

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Tuesday, October 21, 2025 8:52 AM
To: Alfredo Mendoza
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Alfredo,

Thank you for taking care of this so quickly. I have no comments on the revised draft permit. I would like to remain the technical contact for this consolidated submittal. Please let me know if you need anything else.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Monday, October 20, 2025 4:33 PM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: [WARNING: UNSCANNABLE EXTRACTION FAILED]Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

I have updated the draft permit for the Grey Wolf Gas Plant to incorporate AMOC 218 for the OGI LDAR monitoring approved for the Standard Permit registration as requested in the minor revision application submitted on September 16, 2025 in STEERS. The only changes to the last draft permit that was sent was to add Special Term and Condition 15 that refers to the TCEQ approved AMOC and the incorporation of the AMOC 218 letter in the permit attachments beginning on page 42. Please review the draft permit and let me know if you have any comments by **October 22, 2025**. If you approve the revised draft permit, I will send the project forward for the start of the public announcement/EPA review period.

One other question I have for this project is the technical contact. You are listed as the technical contact for the minor revision project 37118, however the copy of record (COR) for the STEERS submittal for the most recent minor revision for this permit (project 39019) has Aleno Miro listed as the technical contact. We generally prefer new technical contacts to be listed on an updated OP-1 since STEERS does not communicate with our Title V permit database. Should Aleno Miro be the new technical contact or do you want to remain the technical contact for this permit? Project 39019 for adding the AMOC is being consolidated into the existing project 37118 as you requested earlier.

If you have any questions, please let me know.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division

Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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From: Alfredo Mendoza
Sent: Monday, October 20, 2025 4:33 PM
To: Garcia, Lisa M
Subject: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447
Attachments: SOP - O4447 ET Gathering & Processing LLC (Minor, 37118) Draft.docx

Lisa,

I have updated the draft permit for the Grey Wolf Gas Plant to incorporate AMOC 218 for the OGI LDAR monitoring approved for the Standard Permit registration as requested in the minor revision application submitted on September 16, 2025 in STEERS. The only changes to the last draft permit that was sent was to add Special Term and Condition 15 that refers to the TCEQ approved AMOC and the incorporation of the AMOC 218 letter in the permit attachments beginning on page 42. Please review the draft permit and let me know if you have any comments by **October 22, 2025**. If you approve the revised draft permit, I will send the project forward for the start of the public announcement/EPA review period.

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FEDERAL OPERATING PERMIT

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

AUTHORIZING THE OPERATION OF
Grey Wolf Gas Plant
Natural Gas Extraction

LOCATED AT
Winkler County, Texas
Latitude 31° 47' 42" Longitude 103° 15' 31"
Regulated Entity Number: RN111436614

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

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

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

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

Permit No: 04447 Issuance Date: February 13, 2024

For the Commission

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General Terms and Conditions

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

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

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

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

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

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
 - E. Emission units subject to 40 CFR Part 63, Subparts HH and ZZZZ, as identified in the attached Applicable Requirements Summary table, are subject to 30 TAC Chapter 113,

Subchapter C, §113.390 and §113.1090, respectively, which incorporates the 40 CFR Part 63 Subpart by reference.

2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
 - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
 - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that

does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

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

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

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

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

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

- (4) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
 - C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
 - D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
 - E. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
 - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (iii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (iv) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)
4. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:

- A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
 - B. Title 40 CFR § 60.8 (relating to Performance Tests)
 - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
 - D. Title 40 CFR § 60.12 (relating to Circumvention)
 - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
 - F. Title 40 CFR § 60.14 (relating to Modification)
 - G. Title 40 CFR § 60.15 (relating to Reconstruction)
 - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
 - 6. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
 - A. Title 40 CFR § 63.760(c) (relating to Applicability and Designation of Affected Source)

Additional Monitoring Requirements

- 7. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached "CAM Summary" upon issuance of the permit. In addition, the permit holder shall comply with the following:
 - A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
 - B. The permit holder shall report, consistent with the averaging time identified in the "CAM Summary," deviations as defined by the deviation limit in the "CAM Summary." Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
 - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "CAM Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
 - D. The permit holder shall operate the monitoring, identified in the attached "CAM Summary," in accordance with the provisions of 40 CFR § 64.7.

- E. The permit holder shall comply with either of the following requirements for any capture system associated with the VOC control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions:
 - (i) Once a year the permit holder shall inspect the capture system in compliance of CAM for leaks in accordance with 40 CFR Part 60, Appendix A, Test Method 21. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppm above background or as defined by the underlying applicable requirement; or
 - (ii) Once a month, the permit holder shall conduct a visual, audible, and/or olfactory inspection of the capture system in compliance of CAM to detect leaking components.
- F. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to detect leaking components for any capture system associated with the control device subject to CAM. If the results of the inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions.
- G. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

New Source Review Authorization Requirements

- 8. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated January 7, 2025 in the application for project 37118), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
- 9. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 10. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating

noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

11. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
 - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
 - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
 - C. Applicable requirements of 30 TAC § 116.620 for Installation and/or Modification of Oil and Gas Facilities based on the information contained in the registration application.

Compliance Requirements

12. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
13. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Protection of Stratospheric Ozone

14. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
 - A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

Alternative Requirements

15. The permit holder shall comply with the approved alternative means of control (AMOC); alternative monitoring, recordkeeping, or reporting requirements; or requirements determined to be equivalent to an otherwise applicable requirement contained in the Alternative Requirements attachment of this permit. Units complying with an approved alternative requirement have reference to the approval in the Applicable Requirements summary listing for the unit. The permit holder shall maintain the original documentation, from the TCEQ Executive Director, demonstrating the method or limitation utilized. Documentation shall be maintained and made available in accordance with 30 TAC § 122.144.

Permit Location

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

Permit Shield (30 TAC § 122.148)

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

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary	12
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Applicable Requirements Summary	14
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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
COMP-4	Fugitive Emission Units	N/A	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
DEHY	Glycol Dehydration	N/A	168018	30 TAC Chapter 116, Standard Permits	No changing attributes.
DEHY	Glycol Dehydration	N/A	63HH	40 CFR Part 63, Subpart HH	No changing attributes.
FLARE1	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FLARE1	Flares	N/A	60A	40 CFR Part 60, Subpart A	No changing attributes.
FLARE2	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FLARE3	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FUG	Fugitive Emission Units	N/A	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
GRP-COMP	Fugitive Emission Units	COMP-1, COMP-2, COMP-3, COMPVRU-1, COMPVRU-2	600000a	40 CFR Part 60, Subpart 0000a	No changing attributes.
GRP-COND	Storage Tanks/Vessels	T-2, T-3, T-4, T-5	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	168018	30 TAC Chapter 116, Standard Permits	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	60JJJJ	40 CFR Part 60, Subpart JJJJ	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	63ZZZZ	40 CFR Part 63, Subpart ZZZZ	No changing attributes.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
HMO-HTR	Boilers/Steam Generators/Steam Generating Units	N/A	60Dc-01	40 CFR Part 60, Subpart Dc	No changing attributes.
HMO-HTR2	Boilers/Steam Generators/Steam Generating Units	N/A	60Dc-02	40 CFR Part 60, Subpart Dc	No changing attributes.
LOAD2	Miscellaneous Units	N/A	N/A	30 TAC Chapter 116, Standard Permits	No changing attributes.
PRO-AMINE	Gas Sweetening/Sulfur Recovery Units	N/A	168018	30 TAC Chapter 116, Standard Permits	No changing attributes.
PRO-AMINE	Gas Sweetening/Sulfur Recovery Units	N/A	60OOOOa-0002	40 CFR Part 60, Subpart OOOOa	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
COMP-4	EU	60000Ob	§111 Pollutant	40 CFR Part 60, Subpart 000Ob	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 000Ob
DEHY	EU	168018	112(B) HAPS	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018
DEHY	EU	168018	VOC	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018
DEHY	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.764(e)(1)(ii) § 63.764(a) § 63.764(e)(1) § 63.764(j) § 63.775(c)(8)	The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.	[G]§ 63.772(b)(2)	§ 63.774(d)(1) § 63.774(d)(1)(ii)	None
FLARE1	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
FLARE1	CD	60A	Opacity	40 CFR Part 60, Subpart A	§ 60.18(b) § 60.18(c)(1) § 60.18(c)(2) § 60.18(c)(3)(ii) § 60.18(c)(5) § 60.18(c)(6) § 60.18(e)	Flares shall comply with paragraphs (c)-(f) of § 60.18.	§ 60.18(d) § 60.18(f)(1) § 60.18(f)(2) § 60.18(f)(3) § 60.18(f)(6)	None	None
FLARE2	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FLARE3	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FUG	EU	60000Ob	§111 Pollutant	40 CFR Part 60, Subpart 000Ob	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 000Ob

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-COMP	EU	600000a	VOC	40 CFR Part 60, Subpart OOOOa	§ 60.5385a(a)(2) § 60.5370a(a) § 60.5370a(b) § 60.5385a § 60.5385a(a) § 60.5385a(b) § 60.5385a(c) § 60.5385a(d) § 60.5410a § 60.5415a(c) § 60.5415a(c)(2) § 60.5415a(c)(3)	For each reciprocating compressor you must replace the rod packing prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.	§ 60.5410a(c)(1) § 60.5415a(c)(1)	§ 60.5410a(c)(4) § 60.5420a(c) [G]§ 60.5420a(c)(3)	§ 60.5410a(c)(3) § 60.5420a(a) § 60.5420a(a)(1) § 60.5420a(b) [G]§ 60.5420a(b)(1) § 60.5420a(b)(11) [G]§ 60.5420a(b)(13) [G]§ 60.5420a(b)(14) [G]§ 60.5420a(b)(4)
GRP-COND	EU	600000b	§111 Pollutant	40 CFR Part 60, Subpart OOOOb	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart OOOOb
GRP-ENG	EU	168018	CO	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018
GRP-ENG	EU	168018	Formaldehyde	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-ENG	EU	60JJJJ	CO	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(e)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)
GRP-ENG	EU	60JJJJ	NO _x	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NO _x emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(d)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)
GRP-ENG	EU	60JJJJ	VOC	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(f) § 60.4244(g)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-ENG	EU	63ZZZZ	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
HMO-HTR	EU	60Dc-01	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR	EU	60Dc-01	PM (Opacity)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR	EU	60Dc-01	SO ₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
HMO-HTR2	EU	60Dc-02	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	PM (Opacity)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	SO ₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
LOAD2	EU	168018	VOC	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	PRO	168018	112(B) HAPS	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	PRO	168018	VOC	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
PRO-AMINE	EU	600000a-0002	SO ₂	40 CFR Part 60, Subpart 0000a	§ 60.5365a(g)(3) § 60.5370a(b)	Owners or operators of facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H ₂ S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423a(c), but are not required to comply with §§60.5405a through 60.5407a and §§60.5410a(g) and 60.5415a(g).	None	§ 60.5423a(c)	§ 60.5420a(a) § 60.5420a(a)(1)

Additional Monitoring Requirements

Compliance Assurance Monitoring Summary 22

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: CO	Main Standard: 168018
Monitoring Information	
Indicator: CO Concentration	
Minimum Frequency: Every 15,000 hours of operation	
Averaging Period: N/A	
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO	
CAM Text: Use Reference Method 10 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A-100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: CO	Main Standard: 168018
Monitoring Information	
Indicator: Inlet flue gas temperature	
Minimum Frequency: N/A	
Averaging Period: Once per day	
Deviation Limit: Minimum inlet flue gas temperature shall not be below 550 degrees F. Maximum inlet flue gas temperature shall not exceed 1250 degrees F.	
CAM Text: The monitoring device should be installed to record the inlet flue gas temperature to the catalyst. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 2% of reading; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: Formaldehyde	Main Standard: 168018
Monitoring Information	
Indicator: CO concentration (as a surrogate for CH ₂ O)	
Minimum Frequency: Every 15,000 hours of operation	
Averaging Period: N/A	
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO (as a surrogate for CH ₂ O)	
CAM Text: Use Reference Method 10 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A-100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: Formaldehyde	Main Standard: 168018
Monitoring Information	
Indicator: Inlet flue gas temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Minimum inlet flue gas temperature shall not be below 550 degrees F. Maximum inlet flue gas temperature shall not exceed 1250 degrees F.	
CAM Text: The monitoring device should be installed to record the inlet flue gas temperature to the catalyst. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 2% of reading; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: LOAD2	
Control Device ID No.: FLARE3	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

Permit Shield

Permit Shield 36

Permit Shield

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

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
FLARE1	N/A	40 CFR Part 60, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Parts 60 and 61.
FLARE1	N/A	40 CFR Part 63, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Part 63.
FLARE3	N/A	40 CFR Part 60, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Parts 60 and 61.
FLARE3	N/A	40 CFR Part 63, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Part 63.
GRP-COND	T-2, T-3, T-4, T-5	40 CFR Part 60, Subpart Kb	Storage vessel design capacity less than or equal to 1,589.874 m ³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.
GRP-COND	T-2, T-3, T-4, T-5	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.
GRP-MISC	TK-AF1, TK-AF2, TK-AM, TK-GL, TK-LO1, TK-LO2, TK-ML1, TK-ML2	40 CFR Part 60, Subpart Kb	Storage vessel capacity less than 75 m ³ .
GRP-MISC	TK-AF1, TK-AF2, TK-AM, TK-GL, TK-LO1, TK-LO2, TK-ML1, TK-ML2	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.
PRO-AMINE	N/A	30 TAC Chapter 112, Sulfur Compounds	Gas sweetening unit does not use sulfur recovery.
T-1	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity greater than or equal to 75 m ³ but less than 151 m ³ storing a liquid with a maximum TVP less than 15.0 kPa.
T-1	N/A	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.

New Source Review Authorization References

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New Source Review Authorization References

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

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 168018	Issuance Date: 03/05/2025
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.359	Version No./Date: 09/10/2013

New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
C-1	Residue Compressor Engine 1	168018
C-2	Residue Compressor Engine 2	168018
C-3	Residue Compressor Engine 3	168018
C-4	Residue Compressor Engine	168018
COMP-1	Reciprocating Residue Compressor 1	168018
COMP-2	Reciprocating Residue Compressor 2	168018
COMP-3	Reciprocating Residue Compressor 3	168018
COMP-4	Reciprocating Residue Compressor	168018
COMPVRU-1	Reciprocating VRU Compressor 1	168018
COMPVRU-2	Reciprocating VRU Compressor 2	168018
DEHY	TEG Dehydration Unit	168018
FLARE1	Plant Flare	168018, 106.359/09/10/2013
FLARE2	Acid Gas Flare	168018
FLARE3	Truck Loading Flare	168018
FUG	Site Fugitives	168018
HMO-HTR	Hot Oil System Heater 1	168018
HMO-HTR2	Hot Oil System Heater 2	168018
LOAD2	Truck Loading Stabilized Condensate	168018
PRO-AMINE	Amine Sweetening Unit	168018
T-1	Slop Oil Tank	168018
T-2	Stabilized Condensate Tank 1	168018, 106.359/09/10/2013

New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
T-3	Stabilized Condensate Tank 2	168018, 106.359/09/10/2013
T-4	Stabilized Condensate Tank 3	168018, 106.359/09/10/2013
T-5	Stabilized Condensate Tank 4	168018, 106.359/09/10/2013
TK-AF1	Antifreeze Tank	168018
TK-AF2	Antifreeze Tank	168018
TK-AM	Amine Tank	168018
TK-GL	Glycol Tank	168018
TK-LO1	Lube Oil Tank	168018
TK-LO2	Lube Oil Tank	168018
TK-ML1	Methanol Tank	168018
TK-ML2	Methanol Tank	168018

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

Alternative Requirement

Alternative Requirement..... 42

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2025

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

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

Dear Mr. Clark:

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

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

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

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

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

September 5, 2025
Page 2
MR TOBY CLARK

Re: AMOC 218

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

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

Sincerely,



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

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

Project Number: 351877

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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

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

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

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

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

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

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

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

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

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

A. General Requirements and Applicability.

1. The following are applicable to this condition:
 - i. All process unit equipment fugitive components at an onshore natural gas processing plant including each pump, pressure relief device, open-ended valve or line, valve, and flange or other connector that has the potential to emit methane or VOC and any device or system required by this condition.
 - ii. "No detectable emissions" or a "leak" is defined by ≥ 500 ppmv using a FID-based or catalytic combustion-based instrument for valves and connectors and $\geq 2,000$ ppmv for pumps following the requirements in 40 CFR 60, Appendix A-7, Method 21 (Method 21). The instrument shall be calibrated before use each day of use by the procedures specified and using zero air and a mixture of methane or n-hexane and air at a concentration no more than 2,000 ppmv.
 - iii. Alternatively, a "leak" is defined as any emissions observed using an optical gas imaging (OGI) camera. Any OGI monitoring must follow 40 CFR 60, Appendix K "Determination of Volatile Organic Compound and Greenhouse Gas Leaks Using Optical Gas Imaging".
 - iv. Equipment is in light liquid service when all the following conditions apply based on representative samples of the process fluid that is contained in or contacts the equipment, or gas being combusted in a flare. Standard reference texts or ASTM D2879-83, -96, or -97 shall be used to determine vapor pressures.
 - a. The vapor pressure of one or more of the organic components is greater than 0.3 kPa at 20 °C (1.2 in H₂O at 68 °F);
 - b. The total concentration of the pure organic components having a vapor pressure greater than 0.3 kPa at 20 °C (1.2 in H₂O at 68 °F) is equal to or greater than 20 percent by weight;
 - c. The fluid is a liquid at operating conditions; or
 - d. If the weight percent evaporated is greater than 10 percent at 150 degrees Celsius (302 degrees Fahrenheit) as determined by ASTM D86-96.
 - v. Each piece of equipment or component is presumed to have the potential to emit methane or VOC unless an owner or operator demonstrates otherwise. For a piece of equipment to be considered not to have the potential to emit methane or VOC, the methane and VOC content of a gaseous stream must be below detection limits using Method 18 of 40 CFR 60 Appendix A-6. Alternatively, if the piece of equipment is in wet gas service, methane and VOC content of the stream may be determined by being below the detection limit of the methods described in ASTM E168-16(R2023), E169-16(R2022), or E260-96.
2. The following are exempt from this condition:
 - i. Pumps in light liquid service, pressure relief devices in gas/vapor service, valves in gas/vapor and light liquid service, and connectors in gas/vapor service and in light liquid service that are located at a non-fractionating plant with a design capacity less than 10 million standard cubic feet per day (10 MMscfd) of field gas are exempt from:
 - a. Bi-monthly OGI monitoring requirements as required under paragraph (B)(1)(i) of this condition; or

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

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

B. Operational And Emissions Limits.

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

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

- ii. Is demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background as determined by Method 21 initially upon designation, annually, and at other times requested by the Administrator.
- g. Any pump that is designated as an UTM pump is exempt.
- iii. For each pressure relief device (PRD) in gas/vapor service, comply with the following:
 - a. Monitor each pressure relief device quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater above background.
 - b. In addition, after each pressure release, monitor each pressure relief device within 5 calendar days to detect leaks using or Method 21 unless the device is located in a non-fractionating plant that is monitored only by non-plant personnel which may be monitored after a pressure release the next time the monitoring personnel are onsite or within 30 calendar days after a pressure release, whichever is sooner. No pressure relief device may be allowed to operate for more than 30 calendar days after a pressure release without monitoring.
 - c. Any pressure relief device that is routed to a process or fuel gas system or equipped with a CVS to a control device must comply with the applicable requirements of this condition.
 - d. Pressure relief devices equipped with a rupture disk are exempt from fugitive monitoring requirements provided a new rupture disk is installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in the delay of repair criteria in paragraph (C).
- iv. Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve, except as provided in (d) or (e) of this paragraph. The cap, blind flange, plug, or second valve must seal the open end of the valve or line at all times except during operations requiring process fluid flow through the open-ended valve or line.
 - a. If evidence of a leak is found at any time by AVO, or any other detection method, a leak is detected and must be repaired in accordance with this condition. A leak is defined as an instrument reading of 500 ppmv or greater if Method 21 of appendix A-7 to this part is used.
 - b. Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
 - c. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall remain closed at all other times.
 - d. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of this paragraph.
 - e. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block-and-bleed system are exempt from the requirements of this section.
- v. Each valve in gas/vapor or light liquid service must be monitored quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater. A valve that begins operation in gas/vapor service or in light liquid service after the initial startup date for the process unit must be monitored for the first time within 90 days after the end of its startup period to ensure proper installation, except for a valve that replaces a leaking valve, or is designated as UTM, DTM, or no detectable emissions.
- vi. For each pump, valve, and connector in heavy liquid service and pressure relief device in light liquid or heavy liquid service, if evidence of a potential leak is found at any time by AVO, or any other detection method, comply with one of the following:
 - a. Monitor the equipment within 5 calendar days by OGI or Method 21 and repair any leaks detected according to paragraph C of this condition. An instrument reading of 10,000 ppmv or greater is defined as a leak.
 - b. Designate the AVO, or other indication of a leak, as a leak and repair the leak according to paragraph C of this condition.

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

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

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

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

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

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

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

D. Initial Compliance

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

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

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

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

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

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

Appendix A

Acronym List 56

Acronym List

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

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
RO	Responsible Official
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, October 3, 2025 9:06 AM
To: Alfredo Mendoza
Subject: Re: Technical Review -Grey Wolf Gas Plant, permit O4447/project 37118

We would like to combine the two applications. Thank you for that option. I apologize for the confusion with the two applications. I was not aware that another application was in progress.

Thank you.

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From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Wednesday, October 1, 2025 2:48:31 PM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: Technical Review -Grey Wolf Gas Plant, permit O4447/project 37118

Lisa,

My supervisor has approved sending the minor revision for the Grey Wolf Gas Plant to public announcement, however he noticed that another minor revision application was submitted on September 16, 2025 for this permit which has been assigned project number 39019. I was not aware of this project as it has not been assigned to me. My supervisor wants me to check with you to see if ET Gathering & Processing LLC wishes to combine the newly submitted revision application with the previous one or if you wish to keep these projects separate.

I haven't looked at the most recent application, however my supervisor said the changes are not extensive. If you wish to combine the projects, I will send a new draft permit for review that incorporates the changes from both projects before I send it to public announcement. If you wish to keep them separate, then I will send the current project 37118 out to public notice and EPA review and I will won't review the second project until the first project is issued which would probably be end of November or early December.

Please let me know your decision on combining the minor revision applications by **October 3, 2025**.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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From: Alfredo Mendoza
Sent: Wednesday, October 1, 2025 3:49 PM
To: 'lisa.garcia@energytransfer.com'
Subject: Technical Review -Grey Wolf Gas Plant, permit O4447/project 37118

Lisa,

My supervisor has approved sending the minor revision for the Grey Wolf Gas Plant to public announcement, however he noticed that another minor revision application was submitted on September 16, 2025 for this permit which has been assigned project number 39019. I was not aware of this project as it has not been assigned to me. My supervisor wants me to check with you to see if ET Gathering & Processing LLC wishes to combine the newly submitted revision application with the previous one or if you wish to keep these projects separate.

I haven't looked at the most recent application, however my supervisor said the changes are not extensive. If you wish to combine the projects, I will send a new draft permit for review that incorporates the changes from both projects before I send it to public announcement. If you wish to keep them separate, then I will send the current project 37118 out to public notice and EPA review and I will won't review the second project until the first project is issued which would probably be end of November or early December.

Please let me know your decision on combining the minor revision applications by **October 3, 2025**.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division
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ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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**Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program**

Date:	9/15/2025
Permit No.:	O4447
Regulated Entity No.:	RN111436614

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	600000Ob-0001	EU				Fugitive monitoring requirements associated with NSPS 0000b for which a unit attribute form and applicability flowchart has not yet been created. All applicable citations are included on Form OP-REQ3.

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

Table 1

Date	Permit No.	Regulated Entity No.
9/15/2025	O4447	RN111436614

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	FUG	OP-UA1	Site Fugitives		168018	
	2	FUG	OP-UA1	Site Fugitives		168018	



Texas Commission on Environmental Quality
Form OP-REQ3 - Instructions
Applicable Requirements Summary

General:

The purpose of Form OP-REQ3 is to allow documentation of the applicability of, or exemption from, requirements for units, groups, and processes and to designate monitoring, recordkeeping, reporting, and testing (MRRT) required for each applicable requirement line (emission limit, standard, equipment specifications, exemption, etc.). The applicant will list units that have at least one applicable requirement. For additional information relating to applicable requirements, please go to the TCEQ web site at

www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

Table 1a: Additions

Table 1b: Additions

Table 2a: Deletions

Table 2b: Deletions

Note: Complete Tables 1a and 1b for initial permit issuance or as part of the permit revision process to identify any new requirements.

Note: Complete Tables 2a and 2b for the permit revision process to remove requirements that no longer apply.

Note: If there is only a change to MRRT requirements during a permit revision or update to a permit application, to expedite the process, the change only needs to be reflected on Tables 1b and/or 2b. Tables 1a and/or 2a need not be submitted. Likewise, if there is only a change to a standard during a permit revision or update to a permit application, the change only needs to be reflected on Tables 1a and/or 2a. Tables 1b and/or 2b need not be submitted.

Note: Complete this form for general operating permit (GOP) revisions to establish provisional requirements for authorization to operate when the underlying GOP does not contain the correct citations.

The Company Name and Area Name (from Form OP-1, Section I and X, respectively) must appear in the header block of each page for purposes of identification. The date of submittal must also be included, and should be consistent throughout the application (MM/DD/YYYY). Any subsequent submittals must show the date of revision. Also, enter the Regulated Entity Number (RNXXXXXXXX) and Permit Number (OXXXX), if assigned.

Specific:

Table 1a: Additions and Table 2a: Deletions

Revision No.: Only complete this section for the permit revision process. Enter the revision number identified on Form OP-2 (Application for Permit Revision). This number will link the specific set of applicable requirements to the appropriate permit revision. Please refer to the TCEQ guidance document (Site Operating Permit (SOP) Revision Application Guidance) for additional information regarding the permit revision process.

Unit/Group/Process

ID No.: Enter the identification number (ID No.) for the unit, group, or process (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

Applicable Form: Enter the number of the Unit Attribute (UA) form which contains the specific information for the corresponding emission unit, emission point, or process (i.e., for flares enter “OP-UA7”). The Applicable Form entered on OP-REQ3 must match the applicable form entered on OP-SUM for the emission unit, emission point, or process.

SOP/GOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please go to the TCEQ web site at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

General operating permit (GOP) applicants should indicate which provisional requirements are being established if there are no GOP index numbers for the requirements (or checklists for MSW landfill or ACI incinerator).

Pollutant: Select one of the following options for the pollutant that is the subject of the applicable requirement. Enter the code on the form.

For criteria pollutants:

Code	Description
CO	Carbon monoxide
NOX	Nitrogen oxides (NO _x)
VOC	Volatile organic compounds
SO ₂	Sulfur dioxide
PB	Lead
PM	Particulate matter <i>(use this code for any regulatory requirement under any Title 40 Code of Federal Regulations Part 60 [40 CFR Part 60] subpart section or Title 30 Texas Administrative Code Chapter 111 [30 TAC Chapter 111] section where the standard, as designated by the TCEQ Requirements Reference Tables (RRT) and flowchart, is for particulate matter)</i>
PM (OPACITY)	Opacity of particulate matter
HAPS	Hazardous air pollutants (HAPs)

Note: In some rules, there may be requirements for two different pollutants in a single citation. When this occurs, enter the complete citation for the first pollutant, then again on the next line for the second pollutant. Repeat the unit, group, or process identification number on each line. For example; 30 TAC Chapter 117 has several emission limit paragraphs addressing NO_x and CO, or anhydrous ammonia (NH₃). For this example, enter the applicable requirement twice, once for NO_x and once for CO or NH₃.

Applicable Regulatory Requirement

Name: Enter the name of the requirement for which positive applicability is being demonstrated. See examples in the table below (maximum 25 characters).

Standard(s): Enter the citation of the applicable standard(s) of the rule. The RRT and flowcharts may be used to assist with applicability determinations. Multiple lines may be necessary to list all applicable portions of a given rule or requirement (maximum 36 characters).

If the requirement has a future effective date, list the effective date on the form after the citation.

Note: Site-wide requirements should not be listed on Form OP-REQ3. Please refer to the TCEQ guidance documents under “Air Site Operating Permit Guidance (Title V)” for additional information relating to site-wide requirements.

Note: To Title IV acid rain sources; standard(s) for acid rain rules (Title 40 Code of Federal Regulations Parts 72-76 [40 CFR Parts 72-76]) are not required on Form OP-REQ3.

EXAMPLE APPLICABLE REGULATORY REQUIREMENTS*		
Regulation	Name (Input Format)	Standard(s) (Input Format)
30 TAC Chapters 111, 112, 113, 115, 117	Chapter 111	§111.XXX(x)(yy)(zz)
	Chapter 112	§112.XXX(x)(yy)(zz)
	Chapter 113	§113.XXX(x)(yy)(zz)
	Chapter 115	§115.XXX(x)(yy)(zz)
	Chapter 117	§117.XXX(x)(yy)(zz)
40 CFR Part 60, Subparts A-WWW, New Source Performance Standards (NSPS)**	NSPS XXX	§60.XXX(x)(yy)(zz)
40 CFR Part 61, Subparts A-FF National Emission Standards for Hazardous Air Pollutants (NESHAP)	NESHAP XX	§61.XX(x)(yy)(zz)
40 CFR Part 63, Subparts A-XXXXXX, NESHAP by source category, including hazardous organic NESHAP (HON)	MACT XX	§63.XXX(x)(yy)(zz)

* This list is not intended to be exhaustive

** The inclusion of 40 CFR Part 60, Subpart A is only for those requirements contained in 40 CFR § 60.18

When using the RRT and flowchart to complete Form OP-REQ3, citations for standards and MRRT may be grouped to the level at which everything underneath the citation applies. A grouped citation will be shown in the RRT with a bolded notation **[GD]** or **[GR]** before the citation, with no space in between.

For example, 40 CFR § 63.468(a) states, “Each owner or operator of an existing solvent cleaning machine shall submit an initial notification no later than 8/29/95. This report shall include the information specified in paragraphs (a)(1) through (a)(6) of this section.” The reporting column on the RRT will then show “**[GD]** § 63.468(a).”

When entering a citation on Form OP-REQ3 that is shown in the RRT with a bolded notation **[GD]** or **[GR]** before the citation, remove the “D” or “R” from the brackets and show the citation as grouped using the unbolded notation [G]. The reporting citation from the previous example would then be shown as “[G] § 63.468(a)” in the Form OP-REQ3 reporting column.

Table 1b: Additions and Table 2b: Deletions

Revision No.: Only complete this section for the permit revision process. Enter the revision number identified on Form OP-2 (Application for Permit Revision). This number will link the specific set of applicable requirements to the appropriate permit revision. Please refer to the TCEQ guidance document entitled “Site Operating Permit (SOP) Revision Application Guidance” for additional information regarding the permit revision process.

Unit/Group/Process

ID No.: Enter the identification number (ID No.) for the unit, group, or process (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP/GOP Index No.: Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please go to the TCEQ web site at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

General operating permit (GOP) applicants should indicate which provisional requirements are being established if there are no GOP index numbers for the requirements (or checklists for MSW landfill or ACI incinerator).

Pollutant: Select one of the following options for the pollutant that is the subject of the applicable requirement. Enter the code or pollutant name on the form.

For criteria pollutants:

Code	Description
CO	Carbon monoxide
NOX	Nitrogen oxides (NO _x)
VOC	Volatile organic compounds
SO ₂	Sulfur dioxide
PB	Lead
PM	Particulate matter <i>(use this code for any regulatory requirement under any 40 CFR Part 60 subpart sections or 30 TAC Chapter 111 sections where the standard, as designated by the RRT and flowchart, is for particulate matter)</i>
PM (OPACITY)	Opacity of particulate matter
HAPS	Hazardous air pollutants (HAPs)

Monitoring and Testing Requirements: Enter the citation of the rule requiring monitoring of the relevant unit against the applicable requirement and/or testing in conjunction with the control standard, emission limit, operations of control equipment, or monitoring equipment of this requirement (maximum 36 characters). Use multiple lines if necessary.

