

## 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?	Update
4.1. Select the permit/project number for which this update should be applied.	3868-37404
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

## Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=277210>OP_REQ1_Atmos Energy_Howard CS_OP-REQ1_p89.pdf</a>
Hash	9BD71AA3B876CB2DF3C40C4BBE1A0BEB14AE4A4DB9C5509DDECE42DBF482987F
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=277184>OP_PBRSUP_Atmos Energy_Howard CS_OP-PBRSUP.pdf</a>
Hash	D4BEBE60D94C86228925DD6B3B7FC4690B061C1E67E02A8A6619EBCAA74AA01D
MIME-Type	application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

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

## Certification

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

1. I am 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:	2025-08-21
Signature Hash:	0650934B27A7712C10D2CF4947217D66FCA3976759EEE60632F4FE8C4A23B992
Form Hash Code at time of Signature:	0CEE5FB03644CE678EB2759A4444EC78699695D14FE98943CF8C3DF9D32360F

## Submission

Reference Number:	The application reference number is 810940
Submitted by:	The application was submitted by ER095731/Marlan J Jarzombek
Submitted Timestamp:	The application was submitted on 2025-08-21 at 12:08:33 CDT

Submitted From:

The application was submitted from IP address 97.105.226.2

Confirmation Number:

The confirmation number is 672787

Steers Version:

The STEERS version is 6.92

Permit Number:

The permit number is 3868

## Additional Information

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Application Creator: This account was created by Chris J Marlais

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

Date	Permit Number	Regulated Entity Number
08/21/2025	O3868	100542588

Unit ID No.	Registration No.	PBR No.	Registration Date
None			

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
08/21/2025	O3868	100542588

Unit ID No.	PBR No.	Version No./Date
GEN-1A	106.511	09/04/2000
GEN-2A	106.511	09/04/2000
GEN-3	106.511	09/04/2000

**Permit By Rule Supplemental Table (Page 3)**  
**Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
08/21/2025	O3868	100542588

PBR No.	Version No./Date
None	



**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
08/21/2025	O3868	100542588

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
GEN-1A	106.511	09/04/2000	Maintain records of engine operation to demonstrate compliance with annual operating limit under 106.511
GEN-2A	106.511	09/04/2000	Maintain records of engine operation to demonstrate compliance with annual operating limit under 106.511
GEN-3	106.511	09/04/2000	Maintain records of engine operation to demonstrate compliance with annual operating limit under 106.511

**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.
08/21/2025	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
<del>76653</del>	<del>07/19/2021</del>				
179910	07/25/2025				

- ◆ **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
<del>106.472</del>	<del>09/04/2000</del>				
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

# RE: [EXT] FW: Working Draft Permit -- FOP O3868/Project 37404, Atmos Energy Corporation/Howard Compressor Station



Marlais, Chris <Chris.Marlais@atmosenergy.com>

To  Emily Knodell

Cc  Engwall, Stephanie;  Rebecca Beatty;  Nick Van Haasen;  Burdorf, Randy

Thanks Emily. Form OP-PBRUP and Form OP-REQ1 have been updated and submitted via STEERS.

Chris Marlais  
Sr. Environmental Specialist  
Atmos Energy  
469-841-9076  
[chris.marlais@atmosenergy.com](mailto:chris.marlais@atmosenergy.com)

RE: [EXT] FW: Working Draft Permit -- FOP O3868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

MC

Marlais, Chris <Chris.Marlais@atmosenergy.com>  
To 

Emily Knodell

  
Cc 

Engwall, Stephanie; Rebecca Beatty; Nick Van Haasen; Burdorf, Randy

↩ Reply

↩️ Reply All

➡ Forward

⋮

Thu 8/21/2025 12:36 PM

**CAUTION: Don't be quick to click. This e-mail originated from outside of Atmos Energy. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good afternoon all,

During management review, the following items were found. Please resolve items below and certify via STEERS by **08/21/2025**.

1.) **Form OP-PBRSUP:**

- In the application, Tables B & D were submitted, but Tables A & C are also needed. Please re-submit the OP-PBRSUP in full, including tables A, B, C, and D as a “set” with matching dates on each table. (No table should be blank, but “none” or “NA” can be used on a table as appropriate, this allows the public to know a table was not inadvertently left out and that the site is not using any insignificant PBRs).

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

This date must match on each Table.

