SITE OPERATION PERMIT (SOP) MINOR MODIFICATION

IACX Rock Creek LLC > Rock Creek Gas Plant

Prepared By:

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September 2024

Project 244401.0136

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1. EXECUTIVE SUMMARY

IACX Rock Creek LLC (IACX) owns and operates a gas plant located in Borger, Texas (Rock Creek Gas Plant). IACX operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 100216613. The Rock Creek Gas Plant has been assigned TCEQ Air Quality Account Number HW0020F and Regulated Entity Number (RN) 100216613. The site is authorized by New Source Review (NSR) Permit No. 3131A and various Permits By Rule (PBRs).

Hutchinson County is currently an attainment or unclassified area for all criteria pollutants except for SO_2. The Rock Creek Gas Plant is an existing a major source with respect to Prevention of Significant Deterioration (PSD). The Nonattainment New Source Review (NNSR) program is not applicable to the Rock Creek Gas Plant. The Rock Creek Gas Plant operates under the federal operating permit program (Title V) due to potential emissions of volatile organic compounds (VOC), oxides of nitrogen (NOX), sulfur dioxide (SO2), and carbon monoxide (CO). The IACX Rock Creek Gas Plant currently operates under Site Operating Permit (SOP) / Title V Permit No. O-2449.

With this application, IACX requests to modify Title V Permit No. O-2449. Rock Creek is located in the Hutchinson County SO2 Nonattainment area and is subject to the requirements listed in Texas Administrative Code (TAC) Section 112, Subchapter F, Division 2. Therefore, the current Title V Permit is being modified to include the Section 112 requirements and associated New Source Review (NSR) modifications.

1.1 30 TAC Chapter 112

How the Rock Creek Gas Plant will comply with the 30 TAC 112, Subchapter F, Division 2 requirements is discussed below.

1.1.1 §112.210 Applicability

(a) The requirements in this division apply to affected sources at the IACX Rock Creek Gas Plant, which is located at 1000 West Tenth Street in Borger, Texas in the Hutchinson County sulfur dioxide nonattainment area. Affected sources will remain subject to this division regardless of ownership, operational control, or other documentation changes.

(b) Affected sources are designated by the source name and emission point number (EPN) used in the site's New Source Review (NSR) permit as issued on the specified date. The specific affected sources are as follows:

(1) Acid Gas Flare (EPN FLR1) in NSR Permit 3131A dated July 12, 2011; and
(2) Acid Gas Incinerator (EPN INCIN1) in NSR Permit 3131A dated July 12, 2011.

IACX understands the Rock Creek Gas Plant is an applicable site under this rule.

1.1.2 §122.211 Definition

Unless specifically defined in the Texas Clean Air Act (Texas Health and Safety Code, Chapter 382), or in §101.1 or §112.1 of this title (relating to Definitions, respectively), the terms in this division have the meanings commonly used in the field of air pollution control. The following meanings apply in this division unless the context clearly indicates otherwise.

(1) Block one-hour average - An hourly average of data, collected starting at the beginning of each clock hour of the day and continuing until the start of the next clock hour (e.g., from 12:00:00 to 12:59:59).
(2) Continuous Monitoring - Monitoring for which readings are recorded at least once every 15 minutes.
(3) Hutchinson County sulfur dioxide (SO_2) nonattainment area--The portion of Hutchinson County designated by the United States Environmental Protection Agency (EPA) as nonattainment for the 2010 SO_2 National Ambient Air Quality Standard, 40 Code of Federal Regulations §81.344.

IACX understands the above requirements.

1.1.3 §122.212 Control Requirements

(a) Acid Gas Flare (EPN FLR1) and Acid Gas Incinerator (EPN INCIN1) may not operate simultaneously.

(b) Acid Gas Flare (EPN FLR1) emissions may not exceed 140.00 lb/hr sulfur dioxide (SO_2).

(c) Acid Gas Incinerator (EPN INCIN1) emissions may not exceed 140.00 lb/hr SO_2.

(d) The owner or operator may request an alternate means of control under the provisions of §112.232(k) of this title (relating to Control Requirements).

IACX understands the above requirements and this application is submitted to comply with the above requirements.

1.1.4 §122.213 Monitoring and Testing Requirements

(a) Monitoring requirements. The owner or operator shall continuously monitor, at a point prior to the manifold that directs gases to the Acid Gas Flare (EPN FLR1) or Acid Gas incinerator (EPN INCIN1), the gases routed to Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1) by using the following:

(1) monitor at a point the sulfur content of the gas stream as follows:

(A) using a separate dedicated analyzer capable of accurately measuring and recording total sulfur (including sulfur dioxide (SO_2), hydrogen sulfide (H_2S), and organic sulfur compounds levels) with an accuracy of ±5% on a continuous basis, the sulfur concentration must be determined in accordance 40 Code of Federal Regulations (CFR) §60.107a(e)(1) regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and hourly SO_2 emissions must be determined using the following equation; or

$$SO_2 = Scc \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2	=	Sulfur dioxide emissions in units of pounds per hour;
Scc	=	inlet sulfur compound concentration in cubic feet per 1,000,000 cubic feet of waste gas;
FFa	=	inlet waste gas stream flow in actual cubic feet per hour;
Psc	=	regulatory standard condition pressure of 14.7 pounds per square inch (psia);

Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet actual stream temperature in degrees Rankin

(B) using a separate dedicated analyzer capable of accurately measuring and recording H_2S to an accuracy of ±5% on a continuous basis, determine the H_2S concentration in the flared gas stream, derive an inlet flare or incinerator gas total sulfur concentration for each monitored hourly H_2S concentration in accordance 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and calculate the SO_2 emissions from the flare and the incinerator for each operating hour that either is operated using the following equation:

$$SO_2 = H_2Smc \times \frac{Scc}{H_2Ssc} \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2 = Sulfur dioxide emissions in units of pounds per hour;
H_2Smc = monitored inlet hydrogen sulfide (H_2S) concentration in units of cubic feet of flare gas inlet stream sulfur compounds per 1,000,000 cubic feet of waste gas;
Scc = inlet sulfur compound concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas derived in accordance with 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable;
H_2Ssc = sampled H_2S concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas;
FFa = inlet gas stream flow in units of actual cubic feet per hour;
Psc = regulatory standard condition pressure of 14.7 pounds per square inch (psia);
Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet stream actual temperature in degrees Rankin (the Tsc/Ta factor is used to convert FFa actual cubic feet to FFa standard cubic feet).

(C) a totalizing gas flow meter with an accuracy of ±5% that is installed, calibrated, maintained, and operated according to per the manufacturer's specifications directions to continuously measure and record the volume of gas directed to the Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1); and

(D) monitor the temperature of gases routed to the flare or incinerator using a temperature measurement device with an accuracy of ±1%; the inlet flare gas temperature measurement device must be installed, calibrated, maintained, and operated according to the manufacturer's recommendations and specifications.

(2) In lieu of the monitoring requirements of §112.213(a)(1) of this subsection, the owner or operator may install, calibrate, and maintain a continuous emissions monitoring system to monitor exhaust SO_2 from the Acid Gas Incinerator (EPN INCIN1) in accordance with the requirements of 40 CFR §60.13, 40 CFR Part 60, Appendix B, Performance Specification 2 and 6, for SO_2, and 40 CFR Part 60, Appendix F, quality assurance procedures;

(3) Continuous monitoring data collected in accordance with requirements in this subsection must undergo an appropriate quality assurance and quality control process and be validated for at least 95% of the time that the monitored emission point has emissions; an owner or operator must utilize an appropriate data substitution process based on the most accurate methodology available, which is at least equivalent to engineering judgment, to obtain all missing or invalidated monitoring data for the remaining period the monitored emission point has emissions.

(4) Minor modifications to monitoring methods may be approved by the executive director. Monitoring methods other than those specified in this section may be used if approved by the executive director and validated by 40 CFR Part 63, Appendix A, Test Method 301. For the purposes of this subsection, substitute "executive director" in each place that Test Method 301 references "administrator." These validation procedures may be waived by the executive director or a different protocol may be granted for site-specific applications. Minor modifications that may be approved under this subsection include increases in the frequency of monitoring provided appropriate quality assurance control, accuracy specifications, and data validation requirements are specified and no less stringent than monitoring requirements for a comparable EPN in this subchapter.

IACX understands the above monitoring requirements and will select one of the calculation options. However, IACX proposes to conduct periodic (weekly) sampling instead of continuous monitoring.

(b) Testing requirements.

(1) The owner of operator shall perform initial testing for monitoring devices required by subsection (a) of this section if documentation is not available to demonstrate initial tests have been conducted, as well as all subsequent testing, in accordance with the manufacturer's specifications to ensure that the required monitors are calibrated and function properly by the compliance date in §112.218 of this title (relating to Compliance Schedules).

(2) The owner or operator shall conduct initial performance testing by the compliance date in §112.218 of this title. During performance testing, the owner or operator shall operate the source at the maximum rated capacity, or as near thereto as practicable. The owner or operator shall conduct additional performance tests on the incinerator at least every five years after the compliance date to ensure the accuracy of the monitors for the gas stream sent to the incinerator or flare.

(3) The owner or operator shall conduct additional performance testing, if requested by the executive director, in compliance with 40 CFR §60.104a to demonstrate compliance with applicable emission limits or standards. The notification requirements of 40 CFR §60.8(d) apply to each initial performance test and to each subsequent performance test required by the executive director.

(4) All performance tests must be conducted using test methods allowed in §112.213(c).

IACX understands the above requirements and will conduct the required performance test.

(c) Approved test methods.

(1) Tests required under paragraph (b) of this section must be conducted using the test methods in 40 CFR Part 60, Appendices A-1 through A-8 and Appendix B or other methods as specified in this section, except as provided in §60.8(b).

(2) Sulfur dioxide in exhaust gases from the incinerator during testing must be determined using United States Environmental Protection Agency (EPA) Test Method 6 or 6C (40 CFR, Part 60, Appendix A).

(3) Alternate test methods as approved by the executive director and the EPA may be used.

The required performance test will follow the above test methods.

1.1.5 §122.216 Recordkeeping Requirements

The owner or operator shall maintain records in written or electronic format for a minimum of five years of the continuous monitoring of the sulfur content and flow rate of gases routed to either the flare or the incinerator as well as which control device was in use and of all monitoring data and emission calculations required under §112.213 of this title (relating to Monitoring Requirements). The owner or operator shall maintain records for a minimum of five years of all testing done for monitors and copies of each performance test conducted. The owner or operator shall maintain documentation for a minimum of five years of any period that emission limits or standards were exceeded and copies of required exceedance reports submitted to the appropriate Texas Commission on Environmental Quality Regional Office.

IACX understands the above requirements and will maintain the required records.

1.1.6 §122.217 Reporting Requirements

(a) For a source that is subject to an emissions limit in §112.212 of this title (relating to Control Requirements) and that exceeds an applicable emission limit or fails to meet a required stack parameter, the owner or shall submit to the Texas Commission on Environmental Quality (TCEQ) Regional Office for the area where the plant is located a report by March 31 of the year after an exceedance occurs documenting the excess emissions during the preceding calendar year, including at least the following:

(1) the date that each exceedance or failure to meet a required stack parameter occurred;

(2) an explanation of the exceedance or failure to meet a required stack parameter;

(3) a statement of whether the exceedance or failure to meet a required stack parameter was concurrent with a maintenance, startup, or shutdown period for, or malfunction of, an affected source or control system;

(4) a description of the action taken, if any; and

(5) a written statement, signed by the owner or operator, certifying the accuracy and completeness of the information contained in the report.

(b) The owner or operator shall submit a copy of each performance test report to the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction for the area where the plant is located within 60 days after completion of the test.

(c) After the effective date of a determination by the Environmental Protection Agency (EPA) that the Hutchinson County sulfur dioxide (SO_2) nonattainment area has failed to attain the 2010 one-hour SO_2 National Ambient Air Quality Standard or failed to meet reasonable further progress (RFP) pursuant to federal Clean Air Act §179(c), 42 United States Code §7509(c), the TCEQ will notify the owner or operator of the failure to attain and that the contingency measures in this subsection are triggered. Once notification is

received from the TCEQ, the owner or operator shall perform a full system audit (FSA) of all SO_2 sources subject to §112.210 of this title (relating to Applicability).

(1) Within 90 calendar days after the date of the notification, the owner or operator shall submit the FSA, including recommended provisional SO_2 emission control strategies as necessary, to the executive director of the TCEQ.

(2) As part of the FSA, the owner or operator shall conduct a root cause analysis of the circumstances surrounding the cause of the determination of failure to attain or failure to meet RFP, including a review and consideration of the following:

(A) for all causes of the determination of failure to attain or failure to meet RFP, at a minimum, hourly mass emissions of SO_2 from each SO_2 source subject to this division; and

(B) for a determination of failure to attain based on ambient air monitor data or modeling data, at a minimum, the meteorological conditions recorded at the monitor or other relevant meteorological data, including the frequency distribution of wind direction temporally correlated with SO_2 readings greater than 75 parts per billion at the monitor for which the EPA's determination of failure to attain was made; and any emissions event that may have occurred. The root cause analysis and associated records used to conduct the audit must consider information on the days that monitored exceedances occurred during the time period that the EPA evaluated in making the failure to attain determination.

IACX understands the above requirements and will follow applicable reporting requirements.

1.1.7 §122.218 Compliance Schedules

The owner or operator of a source subject to §112.210 of this title (relating to Applicability) shall comply with the requirements of this division no later than October 1, 2023.

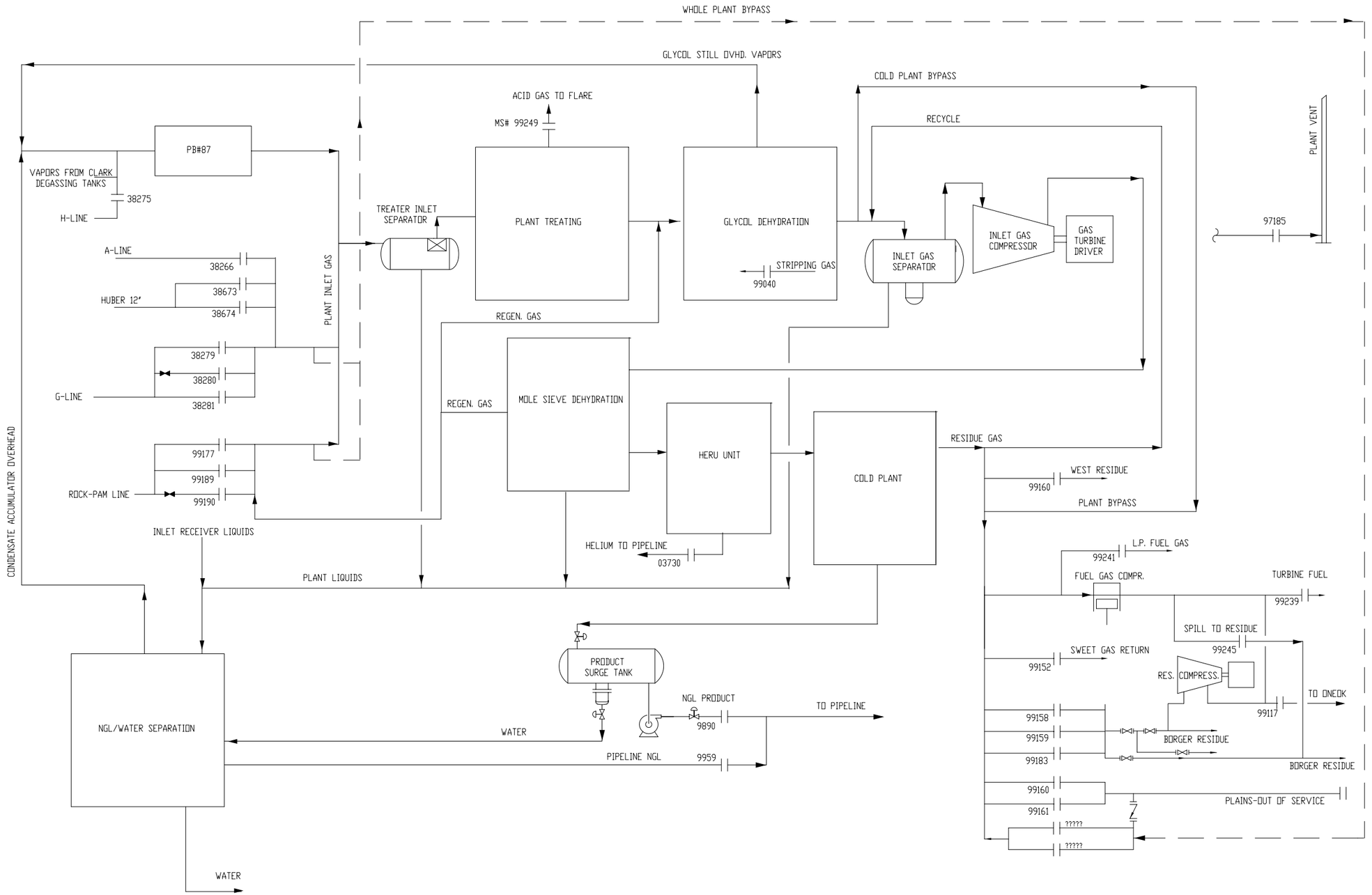
IACX submitted an amendment application for NSR permit No. 3131A to incorporate the 30 TAC 112 Subchapter F Division 2 requirements to obtain permit issuance by October 1, 2023.

