP Code: 74136 |
| Email Address: jkeck@expl.com |

Form OP-DEL Delegation of Responsible Official Information Federal Operating Permit Program Texas Commission on Environmental Quality

| III. Certification of Truth, Accuracy, and Completeness |
|--|
| I, LAUREN SANDERS |
| (Name printed or typed: RO for New DAR Identification; RO or DAR for Administrative Information Change) |
| Certify that, based on information and belief formed after reasonable inquiry, the statements, and information stated above are true, accurate, and complete. (RO signature required for New DAR Identification only; DAR signature required for any Action Type) Responsible Official Signature: |
| Date: 8/26/2025 |
| Duly Authorized Representative Signature: (Name(s) printed or typed) Date: |
| IV. Removal of Duly Authorized Representative(s) |
| The following should be removed as Duly Authorized Representative(s): |
| (Name(s) printed or typed) |
| Effective Date: |
| Responsible Official Signature: |
| Date: |

Form OP-DEL Delegation of Responsible Official Information Federal Operating Permit Program (Extension)

Texas Commission on Environmental Quality

| V. Additional Identifying Information |
|---------------------------------------|
| Account Number: |
| Regulated Entity Number: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |
| Account Number: |
| Regulated Entity Number: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |
| Account Number: |
| Regulated Entity Number: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |
| Account Number: |
| Responsible Official: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |
| Account Number: |
| Regulated Entity Number: RN |
| Customer Reference Number: CN |
| Permit Number: |
| Area Name: |

Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 Federal Operating Permit Program

| Date: | |
|-------------|--|
| Permit No.: | |
| RN No.: | |

For SOP applications, answer ALL questions unless otherwise directed.

• For GOP applications, answer ONLY these questions unless otherwise directed.

| Form OP-REQ1: Page 1 | | | | | |
|----------------------|---|-------|--|------|-------------|
| I. | Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter | | | er | |
| | A. | Visil | ble Emissions | | |
| * | | 1. | The application area includes stationary vents constructed on or before January 31, 1972. | □YES | □NO |
| * | | 2. | The application area includes stationary vents constructed after January 31, 1972. If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6. If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4. | □YES | □NO |
| • | | 3. | The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972. | □YES | □NO |
| ♦ | | 4. | All stationary vents are addressed on a unit specific basis. | □YES | □NO |
| • | | 5. | Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area. | □YES | □NO |
| ♦ | | 6. | The application area includes structures subject to 30 TAC § 111.111(a)(7)(A). | □YES | □NO |
| * | | 7. | The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A). | □YES | □NO |
| * | | 8. | Emissions from units in the application area include contributions from uncombined water. | □YES | □NO |
| * | | 9. | The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c). | ☐YES | □NO □N/A |

Princess Ohiagu

From: Jarrett Keck <jkeck@expl.com>
Sent: Thursday, June 26, 2025 3:09 PM
To: Princess Ohiagu; Don Whitney

Cc: LaVern Choquette

Subject: RE: Working Draft Permit - FOP O4493/Project 35621, Explorer Pipeline Company/Fauna

Pipeline Breakout Station

Princess, we have reviewed the draft permit and have no comment.

Jarrett Keck, P.E., CHMM Environmental Engineer Explorer Pipeline Company

Email: jkeck@expl.com Desk: (918)-493-5191 Mobile: (918)-809-4386

From: Princess Ohiagu < Princess. Ohiagu@tceq.texas.gov>

Sent: Thursday, June 26, 2025 12:13 PM

To: Don Whitney <dwhitney@bearcreekconsultants.com>

Cc: LaVern Choquette <vchoquette@bearcreekconsultants.com>; Jarrett Keck <jkeck@expl.com>

Subject: [EXTERNAL] Working Draft Permit - FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline

Breakout Station

Good afternoon Mr. Whitney,

I'm following up on the working draft permit that was sent for review on May 30, 2025, and comments were due by June 13, 2025.

Thank you,

Princess Ohiagu
Operating Permits
Air Permits Division
Texas Commission on Environmental Quality
512 239-2048

Princess.ohiagu@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Jarrett Keck < jkeck@expl.com> Sent: Monday, May 12, 2025 3:42 PM To: Princess Ohiagu <Princess.Ohiagu@tceq.texas.gov>; Don Whitney <dwhitney@bearcreekconsultants.com>

Cc: LaVern Choquette < vchoquette@bearcreekconsultants.com>

Subject: RE: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station

Mr. Princess, for future reference, please refer to Mr. Don Whitney correctly. You may refer to him as Mr. Whitney.

Regards,

Jarrett Keck, P.E., CHMM Environmental Engineer Explorer Pipeline Company

Email: jkeck@expl.com Desk: (918)-493-5191 Mobile: (918)-809-4386

From: Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov>

Sent: Monday, May 12, 2025 3:39 PM

To: Don Whitney dwhitney@bearcreekconsultants.com

Cc: Jarrett Keck < jkeck@expl.com >; LaVern Choquette < vchoquette@bearcreekconsultants.com >

Subject: [EXTERNAL] RE: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline

Breakout Station

Hello Mr. Donald,

Please resubmit the attribute for **"Storage Capacity"** on OP-UA3 (Page 3) for Unit IDs T-2407, T-2408 and T-2490 subject to Subpart Kb.

For Unit IDs T-2407, T-2408 and T-2490, an incompatible code for Storage Capacity was chosen. You chose **420K-**, which is restricted to Product Stored codes you didn't choose.

Please choose a code from the top section, as indicated in the instructions for PTLQ-3.

Storage Capacity:

Select one of the following options for the nominal storage capacity of the storage vessel. Enter the code on the form.

For storage vessels with a "Product Stored" designation "PTLQ-3," "PTCD-AF3," "CRUD-AF3," "VOL," or "WASTE:"

| Code | Description | |
|---------|--|--|
| 10K- | Capacity is less than 10,600 gallons (40,000 liters) | |
| 10K-20K | Capacity is greater than or equal to 10,600 gallons but less than 19,813 gallons (capacity is greater than 40,000 liters but less than or equal to 75,000 liters) | |
| 20K-40K | Capacity is greater than or equal to 19,813 gallons but less than 39,890 gallons (capacity is greater than 75,000 liters but less than or equal to 151,000 liters) | |
| 40K+ | Capacity is greater than or equal to 39,890 gallons (151,000 liters) | |

TCEQ - 10008 (APD-ID37v6, Revised 02/25) OP-UA3 This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 02/25)

Page 10 of 126

OP-UA3 Instructions

For storage vessels with a "Product Stored" designation "PTCD-BF3" or "CRUD-BF3:"

| Code | Description |
|-------|--|
| 420K- | Capacity is less than or equal to 420,000 gallons (1,589,874 liters) |
| 420K+ | Capacity is greater than 420,000 gallons (1,589,874 liters) |

From: Don Whitney < dwhitney@bearcreekconsultants.com>

Sent: Monday, May 12, 2025 9:38 AM

To: Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov>

Cc: jkeck@expl.com; LaVern Choquette <vchoquette@bearcreekconsultants.com>

Subject: Re: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station

Ms. Ohiagu: Attached are the forms you requested with the necessary modifications.

Regards, Don

On Fri, May 9, 2025 at 4:03 PM Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov> wrote:

Mr. Donald,

Received, thank you.