Date	Permit Number	Regulated Entity Number
05/24/2024	O.1070	RN101753670

Unit ID No.	Registration No.	PBR No.	Registration Date
-------------	------------------	---------	-------------------

- In the application, the OP-PBRSUP contains only one unit- Unit ID GEN-2A. However, within the SOP NSR Authorization References by Emissions Unit Table (SOP Page 43), it has three units - GEN-1A, GEN2A, and GEN-3 authorized under PBR 106.511/09/04/2000. These 3 units should also be listed in OP-PBRSUP.

**New Source Review Authorization References by Emissions Unit**

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
COMP-1	CENTAUR 40-4700 TURBINE	179910
COMP-2A	CENTAUR 40-4700 TURBINE	179910
COMP-3	TAURUS 60-7800S TURBINE	179910
COMP-4	UNIT #4 CAT G3612 ENGINE	179910
COMP-5	UNIT #5 CAT G3612 ENGINE	179910
GEN-1A	KOHLER PSI 125REZGC	106.511/09/04/2000
GEN-2A	CATERPILLAR DG350 GENERATOR	106.511/09/04/2000
GEN-3	KOHLER NG EMERGENCY GENERATOR	106.511/09/04/2000
LD-1	SLOP OIL LOADING 1	179910
LD-2	SLOP OIL LOADING 2	179910
SLOP-TK-1	SLOP OIL TANK 1	179910
SLOP-TK-2	SLOP OIL TANK 2	179910
SLOP-TK-3	SLOP OIL TANK 3	179910

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

2.) **Form OP-REQ1 (Page 89):** Standard Permit 179910 has a newer date, revision issued 07/25/2025. Would you like to incorporate it into the permit? If so, please send an updated OP-REQ1 (Page 89) with the more recent date.

Let me know if you have any questions. Thank you!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107

How are we doing? Fill out our online customer satisfaction survey at [http://secure-web.cisco.com/1OnRUyY8CR4mgRrpzT4NPkAO4bOQqdh8ZuQEPj9h5o7ux5GOmp\\_eT1y\\_aSiSn1WMD3CyfPOeV59FoEYTpAVnmZbJjNRayCbgw1hhquS6nM03Lqv0BZuRKrHWk4zpal6Wa4cXG9F6skW7te\\_LfVks0HNKYbnmVKJvxUImX6XRa0NLTJl8lCkCR00Uitrq7CPyndD1pQbDxCWm8RoW4GCKDRyqF1f4mGhJl2CxtWaHDjops-iHKlpBQKITWa-Wqf3Jw/http%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey](http://secure-web.cisco.com/1OnRUyY8CR4mgRrpzT4NPkAO4bOQqdh8ZuQEPj9h5o7ux5GOmp_eT1y_aSiSn1WMD3CyfPOeV59FoEYTpAVnmZbJjNRayCbgw1hhquS6nM03Lqv0BZuRKrHWk4zpal6Wa4cXG9F6skW7te_LfVks0HNKYbnmVKJvxUImX6XRa0NLTJl8lCkCR00Uitrq7CPyndD1pQbDxCWm8RoW4GCKDRyqF1f4mGhJl2CxtWaHDjops-iHKlpBQKITWa-Wqf3Jw/http%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey)

## 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
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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:	
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State Franchise Tax ID	17517432476
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Local Tax ID	
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Number of Employees	501+
Independently Owned and Operated?	Yes

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

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First	MARLAN
Middle	
Last	JARZOMBEK
Suffix	
Credentials	
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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
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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

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4.1. Select the permit/project number for which this update should be applied.	3868-37404
5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

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Attach OP-PBR SUP (Permits by Rule Supplemental Table)	
Attach OP-SUMR (Individual Unit Summary for Revisions)	
Attach OP-MON (Monitoring Requirements)	
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MIME-Type	application/pdf
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MIME-Type	application/pdf
Attach OP-UA (Unit Attribute) Forms	
If applicable, attach OP-AR1 (Acid Rain Permit Application)	
Attach OP-CRO2 (Change of Responsible Official Information)	
Attach OP-DEL (Delegation of Responsible Official)	
Attach Void Request Form	
Attach any other necessary information needed to complete the permit.	
[File Properties]	
File Name	<a href=/ePermitsExternal/faces/file?fileId=271409>0_Email Chain Working Draft Permit -- FOP O3868_Project 37404 Atmos.pdf</a>
Hash	0A7300D418A74BECD15BAC2F6AB05725E44B7ECE2FF8523D3F5991442B3FC4AA
MIME-Type	application/pdf
[File Properties]	
File Name	<a href=/ePermitsExternal/faces/file?fileId=271410>1_WDP V2 - O3868 Atmos Energy Corp (Minor 37404)_Atmos comments.docx</a>
Hash	9A82FB1BDDCEDA18FC1789A0A6E07254A827F03D5C8E71C8333D393A4CA009BA
MIME-Type	application/vnd.openxmlformats-officedocument.wordprocessingml.document
[File Properties]	
File Name	<a href=/ePermitsExternal/faces/file?fileId=271407>2c_PM Description CO COMP-2a printed.pdf</a>
Hash	AAFA68E48C6452C88F7DBE6C63C9A644A5D39F4ADA230FB77A3B2F22F5E261DD
MIME-Type	application/pdf
[File Properties]	
File Name	<a href=/ePermitsExternal/faces/file?fileId=271408>2d_PM Description NOx COMP-2a printed.pdf</a>
Hash	ABCD02B8FD65C22D953A1BC722A214CAC604FE9BCF778F63A2932B4FFE4B1225
MIME-Type	application/pdf

