

**From:** Richard Suniga  
**Sent:** Monday, November 18, 2024 10:45 AM  
**To:** Miguel Gallegos  
**Subject:** Asgnd FOP 3868\_37404

Please Process.

Thank you,  
Richard Suniga  
APD/APIRT  
512.239.5325

-----Original Message-----

From: steers@tceq.texas.gov <steers@tceq.texas.gov>  
Sent: Friday, November 15, 2024 11:05 AM  
To: RFCAIR4 <RFCAIR4@tceq.texas.gov>; TVAPPS <tvapps@tceq.texas.gov>  
Subject: STEERS Title V Application Submittal (New Application)

The TV-E application has been successfully submitted by MARLAN JARZOMBK. The submittal was received at 11/15/2024 11:05 AM.

The Reference number for this submittal is 706562

The confirmation number for this submittal is 582506.

The Area ID for this submittal is 3868.

The Project ID for this submittal is 37404.

The hash code for this submittal is C2A8A15161EF2E723A7B7F3F76407CF8B8E8B9F31D5DA485B96EF4C1BE0F1FDF.

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

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

**ATTACHMENT 2  
UNIT ATTRIBUTE FORMS**

**TITLE V SOP MINOR REVISION APPLICATION**

**HOWARD COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

The following Unit Attribute Forms are included in this section:

- OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 – Storage Tank/Vessel Attributes
- OP-UA11 – Stationary Turbine Attributes

**Form OP-UA2 (Page 1)**

# Federal Operating Permit Program

**Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)**

## Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas

## Texas Commission on Environmental Quality

| Date     | Permit No. | Regulated Entity No. |
|----------|------------|----------------------|
| 11/15/24 | 03868      | 100542588            |

[illegible]







# Storage Tank/Vessel Attributes

## Form OP-UA3 (Page 3)

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/15/2024 | 03868      | 100542588            |

[illegible]







**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 7)**  
**Federal Operating Permit Program**  
**Table 3b: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)**  
**Subchapter B: Combustion Control at Major Industrial, Commercial, Institutional, and**  
**Industrial Sources in Ozone Nonattainment Areas**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/15/2024 | O3868      | 100542588            |

| Unit ID No. | SOP Index No. | 30 TAC Chapter 116 Limit (ICI) | EGF System Cap Unit | Averaging Method | NO <sub>x</sub> Reduction (ICI) | NO <sub>x</sub> Monitoring System (ICI) |
|-------------|---------------|--------------------------------|---------------------|------------------|---------------------------------|-----------------------------------------|
| COMP-1      | R7201-1       |                                |                     | 1HR              | OTHER                           | MERT                                    |
| COMP-2      | R7201-1       |                                |                     | 1HR              | OTHER                           | MERT                                    |
| COMP-3      | R7201-1       |                                |                     | 1HR              | OTHER                           | MERT                                    |
|             |               |                                |                     |                  |                                 |                                         |
|             |               |                                |                     |                  |                                 |                                         |
|             |               |                                |                     |                  |                                 |                                         |
|             |               |                                |                     |                  |                                 |                                         |
|             |               |                                |                     |                  |                                 |                                         |
|             |               |                                |                     |                  |                                 |                                         |
|             |               |                                |                     |                  |                                 |                                         |
|             |               |                                |                     |                  |                                 |                                         |















**ATTACHMENT 3**  
**APPLICABILITY DETERMINATION**

**TITLE V SOP MINOR REVISION APPLICATION**

**HOWARD COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

The following Applicability Form is included in this section:

- OP-REQ1 – Application Area-Wide Applicability Determinations and General Information

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 89)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/15/2024 | O3868      | 100542588            |

For SOP applications, answer ALL questions unless otherwise directed.

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

**XII. NSR Authorizations (continued) - (Attach additional sheets if necessary for sections XII.E-J.)**

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

| Authorization No. | Issuance Date | Authorization No. | Issuance Date | Authorization No. | Issuance Date |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 76653             | 07/19/2021    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

*A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.*

| PBR No. | Version No./Date | PBR No. | Version No./Date | PBR No. | Version No./Date |
|---------|------------------|---------|------------------|---------|------------------|
| 106.472 | 09/04/2000       |         |                  |         |                  |
| 106.511 | 09/04/2000       |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

| Permit No. | Issuance Date | Permit No. | Issuance Date | Permit No. | Issuance Date |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |



**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

| Date       |  | Permit Number | Regulated Entity Number |
|------------|--|---------------|-------------------------|
| 11/15/2024 |  | O3868         | 100542588               |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement                                                                                                   |
|-------------|---------|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| FO-TK-1     | 106.472 | 09/04/2000                           | Maintain records of actual liquid throughputs for storage tanks to ensure compliance with PBR limits under 30 TAC 106.4. |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |

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

|                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Date: 11/15/2024                                                                                                                                                                                 |
| Permit No.: 03868                                                                                                                                                                                |
| Regulated Entity No.: 100542588                                                                                                                                                                  |
| Company Name: Atmos Energy Corporation                                                                                                                                                           |
| For Submissions to EPA                                                                                                                                                                           |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span> |
| <b>I. Application Type</b>                                                                                                                                                                       |
| Indicate the type of application:                                                                                                                                                                |
| <input type="checkbox"/> Renewal                                                                                                                                                                 |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)                                                       |
| <input type="checkbox"/> Significant Revision                                                                                                                                                    |
| <input type="checkbox"/> Revision Requesting Prior Approval                                                                                                                                      |
| <input type="checkbox"/> Administrative Revision                                                                                                                                                 |
| <input type="checkbox"/> Response to Reopening                                                                                                                                                   |
| <b>II. Qualification Statement</b>                                                                                                                                                               |
| For SOP Revisions Only <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>                                                                    |
| For GOP Revisions Only <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>                                                                               |

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

|                                                                                                                                                                                                                                      |                                                     |                                          |                                           |                             |                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|------------------------------------------|-------------------------------------------|-----------------------------|----------------------------------------------------------|
| <b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>                                                                                          |                                                     |                                          |                                           |                             |                                                          |
| Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br>(Check the appropriate box(es).)                                                                                              |                                                     |                                          |                                           |                             |                                                          |
| <input checked="" type="checkbox"/> VOC                                                                                                                                                                                              | <input checked="" type="checkbox"/> NO <sub>x</sub> | <input type="checkbox"/> SO <sub>2</sub> | <input type="checkbox"/> PM <sub>10</sub> | <input type="checkbox"/> CO | <input type="checkbox"/> Pb <input type="checkbox"/> HAP |
| Other: _____                                                                                                                                                                                                                         |                                                     |                                          |                                           |                             |                                                          |
| <b>IV. Reference Only Requirements (For reference only)</b>                                                                                                                                                                          |                                                     |                                          |                                           |                             |                                                          |
| Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A                             |                                                     |                                          |                                           |                             |                                                          |
| <b>V. Delinquent Fees and Penalties</b>                                                                                                                                                                                              |                                                     |                                          |                                           |                             |                                                          |
| 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: 11/15/2024                       |
| Permit No.: 03868                      |
| Regulated Entity No.: 100542588        |
| Company Name: Atmos Energy Corporation |

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

| Revision No. | Revision Code | New Unit | Unit/Group |  | Process   | NSR Authorization  | Description of Change and Provisional Terms and Conditions |
|--------------|---------------|----------|------------|--|-----------|--------------------|------------------------------------------------------------|
|              |               |          | ID No.     |  |           |                    |                                                            |
| 1            | MS-C          | No       | COMP-2     |  | OP-UA11   | 76653              | Update NSPS KKKK and 30 TAC 117 applicability basis        |
| 2            | MS-C          | No       | SLOP-TK-1  |  | OP-UA3    | 76653              | Update 30 TAC 115 applicability                            |
| 3            | MS-C          | No       | SLOP-TK-2  |  | OP-UA3    | 76653              | Update 30 TAC 115 applicability                            |
| 4            | MS-C          | No       | SLOP-TK-3  |  | OP-UA3    | 76653              | Update 30 TAC 115 applicability                            |
| 5            | MS-C          | Yes      | FO-TK-1    |  | OP-UA3    | 106.472/09/04/2000 | Add unit to permit                                         |
| 6            | MS-A          | Yes      | FO-TK-1    |  | OP-PBRSUP | 106.472/09/04/2000 | Address on Form OP-PBRSUP                                  |
| 7            | MS-C          | No       | COMP-1     |  | OP-UA11   | 76653              | Update 30 TAC 117 applicability basis                      |
| 8            | MS-C          | No       | COMP-3     |  | OP-UA11   | 76653              | Update 30 TAC 117 applicability basis                      |
| 9            | MS-C          | No       | COMP-4     |  | OP-UA2    | 76653              | Update 30 TAC 117 applicability basis                      |
| 10           | MS-C          | No       | COMP-5     |  | OP-UA2    | 76653              | Update 30 TAC 117 applicability basis                      |