1.2 APPLICATION CONTENTS

The enclosed SOP initial application for RFAB consists of the following TCEQ Forms and supplemental information:

- Section 2. Process Flow Diagram
- Section 3. Area Map
- Section 4. Plot Plan
- Section 5. Form OP-CRO1
- Section 6. Form OP-2
- Section 7. Form OP-REQ3
- Section 8. Form OP-SUMR
- Section 9. Form OP-UA1

2. PROCESS FLOW DIAGRAM



REFERENCE DRAWINGS:	NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
	1	16FEB07	INSTALL NEW BORDER	BRL			
	0		ORIGINAL ISSUE	MWT			

ROCK CREEK

ROCK CREEK PLANT

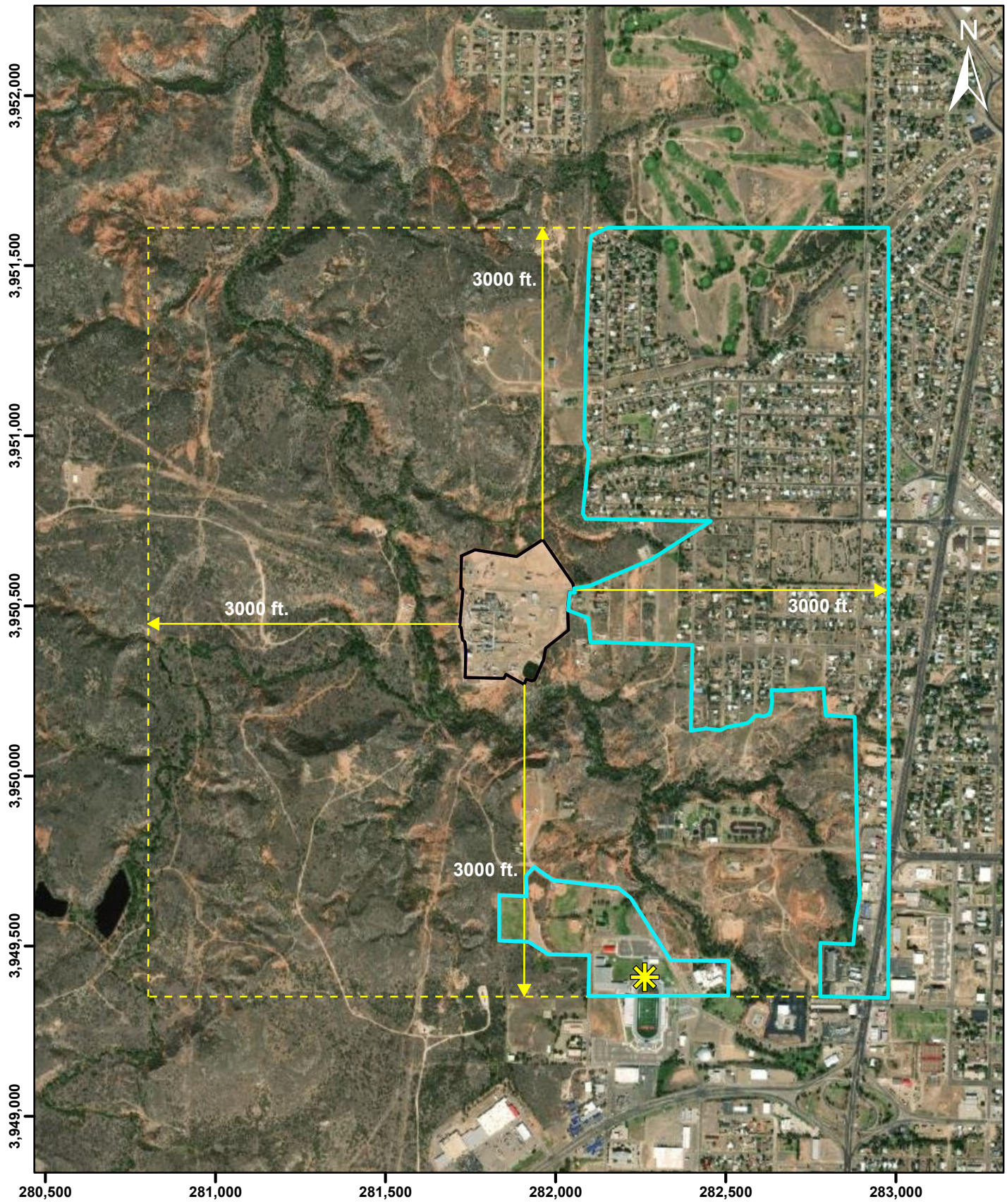
SIMPLIFIED BLOCK DIAGRAM

SCALE: NONE	PLOT SCALE: 1=1
AFE:	LOCATION: BORGER, TX
DWG. NO: SIMPLIFIED BLOCK	REV. 1

030220.1419 Bill SIMPLIFIED BLOCK.DWG

3. AREA MAP

Area Map



Legend

- Property Line
- Residential Area
- School

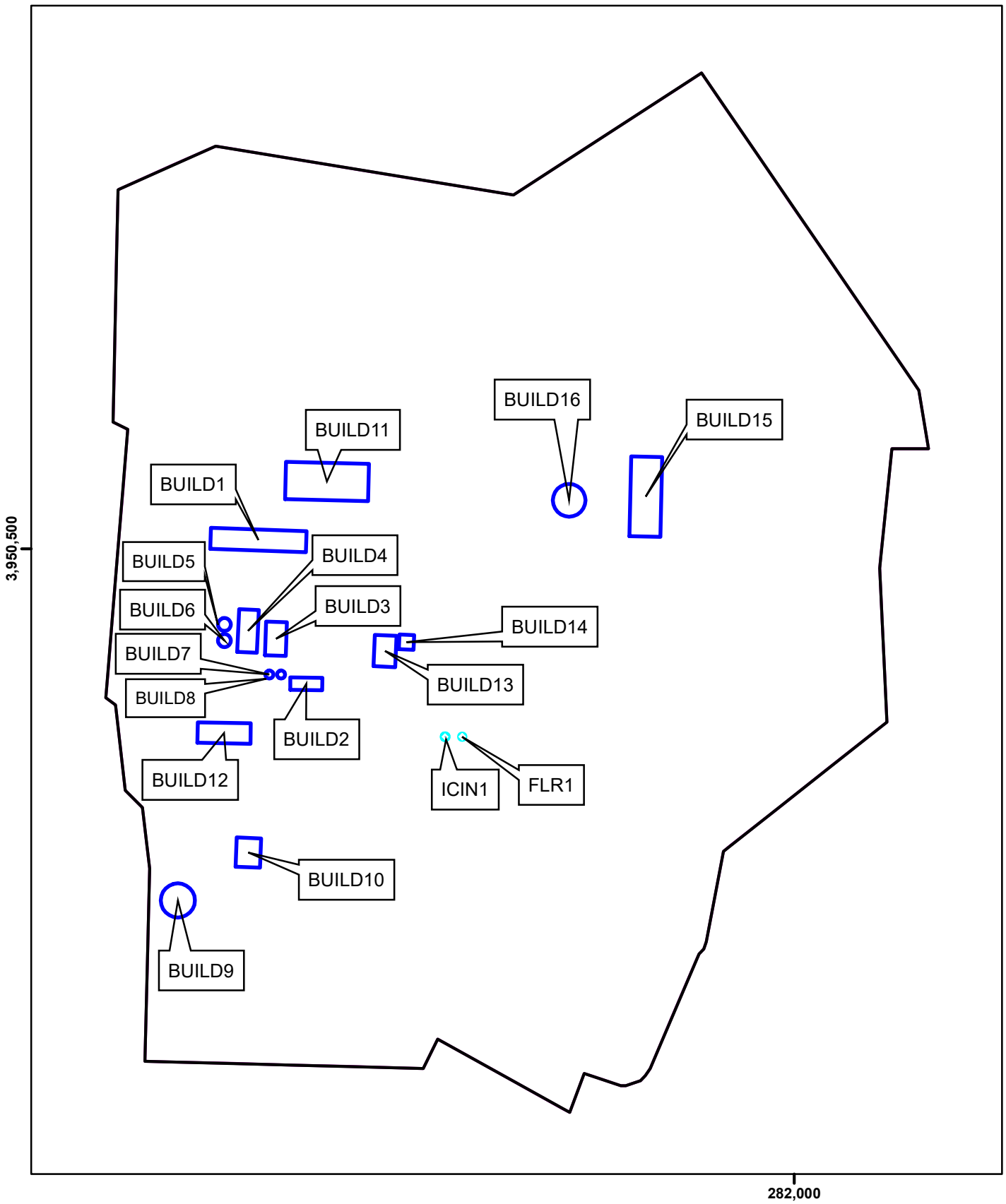
0 750 1,500 3,000 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

4. PLOT PLAN

Plot Plan



Legend

- Property Line
- Building
- Point Source

0 125 250 500 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

5. TCEQ FORM OP-CRO1

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: RN100216613	
CN: CN605745843	
Account No.: HW-0020-F	
Permit No.: O-2449	
Project No.: 30874	
Area Name: Rock Creek Gas Plant	
Company Name: IACX Rock Creek LLC	
II. Certification Type *(Please mark appropriate box)*	
☒ Responsible Official Representative	☐ Duly Authorized Representative
III. Submittal Type *(Please mark appropriate box) (Only one response can be accepted per form)*	
☐ 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, Justin Wheeler certify that I am the RO

(Certifier Name printed or typed) *(RO or DAR)*

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:
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).

Time Period: From _____ to _____

(Start Date) *(End Date)*

Specific Dates: 09/26/2024 _____

(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

_____ _____

(Date 5) *(Date 6)*

Signature: _____ Signature Date: _____

Title: Director of EHS

_____

6. TCEQ FORM OP-2

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: September 26, 2024	
Permit No.: O-2249	
Regulated Entity No.: RN100216613	
Company Name: IACX Rock Creek 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	☒ SO_2	☐ PM_{10}	☒ 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: September 26, 2024
Permit No.: O-2449
Regulated Entity No.: RN100216613
Company Name: IACX Rock Creek 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	MS-C	No	FLR1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217
2	MS-C	No	INCIN1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

7. TCEQ FORM OP-REQ3

Applicable Requirements Summary

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

Table 1a: Additions

Date: 09/26/2024	**Regulated Entity No.:** RN100216613	**Permit No.: O-2449**
Company Name: IACX Rock Creek LLC	**Area Name: Rock Creek 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	FLR1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217
2	INCIN1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217

8. TCEQ FORM OP-SUMR

Individual Unit 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.
09/26/2024	3131A	RN100216613

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
A	1	FLR1	OP-UA1	Acid Gas Flare		3131A	
A	2	INCIN1	OP-UA1	Acid Gas Incinerator		3131A	

9. TCEQ FORM OP-UA1

Miscellaneous and Generic Unit Attributes

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

Date:	**09/26/2024**
Permit No.:	**O-2449**
Regulated Entity No.:	**RN100216613**

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
FLR1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

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
INCIN1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

SITE OPERATION PERMIT (SOP) MINOR MODIFICATION

IACX Rock Creek LLC > Rock Creek Gas Plant

Prepared By:

Katie Jeziorski – Managing Consultant
Stephen Beene – Senior Consultant
Hunter Lohrenz – Consultant

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(b) Acid Gas Flare (EPN FLR1) emissions may not exceed 140.00 lb/hr sulfur dioxide (SO_2).

(c) Acid Gas Incinerator (EPN INCIN1) emissions may not exceed 140.00 lb/hr SO_2.

(d) The owner or operator may request an alternate means of control under the provisions of §112.232(k) of this title (relating to Control Requirements).

IACX understands the above requirements and this application is submitted to comply with the above requirements.

1.1.4 §122.213 Monitoring and Testing Requirements

(a) Monitoring requirements. The owner or operator shall continuously monitor, at a point prior to the manifold that directs gases to the Acid Gas Flare (EPN FLR1) or Acid Gas incinerator (EPN INCIN1), the gases routed to Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1) by using the following:

(1) monitor at a point the sulfur content of the gas stream as follows:

(A) using a separate dedicated analyzer capable of accurately measuring and recording total sulfur (including sulfur dioxide (SO_2), hydrogen sulfide (H_2S), and organic sulfur compounds levels) with an accuracy of ±5% on a continuous basis, the sulfur concentration must be determined in accordance 40 Code of Federal Regulations (CFR) §60.107a(e)(1) regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and hourly SO_2 emissions must be determined using the following equation; or

$$SO_2 = Scc \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2	=	Sulfur dioxide emissions in units of pounds per hour;
Scc	=	inlet sulfur compound concentration in cubic feet per 1,000,000 cubic feet of waste gas;
FFa	=	inlet waste gas stream flow in actual cubic feet per hour;
Psc	=	regulatory standard condition pressure of 14.7 pounds per square inch (psia);

Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet actual stream temperature in degrees Rankin

(B) using a separate dedicated analyzer capable of accurately measuring and recording H_2S to an accuracy of ±5% on a continuous basis, determine the H_2S concentration in the flared gas stream, derive an inlet flare or incinerator gas total sulfur concentration for each monitored hourly H_2S concentration in accordance 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and calculate the SO_2 emissions from the flare and the incinerator for each operating hour that either is operated using the following equation:

$$SO_2 = H_2Smc \times \frac{Scc}{H_2Ssc} \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2 = Sulfur dioxide emissions in units of pounds per hour;
H_2Smc = monitored inlet hydrogen sulfide (H_2S) concentration in units of cubic feet of flare gas inlet stream sulfur compounds per 1,000,000 cubic feet of waste gas;
Scc = inlet sulfur compound concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas derived in accordance with 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable;
H_2Ssc = sampled H_2S concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas;
FFa = inlet gas stream flow in units of actual cubic feet per hour;
Psc = regulatory standard condition pressure of 14.7 pounds per square inch (psia);
Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet stream actual temperature in degrees Rankin (the Tsc/Ta factor is used to convert FFa actual cubic feet to FFa standard cubic feet).

(C) a totalizing gas flow meter with an accuracy of ±5% that is installed, calibrated, maintained, and operated according to per the manufacturer's specifications directions to continuously measure and record the volume of gas directed to the Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1); and

(D) monitor the temperature of gases routed to the flare or incinerator using a temperature measurement device with an accuracy of ±1%; the inlet flare gas temperature measurement device must be installed, calibrated, maintained, and operated according to the manufacturer's recommendations and specifications.

(2) In lieu of the monitoring requirements of §112.213(a)(1) of this subsection, the owner or operator may install, calibrate, and maintain a continuous emissions monitoring system to monitor exhaust SO_2 from the Acid Gas Incinerator (EPN INCIN1) in accordance with the requirements of 40 CFR §60.13, 40 CFR Part 60, Appendix B, Performance Specification 2 and 6, for SO_2, and 40 CFR Part 60, Appendix F, quality assurance procedures;

(3) Continuous monitoring data collected in accordance with requirements in this subsection must undergo an appropriate quality assurance and quality control process and be validated for at least 95% of the time that the monitored emission point has emissions; an owner or operator must utilize an appropriate data substitution process based on the most accurate methodology available, which is at least equivalent to engineering judgment, to obtain all missing or invalidated monitoring data for the remaining period the monitored emission point has emissions.

(4) Minor modifications to monitoring methods may be approved by the executive director. Monitoring methods other than those specified in this section may be used if approved by the executive director and validated by 40 CFR Part 63, Appendix A, Test Method 301. For the purposes of this subsection, substitute "executive director" in each place that Test Method 301 references "administrator." These validation procedures may be waived by the executive director or a different protocol may be granted for site-specific applications. Minor modifications that may be approved under this subsection include increases in the frequency of monitoring provided appropriate quality assurance control, accuracy specifications, and data validation requirements are specified and no less stringent than monitoring requirements for a comparable EPN in this subchapter.

IACX understands the above monitoring requirements and will select one of the calculation options. However, IACX proposes to conduct periodic (weekly) sampling instead of continuous monitoring.

(b) Testing requirements.

(1) The owner of operator shall perform initial testing for monitoring devices required by subsection (a) of this section if documentation is not available to demonstrate initial tests have been conducted, as well as all subsequent testing, in accordance with the manufacturer's specifications to ensure that the required monitors are calibrated and function properly by the compliance date in §112.218 of this title (relating to Compliance Schedules).

(2) The owner or operator shall conduct initial performance testing by the compliance date in §112.218 of this title. During performance testing, the owner or operator shall operate the source at the maximum rated capacity, or as near thereto as practicable. The owner or operator shall conduct additional performance tests on the incinerator at least every five years after the compliance date to ensure the accuracy of the monitors for the gas stream sent to the incinerator or flare.

(3) The owner or operator shall conduct additional performance testing, if requested by the executive director, in compliance with 40 CFR §60.104a to demonstrate compliance with applicable emission limits or standards. The notification requirements of 40 CFR §60.8(d) apply to each initial performance test and to each subsequent performance test required by the executive director.

(4) All performance tests must be conducted using test methods allowed in §112.213(c).

IACX understands the above requirements and will conduct the required performance test.

(c) Approved test methods.

(1) Tests required under paragraph (b) of this section must be conducted using the test methods in 40 CFR Part 60, Appendices A-1 through A-8 and Appendix B or other methods as specified in this section, except as provided in §60.8(b).

(2) Sulfur dioxide in exhaust gases from the incinerator during testing must be determined using United States Environmental Protection Agency (EPA) Test Method 6 or 6C (40 CFR, Part 60, Appendix A).

(3) Alternate test methods as approved by the executive director and the EPA may be used.

The required performance test will follow the above test methods.

1.1.5 §122.216 Recordkeeping Requirements

The owner or operator shall maintain records in written or electronic format for a minimum of five years of the continuous monitoring of the sulfur content and flow rate of gases routed to either the flare or the incinerator as well as which control device was in use and of all monitoring data and emission calculations required under §112.213 of this title (relating to Monitoring Requirements). The owner or operator shall maintain records for a minimum of five years of all testing done for monitors and copies of each performance test conducted. The owner or operator shall maintain documentation for a minimum of five years of any period that emission limits or standards were exceeded and copies of required exceedance reports submitted to the appropriate Texas Commission on Environmental Quality Regional Office.

IACX understands the above requirements and will maintain the required records.