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

## Certification

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

1. I am 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:	2025-07-25
Signature Hash:	0650934B27A7712C10D2CF4947217D66FCA3976759EEE60632F4FE8C4A23B992
Form Hash Code at time of Signature:	7BD6EBD8E510A17D591B946F89B39FAD6A588E9EBA711FC3A9D4C61723A54D26

## Submission

Reference Number:	The application reference number is 794635
Submitted by:	The application was submitted by ER095731/Marlan J Jarzombek
Submitted Timestamp:	The application was submitted on 2025-07-25 at 11:20:30 CDT
Submitted From:	The application was submitted from IP address 97.105.226.2
Confirmation Number:	The confirmation number is 667106
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 3868

## Additional Information

Application Creator: This account was created by Chris J Marlais

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 117.440(j)	atmosphere from any unit carbon monoxide (CO) emissions that exceed 400 ppmv at 3.0% oxygen, dry basis.	§ 117.435(b) § 117.435(d) § 117.440(a)(2)(D) § 117.8000(b) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d)	§ 117.445(f)(8)	[G]§ 117.445(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-2A	EU	R7201-2	NO <sub>x</sub>	30 TAC Chapter 117, Subchapter B	§ 117.410(a)(5)(B) § 117.410(a) § 117.410(b)(2) [G]§ 117.410(e)(1) § 117.410(e)(2) [G]§ 117.410(e)(3) § 117.410(e)(4) § 117.430(b) § 117.440(j)	No person shall allow the discharge from stationary gas turbines rated at 1.0 MW or greater, but less than 10 MW, NO <sub>x</sub> emissions <u>in excess of 0.15 lb/MMBtu</u> .	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a)(2)(D) § 117.440(k)(1) § 117.440(k)(2) § 117.8000(b) § 117.8000(c) § 117.8000(c)(1) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d)	§ 117.445(a) § 117.445(f) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-2A	EU	60KKKK-1	NO <sub>x</sub>	40 CFR Part 60, Subpart KKKK	§ 60.4320(a)-Table 1 § 60.4320(a) § 60.4320(b) <del>§ 60.4325</del> § 60.4333(a)	New turbine firing natural gas, mechanical drive, with a heat input at peak load of 50 MMBtu/h or less must meet the nitrogen oxides emission standard of 690 ng/J of useful output (5.5 lb/MWh).	§ 60.4340(a) [G]§ 60.4400(a) § 60.4400(b) § 60.4400(b)(1) § 60.4400(b)(4) § 60.4400(b)(6)	None	§ 60.4375(b)
COMP-2A	EU	60KKKK-1	SO <sub>2</sub>	40 CFR Part 60, Subpart KKKK	§ 60.4330(a)(2) § 60.4333(a)	You must not burn in the subject stationary combustion turbine any fuel which contains total	§ 60.4365 § 60.4365(a) § 60.4415(a) § 60.4415(a)(1)	§ 60.4365(a)	None



RB

Rebecca Beatty



This citation is for units that burn both natural gas and distillate oil, or some other combination of fuels.