Recordkeeping Requirements: Enter the citation of the rule requiring recordkeeping of the relevant unit against the applicable requirement (maximum 36 characters). Use multiple lines if necessary.

Reporting Requirements: Enter the citation of the rule requiring reporting of the relevant unit against the applicable requirement (maximum 36 characters). Use multiple lines if necessary.

Note: Please refer to the "Standards" section of these instructions for information relating to grouping of monitoring, testing, recordkeeping, and reporting citations.

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

Table 1a: Additions

Date: 9/15/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

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)
2	FUG	OP-UA1	600000b-0001	VOC	40 CFR Part 60, Subpart OOOOb	§60.5370b(a)(4) §60.5370b(b) §60.5400b(a) §60.5400b(b) §60.5400b(c) §60.5400b(d) §60.5400b(e) §60.5400b(f) §60.5400b(g) §60.5400b(h) §60.5400b(i) §60.5400b(j) §60.5410b(h) §60.5411b(a)(2) §60.5411b(a)(3) §60.5411b(a)(4) §60.5411b(c) §60.5412b(a)(3) §60.5412b(b) §60.5415b(f)(1)(i) §60.5415b(f)(1)(ii) §60.5415b(f)(1)(iii) §60.5415b(f)(1)(iv)

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)
						§60.5415b(f)(1)(v) §60.5415b(f)(1)(vi) §60.5415b(f)(1)(vii)(A) §60.5415b(f)(1)(vii)(B) §60.5415b(f)(1)(x) §60.5415b(j)

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: 9/15/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	FUG	600000b-0001	VOC	§60.5400b(b) §60.5400b(c) §60.5400b(d) §60.5400b(e) §60.5400b(g) §60.5400b(h) §60.5410b(h)(1) §60.5410b(h)(2) §60.5410b(h)(3) §60.5410b(h)(4) §60.5410b(h)(5) §60.5410b(h)(6) §60.5410b(h)(7) §60.5410b(h)(8) §60.5410b(h)(9) §60.5410b(h)(10) §60.5410b(h)(12) §60.5415b(f)(1)(x) §60.5415b(j)(1) §60.5415b(j)(2)	§60.5400b(l) §60.5410b(h)(11)(vi) §60.5410b(h)(15) §60.5411b(c) §60.5415b(j)(15) §60.5416b(b)(9) §60.5420b(c)(8)(i) §60.5420b(c)(8)(ii) §60.5420b(c)(8)(iii) §60.5420b(c)(8)(iv) §60.5420b(c)(10) §60.5420b(c)(11)(ii) §60.5420b(c)(11)(iv) §60.5420b(c)(11)(v) §60.5420b(c)(11)(vi) §60.5420b(c)(11)(vii) §60.5420b(c)(12) §60.5420b(c)(13) §60.5421b(a)	§60.7(a)(1) §60.7(a)(3) §60.7(a)(4) §60.15(d) §60.5400b(k) §60.5410b(h)(13) §60.5410b(h)(14) §60.5415b(j)(14) §60.5417b(j) §60.5420b(a)(1) §60.5420b(b)(1) §60.5420b(b)(11)(i) §60.5420b(b)(11)(ii) §60.5420b(b)(11)(iii) §60.5420b(b)(11)(iv) §60.5420b(b)(11)(v)(A) §60.5420b(b)(11)(i)(B) §60.5420b(b)(11)(i)(C) §60.5420b(b)(11)(i)(D) §60.5420b(b)(11)(i)(E)

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
				§60.5415b(j)(3) §60.5415b(j)(4) §60.5415b(j)(11) §60.5415b(j)(12) §60.5415b(j)(13) §60.5415b(j)(13) §60.5416b(a)(1) §60.5416b(a)(2) §60.5416b(a)(4) §60.5416b(b)(1)(ii) §60.5416b(b)(2) §60.5416b(b)(3) §60.5416b(b)(5) §60.5416b(b)(6) §60.5416b(b)(7) §60.5416b(b)(8) §60.5417b(a) §60.5417b(c) §60.5417b(d)(8) §60.5417b(e)(2) §60.5417b(e)(4) §60.5417b(e)(5) §60.5417b(g)(1) §60.5417b(g)(4) §60.5417b(g)(5) §60.5417b(g)(7) §60.5417b(h)	§60.5421b(b)	§60.5420b(b)(11)(i)(F) §60.5420b(b)(11)(i)(G) §60.5420b(b)(11)(i)(H) §60.5420b(b)(11)(i)(I) §60.5420b(b)(11)(i)(J) §60.5420b(b)(11)(i)(K) §60.5420b(b)(11)(i)(L) §60.5420b(b)(12) §60.5420b(b)(13) §60.5420b(b)(15) §60.5420b(d) §60.5420b(e) §60.5420b(f) §60.5422b(a) §60.5422b(b) §60.5422b(c)

**Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program**

Table 2a: Deletions

Date: 9/15/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

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)
2	FUG	OP-UA12	600000a-0003	VOC	40 CFR Part 60, Subpart 0000a	Vapor recovery systems: § 60.5400a(a) § 60.482-10a(a) § 60.482-10a(b) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)

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)
						Connectors in gas and vapor and light liquid: § 60.5400a(a) § 60.482-11a(b)(2) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(i) § 60.482-11a(d) [G]§ 60.482-11a(e) [G]§ 60.482-11a(f)(1) § 60.482-11a(f)(2) § 60.482-11a(g) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f) Closed vent system leaks: § 60.5400a(a) § 60.482-10a(a) [G]§ 60.482-10a(f) [G]§ 60.482-10a(g) § 60.482-10a(h) § 60.482-10a(i)

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)
						[G]§ 60.482-10a(j) [G]§ 60.482-10a(k) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f) Pressure relief devices in light liquid or heavy liquid service: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) [G]§ 60.482-2a(c)(2) [G]§ 60.482-7a(e) § 60.482-8a(a) § 60.482-8a(a)(2) § 60.482-8a(b) [G]§ 60.482-8a(c) § 60.482-8a(d) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(f)

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)
						§ 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f) Valves in gas/vapor service or light liquid service: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-7a(a)(1) [G]§ 60.482-7a(a)(2) § 60.482-7a(b) [G]§ 60.482-7a(c) [G]§ 60.482-7a(d) [G]§ 60.482-7a(e) [G]§ 60.482-7a(f) [G]§ 60.482-7a(g) [G]§ 60.482-7a(h) § 60.482-9a(b) [G]§ 60.482-9a(c) § 60.482-9a(e) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f)

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)
						§ 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f) Open-ended valves or lines: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-6a(a)(1) § 60.482-6a(a)(2) § 60.482-6a(b) § 60.482-6a(c) § 60.482-6a(d) § 60.482-6a(e) § 60.485a(b) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f)

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)
						§ 60.5410a § 60.5410a(f) § 60.5415a(f) Pressure relief device in gas/vapor service: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-4a(a) § 60.482-4a(b)(1) § 60.482-4a(b)(2) § 60.482-4a(c) § 60.482-4a(d)(1) § 60.482-4a(d)(2) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(b)(2) § 60.5401a(b)(3)(i) § 60.5401a(b)(3)(ii) § 60.5401a(b)(4)(i)

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)
						§ 60.5401a(b)(4)(ii) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f) Pumps in light liquid service: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-2a(a)(1) § 60.482-2a(a)(2) § 60.482-2a(b)(1) § 60.482-2a(b)(1)(i) § 60.482-2a(b)(1)(ii) § 60.482-2a(b)(2) § 60.482-2a(b)(2)(ii) § 60.482-2a(c)(1) [G]§ 60.482-2a(c)(2) § 60.482-2a(d) [G]§ 60.482-2a(d)(1) § 60.482-2a(d)(2) § 60.482-2a(d)(3) [G]§ 60.482-2a(d)(6) [G]§ 60.482-2a(e) § 60.482-2a(f) [G]§ 60.482-2a(g) § 60.482-2a(h) § 60.482-9a(a) § 60.482-9a(b) [G]§ 60.482-9a(d) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f)

TCEQ 10018 (APDG 5939v2, Revised 06/15) OP-REQ3 - Applicable Requirements Summary

This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 11/08)

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)
						§ 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f)

**Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program**

Table 2b: Deletions

Date: 9/15/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	FUG	OP-UA12	600000a-0003	VOC	Vapor recovery systems: § 60.482-10a(e) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g) Connectors in gas and vapor and light liquid service: § 60.482-11a(a) § 60.482-11a(b) § 60.482-11a(b)(1) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(ii) [G]§ 60.482-11a(b)(3)(iii) § 60.482-11a(b)(3)(iv)	Vapor recovery systems: § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) Connectors in gas and vapor and light liquid service: § 60.482-11a(b)(3)(v) § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.486a(e)(9) § 60.486a(f) § 60.486a(f)(1)	Vapor recovery systems: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Connectors in gas and vapor and light liquid service: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.482-11a(c) § 60.482-9a(a) § 60.485a(a) § 60.482-11a(b)(3)(iv) § 60.482-11a(c) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g) Closed vent system leaks: § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g) Pressure relief devices in light liquid or heavy liquid service: § 60.482-8a(a)(1) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2)	Closed vent system leaks: [G]§ 60.482-10a(l) § 60.485a(b)(2) [G]§ 60.486a(d) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) Pressure relief devices in light liquid or heavy liquid service: § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) Valves in gas/vapor service or light liquid service: § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1)	§ 60.487a(b)(5) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(vii) § 60.487a(c)(2)(viii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Closed vent system leaks: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Pressure relief devices in light liquid or heavy liquid service: § 60.487a(a) § 60.487a(b)

TCEQ 10018 (APDG 5939v2, Revised 06/15) OP-REQ3 - Applicable Requirements Summary

This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 11/08)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.5401a(f) § 60.5401a(g) Valves in gas/vapor service or light liquid service: § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g) Open-ended valves or lines: § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3)	§ 60.486a(f)(2) Open-ended valves or lines: § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) Pressure relief device in gas/vapor service: § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(10) § 60.486a(e)(3) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) [G]§ 60.5421a(b) Pumps in light liquid service: § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2)	§ 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Valves in gas/vapor service or light liquid service: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(2) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(i) § 60.487a(c)(2)(ii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.5401a(g) Pressure relief device in gas/vapor service: § 60.482-4a(b)(2) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(b)(1) § 60.5401a(g) Pumps in light liquid service: § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-2a(b)(2)(i) [G]§ 60.482-2a(d)(4) [G]§ 60.482-2a(d)(5) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g)	[G]§ 60.486a(e)(4) § 60.486a(e)(7) [G]§ 60.486a(e)(8) [G]§ 60.486a(h)	Open-ended valves or lines: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Pressure relief device in gas/vapor service: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) § 60.5422a(b) [G]§ 60.5422a(c)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
							Pumps in light liquid service: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(3) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(iii) § 60.487a(c)(2)(iv) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 9/15/2025	
Permit No.: O4447	
Regulated Entity No.: RN111436614	
Company Name: ET Gathering & Processing LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☒ NO	

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

☐ VOC ☒ NO_x ☒ SO₂ ☐ PM₁₀ ☒ CO ☐ Pb ☐ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☒ YES ☐ NO ☐ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 9/15/2025
Permit No.: O4447
Regulated Entity No.: RN111436614
Company Name: ET Gathering & Processing LLC

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	ADMIN-G	No	FUG	OP-UA1	168018	To incorporate the Alternate Means of Compliance for fugitive monitoring methods Provisional requirements: AMOC.
2	MS-C	No	FUG	OP-UA1	168018	Change in the fugitive monitoring method from NSPS OOOOa Method 21 under 60.5400a to NSPS OOOOb optical gas imaging (OGI) under 60.5400b and Appendix K. The monitoring frequency will not change as part of the revision. Provisional requirements: OP-REQ3

Texas Commission on Environmental Quality

Title V Existing

4447

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	GREY WOLF GAS PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	764 Private Road 211J
City	Kermit
State	TX
ZIP	79789
County	WINKLER
Latitude (N) (##.#####)	31.795
Longitude (W) (-###.#####)	103.258611
Primary SIC Code	1321
Secondary SIC Code	
Primary NAICS Code	211130
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111436614
What is the name of the Regulated Entity (RE)?	GREY WOLF GAS PLANT
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM WINK GO 5.6 MI N ON FM 1232 GO L 3.7 MI ON TX 302 TURN L ON LEASE RD 0.3 MI TO SITE
City	WINK
State	TX
ZIP	79789
County	WINKLER
Latitude (N) (##.#####)	31.795085
Longitude (W) (-###.#####)	-103.2587
Facility NAICS Code	
What is the primary business of this entity?	NATURAL GAS PROCESSING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606187110
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	ET Gathering & Processing LLC
Texas SOS Filing Number	805195570
Federal Tax ID	
State Franchise Tax ID	32091185952
State Sales Tax ID	

Local Tax ID	
DUNS Number	
Number of Employees	501+
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	ENERGY TRANSFER LP
Prefix	MR
First	CHRISTOPHER
Middle	
Last	THOMPSON
Suffix	
Credentials	
Title	VP OPERATIONS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1706 S MIDKIFF RD
Routing (such as Mail Code, Dept., or Attn:)	
City	MIDLAND
State	TX
ZIP	79701
Phone (###-###-####)	4326382042
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	EDDIE RAYBURN(ENERGY TRANSFER...)
Organization Name	ENERGY TRANSFER
Prefix	MR
First	EDDIE
Middle	
Last	RAYBURN
Suffix	
Credentials	
Title	DIRECTOR - OPERATIONS
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1706 S MIDKIFF RD
Routing (such as Mail Code, Dept., or Attn:)	

City	MIDLAND
State	TX
Zip	79701
Phone (###-###-####)	4325528633
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	eddie.rayburn@energytransfer.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

Energy Transfer

Prefix

MS

First

Alena

Middle

Last

Miro

Suffix

Credentials

Title

Senior Manager - Environmental

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

Mailing Address (include Suite or Bldg. here, if applicable)

2564 PECOS HWY

Routing (such as Mail Code, Dept., or Attn:)

City

CARLSBAD

State

NM

ZIP

88220

Phone (###-###-####)

7138656825

Extension

Alternate Phone (###-###-####)

Fax (###-###-####)

E-mail

alena.miro@energytransfer.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	31 Deg 47 Min 42 Sec
3) Permit Longitude Coordinate:	103 Deg 15 Min 31 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application	No

through permit consolidation?

5) Who will electronically sign this Title V application?

Duly Authorized Representative

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

[File Properties]

File Name

OP_2_Grey Wolf OP-2 Form.pdf

Hash

2AA3EFF9150DE93FB48A39C53E51D6091B3838914EA4F0AF71909334B3C3EA20

MIME-Type

application/pdf

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name

OP_REQ3_Grey Wolf OP-REQ3 Form.pdf

Hash

0C2134BDC66F6A0873199689B29A4D11D5BC9503FA97A771F616141F9C1A06E1

MIME-Type

application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name

OP_SUMR_Grey Wolf OP-SUMR Form.pdf

Hash

9EA905D9E1561E44F37E68D48489FB6B5C7EA95EFE3DF3ED5E3F8431A4AFF9FD

MIME-Type

application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name

Grey Wolf OP-UA1 Form.pdf

Hash

173C690A773E49F5CCC40B117FA60B7F5F9685CB3F08EFD9FE479E7A2631112F

MIME-Type

application/pdf

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Full Grey Wolf.pdf
Hash	943C701169E078E7DD040D529EE30459772AA6D447C18C1794BE838FC24180B6
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

[File Properties]

File Name	AMOC-218.pdf
Hash	0A57AD1A953ED41136A9C3EC271A9E25DB437980B9D624390C7F8EBD621BCD4E
MIME-Type	application/pdf

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No
---	----

Certification

I certify that I am the Duly Authorized Representative for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Eddie Rayburn, the owner of the STEERS account ER103918.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 4447.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Eddie Rayburn OWNER OPERATOR

Account Number:	ER103918
Signature IP Address:	63.105.50.19
Signature Date:	2025-09-16
Signature Hash:	061FFD01E50180E23C15B1958EFF200F1DA7B548AC7555F5B161C07FBB48E0A6
Form Hash Code at time of Signature:	38D29199ABB4974EF5DB50AFB461E139E01A873B3CA6676A7DADD3E1A3E8166E

Submission

Reference Number:	The application reference number is 817701
Submitted by:	The application was submitted by ER103918/Eddie Rayburn
Submitted Timestamp:	The application was submitted on 2025-09-16 at 12:31:09 CDT
Submitted From:	The application was submitted from IP address 63.105.50.19
Confirmation Number:	The confirmation number is 678504
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 4447

Additional Information

Application Creator: This account was created by Kaylon Gilbert



September 15, 2025

**Air Permits Initial Review Team (APIRT), MC 161
Texas Commission on Environmental Quality
12100 Park 35 Circle, Building C, Third Floor
Austin, TX 78753**

**RE: Minor Revision Application for SOP No. O4447
ET Gathering & Processing LLC (CN606187110)
Grey Wolf Gas Plant (RN111436614)**

Dear Sir or Madam,

ET Gathering & Processing LLC is submitting the attached minor revision application to revise Site Operating Permit (SOP) O4447 for the Grey Wolf Gas Plant.

If you have any comments or questions, please contact me at (713) 865-6825 or alena.miro@energytransfer.com.

Sincerely,

Alena Miro
Sr. Manager, Environmental

cc: Environmental Protection Agency, Region 6
Air Permits Section
1201 Elm Street, Suite 500
Dallas, TX 75270-2102
Via Email: R6AirPermits@EPA.gov

TCEQ Region 7
Attention: Air Section Manager
ClayDesta Plaza
10 Desta Drive Suite 350E
Midland, TX 79705-3734
Via Email: TCEQR7@tceq.texas.gov

Federal Operating Permit Minor Revision Application

SOP Permit Number O4447

Grey Wolf Gas Plant

Winkler County, Texas

September 2025

PREPARED FOR:

ET Gathering & Processing LLC

Houston, Texas

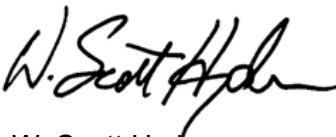
TCEQ PROJECT: TBD

SPIRIT PROJECT: PROJ-058786

FOR SPIRIT ENVIRONMENTAL:



Kaylon Gilbert



W. Scott Hyden

OFFICE: 281-664-2490

FAX: 281-664-2491

20465 State Highway 249, Suite 300
Houston, TX 77070

spiritenv.com

Table of Contents

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3.0	SOP Forms, AMOC	3-1

1.0 Introduction

ET Gathering & Processing LLC (Energy Transfer) (CN606187110) is submitting a Federal Operating Permit (FOP) application for the Grey Wolf Gas Plant (Grey Wolf GP) (RN111436614) to revise the Title V Site Operating Permit (SOP) Number (No.) O4447. Grey Wolf GP is located in Winkler County, which is classified as an attainment county for all criteria pollutants.

The purpose of this minor revision is to incorporate the Alternate Means of Compliance (AMOC) No. 218 for fugitive monitoring methods as well as change the fugitive regulatory applicability from New Source Performance Standard (NSPS) Subpart OOOOa to Subpart OOOOb to align with the AMOC and create a single set of fugitive regulatory standards and Optical Gas Imaging (OGI) monitoring methods for the site.

Section 2.0 contains a process description for the site. Section 3.0 contains all required Texas Commission on Environmental Quality (TCEQ) forms for the application.

1.1 Facility Contact Information

Registrant:	ET Gathering & Processing LLC 1300 Main Street Houston, TX 77002
Regulated Entity Number:	RN111436614
Customer Reference Number:	CN606187110
Facility Operations:	Grey Wolf Gas Plant
SOP Number:	O4447
Nearest City:	Wink, TX
County:	Winkler
Responsible Official:	Name: Chris Thompson Title: Vice President Operations Company: Energy Transfer LP Address: 1706 S. Midkiff Road Midland, TX 79701 Phone: (432) 638-2042 Email: chris.thompson@energytransfer.com
Duly Authorized Representative	Name: Eddie Rayburn Title: Director of Operations Company: Energy Transfer LP Address: 1706 S. Midkiff Road Midland, TX 79701 Phone: (432) 552-8633 Email: eddie.rayburn@energytransfer.com
Technical Contact Information:	Name: Alena Miro Title: Sr. Manager - Environmental Company: Energy Transfer Address: 2564 Pecos Highway Carlsbad, NM 88220 Phone: (713) 865-6825 Email: alena.miro@energytransfer.com

1.2 Federal Attainment/Major Source Status

Company Name	ET Gathering & Processing LLC				
Facility Name	Grey Wolf Gas Plant				
County	Winkler				
NAAQS Pollutant	Nonattainment Status of the County	Federal Clean Air Act Title V		Prevention of Significant Deterioration (PSD)	
		30 TAC §122.10(13) Major Source Threshold (tpy)	Major or Minor?	40 CFR §52.21(b)(1)(i) Major Source Threshold (tpy)	Major or Minor?
VOC	Attainment	100	Minor	250	Minor
NO _x	Attainment	100	Major	250	Minor
CO	Attainment	100	Major	250	Minor
PM	Attainment	100	Minor	250	Minor
SO ₂	Attainment	100	Major	250	Minor
Lead	Attainment	100	Minor	250	Minor
Single HAP	--	10	Minor	--	--
Aggregate	--	25	Minor	--	--
Any other	Attainment	100	None	250	None
Title V Federal Operating Permit Required?			Yes		
Title V Federal Operating Permit Number			O4447		
PSD Permit Required?				No	
PSD Permit Number				N/A	

1.3 Current Authorizations

Presently, emissions resulting from the site's operations are authorized by Standard Permit (SP) Permit No. 168018 and unregistered Permit By Rule (PBR) 30 TAC §106.359.

2.0 Process Description

The Grey Wolf GP is a natural gas processing plant (SIC 1321). The following paragraphs describe emission sources and processes at this site.

Natural gas will enter the Grey Wolf GP through slug catchers and inlet filters where entrained liquids will be separated from the inlet gas. The liquids along with field condensate that is trucked into the Grey Wolf GP will be processed in a condensate stabilization system which will produce Y-Grade product and stabilized condensate. Heat for the stabilization system will be provided by a hot oil system and natural gas-fueled heater (Facility Identification Number [FIN] HMO-HTR). The stabilized condensate, which can have a Reid Vapor Pressure (RVP) ranging from two (2) to nine (9) pounds per square inch (psi) as the market dictates, will be pumped into four (4) 450-barrel (bbl) atmospheric storage tanks (FINs T-2 through T-5) and loaded out by trucks (FIN LOAD2) as necessary. The storage tank vapors will be captured by a vapor recovery unit (VRU) and routed back to the inlet. Truck loading emissions will be combusted by a truck loading flare (FIN FLARE2). Y-Grade product will be stored in pressurized tanks and exit the Grey Wolf GP via pipeline.

Overhead flash gas from the stabilization system will be captured by multiple electric-driven VRUs, compressed, and recycled back to inlet suction. Two (2) VRU compressors operate at all times during normal operations. In the event that a VRU compressor is shut down for maintenance, the vapors that cannot be captured by the remaining VRU compressor as the spare compressor is brought on-line will be sent to the Grey Wolf GP flare (FIN FLARE1) for combustion. All maintenance, startup, and shutdown (MSS) related emissions at the Grey Wolf GP are authorized under PBR at 30 TAC §106.359.

The inlet gas stream will be routed to the amine sweetening unit (FIN AMINE) for removal of carbon dioxide (CO₂) and hydrogen sulfide (H₂S). CO₂ and H₂S will be removed from the natural gas in a two-step amine process. Gas will enter the bottom of the amine contactors where it will encounter lean amine solution in counter-current flow. CO₂ and H₂S contained in the natural gas will be absorbed in the amine. Sweetened natural gas will exit the top of the amine contactors and flow to the Grey Wolf GP's dehydration systems. Rich amine containing absorbed CO₂ and H₂S will flow to the amine flash tank where entrained natural gas vapors will be separated from the rich amine. The flash gas will be routed to the hot oil heater fuel system. If the fuel system pressure

becomes too high, the flash gas will be sent to the Grey Wolf GP flare (FIN FLARE1) for destruction. Rich amine will then enter the amine regenerator still where it will be heated to drive off CO₂ and H₂S. Lean amine will be pumped from the bottom of the still to the amine contactors to repeat the process.

CO₂ and H₂S-rich vapor will exit the top of the regenerator still, be cooled in aerial coolers, and then flow into a still reflux accumulator where condensed liquids and acid gas will be separated. The condensed liquids will be pumped back to the amine still as reflux. The acid gas vapor will be routed to a thermal oxidizer (FIN TO) where the H₂S, volatile organic compounds (VOC), and other hydrocarbons will be incinerated. The acid gas may be routed to the Grey Wolf GP flare (FIN FLARE1) during thermal oxidizer downtime.

Dehydration will be accomplished using a TEG unit (FIN DEHY) and a mol sieve unit. Sweet natural gas from the amine contactors will enter the bottom of the glycol contactor where it will encounter TEG in counter-current flow. The TEG will absorb water from the natural gas. Dry natural gas will exit the top of the glycol contactor and be routed to the mol sieve unit where heat for regeneration of the mol sieve beds will be supplied by a regenerator heater (FIN REGEN-HTR). Rich TEG (water-saturated) leaving the glycol contactor will be sent to a flash tank where entrained vapors will be separated from the rich TEG. The flash gas will be routed to the hot oil heater fuel system. If the fuel system pressure becomes too high, the flash gas will be sent to the Grey Wolf GP flare (FIN FLARE1) for destruction. Rich glycol will leave the flash tank and enter the glycol regenerator still. Absorbed water and hydrocarbons will be driven off by heat from the glycol reboiler (FIN TEGREB). Lean glycol will be recirculated to the glycol contactor. The still overhead vapor will pass through a BTEX condenser to remove water and heavy hydrocarbons. Any non-condensable vapors will be routed to the thermal oxidizer (FIN TO) for combustion or may be routed to the Grey Wolf GP flare (FIN FLARE1) during thermal oxidizer downtime. Condensed water and hydrocarbons will be sent to a 500-bbl atmospheric slop oil/water storage tank (FIN T-1) as well as liquids from various plant drains and sumps and loaded out by truck (FIN LOAD1) as necessary. Truck loading emissions will be combusted by a truck loading flare (FIN FLARE2).

After dehydration, sweet, dry natural gas will be routed to the cryogenic process for recovery of NGL. Liquids will be removed by chilling the natural gas while reducing the stream pressure to the point where the NGL condenses out from the gas stream. This will be accomplished using

electric motor-driven compressors and turboexpanders and propane refrigeration. The resulting NGL will be treated in amine liquid contactors prior to being discharged from the Grey Wolf GP via pipeline. Rich amine from the NGL amine contactors will be regenerated with the rich amine from the natural gas amine contactors in the amine regenerator still.

Residue gas leaving the cryogenic unit will be compressed by three (3) dual-drive engine-driven recompressors (FINs C-1 through C-3) prior to being sent out through the residue pipeline.

The Grey Wolf GP may generate fugitive emissions (FIN FUG) from equipment components such as piping fittings, pumps, and compressor seals. Energy Transfer will implement a Leak Detection and Repair (LDAR) program to minimize emissions from leaks at the Grey Wolf GP.

Heat for the amine treating system and cryogenic plant will be provided by a hot oil system and natural gas-fueled heater (FIN HMO-HTR2). The Grey Wolf GP will also be equipped with various fixed roof tanks (FIN TK-MISC) storing lube oil, antifreeze, methanol, glycol, and amine to support the operations on site.

3.0 SOP Forms, AMOC

Section 3.0 includes all forms necessary to revise the existing SOP No. O4447. The following list outlines the included forms.

- OP-2, Application for Permit Revision
- OP-UA1, Miscellaneous and Generic Unit Attributes
- OP-REQ3, Applicable Requirements Summary
- OP-SUMR, Individual Unit Summary for Revisions
- AMOC No. 218

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 9/15/2025	
Permit No.: O4447	
Regulated Entity No.: RN111436614	
Company Name: ET Gathering & Processing LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☒ NO	

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

☐ VOC ☒ NO_x ☒ SO₂ ☐ PM₁₀ ☒ CO ☐ Pb ☐ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☒ YES ☐ NO ☐ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 9/15/2025
Permit No.: O4447
Regulated Entity No.: RN111436614
Company Name: ET Gathering & Processing LLC

Using the table below, provide a description of the revision.

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	ADMIN-G	No	FUG	OP-UA1	168018	To incorporate the Alternate Means of Compliance for fugitive monitoring methods Provisional requirements: AMOC.
2	MS-C	No	FUG	OP-UA1	168018	Change in the fugitive monitoring method from NSPS OOOOa Method 21 under 60.5400a to NSPS OOOOb optical gas imaging (OGI) under 60.5400b and Appendix K. The monitoring frequency will not change as part of the revision. Provisional requirements: OP-REQ3

**Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program**

Date:	9/15/2025
Permit No.:	O4447
Regulated Entity No.:	RN111436614

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	600000Ob-0001	EU				Fugitive monitoring requirements associated with NSPS 0000Ob for which a unit attribute form and applicability flowchart has not yet been created. All applicable citations are included on Form OP-REQ3.