1.1.6 §122.217 Reporting Requirements

(a) For a source that is subject to an emissions limit in §112.212 of this title (relating to Control Requirements) and that exceeds an applicable emission limit or fails to meet a required stack parameter, the owner or shall submit to the Texas Commission on Environmental Quality (TCEQ) Regional Office for the area where the plant is located a report by March 31 of the year after an exceedance occurs documenting the excess emissions during the preceding calendar year, including at least the following:

(1) the date that each exceedance or failure to meet a required stack parameter occurred;

(2) an explanation of the exceedance or failure to meet a required stack parameter;

(3) a statement of whether the exceedance or failure to meet a required stack parameter was concurrent with a maintenance, startup, or shutdown period for, or malfunction of, an affected source or control system;

(4) a description of the action taken, if any; and

(5) a written statement, signed by the owner or operator, certifying the accuracy and completeness of the information contained in the report.

(b) The owner or operator shall submit a copy of each performance test report to the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction for the area where the plant is located within 60 days after completion of the test.

(c) After the effective date of a determination by the Environmental Protection Agency (EPA) that the Hutchinson County sulfur dioxide (SO_2) nonattainment area has failed to attain the 2010 one-hour SO_2 National Ambient Air Quality Standard or failed to meet reasonable further progress (RFP) pursuant to federal Clean Air Act §179(c), 42 United States Code §7509(c), the TCEQ will notify the owner or operator of the failure to attain and that the contingency measures in this subsection are triggered. Once notification is

received from the TCEQ, the owner or operator shall perform a full system audit (FSA) of all SO_2 sources subject to §112.210 of this title (relating to Applicability).

(1) Within 90 calendar days after the date of the notification, the owner or operator shall submit the FSA, including recommended provisional SO_2 emission control strategies as necessary, to the executive director of the TCEQ.

(2) As part of the FSA, the owner or operator shall conduct a root cause analysis of the circumstances surrounding the cause of the determination of failure to attain or failure to meet RFP, including a review and consideration of the following:

(A) for all causes of the determination of failure to attain or failure to meet RFP, at a minimum, hourly mass emissions of SO_2 from each SO_2 source subject to this division; and

(B) for a determination of failure to attain based on ambient air monitor data or modeling data, at a minimum, the meteorological conditions recorded at the monitor or other relevant meteorological data, including the frequency distribution of wind direction temporally correlated with SO_2 readings greater than 75 parts per billion at the monitor for which the EPA's determination of failure to attain was made; and any emissions event that may have occurred. The root cause analysis and associated records used to conduct the audit must consider information on the days that monitored exceedances occurred during the time period that the EPA evaluated in making the failure to attain determination.

IACX understands the above requirements and will follow applicable reporting requirements.

1.1.7 §122.218 Compliance Schedules

The owner or operator of a source subject to §112.210 of this title (relating to Applicability) shall comply with the requirements of this division no later than October 1, 2023.

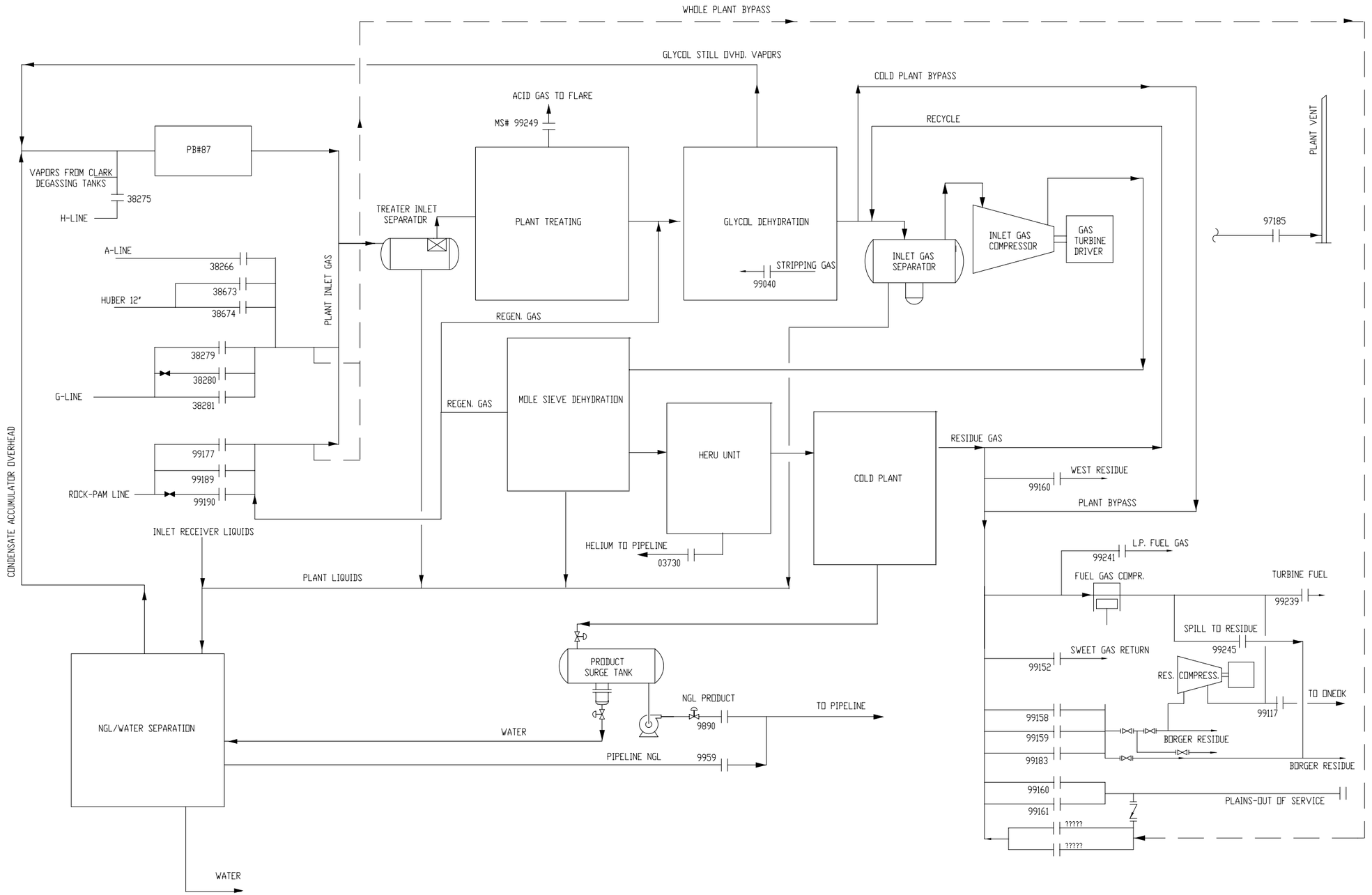
IACX submitted an amendment application for NSR permit No. 3131A to incorporate the 30 TAC 112 Subchapter F Division 2 requirements to obtain permit issuance by October 1, 2023.

1.2 APPLICATION CONTENTS

The enclosed SOP initial application for RFAB consists of the following TCEQ Forms and supplemental information:

- Section 2. Process Flow Diagram
- Section 3. Area Map
- Section 4. Plot Plan
- Section 5. Form OP-CRO1
- Section 6. Form OP-2
- Section 7. Form OP-REQ3
- Section 8. Form OP-SUMR
- Section 9. Form OP-UA1

2. PROCESS FLOW DIAGRAM



REFERENCE DRAWINGS:	NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
	1	16FEB07	INSTALL NEW BORDER	BRL			
	0		ORIGINAL ISSUE	MWT			

ROCK CREEK

ROCK CREEK PLANT

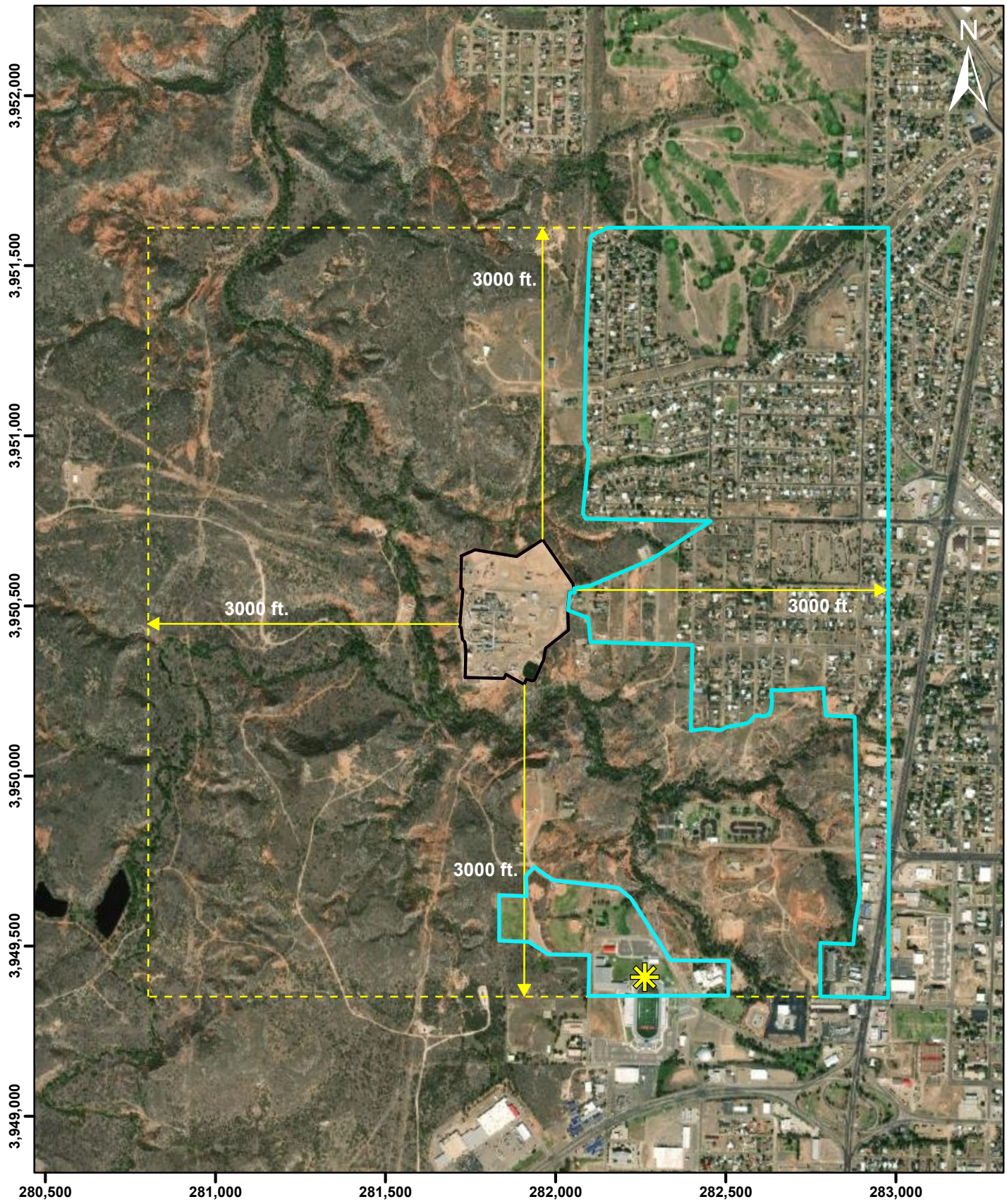
SIMPLIFIED BLOCK DIAGRAM

SCALE: NONE	PLOT SCALE: 1=1
AFE:	LOCATION: BORGER, TX
DWG. NO: SIMPLIFIED BLOCK	REV. 1

030220.1419 Bill SIMPLIFIED BLOCK.DWG

3. AREA MAP

Area Map



Legend

- Property Line
- Residential Area
- School

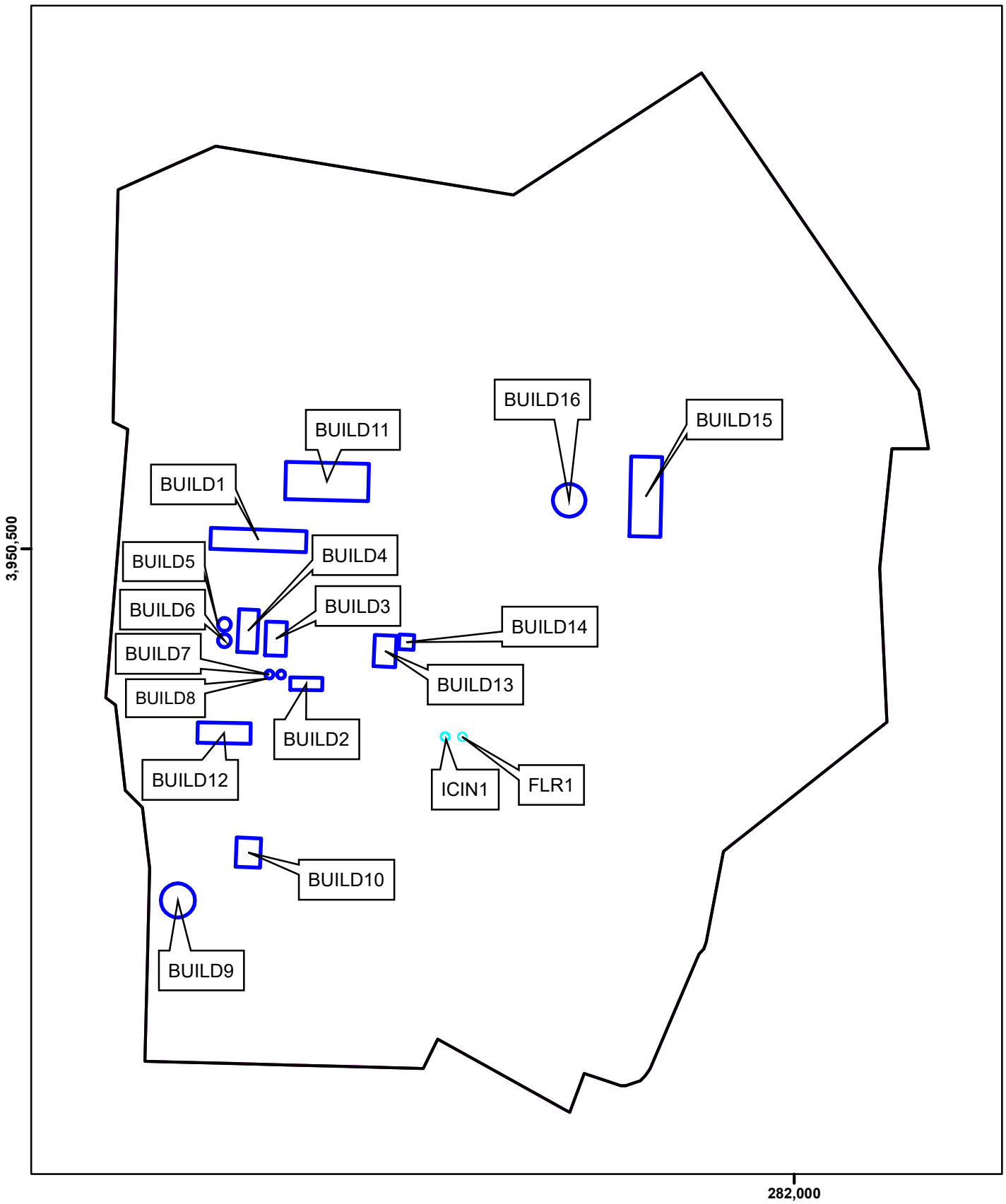
0 750 1,500 3,000 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

4. PLOT PLAN

Plot Plan



Legend

- Property Line
- Building
- Point Source

0 125 250 500 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

5. TCEQ FORM OP-CRO1

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: RN100216613	
CN: CN605745843	
Account No.: HW-0020-F	
Permit No.: O-2449	
Project No.: 30874	
Area Name: Rock Creek Gas Plant	
Company Name: IACX Rock Creek LLC	
II. Certification Type *(Please mark appropriate box)*	
☒ Responsible Official Representative	☐ Duly Authorized Representative
III. Submittal Type *(Please mark appropriate box) (Only one response can be accepted per form)*	
☐ 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, Justin Wheeler certify that I am the RO

(Certifier Name printed or typed) *(RO or DAR)*

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:
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).

Time Period: From _____ to _____

(Start Date) *(End Date)*

Specific Dates: 09/26/2024 _____

(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

_____ _____

(Date 5) *(Date 6)*

Signature: _____ Signature Date: _____

Title: Director of EHS

_____

6. TCEQ FORM OP-2

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: September 26, 2024	
Permit No.: O-2249	
Regulated Entity No.: RN100216613	
Company Name: IACX Rock Creek 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	☒ SO_2	☐ PM_{10}	☒ 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: September 26, 2024
Permit No.: O-2449
Regulated Entity No.: RN100216613
Company Name: IACX Rock Creek 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	MS-C	No	FLR1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217
2	MS-C	No	INCIN1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

7. TCEQ FORM OP-REQ3

Applicable Requirements Summary

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

Table 1a: Additions

Date: 09/26/2024	**Regulated Entity No.:** RN100216613	**Permit No.: O-2449**
Company Name: IACX Rock Creek LLC	**Area Name: Rock Creek 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	FLR1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217
2	INCIN1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217

8. TCEQ FORM OP-SUMR

Individual Unit 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.
09/26/2024	3131A	RN100216613

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
A	1	FLR1	OP-UA1	Acid Gas Flare		3131A	
A	2	INCIN1	OP-UA1	Acid Gas Incinerator		3131A	

9. TCEQ FORM OP-UA1

Miscellaneous and Generic Unit Attributes

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

Date:	**09/26/2024**
Permit No.:	**O-2449**
Regulated Entity No.:	**RN100216613**

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
FLR1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

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
INCIN1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

SITE OPERATION PERMIT (SOP) MINOR MODIFICATION

IACX Rock Creek LLC > Rock Creek Gas Plant

Prepared By:

Katie Jeziorski – Managing Consultant
Stephen Beene – Senior Consultant
Hunter Lohrenz – Consultant

TRINITY CONSULTANTS
12700 Park Central Drive
Suite 600
Dallas, Texas 75251
(972) 661-8100

September 2024

Project 244401.0136

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY

IACX Rock Creek LLC (IACX) owns and operates a gas plant located in Borger, Texas (Rock Creek Gas Plant). IACX operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 100216613. The Rock Creek Gas Plant has been assigned TCEQ Air Quality Account Number HW0020F and Regulated Entity Number (RN) 100216613. The site is authorized by New Source Review (NSR) Permit No. 3131A and various Permits By Rule (PBRs).