## Texas Commission on Environmental Quality

Title V Existing

3868

### Site Information (Regulated Entity)

|                                                                         |                           |
|-------------------------------------------------------------------------|---------------------------|
| What is the name of the permit area to be authorized?                   | HOWARD COMPRESSOR STATION |
| Does the site have a physical address?                                  | Yes                       |
| Physical Address                                                        |                           |
| Number and Street                                                       | 744 FM 984                |
| City                                                                    | ENNIS                     |
| State                                                                   | TX                        |
| ZIP                                                                     | 75119                     |
| County                                                                  | ELLIS                     |
| Latitude (N) (##.#####)                                                 | 32.297777                 |
| Longitude (W) (-###.#####)                                              | 96.751666                 |
| Primary SIC Code                                                        | 4922                      |
| Secondary SIC Code                                                      |                           |
| Primary NAICS Code                                                      | 486210                    |
| Secondary NAICS Code                                                    |                           |
| Regulated Entity Site Information                                       |                           |
| What is the Regulated Entity's Number (RN)?                             | RN100542588               |
| What is the name of the Regulated Entity (RE)?                          | HOWARD COMPRESSOR STATION |
| Does the RE site have a physical address?                               | No                        |
| Because there is no physical address, describe how to locate this site: | 835 FM 984                |
| City                                                                    | Athens                    |
| State                                                                   | TX                        |
| ZIP                                                                     | 75751                     |
| County                                                                  | ELLIS                     |
| Latitude (N) (##.#####)                                                 | 32.2991                   |
| Longitude (W) (-###.#####)                                              | -96.7522                  |
| Facility NAICS Code                                                     |                           |
| What is the primary business of this entity?                            |                           |

### Customer (Applicant) Information

|                                                  |                          |
|--------------------------------------------------|--------------------------|
| How is this applicant associated with this site? | Owner Operator           |
| What is the applicant's Customer Number (CN)?    | CN602730319              |
| Type of Customer                                 | Corporation              |
| Full legal name of the applicant:                |                          |
| Legal Name                                       | Atmos Energy Corporation |
| Texas SOS Filing Number                          | 54895300                 |
| Federal Tax ID                                   | 751743247                |
| State Franchise Tax ID                           | 17517432476              |
| State Sales Tax ID                               |                          |



|                                   |           |
|-----------------------------------|-----------|
| Local Tax ID                      |           |
| DUNS Number                       | 108203241 |
| Number of Employees               | 501+      |
| Independently Owned and Operated? | Yes       |

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

|                                                              |                                  |
|--------------------------------------------------------------|----------------------------------|
| Organization Name                                            | ATMOS ENERGY CORPORATION         |
| Prefix                                                       | MR                               |
| First                                                        | MARLAN                           |
| Middle                                                       |                                  |
| Last                                                         | JARZOMBEK                        |
| Suffix                                                       |                                  |
| Credentials                                                  |                                  |
| Title                                                        | VICE PRESIDENT OF OPERATIONS     |
| Enter new address or copy one from list:                     |                                  |
| Mailing Address                                              |                                  |
| Address Type                                                 | Domestic                         |
| Mailing Address (include Suite or Bldg. here, if applicable) | 5420 LBJ FWY                     |
| Routing (such as Mail Code, Dept., or Attn:)                 | SUITE 1800                       |
| City                                                         | DALLAS                           |
| State                                                        | TX                               |
| ZIP                                                          | 75240                            |
| Phone (###-###-####)                                         | 2142062718                       |
| Extension                                                    |                                  |
| Alternate Phone (###-###-####)                               |                                  |
| Fax (###-###-####)                                           | 2142062132                       |
| E-mail                                                       | marlan.jarzombek@atmosenergy.com |