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

Table 1a: Additions

Date: 9/15/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

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)
2	FUG	OP-UA1	600000b-0001	VOC	40 CFR Part 60, Subpart OOOOb	§60.5370b(a)(4) §60.5370b(b) §60.5400b(a) §60.5400b(b) §60.5400b(c) §60.5400b(d) §60.5400b(e) §60.5400b(f) §60.5400b(g) §60.5400b(h) §60.5400b(i) §60.5400b(j) §60.5410b(h) §60.5411b(a)(2) §60.5411b(a)(3) §60.5411b(a)(4) §60.5411b(c) §60.5412b(a)(3) §60.5412b(b) §60.5415b(f)(1)(i) §60.5415b(f)(1)(ii) §60.5415b(f)(1)(iii) §60.5415b(f)(1)(iv)

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)
						§60.5415b(f)(1)(v) §60.5415b(f)(1)(vi) §60.5415b(f)(1)(vii)(A) §60.5415b(f)(1)(vii)(B) §60.5415b(f)(1)(x) §60.5415b(j)

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: 9/15/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	FUG	600000b-0001	VOC	§60.5400b(b) §60.5400b(c) §60.5400b(d) §60.5400b(e) §60.5400b(g) §60.5400b(h) §60.5410b(h)(1) §60.5410b(h)(2) §60.5410b(h)(3) §60.5410b(h)(4) §60.5410b(h)(5) §60.5410b(h)(6) §60.5410b(h)(7) §60.5410b(h)(8) §60.5410b(h)(9) §60.5410b(h)(10) §60.5410b(h)(12) §60.5415b(f)(1)(x) §60.5415b(j)(1) §60.5415b(j)(2)	§60.5400b(l) §60.5410b(h)(11)(vi) §60.5410b(h)(15) §60.5411b(c) §60.5415b(j)(15) §60.5416b(b)(9) §60.5420b(c)(8)(i) §60.5420b(c)(8)(ii) §60.5420b(c)(8)(iii) §60.5420b(c)(8)(iv) §60.5420b(c)(10) §60.5420b(c)(11)(ii) §60.5420b(c)(11)(iv) §60.5420b(c)(11)(v) §60.5420b(c)(11)(vi) §60.5420b(c)(11)(vii) §60.5420b(c)(12) §60.5420b(c)(13) §60.5421b(a)	§60.7(a)(1) §60.7(a)(3) §60.7(a)(4) §60.15(d) §60.5400b(k) §60.5410b(h)(13) §60.5410b(h)(14) §60.5415b(j)(14) §60.5417b(j) §60.5420b(a)(1) §60.5420b(b)(1) §60.5420b(b)(11)(i) §60.5420b(b)(11)(ii) §60.5420b(b)(11)(iii) §60.5420b(b)(11)(iv) §60.5420b(b)(11)(v)(A) §60.5420b(b)(11)(i)(B) §60.5420b(b)(11)(i)(C) §60.5420b(b)(11)(i)(D) §60.5420b(b)(11)(i)(E)

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
				§60.5415b(j)(3) §60.5415b(j)(4) §60.5415b(j)(11) §60.5415b(j)(12) §60.5415b(j)(13) §60.5415b(j)(13) §60.5416b(a)(1) §60.5416b(a)(2) §60.5416b(a)(4) §60.5416b(b)(1)(ii) §60.5416b(b)(2) §60.5416b(b)(3) §60.5416b(b)(5) §60.5416b(b)(6) §60.5416b(b)(7) §60.5416b(b)(8) §60.5417b(a) §60.5417b(c) §60.5417b(d)(8) §60.5417b(e)(2) §60.5417b(e)(4) §60.5417b(e)(5) §60.5417b(g)(1) §60.5417b(g)(4) §60.5417b(g)(5) §60.5417b(g)(7) §60.5417b(h)	§60.5421b(b)	§60.5420b(b)(11)(i)(F) §60.5420b(b)(11)(i)(G) §60.5420b(b)(11)(i)(H) §60.5420b(b)(11)(i)(I) §60.5420b(b)(11)(i)(J) §60.5420b(b)(11)(i)(K) §60.5420b(b)(11)(i)(L) §60.5420b(b)(12) §60.5420b(b)(13) §60.5420b(b)(15) §60.5420b(d) §60.5420b(e) §60.5420b(f) §60.5422b(a) §60.5422b(b) §60.5422b(c)

**Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program**

Table 2a: Deletions

Date: 9/15/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

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)
2	FUG	OP-UA12	600000a-0003	VOC	40 CFR Part 60, Subpart 0000a	Vapor recovery systems: § 60.5400a(a) § 60.482-10a(a) § 60.482-10a(b) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)

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)
						Connectors in gas and vapor and light liquid: § 60.5400a(a) § 60.482-11a(b)(2) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(i) § 60.482-11a(d) [G]§ 60.482-11a(e) [G]§ 60.482-11a(f)(1) § 60.482-11a(f)(2) § 60.482-11a(g) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f) Closed vent system leaks: § 60.5400a(a) § 60.482-10a(a) [G]§ 60.482-10a(f) [G]§ 60.482-10a(g) § 60.482-10a(h) § 60.482-10a(i)

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)
						[G]§ 60.482-10a(j) [G]§ 60.482-10a(k) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f) Pressure relief devices in light liquid or heavy liquid service: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) [G]§ 60.482-2a(c)(2) [G]§ 60.482-7a(e) § 60.482-8a(a) § 60.482-8a(a)(2) § 60.482-8a(b) [G]§ 60.482-8a(c) § 60.482-8a(d) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(f)

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)
						§ 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f) Valves in gas/vapor service or light liquid service: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-7a(a)(1) [G]§ 60.482-7a(a)(2) § 60.482-7a(b) [G]§ 60.482-7a(c) [G]§ 60.482-7a(d) [G]§ 60.482-7a(e) [G]§ 60.482-7a(f) [G]§ 60.482-7a(g) [G]§ 60.482-7a(h) § 60.482-9a(b) [G]§ 60.482-9a(c) § 60.482-9a(e) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f)

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)
						§ 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f) Open-ended valves or lines: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-6a(a)(1) § 60.482-6a(a)(2) § 60.482-6a(b) § 60.482-6a(c) § 60.482-6a(d) § 60.482-6a(e) § 60.485a(b) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f)

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)
						§ 60.5410a § 60.5410a(f) § 60.5415a(f) Pressure relief device in gas/vapor service: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-4a(a) § 60.482-4a(b)(1) § 60.482-4a(b)(2) § 60.482-4a(c) § 60.482-4a(d)(1) § 60.482-4a(d)(2) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(b)(2) § 60.5401a(b)(3)(i) § 60.5401a(b)(3)(ii) § 60.5401a(b)(4)(i)

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)
						§ 60.5401a(b)(4)(ii) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f) Pumps in light liquid service: § 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-2a(a)(1) § 60.482-2a(a)(2) § 60.482-2a(b)(1) § 60.482-2a(b)(1)(i) § 60.482-2a(b)(1)(ii) § 60.482-2a(b)(2) § 60.482-2a(b)(2)(ii) § 60.482-2a(c)(1) [G]§ 60.482-2a(c)(2) § 60.482-2a(d) [G]§ 60.482-2a(d)(1) § 60.482-2a(d)(2) § 60.482-2a(d)(3) [G]§ 60.482-2a(d)(6) [G]§ 60.482-2a(e) § 60.482-2a(f) [G]§ 60.482-2a(g) § 60.482-2a(h) § 60.482-9a(a) § 60.482-9a(b) [G]§ 60.482-9a(d) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f)

TCEQ 10018 (APDG 5939v2, Revised 06/15) OP-REQ3 - Applicable Requirements Summary

This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 11/08)

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)
						§ 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f)

**Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program**

Table 2b: Deletions

Date: 9/15/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	FUG	OP-UA12	600000a-0003	VOC	Vapor recovery systems: § 60.482-10a(e) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g) Connectors in gas and vapor and light liquid service: § 60.482-11a(a) § 60.482-11a(b) § 60.482-11a(b)(1) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(ii) [G]§ 60.482-11a(b)(3)(iii) § 60.482-11a(b)(3)(iv)	Vapor recovery systems: § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) Connectors in gas and vapor and light liquid service: § 60.482-11a(b)(3)(v) § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.486a(e)(9) § 60.486a(f) § 60.486a(f)(1)	Vapor recovery systems: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Connectors in gas and vapor and light liquid service: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.482-11a(c) § 60.482-9a(a) § 60.485a(a) § 60.482-11a(b)(3)(iv) § 60.482-11a(c) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g) Closed vent system leaks: § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g) Pressure relief devices in light liquid or heavy liquid service: § 60.482-8a(a)(1) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2)	Closed vent system leaks: [G]§ 60.482-10a(l) § 60.485a(b)(2) [G]§ 60.486a(d) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) Pressure relief devices in light liquid or heavy liquid service: § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) Valves in gas/vapor service or light liquid service: § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1)	§ 60.487a(b)(5) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(vii) § 60.487a(c)(2)(viii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Closed vent system leaks: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Pressure relief devices in light liquid or heavy liquid service: § 60.487a(a) § 60.487a(b)

TCEQ 10018 (APDG 5939v2, Revised 06/15) OP-REQ3 - Applicable Requirements Summary

This form is for use by sources subject to air quality permit requirements and may be revised periodically. (Title V Release 11/08)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.5401a(f) § 60.5401a(g) Valves in gas/vapor service or light liquid service: § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g) Open-ended valves or lines: § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3)	§ 60.486a(f)(2) Open-ended valves or lines: § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) Pressure relief device in gas/vapor service: § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(10) § 60.486a(e)(3) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) [G]§ 60.5421a(b) Pumps in light liquid service: § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2)	§ 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Valves in gas/vapor service or light liquid service: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(2) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(i) § 60.487a(c)(2)(ii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.5401a(g) Pressure relief device in gas/vapor service: § 60.482-4a(b)(2) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(b)(1) § 60.5401a(g) Pumps in light liquid service: § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-2a(b)(2)(i) [G]§ 60.482-2a(d)(4) [G]§ 60.482-2a(d)(5) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g)	[G]§ 60.486a(e)(4) § 60.486a(e)(7) [G]§ 60.486a(e)(8) [G]§ 60.486a(h)	Open-ended valves or lines: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) Pressure relief device in gas/vapor service: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) § 60.5422a(b) [G]§ 60.5422a(c)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
							Pumps in light liquid service: § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(3) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(iii) § 60.487a(c)(2)(iv) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

Table 1

Date	Permit No.	Regulated Entity No.
9/15/2025	O4447	RN111436614

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	FUG	OP-UA1	Site Fugitives		168018	
	2	FUG	OP-UA1	Site Fugitives		168018	

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2025

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

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

Dear Mr. Clark:

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

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

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

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

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

Re: AMOC 218

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

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

Sincerely,



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

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

Project Number: 351877

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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

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

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

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

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

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

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

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

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

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

A. General Requirements and Applicability.

1. The following are applicable to this condition:

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

2. The following are exempt from this condition:

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

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

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

B. Operational And Emissions Limits.

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

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

- II. Is demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background as determined by Method 21 initially upon designation, annually, and at other times requested by the Administrator.
- g. Any pump that is designated as an UTM pump is exempt.
- ii. For each pressure relief device (PRD) in gas/vapor service, comply with the following:
 - a. Monitor each pressure relief device quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater above background.
 - b. In addition, after each pressure release, monitor each pressure relief device within 5 calendar days to detect leaks using or Method 21 unless the device is located in a non-fractionating plant that is monitored only by non-plant personnel which may be monitored after a pressure release the next time the monitoring personnel are onsite or within 30 calendar days after a pressure release, whichever is sooner. No pressure relief device may be allowed to operate for more than 30 calendar days after a pressure release without monitoring.
 - c. Any pressure relief device that is routed to a process or fuel gas system or equipped with a CVS to a control device must comply with the applicable requirements of this condition.
 - d. Pressure relief devices equipped with a rupture disk are exempt from fugitive monitoring requirements provided a new rupture disk is installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in the delay of repair criteria in paragraph (C).
- iii. Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve, except as provided in (d) or (e) of this paragraph. The cap, blind flange, plug, or second valve must seal the open end of the valve or line at all times except during operations requiring process fluid flow through the open-ended valve or line.
 - a. If evidence of a leak is found at any time by AVO, or any other detection method, a leak is detected and must be repaired in accordance with this condition. A leak is defined as an instrument reading of 500 ppmv or greater if Method 21 of appendix A-7 to this part is used.
 - b. Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
 - c. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall remain closed at all other times.
 - d. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of this paragraph.
 - e. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block-and-bleed system are exempt from the requirements of this section.
- iv. Each valve in gas/vapor or light liquid service must be monitored quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater. A valve that begins operation in gas/vapor service or in light liquid service after the initial startup date for the process unit must be monitored for the first time within 90 days after the end of its startup period to ensure proper installation, except for a valve that replaces a leaking valve, or is designated as UTM, DTM, or no detectable emissions.
- v. For each pump, valve, and connector in heavy liquid service and pressure relief device in light liquid or heavy liquid service, if evidence of a potential leak is found at any time by AVO, or any other detection method, comply with one of the following:
 - a. Monitor the equipment within 5 calendar days by OGI or Method 21 and repair any leaks detected according to paragraph C of this condition. An instrument reading of 10,000 ppmv or greater is defined as a leak.
 - b. Designate the AVO, or other indication of a leak, as a leak and repair the leak according to paragraph C of this condition.

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

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

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

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

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

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

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

D. Initial Compliance

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

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

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

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

III. Conduct the continuous parameter monitoring system equipment performance checks, system accuracy audits, or other audit procedures specified in the monitoring plan at least once every 12 months.

v. Tag and repair each identified leak as required in paragraph (C).

3. Submit any required site monitoring plans and an initial semiannual report for each fugitive emissions component no later than 90 days after the end of the initial compliance period specified in subparagraph (2) above. Submit all reports through CEDRI for 40 CFR 60, Subpart OOOOb. Include the following information:

- i. Company name, facility site name, and address of the affected facility. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report".
- ii. Beginning and ending dates of the reporting period.
- iii. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If the report is submitted via CEDRI, the certifier's electronic signature must be included.
- iv. For each process unit: identification number/name; and number of valves, pumps, connectors, and PRDs subject to the monitoring required in this condition, indicating light or heavy service.
- v. For each month during the semiannual reporting period for each process unit: the number of valves, pumps, connectors, PRDs, and open-ended valves or lines for which leaks were detected; the number of any component(s) for which leaks were not repaired as required by this condition; and the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.
- vi. Dates of process unit shutdowns which occurred within the semiannual reporting period.
- vii. For any CVS or control device, manufacturer's written operating instructions, procedures, operating envelopes, and any performance tests. Maintain detailed records of inspections, identified leaks, repairs, maintenance, pilots, gas flow rates, and parametric monitoring, as applicable.

E. **Continuous Compliance.** At a minimum, demonstrate on-going compliance with the following for each fugitive component:

1. Conduct initial and periodic monitoring surveys as required by this condition.
2. Tag and repair each identified source of fugitive emissions as required paragraph (C) of this condition.
3. Submit semiannual and annual reports. All reports must contain the information required in subparagraphs (D)(1)-(3), as applicable. If changes have occurred since the previous report, include revisions to applicable items and subsequent compliance demonstrations. Include updates to any fugitive monitoring.

F. **Records.** At a minimum, meet the following for compliance demonstrations:

1. All records must be maintained either onsite or at the nearest local field office for at least 5 years and made available upon request.
2. Any records that are submitted electronically via EPA's CEDRI may be maintained in electronic format. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report". The ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to EPA, TCEQ, or any local air pollution control program with jurisdiction as part of an on-site compliance evaluation.
3. Maintain a file of: all measurements and surveys, including OGI, Method 21, continuous monitoring systems, monitoring devices, and performance testing measurements; all survey and monitoring system performance evaluations; all device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by these conditions recorded in a permanent form suitable for inspection.

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

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2025

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

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

Dear Mr. Clark:

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

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

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

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

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

Re: AMOC 218

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

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

Sincerely,



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

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

Project Number: 351877

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



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

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

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

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

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

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

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

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

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

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

A. General Requirements and Applicability.

1. The following are applicable to this condition:

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

2. The following are exempt from this condition:

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

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

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

B. Operational And Emissions Limits.

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

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

- II. Is demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background as determined by Method 21 initially upon designation, annually, and at other times requested by the Administrator.
- g. Any pump that is designated as an UTM pump is exempt.
- ii. For each pressure relief device (PRD) in gas/vapor service, comply with the following:
 - a. Monitor each pressure relief device quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater above background.
 - b. In addition, after each pressure release, monitor each pressure relief device within 5 calendar days to detect leaks using or Method 21 unless the device is located in a non-fractionating plant that is monitored only by non-plant personnel which may be monitored after a pressure release the next time the monitoring personnel are onsite or within 30 calendar days after a pressure release, whichever is sooner. No pressure relief device may be allowed to operate for more than 30 calendar days after a pressure release without monitoring.
 - c. Any pressure relief device that is routed to a process or fuel gas system or equipped with a CVS to a control device must comply with the applicable requirements of this condition.
 - d. Pressure relief devices equipped with a rupture disk are exempt from fugitive monitoring requirements provided a new rupture disk is installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in the delay of repair criteria in paragraph (C).
- iii. Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve, except as provided in (d) or (e) of this paragraph. The cap, blind flange, plug, or second valve must seal the open end of the valve or line at all times except during operations requiring process fluid flow through the open-ended valve or line.
 - a. If evidence of a leak is found at any time by AVO, or any other detection method, a leak is detected and must be repaired in accordance with this condition. A leak is defined as an instrument reading of 500 ppmv or greater if Method 21 of appendix A-7 to this part is used.
 - b. Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
 - c. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall remain closed at all other times.
 - d. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of this paragraph.
 - e. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block-and-bleed system are exempt from the requirements of this section.
- iv. Each valve in gas/vapor or light liquid service must be monitored quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater. A valve that begins operation in gas/vapor service or in light liquid service after the initial startup date for the process unit must be monitored for the first time within 90 days after the end of its startup period to ensure proper installation, except for a valve that replaces a leaking valve, or is designated as UTM, DTM, or no detectable emissions.
- v. For each pump, valve, and connector in heavy liquid service and pressure relief device in light liquid or heavy liquid service, if evidence of a potential leak is found at any time by AVO, or any other detection method, comply with one of the following:
 - a. Monitor the equipment within 5 calendar days by OGI or Method 21 and repair any leaks detected according to paragraph C of this condition. An instrument reading of 10,000 ppmv or greater is defined as a leak.
 - b. Designate the AVO, or other indication of a leak, as a leak and repair the leak according to paragraph C of this condition.

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

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

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

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

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

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

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

D. Initial Compliance

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

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

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

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

III. Conduct the continuous parameter monitoring system equipment performance checks, system accuracy audits, or other audit procedures specified in the monitoring plan at least once every 12 months.

v. Tag and repair each identified leak as required in paragraph (C).

3. Submit any required site monitoring plans and an initial semiannual report for each fugitive emissions component no later than 90 days after the end of the initial compliance period specified in subparagraph (2) above. Submit all reports through CEDRI for 40 CFR 60, Subpart OOOOb. Include the following information:

- i. Company name, facility site name, and address of the affected facility. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report".
- ii. Beginning and ending dates of the reporting period.
- iii. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If the report is submitted via CEDRI, the certifier's electronic signature must be included.
- iv. For each process unit: identification number/name; and number of valves, pumps, connectors, and PRDs subject to the monitoring required in this condition, indicating light or heavy service.
- v. For each month during the semiannual reporting period for each process unit: the number of valves, pumps, connectors, PRDs, and open-ended valves or lines for which leaks were detected; the number of any component(s) for which leaks were not repaired as required by this condition; and the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.
- vi. Dates of process unit shutdowns which occurred within the semiannual reporting period.
- vii. For any CVS or control device, manufacturer's written operating instructions, procedures, operating envelopes, and any performance tests. Maintain detailed records of inspections, identified leaks, repairs, maintenance, pilots, gas flow rates, and parametric monitoring, as applicable.

E. **Continuous Compliance.** At a minimum, demonstrate on-going compliance with the following for each fugitive component:

1. Conduct initial and periodic monitoring surveys as required by this condition.
2. Tag and repair each identified source of fugitive emissions as required paragraph (C) of this condition.
3. Submit semiannual and annual reports. All reports must contain the information required in subparagraphs (D)(1)-(3), as applicable. If changes have occurred since the previous report, include revisions to applicable items and subsequent compliance demonstrations. Include updates to any fugitive monitoring.

F. **Records.** At a minimum, meet the following for compliance demonstrations:

1. All records must be maintained either onsite or at the nearest local field office for at least 5 years and made available upon request.
2. Any records that are submitted electronically via EPA's CEDRI may be maintained in electronic format. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report". The ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to EPA, TCEQ, or any local air pollution control program with jurisdiction as part of an on-site compliance evaluation.
3. Maintain a file of: all measurements and surveys, including OGI, Method 21, continuous monitoring systems, monitoring devices, and performance testing measurements; all survey and monitoring system performance evaluations; all device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by these conditions recorded in a permanent form suitable for inspection.

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

Texas Commission on Environmental Quality

Flare Attributes

Form OP-UA7 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 and 61 (40 CFR Part 60 and 40 CFR Part 61)

Subpart A: General Provisions of Standards of Performance for New Stationary Sources and National Emission Standards for Hazardous Air Pollutants

Date	Permit No.:	Regulated Entity No.
8/19/2025	04447	RN111436614

Unit ID No.	SOP/GOP Index No.	Subject to 40 CFR §60.18	Adhering to Heat Content Specifications	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
FLARE2	60A	NO				
FLARE1	60A	YES	YES	AIR		

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application 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 Information
RN: RN111436614
CN: CN606187110
Account No.: WMA032F
Permit No.: O4447
Project No.: 37118
Area Name: Grey Wolf Gas Plant
Company Name: ET Gathering & Processing LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☒ Update to Permit Application
☐ Other: _____

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Eddie Rayburn</u> certify that I am the <u>DAR</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From <u>1/7/2025</u> to <u>8/20/2025</u> <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____
Title: <u>Director – Operations</u>

Texas Commission on Environmental Quality

Title V Existing

4447

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	GREY WOLF GAS PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	764 Private Road 211J
City	Kermit
State	TX
ZIP	79789
County	WINKLER
Latitude (N) (##.#####)	31.795
Longitude (W) (-###.#####)	103.258611
Primary SIC Code	1321
Secondary SIC Code	
Primary NAICS Code	211130
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111436614
What is the name of the Regulated Entity (RE)?	GREY WOLF GAS PLANT
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM WINK GO 5.6 MI N ON FM 1232 GO L 3.7 MI ON TX 302 TURN L ON LEASE RD 0.3 MI TO SITE
City	WINK
State	TX
ZIP	79789
County	WINKLER
Latitude (N) (##.#####)	31.795085
Longitude (W) (-###.#####)	-103.2587
Facility NAICS Code	
What is the primary business of this entity?	NATURAL GAS PROCESSING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606187110
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	ET Gathering & Processing LLC
Texas SOS Filing Number	805195570
Federal Tax ID	
State Franchise Tax ID	32091185952
State Sales Tax ID	

Local Tax ID
DUNS Number
Number of Employees 501+
Independently Owned and Operated? Yes
I certify that the full legal name of the entity
applying for this permit has been provided and
is legally authorized to do business in Texas. Yes

Responsible Official Contact

Person TCEQ should contact for questions
about this application:

Organization Name	ENERGY TRANSFER LP
Prefix	MR
First	TOBY
Middle	
Last	CLARK
Suffix	
Credentials	
Title	VICE PRESIDENT OPERATIONS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1706 S MIDKIFF RD
Routing (such as Mail Code, Dept., or Attn:)	
City	MIDLAND
State	TX
ZIP	79701
Phone (###-###-####)	4326149387
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	toby.clark@energytransfer.com

Technical Contact

Person TCEQ should contact for questions
about this application:

Select existing TC contact or enter a new contact.	LISA GARCIA(ENERGY TRANSFER...)
Organization Name	ENERGY TRANSFER LP
Prefix	MS
First	LISA
Middle	
Last	GARCIA
Suffix	
Credentials	
Title	SR MANAGER ENGINEERING - E&C ENVIRONMENTAL
Enter new address or copy one from list:	
Mailing Address	

Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1300 MAIN ST
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77002
Phone (###-###-####)	7139897762
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	lisa.garcia@energytransfer.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	31 Deg 47 Min 42 Sec
3) Permit Longitude Coordinate:	103 Deg 15 Min 31 Sec
4) Is this submittal a new application or an update to an existing application?	Update
4.1. Select the permit/project number for which this update should be applied.	4447-37118
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

Attach OP-2 (Application for Permit Revision/Renewal)

Attach OP-ACPS (Application Compliance Plan and Schedule)

Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name

OP-UA7 Table 3_updated 8_19_25.pdf

Hash

43A5086B31C802A164686AA72D3A0726BE3A1B74E3A832A102853EB3BFC4258C

MIME-Type

application/pdf

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

OP-CRO1_8_20_25.pdf

Hash

DEA916DA151779488479D1D4A8E37849B0A9F804671A07F7CC4F379B5B1ED25E

MIME-Type

application/pdf

An additional space to attach any other necessary information needed to complete the permit.

Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Eddie Rayburn, the owner of the STEERS account ER103918.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 4447.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Eddie Rayburn OWNER OPERATOR

Account Number:

ER103918

Signature IP Address:

63.105.50.19

Signature Date:

2025-08-20

Signature Hash:

061FFD01E50180E23C15B1958EFF200F1DA7B548AC7555F5B161C07FBB48E0A6

Form Hash Code at
time of Signature:

7C5068DB137DEBE845D8EEB775296EBDF7451D87A1D1FEBE1E14481C871F9478

Submission

Reference Number:

The application reference number is 810452

Submitted by:

The application was submitted by
ER103918/Eddie Rayburn

Submitted Timestamp:

The application was submitted on 2025-08-20
at 08:07:57 CDT

Submitted From:

The application was submitted from IP address
63.105.50.19

Confirmation Number:

The confirmation number is 672427

Steers Version:

The STEERS version is 6.92

Permit Number:

The permit number is 4447

Additional Information

Application Creator: This account was created by Lisa Garcia

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Tuesday, August 19, 2025 4:15 PM
To: Alfredo Mendoza
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447
Attachments: OP-UA7 Table 3_updated 8_19_25.pdf

Alfredo,

Thank you for the detailed explanation. Please see the attached OP-UA7 Table 3 including FLARE1 per your request. I will reach out to the DARs to see if one of them will be able to certify the updates in STEERS by the end of the day tomorrow.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Monday, August 18, 2025 5:17 PM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

In response to your comments, you will need to submit a form OP-UA7, Table 3 to add 40 CFR Part 60, Subpart A applicable requirements to FLARE1. Please submit this form as soon as possible, preferably no later than **August 20, 2025**. Regarding adding NSPS OOOOb for the flare, flares are not affected facilities as listed in 40 CFR §60.5365b which is why the TCEQ will not place Subpart OOOOb on the OP-UA7 unit attribute form for flares. Flare and other control device requirements listed in §60.5412b, §60.5413b, and §60.5417b are used to demonstrate compliance with emission limits for the affected facilities described in §60.5365b which is why they are not considered separate emission units. It would be even more confusing to add a separate Subpart OOOOb line item in the Title V permit when it will be removed at the next permit renewal (or revision) once the forms and flowcharts are developed.

It is fine that you included the Subpart OOOOb flare requirements on the OP-REQ3 for providing the enforceable requirements for the TCEQ regional office in case they conduct a Title V permit compliance investigation and also for identifying the requirements for the site's operational staff on the records and reports that are required to be kept and submitted, however this will not go directly in the draft permit. I have also seen GOP applications where applicants are including Subpart OOOOb requirements for flares, however we will not be including flare requirements as a separate line in the oil and gas GOP requirement tables for Subpart OOOOb. For consistency purposes, FLARE1 will not be added to the Applicable Requirement Summary table for Subpart OOOOb.

The draft permit has been peer reviewed and one thing I missed that I will add back was the missing Permit Shield Special Term and Condition. The previous reviewer either missed this or did not enter the OP-REQ1 in our permit database correctly regarding the request for a permit shield table which is why Special Term and Condition 16 relating to permit shields is missing in the draft that I sent you.

I will ask that you certify the OP-UA7 and any other updates that have been submitted that have not yet been certified. It is preferable that you certify the updates via STEERS. You can submit an electronic copy of the OP-CRO1 if you do not certify the updates in STEERS, however you will have to mail a hardcopy of the OP-CRO1 if you choose that option.

Please let me know if you have any questions.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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<https://www.tceq.texas.gov/customersurvey>

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Tuesday, August 12, 2025 9:05 AM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Alfredo,

I have a couple of comments/questions on the draft permit. See the attached file with my comments added. Please let me know if it would be helpful to discuss the comment regarding FLARE1.

To answer your questions below, you are correct that the 0.29 g/hp-hr CO emission specification is from the Standard Permit representation. I have attached the catalyst spec sheet from the Standard Permit application that shows 0.22 g/hp-hr as the controlled CO emission rate. For conservatism and to allow for potential catalyst degradation, we added a 30% safety factor to this value which results in 0.29 g/hp-hr.

Regarding the justification to use the same CO emission rate as a surrogate for formaldehyde, per 40 CFR 63, Subpart ZZZZ, EPA allows CO emissions to be used as a surrogate for formaldehyde emissions. From the proposed rule published 12/19/2002: "In this case, we found that there is a good relationship between CO emissions reductions and HAP emissions reductions from 2SLB and 4SLB stationary RICE and CI stationary RICE equipped with oxidation catalyst systems. When CO emissions are reduced, HAP emissions are reduced in a relatively proportional manner. As a result,

CO emissions reductions can serve as a surrogate for HAP emissions reductions for 2SLB and 4SLB stationary RICE and CI stationary RICE operating with oxidation catalyst systems.”

Also, regarding my previous question about the new RO, I was informed that an OP-CRO2 will be submitted for multiple sites that were previously under this RO once the new RO has been named, so for this application, I will have the DAR certify the updates in STEERS once we have finalized the comments/questions that I provided in the attached draft.

Thank you.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Sent: Monday, August 11, 2025 11:48 AM

To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

I have attached an updated working draft permit to correct the CAM deviation limits for GRP-ENG for CO and Formaldehyde. Can you provide a technical justification for the updated CO emission rate of 0.29 g/hp-hr? I assume that this is the emission rate for the allowable maximum emission limits in the Standard Permit registration. I need documentation for the permit file in case EPA or the public have questions on the updated deviation limit. Additionally, can you provide technical justification for using the same CO emission rate as a surrogate for formaldehyde? Please note that I updated the CO Test Method to Test Method 10 rather than the Test Method 7E or 20 that you had in the OP-MON as those are NOx test methods and the current permit also references Test Method 10.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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<https://www.tceq.texas.gov/customersurvey>

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

Sent: Monday, August 11, 2025 9:03 AM

To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Thank you, Alfredo. I will review the draft permit and let you know if I have any additional comments. I do have a question about certifying the updates since the previous RO (Toby Clark) is no longer with the company. I have been informed that a new RO will be named at some point next week, but in the meantime, we do not know who will fill this role. Once this decision has been made, will we be able to have the new RO certify the OP-CRO1 or will there be any additional steps needed to update the application?

I do not think we have a DAR designated for this site, so I assume we will have to wait for the new RO to be in place before we can certify the updates, but please let me know if there is another way to handle this.

Thank you.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering

E&C Environmental

Energy Transfer

O: 713.989.7762

M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Sent: Friday, August 8, 2025 5:12 PM

To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

Sorry for the delay. I have made the update to the draft permit to add C-4 to GRP-ENG and to update the GRP-ENG NSPS JJJJ requirements based on the updated OP-UA2 form. Please review the updated draft permit that I have attached. If you have no further comments, please certify the application form updates submitted on May 9, 2025 as soon as possible as I will be sending the permit for management review next week. I will need the OP-CRO1 or you may certify the updates via STEERS before I can send the permit to public announcement/EPA review.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist

TCEQ Air Permits Division

Operating Permits Section

ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, May 9, 2025 3:52 PM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Alfredo,
Thank you for the information. Please see the attached OP-UA2 for GRP-ENG.

Per your previous request, I have attached an updated OP-1. I am fine with the NSPS OOOOb requirements being listed as you indicated.

Once you have updated the draft permit accordingly for C-4 and GRP-ENG, could I please review a revised draft prior to moving to the final certification step?

Thank you, and please let me know if you need anything else from me at this point.

Lisa M. Garcia, P.E.
Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Friday, May 9, 2025 3:13 PM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: Re: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

All attributes should be updated on the OP-UA2 under the GRP-ENG group ID if all engines are non-certified. I will be able to add C-4 to GRP-ENG if all attributes are now the same.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, May 9, 2025 3:10 PM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: FW: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Hi, Alfredo. I wanted to follow up on the email below since I did not hear back from you yet. Can you please let me know what the best approach is to address the situation that I mentioned in my email below?

Thank you.

Lisa M. Garcia, P.E.
Sr. Manager – Engineering

E&C Environmental

Energy Transfer

O: 713.989.7762

M: 210.540.8853



From: Garcia, Lisa M
Sent: Tuesday, May 6, 2025 11:21 AM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Alfredo,

I was able to confirm with our compliance team that all of the engines at the site should be treated as “non-certified” units for purposes of NSPS JJJJ. Therefore, the OP-UA2 form was correct for C-4, but should be updated for the existing units in GRP-ENG. In order to address this, should I complete an updated OP-UA2 for GRP-ENG, or are there additional steps needed to allow for all engines to be represented as “non-certified” in GRP-ENG, including the new unit (C-4)?

Thank you for your assistance with this.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering

E&C Environmental

Energy Transfer

O: 713.989.7762

M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Monday, April 21, 2025 12:36 PM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

I have completed my review of the minor revision application submitted for the Grey Wolf Gas Plant. I have created a working draft permit based on the revision application which is attached for your review.