Hutchinson County is currently an attainment or unclassified area for all criteria pollutants except for SO_2. The Rock Creek Gas Plant is an existing a major source with respect to Prevention of Significant Deterioration (PSD). The Nonattainment New Source Review (NNSR) program is not applicable to the Rock Creek Gas Plant. The Rock Creek Gas Plant operates under the federal operating permit program (Title V) due to potential emissions of volatile organic compounds (VOC), oxides of nitrogen (NOX), sulfur dioxide (SO2), and carbon monoxide (CO). The IACX Rock Creek Gas Plant currently operates under Site Operating Permit (SOP) / Title V Permit No. O-2449.

With this application, IACX requests to modify Title V Permit No. O-2449. Rock Creek is located in the Hutchinson County SO2 Nonattainment area and is subject to the requirements listed in Texas Administrative Code (TAC) Section 112, Subchapter F, Division 2. Therefore, the current Title V Permit is being modified to include the Section 112 requirements and associated New Source Review (NSR) modifications.

1.1 30 TAC Chapter 112

How the Rock Creek Gas Plant will comply with the 30 TAC 112, Subchapter F, Division 2 requirements is discussed below.

1.1.1 §112.210 Applicability

(a) The requirements in this division apply to affected sources at the IACX Rock Creek Gas Plant, which is located at 1000 West Tenth Street in Borger, Texas in the Hutchinson County sulfur dioxide nonattainment area. Affected sources will remain subject to this division regardless of ownership, operational control, or other documentation changes.

(b) Affected sources are designated by the source name and emission point number (EPN) used in the site's New Source Review (NSR) permit as issued on the specified date. The specific affected sources are as follows:

(1) Acid Gas Flare (EPN FLR1) in NSR Permit 3131A dated July 12, 2011; and
(2) Acid Gas Incinerator (EPN INCIN1) in NSR Permit 3131A dated July 12, 2011.

IACX understands the Rock Creek Gas Plant is an applicable site under this rule.

1.1.2 §122.211 Definition

Unless specifically defined in the Texas Clean Air Act (Texas Health and Safety Code, Chapter 382), or in §101.1 or §112.1 of this title (relating to Definitions, respectively), the terms in this division have the meanings commonly used in the field of air pollution control. The following meanings apply in this division unless the context clearly indicates otherwise.

(1) Block one-hour average - An hourly average of data, collected starting at the beginning of each clock hour of the day and continuing until the start of the next clock hour (e.g., from 12:00:00 to 12:59:59).
(2) Continuous Monitoring - Monitoring for which readings are recorded at least once every 15 minutes.
(3) Hutchinson County sulfur dioxide (SO_2) nonattainment area--The portion of Hutchinson County designated by the United States Environmental Protection Agency (EPA) as nonattainment for the 2010 SO_2 National Ambient Air Quality Standard, 40 Code of Federal Regulations §81.344.

IACX understands the above requirements.

1.1.3 §122.212 Control Requirements

(a) Acid Gas Flare (EPN FLR1) and Acid Gas Incinerator (EPN INCIN1) may not operate simultaneously.

(b) Acid Gas Flare (EPN FLR1) emissions may not exceed 140.00 lb/hr sulfur dioxide (SO_2).

(c) Acid Gas Incinerator (EPN INCIN1) emissions may not exceed 140.00 lb/hr SO_2.

(d) The owner or operator may request an alternate means of control under the provisions of §112.232(k) of this title (relating to Control Requirements).

IACX understands the above requirements and this application is submitted to comply with the above requirements.

1.1.4 §122.213 Monitoring and Testing Requirements

(a) Monitoring requirements. The owner or operator shall continuously monitor, at a point prior to the manifold that directs gases to the Acid Gas Flare (EPN FLR1) or Acid Gas incinerator (EPN INCIN1), the gases routed to Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1) by using the following:

(1) monitor at a point the sulfur content of the gas stream as follows:

(A) using a separate dedicated analyzer capable of accurately measuring and recording total sulfur (including sulfur dioxide (SO_2), hydrogen sulfide (H_2S), and organic sulfur compounds levels) with an accuracy of ±5% on a continuous basis, the sulfur concentration must be determined in accordance 40 Code of Federal Regulations (CFR) §60.107a(e)(1) regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and hourly SO_2 emissions must be determined using the following equation; or

$$SO_2 = Scc \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2	=	Sulfur dioxide emissions in units of pounds per hour;
Scc	=	inlet sulfur compound concentration in cubic feet per 1,000,000 cubic feet of waste gas;
FFa	=	inlet waste gas stream flow in actual cubic feet per hour;
Psc	=	regulatory standard condition pressure of 14.7 pounds per square inch (psia);

Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet actual stream temperature in degrees Rankin

(B) using a separate dedicated analyzer capable of accurately measuring and recording H_2S to an accuracy of ±5% on a continuous basis, determine the H_2S concentration in the flared gas stream, derive an inlet flare or incinerator gas total sulfur concentration for each monitored hourly H_2S concentration in accordance 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and calculate the SO_2 emissions from the flare and the incinerator for each operating hour that either is operated using the following equation:

$$SO_2 = H_2Smc \times \frac{Scc}{H_2Ssc} \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2 = Sulfur dioxide emissions in units of pounds per hour;
H_2Smc = monitored inlet hydrogen sulfide (H_2S) concentration in units of cubic feet of flare gas inlet stream sulfur compounds per 1,000,000 cubic feet of waste gas;
Scc = inlet sulfur compound concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas derived in accordance with 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable;
H_2Ssc = sampled H_2S concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas;
FFa = inlet gas stream flow in units of actual cubic feet per hour;
Psc = regulatory standard condition pressure of 14.7 pounds per square inch (psia);
Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet stream actual temperature in degrees Rankin (the Tsc/Ta factor is used to convert FFa actual cubic feet to FFa standard cubic feet).

(C) a totalizing gas flow meter with an accuracy of ±5% that is installed, calibrated, maintained, and operated according to per the manufacturer's specifications directions to continuously measure and record the volume of gas directed to the Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1); and

(D) monitor the temperature of gases routed to the flare or incinerator using a temperature measurement device with an accuracy of ±1%; the inlet flare gas temperature measurement device must be installed, calibrated, maintained, and operated according to the manufacturer's recommendations and specifications.

(2) In lieu of the monitoring requirements of §112.213(a)(1) of this subsection, the owner or operator may install, calibrate, and maintain a continuous emissions monitoring system to monitor exhaust SO_2 from the Acid Gas Incinerator (EPN INCIN1) in accordance with the requirements of 40 CFR §60.13, 40 CFR Part 60, Appendix B, Performance Specification 2 and 6, for SO_2, and 40 CFR Part 60, Appendix F, quality assurance procedures;

(3) Continuous monitoring data collected in accordance with requirements in this subsection must undergo an appropriate quality assurance and quality control process and be validated for at least 95% of the time that the monitored emission point has emissions; an owner or operator must utilize an appropriate data substitution process based on the most accurate methodology available, which is at least equivalent to engineering judgment, to obtain all missing or invalidated monitoring data for the remaining period the monitored emission point has emissions.

(4) Minor modifications to monitoring methods may be approved by the executive director. Monitoring methods other than those specified in this section may be used if approved by the executive director and validated by 40 CFR Part 63, Appendix A, Test Method 301. For the purposes of this subsection, substitute "executive director" in each place that Test Method 301 references "administrator." These validation procedures may be waived by the executive director or a different protocol may be granted for site-specific applications. Minor modifications that may be approved under this subsection include increases in the frequency of monitoring provided appropriate quality assurance control, accuracy specifications, and data validation requirements are specified and no less stringent than monitoring requirements for a comparable EPN in this subchapter.

IACX understands the above monitoring requirements and will select one of the calculation options. However, IACX proposes to conduct periodic (weekly) sampling instead of continuous monitoring.

(b) Testing requirements.

(1) The owner of operator shall perform initial testing for monitoring devices required by subsection (a) of this section if documentation is not available to demonstrate initial tests have been conducted, as well as all subsequent testing, in accordance with the manufacturer's specifications to ensure that the required monitors are calibrated and function properly by the compliance date in §112.218 of this title (relating to Compliance Schedules).

(2) The owner or operator shall conduct initial performance testing by the compliance date in §112.218 of this title. During performance testing, the owner or operator shall operate the source at the maximum rated capacity, or as near thereto as practicable. The owner or operator shall conduct additional performance tests on the incinerator at least every five years after the compliance date to ensure the accuracy of the monitors for the gas stream sent to the incinerator or flare.

(3) The owner or operator shall conduct additional performance testing, if requested by the executive director, in compliance with 40 CFR §60.104a to demonstrate compliance with applicable emission limits or standards. The notification requirements of 40 CFR §60.8(d) apply to each initial performance test and to each subsequent performance test required by the executive director.

(4) All performance tests must be conducted using test methods allowed in §112.213(c).

IACX understands the above requirements and will conduct the required performance test.

(c) Approved test methods.

(1) Tests required under paragraph (b) of this section must be conducted using the test methods in 40 CFR Part 60, Appendices A-1 through A-8 and Appendix B or other methods as specified in this section, except as provided in §60.8(b).

(2) Sulfur dioxide in exhaust gases from the incinerator during testing must be determined using United States Environmental Protection Agency (EPA) Test Method 6 or 6C (40 CFR, Part 60, Appendix A).

(3) Alternate test methods as approved by the executive director and the EPA may be used.

The required performance test will follow the above test methods.

1.1.5 §122.216 Recordkeeping Requirements

The owner or operator shall maintain records in written or electronic format for a minimum of five years of the continuous monitoring of the sulfur content and flow rate of gases routed to either the flare or the incinerator as well as which control device was in use and of all monitoring data and emission calculations required under §112.213 of this title (relating to Monitoring Requirements). The owner or operator shall maintain records for a minimum of five years of all testing done for monitors and copies of each performance test conducted. The owner or operator shall maintain documentation for a minimum of five years of any period that emission limits or standards were exceeded and copies of required exceedance reports submitted to the appropriate Texas Commission on Environmental Quality Regional Office.

IACX understands the above requirements and will maintain the required records.

1.1.6 §122.217 Reporting Requirements

(a) For a source that is subject to an emissions limit in §112.212 of this title (relating to Control Requirements) and that exceeds an applicable emission limit or fails to meet a required stack parameter, the owner or shall submit to the Texas Commission on Environmental Quality (TCEQ) Regional Office for the area where the plant is located a report by March 31 of the year after an exceedance occurs documenting the excess emissions during the preceding calendar year, including at least the following:

(1) the date that each exceedance or failure to meet a required stack parameter occurred;

(2) an explanation of the exceedance or failure to meet a required stack parameter;

(3) a statement of whether the exceedance or failure to meet a required stack parameter was concurrent with a maintenance, startup, or shutdown period for, or malfunction of, an affected source or control system;

(4) a description of the action taken, if any; and

(5) a written statement, signed by the owner or operator, certifying the accuracy and completeness of the information contained in the report.

(b) The owner or operator shall submit a copy of each performance test report to the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction for the area where the plant is located within 60 days after completion of the test.

(c) After the effective date of a determination by the Environmental Protection Agency (EPA) that the Hutchinson County sulfur dioxide (SO_2) nonattainment area has failed to attain the 2010 one-hour SO_2 National Ambient Air Quality Standard or failed to meet reasonable further progress (RFP) pursuant to federal Clean Air Act §179(c), 42 United States Code §7509(c), the TCEQ will notify the owner or operator of the failure to attain and that the contingency measures in this subsection are triggered. Once notification is

received from the TCEQ, the owner or operator shall perform a full system audit (FSA) of all SO_2 sources subject to §112.210 of this title (relating to Applicability).

(1) Within 90 calendar days after the date of the notification, the owner or operator shall submit the FSA, including recommended provisional SO_2 emission control strategies as necessary, to the executive director of the TCEQ.

(2) As part of the FSA, the owner or operator shall conduct a root cause analysis of the circumstances surrounding the cause of the determination of failure to attain or failure to meet RFP, including a review and consideration of the following:

(A) for all causes of the determination of failure to attain or failure to meet RFP, at a minimum, hourly mass emissions of SO_2 from each SO_2 source subject to this division; and

(B) for a determination of failure to attain based on ambient air monitor data or modeling data, at a minimum, the meteorological conditions recorded at the monitor or other relevant meteorological data, including the frequency distribution of wind direction temporally correlated with SO_2 readings greater than 75 parts per billion at the monitor for which the EPA's determination of failure to attain was made; and any emissions event that may have occurred. The root cause analysis and associated records used to conduct the audit must consider information on the days that monitored exceedances occurred during the time period that the EPA evaluated in making the failure to attain determination.

IACX understands the above requirements and will follow applicable reporting requirements.

1.1.7 §122.218 Compliance Schedules

The owner or operator of a source subject to §112.210 of this title (relating to Applicability) shall comply with the requirements of this division no later than October 1, 2023.

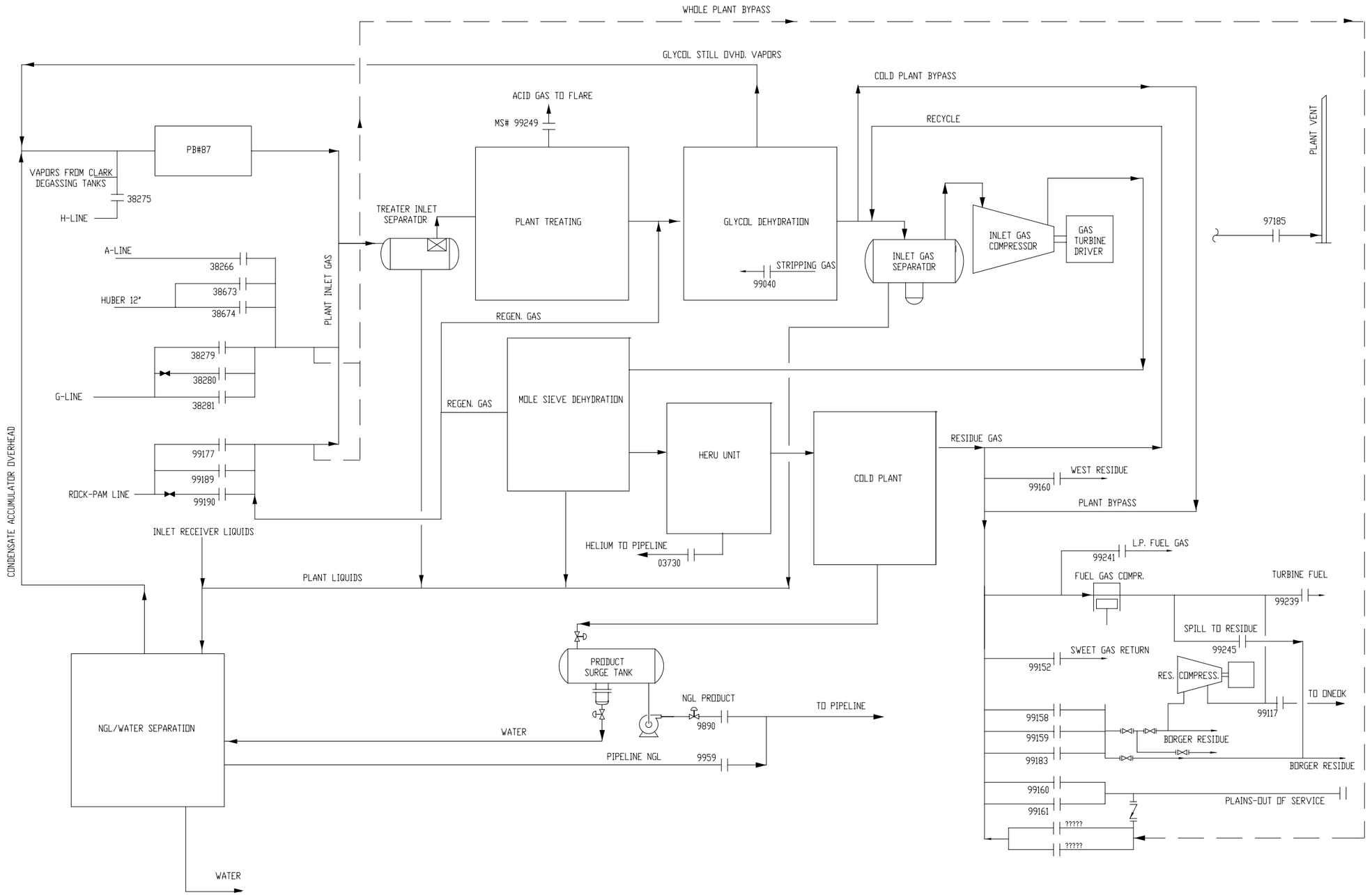
IACX submitted an amendment application for NSR permit No. 3131A to incorporate the 30 TAC 112 Subchapter F Division 2 requirements to obtain permit issuance by October 1, 2023.