There are some minor items identified on the form that need to be updated.

| be 30 TAC Chapter 115, Water Separation. The Main Standard should be 115.132(a)(1). Remove the PBR and registrations numbers from the Main Standard field. | |
|---|--|
| Please resubmit the OP-REQ1, Page 82: Due to the fact, the permit required additional monitoring. The response to question XI.K.1. should be "Yes" . | |
| Thank you, | |
| Princess Ohiagu | |
| Operating Permits | |
| Air Permits Division | |
| Texas Commission on Environmental Quality | |
| 512 239-2048 | |
| Princess.ohiagu@tceq.texas.gov | |
| How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey | |
| From: LaVern Choquette < vchoquette@bearcreekconsultants.com Sent: Thursday, May 8, 2025 11:40 AM To: Princess Ohiagu < princess.Ohiagu@tceq.texas.gov Cc: jkeck@expl.com Subject: Re: Technical Review FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station | |

The fugitives are subject to MACT BBBBBB requirements. They should be in the permit.

| Vern Choquette |
|--|
| Principal Consultant |
| Bear Creek Consultants |
| 405-615-3757 |
| Think about things that are excellent and worthy of praise. —Phil 4:8 |
| On Thu, May 8, 2025 at 11:17 AM Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov wrote: |
| Good morning, |
| Upon further permit review, the following items are needed to complete this review: |
| Unit ID: Separator – Index Number: R5113-001 requires additional periodic monitoring for 30 TAC 115, Water Separation, citation 115.132(a)(1). Please provide an OP-MON form for Periodic Monitoring using PM Option Number PM-V-049, or PM-V-050 in combination with PM-V-051. These options are from our periodic monitoring guidance specific to oil water separator. Please provide an updated OP-UA3 for units T-2401 through T-2406 based on the attributes you have provided on Table 28b, Page 73; you should continue to answer the next set of attributes for question "Closure Device: Enter "YES" if the external floating roof is equipped with a closure device consisting of two seals as specified in 40 CFR § 60.112b(a)(2)(i). Otherwise, enter "NO." (please refer to the form instructions) FUG was removed from the permit. FUG is not a storage tank and does not to be on the OP-UA3. |
| Thank you, |
| Princess Ohiagu |
| Operating Permits |
| Air Permits Division |

| Texas Commission on Environmental Quality | | |
|--|--|--|
| 512 239-2048 | | |
| Princess.ohiagu@tceq.texas.gov | | |
| How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey | | |
| | | |
| Good Evening: | | |
| I'm sorry I missed you by telephone today. Jarrett Keck forwarded me your email and we had some questions regarding your comments. Please see our note below in red. | | |

- Resubmit OP-REQ1 to include the current issuance date for NSR Permit 84138, which appears to be 8/08/2018 and to be consistent with the PBRs listed on the OP-PBRSUP. We updated the permit issuance date.
- Submit OP-PBRSUP form to address all PBRs that were listed on form OP-REQ1 and OP-SUM. The PBR Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM. We are confused by this. The seventh bullet point on this list indicates that MSS should not go on the OP-SUM, but here you state that "PBR Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM." Should MSS be listed on this form or not?
- Fill out OP-UA3-Table 28, for 40 CFR Part 63 Subpart BBBBBB (you will get your NSPS Subpart Kb citation directly from 40 CFR Part 63 Subpart BBBBBB) We have attached an updated UA3. Please note that Explorer has elected to list both Kb and WW for the IFR tanks as permitted by BBBBBB.
- Units can only be in the same group unless they have identical attributes and permit shields. Not sure what point you are trying to make. We had the tanks grouped correctly. Since this has caused some confusion, we eliminated the groups.

- Please use the Group ID name on the individual unit attribute form not the individual Unit ID name. There are no more group IDs. Please refer to the previous answer.
- Air Stripper and MSS were not listed on an applicable UA form, therefore these units do not go into the permit. Not sure what point you are making. Do they need to be included in the permit? If so, what UA forms do you need?
- MSS is not classified as an emission unit and does not go on the OP-SUM. It would be addressed on the OP-PBRSUP to include the PBR and registration number for the PBR. We removed MSS from the OP-SUM, but this contradicts bullet point 2 above.
- Please note that fugitive components are addressed in terms and conditions of the permit based on the OP-REQ1. The fugitives are also subject to BBBBBB and listed on UA-3.
- If these tanks were constructed before July 23, 1984 but has NSPS Subpart Kb applicability, Table 3 should not have been filled out. Thanks for the information. The EFR tanks (T-2401 through T-2406) have been removed from the table.

In order to avoid further delay that going back and forth through STEERs would cause, we have attached the Forms for your review. Once you approve the changes, we will upload the Forms through STEERs.

Please respond by May12, 2025 to avoid further delays.

-Best,

Vern Choquette

Principal Consultant

Bear Creek Consultants

405-615-3757

...Think about things that are excellent and worthy of praise. –Phil 4:8

From: Princess Ohiagu

Sent: Friday, April 25, 2025 5:39 PM

To: jkeck@expl.com

Subject: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station

Good evening, Jarrett,

I have been re-assigned to the Federal Operating Permit (FOP) initial issuance application of Permit No. O4493 for Explorer Pipeline Company, Fauna Pipeline Breakout Station, Fauna Pipeline Station. This application has been assigned Project No. 35621. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In order to complete this review, please submit the following information by May 9, 2025:

- Resubmit OP-REQ1 to include the current issuance date for NSR Permit 84138, which appears to be 8/08/2018 and to be consistent with the PBRs listed on the OP-PBRSUP.
- Submit OP-PBRSUP form to address all PBRs that were listed on form OP-REQ1 and OP-SUM. The PBR
 Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM.
- Fill out OP-UA3-Table 28, for 40 CFR Part 63 Subpart BBBBBB (you will get your NSPS Subpart Kb citation directly from 40 CFR Part 63 Subpart BBBBBB)
- Units can only be in the same group unless they have identical attributes and permit shields.
- Please use the Group ID name on the individual unit attribute form not the individual Unit ID name.
- Air Stripper and MSS were not listed on an applicable UA form, therefore these units do not go into the permit.
- MSS is not classified as an emission unit and does not go on the OP-SUM. It would be addressed on the OP-PBRSUP to include the PBR and registration number for the PBR.
- Please note that fugitive components are addressed in terms and conditions of the permit based on the OP-REQ1.
- If these tanks were constructed before July 23, 1984 but has NSPS Subpart Kb applicability, Table 3 should not have been filled out.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

| Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. |
|---|
| Please notify me when these updates have been submitted. |
| As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at RefAirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents. |
| |
| Please review the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf . This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit. |
| Thank you for your cooperation. |
| Sincerely, |
| |
| Princess Ohiagu |
| Operating Permits |
| Air Permits Division |
| Texas Commission on Environmental Quality |
| 512 239-2048 |
| Princess.ohiagu@tceq.texas.gov |

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| at www.tceq.texas.gov/customers | <u>urvey</u> |
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| | |

--

Donald C. Whitney, P.E. Senior Engineer Manager Bear Creek Consultants

Ofc: 405-531-0600 Cell: 405-410-3644

Princess Ohiagu

From: Jarrett Keck <jkeck@expl.com>
Sent: Monday, May 12, 2025 3:42 PM
To: Princess Ohiagu; Don Whitney

Cc: LaVern Choquette

Subject: RE: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna

Pipeline Breakout Station

Mr. Princess, for future reference, please refer to Mr. Don Whitney correctly. You may refer to him as Mr. Whitney.

Regards,

Jarrett Keck, P.E., CHMM Environmental Engineer Explorer Pipeline Company

Email: jkeck@expl.com Desk: (918)-493-5191 Mobile: (918)-809-4386

From: Princess Ohiagu < Princess. Ohiagu@tceq.texas.gov>

Sent: Monday, May 12, 2025 3:39 PM

To: Don Whitney <dwhitney@bearcreekconsultants.com>

Cc: Jarrett Keck < jkeck@expl.com>; LaVern Choquette < vchoquette@bearcreekconsultants.com>

Subject: [EXTERNAL] RE: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline

Breakout Station

Hello Mr. Donald.

Please resubmit the attribute for **"Storage Capacity"** on OP-UA3 (Page 3) for Unit IDs T-2407, T-2408 and T-2490 subject to Subpart Kb.

For Unit IDs T-2407, T-2408 and T-2490, an incompatible code for Storage Capacity was chosen. You chose **420K-**, which is restricted to Product Stored codes you didn't choose.

Please choose a code from the top section, as indicated in the instructions for PTLQ-3.

Storage Capacity:

Select one of the following options for the nominal storage capacity of the storage vessel. Enter the code on the form.