Reply



Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
COMP-4	EU	R7201-1	CO	30 TAC Chapter 117, Subchapter B	§ 117.410(c)(1) § 117.410(c)(1)(B) § 117.440(j)	No person shall allow the discharge into the atmosphere from any stationary internal combustion engine carbon monoxide (CO) emissions that exceed 400 ppmv at 3.0% oxygen, dry basis or alternatively, 3.0 g/hp-hr	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a) § 117.440(h) § 117.8000(b) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) [G]§ 117.8000(f) § 117.8140(a) § 117.8140(a)(1) § 117.8140(a)(2) § 117.8140(a)(2)(A) [G]§ 117.8140(a)(2)(B) § 117.8140(b)	§ 117.445(a) § 117.445(f) § 117.445(f)(1) [G]§ 117.445(f)(3) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) [G]§ 117.445(e) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-4	EU	R7201-1	NO <sub>x</sub>	30 TAC Chapter 117, Subchapter B	§ 117.410(a)(4)(B)(i) § 117.410(a) § 117.410(a)(4)(F) § 117.410(b)(2) [G]§ 117.410(e)(1) § 117.410(e)(2) [G]§ 117.410(e)(3) § 117.410(e)(4) § 117.430(b) § 117.430(b)(7) § 117.440(j)	No person shall allow the discharge from gas-fired lean-burn engines placed into service before June 1, 2007, that have not been modified, reconstructed, or relocated on or after June 1, 2007, NO <sub>x</sub> emissions in excess of 0.70 g/hp-hr.	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a) § 117.440(h) § 117.440(k)(1) § 117.440(k)(2) § 117.8000(b) § 117.8000(c) § 117.8000(c)(1) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) [G]§ 117.8000(f) § 117.8140(a) § 117.8140(a)(1)	§ 117.445(a) § 117.445(f) § 117.445(f)(1) [G]§ 117.445(f)(3) § 117.445(f)(8)	<del>§ 117.340(p)(2)(D)</del> § 117.435(f) § 117.445(b) [G]§ 117.445(c) [G]§ 117.445(e) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)



RB

Rebecca Beatty



Requirement for HGB area

Reply



Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
							[G]§ 117.8140(a)(2)(B) § 117.8140(b)		
COMP-5	EU	R7201-1	NO <sub>x</sub>	30 TAC Chapter 117, Subchapter B	§ 117.410(a)(4)(B)(i) § 117.410(a) § 117.410(a)(4)(F) § 117.410(b)(2) [G]§ 117.410(e)(1) § 117.410(e)(2) [G]§ 117.410(e)(3) § 117.410(e)(4) § 117.430(b) § 117.430(b)(7) § 117.440(j)	No person shall allow the discharge from gas-fired lean-burn engines placed into service before June 1, 2007, that have not been <u>modified</u> , reconstructed, or relocated on or after June 1, 2007, NO <sub>x</sub> emissions in <u>excess of</u> 0.70 g/hp-hr.	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a) § 117.440(h) § 117.440(k)(1) § 117.440(k)(2) § 117.8000(b) § 117.8000(c) § 117.8000(c)(1) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) [G]§ 117.8000(f) § 117.8140(a) § 117.8140(a)(1) § 117.8140(a)(2) § 117.8140(a)(2)(A) [G]§ 117.8140(a)(2)(B) § 117.8140(b)	§ 117.445(a) § 117.445(f) § 117.445(f)(1) [G]§ 117.445(f)(3) § 117.445(f)(8)	<del>§ 117.340(p)(2)(D)</del> § 117.435(f) § 117.445(b) [G]§ 117.445(c) [G]§ 117.445(e) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-5	EU	R7201-2	CO	30 TAC Chapter 117, Subchapter B	§ 117.410(c)(1) § 117.410(c)(1)(B) § 117.440(j)	No person shall allow the discharge into the atmosphere from any stationary internal combustion engine carbon monoxide (CO) emissions that exceed 400 ppmv at 3.0% oxygen, dry basis or alternatively, 3.0 g/hp-hr	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a)(2)(D) § 117.440(h) § 117.8000(b) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6)	§ 117.445(a) § 117.445(f) [G]§ 117.445(f)(3) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) [G]§ 117.445(e) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5)



RB

Rebecca Beatty

...



Requirement for HGB area

Reply

**From:** Emily Knodell  
**To:** Burdorf, Randy  
**Cc:** Engwall, Stephanie; Marlais, Chris; Rebecca Beatty; Nick Van Haasen  
**Subject:** RE: [EXT] FW: Working Draft Permit -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station  
**Date:** Thursday, July 24, 2025 8:26:35 AM  
**Attachments:** Working Draft Permit Version 3 - 03868 Atmos Energy Corporation (Minor\_37404).docx  
image001.png  
image002.png

Good morning Mr. Burdorf,

We have reviewed your request, please see my responses below in blue.

There appear to be two (2) citations listed in the Applicable Requirements Summary that do not apply to the Howard CS.