1.2 APPLICATION CONTENTS

The enclosed SOP initial application for RFAB consists of the following TCEQ Forms and supplemental information:

- Section 2. Process Flow Diagram
- Section 3. Area Map
- Section 4. Plot Plan
- Section 5. Form OP-CRO1
- Section 6. Form OP-2
- Section 7. Form OP-REQ3
- Section 8. Form OP-SUMR
- Section 9. Form OP-UA1

2. PROCESS FLOW DIAGRAM



REFERENCE DRAWINGS:	NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
	1	16FEB07	INSTALL NEW BORDER	BRL			
	0		ORIGINAL ISSUE	MWT			

ROCK CREEK

ROCK CREEK PLANT

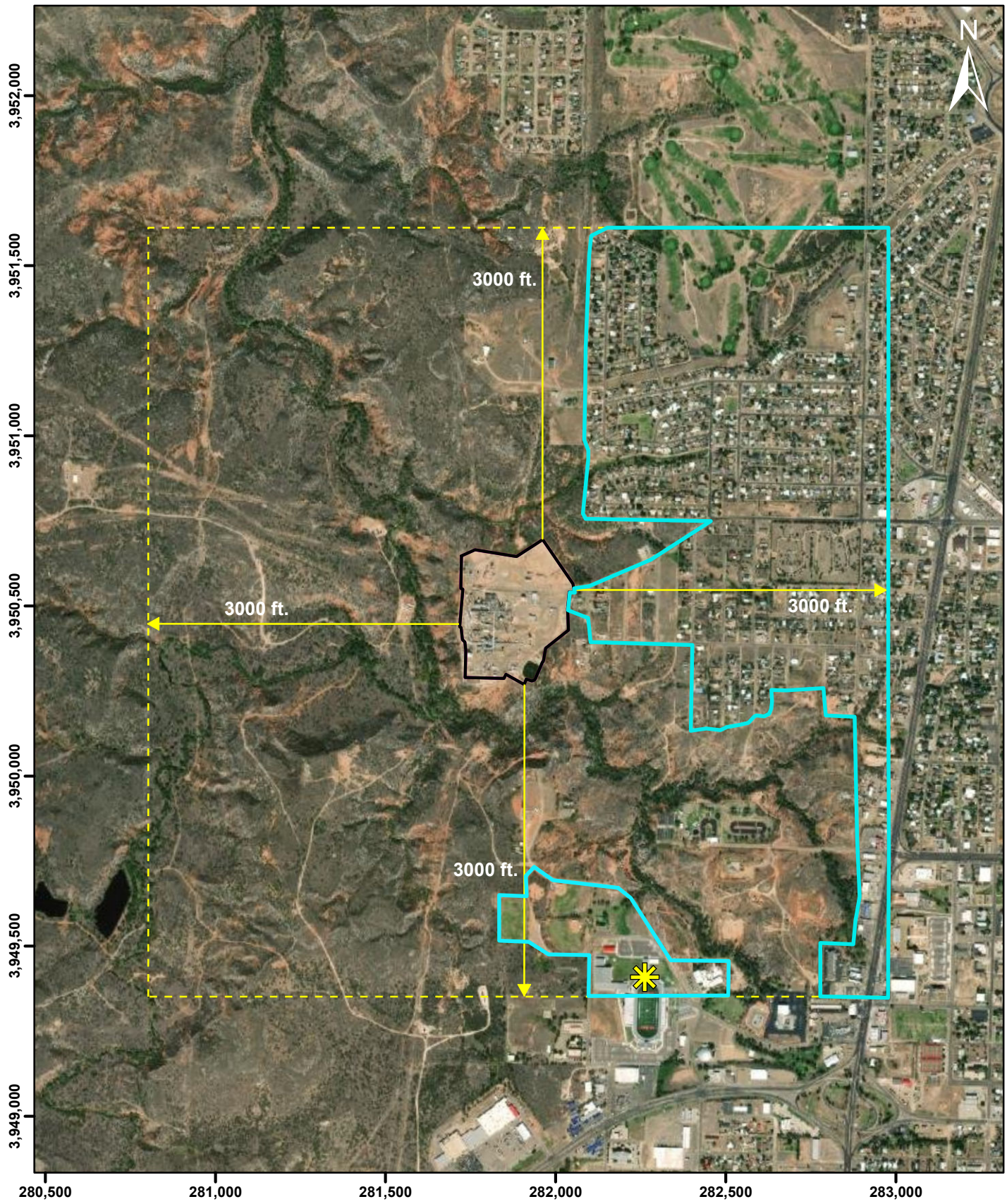
SIMPLIFIED BLOCK DIAGRAM

SCALE: NONE	PLOT SCALE: 1=1
AFE:	LOCATION: BORGER, TX
DWG. NO: SIMPLIFIED BLOCK	REV. 1

030220.1419 Bill SIMPLIFIED BLOCK.DWG

3. AREA MAP

Area Map



Legend

- Property Line
- Residential Area
- School

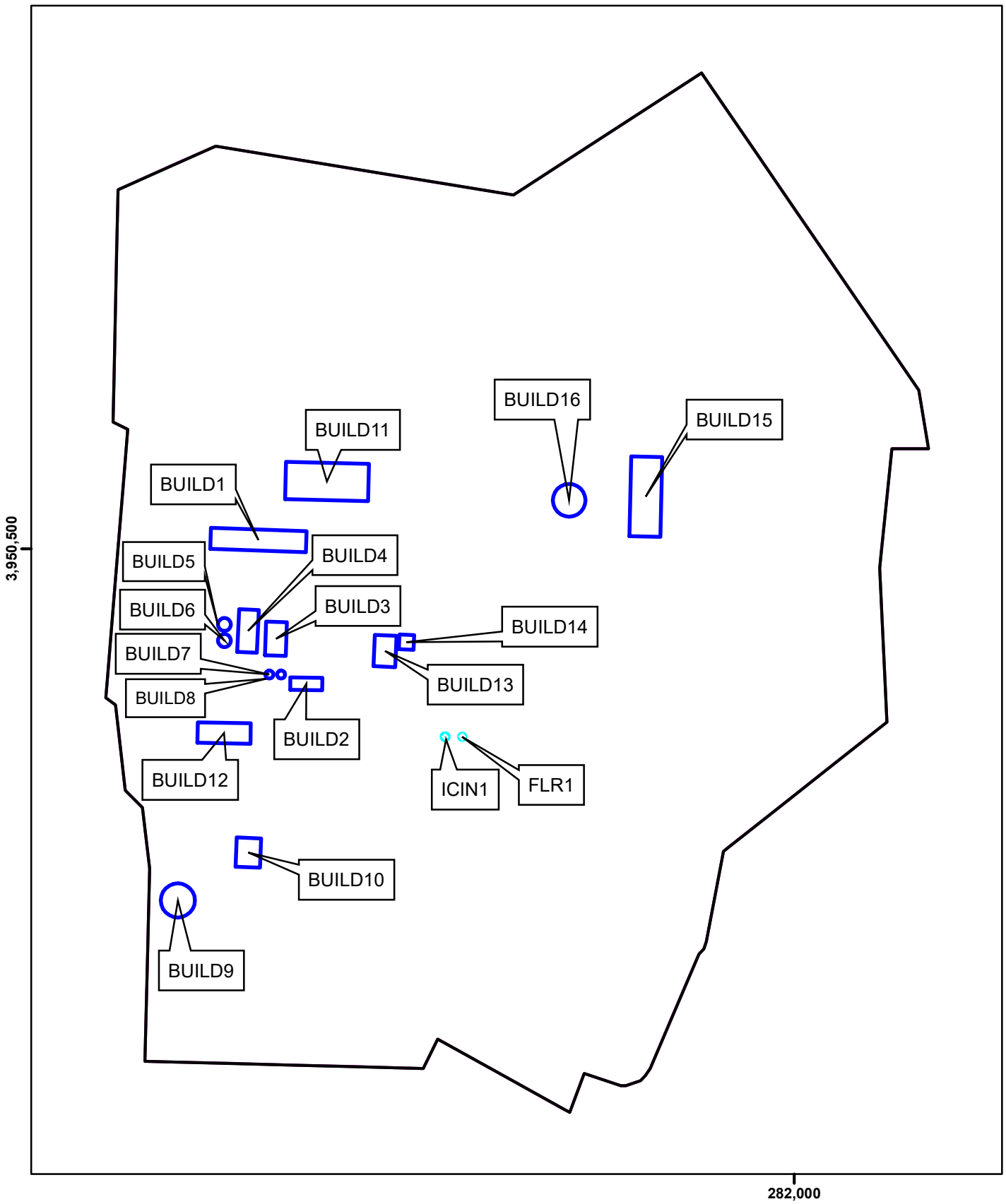
0 750 1,500 3,000 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

4. PLOT PLAN

Plot Plan



Legend

- Property Line
- Building
- Point Source

0 125 250 500 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

5. TCEQ FORM OP-CRO1

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: RN100216613	
CN: CN605745843	
Account No.: HW-0020-F	
Permit No.: O-2449	
Project No.: 30874	
Area Name: Rock Creek Gas Plant	
Company Name: IACX Rock Creek LLC	
II. Certification Type *(Please mark appropriate box)*	
☒ Responsible Official Representative	☐ Duly Authorized Representative
III. Submittal Type *(Please mark appropriate box) (Only one response can be accepted per form)*	
☐ 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, Justin Wheeler certify that I am the RO

(Certifier Name printed or typed) *(RO or DAR)*

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:
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).

Time Period: From _____ to _____

(Start Date) *(End Date)*

Specific Dates: 09/26/2024 _____

(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

_____ _____

(Date 5) *(Date 6)*

Signature: _____ Signature Date: _____

Title: Director of EHS

_____

6. TCEQ FORM OP-2

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: September 26, 2024	
Permit No.: O-2249	
Regulated Entity No.: RN100216613	
Company Name: IACX Rock Creek 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	☒ SO_2	☐ PM_{10}	☒ 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: September 26, 2024
Permit No.: O-2449
Regulated Entity No.: RN100216613
Company Name: IACX Rock Creek 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	MS-C	No	FLR1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217
2	MS-C	No	INCIN1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

7. TCEQ FORM OP-REQ3

Applicable Requirements Summary

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

Table 1a: Additions

Date: 09/26/2024	**Regulated Entity No.:** RN100216613	**Permit No.: O-2449**
Company Name: IACX Rock Creek LLC	**Area Name: Rock Creek 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	FLR1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217
2	INCIN1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217

8. TCEQ FORM OP-SUMR

Individual Unit 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.
09/26/2024	3131A	RN100216613

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
A	1	FLR1	OP-UA1	Acid Gas Flare		3131A	
A	2	INCIN1	OP-UA1	Acid Gas Incinerator		3131A	

9. TCEQ FORM OP-UA1

Miscellaneous and Generic Unit Attributes

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

Date:	**09/26/2024**
Permit No.:	**O-2449**
Regulated Entity No.:	**RN100216613**

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
FLR1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

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
INCIN1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

SITE OPERATION PERMIT (SOP) MINOR MODIFICATION

IACX Rock Creek LLC > Rock Creek Gas Plant

Prepared By:

Katie Jeziorski – Managing Consultant
Stephen Beene – Senior Consultant
Hunter Lohrenz – Consultant

TRINITY CONSULTANTS
12700 Park Central Drive
Suite 600
Dallas, Texas 75251
(972) 661-8100

September 2024

Project 244401.0136

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY

IACX Rock Creek LLC (IACX) owns and operates a gas plant located in Borger, Texas (Rock Creek Gas Plant). IACX operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 100216613. The Rock Creek Gas Plant has been assigned TCEQ Air Quality Account Number HW0020F and Regulated Entity Number (RN) 100216613. The site is authorized by New Source Review (NSR) Permit No. 3131A and various Permits By Rule (PBRs).

Hutchinson County is currently an attainment or unclassified area for all criteria pollutants except for SO_2. The Rock Creek Gas Plant is an existing a major source with respect to Prevention of Significant Deterioration (PSD). The Nonattainment New Source Review (NNSR) program is not applicable to the Rock Creek Gas Plant. The Rock Creek Gas Plant operates under the federal operating permit program (Title V) due to potential emissions of volatile organic compounds (VOC), oxides of nitrogen (NOX), sulfur dioxide (SO2), and carbon monoxide (CO). The IACX Rock Creek Gas Plant currently operates under Site Operating Permit (SOP) / Title V Permit No. O-2449.

With this application, IACX requests to modify Title V Permit No. O-2449. Rock Creek is located in the Hutchinson County SO2 Nonattainment area and is subject to the requirements listed in Texas Administrative Code (TAC) Section 112, Subchapter F, Division 2. Therefore, the current Title V Permit is being modified to include the Section 112 requirements and associated New Source Review (NSR) modifications.

1.1 30 TAC Chapter 112

How the Rock Creek Gas Plant will comply with the 30 TAC 112, Subchapter F, Division 2 requirements is discussed below.

1.1.1 §112.210 Applicability

(a) The requirements in this division apply to affected sources at the IACX Rock Creek Gas Plant, which is located at 1000 West Tenth Street in Borger, Texas in the Hutchinson County sulfur dioxide nonattainment area. Affected sources will remain subject to this division regardless of ownership, operational control, or other documentation changes.

(b) Affected sources are designated by the source name and emission point number (EPN) used in the site's New Source Review (NSR) permit as issued on the specified date. The specific affected sources are as follows:

(1) Acid Gas Flare (EPN FLR1) in NSR Permit 3131A dated July 12, 2011; and
(2) Acid Gas Incinerator (EPN INCIN1) in NSR Permit 3131A dated July 12, 2011.

IACX understands the Rock Creek Gas Plant is an applicable site under this rule.

1.1.2 §122.211 Definition

Unless specifically defined in the Texas Clean Air Act (Texas Health and Safety Code, Chapter 382), or in §101.1 or §112.1 of this title (relating to Definitions, respectively), the terms in this division have the meanings commonly used in the field of air pollution control. The following meanings apply in this division unless the context clearly indicates otherwise.

(1) Block one-hour average - An hourly average of data, collected starting at the beginning of each clock hour of the day and continuing until the start of the next clock hour (e.g., from 12:00:00 to 12:59:59).
(2) Continuous Monitoring - Monitoring for which readings are recorded at least once every 15 minutes.
(3) Hutchinson County sulfur dioxide (SO_2) nonattainment area--The portion of Hutchinson County designated by the United States Environmental Protection Agency (EPA) as nonattainment for the 2010 SO_2 National Ambient Air Quality Standard, 40 Code of Federal Regulations §81.344.

IACX understands the above requirements.

1.1.3 §122.212 Control Requirements

(a) Acid Gas Flare (EPN FLR1) and Acid Gas Incinerator (EPN INCIN1) may not operate simultaneously.

(b) Acid Gas Flare (EPN FLR1) emissions may not exceed 140.00 lb/hr sulfur dioxide (SO_2).

(c) Acid Gas Incinerator (EPN INCIN1) emissions may not exceed 140.00 lb/hr SO_2.

(d) The owner or operator may request an alternate means of control under the provisions of §112.232(k) of this title (relating to Control Requirements).

IACX understands the above requirements and this application is submitted to comply with the above requirements.

1.1.4 §122.213 Monitoring and Testing Requirements

(a) Monitoring requirements. The owner or operator shall continuously monitor, at a point prior to the manifold that directs gases to the Acid Gas Flare (EPN FLR1) or Acid Gas incinerator (EPN INCIN1), the gases routed to Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1) by using the following:

(1) monitor at a point the sulfur content of the gas stream as follows:

(A) using a separate dedicated analyzer capable of accurately measuring and recording total sulfur (including sulfur dioxide (SO_2), hydrogen sulfide (H_2S), and organic sulfur compounds levels) with an accuracy of ±5% on a continuous basis, the sulfur concentration must be determined in accordance 40 Code of Federal Regulations (CFR) §60.107a(e)(1) regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and hourly SO_2 emissions must be determined using the following equation; or

$$SO_2 = Scc \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2	=	Sulfur dioxide emissions in units of pounds per hour;
Scc	=	inlet sulfur compound concentration in cubic feet per 1,000,000 cubic feet of waste gas;
FFa	=	inlet waste gas stream flow in actual cubic feet per hour;
Psc	=	regulatory standard condition pressure of 14.7 pounds per square inch (psia);

Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet actual stream temperature in degrees Rankin

(B) using a separate dedicated analyzer capable of accurately measuring and recording H_2S to an accuracy of ±5% on a continuous basis, determine the H_2S concentration in the flared gas stream, derive an inlet flare or incinerator gas total sulfur concentration for each monitored hourly H_2S concentration in accordance 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and calculate the SO_2 emissions from the flare and the incinerator for each operating hour that either is operated using the following equation:

$$SO_2 = H_2Smc \times \frac{Scc}{H_2Ssc} \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2 = Sulfur dioxide emissions in units of pounds per hour;
H_2Smc = monitored inlet hydrogen sulfide (H_2S) concentration in units of cubic feet of flare gas inlet stream sulfur compounds per 1,000,000 cubic feet of waste gas;
Scc = inlet sulfur compound concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas derived in accordance with 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable;
H_2Ssc = sampled H_2S concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas;
FFa = inlet gas stream flow in units of actual cubic feet per hour;
Psc = regulatory standard condition pressure of 14.7 pounds per square inch (psia);
Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet stream actual temperature in degrees Rankin (the Tsc/Ta factor is used to convert FFa actual cubic feet to FFa standard cubic feet).

(C) a totalizing gas flow meter with an accuracy of ±5% that is installed, calibrated, maintained, and operated according to per the manufacturer's specifications directions to continuously measure and record the volume of gas directed to the Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1); and

(D) monitor the temperature of gases routed to the flare or incinerator using a temperature measurement device with an accuracy of ±1%; the inlet flare gas temperature measurement device must be installed, calibrated, maintained, and operated according to the manufacturer's recommendations and specifications.

(2) In lieu of the monitoring requirements of §112.213(a)(1) of this subsection, the owner or operator may install, calibrate, and maintain a continuous emissions monitoring system to monitor exhaust SO_2 from the Acid Gas Incinerator (EPN INCIN1) in accordance with the requirements of 40 CFR §60.13, 40 CFR Part 60, Appendix B, Performance Specification 2 and 6, for SO_2, and 40 CFR Part 60, Appendix F, quality assurance procedures;

(3) Continuous monitoring data collected in accordance with requirements in this subsection must undergo an appropriate quality assurance and quality control process and be validated for at least 95% of the time that the monitored emission point has emissions; an owner or operator must utilize an appropriate data substitution process based on the most accurate methodology available, which is at least equivalent to engineering judgment, to obtain all missing or invalidated monitoring data for the remaining period the monitored emission point has emissions.

(4) Minor modifications to monitoring methods may be approved by the executive director. Monitoring methods other than those specified in this section may be used if approved by the executive director and validated by 40 CFR Part 63, Appendix A, Test Method 301. For the purposes of this subsection, substitute "executive director" in each place that Test Method 301 references "administrator." These validation procedures may be waived by the executive director or a different protocol may be granted for site-specific applications. Minor modifications that may be approved under this subsection include increases in the frequency of monitoring provided appropriate quality assurance control, accuracy specifications, and data validation requirements are specified and no less stringent than monitoring requirements for a comparable EPN in this subchapter.