- All 40 CFR Part 60, Subpart OOOOb requirements were listed in the permit at a high-level in the Applicable Requirement Summary table as TCEQ has not developed the application forms for this regulation. If you wish the low-level citations from the OP-REQ3 to be listed in the permit, please let me know as some of the requirements seemed to be too generic especially with respect to the requirements listed for unit FUG. Unit FLARE was not listed as a separate unit for 40 CFR Part 60, Subpart OOOOb as we do not usually split the control device requirements separately from the emission unit being controlled as 40 CFR Part OOOOb will not be listed on form OP-UA7 for flares similar to why 40 CFR Part OOOO and OOOOa also do not appear on OP-UA7. When the forms and flowchart for 40 CFR Part OOOOb are developed, the flare requirements will appear in the permit for the unit that is being controlled (for example – the flare requirements would appear in the GRP-COND row if the flare is used for control of the condensate tanks).
- Please note that I could not add emission unit C-4 to existing emission unit group GRP-ENG as listed on the OP-SUMR. The reason is that the unit attributes submitted for C-4 for 40 CFR Part 60, Subpart JJJJ are different than those that were previously submitted on the OP-UA2 for GRP-ENG. The primary difference is that the Certified attribute on page 9 of the OP-UA2 was answered NO while this was answered YES for GRP-ENG. This changes that applicable requirements for unit C-4, therefore it can not be part of GRP-ENG. If this was done in error, please resubmit OP-UA2 as appropriate. If C-4 has different attributes than the existing group, then the group name should be removed for this unit on the OP-SUMR. If C-4 was meant to inherit the same requirement as the existing GRP-ENG, then emission unit C-4 should not have been added to the OP-UA2 at all as it would inherit the same attributes (previously submitted) for GRP-ENG.
- Related to the above note, I did not add separate CAM tables for C-4 as it was unclear whether this unit is part of GRP-ENG. If C-4 was meant to be part of GRP-ENG, then unit C-4 will not be added to the CAM tables separately. If C-4 is separate from GRP-ENG due to different unit attributes, then I will add separate CAM tables for unit C-4.
- Please submit form OP-1 to formally update the technical contact with your information to replace the previous OP-1 that has Hahn Duong listed as technical contact.

Please submit any comments and application updates to address the above issues by **May 2, 2025**. I will review the updated forms and ask for them to be certified after we agree that no further changes are required to the draft permit, and I determine no further form updates are necessary. You may certify the updates either via STEERS (preferable) or via hardcopy mail which will also require a hardcopy of the OP-CRO1 form.

If you have any questions on the items listed above or with the contents of the working draft permit, please let me know.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

Texas Commission on Environmental Quality

Flare Attributes

Form OP-UA7 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 and 61 (40 CFR Part 60 and 40 CFR Part 61)

Subpart A: General Provisions of Standards of Performance for New Stationary Sources and National Emission Standards for Hazardous Air Pollutants

Date	Permit No.:	Regulated Entity No.
8/19/2025	04447	RN111436614

Unit ID No.	SOP/GOP Index No.	Subject to 40 CFR §60.18	Adhering to Heat Content Specifications	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
FLARE2	60A	NO				
FLARE1	60A	YES	YES	AIR		

From: Alfredo Mendoza
Sent: Monday, August 18, 2025 5:17 PM
To: Garcia, Lisa M
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

In response to your comments, you will need to submit a form OP-UA7, Table 3 to add 40 CFR Part 60, Subpart A applicable requirements to FLARE1. Please submit this form as soon as possible, preferably no later than **August 20, 2025**. Regarding adding NSPS OOOOb for the flare, flares are not affected facilities as listed in 40 CFR §60.5365b which is why the TCEQ will not place Subpart OOOOb on the OP-UA7 unit attribute form for flares. Flare and other control device requirements listed in §60.5412b, §60.5413b, and §60.5417b are used to demonstrate compliance with emission limits for the affected facilities described in §60.5365b which is why they are not considered separate emission units. It would be even more confusing to add a separate Subpart OOOOb line item in the Title V permit when it will be removed at the next permit renewal (or revision) once the forms and flowcharts are developed.

It is fine that you included the Subpart OOOOb flare requirements on the OP-REQ3 for providing the enforceable requirements for the TCEQ regional office in case they conduct a Title V permit compliance investigation and also for identifying the requirements for the site's operational staff on the records and reports that are required to be kept and submitted, however this will not go directly in the draft permit. I have also seen GOP applications where applicants are including Subpart OOOOb requirements for flares, however we will not be including flare requirements as a separate line in the oil and gas GOP requirement tables for Subpart OOOOb. For consistency purposes, FLARE1 will not be added to the Applicable Requirement Summary table for Subpart OOOOb.

The draft permit has been peer reviewed and one thing I missed that I will add back was the missing Permit Shield Special Term and Condition. The previous reviewer either missed this or did not enter the OP-REQ1 in our permit database correctly regarding the request for a permit shield table which is why Special Term and Condition 16 relating to permit shields is missing in the draft that I sent you.

I will ask that you certify the OP-UA7 and any other updates that have been submitted that have not yet been certified. It is preferable that you certify the updates via STEERS. You can submit an electronic copy of the OP-CRO1 if you do not certify the updates in STEERS, however you will have to mail a hardcopy of the OP-CRO1 if you choose that option.

Please let me know if you have any questions.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Tuesday, August 12, 2025 9:05 AM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

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M: 210.540.8853



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E&C Environmental

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From: Garcia, Lisa M

Sent: Tuesday, May 6, 2025 11:21 AM

To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

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Thank you for your assistance with this.

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From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Sent: Monday, April 21, 2025 12:36 PM

To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

Subject: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit 04447

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I have completed my review of the minor revision application submitted for the Grey Wolf Gas Plant. I have created a working draft permit based on the revision application which is attached for your review.

- All 40 CFR Part 60, Subpart OOOOb requirements were listed in the permit at a high-level in the Applicable Requirement Summary table as TCEQ has not developed the application forms for this regulation. If you wish the low-level citations from the OP-REQ3 to be listed in the permit, please let me know as some of the requirements seemed to be too generic especially with respect to the requirements listed for unit FUG. Unit FLARE was not listed as a separate unit for 40 CFR Part 60, Subpart OOOOb as we do not usually split the control device requirements separately from the emission unit being controlled as 40 CFR Part OOOOb will not be listed on form OP-UA7 for flares similar to why 40 CFR Part OOOO and OOOOa also do not appear on OP-UA7. When the forms and flowchart for 40 CFR Part OOOOb are developed, the flare requirements will appear in the permit for the unit that is being controlled (for example – the flare

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- Please submit form OP-1 to formally update the technical contact with your information to replace the previous OP-1 that has Hahn Duong listed as technical contact.

Please submit any comments and application updates to address the above issues by **May 2, 2025**. I will review the updated forms and ask for them to be certified after we agree that no further changes are required to the draft permit, and I determine no further form updates are necessary. You may certify the updates either via STEERS (preferable) or via hardcopy mail which will also require a hardcopy of the OP-CRO1 form.

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Sent: Tuesday, August 12, 2025 9:05 AM
To: Alfredo Mendoza
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447
Attachments: Catalyst Spec Sheet.pdf; SOP - O4447 ET Gathering Processing LLC (Minor 37118) Draft_ET comments.docx

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General Terms and Conditions

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

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

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

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

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

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
 - E. Emission units subject to 40 CFR Part 63, Subparts HH and ZZZZ, as identified in the attached Applicable Requirements Summary table, are subject to 30 TAC Chapter 113,

Subchapter C, §113.390 and §113.1090, respectively, which incorporates the 40 CFR Part 63 Subpart by reference.

2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
 - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
 - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that

does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

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

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

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

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

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A).
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- E. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
 - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (iii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (iv) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)

- 4. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:

- A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
 - B. Title 40 CFR § 60.8 (relating to Performance Tests)
 - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
 - D. Title 40 CFR § 60.12 (relating to Circumvention)
 - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
 - F. Title 40 CFR § 60.14 (relating to Modification)
 - G. Title 40 CFR § 60.15 (relating to Reconstruction)
 - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
6. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
- A. Title 40 CFR § 63.760(c) (relating to Applicability and Designation of Affected Source)

Additional Monitoring Requirements

7. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached "CAM Summary" upon issuance of the permit. In addition, the permit holder shall comply with the following:
- A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
 - B. The permit holder shall report, consistent with the averaging time identified in the "CAM Summary," deviations as defined by the deviation limit in the "CAM Summary." Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
 - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "CAM Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
 - D. The permit holder shall operate the monitoring, identified in the attached "CAM Summary," in accordance with the provisions of 40 CFR § 64.7.

- E. The permit holder shall comply with either of the following requirements for any capture system associated with the VOC control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions:
- (i) Once a year the permit holder shall inspect the capture system in compliance of CAM for leaks in accordance with 40 CFR Part 60, Appendix A, Test Method 21. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppm above background or as defined by the underlying applicable requirement; or
 - (ii) Once a month, the permit holder shall conduct a visual, audible, and/or olfactory inspection of the capture system in compliance of CAM to detect leaking components.
- F. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to detect leaking components for any capture system associated with the control device subject to CAM. If the results of the inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions.
- G. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

New Source Review Authorization Requirements

8. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated January 7, 2025 in the application for project 37118), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
- A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
9. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
10. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating

noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

11. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
 - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
 - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
 - C. Applicable requirements of 30 TAC § 116.620 for Installation and/or Modification of Oil and Gas Facilities based on the information contained in the registration application.

Compliance Requirements

12. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
13. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Protection of Stratospheric Ozone

14. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
 - A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

Permit Location

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

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary..... 12

Applicable Requirements Summary 14

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

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
COMP-4	Fugitive Emission Units	N/A	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
DEHY	Glycol Dehydration	N/A	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
DEHY	Glycol Dehydration	N/A	63HH	40 CFR Part 63, Subpart HH	No changing attributes.
FLARE1	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FLARE2	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FLARE3	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FUG	Fugitive Emission Units	N/A	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
GRP-COMP	Fugitive Emission Units	COMP-1, COMP-2, COMP-3, COMPVRU-1, COMPVRU-2	600000a	40 CFR Part 60, Subpart 0000a	No changing attributes.
GRP-COND	Storage Tanks/Vessels	T-2, T-3, T-4, T-5	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	60JJJJ	40 CFR Part 60, Subpart JJJJ	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	63ZZZZ	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
HMO-HTR	Boilers/Steam Generators/Steam Generating Units	N/A	60Dc-01	40 CFR Part 60, Subpart Dc	No changing attributes.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
HMO-HTR2	Boilers/Steam Generators/Steam Generating Units	N/A	60Dc-02	40 CFR Part 60, Subpart Dc	No changing attributes.
LOAD2	Miscellaneous Units	N/A	N/A	30 TAC Chapter 116, Standard Permits	No changing attributes.
PRO-AMINE	Gas Sweetening/Sulfur Recovery Units	N/A	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
PRO-AMINE	Gas Sweetening/Sulfur Recovery Units	N/A	60OOOOa-0002	40 CFR Part 60, Subpart OOOOa	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
COMP-4	EU	60000Ob	§111 Pollutant	40 CFR Part 60, Subpart 0000b	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 0000b
DEHY	EU	168018	112(B) HAPS	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
DEHY	EU	168018	VOC	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
DEHY	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.764(e)(1)(ii) § 63.764(a) § 63.764(e)(1) § 63.764(j) § 63.775(c)(8)	The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.	[G]§ 63.772(b)(2)	§ 63.774(d)(1) § 63.774(d)(1)(ii)	None
FLARE1	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None

Commented [LG1]: Is this correct or should it list VOC?

Commented [LG2]: FLARE1 is subject to NSPS 0000b and is therefore subject to 40 CFR 60.18. I would like to request an additional line item for FLARE1 listing 60.18 and another line item listing NSPS 0000b since the flare will have specific requirements under 0000b. I know that you previously mentioned that once a flowchart is developed, the requirements for the flare will be listed under the source that they are controlling (i.e. tanks), but I believe that will cause confusion since 0000b has much more detailed specific flare requirements compared to 0000 and 0000a.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
FLARE2	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FLARE3	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FUG	EU	600000b	§111 Pollutant	40 CFR Part 60, Subpart OOOOb	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart OOOOb
GRP-COMP	EU	600000a	VOC	40 CFR Part 60, Subpart OOOOa	§ 60.5385a(a)(2) § 60.5370a(a) § 60.5370a(b) § 60.5385a § 60.5385a(a) § 60.5385a(b) § 60.5385a(c) § 60.5385a(d) § 60.5410a § 60.5415a(c) § 60.5415a(c)(2) § 60.5415a(c)(3)	For each reciprocating compressor you must replace the rod packing prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.	§ 60.5410a(c)(1) § 60.5415a(c)(1)	§ 60.5410a(c)(4) § 60.5420a(c) [G]§ 60.5420a(c)(3)	§ 60.5410a(c)(3) § 60.5420a(a) § 60.5420a(a)(1) § 60.5420a(b) [G]§ 60.5420a(b)(1) § 60.5420a(b)(11) [G]§ 60.5420a(b)(13) [G]§ 60.5420a(b)(14) [G]§ 60.5420a(b)(4)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-COND	EU	60000Ob	§111 Pollutant	40 CFR Part 60, Subpart 000Ob	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 000Ob
GRP-ENG	EU	168018	CO	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
GRP-ENG	EU	168018	FORMALD EHYDE	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
GRP-ENG	EU	60JJJJ	CO	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(e)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)
GRP-ENG	EU	60JJJJ	NO _x	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NO _x emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(d)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-ENG	EU	60JJJJ	VOC	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(f) § 60.4244(g)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)
GRP-ENG	EU	63ZZZZ	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
HMO-HTR	EU	60Dc-01	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
HMO-HTR	EU	60Dc-01	PM (Opacity)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR	EU	60Dc-01	SO ₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	PM (Opacity)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	SO ₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
LOAD2	EU	N/A	VOC	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	PRO	168018	112(B) HAPS	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	PRO	168018	VOC	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	EU	600000a-0002	SO ₂	40 CFR Part 60, Subpart 0000a	§ 60.5365a(g)(3) § 60.5370a(b)	Owners or operators of facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H ₂ S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423a(c), but are not required to comply with §§60.5405a through 60.5407a and §§60.5410a(g) and 60.5415a(g).	None	§ 60.5423a(c)	§ 60.5420a(a) § 60.5420a(a)(1)

Additional Monitoring Requirements

Compliance Assurance Monitoring Summary 21

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: CO	Main Standard: 168018
Monitoring Information	
Indicator: CO concentration	
Minimum Frequency: Every 15,000 hours of operation	
Averaging Period: N/A	
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO	
CAM Text: Use Reference Method 10 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A-100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: CO	Main Standard: 168018
Monitoring Information	
Indicator: Inlet flue gas temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Minimum inlet flue gas temperature shall not be below 550 degrees F. Maximum inlet flue gas temperature shall not exceed 1250 degrees F.	
CAM Text: The monitoring device should be installed to record the inlet flue gas temperature to the catalyst. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 2% of reading; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: FORMALDEHYDE	Main Standard: 168018
Monitoring Information	
Indicator: CO concentration (as a surrogate for CH ₂ O)	
Minimum Frequency: Every 15,000 hours of operation	
Averaging Period: N/A	
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO (as a surrogate for CH ₂ O)	
CAM Text: Use Reference Method 10 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A-100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: FORMALDEHYDE	Main Standard: 168018
Monitoring Information	
Indicator: Inlet flue gas temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Minimum inlet flue gas temperature shall not be below 550 degrees F. Maximum inlet flue gas temperature shall not exceed 1250 degrees F.	
CAM Text: The monitoring device should be installed to record the inlet flue gas temperature to the catalyst. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 2% of reading; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: LOAD2	
Control Device ID No.: FLARE3	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: N/A
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

Permit Shield

Permit Shield	35
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Permit Shield

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
FLARE1	N/A	40 CFR Part 60, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Parts 60 and 61.
FLARE1	N/A	40 CFR Part 63, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Part 63.
FLARE3	N/A	40 CFR Part 60, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Parts 60 and 61.
FLARE3	N/A	40 CFR Part 63, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Part 63.
GRP-COND	T-2, T-3, T-4, T-5	40 CFR Part 60, Subpart Kb	Storage vessel design capacity less than or equal to 1,589.874 m ³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.
GRP-COND	T-2, T-3, T-4, T-5	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.
GRP-MISC	TK-AF1, TK-AF2, TK-AM, TK-GL, TK-LO1, TK-LO2, TK-ML1, TK-ML2	40 CFR Part 60, Subpart Kb	Storage vessel capacity less than 75 m ³ .
GRP-MISC	TK-AF1, TK-AF2, TK-AM, TK-GL, TK-LO1, TK-LO2, TK-ML1, TK-ML2	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.
PRO-AMINE	N/A	30 TAC Chapter 112, Sulfur Compounds	Gas sweetening unit does not use sulfur recovery.
T-1	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity greater than or equal to 75 m ³ but less than 151 m ³ storing a liquid with a maximum TVP less than 15.0 kPa.
T-1	N/A	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.

New Source Review Authorization References

New Source Review Authorization References 37

New Source Review Authorization References by Emission Unit 38

New Source Review Authorization References

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

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 168018	Issuance Date: 03/05/2025
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.359	Version No./Date: 09/10/2013

New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
C-1	Residue Compressor Engine 1	168018
C-2	Residue Compressor Engine 2	168018
C-3	Residue Compressor Engine 3	168018
C-4	Residue Compressor Engine	168018
COMP-1	Reciprocating Residue Compressor 1	168018
COMP-2	Reciprocating Residue Compressor 2	168018
COMP-3	Reciprocating Residue Compressor 3	168018
COMP-4	Reciprocating Residue Compressor	168018
COMPVRU-1	Reciprocating VRU Compressor 1	168018
COMPVRU-2	Reciprocating VRU Compressor 2	168018
DEHY	TEG Dehydration Unit	168018
FLARE1	Plant Flare	168018, 106.359/09/10/2013
FLARE2	Acid Gas Flare	168018
FLARE3	Truck Loading Flare	168018
FUG	Site Fugitives	168018
HMO-HTR	Hot Oil System Heater 1	168018
HMO-HTR2	Hot Oil System Heater 2	168018
LOAD2	Truck Loading Stabilized Condensate	168018
PRO-AMINE	Amine Sweetening Unit	168018
T-1	Slop Oil Tank	168018
T-2	Stabilized Condensate Tank 1	168018, 106.359/09/10/2013

New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
T-3	Stabilized Condensate Tank 2	168018, 106.359/09/10/2013
T-4	Stabilized Condensate Tank 3	168018, 106.359/09/10/2013
T-5	Stabilized Condensate Tank 4	168018, 106.359/09/10/2013
TK-AF1	Antifreeze Tank	168018
TK-AF2	Antifreeze Tank	168018
TK-AM	Amine Tank	168018
TK-GL	Glycol Tank	168018
TK-LO1	Lube Oil Tank	168018
TK-LO2	Lube Oil Tank	168018
TK-ML1	Methanol Tank	168018
TK-ML2	Methanol Tank	168018

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

Appendix A

Acronym List 41

Acronym List

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

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

Equipment Specification

Proposal Information

Proposal Number: JB-21-008116 Rev(6)
Project Reference: SEC - ETC WTX - 3616 A4

Date: **3/19/2024**

Engine Information

Engine Make:	Caterpillar	Speed:	Rated
Engine Model:	G 3616 A4	Power Output:	5,000 bhp
Rated Speed:	1000 RPM	Exhaust Flow Rate:	30,700 acfm (cfm)
Fuel Description:	Natural Gas	Exhaust Temperature:	840 ° F
Hours Of Operation:	8760 Hours per year	Fuel Consumption:	6,689 btu/bhp-hr
Load:	100%	O ₂ :	11.2%
		H ₂ O:	17%

Emission Data (100% Load)

Emission	Raw Engine Emissions						Target Outlet Emissions						Calculated Reduction
	g/bhp-hr	tons/yr	ppmvd @ 15% O ₂	ppmvd	g/kW-hr	lb/MW-hr	g/bhp-hr	tons/yr	ppmvd @ 15% O ₂	ppmvd	g/kW-hr	lb/MW-hr	
NO _x *	0.5	24.14	45	74	0.671	1.48							
CO	2.2	106.22	327	537	2.95	6.5	0.22	10.62	33	54	0.295	0.65	90%
NMNEHC**	0.25	12.07	65	107	0.335	0.74	0.14	6.64	36	59	0.184	0.41	45%
CH ₂ O	0.14	6.76	19	32	0.188	0.41	0.02	1.15	3	5	0.032	0.07	83%

System Specifications

Oxidation (SP-PTH-72-22010087)

Design Exhaust Flow Rate:	30700 acfm (cfm)
Design Exhaust Temperature:	840°F
Housing Model Number:	SP-PTH-72-22010087-HSG
Element Model Number:	MECB-OX-SB4000-2421-3600-291, MEC-BK-XX-2421-4000-291
Number of Catalyst Elements:	3
Number of Spare Catalyst Tracks:	1
Sound Attenuation:	30-35 dBA insertion loss
Exhaust Temperature Limits***:	550 – 1250°F (catalyst inlet); 1350°F (catalyst outlet) 288 – 677°C (catalyst inlet); 732°C (catalyst outlet)
System Pressure Loss:	5.0 inH ₂ O (Clean)

* MW referenced as NO₂

** MW referenced as CH₄. Propane in the exhaust shall not exceed 15% by volume of the NMHC compounds in the exhaust, excluding aldehydes. The 15% (vol.) shall be established on a wet basis, reported on a methane molecular weight basis. The measurement of exhaust NMHC composition shall be based upon EPA method 320 (FTIR), and shall exclude formaldehyde.

*** General catalyst temperature operating range. Performance is based on the Design Exhaust Temperature.

From: Alfredo Mendoza
Sent: Friday, August 8, 2025 5:12 PM
To: Garcia, Lisa M
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447
Attachments: revised working draft permit O4447.docx

Lisa,

Sorry for the delay. I have made the update to the draft permit to add C-4 to GRP-ENG and to update the GRP-ENG NSPS JJJJ requirements based on the updated OP-UA2 form. Please review the updated draft permit that I have attached. If you have no further comments, please certify the application form updates submitted on May 9, 2025 as soon as possible as I will be sending the permit for management review next week. I will need the OP-CRO1 or you may certify the updates via STEERS before I can send the permit to public announcement/EPA review.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, May 9, 2025 3:52 PM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Alfredo,

Thank you for the information. Please see the attached OP-UA2 for GRP-ENG.

Per your previous request, I have attached an updated OP-1. I am fine with the NSPS OOOOb requirements being listed as you indicated.

Once you have updated the draft permit accordingly for C-4 and GRP-ENG, could I please review a revised draft prior to moving to the final certification step?

Thank you, and please let me know if you need anything else from me at this point.

Lisa M. Garcia, P.E.
Sr. Manager – Engineering
E&C Environmental

Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Friday, May 9, 2025 3:13 PM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: Re: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

All attributes should be updated on the OP-UA2 under the GRP-ENG group ID if all engines are non-certified. I will be able to add C-4 to GRP-ENG if all attributes are now the same.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, May 9, 2025 3:10 PM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: FW: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Hi, Alfredo. I wanted to follow up on the email below since I did not hear back from you yet. Can you please let me know what the best approach is to address the situation that I mentioned in my email below?

Thank you.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering

E&C Environmental

Energy Transfer

O: 713.989.7762

M: 210.540.8853



From: Garcia, Lisa M

Sent: Tuesday, May 6, 2025 11:21 AM

To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Alfredo,

I was able to confirm with our compliance team that all of the engines at the site should be treated as “non-certified” units for purposes of NSPS JJJJ. Therefore, the OP-UA2 form was correct for C-4, but should be updated for the existing units in GRP-ENG. In order to address this, should I complete an updated OP-UA2 for GRP-ENG, or are there additional steps needed to allow for all engines to be represented as “non-certified” in GRP-ENG, including the new unit (C-4)?

Thank you for your assistance with this.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering

E&C Environmental

Energy Transfer

O: 713.989.7762

M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Sent: Monday, April 21, 2025 12:36 PM

To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

Subject: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit 04447

Lisa,

I have completed my review of the minor revision application submitted for the Grey Wolf Gas Plant. I have created a working draft permit based on the revision application which is attached for your review.

- All 40 CFR Part 60, Subpart OOOOb requirements were listed in the permit at a high-level in the Applicable Requirement Summary table as TCEQ has not developed the application forms for this regulation. If you wish the low-level citations from the OP-REQ3 to be listed in the permit, please let me know as some of the requirements seemed to be too generic especially with respect to the requirements listed for unit FUG. Unit FLARE was not listed as a separate unit for 40 CFR Part 60, Subpart OOOOb as we do not usually split the control device requirements separately from the emission unit being controlled as 40 CFR Part OOOOb will not be listed on form OP-UA7 for flares similar to why 40 CFR Part OOOO and OOOOa also do not appear on OP-UA7. When the forms and flowchart for 40 CFR Part OOOOb are developed, the flare requirements will appear in the permit for the unit that is being controlled (for example – the flare requirements would appear in the GRP-COND row if the flare is used for control of the condensate tanks).
- Please note that I could not add emission unit C-4 to existing emission unit group GRP-ENG as listed on the OP-SUMR. The reason is that the unit attributes submitted for C-4 for 40 CFR Part 60, Subpart JJJJ are different than those that were previously submitted on the OP-UA2 for GRP-ENG. The primary difference is that the Certified attribute on page 9 of the OP-UA2 was answered NO while this was answered YES for GRP-ENG. This changes that applicable requirements for unit C-4, therefore it can not be part of GRP-ENG. If this was done in error, please resubmit OP-UA2 as appropriate. If C-4 has different attributes than the existing group, then the group name should be removed for

this unit on the OP-SUMR. If C-4 was meant to inherit the same requirement as the existing GRP-ENG, then emission unit C-4 should not have been added to the OP-UA2 at all as it would inherit the same attributes (previously submitted) for GRP-ENG.

- Related to the above note, I did not add separate CAM tables for C-4 as it was unclear whether this unit is part of GRP-ENG. If C-4 was meant to be part of GRP-ENG, then unit C-4 will not be added to the CAM tables separately. If C-4 is separate from GRP-ENG due to different unit attributes, then I will add separate CAM tables for unit C-4.
- Please submit form OP-1 to formally update the technical contact with your information to replace the previous OP-1 that has Hahn Duong listed as technical contact.

Please submit any comments and application updates to address the above issues by **May 2, 2025**. I will review the updated forms and ask for them to be certified after we agree that no further changes are required to the draft permit, and I determine no further form updates are necessary. You may certify the updates either via STEERS (preferable) or via hardcopy mail which will also require a hardcopy of the OP-CRO1 form.

If you have any questions on the items listed above or with the contents of the working draft permit, please let me know.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

FEDERAL OPERATING PERMIT

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

AUTHORIZING THE OPERATION OF
Grey Wolf Gas Plant
Natural Gas Extraction

LOCATED AT
Winkler County, Texas
Latitude 31° 47' 42" Longitude 103° 15' 31"
Regulated Entity Number: RN111436614

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

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

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

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

Permit No: 04447 Issuance Date: _____

For the Commission

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General Terms and Conditions

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

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

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

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

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

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
 - E. Emission units subject to 40 CFR Part 63, Subparts HH and ZZZZ, as identified in the attached Applicable Requirements Summary table, are subject to 30 TAC Chapter 113,

Subchapter C, §113.390 and §113.1090, respectively, which incorporates the 40 CFR Part 63 Subpart by reference.

2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
 - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
 - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that

does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

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

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

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

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

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

- (4) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
 - C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
 - D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
 - E. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
 - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (iii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (iv) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)
4. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:

- A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
 - B. Title 40 CFR § 60.8 (relating to Performance Tests)
 - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
 - D. Title 40 CFR § 60.12 (relating to Circumvention)
 - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
 - F. Title 40 CFR § 60.14 (relating to Modification)
 - G. Title 40 CFR § 60.15 (relating to Reconstruction)
 - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
6. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
- A. Title 40 CFR § 63.760(c) (relating to Applicability and Designation of Affected Source)

Additional Monitoring Requirements

7. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached “CAM Summary” upon issuance of the permit. In addition, the permit holder shall comply with the following:
- A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
 - B. The permit holder shall report, consistent with the averaging time identified in the “CAM Summary,” deviations as defined by the deviation limit in the “CAM Summary.” Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
 - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the “CAM Summary,” for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
 - D. The permit holder shall operate the monitoring, identified in the attached “CAM Summary,” in accordance with the provisions of 40 CFR § 64.7.

- E. The permit holder shall comply with either of the following requirements for any capture system associated with the VOC control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions:
 - (i) Once a year the permit holder shall inspect the capture system in compliance of CAM for leaks in accordance with 40 CFR Part 60, Appendix A, Test Method 21. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppm above background or as defined by the underlying applicable requirement; or
 - (ii) Once a month, the permit holder shall conduct a visual, audible, and/or olfactory inspection of the capture system in compliance of CAM to detect leaking components.
- F. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to detect leaking components for any capture system associated with the control device subject to CAM. If the results of the inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions.
- G. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

New Source Review Authorization Requirements

- 8. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated January 7, 2025 in the application for project 37118), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
- 9. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 10. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating

noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

11. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
 - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
 - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
 - C. Applicable requirements of 30 TAC § 116.620 for Installation and/or Modification of Oil and Gas Facilities based on the information contained in the registration application.