## Technical Contact

Person TCEQ should contact for questions about this application:

|                                                              |                                    |
|--------------------------------------------------------------|------------------------------------|
| Select existing TC contact or enter a new contact.           | CHRIS MARLAIS(ATMOS ENERGY CO... ) |
| Organization Name                                            | ATMOS ENERGY CORPORATION           |
| Prefix                                                       | MR                                 |
| First                                                        | CHRIS                              |
| Middle                                                       |                                    |
| Last                                                         | MARLAIS                            |
| Suffix                                                       |                                    |
| Credentials                                                  |                                    |
| Title                                                        | SR ENVIRONMENTAL SPECIALIST        |
| Enter new address or copy one from list:                     |                                    |
| Mailing Address                                              |                                    |
| Address Type                                                 | Domestic                           |
| Mailing Address (include Suite or Bldg. here, if applicable) | 5420 LBJ FWY                       |

|                                              |                               |
|----------------------------------------------|-------------------------------|
| Routing (such as Mail Code, Dept., or Attn:) | STE 1752                      |
| City                                         | DALLAS                        |
| State                                        | TX                            |
| ZIP                                          | 75240                         |
| Phone (###-###-####)                         | 4698419076                    |
| Extension                                    |                               |
| Alternate Phone (###-###-####)               |                               |
| Fax (###-###-####)                           |                               |
| E-mail                                       | chris.marlais@atmosenergy.com |

## Title V General Information - Existing

|                                                                                                                           |                      |
|---------------------------------------------------------------------------------------------------------------------------|----------------------|
| 1) Permit Type:                                                                                                           | SOP                  |
| 2) Permit Latitude Coordinate:                                                                                            | 32 Deg 17 Min 52 Sec |
| 3) Permit Longitude Coordinate:                                                                                           | 96 Deg 45 Min 6 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 | <a href=/ePermitsExternal/faces/file?fileId=226210>OP_2_3_Attachment OP-2.pdf</a> |
| Hash      | 20495922CBF5696A3863B0642624643C7F7C1DB423C9CD5281BCB18A1141D847                  |
| MIME-Type | application/pdf                                                                   |

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

[File Properties]

|           |                                                                                         |
|-----------|-----------------------------------------------------------------------------------------|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=226211>OP_REQ1_3_Attachment OP-REQ1.pdf</a> |
| Hash      | 67D2C3A03124F9105BDD6B5C6A2D528F05D460BBA3E9AE9CC7C1717C36F003C6                        |
| MIME-Type | application/pdf                                                                         |

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

|           |                                                                                             |
|-----------|---------------------------------------------------------------------------------------------|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=226215>OP_PBRSUP_3_Attachment OP-PBRSUP.pdf</a> |
| Hash      | 3E19DCD0463A3F56AA69872D526869791A0057C3DF7B1D0A90410AD2D9C5776A                            |
| MIME-Type | application/pdf                                                                             |

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

|           |                                                                                         |
|-----------|-----------------------------------------------------------------------------------------|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=226212>OP_SUMR_3_Attachment OP-SUMR.pdf</a> |
| Hash      | A606C1853211E920CA92CAF54477386FFD7B6671F09D2518862127B4B0F33BA7                        |
| MIME-Type | application/pdf                                                                         |

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

|           |                                                                               |
|-----------|-------------------------------------------------------------------------------|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=226213>3_Attachment OP-UA.pdf</a> |
| Hash      | 01950D9B0544E9710C972A3FC91A69039AD4031C3AE46A43775CB7A6CB3D236A              |
| 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 | <a href=/ePermitsExternal/faces/file?fileId=226214>2_Howard SOP Rev_111424.pdf</a> |
| Hash      | AD8099C95B8BCC89C6847E2B2C02F8D17A082385F5392983913787285518CF54                   |
| 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 Marlan J Jarzombek, the owner of the STEERS account ER095731.
2. I have the authority to sign this data on behalf of the applicant named above.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a state and/or federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally signing Title V Existing 3868.
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: Marlan J Jarzombek OWNER OPERATOR

|                                      |                                                                  |
|--------------------------------------|------------------------------------------------------------------|
| Account Number:                      | ER095731                                                         |
| Signature IP Address:                | 97.105.226.2                                                     |
| Signature Date:                      | 2024-11-15                                                       |
| Signature Hash:                      | 0650934B27A7712C10D2CF4947217D66FCA3976759EEE60632F4FE8C4A23B992 |
| Form Hash Code at time of Signature: | C2A8A15161EF2E723A7B7F3F76407CF8B8E8B9F31D5DA485B96EF4C1BE0F1FDF |