IACX understands the above monitoring requirements and will select one of the calculation options. However, IACX proposes to conduct periodic (weekly) sampling instead of continuous monitoring.

(b) Testing requirements.

(1) The owner of operator shall perform initial testing for monitoring devices required by subsection (a) of this section if documentation is not available to demonstrate initial tests have been conducted, as well as all subsequent testing, in accordance with the manufacturer's specifications to ensure that the required monitors are calibrated and function properly by the compliance date in §112.218 of this title (relating to Compliance Schedules).

(2) The owner or operator shall conduct initial performance testing by the compliance date in §112.218 of this title. During performance testing, the owner or operator shall operate the source at the maximum rated capacity, or as near thereto as practicable. The owner or operator shall conduct additional performance tests on the incinerator at least every five years after the compliance date to ensure the accuracy of the monitors for the gas stream sent to the incinerator or flare.

(3) The owner or operator shall conduct additional performance testing, if requested by the executive director, in compliance with 40 CFR §60.104a to demonstrate compliance with applicable emission limits or standards. The notification requirements of 40 CFR §60.8(d) apply to each initial performance test and to each subsequent performance test required by the executive director.

(4) All performance tests must be conducted using test methods allowed in §112.213(c).

IACX understands the above requirements and will conduct the required performance test.

(c) Approved test methods.

(1) Tests required under paragraph (b) of this section must be conducted using the test methods in 40 CFR Part 60, Appendices A-1 through A-8 and Appendix B or other methods as specified in this section, except as provided in §60.8(b).

(2) Sulfur dioxide in exhaust gases from the incinerator during testing must be determined using United States Environmental Protection Agency (EPA) Test Method 6 or 6C (40 CFR, Part 60, Appendix A).

(3) Alternate test methods as approved by the executive director and the EPA may be used.

The required performance test will follow the above test methods.

1.1.5 §122.216 Recordkeeping Requirements

The owner or operator shall maintain records in written or electronic format for a minimum of five years of the continuous monitoring of the sulfur content and flow rate of gases routed to either the flare or the incinerator as well as which control device was in use and of all monitoring data and emission calculations required under §112.213 of this title (relating to Monitoring Requirements). The owner or operator shall maintain records for a minimum of five years of all testing done for monitors and copies of each performance test conducted. The owner or operator shall maintain documentation for a minimum of five years of any period that emission limits or standards were exceeded and copies of required exceedance reports submitted to the appropriate Texas Commission on Environmental Quality Regional Office.

IACX understands the above requirements and will maintain the required records.

1.1.6 §122.217 Reporting Requirements

(a) For a source that is subject to an emissions limit in §112.212 of this title (relating to Control Requirements) and that exceeds an applicable emission limit or fails to meet a required stack parameter, the owner or shall submit to the Texas Commission on Environmental Quality (TCEQ) Regional Office for the area where the plant is located a report by March 31 of the year after an exceedance occurs documenting the excess emissions during the preceding calendar year, including at least the following:

(1) the date that each exceedance or failure to meet a required stack parameter occurred;

(2) an explanation of the exceedance or failure to meet a required stack parameter;

(3) a statement of whether the exceedance or failure to meet a required stack parameter was concurrent with a maintenance, startup, or shutdown period for, or malfunction of, an affected source or control system;

(4) a description of the action taken, if any; and

(5) a written statement, signed by the owner or operator, certifying the accuracy and completeness of the information contained in the report.

(b) The owner or operator shall submit a copy of each performance test report to the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction for the area where the plant is located within 60 days after completion of the test.

(c) After the effective date of a determination by the Environmental Protection Agency (EPA) that the Hutchinson County sulfur dioxide (SO_2) nonattainment area has failed to attain the 2010 one-hour SO_2 National Ambient Air Quality Standard or failed to meet reasonable further progress (RFP) pursuant to federal Clean Air Act §179(c), 42 United States Code §7509(c), the TCEQ will notify the owner or operator of the failure to attain and that the contingency measures in this subsection are triggered. Once notification is

received from the TCEQ, the owner or operator shall perform a full system audit (FSA) of all SO_2 sources subject to §112.210 of this title (relating to Applicability).

(1) Within 90 calendar days after the date of the notification, the owner or operator shall submit the FSA, including recommended provisional SO_2 emission control strategies as necessary, to the executive director of the TCEQ.

(2) As part of the FSA, the owner or operator shall conduct a root cause analysis of the circumstances surrounding the cause of the determination of failure to attain or failure to meet RFP, including a review and consideration of the following:

(A) for all causes of the determination of failure to attain or failure to meet RFP, at a minimum, hourly mass emissions of SO_2 from each SO_2 source subject to this division; and

(B) for a determination of failure to attain based on ambient air monitor data or modeling data, at a minimum, the meteorological conditions recorded at the monitor or other relevant meteorological data, including the frequency distribution of wind direction temporally correlated with SO_2 readings greater than 75 parts per billion at the monitor for which the EPA's determination of failure to attain was made; and any emissions event that may have occurred. The root cause analysis and associated records used to conduct the audit must consider information on the days that monitored exceedances occurred during the time period that the EPA evaluated in making the failure to attain determination.

IACX understands the above requirements and will follow applicable reporting requirements.

1.1.7 §122.218 Compliance Schedules

The owner or operator of a source subject to §112.210 of this title (relating to Applicability) shall comply with the requirements of this division no later than October 1, 2023.

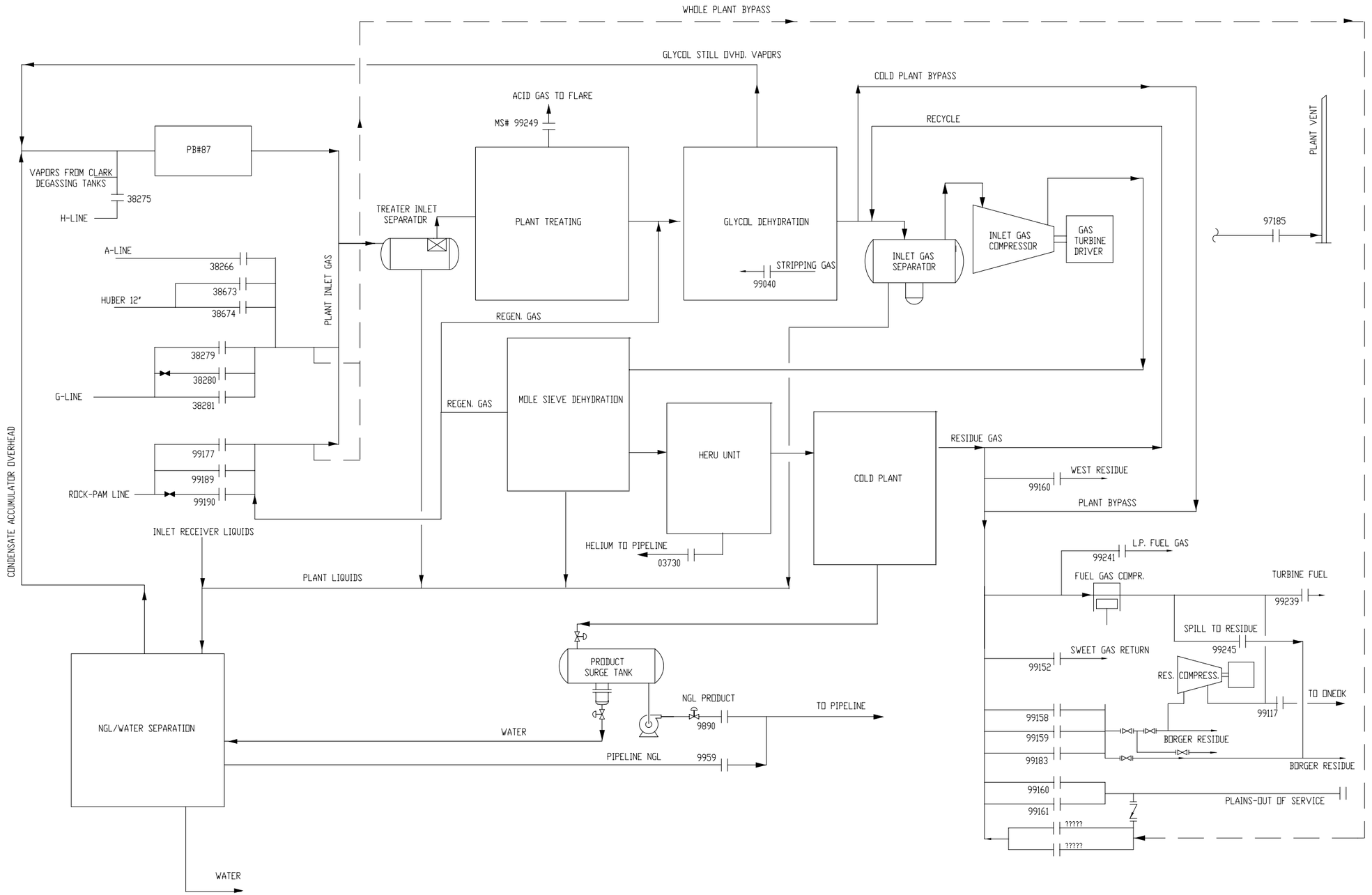
IACX submitted an amendment application for NSR permit No. 3131A to incorporate the 30 TAC 112 Subchapter F Division 2 requirements to obtain permit issuance by October 1, 2023.

1.2 APPLICATION CONTENTS

The enclosed SOP initial application for RFAB consists of the following TCEQ Forms and supplemental information:

- Section 2. Process Flow Diagram
- Section 3. Area Map
- Section 4. Plot Plan
- Section 5. Form OP-CRO1
- Section 6. Form OP-2
- Section 7. Form OP-REQ3
- Section 8. Form OP-SUMR
- Section 9. Form OP-UA1

2. PROCESS FLOW DIAGRAM



REFERENCE DRAWINGS:	NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
	1	16FEB07	INSTALL NEW BORDER	BRL			
	0		ORIGINAL ISSUE	MWT			

ROCK CREEK

ROCK CREEK PLANT

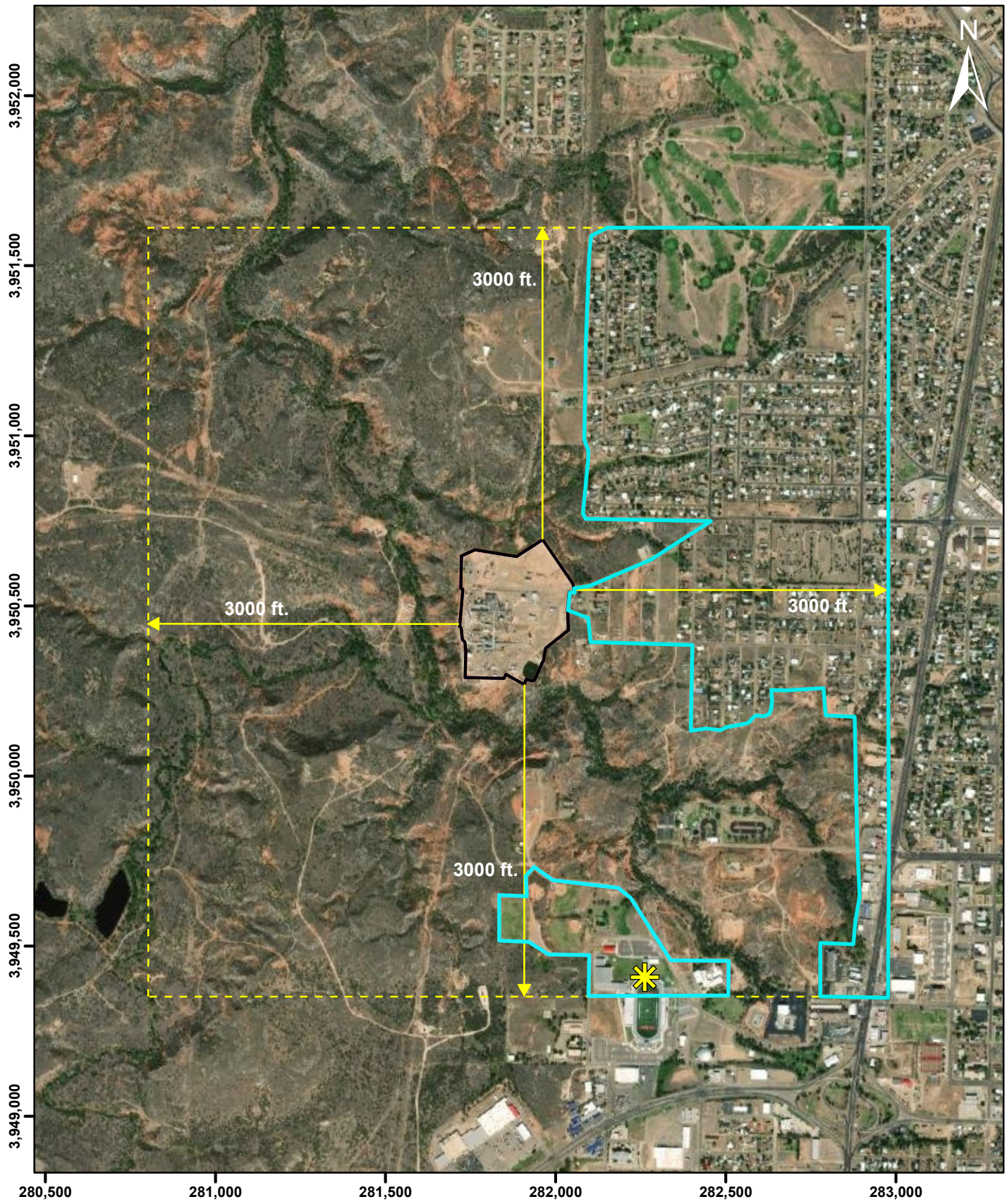
SIMPLIFIED BLOCK DIAGRAM

SCALE: NONE	PLOT SCALE: 1=1
AFE:	LOCATION: BORGER, TX
DWG. NO: SIMPLIFIED BLOCK	REV. 1

030220.1419 Bill SIMPLIFIED BLOCK.DWG

3. AREA MAP

Area Map



Legend

- Property Line
- Residential Area
- School

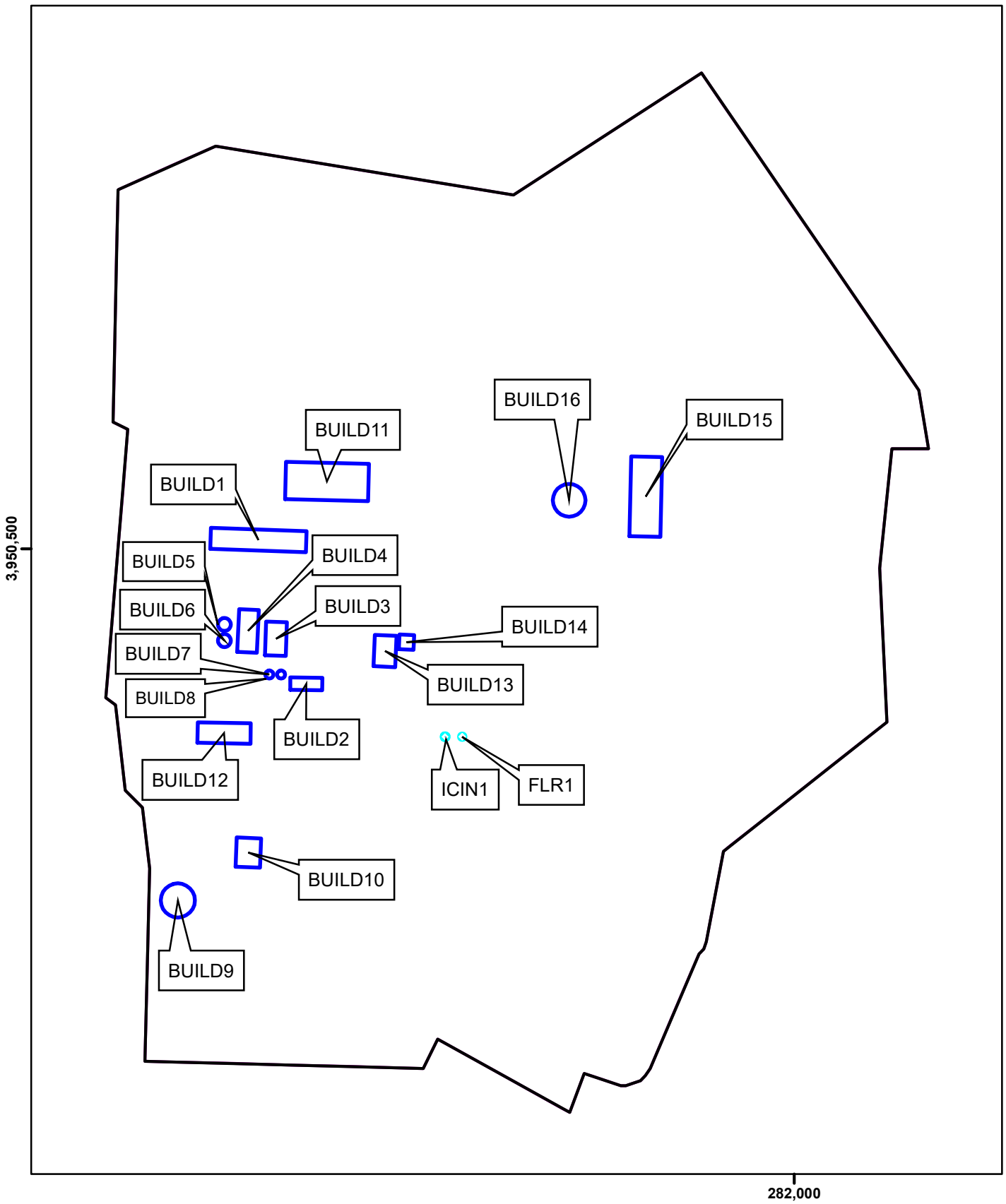
0 750 1,500 3,000 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

4. PLOT PLAN

Plot Plan



Legend

- Property Line
- Building
- Point Source

0 125 250 500 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

5. TCEQ FORM OP-CRO1

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: RN100216613	
CN: CN605745843	
Account No.: HW-0020-F	
Permit No.: O-2449	
Project No.: 30874	
Area Name: Rock Creek Gas Plant	
Company Name: IACX Rock Creek LLC	
II. Certification Type *(Please mark appropriate box)*	
☒ Responsible Official Representative	☐ Duly Authorized Representative
III. Submittal Type *(Please mark appropriate box) (Only one response can be accepted per form)*	
☐ 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, Justin Wheeler certify that I am the RO

(Certifier Name printed or typed) *(RO or DAR)*

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:
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).