For storage vessels with a "Product Stored" designation "PTLQ-3," "PTCD-AF3," "CRUD-AF3," "VOL," or "WASTE:"

| Code | Description | |
|---------|--|--|
| 10K- | Capacity is less than 10,600 gallons (40,000 liters) | |
| 10K-20K | Capacity is greater than or equal to 10,600 gallons but less than 19,813 gallons (capacity greater than 40,000 liters but less than or equal to 75,000 liters) | |
| 20K-40K | Capacity is greater than or equal to 19,813 gallons but less than 39,890 gallons (capacity is greater than 75,000 liters but less than or equal to 151,000 liters) | |
| 40K+ | Capacity is greater than or equal to 39,890 gallons (151,000 liters) | |

TCEQ - 10008 (APD-ID37v6, Revised 02/25) OP-UA3 This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 02/25)

Page 10 of 126

OP-UA3 Instructions

For storage vessels with a "Product Stored" designation "PTCD-BF3" or "CRUD-BF3:"

| Code | Description |
|-------|--|
| 420K- | Capacity is less than or equal to 420,000 gallons (1,589,874 liters) |
| 420K+ | Capacity is greater than 420,000 gallons (1,589,874 liters) |

From: Don Whitney < dwhitney@bearcreekconsultants.com>

Sent: Monday, May 12, 2025 9:38 AM

To: Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov>

Cc: jkeck@expl.com; LaVern Choquette <vchoquette@bearcreekconsultants.com>

Subject: Re: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station

Ms. Ohiagu: Attached are the forms you requested with the necessary modifications.

Regards, Don

On Fri, May 9, 2025 at 4:03 PM Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov> wrote:

Mr. Donald,

Received, thank you.

There are some minor items identified on the form that need to be updated.

| Please resubmit the OP-MON: In the OP-MON, the name in the Applicable Regulatory Requirement field should be 30 TAC Chapter 115, Water Separation. The Main Standard should be 115.132(a)(1). Remove the PBR and registrations numbers from the Main Standard field. |
|---|
| Please resubmit the OP-REQ1, Page 82: Due to the fact, the permit required additional monitoring. The response to question XI.K.1. should be "Yes" . |
| Thank you, |
| Princess Ohiagu |
| Operating Permits |
| Air Permits Division |
| Texas Commission on Environmental Quality |
| 512 239-2048 |
| Princess.ohiagu@tceq.texas.gov |
| |
| How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey |
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| From: LaVern Choquette < vchoquette@bearcreekconsultants.com Sent: Thursday, May 8, 2025 11:40 AM To: Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov Cc: jkeck@expl.com Subject: Re: Technical Review FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station |

Subject: Re: Technical Review -- FOP 04493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Brea

The fugitives are subject to MACT BBBBBB requirements. They should be in the permit.

| Vern Choquette |
|--|
| Principal Consultant |
| Bear Creek Consultants |
| 405-615-3757 |
| Think about things that are excellent and worthy of praise. —Phil 4:8 |
| On Thu, May 8, 2025 at 11:17 AM Princess Ohiagu < Princess.Ohiagu@tceq.texas.gov > wrote: |
| Good morning, |
| Upon further permit review, the following items are needed to complete this review: |
| Unit ID: Separator – Index Number: R5113-001 requires additional periodic monitoring for 30 TAC 115, Water Separation, citation 115.132(a)(1). Please provide an OP-MON form for Periodic Monitoring using PM Option Number PM-V-049, or PM-V-050 in combination with PM-V-051. These options are from our periodic monitoring guidance specific to oil water separator. Please provide an updated OP-UA3 for units T-2401 through T-2406 based on the attributes you have provided on Table 28b, Page 73; you should continue to answer the next set of attributes for question "Closure Device: Enter "YES" if the external floating roof is equipped with a closure device consisting of two seals as specified in 40 CFR § 60.112b(a)(2)(i). Otherwise, enter "NO." (please refer to the form instructions) FUG was removed from the permit. FUG is not a storage tank and does not to be on the OP-UA3. |
| Thank you, |
| Princess Ohiagu |
| Operating Permits |
| Air Permits Division |

Texas Commission on Environmental Quality 512 239-2048 Princess.ohiagu@tceq.texas.gov How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey Good Evening: I'm sorry I missed you by telephone today. Jarrett Keck forwarded me your email and we had some questions regarding your comments. Please see our note below in red.

• Resubmit OP-REQ1 to include the current issuance date for NSR Permit 84138, which appears to be 8/08/2018 and to be consistent with the PBRs listed on the OP-PBRSUP. We updated the permit

issuance date.

- Submit OP-PBRSUP form to address all PBRs that were listed on form OP-REQ1 and OP-SUM. The PBR Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM. We are confused by this. The seventh bullet point on this list indicates that MSS should not go on the OP-SUM, but here you state that "PBR Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM." Should MSS be listed on this form or not?
- Fill out OP-UA3-Table 28, for 40 CFR Part 63 Subpart BBBBBB (you will get your NSPS Subpart Kb citation directly from 40 CFR Part 63 Subpart BBBBBB) We have attached an updated UA3. Please note that Explorer has elected to list both Kb and WW for the IFR tanks as permitted by BBBBBB.
- Units can only be in the same group unless they have identical attributes and permit shields. Not sure what point you are trying to make. We had the tanks grouped correctly. Since this has caused some confusion, we eliminated the groups.

• Please use the Group ID name on the individual unit attribute form not the individual Unit ID name. There are no more group IDs. Please refer to the previous answer.

• Air Stripper and MSS were not listed on an applicable UA form, therefore these units do not go into the permit. Not sure what point you are making. Do they need to be included in the permit? If so,

what UA forms do you need?

• MSS is not classified as an emission unit and does not go on the OP-SUM. It would be addressed on the OP-PBRSUP to include the PBR and registration number for the PBR. We removed MSS from the

OP-SUM, but this contradicts bullet point 2 above.

• Please note that fugitive components are addressed in terms and conditions of the permit based on

the OP-REQ1. The fugitives are also subject to BBBBBB and listed on UA-3.

• If these tanks were constructed before July 23, 1984 but has NSPS Subpart Kb applicability, Table 3 should not have been filled out. Thanks for the information. The EFR tanks (T-2401 through T-2406)

have been removed from the table.

In order to avoid further delay that going back and forth through STEERs would cause, we have attached the Forms for your review. Once you approve the changes, we will upload the Forms through STEERs.

Please respond by May12, 2025 to avoid further delays.

-Best,

Vern Choquette

Principal Consultant

Bear Creek Consultants

405-615-3757

...Think about things that are excellent and worthy of praise. -Phil 4:8

From: Princess Ohiagu

Sent: Friday, April 25, 2025 5:39 PM

To: jkeck@expl.com

Subject: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna Pipeline Breakout Station

Good evening, Jarrett,

I have been re-assigned to the Federal Operating Permit (FOP) initial issuance application of Permit No. O4493 for Explorer Pipeline Company, Fauna Pipeline Breakout Station, Fauna Pipeline Station. This application has been assigned Project No. 35621. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In order to complete this review, please submit the following information by May 9, 2025:

- Resubmit OP-REQ1 to include the current issuance date for NSR Permit 84138, which appears to be 8/08/2018 and to be consistent with the PBRs listed on the OP-PBRSUP.
- Submit OP-PBRSUP form to address all PBRs that were listed on form OP-REQ1 and OP-SUM. The PBR
 Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM.
- Fill out OP-UA3-Table 28, for 40 CFR Part 63 Subpart BBBBBB (you will get your NSPS Subpart Kb citation directly from 40 CFR Part 63 Subpart BBBBBB)
- Units can only be in the same group unless they have identical attributes and permit shields.
- Please use the Group ID name on the individual unit attribute form not the individual Unit ID name.
- Air Stripper and MSS were not listed on an applicable UA form, therefore these units do not go into the permit.
- MSS is not classified as an emission unit and does not go on the OP-SUM. It would be addressed on the OP-PBRSUP to include the PBR and registration number for the PBR.
- Please note that fugitive components are addressed in terms and conditions of the permit based on the OP-REQ1.
- If these tanks were constructed before July 23, 1984 but has NSPS Subpart Kb applicability, Table 3 should not have been filled out.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

| Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1. |
|---|
| Please notify me when these updates have been submitted. |
| As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at RefAirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents. |
| |
| Please review the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf . This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit. |
| Thank you for your cooperation. |
| Sincerely, |
| |
| Princess Ohiagu |
| Operating Permits |
| Air Permits Division |
| Texas Commission on Environmental Quality |
| 512 239-2048 |
| Princess.ohiagu@tceq.texas.gov |