Compliance Requirements

12. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
13. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Protection of Stratospheric Ozone

14. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
 - A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

Permit Location

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

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary	12
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Applicable Requirements Summary	14
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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
COMP-4	Fugitive Emission Units	N/A	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
DEHY	Glycol Dehydration	N/A	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
DEHY	Glycol Dehydration	N/A	63HH	40 CFR Part 63, Subpart HH	No changing attributes.
FLARE1	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FLARE2	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FLARE3	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FUG	Fugitive Emission Units	N/A	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
GRP-COMP	Fugitive Emission Units	COMP-1, COMP-2, COMP-3, COMPVRU-1, COMPVRU-2	600000a	40 CFR Part 60, Subpart 0000a	No changing attributes.
GRP-COND	Storage Tanks/Vessels	T-2, T-3, T-4, T-5	600000b	40 CFR Part 60, Subpart 0000b	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	60JJJJ	40 CFR Part 60, Subpart JJJJ	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3, C-4	63ZZZZ	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
HMO-HTR	Boilers/Steam Generators/Steam Generating Units	N/A	60Dc-01	40 CFR Part 60, Subpart Dc	No changing attributes.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
HMO-HTR2	Boilers/Steam Generators/Steam Generating Units	N/A	60Dc-02	40 CFR Part 60, Subpart Dc	No changing attributes.
LOAD2	Miscellaneous Units	N/A	N/A	30 TAC Chapter 116, Standard Permits	No changing attributes.
PRO-AMINE	Gas Sweetening/Sulfur Recovery Units	N/A	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
PRO-AMINE	Gas Sweetening/Sulfur Recovery Units	N/A	60OOOOa-0002	40 CFR Part 60, Subpart OOOOa	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
COMP-4	EU	60000Ob	§111 Pollutant	40 CFR Part 60, Subpart 000Ob	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 000Ob
DEHY	EU	168018	112(B) HAPS	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
DEHY	EU	168018	VOC	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
DEHY	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.764(e)(1)(ii) § 63.764(a) § 63.764(e)(1) § 63.764(j) § 63.775(c)(8)	The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.	[G]§ 63.772(b)(2)	§ 63.774(d)(1) § 63.774(d)(1)(ii)	None
FLARE1	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
FLARE2	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FLARE3	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FUG	EU	60000Ob	§111 Pollutant	40 CFR Part 60, Subpart OOOOb	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart OOOOb
GRP-COMP	EU	600000a	VOC	40 CFR Part 60, Subpart OOOOa	§ 60.5385a(a)(2) § 60.5370a(a) § 60.5370a(b) § 60.5385a § 60.5385a(a) § 60.5385a(b) § 60.5385a(c) § 60.5385a(d) § 60.5410a § 60.5415a(c) § 60.5415a(c)(2) § 60.5415a(c)(3)	For each reciprocating compressor you must replace the rod packing prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.	§ 60.5410a(c)(1) § 60.5415a(c)(1)	§ 60.5410a(c)(4) § 60.5420a(c) [G]§ 60.5420a(c)(3)	§ 60.5410a(c)(3) § 60.5420a(a) § 60.5420a(a)(1) § 60.5420a(b) [G]§ 60.5420a(b)(1) § 60.5420a(b)(11) [G]§ 60.5420a(b)(13) [G]§ 60.5420a(b)(14) [G]§ 60.5420a(b)(4)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-COND	EU	60000Ob	§111 Pollutant	40 CFR Part 60, Subpart 000Ob	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 000Ob	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 000Ob
GRP-ENG	EU	168018	CO	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
GRP-ENG	EU	168018	FORMALD EHYDE	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
GRP-ENG	EU	60JJJJ	CO	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(e)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)
GRP-ENG	EU	60JJJJ	NO _x	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NO _x emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(d)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-ENG	EU	60JJJJ	VOC	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(f) § 60.4244(g)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4) § 60.4245(j)	[G]§ 60.4245(c) § 60.4245(d) § 60.4245(f) [G]§ 60.4245(g) [G]§ 60.4245(h) [G]§ 60.4245(i)
GRP-ENG	EU	63ZZZZ	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
HMO-HTR	EU	60Dc-01	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
HMO-HTR	EU	60Dc-01	PM (Opacity)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR	EU	60Dc-01	SO ₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	PM (Opacity)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	SO ₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
LOAD2	EU	N/A	VOC	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	PRO	168018	112(B) HAPS	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	PRO	168018	VOC	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	EU	600000a-0002	SO ₂	40 CFR Part 60, Subpart OOOOa	§ 60.5365a(g)(3) § 60.5370a(b)	Owners or operators of facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H ₂ S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423a(c), but are not required to comply with §§60.5405a through 60.5407a and §§60.5410a(g) and 60.5415a(g).	None	§ 60.5423a(c)	§ 60.5420a(a) § 60.5420a(a)(1)

Additional Monitoring Requirements

Compliance Assurance Monitoring Summary 21

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: N/A	Control Device Type: N/A
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: CO	Main Standard: 168018
Monitoring Information	
Indicator: CO concentration	
Minimum Frequency: Every 15,000 hours of operation	
Averaging Period: N/A	
Deviation Limit: Maximum CO concentration shall not exceed 0.55 g/hp-hr.	
CAM Text: Use Reference Method 10 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A-100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: CO	Main Standard: 168018
Monitoring Information	
Indicator: Inlet flue gas temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Minimum inlet flue gas temperature shall not be below 550 degrees F. Maximum inlet flue gas temperature shall not exceed 1250 degrees F.	
CAM Text: The monitoring device should be installed to record the inlet flue gas temperature to the catalyst. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: “ ± 2% of reading; or “ ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: FORMALDEHYDE	Main Standard: 168018
Monitoring Information	
Indicator: CO concentration	
Minimum Frequency: Every 15,000 hours of operation	
Averaging Period: N/A	
Deviation Limit: Maximum CO concentration shall not exceed 0.55 g/hp-hr.	
CAM Text: Use Reference Method 10 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A-100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: N/A	Control Device Type: N/A
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: FORMALDEHYDE	Main Standard: 168018
Monitoring Information	
Indicator: Inlet flue gas temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Minimum inlet flue gas temperature shall not be below 550 degrees F. Maximum inlet flue gas temperature shall not exceed 1250 degrees F.	
CAM Text: The monitoring device should be installed to record the inlet flue gas temperature to the catalyst. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: “ ± 2% of reading; or “ ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: LOAD2	
Control Device ID No.: FLARE3	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: N/A
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

Permit Shield

Permit Shield 35

Permit Shield

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
FLARE1	N/A	40 CFR Part 60, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Parts 60 and 61.
FLARE1	N/A	40 CFR Part 63, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Part 63.
FLARE3	N/A	40 CFR Part 60, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Parts 60 and 61.
FLARE3	N/A	40 CFR Part 63, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Part 63.
GRP-COND	T-2, T-3, T-4, T-5	40 CFR Part 60, Subpart Kb	Storage vessel design capacity less than or equal to 1,589.874 m ³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.
GRP-COND	T-2, T-3, T-4, T-5	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.
GRP-MISC	TK-AF1, TK-AF2, TK-AM, TK-GL, TK-LO1, TK-LO2, TK-ML1, TK-ML2	40 CFR Part 60, Subpart Kb	Storage vessel capacity less than 75 m ³ .
GRP-MISC	TK-AF1, TK-AF2, TK-AM, TK-GL, TK-LO1, TK-LO2, TK-ML1, TK-ML2	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.
PRO-AMINE	N/A	30 TAC Chapter 112, Sulfur Compounds	Gas sweetening unit does not use sulfur recovery.
T-1	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity greater than or equal to 75 m ³ but less than 151 m ³ storing a liquid with a maximum TVP less than 15.0 kPa.
T-1	N/A	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.

New Source Review Authorization References

New Source Review Authorization References	37
New Source Review Authorization References by Emission Unit	38

New Source Review Authorization References

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

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 168018	Issuance Date: 03/05/2025
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.359	Version No./Date: 09/10/2013

New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
C-1	Residue Compressor Engine 1	168018
C-2	Residue Compressor Engine 2	168018
C-3	Residue Compressor Engine 3	168018
C-4	Residue Compressor Engine	168018
COMP-1	Reciprocating Residue Compressor 1	168018
COMP-2	Reciprocating Residue Compressor 2	168018
COMP-3	Reciprocating Residue Compressor 3	168018
COMP-4	Reciprocating Residue Compressor	168018
COMPVRU-1	Reciprocating VRU Compressor 1	168018
COMPVRU-2	Reciprocating VRU Compressor 2	168018
DEHY	TEG Dehydration Unit	168018
FLARE1	Plant Flare	168018, 106.359/09/10/2013
FLARE2	Acid Gas Flare	168018
FLARE3	Truck Loading Flare	168018
FUG	Site Fugitives	168018
HMO-HTR	Hot Oil System Heater 1	168018
HMO-HTR2	Hot Oil System Heater 2	168018
LOAD2	Truck Loading Stabilized Condensate	168018
PRO-AMINE	Amine Sweetening Unit	168018
T-1	Slop Oil Tank	168018
T-2	Stabilized Condensate Tank 1	168018, 106.359/09/10/2013

New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
T-3	Stabilized Condensate Tank 2	168018, 106.359/09/10/2013
T-4	Stabilized Condensate Tank 3	168018, 106.359/09/10/2013
T-5	Stabilized Condensate Tank 4	168018, 106.359/09/10/2013
TK-AF1	Antifreeze Tank	168018
TK-AF2	Antifreeze Tank	168018
TK-AM	Amine Tank	168018
TK-GL	Glycol Tank	168018
TK-LO1	Lube Oil Tank	168018
TK-LO2	Lube Oil Tank	168018
TK-ML1	Methanol Tank	168018
TK-ML2	Methanol Tank	168018

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

Appendix A

Acronym List 41

Acronym List

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

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, May 9, 2025 3:52 PM
To: Alfredo Mendoza
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447
Attachments: OP-UA2_GRP-ENG.pdf; OP-1_updated 5_9_25.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Alfredo,

Thank you for the information. Please see the attached OP-UA2 for GRP-ENG.

Per your previous request, I have attached an updated OP-1. I am fine with the NSPS OOOOb requirements being listed as you indicated.

Once you have updated the draft permit accordingly for C-4 and GRP-ENG, could I please review a revised draft prior to moving to the final certification step?

Thank you, and please let me know if you need anything else from me at this point.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Friday, May 9, 2025 3:13 PM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: Re: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

All attributes should be updated on the OP-UA2 under the GRP-ENG group ID if all engines are non-certified. I will be able to add C-4 to GRP-ENG if all attributes are now the same.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist
TCEQ Air Permits Division
Operating Permits Section

ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, May 9, 2025 3:10 PM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: FW: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Hi, Alfredo. I wanted to follow up on the email below since I did not hear back from you yet. Can you please let me know what the best approach is to address the situation that I mentioned in my email below?

Thank you.

Lisa M. Garcia, P.E.
Sr. Manager – Engineering

E&C Environmental

Energy Transfer

O: 713.989.7762

M: 210.540.8853



From: Garcia, Lisa M
Sent: Tuesday, May 6, 2025 11:21 AM

To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Alfredo,

I was able to confirm with our compliance team that all of the engines at the site should be treated as “non-certified” units for purposes of NSPS JJJJ. Therefore, the OP-UA2 form was correct for C-4, but should be updated for the existing units in GRP-ENG. In order to address this, should I complete an updated OP-UA2 for GRP-ENG, or are there additional steps needed to allow for all engines to be represented as “non-certified” in GRP-ENG, including the new unit (C-4)?

Thank you for your assistance with this.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering

E&C Environmental

Energy Transfer

O: 713.989.7762

M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>

Sent: Monday, April 21, 2025 12:36 PM

To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

Subject: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Lisa,

I have completed my review of the minor revision application submitted for the Grey Wolf Gas Plant. I have created a working draft permit based on the revision application which is attached for your review.

- All 40 CFR Part 60, Subpart OOOOb requirements were listed in the permit at a high-level in the Applicable Requirement Summary table as TCEQ has not developed the application forms for this regulation. If you wish the low-level citations from the OP-REQ3 to be listed in the permit, please let me know as some of the requirements seemed to be too generic especially with respect to the requirements listed for unit FUG. Unit FLARE was not listed as a separate unit for 40 CFR Part 60, Subpart OOOOb as we do not usually split the control device requirements separately from the emission unit being controlled as 40 CFR Part OOOOb will not be listed on form OP-UA7 for flares similar to why 40 CFR Part OOOO and OOOOa also do not appear on OP-UA7. When the forms and flowchart for 40 CFR Part OOOOb are developed, the flare requirements will appear in the permit for the unit that is being controlled (for example – the flare requirements would appear in the GRP-COND row if the flare is used for control of the condensate tanks).
- Please note that I could not add emission unit C-4 to existing emission unit group GRP-ENG as listed on the OP-SUMR. The reason is that the unit attributes submitted for C-4 for 40 CFR Part 60, Subpart JJJJ are different than those that were previously submitted on the OP-UA2 for GRP-ENG. The primary difference is that the Certified attribute on page 9 of the OP-UA2 was answered NO while this was answered YES for GRP-ENG. This changes that applicable requirements for unit C-4, therefore it can not be part of GRP-ENG. If this was done in error, please resubmit OP-UA2 as appropriate. If C-4 has different attributes than the existing group, then the group name should be removed for this unit on the OP-SUMR. If C-4 was meant to inherit the same requirement as the existing GRP-ENG, then emission unit C-4 should not have been added to the OP-UA2 at all as it would inherit the same attributes (previously submitted) for GRP-ENG.
- Related to the above note, I did not add separate CAM tables for C-4 as it was unclear whether this unit is part of GRP-ENG. If C-4 was meant to be part of GRP-ENG, then unit C-4 will not be added to the CAM tables separately. If C-4 is separate from GRP-ENG due to different unit attributes, then I will add separate CAM tables for unit C-4.
- Please submit form OP-1 to formally update the technical contact with your information to replace the previous OP-1 that has Hahn Duong listed as technical contact.

Please submit any comments and application updates to address the above issues by **May 2, 2025**. I will review the updated forms and ask for them to be certified after we agree that no further changes are required to the draft permit, and I determine no further form updates are necessary. You may certify the updates either via STEERS (preferable) or via hardcopy mail which will also require a hardcopy of the OP-CRO1 form.

If you have any questions on the items listed above or with the contents of the working draft permit, please let me know.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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<https://www.tceq.texas.gov/customersurvey>

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

**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) 239-1250 or 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: ET Gathering & Processing LLC
B. Customer Reference Number (CN): CN606187110
C. Submittal Date (mm/dd/yyyy): 05/09/25
II. Site Information
A. Site Name: Grey Wolf Gas Plant
B. Regulated Entity Reference Number (RN): RN111436614
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
☐ AR ☐ 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: <i>(Check the appropriate box[es].)</i>
☐ VOC ☒ NO _x ☒ SO ₂ ☐ PM ₁₀ ☒ CO ☐ Pb ☐ HAPS
Other:
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? ☐ Yes ☒ No
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ Yes ☒ No
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality**

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? ☐ Abbreviated ☒ Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? ☒ Yes ☐ No
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? ☐ Yes ☐ No
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) ☐ Yes ☒ No
E. Has the required Public Involvement Plan been included with this application? ☐ Yes ☒ No
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? ☐ Yes ☒ No
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
RO Full Name: Toby Clark
RO Title: VP of Operations
Employer Name: Energy Transfer LP
Mailing Address: 13788 TX-158
City: Garden City
State: TX
ZIP Code: 79739
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 432-614-9387
Fax No.:
Email: Toby.Clark@energytransfer.com

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality**

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)
Technical Contact Full Name: Lisa Garcia
Technical Contact Title: Sr. Manager, Engineering – E & C Environmental
Employer Name: Energy Transfer LP
Mailing Address: 1300 Main Street
City: Houston
State: TX
ZIP Code: 77002
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 713-989-7762
Fax No.:
Email: Lisa.Garcia@energytransfer.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator: Kevin Sparks
B. State Representative: Brooks Landgraf
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☒ Yes ☐ No ☐ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☒ Yes ☐ No
E. Indicate the alternate language(s) in which public notice is required: Spanish

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality**

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Grey Wolf Gas Plant
B. Physical Address: 764 Private Road 211J
City: Kermit
State: Tx
ZIP Code: 79789
C. Physical Location: From Wink go 5.6 mi N on FM 1232 go L 3.7 mi on TX-302 turn L on lease road 0.3 mi
D. Nearest City: Pyote
E. State: TX
F. ZIP Code: 79777

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality**

X. Application Area Information <i>(continued)</i>
G. Latitude (nearest second): 31 47' 42.3"
H. Longitude (nearest second): -103 15' 31.3"
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? ☐ Yes ☒ No
J. Indicate the estimated number of emission units in the application area: 25
K. Are there any emission units in the application area subject to the Acid Rain Program? ☐ Yes ☒ No
L. Affected Source Plant Code (or ORIS/Facility Code):
XI. Public Notice <i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>
A. Name of a public place to view application and draft permit:
B. Physical Address:
City:
ZIP Code:
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.):
Contact Person Full Name:
Contact Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality**

XII. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to TCEQ or the Office of Attorney General on behalf of TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.

XIII. Designated Representative (DR) Identifying Information

DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 7)
Texas Commission on Environmental Quality**

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.

XIV. Alternate Designated Representative (ADR) Identifying Information

ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, May 9, 2025 3:10 PM
To: Alfredo Mendoza
Subject: FW: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Hi, Alfredo. I wanted to follow up on the email below since I did not hear back from you yet. Can you please let me know what the best approach is to address the situation that I mentioned in my email below?

Thank you.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Garcia, Lisa M
Sent: Tuesday, May 6, 2025 11:21 AM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: RE: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447

Alfredo,

I was able to confirm with our compliance team that all of the engines at the site should be treated as “non-certified” units for purposes of NSPS JJJJ. Therefore, the OP-UA2 form was correct for C-4, but should be updated for the existing units in GRP-ENG. In order to address this, should I complete an updated OP-UA2 for GRP-ENG, or are there additional steps needed to allow for all engines to be represented as “non-certified” in GRP-ENG, including the new unit (C-4)?

Thank you for your assistance with this.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Monday, April 21, 2025 12:36 PM

To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

Subject: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit 04447

Lisa,

I have completed my review of the minor revision application submitted for the Grey Wolf Gas Plant. I have created a working draft permit based on the revision application which is attached for your review.

- All 40 CFR Part 60, Subpart OOOOb requirements were listed in the permit at a high-level in the Applicable Requirement Summary table as TCEQ has not developed the application forms for this regulation. If you wish the low-level citations from the OP-REQ3 to be listed in the permit, please let me know as some of the requirements seemed to be too generic especially with respect to the requirements listed for unit FUG. Unit FLARE was not listed as a separate unit for 40 CFR Part 60, Subpart OOOOb as we do not usually split the control device requirements separately from the emission unit being controlled as 40 CFR Part OOOOb will not be listed on form OP-UA7 for flares similar to why 40 CFR Part OOOO and OOOOa also do not appear on OP-UA7. When the forms and flowchart for 40 CFR Part OOOOb are developed, the flare requirements will appear in the permit for the unit that is being controlled (for example – the flare requirements would appear in the GRP-COND row if the flare is used for control of the condensate tanks).
- Please note that I could not add emission unit C-4 to existing emission unit group GRP-ENG as listed on the OP-SUMR. The reason is that the unit attributes submitted for C-4 for 40 CFR Part 60, Subpart JJJJ are different than those that were previously submitted on the OP-UA2 for GRP-ENG. The primary difference is that the Certified attribute on page 9 of the OP-UA2 was answered NO while this was answered YES for GRP-ENG. This changes that applicable requirements for unit C-4, therefore it can not be part of GRP-ENG. If this was done in error, please resubmit OP-UA2 as appropriate. If C-4 has different attributes than the existing group, then the group name should be removed for this unit on the OP-SUMR. If C-4 was meant to inherit the same requirement as the existing GRP-ENG, then emission unit C-4 should not have been added to the OP-UA2 at all as it would inherit the same attributes (previously submitted) for GRP-ENG.
- Related to the above note, I did not add separate CAM tables for C-4 as it was unclear whether this unit is part of GRP-ENG. If C-4 was meant to be part of GRP-ENG, then unit C-4 will not be added to the CAM tables separately. If C-4 is separate from GRP-ENG due to different unit attributes, then I will add separate CAM tables for unit C-4.
- Please submit form OP-1 to formally update the technical contact with your information to replace the previous OP-1 that has Hahn Duong listed as technical contact.

Please submit any comments and application updates to address the above issues by **May 2, 2025**. I will review the updated forms and ask for them to be certified after we agree that no further changes are required to the draft permit, and I determine no further form updates are necessary. You may certify the updates either via STEERS (preferable) or via hardcopy mail which will also require a hardcopy of the OP-CRO1 form.

If you have any questions on the items listed above or with the contents of the working draft permit, please let me know.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

From: Alfredo Mendoza
Sent: Monday, April 21, 2025 12:36 PM
To: Garcia, Lisa M
Subject: Working Draft Permit - ET Gathering & Processing LLC, Grey Wolf Gas Plant permit O4447
Attachments: Working draft permit O4447.docx

Lisa,

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- All 40 CFR Part 60, Subpart OOOOb requirements were listed in the permit at a high-level in the Applicable Requirement Summary table as TCEQ has not developed the application forms for this regulation. If you wish the low-level citations from the OP-REQ3 to be listed in the permit, please let me know as some of the requirements seemed to be too generic especially with respect to the requirements listed for unit FUG. Unit FLARE was not listed as a separate unit for 40 CFR Part 60, Subpart OOOOb as we do not usually split the control device requirements separately from the emission unit being controlled as 40 CFR Part OOOOb will not be listed on form OP-UA7 for flares similar to why 40 CFR Part OOOO and OOOOa also do not appear on OP-UA7. When the forms and flowchart for 40 CFR Part OOOOb are developed, the flare requirements will appear in the permit for the unit that is being controlled (for example – the flare requirements would appear in the GRP-COND row if the flare is used for control of the condensate tanks).
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If you have any questions on the items listed above or with the contents of the working draft permit, please let me know.

Thanks,

Alfredo Mendoza, P.E.
Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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FEDERAL OPERATING PERMIT

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

AUTHORIZING THE OPERATION OF
Grey Wolf Gas Plant
Natural Gas Extraction

LOCATED AT
Winkler County, Texas
Latitude 31° 47' 42" Longitude 103° 15' 31"
Regulated Entity Number: RN111436614

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

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

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

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

Permit No: 04447 Issuance Date: February 13, 2024

For the Commission

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General Terms and Conditions

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

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

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

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

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

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
 - E. Emission units subject to 40 CFR Part 63, Subparts HH and ZZZZ, as identified in the attached Applicable Requirements Summary table, are subject to 30 TAC Chapter 113,

Subchapter C, §113.390 and §113.1090, respectively, which incorporates the 40 CFR Part 63 Subpart by reference.

2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
 - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
 - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that

does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

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

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

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

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

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

- (4) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
 - C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
 - D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
 - E. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
 - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (iii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (iv) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)
4. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:

- A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
 - B. Title 40 CFR § 60.8 (relating to Performance Tests)
 - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
 - D. Title 40 CFR § 60.12 (relating to Circumvention)
 - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
 - F. Title 40 CFR § 60.14 (relating to Modification)
 - G. Title 40 CFR § 60.15 (relating to Reconstruction)
 - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
 - 6. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
 - A. Title 40 CFR § 63.760(c) (relating to Applicability and Designation of Affected Source)

Additional Monitoring Requirements

- 7. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached "CAM Summary" upon issuance of the permit. In addition, the permit holder shall comply with the following:
 - A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
 - B. The permit holder shall report, consistent with the averaging time identified in the "CAM Summary," deviations as defined by the deviation limit in the "CAM Summary." Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
 - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "CAM Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
 - D. The permit holder shall operate the monitoring, identified in the attached "CAM Summary," in accordance with the provisions of 40 CFR § 64.7.

- E. The permit holder shall comply with either of the following requirements for any capture system associated with the VOC control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions:
 - (i) Once a year the permit holder shall inspect the capture system in compliance of CAM for leaks in accordance with 40 CFR Part 60, Appendix A, Test Method 21. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppm above background or as defined by the underlying applicable requirement; or
 - (ii) Once a month, the permit holder shall conduct a visual, audible, and/or olfactory inspection of the capture system in compliance of CAM to detect leaking components.
- F. The permit holder shall conduct a once a month visual, audible, and/or olfactory inspection of the capture system to detect leaking components for any capture system associated with the control device subject to CAM. If the results of the inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions.
- G. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

New Source Review Authorization Requirements

- 8. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated January 7, 2025 in the application for project 37118), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
- 9. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 10. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating

noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

11. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
 - A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
 - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
 - C. Applicable requirements of 30 TAC § 116.620 for Installation and/or Modification of Oil and Gas Facilities based on the information contained in the registration application.

Compliance Requirements

12. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
13. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Protection of Stratospheric Ozone

14. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
 - A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

Permit Location

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

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary	12
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Applicable Requirements Summary	14
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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
C-4	SRIC Engines	N/A	60JJJJ	40 CFR Part 60, Subpart JJJJ	No changing attributes.
C-4	SRIC Engines	N/A	63ZZZZ	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
COMP-4	Fugitive Emission Units	N/A	60OOOOOb	40 CFR Part 60, Subpart OOOOb	No changing attributes.
DEHY	Glycol Dehydration	N/A	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
DEHY	Glycol Dehydration	N/A	63HH	40 CFR Part 63, Subpart HH	No changing attributes.
FLARE1	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FLARE2	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FLARE3	Flares	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
FUG	Fugitive Emission Units	N/A	60OOOOOb	40 CFR Part 60, Subpart OOOOb	No changing attributes.
GRP-COMP	Fugitive Emission Units	COMP-1, COMP-2, COMP-3, COMPVRU-1, COMPVRU-2	60OOOOa	40 CFR Part 60, Subpart OOOOa	No changing attributes.
GRP-COND	Storage Tanks/Vessels	T-2, T-3, T-4, T-5	60OOOOOb	40 CFR Part 60, Subpart OOOOb	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
GRP-ENG	SRIC Engines	C-1, C-2, C-3	60JJJJ	40 CFR Part 60, Subpart JJJJ	No changing attributes.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRP-ENG	SRIC Engines	C-1, C-2, C-3	63ZZZZ	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
HMO-HTR	Boilers/Steam Generators/Steam Generating Units	N/A	60Dc-01	40 CFR Part 60, Subpart Dc	No changing attributes.
HMO-HTR2	Boilers/Steam Generators/Steam Generating Units	N/A	60Dc-02	40 CFR Part 60, Subpart Dc	No changing attributes.
LOAD2	Miscellaneous Units	N/A	N/A	30 TAC Chapter 116, Standard Permits	No changing attributes.
PRO-AMINE	Gas Sweetening/Sulfur Recovery Units	N/A	168018	30 TAC Chapter 116, NSR Permits	No changing attributes.
PRO-AMINE	Gas Sweetening/Sulfur Recovery Units	N/A	60OOOOa-0002	40 CFR Part 60, Subpart OOOOa	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
C-4	EU	60JJJJ	CO	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(e)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4)	[G]§ 60.4245(c) § 60.4245(d)
C-4	EU	60JJJJ	NO _x	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NO _x emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(d)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4)	[G]§ 60.4245(c) § 60.4245(d)
C-4	EU	60JJJJ	VOC	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4243(g)	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4244(a) § 60.4244(b) § 60.4244(c) § 60.4244(f) § 60.4244(g)	§ 60.4243(b)(2) § 60.4243(b)(2)(ii) § 60.4243(e) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(4)	[G]§ 60.4245(c) § 60.4245(d)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
C-4	EU	63ZZZZ	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
COMP-4	EU	60OOOOOb	§111 Pollutant	40 CFR Part 60, Subpart OOOOb	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart OOOOb	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart OOOOb
DEHY	EU	168018	112(B) HAPS	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
DEHY	EU	168018	VOC	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
DEHY	EU	63HH	112(B) HAPS	40 CFR Part 63, Subpart HH	§ 63.764(e)(1)(ii) § 63.764(a) § 63.764(e)(1) § 63.764(j) § 63.775(c)(8)	The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.	[G]§ 63.772(b)(2)	§ 63.774(d)(1) § 63.774(d)(1)(ii)	None
FLARE1	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FLARE2	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
FLARE3	CD	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period. Non-excessive upset events are subject to the provisions under §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
FUG	EU	600000b	§111 Pollutant	40 CFR Part 60, Subpart 0000b	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 0000b
GRP-COMP	EU	600000a	VOC	40 CFR Part 60, Subpart 0000a	§ 60.5385a(a)(2) § 60.5370a(a) § 60.5370a(b) § 60.5385a § 60.5385a(a) § 60.5385a(b) § 60.5385a(c) § 60.5385a(d) § 60.5410a § 60.5415a(c) § 60.5415a(c)(2) § 60.5415a(c)(3)	For each reciprocating compressor you must replace the rod packing prior to 36 months from the date of the most recent rod packing replacement, or 36 months from the date of startup for a new reciprocating compressor for which the rod packing has not yet been replaced.	§ 60.5410a(c)(1) § 60.5415a(c)(1)	§ 60.5410a(c)(4) § 60.5420a(c) [G]§ 60.5420a(c)(3)	§ 60.5410a(c)(3) § 60.5420a(a) § 60.5420a(a)(1) § 60.5420a(b) [G]§ 60.5420a(b)(1) § 60.5420a(b)(11) [G]§ 60.5420a(b)(13) [G]§ 60.5420a(b)(14) [G]§ 60.5420a(b)(4)
GRP-COND	EU	600000b	§111 Pollutant	40 CFR Part 60, Subpart 0000b	§ 60.5365b The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 60, Subpart 0000b	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 60, Subpart 0000b
GRP-ENG	EU	168018	CO	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-ENG	EU	168018	Formaldehyde	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
GRP-ENG	EU	60JJJJ	CO	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(1) § 60.4243(e) § 60.4243(g) § 60.4246	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(e)	§ 60.4243(a)(1) § 60.4243(e) § 60.4245(a) § 60.4245(a)(2) § 60.4245(a)(3)	None
GRP-ENG	EU	60JJJJ	NO _x	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(1) § 60.4243(e) § 60.4243(g) § 60.4246	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NO _x emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(e)	§ 60.4243(a)(1) § 60.4243(e) § 60.4245(a) § 60.4245(a)(2) § 60.4245(a)(3)	None
GRP-ENG	EU	60JJJJ	VOC	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(1) § 60.4243(e) § 60.4243(g) § 60.4246	Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4243(e)	§ 60.4243(a)(1) § 60.4243(e) § 60.4245(a) § 60.4245(a)(2) § 60.4245(a)(3)	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRP-ENG	EU	63ZZZZ	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
HMO-HTR	EU	60Dc-01	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR	EU	60Dc-01	PM (Opacity)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR	EU	60Dc-01	SO ₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
HMO-HTR2	EU	60Dc-02	PM	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	PM (Opacity)	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
HMO-HTR2	EU	60Dc-02	SO ₂	40 CFR Part 60, Subpart Dc	§ 60.40c(a)	This subpart applies to each steam generating unit constructed, reconstructed, or modified after 6/9/89 and that has a maximum design heat input capacity of 2.9-29 megawatts (MW).	None	§ 60.48c(g)(1) § 60.48c(g)(2) § 60.48c(g)(3) § 60.48c(i)	[G]§ 60.48c(a)
LOAD2	EU	N/A	VOC	30 TAC Chapter 116, Standard Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	PRO	168018	112(B) HAPS	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018
PRO-AMINE	PRO	168018	VOC	30 TAC Chapter 116, NSR Permits	168018	168018	168018 ** See CAM Summary	168018	168018

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
PRO-AMINE	EU	600000a-0002	SO ₂	40 CFR Part 60, Subpart 0000a	§ 60.5365a(g)(3) § 60.5370a(b)	Owners or operators of facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H ₂ S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423a(c), but are not required to comply with §§60.5405a through 60.5407a and §§60.5410a(g) and 60.5415a(g).	None	§ 60.5423a(c)	§ 60.5420a(a) § 60.5420a(a)(1)

Additional Monitoring Requirements

Compliance Assurance Monitoring Summary 22

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: DEHY	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: CO	Main Standard: 168018
Monitoring Information	
Indicator: CO concentration	
Minimum Frequency: Every 15,000 hours of operation	
Averaging Period: N/A	
Deviation Limit: Maximum CO concentration shall not exceed 0.55 g/hp-hr.	
CAM Text: Use Reference Method 10 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A-100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: CO	Main Standard: 168018
Monitoring Information	
Indicator: Inlet flue gas temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Minimum inlet flue gas temperature shall not be below 550 degrees F. Maximum inlet flue gas temperature shall not exceed 1250 degrees F.	
CAM Text: The monitoring device should be installed to record the inlet flue gas temperature to the catalyst. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: “ ± 2% of reading; or “ ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: FORMALDEHYDE	Main Standard: 168018
Monitoring Information	
Indicator: CO concentration	
Minimum Frequency: Every 15,000 hours of operation	
Averaging Period: N/A	
Deviation Limit: Maximum CO concentration shall not exceed 0.55 g/hp-hr.	
CAM Text: Use Reference Method 10 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A-100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	

CAM Summary

Unit/Group/Process Information	
ID No.: GRP-ENG	
Control Device ID No.: OX CAT	Control Device Type: Catalytic converter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: FORMALDEHYDE	Main Standard: 168018
Monitoring Information	
Indicator: Inlet flue gas temperature	
Minimum Frequency: Once per day	
Averaging Period: N/A	
Deviation Limit: Minimum inlet flue gas temperature shall not be below 550 degrees F. Maximum inlet flue gas temperature shall not exceed 1250 degrees F.	
CAM Text: The monitoring device should be installed to record the inlet flue gas temperature to the catalyst. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: “ ± 2% of reading; or “ ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: LOAD2	
Control Device ID No.: FLARE3	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, Standard Permits	SOP Index No.: N/A
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: 112(B) HAPS	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: FLARE2	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Pilot Flame	
Minimum Frequency: Continuous	
Averaging Period: N/A	
Deviation Limit: No pilot flame	
CAM Text: Monitor the presence of a flare pilot flame using a thermocouple or other equivalent device to detect the presence of a flame or using an alarm that uses a thermocouple or other equivalent device to detect the absence of a flame. Maintain records of alarm events and duration of alarm events. Each monitoring device shall be accurate to within manufacturer's recommendations. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or other written procedures that provide an adequate assurance that the device is calibrated accurately.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-AMINE	
Control Device ID No.: TO	Control Device Type: Thermal incinerator (direct flame incinerator/regenerative thermal oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 116, NSR Permits	SOP Index No.: 168018
Pollutant: VOC	Main Standard: 168018
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: N/A	
Deviation Limit: Minimum combustion temperature shall not be below 1550 degrees F.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

Permit Shield

Permit Shield 36

Permit Shield

Unit / Group / Process ID No.	Group / Inclusive Units	Regulation	Basis of Determination
FLARE1	N/A	40 CFR Part 60, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Parts 60 and 61.
FLARE1	N/A	40 CFR Part 63, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Part 63.
FLARE3	N/A	40 CFR Part 60, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Parts 60 and 61.
FLARE3	N/A	40 CFR Part 63, Subpart A	Flare is not a control device used to comply with applicable subparts of 40 CFR Part 63.
GRP-COND	T-2, T-3, T-4, T-5	40 CFR Part 60, Subpart Kb	Storage vessel design capacity less than or equal to 1,589.874 m3 used for petroleum or condensate stored, processed, or treated prior to custody transfer.
GRP-COND	T-2, T-3, T-4, T-5	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.
GRP-MISC	TK-AF1, TK-AF2, TK-AM, TK-GL, TK-LO1, TK-LO2, TK-ML1, TK-ML2	40 CFR Part 60, Subpart Kb	Storage vessel capacity less than 75 m3.
GRP-MISC	TK-AF1, TK-AF2, TK-AM, TK-GL, TK-LO1, TK-LO2, TK-ML1, TK-ML2	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.
PRO-AMINE	N/A	30 TAC Chapter 112, Sulfur Compounds	Gas sweetening unit does not use sulfur recovery.
T-1	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity greater than or equal to 75 m3 but less than 151 m3 storing a liquid with a maximum TVP less than 15.0 kPa.
T-1	N/A	40 CFR Part 60, Subpart OOOOa	Storage vessel potential for VOC emissions is less than 6 tpy.