### Submission

|                      |                                                              |
|----------------------|--------------------------------------------------------------|
| Reference Number:    | The application reference number is 706562                   |
| Submitted by:        | The application was submitted by ER095731/Marlan J Jarzombek |
| Submitted Timestamp: | The application was submitted on 2024-11-15 at 11:05:13 CST  |
| Submitted From:      | The application was submitted from IP address 97.105.226.2   |
| Confirmation Number: | The confirmation number is 582506                            |
| Steers Version:      | The STEERS version is 6.83                                   |
| Permit Number:       | The permit number is 3868                                    |

### Additional Information

Application Creator: This account was created by Chris J Marlais



Atmos Energy Corporation  
5430 LBJ Freeway  
Dallas, Texas 75240

November 15, 2024

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

**via STEERS**

**Subject: Title V SOP O3868 Minor Revision Application  
Atmos Energy Corporation (CN602730319)  
Howard Compressor Station (RN100542588)  
Ennis, Ellis County, Texas**

To Whom it May Concern:

Atmos Energy Corporation (Atmos) is submitting the enclosed Title V Site Operating Permit (SOP) Minor Revision application to the Texas Commission on Environmental Quality (TCEQ) for Atmos's Howard Compressor Station (Station) near Ennis, Texas in Ellis County.

With this revision application, Atmos is updating the Title 30 of the Texas Administrative Code (30 TAC) Chapter 115 applicability for the slop oil tanks (Unit IDs SLOP-TK-1, SLOP-TK-2, and SLOP-TK-3) to reflect the new requirements under Division 7, revising the Title 40 of the Code of Federal Regulations (40 CFR) Part 60, Subpart KKKK applicability basis for the natural gas-fired Solar Centaur turbine (Unit ID COMP-2) to reflect that the turbine is reconstructed rather than new, revising the 30 TAC Chapter 117 applicability basis for the natural gas-fired Solar Centaur turbines and natural gas-fired Caterpillar compressor engines (Unit IDs COMP-1 – COMP-5) to add an alternative fuel flow monitoring option as well as adding the Permit by Rule authorization for an off-permit source diesel fuel storage tank (Unit ID FO-TK-1).

Please note, the revision for the natural gas-fired Solar Centaur turbines and natural gas-fired Caterpillar compressor engines (Unit IDs COMP-1 – COMP-5) for applicable 30 TAC Chapter 117 fuel flow monitoring is to allow for the use of a totalizing fuel flow meter per 30 TAC §117.440(a) or a continuous monitoring system that continuously monitors horsepower and hours of operation per 30 TAC §117.440(a)(2)(D). This would allow the Station to comply by monitoring the horsepower and hours of operation if the totalizing fuel flow meter is down and vice versa to ensure no lapse in compliance. Since the unit attribute forms only allow for one of these options to be selected, we have completed two copies of OP-UA2 Table 1c and two copies of OP-UA11 Table 3c to identify both methods for complying with the fuel flow monitoring requirement.

Atmos appreciates in advance the TCEQ's review and approval of this SOP Minor Revision application. If you have any questions regarding the information presented in this letter and attachments, please do not hesitate to contact me at (469) 841-9076 or via email at [chris.marlais@atmosenergy.com](mailto:chris.marlais@atmosenergy.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Marlais". The signature is fluid and cursive, with the first name "Chris" and last name "Marlais" clearly distinguishable.

Chris Marlais  
Sr. Environmental Specialist

cc: Ms. Kimberli Fowler, TCEQ Region 4 - Dallas/Fort Worth  
Ms. Patricia Hustava, Apex TITAN, Inc.  
EPA Region 6 (via email) at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov)

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**HOWARD COMPRESSOR STATION**  
**ATMOS ENERGY CORPORATION**

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**Attachment 2: Unit Attribute Forms**

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**ATTACHMENT 1  
ADMINISTRATIVE FORMS**

**TITLE V SOP MINOR REVISION APPLICATION**

**HOWARD COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

The following Administrative Forms are included in this section:

- OP-2 Application for Permit Revision/Renewal
- OP-SUMR Individual Unit Summary for Revisions
- OP-CRO1 Certification by Responsible Official
- OP-PBRSUP Permit By Rule Supplemental Table