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

--

Donald C. Whitney, P.E. Senior Engineer Manager Bear Creek Consultants

Ofc: 405-531-0600 Cell: 405-410-3644

Storage Tank/Vessel Attributes Form OP-UA3 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) Texas Commission on Environmental Quality

| Date | Permit No. | Regulated Entity No. |
|-----------|-------------|----------------------|
| 5/12/2025 | TBD-Initial | RN100225432 |

| Unit ID No. | SOP/GOP Index No. | Product Stored | Storage Capacity | WW Tank Control | Maximum TVP | Storage Vessel Description | AMEL ID No. | Guidepole | Reid Vapor Pressure | Control Device ID No. |
|-------------|----------------------|-------------------|---------------------|--------------------|----------------|-------------------------------|----------------|-----------|------------------------|-----------------------------|
| T-2407 | 60Kb | PTLQ-3 | 40K+ | IFR | | IFR-MT | | SLEEVE | | |
| T-2408 | 60Kb | PTLQ-3 | 40K+ | IFR | | IFR-MT | | SLEEVE | | |
| T-2490 | 60Kb | PTLQ-3 | 40K+ | IFR | | IFR-MT | | SLEEVE | | |
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Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 1) Federal Operating Permit Program

Table 1a: CAM/PM Additions

| I. Identifying Information | | | | |
|--|---------------|-----------------------|-----|-----------|
| Account No.: HG0889D | RN No.: 100 | 0225432 | CN: | 600424584 |
| Permit No.: FOP O4493 | | Project No.: 35621 | | |
| Area Name: FAUNA PIPELINE BREAK | COUT STATI | ON | | |
| Company Name: EXPLORER PIPELINE | COMPANY | | | |
| II. Unit/Emission Point/Group/Proces | ss Informatio | on | | |
| Revision No.: 2 | | | | |
| Unit/EPN/Group/Process ID No.: SEPAR | ATOR Index | Number R5113-001 | | |
| Applicable Form: OP-UA14 | | | | |
| III. Applicable Regulatory Requireme | nt | | | |
| Name: 30 TAC Chapter 115, Water Sepa | ration | | | |
| SOP/GOP Index No.: R5113-001 | | | | |
| Pollutant: VOC | | | | |
| Main Standard: 115.132(a)(1) | | | | |
| IV. Title V Monitoring Information | | | | |
| Monitoring Type: PM | | | | |
| Unit Size: N/A | | | | |
| CAM/PM Option No.: PM-V-050 | (annually) | | | |
| Deviation Limit: 10,000 ppmv for a seal the 500 ppmv for other leak interfaces | at passes thr | ough a cover opening. | | |
| CAM/PM Option No.: PM-V-051 | (monthly) | | | |
| Deviation Limit: Any gap or crack in a sea | led opening | | | |
| V. Control Device Information | | | | |
| Control Device ID No.: | | | | |
| Control Device Type: | | | | |

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 2) Federal Operating Permit Program

Table 1b: CAM/PM Control Device Additions

| Emission Unit ID No. | Control Device ID No. | Control Device Type |
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Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 3)

Federal Operating Permit Program Table 1c: CAM/PM Case-By-Case Additions

| I. | Identifying Information | | | |
|-------|--------------------------------|-----------------|---------------|--------|
| Acco | unt No.: | RN No.: | | CN: |
| Perm | nit No: | | Project No.: | |
| Area | Name: | | | |
| Com | pany Name: | | | |
| II. | Unit/Emission Point/Group/Pro | cess Informatio | on | |
| Revi | sion No.: | | | |
| Unit/ | EPN/Group/Process ID No.: | | | |
| Appli | cable Form: | | | |
| III. | Applicable Regulatory Require | ment | | |
| Nam | e: | | | |
| SOP | /GOP Index No.: | | | |
| Pollu | tant: | | | |
| Main | Standard: | | | |
| Moni | toring Type: | | | |
| Unit | Size: | | | |
| Devi | ation Limit: | | | |
| IV. | Control Device Information | | | |
| Cont | rol Device ID No.: | | | |
| Devi | се Туре: | | | |
| V. | CAM Case-by-case | | | |
| Indic | ator: | | | |
| Minir | num Frequency: | | | |
| Aver | aging Period: | | | |
| QA/C | QC Procedures: | | | |
| Verif | ication Procedures: | | | |
| Repr | esentative Date: | | | |
| VI. | Periodic Monitoring Case-by-ca | ase | T | |
| Indic | ator: | | Minimum Frequ | uency: |
| Aver | aging Period: | | | |
| Perio | odic Monitoring Text: | | | |

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 4) Federal Operating Permit Program

Table 1d: CAM/PM Case-By-Case Control Device Additions

| Emission Unit ID No. | Control Device ID No. | Control Device Type |
|----------------------|-----------------------|---------------------|
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Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 5) Federal Operating Permit Program

Table 2a: CAM/PM Deletions

| I. | Identifying Information |
|---------|---|
| Accou | ınt No.: |
| RN No | 0.: |
| CN: | |
| Permi | t No.: |
| Projec | et No.: |
| Area I | Name: |
| Comp | any Name: |
| II. | Unit/Emission Point/Group/Process Information |
| Revisi | ion No.: |
| Unit/E | PN/Group/Process ID No.: |
| Applic | cable Form: |
| III. | Applicable Regulatory Requirement |
| Name | |
| SOP/0 | GOP Index No.: |
| Polluta | ant: |
| Main : | Standard: |
| IV. | Title V Monitoring Information |
| Monito | oring Type: |
| CAM/ | PM Option No.: |
| V. | Control Device Information |
| Contro | ol Device ID No.: |
| Contro | ol Device Type: |
| VI. | Type of Deletion |
| Monito | oring Requirement: |
| Contro | ol Device: |

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 6)

Table 2b: CAM/PM Control Device Deletions

| Emission Unit ID No. | Control Device ID No. | Control Device Type |
|----------------------|-----------------------|---------------------|
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Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 7) Federal Operating Permit Program

Table 2c: CAM/PM Case-By-Case Deletions

| I. | Identifying Information |
|---------|---|
| Accour | nt No.: |
| RN No | .: |
| CN: | |
| Permit | No.: |
| Project | : No.: |
| Area N | ame: |
| Compa | any Name: |
| II. | Unit/Emission Point/Group/Process Information |
| Revisio | on No.: |
| Unit/EF | PN/Group/Process ID No.: |
| Applica | able Form: |
| III. | Applicable Regulatory Requirement |
| Name: | |
| SOP/G | OP Index No.: |
| Polluta | nt: |
| Main S | tandard: |
| IV. | Title V Monitoring Information |
| Monito | ring Type: |
| V. | Control Device Information |
| Contro | I Device ID No.: |
| Contro | I Device Type: |
| VI. | Type of Deletion |
| Monito | ring Requirement: |
| Contro | I Device: |

Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 8) Federal Operating Permit Program

Table 2d: CAM/PM Case-By-Case Device Deletions

| Emission Unit ID NO. | Control Device ID No. | Control Device Type |
|----------------------|-----------------------|---------------------|
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Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 Federal Operating Permit Program

| Date: | |
|-------------|--|
| Permit No.: | |
| RN No.: | |

For SOP applications, answer ALL questions unless otherwise directed.