New Source Review Authorization References

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New Source Review Authorization References by Emission Unit	39

New Source Review Authorization References

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

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 168018	Issuance Date: 03/05/2025
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.359	Version No./Date: 09/10/2013

New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
C-1	Residue Compressor Engine 1	168018
C-2	Residue Compressor Engine 2	168018
C-3	Residue Compressor Engine 3	168018
C-4	Residue Compressor Engine	168018
COMP-1	Reciprocating Residue Compressor 1	168018
COMP-2	Reciprocating Residue Compressor 2	168018
COMP-3	Reciprocating Residue Compressor 3	168018
COMP-4	Reciprocating Residue Compressor	168018
COMPVRU-1	Reciprocating VRU Compressor 1	168018
COMPVRU-2	Reciprocating VRU Compressor 2	168018
DEHY	TEG Dehydration Unit	168018
FLARE1	Plant Flare	168018, 106.359/09/10/2013
FLARE2	Acid Gas Flare	168018
FLARE3	Truck Loading Flare	168018
FUG	Site Fugitives	168018
HMO-HTR	Hot Oil System Heater 1	168018
HMO-HTR2	Hot Oil System Heater 2	168018
LOAD2	Truck Loading Stabilized Condensate	168018
PRO-AMINE	Amine Sweetening Unit	168018
T-1	Slop Oil Tank	168018
T-2	Stabilized Condensate Tank 1	168018, 106.359/09/10/2013

New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
T-3	Stabilized Condensate Tank 2	168018, 106.359/09/10/2013
T-4	Stabilized Condensate Tank 3	168018, 106.359/09/10/2013
T-5	Stabilized Condensate Tank 4	168018, 106.359/09/10/2013
TK-AF1	Antifreeze Tank	168018
TK-AF2	Antifreeze Tank	168018
TK-AM	Amine Tank	168018
TK-GL	Glycol Tank	168018
TK-LO1	Lube Oil Tank	168018
TK-LO2	Lube Oil Tank	168018
TK-ML1	Methanol Tank	168018
TK-ML2	Methanol Tank	168018

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

Appendix A

Acronym List 42

Acronym List

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

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, January 10, 2025 8:11 AM
To: Alfredo Mendoza
Cc: Rhyan Stone
Subject: RE: Grey Wolf Gas Plant Title V Application - Permit No. 4447
Attachments: Grey Wolf SOP Minor Revision_January 2025.pdf

Mr. Mendoza,

Please see the attached updates to our minor revision application. A hard copy is also coming in the mail with the original OP-CRO1 signature page. Please let me know if you have any questions or need any additional information. Thank you.

Lisa M. Garcia, P.E.

Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Friday, December 13, 2024 10:35 AM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Cc: Rhyan Stone <Rhyan.Stone@tceq.texas.gov>
Subject: Re: Grey Wolf Gas Plant Title V Application - Permit No. 4447

Lisa,

I don't have any issues with granting the extension as I will be out of the office on leave for 3 weeks starting the week of December 22 and I will not be back until January 13, 2025. I will review the application submittal once I return to the office.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist
TCEQ Air Permits Division

Operating Permits Section

ph: (512) 239-1335

alfredo.mendoza@tceq.texas.gov

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

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, December 13, 2024 10:30 AM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: Re: Grey Wolf Gas Plant Title V Application - Permit No. 4447

Alfredo, I left you a voicemail, but I wanted to send you an email as well. I was just informed this morning by my compliance team that they have not had a chance to review and discuss with the RO all of these pending forms. Due to the holidays it's really difficult to get everybody together to discuss this so I was hoping that we could have an extension for 30 days to be able to get everybody back from vacations and holidays and go through the information and submit it to you. Please let me know if this is an option. I apologize for the last minute request. I was just informed about this today. Thank you.

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From: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Sent: Thursday, December 5, 2024 9:50:22 AM
To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: RE: Grey Wolf Gas Plant Title V Application - Permit No. 4447

Lisa,

In reviewing the application that was submitted in STEERS, there were various application forms that were mentioned that were not submitted. It appears the previous submittal was an abbreviated submittal which does not apply for minor revisions. The OP-2 mentions the submittal of OP-REQ3, OP-UA7, OP-UA2, and OP-MON for various emission units, however none of these form were submitted in STEERS.

Please submit these forms so I can start my technical review by December 13, 2024. You can submit the application forms as an application update through STEERS. If you email me the updates instead of sending them through STEERS, then you will need to certify them with a hard copy of the OP-CRO1.

I am currently on leave, and I will return to the office on December 9, 2024. I will be in 2 weeks and then out 3 weeks for the Christmas holiday.

Thanks,

Alfredo Mendoza, P.E.

Technical Specialist
TCEQ Air Permits Division
Operating Permits Section
ph: (512) 239-1335
alfredo.mendoza@tceq.texas.gov

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

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Thursday, September 26, 2024 4:51 PM
To: Alfredo Mendoza <alfredo.mendoza@tceq.texas.gov>
Subject: Grey Wolf Gas Plant Title V Application - Permit No. 4447

Alfredo,

I noticed that you are the permit reviewer for the Grey Wolf Gas Plant Title V Application (Permit No. 4447). I will be the technical contact for this project going forward because Hanh Duong will no longer be with Energy Transfer. My contact information is below. Please let me know if you have any questions or if you need any additional information. Thank you.

Lisa M. Garcia, P.E.
Sr. Manager – Engineering

E&C Environmental

Energy Transfer

O: 713.989.7762

M: 210.540.8853



Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.



January 7, 2025

Texas Commission on Environmental Quality
Air Permits Initial Review Team, MC-161
P.O Box 13087
Austin, Texas 78711-3087

Re: Grey Wolf Gas Plant Title V SOP Minor Revision Application Updates
Permit No. 04447
Customer Reference Number: CN606187110
Regulated Entity Number: RN111436614

Dear Mr. Mendoza:

Per your email dated December 5, 2024, please see the attached application updates for the Grey Wolf Gas Plant Title V SOP Minor Revision, including the original signature page for the OP-CRO1.

If you have any questions or need additional information, please contact me at 713-989-7762 or by email at Lisa.Garcia@energytransfer.com

Sincerely,

A handwritten signature in blue ink, appearing to read 'LG' with a stylized flourish.

Lisa Garcia
Sr. Manager – Engineering, E&C Environmental

Grey Wolf Gas Plant

CN606187110

RN111436614

Title V SOP Minor Revision Application

January 2025

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Section 6 TCEQ OP-SUMR Form – Individual Summary For Revisions
Section 7 TCEQ OP-UA2 Form – Stationary Reciprocating Combustion Engine Attributes
Section 8 TCEQ OP-UA3 Form - Storage Tank/Vessel Attributes
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Section 12 TCEQ OP-PBRSUP Form - Permits By Rule Supplemental Table

Section 1

Introduction, Project, and Process Descriptions

Introduction and Project Description

ET Gathering & Processing LLC (ETGP) owns and operates the Grey Wolf Gas Plant (the Plant) located in Winkler County, Texas. Currently, the Plant is authorized under Standard Permit Registration No. 168018 and Site Operating Permit (SOP) No. O4447. A revised Standard Permit application was submitted on April 11, 2024, to update equipment representations and increase the capacity of the Grey Wolf Gas Plant to 250MMSCFD. The revised Standard Permit Registration No. 168018 was issued on May 30, 2024. ETGP is submitting this minor revision to SOP No. O4447 to incorporate the changes authorized in the Standard Permit, as described below:

- Addition of one 5,000 hp Caterpillar G3616 (C-4)
 - C-4 added to GRP-ENG
 - Include C-4 in CAM for GRP-ENG
- Added slop oil tank (T-6) to reflect current site configuration of two slop oil tanks
- Changed name of truck loading flare (currently named FLARE2) to FLARE3
- Addition of one acid gas flare (FLARE2)
- Addition of new fugitive emission components which result in NSPS OOOOb applicability for FUG
- Addition of new PSVs to FLARE1 and additional condensate storage tank throughput which is controlled by FLARE1 results in NSPS OOOOb applicability for FLARE1
- Increase in throughput for condensate storage tanks (T2 through T5) which results in NSPS OOOOb applicability for GRP-COND
- Added CAM requirements for DEHY and PRO-AMINE which may be controlled by FLARE2 in addition to the option of control via TO
- Added CAM requirements for condensate truck loading emissions (LOAD2) that are controlled by FLARE3

This permit application has been prepared in accordance with the TCEQ SOP revision application guidance (APD-ID151v1.0, revised 05/22). An area map and plot plan are also included in Section 3.

The Title V revision application includes the following TCEQ forms:

- TCEQ Form OP-CRO1
- TCEQ Form OP-2
- TCEQ Form OP-SUMR
- TCEQ Form OP-UA2
- TCEQ Form OP-UA3
- TCEQ Form OP-UA7
- TCEQ Form OP-REQ3
- TCEQ Form OP-MON
- TCEQ Form OP-PBRSUP

Process Description

Natural gas enters the Plant through slug catchers and inlet filters where entrained liquids are separated from the inlet gas. The separated liquids, along with field condensate delivered to the Plant, are processed in a condensate stabilization system that generates Y-Grade product and stabilized condensate. Heat for the stabilization system is supplied by a hot oil system and two natural gas-fueled heaters (HMO-HTR and HMO-HTR2). The stabilized condensate, with a Reid

Vapor Pressure (RVP) ranging from two to nine pounds per square inch (psi) depending on market conditions, is transferred into four (4) 500-barrel (bbl) atmospheric storage tanks (T-2 through T-5) and loaded out by trucks (LOAD2) as needed. The storage tank vapors are captured by vapor recovery units (COMPVRU-1 and COMPVRU-2) and routed to the process flare (FLARE1). Emissions from truck loading are combusted by the truck loading flare (FLARE3). Y-Grade product is stored in pressurized tanks and exits the Plant via pipeline.

Overhead flash gas from the stabilization system is captured by electric-driven VRUs, compressed, and routed to the inlet. One VRU compressor operates continuously during normal operations. In the event of maintenance, any vapors that cannot be captured by the spare VRU compressor will be sent to the process flare (FLARE1) for combustion. Other maintenance, startup, and shutdown (MSS) activities include compressor blowdowns and miscellaneous maintenance operations. All MSS-related emissions at the Plant are authorized under Permit by Rule (PBR) at Title 30 of the Texas Administrative Code (30 TAC) §106.359.

The inlet gas stream is routed to the amine sweetening unit for the removal of carbon dioxide (CO₂) and hydrogen sulfide (H₂S). This is achieved through a two-step amine process: gas enters the bottom of the amine contactors and interacts with a lean amine solution in a counter-current flow, allowing CO₂ and H₂S to be absorbed. Sweetened natural gas exits the top of the amine contactors and flows to the Plant's dehydration systems. The rich amine is then separated from the gas stream. Flash gas is routed to the fuel system for the hot oil heaters, glycol reboiler, TO, or acid gas flare (FLARE2). If fuel system pressure becomes too high, the flash gas is diverted to the process flare (EPN FLARE1) for destruction.

Rich amine then enters the amine regenerator still, where it is heated to drive off CO₂ and H₂S. Lean amine is pumped from the bottom of the still back to the amine contactors to repeat the process. The CO₂ and H₂S-rich vapors exit the top of the regenerator still, are cooled in air coolers, and subsequently flow into a still reflux accumulator to separate condensed liquids from acid gas. The condensed liquids are pumped back to the amine still as reflux, while the acid gas vapor is directed to a TO for combustion or routed to the acid gas flare (FLARE2) during thermal oxidizer downtime.

Dehydration of the sweet natural gas is performed using a TEG unit (DEHY) and a molecular sieve unit. Sweet natural gas from the amine contactors enters the glycol contactor's bottom, where it encounters TEG in a counter-current flow. The TEG absorbs water from the natural gas, and the dry natural gas exits the top of the glycol contactor before being routed to the molecular sieve unit, where heat for regeneration of the molecular sieve beds is provided by a regenerator heater.

Rich TEG (water-saturated) leaving the glycol contactor is sent to a flash tank where entrained vapors are separated from the rich TEG. The flash gas is routed to the fuel system for the hot oil heaters, glycol reboiler, and TO. If the fuel system pressure becomes too high, the flash gas is sent to the process flare (FLARE1) for destruction. Rich glycol leaves the flash tank and enters the glycol regenerator still. Absorbed water and hydrocarbons are driven off by heat from the glycol reboiler. Lean glycol is recirculated to the glycol contactor.

The still overhead vapor passes through a BTEX condenser to remove water and heavy hydrocarbons. Any remaining non-condensable vapors are sent to the thermal oxidizer for combustion or routed to the acid gas flare (EPN FLARE2) during thermal oxidizer downtime. Condensed water and hydrocarbons are transferred to two 500-bbl atmospheric slop oil/water storage tanks (T-1 and T-6), where liquids from various plant drains and sumps are also stored and loaded by truck as necessary.

Following dehydration, sweet, dry natural gas is routed to the cryogenic process to recover natural gas liquids (NGL). Liquids are extracted by chilling the natural gas and reducing the

stream pressure, causing the NGL to condense out of the gas stream. This is achieved using electric motor-driven compressors, turboexpanders, and propane refrigeration. The resulting NGL is transported from the Plant via pipeline. Additionally, as an optional process, the NGL can be treated in amine liquid contactors prior to being discharged from the Plant via pipeline. If the NGL is treated, rich amine from the NGL amine contactors is regenerated with the rich amine from the natural gas amine contactors in the amine regenerator still.

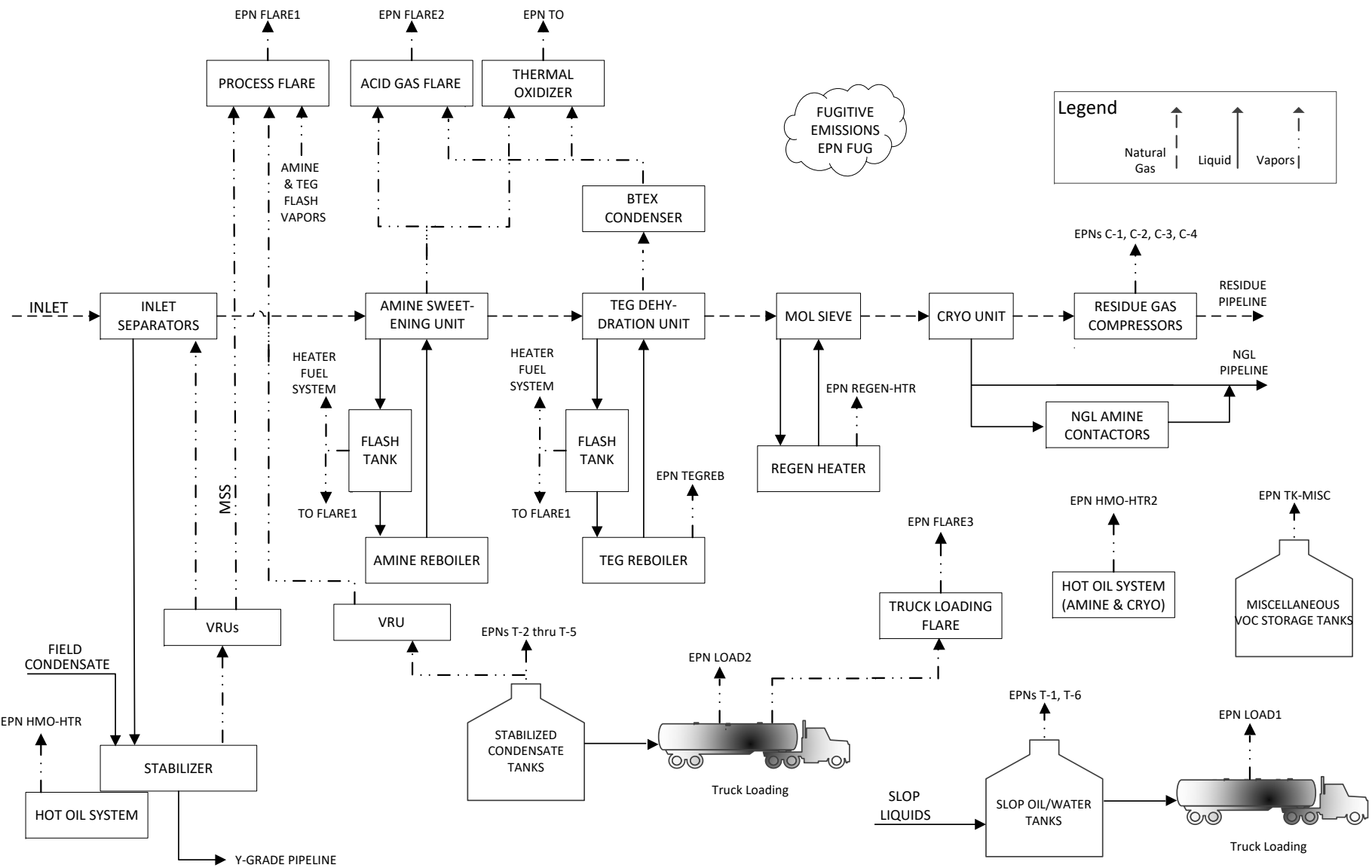
Residue gas existing the cryogenic unit is compressed by four dual-drive engine-driven compressors (C-1 through C-4) before being sent out through the residue pipeline.

The Plant has fugitive emissions from various equipment components such as piping fittings, pumps, and compressor seals. ETGP implements a Leak Detection and Repair (LDAR) program to minimize emissions from leaks throughout the Plant.

Heat for the amine treating system and the cryogenic plant is provided by a hot oil system and natural gas-fueled heaters. The Plant also features various fixed roof tanks that store lube oil, antifreeze, methanol, glycol, and amine to support on-site operations.

Section 2

Process Flow Diagram

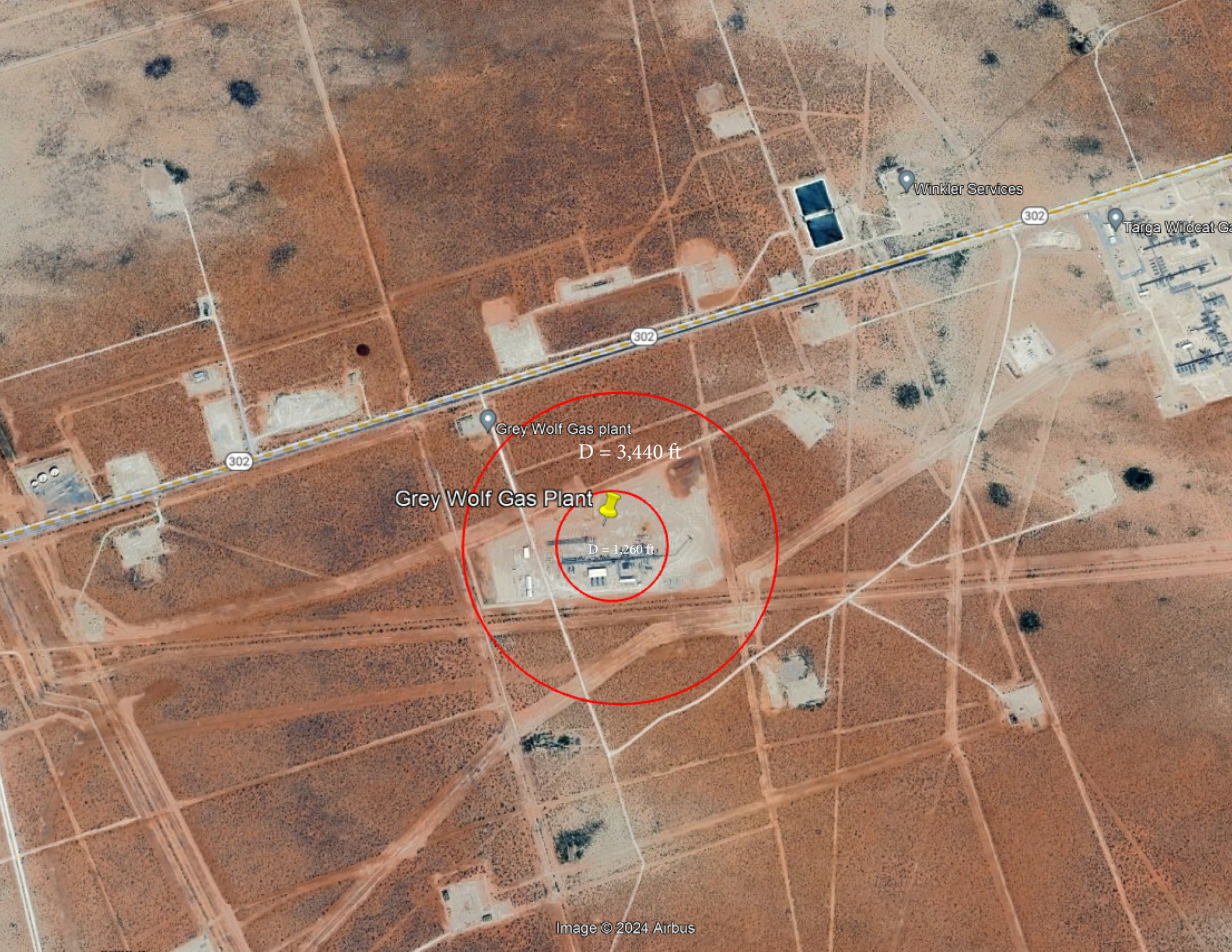


ET Gathering & Processing LLC
Title V Minor Revision Application
January 2025
Grey Wolf Gas Plant
Winkler County, Texas

Process Flow Diagram

Section 3

Area Map and Plot Plan



Winkler Services

302

Targa Wildcat Co.

302

Grey Wolf Gas plant

D = 3,440 ft

Grey Wolf Gas Plant

D = 1,260 ft



Grey Wolf Gas Plant

Section 4

TCEQ OP-CRO1 Form - Certification by Responsible Official

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application 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 Information
RN: RN111436614
CN: CN606187110
Account No.: WMA032F
Permit No.: O4447
Project No.: 37118
Area Name: Grey Wolf Gas Plant
Company Name: ET Gathering & Processing LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☒ Responsible Official Representative ☐ Duly Authorized
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☒ Update to Permit Application
☐ Other: _____

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth			
This certification does not extend to information which is designated by TCEQ as information for reference only.			
I, <u>Toby Clark</u> certify that I am the <u>RO</u>			
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:			
<i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From _____ to _____			
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: <u>1/7/2025</u> _____			
<i>(Date 1)</i>	<i>(Date 2)</i>	<i>(Date 3)</i>	<i>(Date 4)</i>
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: <u>Toby Clark</u>		Signature Date: <u>1/7/2025</u>	
Title: <u>VP of Operations</u>			

Section 5

TCEQ OP-2 Form – Application for Permit Revision/Renewal

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 1/7/2025	
Permit No.: O4447	
Regulated Entity No.: RN111436614	
Company Name: ET Gathering & Processing LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☐ NO	

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

☐ VOC ☒ NO_x ☒ SO₂ ☐ PM₁₀ ☒ CO ☐ Pb ☐ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☐ YES ☐ NO ☒ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 1/7/2025
Permit No.: O4447
Regulated Entity No.: RN111436614
Company Name: ET Gathering & Processing LLC

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C	NO	FLARE1	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
2	MS-C	NO	GRP-COND	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
3	MS-A	YES	COMP-4	OP-REQ3	168018	Add COMP-4, Subject to NSPS Subpart OOOOb
4	MS-C	NO	FUG	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
5	MS-A	YES	C-4	OP-UA2	168018	Add C-4, Subject to NSPS Subpart JJJJ
6	MS-C	NO	FLARE3	OP-UA7	168018	Change FLARE2 to FLARE3 (truck loading flare)
7	MS-B	NO	LOAD2	OP-MON	168018	Add CAM for truck loading to FLARE3
8	MS-B	NO	DEHY	OP-MON	168018	Add CAM for dehy vents to FLARE2
9	MS-B	NO	PRO-AMINE	OP-MON	168018	Add CAM for amine vents to FLARE2
10	MS-B	NO	GRP-ENG	OP-MON	168018	Include C-4 in CAM for GRP-ENG
11	MS-A	YES	FLARE2	OP-UA7	168018	Add FLARE2 (acid gas flare) to permit
12	MS-A	YES	T-6	OP-UA3	168018	Add T-6 (slop oil tank) to permit

TCEQ-10059 (APDG 5722v26, revised 03/22) OP-2

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V release 03/10)

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date: 1/7/2025	
Permit No.: O4447	
Regulated Entity No.: RN111436614	
Company Name: ET Gathering & Processing LLC	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☐ YES ☐ NO
B. Indicate the alternate language(s) in which public notice is required:	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	☐ YES ☐ NO

Section 6

TCEQ OP-SUMR Form – Individual Summary for Revisions

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

Table 1

Date		Permit No.			Regulated Entity No.		
1/7/2025		O4447			RN111436614		
Unit/ Process AI	Unit/ Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/ Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	FLARE1	OP-UA7, OP-REQ3	Process Flare		168018, 106.359/09/10/2013	
	2	GRP-COND	OP-REQ3	Condensate Tank Group		168018	
A	3	COMP-4	OP-REQ3	Reciprocating Residue Compressor		168018	
	4	FUG	OP-REQ3	Site Fugitives		168018	
A	5	C-4	OP-UA2	Residue Compressor Engine	Y	168018	
	6	FLARE3	OP-UA7	Truck Loading Flare	Y	168018	
	7	LOAD2	OP-MON	Truck Loading Stabilized Condensate	Y	168018	
	8	DEHY	OP-MON	TEG Dehydration Unit	Y	168018	
	9	PRO-AMINE	OP-MON	Amine Sweetening Unit	Y	168018	
	10	GRP-ENG	OP-MON	Residue Compressor Engines Group	Y	168018	
A	11	FLARE2	OP-UA7	Acid Gas Flare		168018	
A	12	T-6	OP-UA3	Slop Oil Tank 2		168018	

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Page ____ of ____

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

Table 2

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
5	C-4	OP-UA2	A	GRP-ENG

TCEQ OP-UA2 Form – Stationary Reciprocating Combustion Engine
Section 7
Attributes

**Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 4)**

Federal Operating Permit Program

Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
C-4	63ZZZZ	AREA	500+	06+			

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 8)
Federal Operating Permit Program
Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	Construction/ Reconstruction/ Modification Date	Test Cell	Exemption	Temp Replacement	Horsepower	Fuel	AEL No.	Lean Burn	Commencing
C-4	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 9)
Federal Operating Permit Program
Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	Manufacture Date	Displacement	Certified	Operation	Certified Modification	Service	Severe Duty	Optional Compliance
C-4	60JJJJ	N0710+		NO			NON		

Section 8

TCEQ OP-UA3 Form – Storage Tank/Vessel Attributes

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.
1/7/2025	04447	RN111436614

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-6	60Kb	WASTE	20K-40K	NONE	2.2-					

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 64)

Federal Operating Permit Program

Table 24a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction

Commenced After September 18, 2015

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	Construction/ Modification Date	Subject to Another Regulation	PTE	Compliance Option	Control Option	Control Device ID No.
T-6	60OOOOa	15+	NO	6-			

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 66)

Federal Operating Permit Program

Table 25a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	Construction/Modification Date	Compliance Subject to Another Subpart	Potential to Emit	Storage Capacity	Compliance Option	Group Type	Control Option	Control Device ID No.
T-6	600000	15+							

Section 9
TCEQ OP-UA7 Form – Flare Attributes

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 1)
Federal Operating Permit Program
Table 1: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Control of Air Pollution from Visible Emissions and Particulate Matter

Date	Permit No.:	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No	Acid Gases Only	Emergency/Upset Conditions Only	Alternate Opacity Limitation (AOL)	AOL ID No.	Construction Date
FLARE2	R1111	NO	NO			

Texas Commission on Environmental Quality

Flare Attributes

Form OP-UA7 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 and 61 (40 CFR Part 60 and 40 CFR Part 61)

Subpart A: General Provisions of Standards of Performance for New Stationary Sources and National Emission Standards for Hazardous Air Pollutants

Date	Permit No.:	Regulated Entity No.
1/7/2025	04447	RN111436614

Unit ID No.	SOP/GOP Index No.	Subject to 40 CFR §60.18	Adhering to Heat Content Specifications	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
FLARE2	60A	NO				

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 4)
Federal Operating Permit Program
Table 4: Title 40 Code of Federal Regulations Part 63
Subpart A: General Provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories

Date	Permit No.:	Regulated Entity No.
1/7/2025	04447	RN111436614

Unit ID No.	SOP/GOP Index No.	Required Under 40 CFR Part 63	Heat Content Specification	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
FLARE2	63A	NO				

Section 10

TCEQ OP-REQ3 Form – Applicable Requirements Summary

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

Table 1a: Additions

Date: 1/7/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

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)
1	FLARE1	OP-REQ3	600000b	VOC	NSPS 0000b	§60.5400b
2	GRP-COND	OP-REQ3	600000b	VOC	NSPS 0000b	§60.5395b
3	COMP-4	OP-REQ3	600000b	VOC	NSPS 0000b	§60.5385b
4	FUG	OP-REQ3	600000b	VOC	NSPS 0000b	§60.5400b

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: 1/7/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	FLARE1	OP-REQ3	VOC	§60.5413b(a)(1) §60.5412b(a)(3) §60.5417b(h)	§60.5420b(c)(11) §60.5415b(f)(2)	§ 60.5420b(b)(1) § 60.5420b(b)(11) § 60.5420b(a) § 60.5415b(f)(3)
2	GRP-COND	OP-REQ3	VOC	§60.5410b(j) §60.5415b(i) §60.5411b §60.5416b	§60.5410b(j)(7) §60.5410b(j)(9) §60.5420b(c)(7)	§60.5420b(a)(1) §60.5420b(b)(1) §60.5420b(b)(8) §60.5420b(b)(11)
3	COMP-4	OP-REQ3	VOC	§60.5385b §60.5386b(a)-(c) §60.5410b(e) §60.5415b(g)	§60.5385b(g) §60.5410b(e)(7) §60.5420b(c)(5)	§60.5420b(a)(1) §60.5385b(g) §60.5410b(e)(6) §60.5420b(b)(1) §60.5420b(b)(6) §60.5420b(b)(11)
4	FUG	OP-REQ3	VOC	§60.5400b §60.5401b	§60.5400b(l) §60.5401b(m)	§60.5400b(k) §60.5401b(l)

**Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program**

Table 2a: Deletions

Date: 1/7/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

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)
4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-10a(a) § 60.482-10a(b) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)

4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-11a(b)(2) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(i) § 60.482-11a(d) [G]§ 60.482-11a(e) [G]§ 60.482-11a(f)(1) § 60.482-11a(f)(2) § 60.482-11a(g) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-10a(a) [G]§ 60.482-10a(f) [G]§ 60.482-10a(g) § 60.482-10a(h) § 60.482-10a(i) [G]§ 60.482-10a(j) [G]§ 60.482-10a(k) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) [G]§ 60.482-2a(c)(2) [G]§ 60.482-7a(e) § 60.482-8a(a) § 60.482-8a(a)(2) § 60.482-8a(b) [G]§ 60.482-8a(c) § 60.482-8a(d) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-7a(a)(1) [G]§ 60.482-7a(a)(2) § 60.482-7a(b) [G]§ 60.482-7a(c) [G]§ 60.482-7a(d) [G]§ 60.482-7a(e) [G]§ 60.482-7a(f) [G]§ 60.482-7a(g) [G]§ 60.482-7a(h) § 60.482-9a(b) [G]§ 60.482-9a(c) § 60.482-9a(e) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-6a(a)(1) § 60.482-6a(a)(2) § 60.482-6a(b) § 60.482-6a(c) § 60.482-6a(d) § 60.482-6a(e) § 60.485a(b) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-4a(a) § 60.482-4a(b)(1) § 60.482-4a(b)(2) § 60.482-4a(c) § 60.482-4a(d)(1) § 60.482-4a(d)(2) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(b)(2) § 60.5401a(b)(3)(i) § 60.5401a(b)(3)(ii) § 60.5401a(b)(4)(i) § 60.5401a(b)(4)(ii) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-2a(a)(1) § 60.482-2a(a)(2) § 60.482-2a(b)(1) § 60.482-2a(b)(1)(i) § 60.482-2a(b)(1)(ii) § 60.482-2a(b)(2) § 60.482-2a(b)(2)(ii) § 60.482-2a(c)(1) [G]§ 60.482-2a(c)(2) § 60.482-2a(d) [G]§ 60.482-2a(d)(1) § 60.482-2a(d)(2) § 60.482-2a(d)(3) [G]§ 60.482-2a(d)(6) [G]§ 60.482-2a(e) § 60.482-2a(f) [G]§ 60.482-2a(g) § 60.482-2a(h) § 60.482-9a(a) § 60.482-9a(b) [G]§ 60.482-9a(d) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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**Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program**

Table 2b: Deletions

Date: 1/7/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-10a(e) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g)	§ 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-11a(a) § 60.482-11a(b) § 60.482-11a(b)(1) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(ii) [G]§ 60.482-11a(b)(3)(iii) § 60.482-11a(b)(3)(iv) § 60.482-11a(c) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3)	§ 60.482-11a(b)(3)(v) § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.486a(e)(9) § 60.486a(f) § 60.486a(f)(1)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(5) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(vii) § 60.487a(c)(2)(viii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1)

					[G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g)		§ 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g)	[G]§ 60.482-10a(l) § 60.485a(b)(2) [G]§ 60.486a(d) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-8a(a)(1) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.5401a(f) § 60.5401a(g)	§ 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g)	§ 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) § 60.486a(f)(2)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(2) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(i) § 60.487a(c)(2)(ii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)

4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g)	§ 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-4a(b)(2) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(b)(1) § 60.5401a(g)	§ 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(10) § 60.486a(e)(3) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) [G]§ 60.5421a(b)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) § 60.5422a(b) [G]§ 60.5422a(c)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-2a(b)(2)(i) [G]§ 60.482-2a(d)(4) [G]§ 60.482-2a(d)(5) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g)	§ 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) § 60.486a(e)(7) [G]§ 60.486a(e)(8) [G]§ 60.486a(h)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(3) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(iii) § 60.487a(c)(2)(iv) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)

Section 11

TCEQ OP-MON Form – Monitoring Requirements

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.: WMA032F	RN No.: 111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 9		
Unit/EPN/Group/Process ID No.: PRO-AMINE		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: HAP		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE2		
Control Device Type: FLARE		

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.: WMA032F	RN No.: 111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 9		
Unit/EPN/Group/Process ID No.: PRO-AMINE		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: VOC		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE2		
Control Device Type: FLARE		

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.: WMA032F	RN No.: 111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 8		
Unit/EPN/Group/Process ID No.: DEHY		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: HAP		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE2		
Control Device Type: FLARE		

**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.: WMA032F	RN No.: 111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 8		
Unit/EPN/Group/Process ID No.: DEHY		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: VOC		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE2		
Control Device Type: FLARE		

**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.: WMA032F	RN No.: RN111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 7		
Unit/EPN/Group/Process ID No.: LOAD2		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: VOC		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE3		
Control Device Type: FLARE		

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.: WMA032F	RN No.: RN111436614	CN: CN606187110
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering & Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 10		
Unit/EPN/Group/Process ID No.: C-4/GRP-ENG		
Applicable Form: OP-UA2		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: CO		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-CC-029		
Deviation Limit: Daily inlet gas temperature 550-1250 deg F		
CAM/PM Option No.: See attached Table 1c		
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr every 15,000 hours		
V. Control Device Information		
Control Device ID No.: Ox Cat		
Control Device Type: CATCNV		

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		
Account No.: WMA032F	RN No.: RN111436614	CN: CN606187110
Permit No: O4447		Project No.: 37118
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering & Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.:10		
Unit/EPN/Group/Process ID No.: C-4/GRP-ENG		
Applicable Form: OP-UA2		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: CO		
Main Standard: NSR-168018		
Monitoring Type: CAM		
Unit Size: SM		
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO		
IV. Control Device Information		
Control Device ID No.: Ox Cat		
Device Type: CATCNV		
V. CAM Case-by-case		
Indicator: CO Concentration		
Minimum Frequency: Every 15,000 hours of operation		
Averaging Period:	Use Reference Method 7E or 20 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator:		Minimum Frequency:
Averaging Period:		
Periodic Monitoring Text:		

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.: WMA032F	RN No.: RN111436614	CN: CN606187110
Permit No.: O4447	Project No.: TBD	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering & Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 10		
Unit/EPN/Group/Process ID No.: C-4/GRP-ENG		
Applicable Form: OP-UA2		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: CH ₂ O (HAP)		
Main Standard: NSR 168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-CC-029		
Deviation Limit: Daily inlet gas temperature 550-1250 deg F		
CAM/PM Option No.: See attached Table 1c		
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO (as a surrogate for CH ₂ O) every 15,000 hours		
V. Control Device Information		
Control Device ID No.: Ox Cat		
Control Device Type: CATCNV		

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		
Account No.: WMA032F	RN No.: RN111436614	CN: CN606187110
Permit No: O4447		Project No.: TBD
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering & Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 14		
Unit/EPN/Group/Process ID No.: C-4/GRP-ENG		
Applicable Form: OP-UA2		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: CH2O (HAP)		
Main Standard: NSR-168018		
Monitoring Type: CAM		
Unit Size: SM		
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO (as a surrogate for CH2O)		
IV. Control Device Information		
Control Device ID No.: Ox Cat		
Device Type: CATCNV		
V. CAM Case-by-case		
Indicator: CO Concentration (as a surrogate for CH2O)		
Minimum Frequency: Every 15,000 hours of operation		
Averaging Period:	Use Reference Method 7E or 20 to stack test the unit for CO emissions (as a surrogate for CH2O) within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator:		Minimum Frequency:
Averaging Period:		
Periodic Monitoring Text:		

TCEQ OP-PBRSUP Form – Permits By Rule Supplemental Table

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
1/7/2025	O4447	RN111436614

Unit ID No.	PBR No.	Version No./Date
FLARE 1	106.359	09/10/2013
T-2	106.359	09/10/2013
T-3	106.359	09/10/2013
T-4	106.359	09/10/2013
T-5	106.359	09/10/2013
STAB-FLASH	106.359	09/10/2013
COMP-BD	106.359	09/10/2013
MAIN	106.359	09/10/2013

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
1/7/2025	O4447	RN111436614

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
FLARE 1	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
T-2	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
T-3	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
T-4	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
T-5	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
STAB-FLASH	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
COMP-BD	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359, including volumes of any blowdowns and duration and date of each event.
MAIN	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359.



January 7, 2025

Texas Commission on Environmental Quality
Air Permits Initial Review Team, MC-161
P.O Box 13087
Austin, Texas 78711-3087

Re: Grey Wolf Gas Plant Title V SOP Minor Revision Application Updates
Permit No. 04447
Customer Reference Number: CN606187110
Regulated Entity Number: RN111436614

Dear Mr. Mendoza:

Per your email dated December 5, 2024, please see the attached application updates for the Grey Wolf Gas Plant Title V SOP Minor Revision, including the original signature page for the OP-CRO1.

If you have any questions or need additional information, please contact me at 713-989-7762 or by email at Lisa.Garcia@energytransfer.com

Sincerely,

A handwritten signature in blue ink, appearing to read 'LG' with a stylized flourish.

Lisa Garcia
Sr. Manager – Engineering, E&C Environmental

Grey Wolf Gas Plant

CN606187110

RN111436614

Title V SOP Minor Revision Application

January 2025

TABLE OF CONTENTS

Section 1 Introduction, Project, and Process Descriptions
Section 2 Process Flow Diagram
Section 3 Area Map and Plot Plan
Section 4 TCEQ OP-CRO1 Form – Certification by Responsible Official
Section 5 TCEQ OP-2 Form – Application for Permit Revision/Renewal
Section 6 TCEQ OP-SUMR Form – Individual Summary For Revisions
Section 7 TCEQ OP-UA2 Form – Stationary Reciprocating Combustion Engine Attributes
Section 8 TCEQ OP-UA3 Form - Storage Tank/Vessel Attributes
Section 9 TCEQ OP-UA7 Form - Flare Attributes
Section 10 TCEQ OP-REQ3 Form – Applicable Requirements Summary
Section 11 TCEQ OP-MON Form – Monitoring Requirements
Section 12 TCEQ OP-PBRSUP Form - Permits By Rule Supplemental Table

Section 1

Introduction, Project, and Process Descriptions

Introduction and Project Description

ET Gathering & Processing LLC (ETGP) owns and operates the Grey Wolf Gas Plant (the Plant) located in Winkler County, Texas. Currently, the Plant is authorized under Standard Permit Registration No. 168018 and Site Operating Permit (SOP) No. O4447. A revised Standard Permit application was submitted on April 11, 2024, to update equipment representations and increase the capacity of the Grey Wolf Gas Plant to 250MMSCFD. The revised Standard Permit Registration No. 168018 was issued on May 30, 2024. ETGP is submitting this minor revision to SOP No. O4447 to incorporate the changes authorized in the Standard Permit, as described below:

- Addition of one 5,000 hp Caterpillar G3616 (C-4)
 - C-4 added to GRP-ENG
 - Include C-4 in CAM for GRP-ENG
- Added slop oil tank (T-6) to reflect current site configuration of two slop oil tanks
- Changed name of truck loading flare (currently named FLARE2) to FLARE3
- Addition of one acid gas flare (FLARE2)
- Addition of new fugitive emission components which result in NSPS OOOOb applicability for FUG
- Addition of new PSVs to FLARE1 and additional condensate storage tank throughput which is controlled by FLARE1 results in NSPS OOOOb applicability for FLARE1
- Increase in throughput for condensate storage tanks (T2 through T5) which results in NSPS OOOOb applicability for GRP-COND
- Added CAM requirements for DEHY and PRO-AMINE which may be controlled by FLARE2 in addition to the option of control via TO
- Added CAM requirements for condensate truck loading emissions (LOAD2) that are controlled by FLARE3

This permit application has been prepared in accordance with the TCEQ SOP revision application guidance (APD-ID151v1.0, revised 05/22). An area map and plot plan are also included in Section 3.

The Title V revision application includes the following TCEQ forms:

- TCEQ Form OP-CRO1
- TCEQ Form OP-2
- TCEQ Form OP-SUMR
- TCEQ Form OP-UA2
- TCEQ Form OP-UA3
- TCEQ Form OP-UA7
- TCEQ Form OP-REQ3
- TCEQ Form OP-MON
- TCEQ Form OP-PBRSUP

Process Description

Natural gas enters the Plant through slug catchers and inlet filters where entrained liquids are separated from the inlet gas. The separated liquids, along with field condensate delivered to the Plant, are processed in a condensate stabilization system that generates Y-Grade product and stabilized condensate. Heat for the stabilization system is supplied by a hot oil system and two natural gas-fueled heaters (HMO-HTR and HMO-HTR2). The stabilized condensate, with a Reid

Vapor Pressure (RVP) ranging from two to nine pounds per square inch (psi) depending on market conditions, is transferred into four (4) 500-barrel (bbl) atmospheric storage tanks (T-2 through T-5) and loaded out by trucks (LOAD2) as needed. The storage tank vapors are captured by vapor recovery units (COMPVRU-1 and COMPVRU-2) and routed to the process flare (FLARE1). Emissions from truck loading are combusted by the truck loading flare (FLARE3). Y-Grade product is stored in pressurized tanks and exits the Plant via pipeline.

Overhead flash gas from the stabilization system is captured by electric-driven VRUs, compressed, and routed to the inlet. One VRU compressor operates continuously during normal operations. In the event of maintenance, any vapors that cannot be captured by the spare VRU compressor will be sent to the process flare (FLARE1) for combustion. Other maintenance, startup, and shutdown (MSS) activities include compressor blowdowns and miscellaneous maintenance operations. All MSS-related emissions at the Plant are authorized under Permit by Rule (PBR) at Title 30 of the Texas Administrative Code (30 TAC) §106.359.

The inlet gas stream is routed to the amine sweetening unit for the removal of carbon dioxide (CO₂) and hydrogen sulfide (H₂S). This is achieved through a two-step amine process: gas enters the bottom of the amine contactors and interacts with a lean amine solution in a counter-current flow, allowing CO₂ and H₂S to be absorbed. Sweetened natural gas exits the top of the amine contactors and flows to the Plant's dehydration systems. The rich amine is then separated from the gas stream. Flash gas is routed to the fuel system for the hot oil heaters, glycol reboiler, TO, or acid gas flare (FLARE2). If fuel system pressure becomes too high, the flash gas is diverted to the process flare (EPN FLARE1) for destruction.

Rich amine then enters the amine regenerator still, where it is heated to drive off CO₂ and H₂S. Lean amine is pumped from the bottom of the still back to the amine contactors to repeat the process. The CO₂ and H₂S-rich vapors exit the top of the regenerator still, are cooled in air coolers, and subsequently flow into a still reflux accumulator to separate condensed liquids from acid gas. The condensed liquids are pumped back to the amine still as reflux, while the acid gas vapor is directed to a TO for combustion or routed to the acid gas flare (FLARE2) during thermal oxidizer downtime.

Dehydration of the sweet natural gas is performed using a TEG unit (DEHY) and a molecular sieve unit. Sweet natural gas from the amine contactors enters the glycol contactor's bottom, where it encounters TEG in a counter-current flow. The TEG absorbs water from the natural gas, and the dry natural gas exits the top of the glycol contactor before being routed to the molecular sieve unit, where heat for regeneration of the molecular sieve beds is provided by a regenerator heater.

Rich TEG (water-saturated) leaving the glycol contactor is sent to a flash tank where entrained vapors are separated from the rich TEG. The flash gas is routed to the fuel system for the hot oil heaters, glycol reboiler, and TO. If the fuel system pressure becomes too high, the flash gas is sent to the process flare (FLARE1) for destruction. Rich glycol leaves the flash tank and enters the glycol regenerator still. Absorbed water and hydrocarbons are driven off by heat from the glycol reboiler. Lean glycol is recirculated to the glycol contactor.

The still overhead vapor passes through a BTEX condenser to remove water and heavy hydrocarbons. Any remaining non-condensable vapors are sent to the thermal oxidizer for combustion or routed to the acid gas flare (EPN FLARE2) during thermal oxidizer downtime. Condensed water and hydrocarbons are transferred to two 500-bbl atmospheric slop oil/water storage tanks (T-1 and T-6), where liquids from various plant drains and sumps are also stored and loaded by truck as necessary.

Following dehydration, sweet, dry natural gas is routed to the cryogenic process to recover natural gas liquids (NGL). Liquids are extracted by chilling the natural gas and reducing the

stream pressure, causing the NGL to condense out of the gas stream. This is achieved using electric motor-driven compressors, turboexpanders, and propane refrigeration. The resulting NGL is transported from the Plant via pipeline. Additionally, as an optional process, the NGL can be treated in amine liquid contactors prior to being discharged from the Plant via pipeline. If the NGL is treated, rich amine from the NGL amine contactors is regenerated with the rich amine from the natural gas amine contactors in the amine regenerator still.

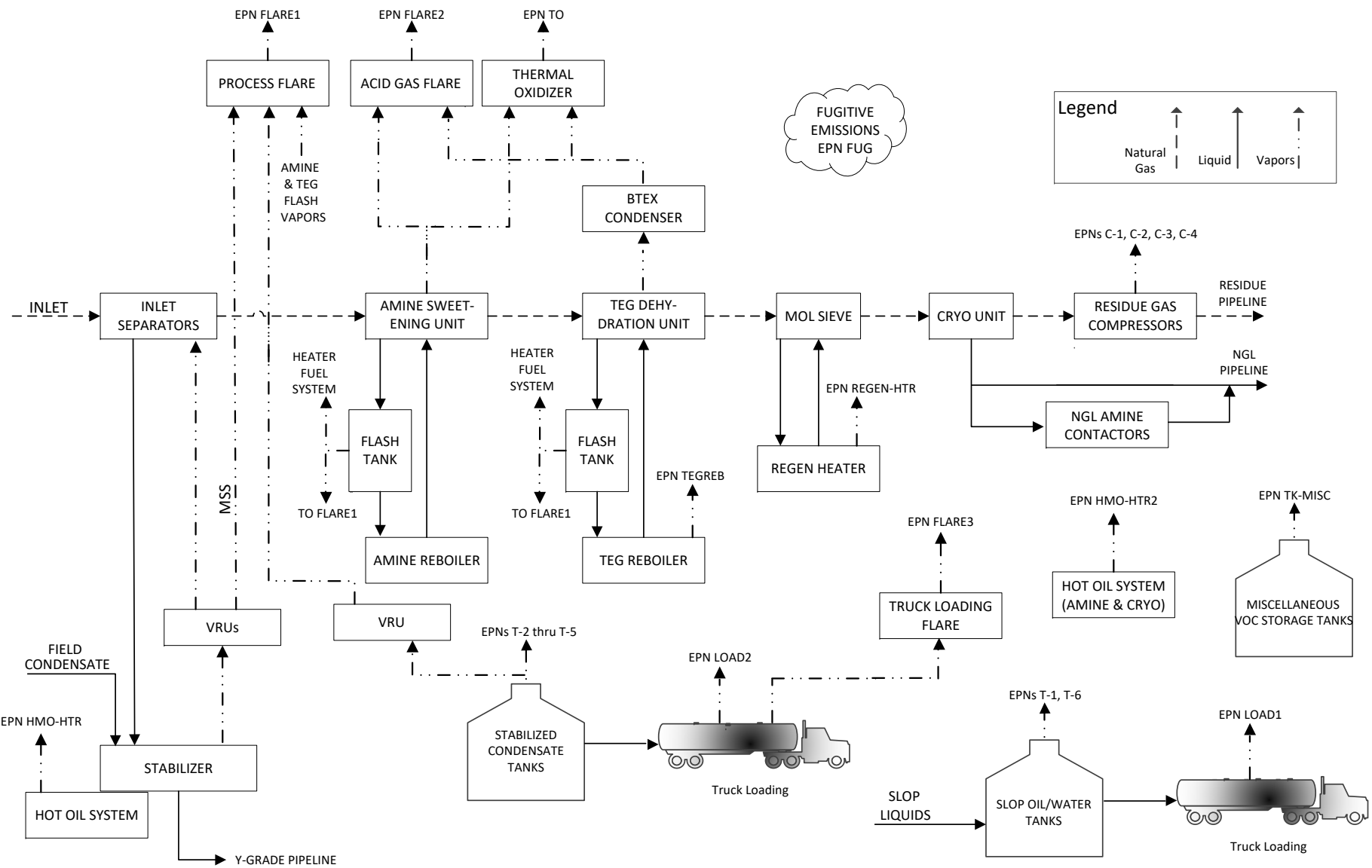
Residue gas existing the cryogenic unit is compressed by four dual-drive engine-driven compressors (C-1 through C-4) before being sent out through the residue pipeline.

The Plant has fugitive emissions from various equipment components such as piping fittings, pumps, and compressor seals. ETGP implements a Leak Detection and Repair (LDAR) program to minimize emissions from leaks throughout the Plant.

Heat for the amine treating system and the cryogenic plant is provided by a hot oil system and natural gas-fueled heaters. The Plant also features various fixed roof tanks that store lube oil, antifreeze, methanol, glycol, and amine to support on-site operations.

Section 2

Process Flow Diagram

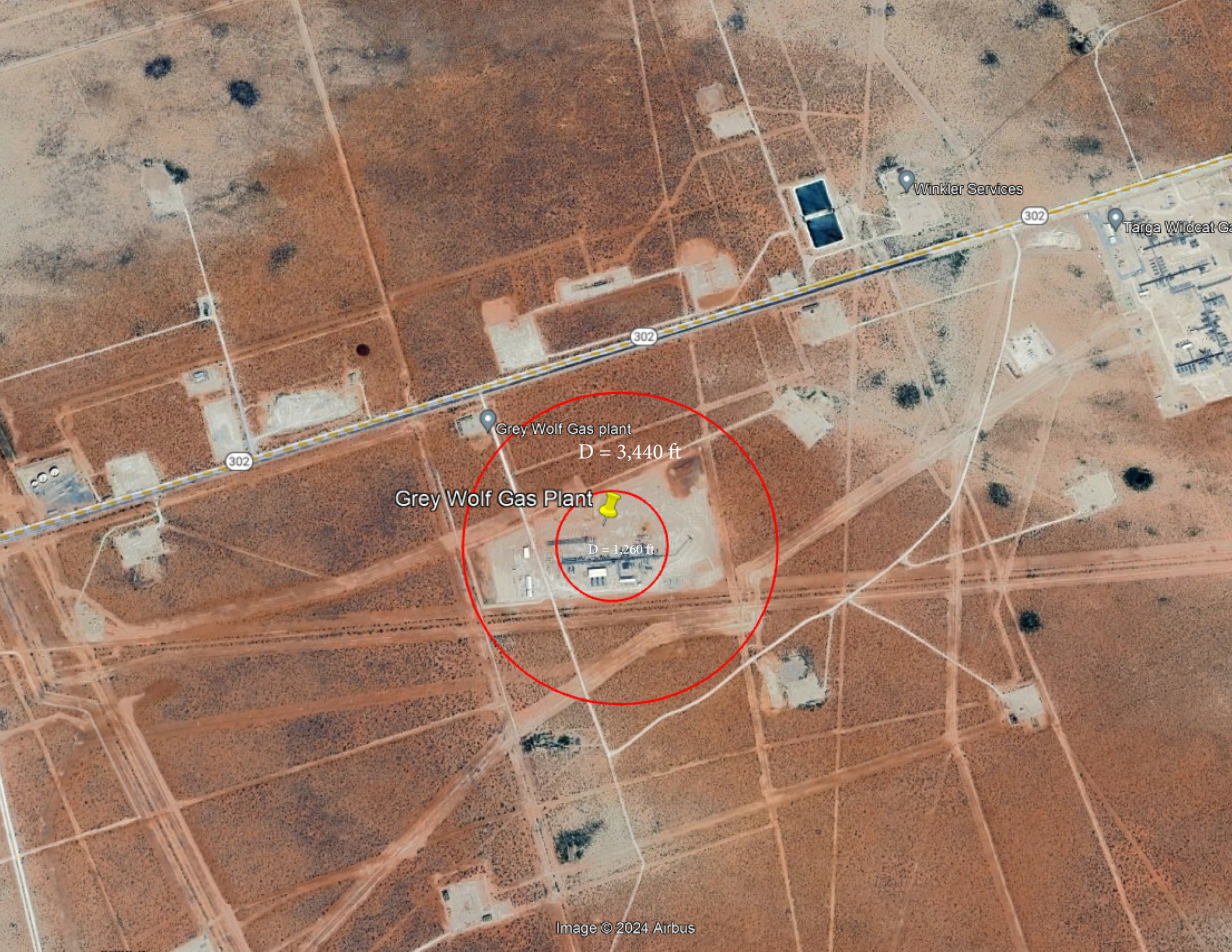


ET Gathering & Processing LLC
 Title V Minor Revision Application
 January 2025
 Grey Wolf Gas Plant
 Winkler County, Texas

Process Flow Diagram

Section 3

Area Map and Plot Plan



Grey Wolf Gas Plant

D = 1,260 ft

Grey Wolf Gas plant

D = 3,440 ft

Winkler Services

Targa Wildcat Co.

302

302

302



Grey Wolf Gas Plant

Section 4

TCEQ OP-CRO1 Form - Certification by Responsible Official

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application 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 Information
RN: RN111436614
CN: CN606187110
Account No.: WMA032F
Permit No.: O4447
Project No.: 37118
Area Name: Grey Wolf Gas Plant
Company Name: ET Gathering & Processing LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☒ Responsible Official Representative ☐ Duly Authorized
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☒ Update to Permit Application
☐ Other: _____

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth			
This certification does not extend to information which is designated by TCEQ as information for reference only.			
I, <u>Toby Clark</u> certify that I am the <u>RO</u>			
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:			
<i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From _____ to _____			
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates:	<u>1/7/2025</u>	_____	_____
	<i>(Date 1)</i>	<i>(Date 2)</i>	<i>(Date 3)</i>
	_____	_____	_____
	<i>(Date 5)</i>	<i>(Date 6)</i>	
Signature:	<u>Toby Clark</u>		Signature Date: <u>1/7/2025</u>
Title:	<u>VP of Operations</u>		

Section 5

TCEQ OP-2 Form – Application for Permit Revision/Renewal

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 1/7/2025	
Permit No.: O4447	
Regulated Entity No.: RN111436614	
Company Name: ET Gathering & Processing LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ NO

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

☐ VOC ☒ NO_x ☒ SO₂ ☐ PM₁₀ ☒ CO ☐ Pb ☐ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☐ YES ☐ NO ☒ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 1/7/2025
Permit No.: O4447
Regulated Entity No.: RN111436614
Company Name: ET Gathering & Processing LLC

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C	NO	FLARE1	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
2	MS-C	NO	GRP-COND	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
3	MS-A	YES	COMP-4	OP-REQ3	168018	Add COMP-4, Subject to NSPS Subpart OOOOb
4	MS-C	NO	FUG	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
5	MS-A	YES	C-4	OP-UA2	168018	Add C-4, Subject to NSPS Subpart JJJJ
6	MS-C	NO	FLARE3	OP-UA7	168018	Change FLARE2 to FLARE3 (truck loading flare)
7	MS-B	NO	LOAD2	OP-MON	168018	Add CAM for truck loading to FLARE3
8	MS-B	NO	DEHY	OP-MON	168018	Add CAM for dehy vents to FLARE2
9	MS-B	NO	PRO-AMINE	OP-MON	168018	Add CAM for amine vents to FLARE2
10	MS-B	NO	GRP-ENG	OP-MON	168018	Include C-4 in CAM for GRP-ENG
11	MS-A	YES	FLARE2	OP-UA7	168018	Add FLARE2 (acid gas flare) to permit
12	MS-A	YES	T-6	OP-UA3	168018	Add T-6 (slop oil tank) to permit

TCEQ-10059 (APDG 5722v26, revised 03/22) OP-2

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V release 03/10)

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 3
Texas Commission on Environmental Quality**

Date: 1/7/2025	
Permit No.: O4447	
Regulated Entity No.: RN111436614	
Company Name: ET Gathering & Processing LLC	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	☐ YES ☐ NO
B. Indicate the alternate language(s) in which public notice is required:	
C. Will, there be a change in air pollutant emissions as a result of the significant revision?	☐ YES ☐ NO

Section 6

TCEQ OP-SUMR Form – Individual Summary for Revisions

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

[Table 1](#)

Date		Permit No.			Regulated Entity No.		
1/7/2025		O4447			RN111436614		
Unit/ Process AI	Unit/ Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/ Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	FLARE1	OP-UA7, OP-REQ3	Process Flare		168018, 106.359/09/10/2013	
	2	GRP-COND	OP-REQ3	Condensate Tank Group		168018	
A	3	COMP-4	OP-REQ3	Reciprocating Residue Compressor		168018	
	4	FUG	OP-REQ3	Site Fugitives		168018	
A	5	C-4	OP-UA2	Residue Compressor Engine	Y	168018	
	6	FLARE3	OP-UA7	Truck Loading Flare	Y	168018	
	7	LOAD2	OP-MON	Truck Loading Stabilized Condensate	Y	168018	
	8	DEHY	OP-MON	TEG Dehydration Unit	Y	168018	
	9	PRO-AMINE	OP-MON	Amine Sweetening Unit	Y	168018	
	10	GRP-ENG	OP-MON	Residue Compressor Engines Group	Y	168018	
A	11	FLARE2	OP-UA7	Acid Gas Flare		168018	
A	12	T-6	OP-UA3	Slop Oil Tank 2		168018	

TCEQ-10344 (APDG 5767v7, Revised 05/20) OP-SUMR

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

Page ____ of ____

**Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR**

Table 2

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
5	C-4	OP-UA2	A	GRP-ENG

TCEQ OP-UA2 Form – Stationary Reciprocating Combustion Engine
Section 7
Attributes

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 4)

Federal Operating Permit Program

Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)

Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
C-4	63ZZZZ	AREA	500+	06+			

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 8)
Federal Operating Permit Program
Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	Construction/ Reconstruction/ Modification Date	Test Cell	Exemption	Temp Replacement	Horsepower	Fuel	AEL No.	Lean Burn	Commencing
C-4	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 9)
Federal Operating Permit Program
Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	Manufacture Date	Displacement	Certified	Operation	Certified Modification	Service	Severe Duty	Optional Compliance
C-4	60JJJJ	N0710+		NO			NON		

Section 8

TCEQ OP-UA3 Form – Storage Tank/Vessel Attributes

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.
1/7/2025	04447	RN111436614

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-6	60Kb	WASTE	20K-40K	NONE	2.2-					

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 64)

Federal Operating Permit Program

Table 24a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction

Commenced After September 18, 2015

Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	Construction/Modification Date	Subject to Another Regulation	PTE	Compliance Option	Control Option	Control Device ID No.
T-6	60OOOOa	15+	NO	6-			

Storage Tank/Vessel Attributes

Form OP-UA3 (Page 66)

Federal Operating Permit Program

Table 25a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)

Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No.	Construction/Modification Date	Compliance Subject to Another Subpart	Potential to Emit	Storage Capacity	Compliance Option	Group Type	Control Option	Control Device ID No.
T-6	600000	15+							

Section 9
TCEQ OP-UA7 Form – Flare Attributes

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 1)
Federal Operating Permit Program
Table 1: Title 30 Texas Administrative Code Chapter 111 (30 TAC Chapter 111)
Control of Air Pollution from Visible Emissions and Particulate Matter

Date	Permit No.:	Regulated Entity No.
1/7/2025	O4447	RN111436614

Unit ID No.	SOP/GOP Index No	Acid Gases Only	Emergency/Upset Conditions Only	Alternate Opacity Limitation (AOL)	AOL ID No.	Construction Date
FLARE2	R1111	NO	NO			

Texas Commission on Environmental Quality

Flare Attributes

Form OP-UA7 (Page 3)

Federal Operating Permit Program

Table 3: Title 40 Code of Federal Regulations Part 60 and 61 (40 CFR Part 60 and 40 CFR Part 61)

Subpart A: General Provisions of Standards of Performance for New Stationary Sources and National Emission Standards for Hazardous Air Pollutants