Time Period: From _____ to _____

(Start Date) *(End Date)*

Specific Dates: 09/26/2024 _____

(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

_____ _____

(Date 5) *(Date 6)*

Signature: _____ Signature Date: _____

Title: Director of EHS

_____

6. TCEQ FORM OP-2

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: September 26, 2024	
Permit No.: O-2249	
Regulated Entity No.: RN100216613	
Company Name: IACX Rock Creek 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	☒ SO_2	☐ PM_{10}	☒ 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: September 26, 2024
Permit No.: O-2449
Regulated Entity No.: RN100216613
Company Name: IACX Rock Creek 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	MS-C	No	FLR1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217
2	MS-C	No	INCIN1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

7. TCEQ FORM OP-REQ3

Applicable Requirements Summary

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

Table 1a: Additions

Date: 09/26/2024	**Regulated Entity No.:** RN100216613	**Permit No.: O-2449**
Company Name: IACX Rock Creek LLC	**Area Name: Rock Creek 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	FLR1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217
2	INCIN1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217

8. TCEQ FORM OP-SUMR

Individual Unit 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.
09/26/2024	3131A	RN100216613

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
A	1	FLR1	OP-UA1	Acid Gas Flare		3131A	
A	2	INCIN1	OP-UA1	Acid Gas Incinerator		3131A	

9. TCEQ FORM OP-UA1

Miscellaneous and Generic Unit Attributes

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

Date:	**09/26/2024**
Permit No.:	**O-2449**
Regulated Entity No.:	**RN100216613**

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
FLR1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

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
INCIN1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

Texas Commission on Environmental Quality

Title V Existing

2449

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	ROCK CREEK GAS PLANT
Does the site have a physical address?	Yes
Physical Address	
Number and Street	1000 W 10TH ST
City	BORGER
State	TX
ZIP	79007
County	HUTCHINSON
Latitude (N) (##.######)	35.673888
Longitude (W) (-###.######)	101.410555
Primary SIC Code	1321
Secondary SIC Code	
Primary NAICS Code	211111
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100216613
What is the name of the Regulated Entity (RE)?	ROCK CREEK GAS PLANT
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	1000 W 10TH ST
City	BORGER
State	TX
ZIP	79007
County	HUTCHINSON
Latitude (N) (##.######)	35.673888
Longitude (W) (-###.######)	-101.410555
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)?	CN605745843
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	Iacx Rock Creek LLC
Texas SOS Filing Number	803314725
Federal Tax ID	
State Franchise Tax ID	32070671923
State Sales Tax ID	

Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	IACX ENERGY
Prefix	MR
First	JUSTIN
Middle	
Last	WHEELER
Suffix	
Credentials	
Title	DIRECTOR OF EHS
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5001 LBJ FWY STE 300
Routing (such as Mail Code, Dept., or Attn:)	
City	DALLAS
State	TX
ZIP	75244
Phone (###-###-####)	9726792147
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	justinwheeler@iacx.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	IACX Energy
Prefix	MR
First	Justin
Middle	
Last	Wheeler
Suffix	
Credentials	
Title	Director of EHS
Enter new address or copy one from list:	Responsible Official Contact
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	5001 LBJ FWY STE 300

Routing (such as Mail Code, Dept., or Attn:)	
City	DALLAS
State	TX
ZIP	75244
Phone (###-###-####)	9726792147
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	justinwheeler@iacx.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	35 Deg 40 Min 26 Sec
3) Permit Longitude Coordinate:	101 Deg 24 Min 38 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)

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

[File Properties]

File Name	OP_2_2024-0926 Rock Creek Title V Minor Revision.pdf
Hash	D714D483A6A8B5194A8D45652B22E4F4CFB29CD0E6D55557CDE296369500761E
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_2024-0926 Rock Creek Title V Minor Revision.pdf
Hash	D714D483A6A8B5194A8D45652B22E4F4CFB29CD0E6D55557CDE296369500761E
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_2024-0926 Rock Creek Title V Minor Revision.pdf
Hash	D714D483A6A8B5194A8D45652B22E4F4CFB29CD0E6D55557CDE296369500761E
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name	2024-0926 Rock Creek Title V Minor Revision.pdf
Hash	D714D483A6A8B5194A8D45652B22E4F4CFB29CD0E6D55557CDE296369500761E
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	2024-0926 Rock Creek Title V Minor Revision.pdf
Hash	D714D483A6A8B5194A8D45652B22E4F4CFB29CD0E6D55557CDE296369500761E
MIME-Type	application/pdf

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

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 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 Justin Wheeler, the owner of the STEERS account ER032955.
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 enforcemer 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 2449.
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: Justin Wheeler OWNER OPERATOR

Account Number:	ER032955
Signature IP Address:	99.27.202.41
Signature Date:	2024-09-26
Signature Hash:	DB5B36ACCD3B3BE0A257223A2E9109A867D831E5FCC9001B4D2FECFC77E04319
Form Hash Code at time of Signature:	D41D23C07FB6373016C9C78B9A73121D0214C8AA9A82F9C7D2F16D7AE1A5EB78

Submission

Reference Number:	The application reference number is 686413
Submitted by:	The application was submitted by ER032955/Justin Wheeler
Submitted Timestamp:	The application was submitted on 2024-09-26 at 15:36:08 CDT
Submitted From:	The application was submitted from IP address 99.27.202.41
Confirmation Number:	The confirmation number is 566557
Steers Version:	The STEERS version is 6.82
Permit Number:	The permit number is 2449

Additional Information

Application Creator: This account was created by Hunter J Lohrenz

SITE OPERATION PERMIT (SOP) MINOR MODIFICATION

IACX Rock Creek LLC > Rock Creek Gas Plant

Prepared By:

Katie Jeziorski – Managing Consultant
Stephen Beene – Senior Consultant
Hunter Lohrenz – Consultant

TRINITY CONSULTANTS
12700 Park Central Drive
Suite 600
Dallas, Texas 75251
(972) 661-8100

September 2024

Project 244401.0136

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY

IACX Rock Creek LLC (IACX) owns and operates a gas plant located in Borger, Texas (Rock Creek Gas Plant). IACX operates under Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) 100216613. The Rock Creek Gas Plant has been assigned TCEQ Air Quality Account Number HW0020F and Regulated Entity Number (RN) 100216613. The site is authorized by New Source Review (NSR) Permit No. 3131A and various Permits By Rule (PBRs).

Hutchinson County is currently an attainment or unclassified area for all criteria pollutants except for SO_2. The Rock Creek Gas Plant is an existing a major source with respect to Prevention of Significant Deterioration (PSD). The Nonattainment New Source Review (NNSR) program is not applicable to the Rock Creek Gas Plant. The Rock Creek Gas Plant operates under the federal operating permit program (Title V) due to potential emissions of volatile organic compounds (VOC), oxides of nitrogen (NOX), sulfur dioxide (SO2), and carbon monoxide (CO). The IACX Rock Creek Gas Plant currently operates under Site Operating Permit (SOP) / Title V Permit No. O-2449.

With this application, IACX requests to modify Title V Permit No. O-2449. Rock Creek is located in the Hutchinson County SO2 Nonattainment area and is subject to the requirements listed in Texas Administrative Code (TAC) Section 112, Subchapter F, Division 2. Therefore, the current Title V Permit is being modified to include the Section 112 requirements and associated New Source Review (NSR) modifications.

1.1 30 TAC Chapter 112

How the Rock Creek Gas Plant will comply with the 30 TAC 112, Subchapter F, Division 2 requirements is discussed below.

1.1.1 §112.210 Applicability

(a) The requirements in this division apply to affected sources at the IACX Rock Creek Gas Plant, which is located at 1000 West Tenth Street in Borger, Texas in the Hutchinson County sulfur dioxide nonattainment area. Affected sources will remain subject to this division regardless of ownership, operational control, or other documentation changes.

(b) Affected sources are designated by the source name and emission point number (EPN) used in the site's New Source Review (NSR) permit as issued on the specified date. The specific affected sources are as follows:

(1) Acid Gas Flare (EPN FLR1) in NSR Permit 3131A dated July 12, 2011; and
(2) Acid Gas Incinerator (EPN INCIN1) in NSR Permit 3131A dated July 12, 2011.

IACX understands the Rock Creek Gas Plant is an applicable site under this rule.

1.1.2 §122.211 Definition

Unless specifically defined in the Texas Clean Air Act (Texas Health and Safety Code, Chapter 382), or in §101.1 or §112.1 of this title (relating to Definitions, respectively), the terms in this division have the meanings commonly used in the field of air pollution control. The following meanings apply in this division unless the context clearly indicates otherwise.

(1) Block one-hour average - An hourly average of data, collected starting at the beginning of each clock hour of the day and continuing until the start of the next clock hour (e.g., from 12:00:00 to 12:59:59).
(2) Continuous Monitoring - Monitoring for which readings are recorded at least once every 15 minutes.
(3) Hutchinson County sulfur dioxide (SO_2) nonattainment area--The portion of Hutchinson County designated by the United States Environmental Protection Agency (EPA) as nonattainment for the 2010 SO_2 National Ambient Air Quality Standard, 40 Code of Federal Regulations §81.344.

IACX understands the above requirements.

1.1.3 §122.212 Control Requirements

(a) Acid Gas Flare (EPN FLR1) and Acid Gas Incinerator (EPN INCIN1) may not operate simultaneously.

(b) Acid Gas Flare (EPN FLR1) emissions may not exceed 140.00 lb/hr sulfur dioxide (SO_2).

(c) Acid Gas Incinerator (EPN INCIN1) emissions may not exceed 140.00 lb/hr SO_2.

(d) The owner or operator may request an alternate means of control under the provisions of §112.232(k) of this title (relating to Control Requirements).

IACX understands the above requirements and this application is submitted to comply with the above requirements.

1.1.4 §122.213 Monitoring and Testing Requirements

(a) Monitoring requirements. The owner or operator shall continuously monitor, at a point prior to the manifold that directs gases to the Acid Gas Flare (EPN FLR1) or Acid Gas incinerator (EPN INCIN1), the gases routed to Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1) by using the following:

(1) monitor at a point the sulfur content of the gas stream as follows:

(A) using a separate dedicated analyzer capable of accurately measuring and recording total sulfur (including sulfur dioxide (SO_2), hydrogen sulfide (H_2S), and organic sulfur compounds levels) with an accuracy of ±5% on a continuous basis, the sulfur concentration must be determined in accordance 40 Code of Federal Regulations (CFR) §60.107a(e)(1) regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and hourly SO_2 emissions must be determined using the following equation; or

$$SO_2 = Scc \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2	=	Sulfur dioxide emissions in units of pounds per hour;
Scc	=	inlet sulfur compound concentration in cubic feet per 1,000,000 cubic feet of waste gas;
FFa	=	inlet waste gas stream flow in actual cubic feet per hour;
Psc	=	regulatory standard condition pressure of 14.7 pounds per square inch (psia);

Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet actual stream temperature in degrees Rankin

(B) using a separate dedicated analyzer capable of accurately measuring and recording H_2S to an accuracy of ±5% on a continuous basis, determine the H_2S concentration in the flared gas stream, derive an inlet flare or incinerator gas total sulfur concentration for each monitored hourly H_2S concentration in accordance 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable or exempt the flare or incinerator, and calculate the SO_2 emissions from the flare and the incinerator for each operating hour that either is operated using the following equation:

$$SO_2 = H_2Smc \times \frac{Scc}{H_2Ssc} \times FFa \times \frac{Tsc}{Ta} \times \frac{Pa}{Psc} \times \frac{lb\ mole}{385.27\ scf} \times \frac{64.06\ lb\ SO_2}{lb\ mole}$$

Where:

SO_2 = Sulfur dioxide emissions in units of pounds per hour;
H_2Smc = monitored inlet hydrogen sulfide (H_2S) concentration in units of cubic feet of flare gas inlet stream sulfur compounds per 1,000,000 cubic feet of waste gas;
Scc = inlet sulfur compound concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas derived in accordance with 40 CFR §60.107a(e)(2) methodology regardless of whether these requirements are otherwise applicable;
H_2Ssc = sampled H_2S concentration in units of cubic feet of waste gas inlet stream sulfur compounds per 1,000,000 cubic feet of flare gas;
FFa = inlet gas stream flow in units of actual cubic feet per hour;
Psc = regulatory standard condition pressure of 14.7 pounds per square inch (psia);
Pa = FFa measurement pressure in units of psia;
Tsc = regulatory standard condition temperature of 528 degrees Rankin; and
Ta = inlet stream actual temperature in degrees Rankin (the Tsc/Ta factor is used to convert FFa actual cubic feet to FFa standard cubic feet).

(C) a totalizing gas flow meter with an accuracy of ±5% that is installed, calibrated, maintained, and operated according to per the manufacturer's specifications directions to continuously measure and record the volume of gas directed to the Acid Gas Flare (EPN FLR1) or Acid Gas Incinerator (EPN INCIN1); and

(D) monitor the temperature of gases routed to the flare or incinerator using a temperature measurement device with an accuracy of ±1%; the inlet flare gas temperature measurement device must be installed, calibrated, maintained, and operated according to the manufacturer's recommendations and specifications.

(2) In lieu of the monitoring requirements of §112.213(a)(1) of this subsection, the owner or operator may install, calibrate, and maintain a continuous emissions monitoring system to monitor exhaust SO_2 from the Acid Gas Incinerator (EPN INCIN1) in accordance with the requirements of 40 CFR §60.13, 40 CFR Part 60, Appendix B, Performance Specification 2 and 6, for SO_2, and 40 CFR Part 60, Appendix F, quality assurance procedures;

(3) Continuous monitoring data collected in accordance with requirements in this subsection must undergo an appropriate quality assurance and quality control process and be validated for at least 95% of the time that the monitored emission point has emissions; an owner or operator must utilize an appropriate data substitution process based on the most accurate methodology available, which is at least equivalent to engineering judgment, to obtain all missing or invalidated monitoring data for the remaining period the monitored emission point has emissions.

(4) Minor modifications to monitoring methods may be approved by the executive director. Monitoring methods other than those specified in this section may be used if approved by the executive director and validated by 40 CFR Part 63, Appendix A, Test Method 301. For the purposes of this subsection, substitute "executive director" in each place that Test Method 301 references "administrator." These validation procedures may be waived by the executive director or a different protocol may be granted for site-specific applications. Minor modifications that may be approved under this subsection include increases in the frequency of monitoring provided appropriate quality assurance control, accuracy specifications, and data validation requirements are specified and no less stringent than monitoring requirements for a comparable EPN in this subchapter.

IACX understands the above monitoring requirements and will select one of the calculation options. However, IACX proposes to conduct periodic (weekly) sampling instead of continuous monitoring.

(b) Testing requirements.

(1) The owner of operator shall perform initial testing for monitoring devices required by subsection (a) of this section if documentation is not available to demonstrate initial tests have been conducted, as well as all subsequent testing, in accordance with the manufacturer's specifications to ensure that the required monitors are calibrated and function properly by the compliance date in §112.218 of this title (relating to Compliance Schedules).

(2) The owner or operator shall conduct initial performance testing by the compliance date in §112.218 of this title. During performance testing, the owner or operator shall operate the source at the maximum rated capacity, or as near thereto as practicable. The owner or operator shall conduct additional performance tests on the incinerator at least every five years after the compliance date to ensure the accuracy of the monitors for the gas stream sent to the incinerator or flare.

(3) The owner or operator shall conduct additional performance testing, if requested by the executive director, in compliance with 40 CFR §60.104a to demonstrate compliance with applicable emission limits or standards. The notification requirements of 40 CFR §60.8(d) apply to each initial performance test and to each subsequent performance test required by the executive director.

(4) All performance tests must be conducted using test methods allowed in §112.213(c).

IACX understands the above requirements and will conduct the required performance test.

(c) Approved test methods.

(1) Tests required under paragraph (b) of this section must be conducted using the test methods in 40 CFR Part 60, Appendices A-1 through A-8 and Appendix B or other methods as specified in this section, except as provided in §60.8(b).

(2) Sulfur dioxide in exhaust gases from the incinerator during testing must be determined using United States Environmental Protection Agency (EPA) Test Method 6 or 6C (40 CFR, Part 60, Appendix A).

(3) Alternate test methods as approved by the executive director and the EPA may be used.

The required performance test will follow the above test methods.

1.1.5 §122.216 Recordkeeping Requirements

The owner or operator shall maintain records in written or electronic format for a minimum of five years of the continuous monitoring of the sulfur content and flow rate of gases routed to either the flare or the incinerator as well as which control device was in use and of all monitoring data and emission calculations required under §112.213 of this title (relating to Monitoring Requirements). The owner or operator shall maintain records for a minimum of five years of all testing done for monitors and copies of each performance test conducted. The owner or operator shall maintain documentation for a minimum of five years of any period that emission limits or standards were exceeded and copies of required exceedance reports submitted to the appropriate Texas Commission on Environmental Quality Regional Office.

IACX understands the above requirements and will maintain the required records.