• For GOP applications, answer ONLY these questions unless otherwise directed.

| Forn | Form OP-REQ1: Page 82 | | | | | | |
|----------|-----------------------|---|--|------|-----|--|--|
| XI. | Misc | ellane | ous (continued) | | | | |
| | J. | J. Title 30 TAC Chapter 101, Subchapter H (continued) | | | | | |
| * | | 4. | The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO_X . | □YES | □NO | | |
| * | | 5. | The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I. | □YES | □NO | | |
| * | | 6. | The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly-reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2. | □YES | □NO | | |
| • | | 7. | The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program. | □YES | □NO | | |
| | K. | Perio | odic Monitoring | | | | |
| * | | 1. | The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application. | □YES | □NO | | |
| ♦ | | 2. | The permit currently contains at least one periodic monitoring requirement. If the responses to Questions XI.K.1 and XI.K.2 are both "NO," go to Section XI.L. | □YES | □NO | | |
| * | | 3. | All periodic monitoring requirements are being removed from the permit with this application. | □YES | □NO | | |

Storage Tank/Vessel Attributes Form OP-UA3 (Page 1)

Federal Operating Permit Program

Table 1: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart K: Standards of Performance for Storage Vessels for Petroleum Liquids
Texas Commission on Environmental Quality

| Date | Permit No. | Regulated Entity No. |
|------|------------|----------------------|
| | | |

| Unit ID No. | SOP/GOP Index No. | Construction/ Modification Date | Storage Capacity | Product Stored | True Vapor Pressure | Storage Vessel Description | Reid Vapor Pressure | Maximum TVP | Estimated TVP | Control Device ID No. |
|-------------|----------------------|---------------------------------------|---------------------|-------------------|------------------------|----------------------------------|------------------------|----------------|------------------|--------------------------|
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Texas Commission on Environmental Quality Monitoring Requirements Form OP-MON (Page 1) Federal Operating Permit Program

Table 1a: CAM/PM Additions

| I. Identifying Information | | | | |
|---|---------------|---------|----------------|-------------------------|
| Account No.: HG0889D | RN No.: 100 |)22543 | 2 | CN: 600424584 |
| Permit No.: FOP O4493 | | Projec | t No.: 35621 | |
| Area Name: FAUNA PIPELINE BREAK | OUT STATI | ON | | |
| Company Name: EXPLORER PIPELINE | COMPANY | | | |
| II. Unit/Emission Point/Group/Proces | s Informatio | n | | |
| Revision No.: 1 | | | | |
| Unit/EPN/Group/Process ID No.: SEPARA | ATOR Index | Numbe | er R5113-001 | |
| Applicable Form: OP-UA14 | | | | |
| III. Applicable Regulatory Requirement | nt | | | |
| Name: 115.132(a)(1) | | | | |
| SOP/GOP Index No.: R5113-001 | | | | |
| Pollutant: VOC | | | | |
| Main Standard: PBR 106.263 and 106.53 | 2 Perr | nit No. | 84138 F | Registration No. 117263 |
| IV. Title V Monitoring Information | | | | |
| Monitoring Type: PM | | | | |
| Unit Size: N/A | | | | |
| CAM/PM Option No.: PM-V-050 | (annually) | | | |
| Deviation Limit: 10,000 ppmv for a seal th 500 ppmv for other leak interfaces | at passes thr | ough a | cover opening. | |
| CAM/PM Option No.: PM-V-051 | (monthly) | | | |
| Deviation Limit: Any gap or crack in a sea | led opening | | | |
| V. Control Device Information | | | | |
| Control Device ID No.: | | | | |
| Control Device Type: | | | | |

From: Princess Ohiagu

Sent: Friday, April 25, 2025 5:39 PM

To: jkeck@expl.com

Subject: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna

Pipeline Breakout Station

Good evening, Jarrett,

I have been re-assigned to the Federal Operating Permit (FOP) initial issuance application of Permit No. O4493 for Explorer Pipeline Company, Fauna Pipeline Breakout Station, Fauna Pipeline Station. This application has been assigned Project No. 35621. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In order to complete this review, please submit the following information by May 9, 2025:

- Resubmit OP-REQ1 to include the current issuance date for NSR Permit 84138, which appears to be 8/08/2018 and to be consistent with the PBRs listed on the OP-PBRSUP.
- Submit OP-PBRSUP form to address all PBRs that were listed on form OP-REQ1 and OP-SUM. The PBR
 Supplemental table should list all PBRs at the site and should be consistent with the PBRs listed on OP-REQ1 and OP-SUM.
- Fill out OP-UA3-Table 28, for 40 CFR Part 63 Subpart BBBBBB (you will get your NSPS Subpart Kb citation directly from 40 CFR Part 63 Subpart BBBBBB)
- Units can only be in the same group unless they have identical attributes and permit shields.
- Please use the Group ID name on the individual unit attribute form not the individual Unit ID name.
- Air Stripper and MSS were not listed on an applicable UA form, therefore these units do not go into the permit.
- MSS is not classified as an emission unit and does not go on the OP-SUM. It would be addressed on the OP-PBRSUP to include the PBR and registration number for the PBR.
- Please note that fugitive components are addressed in terms and conditions of the permit based on the OP-REQ1.
- If these tanks were constructed before July 23, 1984 but has NSPS Subpart Kb applicability, Table 3 should not have been filled out.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1.

Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary Form OP-SUM

Table 1

| Date | Permit No. | Regulated Entity No. |
|------------|--------------|----------------------|
| 04/30/2025 | TBD- Initial | RN100225432 |

| Unit/Process ID No. | Applicable Form | Unit Name/Description | CAM | Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106 | Preconstruction Authorizations Title I | Group ID No. |
|------------------------|--------------------|-----------------------|-----|--|---|--------------|
| T-2401 | OP-UA3 | Tank 2401 | | NSR-84138 | | |
| T-2402 | OP-UA3 | Tank 2402 | | NSR-84138 | | |
| T-2403 | OP-UA3 | Tank 2403 | | NSR-84138 | | |
| T-2404 | OP-UA3 | Tank 2404 | | NSR-84138 | | |
| T-2405 | OP-UA3 | Tank 2405 | | NSR-84138 | | |
| T-2406 | OP-UA3 | Tank 2406 | | NSR-84138 | | |
| T-2407 | OP-UA3 | Tank 2407 | | PBR §106.478 9/4/00[137284] | | |
| T-2408 | OP-UA3 | Tank 2408 | | PBR §106.478 9/4/00[137284] | | |
| T-2490 | OP-UA3 | Tank 2490 | | PBR §106.478 9/4/00[137284] | | |
| FUG | OP-UA3 | Fugitive Components | | NSR-84138, §106.261 11/1/03 | | |
| SEPARATOR | OP-UA14 | Oil/Water Separator | | PBR §106.532 9/4/00[117263] | | |
| AIR STRIPPER | OP-UA1 | Air Stripper | | PBR §106.532 9/4/00[117263] | | |
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TCEQ 10007 (APDG 5837v9, Revised 05/20) OP-SUM This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

| Page | of | |
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Permit By Rule Supplemental Table (Page 1) Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area Texas Commission on Environmental Quality

| Date | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/30/2025 | TBD | RN100225432 |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|----------------------------|------------------|--------------------|-------------------|
| MSS | 117263 | §106.263 | 3/10/2014 |
| Air Stripper | 117263 | §106.532 | 3/10/2014 |
| T-2407, T-2408, and T-2490 | 137284 | §106.478, §106.261 | 1/19/2023 |
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Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 Federal Operating Permit Program

| Date: | 04/30/2025 |
|-------------|---------------|
| Permit No.: | TBD - Initial |
| RN No.: | RN100225432 |

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.

| For | Form OP-REQ1: Page 1 | | | | | | |
|----------|----------------------|---------|--|-----------|-------------|--|--|
| I. | Title | e 30 T. | AC Chapter 111 - Control of Air Pollution from Visible Emissions and Particu | late Matt | er | | |
| | Α. | Visi | ble Emissions | | | | |
| * | | 1. | The application area includes stationary vents constructed on or before January 31, 1972. | YES | ⊠NO | | |
| * | | 2. | The application area includes stationary vents constructed after January 31, 1972. If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6. If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4. | □YES | ⊠NO | | |
| • | | 3. | The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972. | □YES | ⊠NO | | |
| ♦ | | 4. | All stationary vents are addressed on a unit specific basis. | □YES | ⊠NO | | |
| • | | 5. | Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area. | □YES | ⊠NO | | |
| ♦ | | 6. | The application area includes structures subject to 30 TAC § 111.111(a)(7)(A). | □YES | ⊠NO | | |
| * | | 7. | The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A). | □YES | ⊠NO | | |
| * | | 8. | Emissions from units in the application area include contributions from uncombined water. | □YES | ⊠NO | | |
| • | | 9. | The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c). | □YES | □NO ⊠N/A | | |

Storage Tank/Vessel Attributes Form OP-UA3 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) Texas Commission on Environmental Quality

| Date | Permit No. | Regulated Entity No. |
|-----------|-------------|----------------------|
| 4/30/2025 | TBD-Initial | RN100225432 |

| Unit ID No. | SOP/GOP Index No. | Product Stored | Storage Capacity | WW Tank Control | Maximum TVP | Storage Vessel Description | AMEL ID No. | Guidepole | Reid Vapor Pressure | Control Device ID No. |
|-------------|----------------------|-------------------|---------------------|--------------------|----------------|-------------------------------|----------------|-----------|------------------------|-----------------------------|
| T-2407 | 60Kb | PTLQ-3 | 420K- | IFR | | IFR-MT | | SLEEVE | | |
| T-2408 | 60Kb | PTLQ-3 | 420K+ | IFR | | IFR-MT | | SLEEVE | | |
| T-2490 | 60Kb | PTLQ-3 | 420K+ | IFR | | IFR-MT | | SLEEVE | | |
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From: Princess Ohiagu

Sent: Tuesday, August 13, 2024 3:42 PM

To: jkeck@expl.com

Subject: Technical Review -- FOP O4493/Project 35621, Explorer Pipeline Company/Fauna

Pipeline Breakout Station

Good afternoon,

I have been reassigned to the Federal Operating Permit (FOP) initial issuance application of Permit No. O4493 for Explorer Pipeline Company, Fauna Pipeline Breakout Station. This application has been assigned Project No. 35621. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high-level terms are sometimes used in SOPs when unit attribute forms have

not yet been updated due to regulatory amendments.

d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents.