Date	Permit No.:	Regulated Entity No.
1/7/2025	04447	RN111436614

Unit ID No.	SOP/GOP Index No.	Subject to 40 CFR §60.18	Adhering to Heat Content Specifications	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
FLARE2	60A	NO				

Texas Commission on Environmental Quality
Flare Attributes
Form OP-UA7 (Page 4)
Federal Operating Permit Program
Table 4: Title 40 Code of Federal Regulations Part 63
Subpart A: General Provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories

Date	Permit No.:	Regulated Entity No.
1/7/2025	04447	RN111436614

Unit ID No.	SOP/GOP Index No.	Required Under 40 CFR Part 63	Heat Content Specification	Flare Assist Type	Flare Exit Velocity	Heating Value of Gas
FLARE2	63A	NO				

Section 10

TCEQ OP-REQ3 Form – Applicable Requirements Summary

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

Table 1a: Additions

Date: 1/7/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

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)
1	FLARE1	OP-REQ3	600000b	VOC	NSPS 0000b	§60.5400b
2	GRP-COND	OP-REQ3	600000b	VOC	NSPS 0000b	§60.5395b
3	COMP-4	OP-REQ3	600000b	VOC	NSPS 0000b	§60.5385b
4	FUG	OP-REQ3	600000b	VOC	NSPS 0000b	§60.5400b

**Applicable Requirements Summary
Form OP-REQ3 (Page 2)
Federal Operating Permit Program**

Table 1b: Additions

Date: 1/7/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	FLARE1	OP-REQ3	VOC	§60.5413b(a)(1) §60.5412b(a)(3) §60.5417b(h)	§60.5420b(c)(11) §60.5415b(f)(2)	§ 60.5420b(b)(1) § 60.5420b(b)(11) § 60.5420b(a) § 60.5415b(f)(3)
2	GRP-COND	OP-REQ3	VOC	§60.5410b(j) §60.5415b(i) §60.5411b §60.5416b	§60.5410b(j)(7) §60.5410b(j)(9) §60.5420b(c)(7)	§60.5420b(a)(1) §60.5420b(b)(1) §60.5420b(b)(8) §60.5420b(b)(11)
3	COMP-4	OP-REQ3	VOC	§60.5385b §60.5386b(a)-(c) §60.5410b(e) §60.5415b(g)	§60.5385b(g) §60.5410b(e)(7) §60.5420b(c)(5)	§60.5420b(a)(1) §60.5385b(g) §60.5410b(e)(6) §60.5420b(b)(1) §60.5420b(b)(6) §60.5420b(b)(11)
4	FUG	OP-REQ3	VOC	§60.5400b §60.5401b	§60.5400b(l) §60.5401b(m)	§60.5400b(k) §60.5401b(l)

**Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program**

Table 2a: Deletions

Date: 1/7/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

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)
4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-10a(a) § 60.482-10a(b) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)

4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-11a(b)(2) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(i) § 60.482-11a(d) [G]§ 60.482-11a(e) [G]§ 60.482-11a(f)(1) § 60.482-11a(f)(2) § 60.482-11a(g) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-10a(a) [G]§ 60.482-10a(f) [G]§ 60.482-10a(g) § 60.482-10a(h) § 60.482-10a(i) [G]§ 60.482-10a(j) [G]§ 60.482-10a(k) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) [G]§ 60.482-2a(c)(2) [G]§ 60.482-7a(e) § 60.482-8a(a) § 60.482-8a(a)(2) § 60.482-8a(b) [G]§ 60.482-8a(c) § 60.482-8a(d) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-7a(a)(1) [G]§ 60.482-7a(a)(2) § 60.482-7a(b) [G]§ 60.482-7a(c) [G]§ 60.482-7a(d) [G]§ 60.482-7a(e) [G]§ 60.482-7a(f) [G]§ 60.482-7a(g) [G]§ 60.482-7a(h) § 60.482-9a(b) [G]§ 60.482-9a(c) § 60.482-9a(e) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-6a(a)(1) § 60.482-6a(a)(2) § 60.482-6a(b) § 60.482-6a(c) § 60.482-6a(d) § 60.482-6a(e) § 60.485a(b) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-4a(a) § 60.482-4a(b)(1) § 60.482-4a(b)(2) § 60.482-4a(c) § 60.482-4a(d)(1) § 60.482-4a(d)(2) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(b)(2) § 60.5401a(b)(3)(i) § 60.5401a(b)(3)(ii) § 60.5401a(b)(4)(i) § 60.5401a(b)(4)(ii) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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4	FUG	OP-REQ3	600000a-0003	VOC	600000a	§ 60.5400a(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-2a(a)(1) § 60.482-2a(a)(2) § 60.482-2a(b)(1) § 60.482-2a(b)(1)(i) § 60.482-2a(b)(1)(ii) § 60.482-2a(b)(2) § 60.482-2a(b)(2)(ii) § 60.482-2a(c)(1) [G]§ 60.482-2a(c)(2) § 60.482-2a(d) [G]§ 60.482-2a(d)(1) § 60.482-2a(d)(2) § 60.482-2a(d)(3) [G]§ 60.482-2a(d)(6) [G]§ 60.482-2a(e) § 60.482-2a(f) [G]§ 60.482-2a(g) § 60.482-2a(h) § 60.482-9a(a) § 60.482-9a(b) [G]§ 60.482-9a(d) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370a(a) § 60.5370a(b) § 60.5400a(a) § 60.5400a(d) § 60.5400a(e) § 60.5400a(f) § 60.5401a(d) § 60.5410a § 60.5410a(f) § 60.5415a(f)
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**Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program**

Table 2b: Deletions

Date: 1/7/2025	Regulated Entity No.: RN111436614	Permit No.: O4447
Company Name: ET Gathering & Processing LLC	Area Name: Grey Wolf Gas Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-10a(e) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g)	§ 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-11a(a) § 60.482-11a(b) § 60.482-11a(b)(1) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(ii) [G]§ 60.482-11a(b)(3)(iii) § 60.482-11a(b)(3)(iv) § 60.482-11a(c) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3)	§ 60.482-11a(b)(3)(v) § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.486a(e)(9) § 60.486a(f) § 60.486a(f)(1)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(5) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(vii) § 60.487a(c)(2)(viii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1)

					[G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g)		§ 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g)	[G]§ 60.482-10a(l) § 60.485a(b)(2) [G]§ 60.486a(d) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-8a(a)(1) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.5401a(f) § 60.5401a(g)	§ 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g)	§ 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) § 60.486a(f)(2)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(2) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(i) § 60.487a(c)(2)(ii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)

4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(g)	§ 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-4a(b)(2) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401a(b)(1) § 60.5401a(g)	§ 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(10) § 60.486a(e)(3) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) [G]§ 60.5421a(b)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a) § 60.5422a(b) [G]§ 60.5422a(c)
4	FUG	OP-REQ3	600000a-0003	VOC	§ 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-2a(b)(2)(i) [G]§ 60.482-2a(d)(4) [G]§ 60.482-2a(d)(5) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401a(f) § 60.5401a(g)	§ 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) § 60.486a(e)(7) [G]§ 60.486a(e)(8) [G]§ 60.486a(h)	§ 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(3) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(iii) § 60.487a(c)(2)(iv) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420a(a) § 60.5420a(a)(1) § 60.5422a(a)

Section 11

TCEQ OP-MON Form – Monitoring Requirements

**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.: WMA032F	RN No.: 111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 9		
Unit/EPN/Group/Process ID No.: PRO-AMINE		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: HAP		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE2		
Control Device Type: FLARE		

**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.: WMA032F	RN No.: 111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 9		
Unit/EPN/Group/Process ID No.: PRO-AMINE		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: VOC		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE2		
Control Device Type: FLARE		

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.: WMA032F	RN No.: 111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 8		
Unit/EPN/Group/Process ID No.: DEHY		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: HAP		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE2		
Control Device Type: FLARE		

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.: WMA032F	RN No.: 111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 8		
Unit/EPN/Group/Process ID No.: DEHY		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: VOC		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE2		
Control Device Type: FLARE		

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.: WMA032F	RN No.: RN111436614	CN: 601587652
Permit No.: 04447	Project No.: 37118	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering and Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 7		
Unit/EPN/Group/Process ID No.: LOAD2		
Applicable Form:		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: VOC		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-FL-001		
Deviation Limit: No pilot flame		
CAM/PM Option No.:		
Deviation Limit:		
V. Control Device Information		
Control Device ID No.: FLARE3		
Control Device Type: FLARE		

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.: WMA032F	RN No.: RN111436614	CN: CN606187110
Permit No.: 04447		Project No.: 37118
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering & Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 10		
Unit/EPN/Group/Process ID No.: C-4/GRP-ENG		
Applicable Form: OP-UA2		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: CO		
Main Standard: NSR-168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-CC-029		
Deviation Limit: Daily inlet gas temperature 550-1250 deg F		
CAM/PM Option No.: See attached Table 1c		
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr every 15,000 hours		
V. Control Device Information		
Control Device ID No.: Ox Cat		
Control Device Type: CATCNV		

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		
Account No.: WMA032F	RN No.: RN111436614	CN: CN606187110
Permit No: O4447		Project No.: 37118
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering & Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.:10		
Unit/EPN/Group/Process ID No.: C-4/GRP-ENG		
Applicable Form: OP-UA2		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: CO		
Main Standard: NSR-168018		
Monitoring Type: CAM		
Unit Size: SM		
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO		
IV. Control Device Information		
Control Device ID No.: Ox Cat		
Device Type: CATCNV		
V. CAM Case-by-case		
Indicator: CO Concentration		
Minimum Frequency: Every 15,000 hours of operation		
Averaging Period:	Use Reference Method 7E or 20 to stack test the unit for CO emissions within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator:		Minimum Frequency:
Averaging Period:		
Periodic Monitoring Text:		

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.: WMA032F	RN No.: RN111436614	CN: CN606187110
Permit No.: O4447	Project No.: TBD	
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering & Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 10		
Unit/EPN/Group/Process ID No.: C-4/GRP-ENG		
Applicable Form: OP-UA2		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: CH ₂ O (HAP)		
Main Standard: NSR 168018		
IV. Title V Monitoring Information		
Monitoring Type: CAM		
Unit Size: SM		
CAM/PM Option No.: CAM-CC-029		
Deviation Limit: Daily inlet gas temperature 550-1250 deg F		
CAM/PM Option No.: See attached Table 1c		
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO (as a surrogate for CH ₂ O) every 15,000 hours		
V. Control Device Information		
Control Device ID No.: Ox Cat		
Control Device Type: CATCNV		

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		
Account No.: WMA032F	RN No.: RN111436614	CN: CN606187110
Permit No: O4447		Project No.: TBD
Area Name: Grey Wolf Gas Plant		
Company Name: ET Gathering & Processing LLC		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 14		
Unit/EPN/Group/Process ID No.: C-4/GRP-ENG		
Applicable Form: OP-UA2		
III. Applicable Regulatory Requirement		
Name: 30 TAC Chapter 116		
SOP/GOP Index No.:		
Pollutant: CH2O (HAP)		
Main Standard: NSR-168018		
Monitoring Type: CAM		
Unit Size: SM		
Deviation Limit: Maximum emission rate of 0.29 g/hp-hr CO (as a surrogate for CH2O)		
IV. Control Device Information		
Control Device ID No.: Ox Cat		
Device Type: CATCNV		
V. CAM Case-by-case		
Indicator: CO Concentration (as a surrogate for CH2O)		
Minimum Frequency: Every 15,000 hours of operation		
Averaging Period:	Use Reference Method 7E or 20 to stack test the unit for CO emissions (as a surrogate for CH2O) within 15,000 hours of operation after the previous emission test. Exhaust flow rate may be determined from measured fuel flow rate and EPA Method 19. California Air Resources Board Method A100 (adopted June 29, 1983) is an acceptable alternate to EPA test methods. In addition, install and operate an elapsed operating time meter to record hours of operation.	
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator:		Minimum Frequency:
Averaging Period:		
Periodic Monitoring Text:		

TCEQ OP-PBRSUP Form – Permits By Rule Supplemental Table

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
1/7/2025	O4447	RN111436614

Unit ID No.	PBR No.	Version No./Date
FLARE 1	106.359	09/10/2013
T-2	106.359	09/10/2013
T-3	106.359	09/10/2013
T-4	106.359	09/10/2013
T-5	106.359	09/10/2013
STAB-FLASH	106.359	09/10/2013
COMP-BD	106.359	09/10/2013
MAIN	106.359	09/10/2013

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
1/7/2025	O4447	RN111436614

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
FLARE 1	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
T-2	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
T-3	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
T-4	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
T-5	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
STAB-FLASH	106.359	09/10/2013	Maintain Records of VRU downtime and MSS waste gas volumes sent to flare
COMP-BD	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359, including volumes of any blowdowns and duration and date of each event.
MAIN	106.359	09/10/2013	Maintain records of all maintenance activities conducted under 30 TAC 106.359.

From: [Rosa Mora-Nichols](#)
To: [Garcia, Lisa M](#)
Subject: RE: OP_2 Form Needed for Project 37118, Permit O_4447, ET Gathering & Processing, LLC
Date: Friday, September 20, 2024 12:40:26 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
Importance: High

Hi Lisa,

Thank you for the information. I have one more question/request, please. Apparently, the **United States Postal Service doesn't acknowledge the mailing address for the RO, Mr. Toby Clark, that is listed as 13788 TX-158, Garden City, Texas 79739.** When we verify it thru USPS, an error pops up that says this information is not found.

When USPS acknowledges the address, it will also give us the 4-digit extension, (which is needed), after the zip code. Please reverify this information is correct, or please provide another address that can be verified through USPS.

Please promptly provide this information today, so I may finalize this project.

This address was previously used as his mailing address, not sure if this one is still a good one or not.

1706 S Midkiff Rd, Midland, TX 79701-8826

Thank you,
Rosa Mora-Nichols

From: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Sent: Friday, September 20, 2024 12:16 PM
To: Rosa Mora-Nichols <rosa.mora-nichols@tceq.texas.gov>
Subject: RE: OP_2 Form Needed for Project 37118, Permit O_4447, ET Gathering & Processing, LLC

Rosa,
Here is OP-2 for the Grey Wolf Gas Plant. Please let me know if you need anything else. Thank you.

Lisa M. Garcia, P.E.
Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



From: Rosa Mora-Nichols <rosa.mora-nichols@tceq.texas.gov>

Sent: Friday, September 20, 2024 11:35 AM

To: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

Subject: OP_2 Form Needed for Project 37118, Permit O_4447, ET Gathering & Processing, LLC

Good morning, Ms. Garcia,

Per our conversation, please submit the OP-2 Form directly to me, as I am the initial reviewer for Project 37118, Permit O_4447, ET Gathering & Processing, LLC.

Thank you,

Rosa Mora-Nichols

License and Permit Specialist

Texas Commission on Environmental Quality

Office of Air - Air Permits Division

(512) 239-2071



How are we doing? www.tceq.texas.gov/customersurvey

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

From: [Garcia, Lisa M](#)
To: [Rosa Mora-Nichols](#)
Subject: RE: OP_2 Form Needed for Project 37118, Permit O_4447, ET Gathering & Processing, LLC
Date: Friday, September 20, 2024 12:16:25 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[Grey Wolf Form OP2.pdf](#)

Rosa,

Here is OP-2 for the Grey Wolf Gas Plant. Please let me know if you need anything else. Thank you.

Lisa M. Garcia, P.E.
Sr. Manager – Engineering
E&C Environmental
Energy Transfer
O: 713.989.7762
M: 210.540.8853



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Thank you,

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License and Permit Specialist

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How are we doing? www.tceq.texas.gov/customersurvey

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality**

Date: 09/20/2024	
Permit No.: O4447	
Regulated Entity No.: RN111436614	
Company Name: ET Gathering & Processing LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☐ NO	

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 (continued)
Texas Commission on Environmental Quality**

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)

Indicate all pollutants for which the site is a major source based on the site's potential to emit:
(Check the appropriate box[es].)

☐ VOC ☒ NO_x ☒ SO₂ ☐ PM₁₀ ☒ CO ☐ Pb ☐ HAP

Other:

IV. Reference Only Requirements (For reference only)

Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? ☐ YES ☐ NO ☒ N/A

V. Delinquent Fees and Penalties

Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.

**Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality**

Date: 09/20/2024
Permit No.: O4447
Regulated Entity No.: RN111436614
Company Name: ET Gathering & Processing LLC

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	MS-C	NO	FLARE1	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
2	MS-C	NO	GRP-COND	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
3	MS-A	YES	COMP-4	OP-REQ3	168018	Add COMP-4, Subject to NSPS Subpart OOOOb
4	MS-C	NO	FUG	OP-REQ3	168018	Subject to NSPS Subpart OOOOb
5	MS-A	YES	C-4	OP-UA2	168018	Add C-4, Subject to NSPS JJJJ
6	MS-A	YES	FLARE3	OP-UA7	168018	Add FLARE3 (Truck loading flare)
7	MS-B	NO	LOAD 2	OP-MON	168018	Add CAM for truck loading to flare
8	MS-B	NO	DEHY-FL	OP-MON	168018	Add CAM for dehy vents to flare
9	MS-B	NO	AMINE-FL	OP-MON	168018	Add CAM for amine vents to flare
14	MS-B	NO	GRP-ENG	OP-MON	168018	Include C-4 in CAM for GRP-ENG

**Federal Operating Permit Program
Application for Permit Revision/Renewal**

TCEQ-10059 (APDG 5722v26, revised 03/22) OP-2

This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V release 03/10)

Form OP-2-Table 3
Texas Commission on Environmental Quality

Date: 09/20/2024	
Permit No.: O4447	
Regulated Entity No.: RN111436614	
Company Name: ET Gathering & Processing LLC	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? ☐ YES ☐ NO
B.	Indicate the alternate language(s) in which public notice is required:
C.	Will, there be a change in air pollutant emissions as a result of the significant revision? ☐ YES ☐ NO

From: TVAPPS
To: Rosa Mora-Nichols
Subject: FW: STEERS Title V Application Submittal (New Application)
Date: Thursday, September 12, 2024 9:02:09 AM

Please process. Thanks!

-----Original Message-----

From: steers@tceq.texas.gov <steers@tceq.texas.gov>
Sent: Wednesday, September 11, 2024 12:53 PM
To: RFCAIR7 <RFCAIR7@tceq.texas.gov>; TVAPPS <tvapps@tceq.texas.gov>
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by TOBY CLARK. The submittal was received at 09/11/2024 12:52 PM.

The Reference number for this submittal is 681328

The confirmation number for this submittal is 562632.

The Area ID for this submittal is 4447.

The Project ID for this submittal is 37118.

The hash code for this submittal is

526006BF6827F41FDBAD4C41C720CD823BD7CF2D0F76BAF37CA337D0359F3DDA.

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.

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application 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 Information
RN: RN111436614
CN: CN606187110
Account No.:
Permit No.: O4447
Project No.: TBD
Area Name: Grey Wolf Gas Plant
Company Name: ET Gathering & Processing LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☒ Responsible Official Representative ☐ Duly Authorized
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☒ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☐ Other: _____

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Toby Clark</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From _____ to _____ <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: <u>09/10/2024</u> _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____ Title: _____ _____
Title: <u>VP of Operations</u>

**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) 239-1250 or 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: ET Gathering & Processing LLC
B. Customer Reference Number (CN): CN606187110
C. Submittal Date (mm/dd/yyyy): 09/10/2024
II. Site Information
A. Site Name: Grey Wolf Gas Plant
B. Regulated Entity Reference Number (RN): RN111436614
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
☐ AR ☐ 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: <i>(Check the appropriate box[es].)</i>
☐ VOC ☒ NO _x ☒ SO ₂ ☐ PM ₁₀ ☒ CO ☐ Pb ☐ HAPS
Other:
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? ☐ Yes ☒ No
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ Yes ☒ No
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality**

IV. Initial Application Information <i>(Complete for Initial Issuance Applications Only.)</i>
A. Is this submittal an abbreviated or a full application? ☒ Abbreviated ☐ Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application? ☐ Yes ☐ No
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? ☐ Yes ☒ No
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) ☐ Yes ☒ No
E. Has the required Public Involvement Plan been included with this application? ☐ Yes ☒ No
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? ☐ Yes ☒ No
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
RO Full Name: Toby Clark
RO Title: VP of Operations
Employer Name: Energy Transfer LP
Mailing Address: 13788 TX-158
City: Garden City
State: Tx
ZIP Code: 79739
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 432-614-9387
Fax No.:
Email: Toby.Clark@energytransfer.com

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality**

VII. Technical Contact Identifying Information <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)
Technical Contact Full Name: Hanh K Duong
Technical Contact Title: Staff Engineer – E & C Environmental
Employer Name: Energy Transfer LP
Mailing Address: 1300 Main Street
City: Houston
State: TX
ZIP Code: 77002
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 713-989-7158
Fax No.:
Email: Hanh.Duong@energytransfer.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator:
B. State Representative:
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☐ Yes ☐ No ☒ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☐ Yes ☒ No
E. Indicate the alternate language(s) in which public notice is required:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality**

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Grey Wolf Gas Plant
B. Physical Address: 764 Private Road 211J
City: Kermit
State: Tx
ZIP Code: 79789
C. Physical Location: From Wink go 5.6 mi N on FM 1232 go L 3.7 mi on TX-302 turn L on lease road 0.3 mi
D. Nearest City: Pyote
E. State: TX
F. ZIP Code:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality**

X. Application Area Information <i>(continued)</i>
G. Latitude (nearest second): 31 47' 42.3"
H. Longitude (nearest second): -103 15' 31.3"
I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? ☐ Yes ☒ No
J. Indicate the estimated number of emission units in the application area: 25
K. Are there any emission units in the application area subject to the Acid Rain Program? ☐ Yes ☒ No
L. Affected Source Plant Code (or ORIS/Facility Code):
XI. Public Notice <i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>
A. Name of a public place to view application and draft permit:
B. Physical Address:
City:
ZIP Code:
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.):
Contact Person Full Name:
Contact Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:



September 10, 2024

Texas Commission on Environmental Quality
Air Permits Review Team
12100 Park 35 Circle, Mail Code 161
Building C, Third Floor
Austin, TX 78753

Re: Abbreviated Title V Site Operating Permit (SOP) Revision Application
SOP Permit No. 04447
ET Gathering & Processing LLC
Grey Wolf Gas Plant, RN111436614
Wink, Winkler County, Texas
Customer Reference Number: CN606187110

Dear Sir or Madame:

ET Gathering & Processing LLC (ETGP), a subsidiary of Energy Transfer LP, is in the process of completing modifications at the Grey Wolf Gas Plant, located in Winkler County, Texas. Installation and /or Modification of Oil and Gas Facilities Standards Permit Registration No. 168018 was issued on May 30, 2024, prior to commencement of construction. ETGP is pleased to submit an abbreviated Title V Site Operating Permit (SOP) revision application for an Authorization to Operate (ATO) for the Grey Wolf Gas Plant, in accordance with the requirements outlined in Title 30 of the Texas Administrative Code (30 TAC) §122.

This application includes the most recent versions of TCEQ forms. If you have any questions or need any additional information, please contact me at 713-989-7158 or via email at Hanh.Duong@energytransfer.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Hanh Duong'.

Hanh Duong
Staff Engineer

Enclosure: Abbreviated Title V SOP ATO Application

TABLE OF CONTENTS
ABBREVIATED TITLE V SITE OPERATING PERMIT (SOP) REVISION
APPLICATION
GREY WOLF GAS PLANT
ET GATHERING & PROCESSING LLC

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Section 2 OP-CRO1 Certification by Responsible Official Form	2-1

Section 1
OP-1 Site Information Summary Form

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 1)
Texas Commission on Environmental Quality**

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A. Company Name: ET Gathering & Processing LLC
B. Customer Reference Number (CN): CN606187110
C. Submittal Date (mm/dd/yyyy): 09/10/2024
II. Site Information
A. Site Name: Grey Wolf Gas Plant
B. Regulated Entity Reference Number (RN): RN111436614
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
☐ AR ☐ 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: <i>(Check the appropriate box[es].)</i>
☐ VOC ☒ NO _x ☒ SO ₂ ☐ PM ₁₀ ☒ CO ☐ Pb ☐ HAPS
Other:
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? ☐ Yes ☒ No
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? ☐ Yes ☒ No
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
III. Permit Type
A. Type of Permit Requested: <i>(Select only one response)</i>
☒ Site Operating Permit (SOP) ☐ Temporary Operating Permit (TOP) ☐ General Operating Permit (GOP)

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality**

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A. Is this submittal an abbreviated or a full application? ☒ Abbreviated ☐ Full
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C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? ☐ Yes ☒ No
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) ☐ Yes ☒ No
E. Has the required Public Involvement Plan been included with this application? ☐ Yes ☒ No
V. Confidential Information
A. Is confidential information submitted in conjunction with this application? ☐ Yes ☒ No
VI. Responsible Official (RO) Identifying Information
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
RO Full Name: Toby Clark
RO Title: VP of Operations
Employer Name: Energy Transfer LP
Mailing Address: 13788 TX-158
City: Garden City
State: Tx
ZIP Code: 79739
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 432-614-9387
Fax No.:
Email: Toby.Clark@energytransfer.com

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality**

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Technical Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)
Technical Contact Full Name: Hanh K Duong
Technical Contact Title: Staff Engineer – E & C Environmental
Employer Name: Energy Transfer LP
Mailing Address: 1300 Main Street
City: Houston
State: TX
ZIP Code: 77002
Territory:
Country: USA
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 713-989-7158
Fax No.:
Email: Hanh.Duong@energytransfer.com
VIII. Reference Only Requirements <i>(For reference only.)</i>
A. State Senator:
B. State Representative:
C. Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☐ Yes ☐ No ☒ N/A
D. Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☐ Yes ☒ No
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**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality**

IX. Off-Site Permit Request <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
A. Office/Facility Name:
B. Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
C. Physical Location:
D. Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:
E. Telephone No.:
X. Application Area Information
A. Area Name: Grey Wolf Gas Plant
B. Physical Address: 764 Private Road 211J
City: Kermit
State: Tx
ZIP Code: 79789
C. Physical Location: From Wink go 5.6 mi N on FM 1232 go L 3.7 mi on TX-302 turn L on lease road 0.3 mi
D. Nearest City: Pyote
E. State: TX
F. ZIP Code:

**Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality**

X. Application Area Information <i>(continued)</i>
G. Latitude (nearest second): 31 47' 42.3"
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I. Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? ☐ Yes ☒ No
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L. Affected Source Plant Code (or ORIS/Facility Code):
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A. Name of a public place to view application and draft permit:
B. Physical Address:
City:
ZIP Code:
C. Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.):
Contact Person Full Name:
Contact Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:

Section 2

OP-CRO1 Certification by Responsible Official Form

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, renewal, and reopening permit application 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 Information
RN: RN111436614
CN: CN606187110
Account No.:
Permit No.: O4447
Project No.: TBD
Area Name: Grey Wolf Gas Plant
Company Name: ET Gathering & Processing LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☒ Responsible Official Representative ☐ Duly Authorized
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☒ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☐ Other: _____

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program
Texas Commission on Environmental Quality

All initial issuance, revision, and renewal permit application submittals requiring certification must be accompanied by this form. Updates to acid rain or CSAPR (other than public notice verification materials) must be certified prior to authorization of public notice for the draft permit.

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Toby Clark</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From _____ to _____ <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: <u>09/10/2024</u> _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____ Title: _____ _____
Title: <u>VP of Operations</u>

Texas Commission on Environmental Quality

Title V Existing

4447

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	GREY WOLF GAS PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	From Wink, go 5.6 mi N on FM 1232, turn left 3.7 mi on Hwy 302, turn left on lease road 0.3 mi
City	Wink
State	TX
ZIP	79789
County	WINKLER
Latitude (N) (##.#####)	31.795
Longitude (W) (-###.#####)	103.258611
Primary SIC Code	1321
Secondary SIC Code	
Primary NAICS Code	211130
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111436614
What is the name of the Regulated Entity (RE)?	GREY WOLF GAS PLANT
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM WINK GO 5.6 MI N ON FM 1232 GO L 3.7 MI ON TX 302 TURN L ON LEASE RD 0.3 MI TO SITE
City	WINK
State	TX
ZIP	79789
County	WINKLER
Latitude (N) (##.#####)	31.795085
Longitude (W) (-###.#####)	-103.2587
Facility NAICS Code	
What is the primary business of this entity?	NATURAL GAS PROCESSING

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606187110
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	ET Gathering & Processing LLC
Texas SOS Filing Number	805195570
Federal Tax ID	
State Franchise Tax ID	32091185952

State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	501+
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	ENERGY TRANSFER LP
Prefix	MR
First	TOBY
Middle	
Last	CLARK
Suffix	
Credentials	
Title	VICE PRESIDENT OPERATIONS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1706 S MIDKIFF RD
Routing (such as Mail Code, Dept., or Attn:)	
City	MIDLAND
State	TX
ZIP	79701
Phone (###-###-####)	4326149387
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	toby.clark@energytransfer.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.	New Contact
Organization Name	Energy Transfer
Prefix	MS
First	Hanh
Middle	
Last	Duong
Suffix	
Credentials	
Title	Staff Engineer - E&C Environmental
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic

Mailing Address (include Suite or Bldg. here, if applicable)	1300 MAIN ST
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77002
Phone (###-###-####)	7139897158
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	Hanh.Duong@energytransfer.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	31 Deg 47 Min 42 Sec
3) Permit Longitude Coordinate:	103 Deg 15 Min 31 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)	
[File Properties]	
File Name	OP-1 Site Info Summary Form 10002.pdf
Hash	E36FC6A69AA68CEE54F3B2D357AE6B5B9C71523464FFAF8B84A500DF23A66ECD
MIME-Type	application/pdf
Attach OP-2 (Application for Permit Revision/Renewal)	
Attach OP-REQ1 (Application Area-Wide Applicability Determinations and General Information)	
Attach OP-REQ2 (Negative Applicable Requirement Determinations)	
Attach OP-REQ3 (Applicable Requirements Summary)	
Attach OP-PBR SUP (Permits by Rule Supplemental Table)	
Attach OP-SUMR (Individual Unit Summary for Revisions)	

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

If applicable, attach OP-AR1 (Acid Rain Permit Application)

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	OP-CRO1_Abbreviated 10009.pdf
Hash	B8B42EFAD904CB1B2E8C276529ABA200B6EE457A35CE8FA15A52F048C689C690
MIME-Type	application/pdf

An additional space to attach any other necessary information needed to complete the permit.

[File Properties]

File Name	20240910 Grey Wolf SOP Abbreviated App_.pdf
Hash	08371FFE9E501C33325FD566A79E2BCCFF5E324A3DB8D5F8AA3AF2F821069A6A
MIME-Type	application/pdf

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No
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Certification

I certify that I am the Responsible Official for this application and that, based on information and belief formed after reasonable inquiry, the statements and information on this form are true, accurate, and complete.

1. I am Toby Clark, the owner of the STEERS account ER092507.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 4447.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEC

OWNER OPERATOR Signature: Toby Clark OWNER OPERATOR

Account Number:	ER092507
Signature IP Address:	63.105.50.19
Signature Date:	2024-09-11
Signature Hash:	4AF8EBCEFB59F28C7DF07A7823CE66B8540ACCA0A45B2F62BD48345D6E8AC241
Form Hash Code at time of Signature:	526006BF6827F41FDBAD4C41C720CD823BD7CF2D0F76BAF37CA337D0359F3DDA

Submission

Reference Number:	The application reference number is 681328
Submitted by:	The application was submitted by ER092507/Toby Clark
Submitted Timestamp:	The application was submitted on 2024-09-11 at 12:52:48 CDT
Submitted From:	The application was submitted from IP address 63.105.50.19
Confirmation Number:	The confirmation number is 562632
Steers Version:	The STEERS version is 6.82
Permit Number:	The permit number is 4447

Additional Information

Application Creator: This account was created by Hanh K Duong