1.1.6 §122.217 Reporting Requirements

(a) For a source that is subject to an emissions limit in §112.212 of this title (relating to Control Requirements) and that exceeds an applicable emission limit or fails to meet a required stack parameter, the owner or shall submit to the Texas Commission on Environmental Quality (TCEQ) Regional Office for the area where the plant is located a report by March 31 of the year after an exceedance occurs documenting the excess emissions during the preceding calendar year, including at least the following:

(1) the date that each exceedance or failure to meet a required stack parameter occurred;

(2) an explanation of the exceedance or failure to meet a required stack parameter;

(3) a statement of whether the exceedance or failure to meet a required stack parameter was concurrent with a maintenance, startup, or shutdown period for, or malfunction of, an affected source or control system;

(4) a description of the action taken, if any; and

(5) a written statement, signed by the owner or operator, certifying the accuracy and completeness of the information contained in the report.

(b) The owner or operator shall submit a copy of each performance test report to the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction for the area where the plant is located within 60 days after completion of the test.

(c) After the effective date of a determination by the Environmental Protection Agency (EPA) that the Hutchinson County sulfur dioxide (SO_2) nonattainment area has failed to attain the 2010 one-hour SO_2 National Ambient Air Quality Standard or failed to meet reasonable further progress (RFP) pursuant to federal Clean Air Act §179(c), 42 United States Code §7509(c), the TCEQ will notify the owner or operator of the failure to attain and that the contingency measures in this subsection are triggered. Once notification is

received from the TCEQ, the owner or operator shall perform a full system audit (FSA) of all SO_2 sources subject to §112.210 of this title (relating to Applicability).

(1) Within 90 calendar days after the date of the notification, the owner or operator shall submit the FSA, including recommended provisional SO_2 emission control strategies as necessary, to the executive director of the TCEQ.

(2) As part of the FSA, the owner or operator shall conduct a root cause analysis of the circumstances surrounding the cause of the determination of failure to attain or failure to meet RFP, including a review and consideration of the following:

(A) for all causes of the determination of failure to attain or failure to meet RFP, at a minimum, hourly mass emissions of SO_2 from each SO_2 source subject to this division; and

(B) for a determination of failure to attain based on ambient air monitor data or modeling data, at a minimum, the meteorological conditions recorded at the monitor or other relevant meteorological data, including the frequency distribution of wind direction temporally correlated with SO_2 readings greater than 75 parts per billion at the monitor for which the EPA's determination of failure to attain was made; and any emissions event that may have occurred. The root cause analysis and associated records used to conduct the audit must consider information on the days that monitored exceedances occurred during the time period that the EPA evaluated in making the failure to attain determination.

IACX understands the above requirements and will follow applicable reporting requirements.

1.1.7 §122.218 Compliance Schedules

The owner or operator of a source subject to §112.210 of this title (relating to Applicability) shall comply with the requirements of this division no later than October 1, 2023.

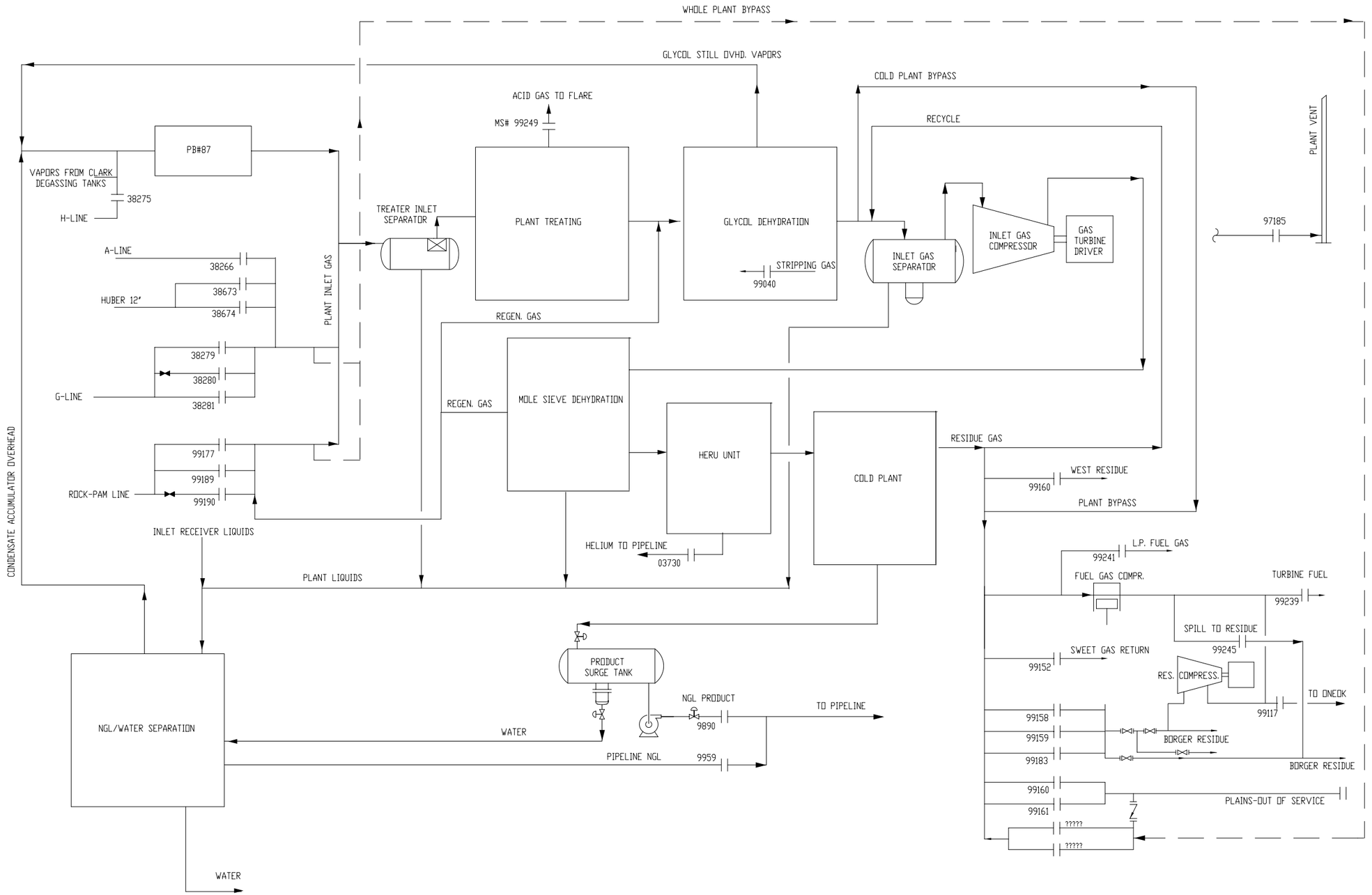
IACX submitted an amendment application for NSR permit No. 3131A to incorporate the 30 TAC 112 Subchapter F Division 2 requirements to obtain permit issuance by October 1, 2023.

1.2 APPLICATION CONTENTS

The enclosed SOP initial application for RFAB consists of the following TCEQ Forms and supplemental information:

- Section 2. Process Flow Diagram
- Section 3. Area Map
- Section 4. Plot Plan
- Section 5. Form OP-CRO1
- Section 6. Form OP-2
- Section 7. Form OP-REQ3
- Section 8. Form OP-SUMR
- Section 9. Form OP-UA1

2. PROCESS FLOW DIAGRAM



REFERENCE DRAWINGS:	NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
	1	16FEB07	INSTALL NEW BORDER	BRL			
	0		ORIGINAL ISSUE	MWT			

ROCK CREEK

ROCK CREEK PLANT

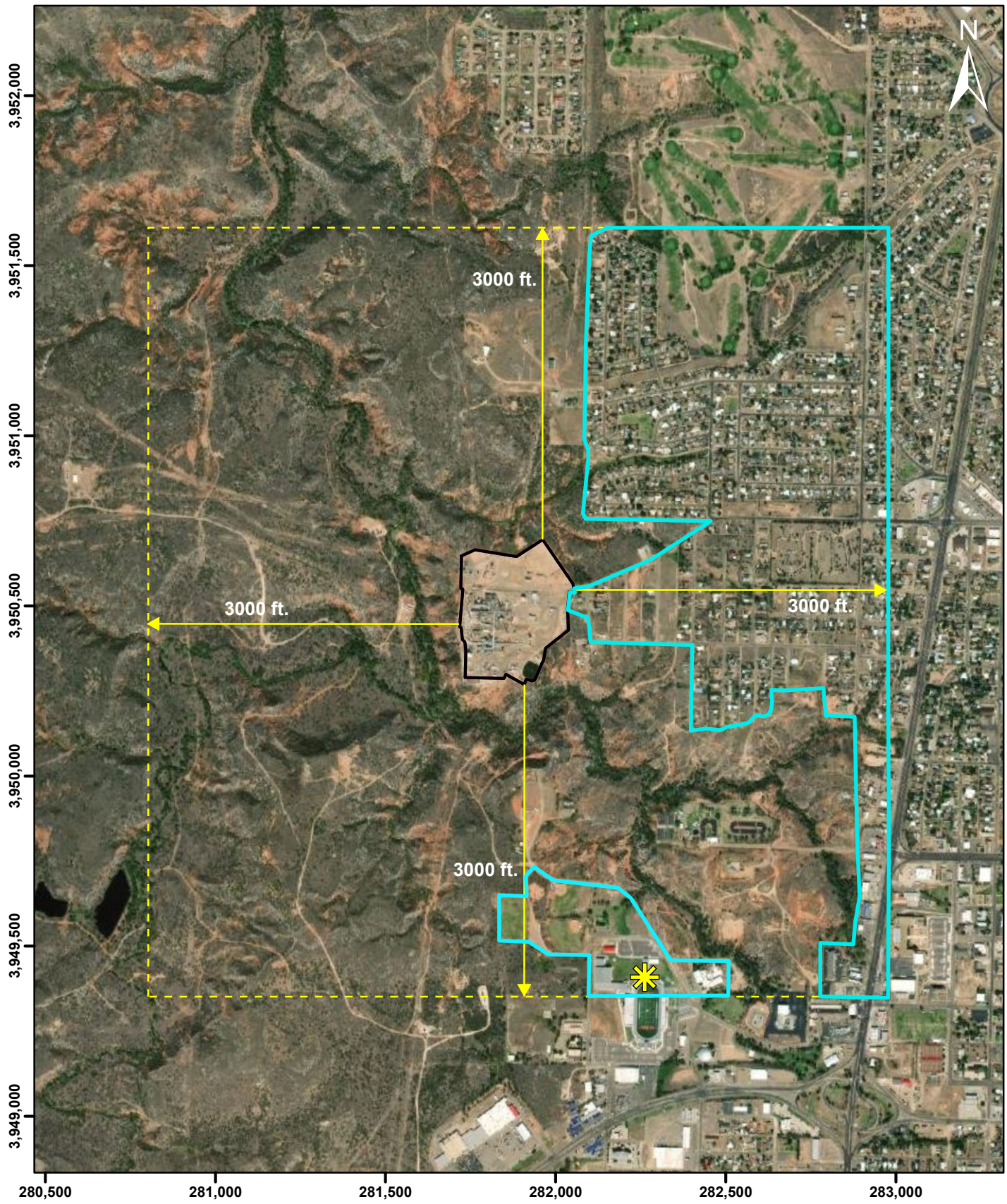
SIMPLIFIED BLOCK DIAGRAM

SCALE: NONE	PLOT SCALE: 1=1
AFE:	LOCATION: BORGER, TX
DWG. NO: SIMPLIFIED BLOCK	REV. 1

030220.1419 Bill SIMPLIFIED BLOCK.DWG

3. AREA MAP

Area Map



Legend

- Property Line
- Residential Area
- School

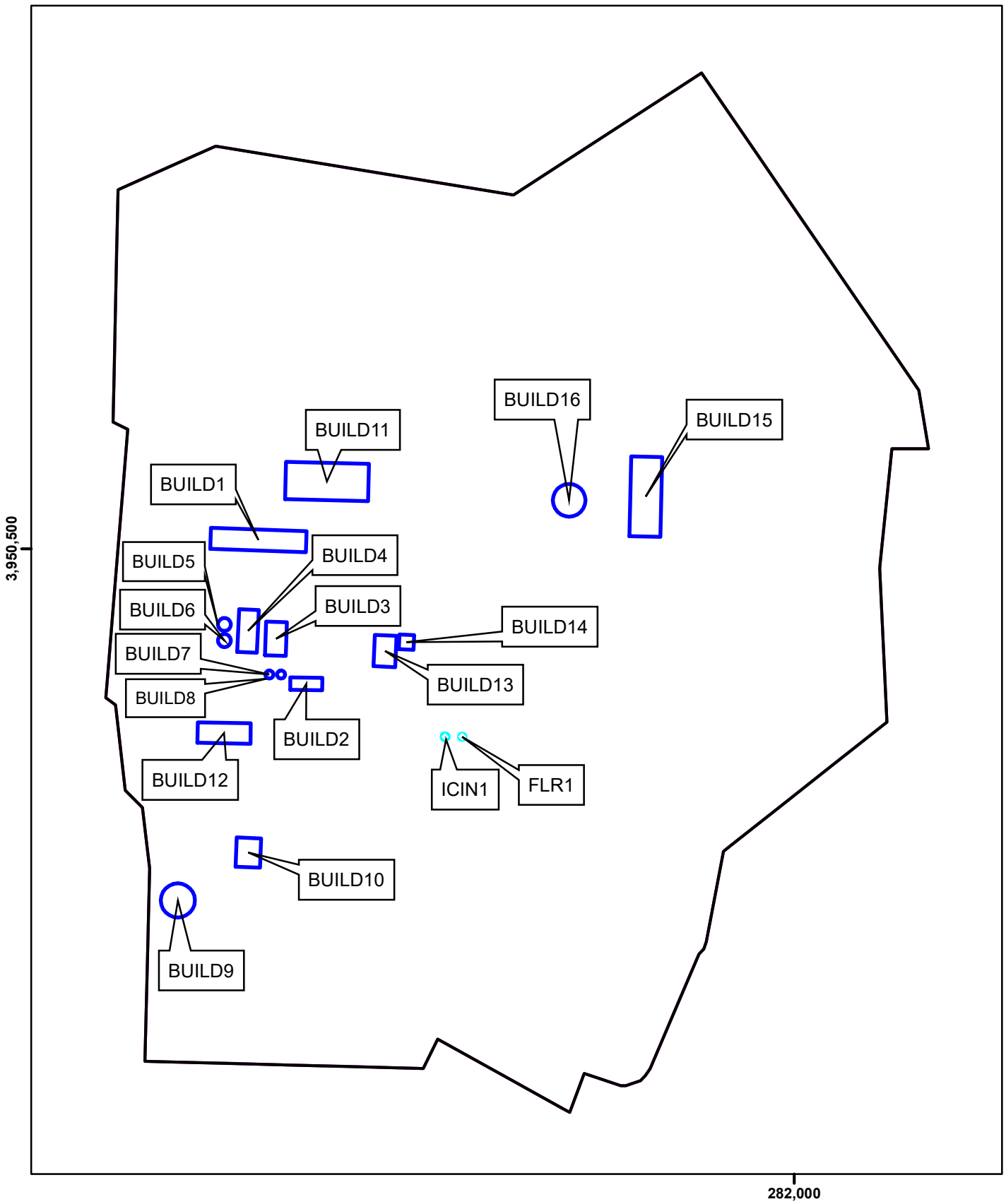
0 750 1,500 3,000 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

4. PLOT PLAN

Plot Plan



Legend

- Property Line
- Building
- Point Source

0 125 250 500 Feet

NAD 1983 UTM Zone 14

Trinity Consultants

5. TCEQ FORM OP-CRO1

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: RN100216613	
CN: CN605745843	
Account No.: HW-0020-F	
Permit No.: O-2449	
Project No.: 30874	
Area Name: Rock Creek Gas Plant	
Company Name: IACX Rock Creek LLC	
II. Certification Type *(Please mark appropriate box)*	
☒ Responsible Official Representative	☐ Duly Authorized Representative
III. Submittal Type *(Please mark appropriate box) (Only one response can be accepted per form)*	
☐ 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, Justin Wheeler certify that I am the RO

(Certifier Name printed or typed) *(RO or DAR)*

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:
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).

Time Period: From _____ to _____

(Start Date) *(End Date)*

Specific Dates: 09/26/2024 _____

(Date 1) *(Date 2)* *(Date 3)* *(Date 4)*

_____ _____

(Date 5) *(Date 6)*

Signature: _____ Signature Date: _____

Title: Director of EHS

_____

6. TCEQ FORM OP-2

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: September 26, 2024	
Permit No.: O-2249	
Regulated Entity No.: RN100216613	
Company Name: IACX Rock Creek 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	☒ SO_2	☐ PM_{10}	☒ 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: September 26, 2024
Permit No.: O-2449
Regulated Entity No.: RN100216613
Company Name: IACX Rock Creek 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	MS-C	No	FLR1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217
2	MS-C	No	INCIN1	OP-UA1	3131A	Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

7. TCEQ FORM OP-REQ3

Applicable Requirements Summary

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

Table 1a: Additions

Date: 09/26/2024	**Regulated Entity No.:** RN100216613	**Permit No.: O-2449**
Company Name: IACX Rock Creek LLC	**Area Name: Rock Creek 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	FLR1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217
2	INCIN1	OP-UA1	112-1	SO_2	30 TAC Chapter 112	§112.212 §112.213 §112.216 §112.217

8. TCEQ FORM OP-SUMR

Individual Unit 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.
09/26/2024	3131A	RN100216613

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
A	1	FLR1	OP-UA1	Acid Gas Flare		3131A	
A	2	INCIN1	OP-UA1	Acid Gas Incinerator		3131A	

9. TCEQ FORM OP-UA1

Miscellaneous and Generic Unit Attributes

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

Date:	**09/26/2024**
Permit No.:	**O-2449**
Regulated Entity No.:	**RN100216613**

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
FLR1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217

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
INCIN1	112-1	CD	10/01/2023			Emission Limits – 30 TAC 112.212 Monitoring and Testing Requirements -30 TAC 112.213 Recordkeeping Requirements -30 TAC 112.216 Reporting Requirements - 30 TAC 112.217