Please review the "SOP Technical Review Fact Sheet" located

at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

From: LaVern Choquette < vchoquette@bearcreekconsultants.com>

Sent: Sunday, May 5, 2024 12:27 PM

To: Emilio Jamerlan
Cc: Jarrett Keck

Subject: Explorer Pipeline Company - Fauna Station

Attachments: OP-UA14 29 Apr 2024.pdf; Form OP-UA1 29 Apr 2024.pdf; OP-SUM 29 Apr 2024.pdf;

OP-UA3 29 Apr 2024.pdf

Mr. Jamerlan:

The updated forms you requested for Explorer Pipeline Company are attached. They have also been uploaded into STEERS.

Vern Choquette Principal Consultant Bear Creek Consultants 405-615-3757

...Think about things that are excellent and worthy of praise. -Phil 4:8

During my technical review of your application, I found the following deficiencies

- OP-SUMR: FUG / MSS A group cannot consist of one unit
- OP-UA1: AIR STRIPPER When filling out any OP- UA form you must provide a Index number for the Unit ID. Please resubmit your OP-UA1 form and provide an index No for unit ID AIR STRIPPER.
- Emission units Separator and Air Stripper cannot be in the same group if they are entered on different UA forms.
- OP-SUM: Units T-2407 / T-2490 Emission units T-2407 and T-2490 cannot be a part of Group GRP-TANKS as they have different attributes then the rest of emission units in GRP-TANKS. Groups must consist of Emission units have all have the same attributes and on the same UA form.
- OP-UA3: GRP-TANKS / T-2407 / T-2490 for question (3-3) Storage capacity response A40K+ is not a valid response did you mean 40K+?

Please respond with updates by 5/1/2024

Sincerely,

Emilio Jamerlan

From: Emilio Jamerlan

Sent: Friday, April 26, 2024 3:35 PM

To: LaVern Choquette

Subject: RE: NOD/RFI -- O1675/Project 35621, Explorer Pipeline Company

Hello LaVern,

Please provide a response to the comments bellow by 5/6/2024

Sincerely,
Emilio Jamerlan
Air Permits Division
Texas Commission on Environmental Quality
P.O. Box 13087, MC 163
Austin, TX 78711

Office: 5122391517

How are we doing? Fill out our online customer satisfaction survey at https://www.tceq.texas.gov/customersurvey

From: LaVern Choquette < vchoquette@bearcreekconsultants.com >

Sent: Friday, April 26, 2024 3:21 PM

To: Emilio Jamerlan < Emilio Jamerlan@tceq.texas.gov>

Subject: Re: NOD/RFI -- O1675/Project 35621, Explorer Pipeline Company

I'm out of the office until May 2nd.

On Fri, Apr 26, 2024, 8:17 AM Emilio Jamerlan < Emilio_Jamerlan@tceq.texas.gov wrote:

Hello LaVern

During my technical review of your application, I found the following deficiencies

- OP-SUMR: FUG / MSS A group cannot consist of one unit
- OP-UA1: AIR STRIPPER When filling out any OP- UA form you must provide a Index number for the Unit ID. Please resubmit your OP-UA1 form and provide an index No for unit ID AIR STRIPPER.
- Emission units Separator and Air Stripper cannot be in the same group if they are entered on different UA forms.
- OP-SUM: Units T-2407 / T-2490 Emission units T-2407 and T-2490 cannot be a part of Group GRP-TANKS as they have different attributes then the rest of emission units in GRP-TANKS. Groups must consist of Emission units have all have the same attributes and on the same UA form.
- OP-UA3: GRP-TANKS / T-2407 / T-2490 for question (3-3) Storage capacity response A40K+ is not a valid response did you mean 40K+?

Please respond with updates by 5/1/2024

From: Emilio Jamerlan < Emilio. Jamerlan@tceq.texas.gov>

Sent: Wednesday, October 25, 2023 4:11 PM

To: LaVern Choquette < vchoquette@bearcreekconsultants.com >

Subject: Technical Review -- FOP O1675/Project 35621, EXPLORER PIPELINE COMPANY

Hello LaVern,

I have been assigned to the Federal Operating Permit (FOP) initial application of Permit No. O1675 for EXPLORER PIPELINE COMPANY. This application has been assigned Project No. 35621. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional

From: <u>eNotice TCEQ</u>

To: <u>John.whitmire@senate.texas.gov</u>; <u>jolanda.jones@house.texas.gov</u>

Subject: TCEQ Notice - Permit Number O4493

Date: Tuesday, September 26, 2023 11:03:18 AM

Attachments: TCEQ Notice - O4493 35621.pdf

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at http://www.tceq.state.tx.us/help/policies/electronic_info_policy.html.

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Jesse Chacon, P.E. with the Air Permits Division at (512) 239-5759.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (http://get.adobe.com/reader) to download the free Adobe Acrobat Reader software.

Jon Niermann, *Chairman*Emily Lindley, *Commissioner*Bobby Janecka, *Commissioner*Kelly Keel, *Interim Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 26, 2023

THE HONORABLE JOHN WHITMIRE TEXAS SENATE PO BOX 12068 AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Initial Issuance Application

Project Number: 35621 Permit Number: 04493 Explorer Pipeline Company Fauna Pipeline Station Houston, Harris County

Regulated Entity Number: RN100225432 Customer Reference Number: CN600424584

Dear Senator Whitmire:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) initial issuance application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. https://gisweb.tceq.texas.gov/LocationMapper/?marker=95.179576,29.816346&level=13.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site. The FOP identifies and codifies air emission requirements (known as applicable requirements) that apply to the emission units at the site. The FOP does not authorize construction of emission units or emissions from those units. The New Source Review (NSR) permit is the mechanism for these authorizations.

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TEXAS STATE (



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Sen. John Whitmire (D)

Last modified on: 01-11-2023 20:45:17

◆ Back to Texas Senate (/online/txsenate/)

TX Senator (Texas Senate (/online/txsenate/))

Entered Office: 01-1983 Term Ends: 01-2025

District: 15

General Information

Profession: Attorney Home Town: Houston Birthdate: 08-13-1949

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Personal Information

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Rep. Jolanda "Jo" Jones (D)

Last modified on: 06-29-2023 14:05:26

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TX House Representative (Texas House of Representatives (/online/txhouse/))

Entered Office: 05-2022

District: 147

General Information

Profession: Attorney Home Town: Houston Birthdate: 11-06-1965

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North Channel Branch Library

Harris County, TX

Address: 15741 Wallisville Road Houston, Texas 77049-4607

77049-4607 United States

County: Harris

Region: Houston Area
Phone: 281-457-1631

Connect to: Library Web Site ✓ Online Catalog

Library details: North Channel Branch Library is a Public library.

This library is affiliated with Harris County Public Library (view map) . The collection of the library contains 88,822 volumes. The library circulates 363,228 items per year.

Permalink: https://librarytechnology.org/library/24359
(Use this link to refer back to this listing.)

Organizational structure: This is a publicly funded and managed library.