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

|                                                                                                                                            |                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Date: 11/15/2024                                                                                                                           |                                                                     |
| Permit No.: 03868                                                                                                                          |                                                                     |
| Regulated Entity No.: 100542588                                                                                                            |                                                                     |
| Company Name: Atmos Energy Corporation                                                                                                     |                                                                     |
| For Submissions to EPA                                                                                                                     |                                                                     |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA?                                                  | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| <b>I. Application Type</b>                                                                                                                 |                                                                     |
| Indicate the type of application:                                                                                                          |                                                                     |
| <input type="checkbox"/> Renewal                                                                                                           |                                                                     |
| <input checked="" type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.) |                                                                     |
| <input type="checkbox"/> Significant Revision                                                                                              |                                                                     |
| <input type="checkbox"/> Revision Requesting Prior Approval                                                                                |                                                                     |
| <input type="checkbox"/> Administrative Revision                                                                                           |                                                                     |
| <input type="checkbox"/> Response to Reopening                                                                                             |                                                                     |
| <b>II. Qualification Statement</b>                                                                                                         |                                                                     |
| For SOP Revisions Only                                                                                                                     | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only                                                                                                                     | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

|                                                                                                                                                                                                                                      |                                                     |                                          |                                           |                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|------------------------------------------|-------------------------------------------|--------------------------------------------------------------------------------------|
| <b>III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)</b>                                                                                          |                                                     |                                          |                                           |                                                                                      |
| Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br>(Check the appropriate box(es).)                                                                                              |                                                     |                                          |                                           |                                                                                      |
| <input checked="" type="checkbox"/> VOC                                                                                                                                                                                              | <input checked="" type="checkbox"/> NO <sub>x</sub> | <input type="checkbox"/> SO <sub>2</sub> | <input type="checkbox"/> PM <sub>10</sub> | <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> HAP |
| Other: _____                                                                                                                                                                                                                         |                                                     |                                          |                                           |                                                                                      |
| <b>IV. Reference Only Requirements (For reference only)</b>                                                                                                                                                                          |                                                     |                                          |                                           |                                                                                      |
| Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A                             |                                                     |                                          |                                           |                                                                                      |
| <b>V. Delinquent Fees and Penalties</b>                                                                                                                                                                                              |                                                     |                                          |                                           |                                                                                      |
| 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: 11/15/2024                       |
| Permit No.: 03868                      |
| Regulated Entity No.: 100542588        |
| Company Name: Atmos Energy Corporation |

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

| Revision No. | Revision Code | New Unit | Unit/Group |  | Process   | NSR Authorization  | Description of Change and Provisional Terms and Conditions |
|--------------|---------------|----------|------------|--|-----------|--------------------|------------------------------------------------------------|
|              |               |          | ID No.     |  |           |                    |                                                            |
| 1            | MS-C          | No       | COMP-2     |  | OP-UA11   | 76653              | Update NSPS KKKK and 30 TAC 117 applicability basis        |
| 2            | MS-C          | No       | SLOP-TK-1  |  | OP-UA3    | 76653              | Update 30 TAC 115 applicability                            |
| 3            | MS-C          | No       | SLOP-TK-2  |  | OP-UA3    | 76653              | Update 30 TAC 115 applicability                            |
| 4            | MS-C          | No       | SLOP-TK-3  |  | OP-UA3    | 76653              | Update 30 TAC 115 applicability                            |
| 5            | MS-C          | Yes      | FO-TK-1    |  | OP-UA3    | 106.472/09/04/2000 | Add unit to permit                                         |
| 6            | MS-A          | Yes      | FO-TK-1    |  | OP-PBRSUP | 106.472/09/04/2000 | Address on Form OP-PBRSUP                                  |
| 7            | MS-C          | No       | COMP-1     |  | OP-UA11   | 76653              | Update 30 TAC 117 applicability basis                      |
| 8            | MS-C          | No       | COMP-3     |  | OP-UA11   | 76653              | Update 30 TAC 117 applicability basis                      |
| 9            | MS-C          | No       | COMP-4     |  | OP-UA2    | 76653              | Update 30 TAC 117 applicability basis                      |
| 10           | MS-C          | No       | COMP-5     |  | OP-UA2    | 76653              | Update 30 TAC 117 applicability basis                      |