See also: Directory of Public Libraries in the United States

See also: Directory of Public Libraries in Texas

Collection size88,822volumesAnnual Circulation363,228transactions

Wireless: The library offers wireless access to the Internet.

| Technol | ogy Profile | |
|--|--------------------|-----------------|
| | Product Name | Year Contracted |
| Current Automation System | Symphony | 201 |
| Previous Automation System | Horizon | 200 |
| Previous Automation System | Dynix | 1994 |
| Previous Automation System | Carl | 1990 |
| Previous Automation System | UTLAS | 1985 |
| Discovery Interface | BiblioCore | 2022 |
| Previous Discovery Interface | Enterprise | 2015 |
| Web Content Management | BiblioWeb | |
| (* Older versions of SirsiDynix Symphony wer | re called Unicorn) | |



North Channel Branch Library



Related Libraries

- Other members of Harmonic Consortium
- Libraries located in Houston (Texas)
- Libraries located in Harris county (Texas)
- View map of libraries in Harris County
- all Public libs in Texas
- United States
- Automation systems in Texas

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This entry is from the Directory of Public Libraries in the United States.

This entry is from the Directory of Public Libraries in Texas .

From: <u>Johnny Bowers</u>
To: <u>Rosa Mora-Nichols</u>

Subject: FW: STEERS Title V Application Submittal (New Application)

Date: Friday, September 22, 2023 7:43:31 AM

Please process. Thanks!

----Original Message-----

From: steers@tceq.texas.gov <steers@tceq.texas.gov>

Sent: Thursday, September 21, 2023 11:18 AM

To: RFCAIR12 <RFCAIR12@tceq.texas.gov>; air permits@pcs.hctx.net; donald.richner@houstontx.gov;

TVAPPS <tvapps@tceq.texas.gov>

Subject: STEERS Title V Application Submittal (New Application)

The TV-N application has been successfully submitted by Lauren Sanders. The submittal was received at 09/21/2023 11:17 AM.

The Reference number for this submittal is 592543

The confirmation number for this submittal is 490197.

The Area ID for this submittal is 4493.

The Project ID for this submittal is 35621.

The hash code for this submittal is

931268754E565C0D915C0938D974D9243A6E59F0EE19435DBF23DF3E2AEB6BAE.

You may access the original application submittal and the notice of final action documents from the COR Viewer which is available at https://ida.tceq.texas.gov/steersstaff/index.cfm? fuseaction=openadmin.submitlog&newsearch=yes.

If you have any questions, please contact the STEERS Help Line at 512-239-6925 or by e-mail at steers@tceq.texas.gov.



Initial Title V Permit Application

For:

Explorer Pipeline Company Fauna Station 6406 Uvalde Road Harris County Houston, Texas 77049

September 29, 2023

Prepared by:





Public Involvement Plan Form for Permit and Registration Applications

The Public Involvement Plan is intended to provide applicants and the agency with information about how public outreach will be accomplished for certain types of applications in certain geographical areas of the state. It is intended to apply to new activities; major changes at existing plants, facilities, and processes; and to activities which are likely to have significant interest from the public. This preliminary screening is designed to identify applications that will benefit from an initial assessment of the need for enhanced public outreach.

All applicable sections of this form should be completed and submitted with the permit or registration application. For instructions on how to complete this form, see TCEQ-20960-inst.

| Section 1. Preliminary Screening |
|--|
| New Permit or Registration Application New Activity - modification, registration, amendment, facility, etc. (see instructions) |
| If neither of the above boxes are checked, completion of the form is not required and does not need to be submitted. |
| Section 2. Secondary Screening |
| Requires public notice, |
| Considered to have significant public interest, <u>and</u> |
| Located within any of the following geographical locations: |
| Austin Dallas Fort Worth Houston San Antonio West Texas Texas Panhandle Along the Texas/Mexico Border Other geographical locations should be decided on a case-by-case basis |
| If all the above boxes are not checked, a Public Involvement Plan is not necessary. Stop after Section 2 and submit the form. |
| Public Involvement Plan not applicable to this application. Provide brief explanation. |

TCEQ-20960 (02-09-2023)

Storage Tank/Vessel Attributes Form OP-UA3 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels
(Including Petroleum Liquid Storage Vessels)
Texas Commission on Environmental Quality

| Date | Permit No. | Regulated Entity No. |
|-----------|-------------|----------------------|
| 9/29/2023 | TBD-Initial | RN100225432 |

| Unit ID No. | SOP/GOP Index No. | Product Stored | Storage Capacity | WW Tank Control | Maximum TVP | Storage Vessel Description | AMEL ID No. | Guidepole | Reid Vapor Pressure | Control Device ID No. |
|-------------|----------------------|-------------------|---------------------|--------------------|----------------|-------------------------------|----------------|-----------|------------------------|-----------------------------|
| T-2401 | 60Kb* | PTLQ-3 | A40K+ | EFR | | EFR-MT3 | | FLOAT | | |
| T-2402 | 60Kb* | PTLQ-3 | A40K+ | EFR | | EFR-MT3 | | FLOAT | | |
| T-2403 | 60Kb* | PTLQ-3 | A40K+ | EFR | | EFR-MT3 | | FLOAT | | |
| T-2404 | 60Kb* | PTLQ-3 | A40K+ | EFR | | EFR-MT3 | | FLOAT | | |
| T-2405 | 60Kb* | PTLQ-3 | A40K+ | EFR | | EFR-MT3 | | FLOAT | | |
| T-2406 | 60Kb* | PTLQ-3 | A40K+ | EFR | | EFR-MT3 | | FLOAT | | |
| T-2407 | 60Kb | PTLQ-3 | A40K+ | IFR | | IFR-MT | | NONE | | |
| T-2490 | 60Kb* | PTLQ-3 | A40K+ | IFR | | IFR-MT | | NONE | | |
| | | | | | | | | | | |

^{*}While Tanks T-2401 to T-2406 were constructed prior to July 23, 2984; the comply with NSPS Subpart Kb per §63.11087(f).

Water Separator Attributes Form OP-UA14 (Page 1)

Federal Operating Permit Program

Table 1: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115) Water Separation Texas Commission on Environmental Quality

| Date | Permit No.: | Regulated Entity No. |
|-----------|---------------|----------------------|
| 9/29/2023 | TBD - Initial | RN100225432 |

| Unit ID No. | SOP/GOP Index No. | Alternate Control Requirement (ACR) | ACR ID No. | Exemption | Emission Control Option | Control Device | Control Device ID No. |
|-------------|----------------------|---|------------|-----------|----------------------------|----------------|--------------------------|
| SEPARATOR | R5113-001 | No | N/A | None | ENCL | N/A | N/A |
| | | | | | | | |
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Texas Commission on Environmental Quality Miscellaneous Unit Attributes Form OP-UA1 (Page 1) Federal Operating Permit Program

| Date: | 09/28/2023 |
|-----------------------|-------------|
| Permit No.: | TBD-initial |
| Regulated Entity No.: | RN100225432 |

| Unit ID No. | SOP/GOP Index No. | Unit Type | Date Constructed/Placed in Service | Functionally Identical Replacement | Maximum Rated Capacity | Technical Information and Unit Description |
|--------------|-------------------|-----------|--|--|---------------------------|--|
| FUG | 63BBBBBB | EU | FCD+ | No | | Pumps, valves, etc. |
| AIR STRIPPER | | EU | FCD+ | No | | 10 gpm |
| MSS | R5115 | EU | FCD+ | No | | landing and degas |
| | | | | | | |
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Texas Commission on Environmental Quality Federal Operating Permit Program Individual Unit Summary Form OP-SUM Table 1

| Date | Permit No. | Regulated Entity No. |
|------------|--------------|----------------------|
| 09/29/2023 | TBD- Initial | RN100225432 |

| Unit/Process ID No. | Applicable Form | Unit Name/Description | CAM | Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106 | Preconstruction Authorizations Title I | Group ID No. |
|------------------------|--------------------|-------------------------------------|-----|--|---|--------------|
| T-2401 | OP-UA3 | Tank 2401 | | NSR-84138 | | GRP-TANKS |
| T-2402 | OP-UA3 | Tank 2402 | | NSR-84138 | | GRP-TANKS |
| T-2403 | OP-UA3 | Tank 2403 | | NSR-84138 | | GRP-TANKS |
| T-2404 | OP-UA3 | Tank 2404 | | NSR-84138 | | GRP-TANKS |
| T-2405 | OP-UA3 | Tank 2405 | | NSR-84138 | | GRP-TANKS |
| T-2406 | OP-UA3 | Tank 2406 | | NSR-84138 | | GRP-TANKS |
| T-2407 | OP-UA3 | Tank 2407 | | PBR §106.478 3/14/97[137284] | | GRP-TANKS |
| T-2490 | OP-UA3 | Tank 2490 | | PBR §106.478 3/14/97[137284] | | GRP-TANKS |
| FUG | OP-UA1 | Fugitive Components | | NSR-84138 | | GRP-FUG |
| SEPARATOR | OP-UA14 | Oil/Water Separator | | PBR §106.532 3/14/97[117263] | | GRP-WWT |
| AIR STRIPPER | OP-UA1 | Air Stripper | | PBR §106.532 3/14/97[117263] | | GRP-WWT |
| MSS | OP-UA1 | Maintenance Startup and Shutdown | | PBR §106.532 11/1/01[117263] | | GRP-MSS |

TCEQ 10007 (APDG 5837v9, Revised 05/20) OP-SUM This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Page _____ of ____

Applicable Requirements Summary Form OP-REQ3 (Page 1) Federal Operating Permit Program

Table 1a: Additions

| Date: 9/29/2023 | Regulated Entity No.: RN100225432 | Permit No.: TBD - Initial |
|---|--|---------------------------|
| Company Name: Explorer Pipeline Company | Area Name: Fauna Pipeline Breakout Station | |

| Revision No. | Unit/Group/Process ID No. | Unit/Group/Process Applicable Form | SOP/GOP Index No | Pollutant | Applicable Regulatory Requirement Name | Applicable Regulatory Requirement Standard(s) |
|--------------|---------------------------|---------------------------------------|---------------------|-----------|---|--|
| | GRP-TANKS | OP-UA3 | R5112 | VOC | 30 TAC Chapter 115, Storage of VOCs (Subchapter B) | Tanks shall not store VOC unless the required pressure is maintained, or they are equipped with the appropriate control device specified in Table I(a) or Table II(a) |
| | GRP-TANKS | OP-UA3 | 60Kb | VOCs | 40 CFR 60, Subpart Kb (VOC Storage Vessels) | Tanks shall be meet the requirements of §60.110b through §60.117b. |
| | GRP-TANKS | OP-UA3 | 63BBBBBB | HAPs | 40 CFR 63, Subpart BBBBBB (Area Source Gasoline MACT) | Tanks shall meet the requirements specified in §63.11087 |
| | GRP-FUG | OP-UA1 | 63BBBBBB | | 40 CFR 63, Subpart BBBBBB (Area Source Gasoline MACT) | Fugitive equipment subject to monthly sight, sound, smell leak detection per §63.11089 |
| | GRP-WWT | OP-UA14 | R5113-001 | VOC | 30 TAC Chapter 115, Water Separators (Subchapter B, Division 3) | Separator will be vapor tight except when sampling §115.132(a)(1) |
| | | | | | | |

Texas Commission on Environmental Quality Application Area-Wide Applicability Determinations and General Information Form OP-REQ1 Federal Operating Permit Program

| Date: | 09/29/2023 |
|-------------|---------------|
| Permit No.: | TBD - Initial |
| RN No.: | RN100225432 |

For SOP applications, answer ALL questions unless otherwise directed.

For GOP applications, answer ONLY these questions unless otherwise directed.

| Forn | n OP-l | REQ1: | Page 1 | | | |
|----------|---|-------|--|------|-------------|--|
| I. | . Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter | | | | | |
| | A. | Visib | Visible Emissions | | | |
| • | | 1. | The application area includes stationary vents constructed on or before January 31, 1972. | □YES | ⊠NO | |
| • | | 2. | The application area includes stationary vents constructed after January 31, 1972. If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6. If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4. | □YES | ⊠NO | |
| * | | 3. | The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972. | ☐YES | ⊠NO | |
| ♦ | | 4. | All stationary vents are addressed on a unit specific basis. | □YES | ⊠NO | |
| * | | 5. | Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area. | ☐YES | ⊠NO | |
| ♦ | | 6. | The application area includes structures subject to 30 TAC § 111.111(a)(7)(A). | □YES | ⊠NO | |
| ♦ | | 7. | The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A). | □YES | ⊠NO | |
| ♦ | | 8. | Emissions from units in the application area include contributions from uncombined water. | □YES | ⊠NO | |
| * | | 9. | The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c). | □YES | □NO 図N/A | |

Texas Commission on Environmental Quality Form OP-ACPS Application Compliance Plan and Schedule

| Date: 09/29/2023 | Regulated Entity No.: RN10022 | 25432 | Permit No.: TBD - Initial |
|-----------------------|-------------------------------|--|---------------------------|
| Company Name: Explore | er Pipeline Company | Area Name: Fauna Pipeline Breakout Station | |

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

Part 1

| A. | Compliance Plan — Future Activity Committal Statement | | | | |
|------------|--|------------|--|--|--|
| As thappli | The Responsible Official commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term. | | | | |
| B. | Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column) | | | | |
| 1. | With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application? | ĭ YES ☐ NO | | | |
| 2. | Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)? | ☐ YES ⊠ NO | | | |
| 3. | If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. (For reference only) | | | | |
| * | For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122. | | | | |
| | Compliance should be assessed based, at a minimum, on the required monitoring, testi keeping, and/or reporting requirements, as appropriate, associated with the applicable rquestion. | • | | | |

Federal Operating Permit Program Site Information Summary Form OP-1 (Page 1)

Texas Commission on Environmental Quality

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250or to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

| I. | Company Identifying Information |
|-------|---|
| A. | Company Name: Explorer Pipeline Company |
| В. | Customer Reference Number (CN): CN 600424584 |
| C. | Submittal Date (mm/dd/yyyy): 09/29/23 |
| II. | Site Information |
| A. | Site Name: Fauna Pipeline Breakout Station |
| В. | Regulated Entity Reference Number (RN): RN 100225432 |
| C. | Indicate affected state(s) required to review permit application: (Check the appropriate box[es].) |
| A | R CO KS LA NM OK N/A |
| D. | Indicate all pollutants for which the site is a major source based on the site's potential to emit: (Check the appropriate box[es].) |
| ×V | $OC \qquad \square \ NO_X \qquad \square \ SO_2 \qquad \square \ PM_{10} \qquad \square \ CO \qquad \square \ Pb \qquad \square \ HAPS$ |
| Other | r: |
| E. | Is the site a non-major source subject to the Federal Operating Permit Program? ☐ YES ☒ NO |
| F. | Is the site within a local program area jurisdiction? |
| G. | Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ YES ☒ NO |
| Н. | Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging: |
| III. | Permit Type |
| A. | Type of Permit Requested: (Select only one response) |
| X S | ite Operating Permit (SOP) |

Texas Commission on Environmental Quality

Title V New

FAUNA TANK FARM

Yes

Site Information (Regulated Entity)

What is the name of the permit area to be

authorized?

Does the site have a physical address?

Physical Address

Number and Street 6404 UVALDE RD

City HOUSTON

State TX ZIP 77049 **HARRIS** County Latitude (N) (##.#####) 29.816346 Longitude (W) (-###.#####) -95.179576

Primary SIC Code Secondary SIC Code

Primary NAICS Code 486910

Secondary NAICS Code

Regulated Entity Site Information

What is the Regulated Entity's Number (RN)? RN100225432

What is the name of the Regulated Entity (RE)? **FAUNA TANK FARM**

Does the RE site have a physical address? Yes

Physical Address

Number and Street 6404 UVALDE RD

HOUSTON City

State TX ZIP 77049 **HARRIS** County Latitude (N) (##.#####) 29.816346 Longitude (W) (-###.#####) -95.179576 486910 Facility NAICS Code

What is the primary business of this entity? REFINED PRODUCT PETROLEUM PIPELINE

Corporation

Customer (Applicant) Information

How is this applicant associated with this site? Owner Operator CN600424584 What is the applicant's Customer Number

(CN)?

Type of Customer

Full legal name of the applicant:

Legal Name **Explorer Pipeline Company**

3018106 Texas SOS Filing Number Federal Tax ID 730758982

State Franchise Tax ID 17307859821 State Sales Tax ID

Local Tax ID