**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.

|                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>I. Identifying Information</b>                                                                                                      |
| RN: 100542588                                                                                                                          |
| CN: 602730319                                                                                                                          |
| Account No.: ED0238T                                                                                                                   |
| Permit No.: O3868                                                                                                                      |
| Project No.: TBA                                                                                                                       |
| Area Name: Howard Compressor Station                                                                                                   |
| Company Name: Atmos Energy Corporation                                                                                                 |
| <b>II. Certification Type</b> <i>(Please mark appropriate box)</i>                                                                     |
| <input checked="" type="checkbox"/> Responsible Official Representative <input type="checkbox"/> Duly Authorized Representative        |
| <b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>                           |
| <input type="checkbox"/> SOP/TOP Initial Permit Application <input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening |
| <input type="checkbox"/> GOP Initial Permit Application <input type="checkbox"/> Update to Permit Application                          |
| <input type="checkbox"/> Other:                                                                                                        |

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

**IV. Certification of Truth**

**This certification does not extend to information which is designated by TCEQ as information for reference only.**

I, Marlan Jarzombek certify that I am the Responsible Official (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: 11/15/2024  
(Date 1) (Date 2) (Date 3) (Date 4)

(Date 5) (Date 6)

Signature: Marlan Jarzombek Signature Date: 11/15/24

Title: Vice President of Operations



**Permit By Rule Supplemental Table (Page 4)**  
**Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area**  
**Texas Commission on Environmental Quality**

| Date       |  | Permit Number | Regulated Entity Number |
|------------|--|---------------|-------------------------|
| 11/15/2024 |  | O3868         | 100542588               |

| Unit ID No. | PBR No. | Version No./Date Or Registration No. | Monitoring Requirement                                                                                                   |
|-------------|---------|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| FO-TK-1     | 106.472 | 09/04/2000                           | Maintain records of actual liquid throughputs for storage tanks to ensure compliance with PBR limits under 30 TAC 106.4. |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |
|             |         |                                      |                                                                                                                          |



**ATTACHMENT 2  
UNIT ATTRIBUTE FORMS**

**TITLE V SOP MINOR REVISION APPLICATION**

**HOWARD COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

The following Unit Attribute Forms are included in this section:

- OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes
- OP-UA3 – Storage Tank/Vessel Attributes
- OP-UA11 – Stationary Turbine Attributes

**Form OP-UA2 (Page 1)**

# Federal Operating Permit Program

**Table 1a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)**

## Subchapter B: Combustion Control at Major Industrial, Commercial, and Institutional Sources in Ozone Nonattainment Areas

## Texas Commission on Environmental Quality

| Date     | Permit No. | Regulated Entity No. |
|----------|------------|----------------------|
| 11/15/24 | 03868      | 100542588            |

[illegible]







# Storage Tank/Vessel Attributes

## Form OP-UA3 (Page 3)

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/15/2024 | 03868      | 100542588            |

[illegible]











**Stationary Turbine Attributes  
Form OP-UA11 (Page 8)  
Federal Operating Permit Program  
Table 3c: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)  
Subchapter B: Combustion Control at Major Industrial, Commercial, Institutional, and  
Industrial Sources in Ozone Nonattainment Areas  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/15/2024 | 03868      | 100542588            |

[illegible]







**ATTACHMENT 3**  
**APPLICABILITY DETERMINATION**

**TITLE V SOP MINOR REVISION APPLICATION**

**HOWARD COMPRESSOR STATION**

**ATMOS ENERGY CORPORATION**

The following Applicability Form is included in this section:

- OP-REQ1 – Application Area-Wide Applicability Determinations and General Information

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 89)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 11/15/2024 | O3868      | 100542588            |

For SOP applications, answer ALL questions unless otherwise directed.

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

**XII. NSR Authorizations (continued) - (Attach additional sheets if necessary for sections XII.E-J.)**

- ◆ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

| Authorization No. | Issuance Date | Authorization No. | Issuance Date | Authorization No. | Issuance Date |
|-------------------|---------------|-------------------|---------------|-------------------|---------------|
| 76653             | 07/19/2021    |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |
|                   |               |                   |               |                   |               |

- ◆ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**

*A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.*

| PBR No. | Version No./Date | PBR No. | Version No./Date | PBR No. | Version No./Date |
|---------|------------------|---------|------------------|---------|------------------|
| 106.472 | 09/04/2000       |         |                  |         |                  |
| 106.511 | 09/04/2000       |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |
|         |                  |         |                  |         |                  |

- ◆ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits with an Air Addendum**

| Permit No. | Issuance Date | Permit No. | Issuance Date | Permit No. | Issuance Date |
|------------|---------------|------------|---------------|------------|---------------|
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |
|            |               |            |               |            |               |