- 60.4325 under NSPS KKKK applies to units fired with both natural gas and distillate oil, or some other combination of fuels, so it's not applicable to COMP-2A (p. 18).  
*Your request to delete standard 60.4325 from the NOx requirements is acceptable and we have granted this request. It is correct that this citation is only for units that are firing multiple fuels.*
- 117.340(p)(2)(D) is a test report submittal requirement for units not using a CEMS/PEMS in the HGB nonattainment area, so it's not applicable to COMP-4 or COMP-5 (p. 21 & 24).  
*You are correct that reporting citation 117.340(p)(2)(D) does not apply to you because the site is not in the HGB nonattainment area. The presence of this citation is an error on our end that we are correcting.*


I have attached a courtesy copy of the WDP "Version 3" which reflects the requested changes. If there are no additional comments, please proceed to the item below and resolve by **07/28/2025**.

- Form OP-CRO1:** At this time, I would like to ask for the form OP-CRO1 certifying the changes made to the application. Please fill out the Time Period from **12/12/2024** to **07/24/2025**. Please send me an electronic copy and the original, signed hardcopy. Alternatively, in lieu of the OP-CRO1, you can submit this email thread and attachments as an update to the application through STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. STEERS does not accept the Outlook ".msg" file type, but it does take PDFs.

Please let me know if you have any questions.

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107

 How are we doing? Fill out our online customer satisfaction survey at [www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

**From:** Burdorf, Randy <Randy.Burdorf@atmosenergy.com>  
**Sent:** Monday, July 21, 2025 7:46 AM  
**To:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Cc:** Engwall, Stephanie <Stephanie.Engwall@atmosenergy.com>; Marlais, Chris <Chris.Marlais@atmosenergy.com>; Rebecca Beatty <rebecca.beatty@apexcos.com>; Nick Van Haasen <Nicholas.VanHaasen@apexcos.com>  
**Subject:** RE: [EXT] FW: Working Draft Permit -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

Ms. Knodell,

Attached find Atmos Energy's comments to the WDP Version 2 document.

There appear to be two (2) citations listed in the Applicable Requirements Summary that do not apply to the Howard CS.

- 60.4325 under NSPS KKKK applies to units fired with both natural gas and distillate oil, or some other combination of fuels, so it's not applicable to COMP-2A (p. 18).
- 117.340(p)(2)(D) is a test report submittal requirement for units not using a CEMS/PEMS in the HGB nonattainment area, so it's not applicable to COMP-4 or COMP-5 (p. 21 & 24).

Please contact me if you have any questions or concerns.

Thank you,

Randall (Randy) Burdorf | Manager Environmental | Atmos Energy Corporation | 972-855-3113 Office | 469-994-7678 Cell | 5430 Lyndon B Johnson Fwy, Ste. 700, Dallas, TX 75240 | [Randy.Burdorf@atmosenergy.com](mailto:Randy.Burdorf@atmosenergy.com) | [www.atmosenergy.com](http://www.atmosenergy.com)

**From:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Sent:** Tuesday, July 15, 2025 10:48 AM  
**To:** Burdorf, Randy <Randy.Burdorf@atmosenergy.com>  
**Cc:** Engwall, Stephanie <Stephanie.Engwall@atmosenergy.com>; Marlais, Chris <Chris.Marlais@atmosenergy.com>; Rebecca Beatty <rebecca.beatty@apexcos.com>; Nick Van Haasen <Nicholas.VanHaasen@apexcos.com>  
**Subject:** RE: [EXT] FW: Working Draft Permit -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

**CAUTION: Don't be quick to click. This e-mail originated from outside of Atmos Energy. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good morning all,

I have prepared a Working Draft Permit "Version 2". Please review the WDP and submit to me any comments you have by **July 22, 2025**.

Since this is a follow-up review to the previously submitted and reviewed WDP, only comments concerning changes since the last WDP may be considered by TCEQ. Any comments outside the scope of the most recent changes should be submitted as a separate project.

**Summary of Changes:**

- Added missing issuance date (February 22, 2023) to the permit face (Draft Page 1).
- Revised term 11. (C) according to the revised OP-REQ1 pages provided (Draft Page 6).
- Unit ID GEN-2A: added new generator engine in place of GEN-2 (Draft Page 13 & 27-29).
- Unit ID COMP-2A: added new turbine in place of COMP-2 (Draft Pages 11, & 17-19).
- Unit IDs SLOP-TK-1, SLOP-TK-2, SLOP-TK-3: removed Index Number R5112's UA data as indicated on Form OP-UA3 strikethrough text (Pages 4 & 5).
- Unit IDs COMP-4 & COMP-5: added missing R7201-2 citations for NOx and CO (Draft Pages 22-25).
- Unit ID COMP-2A: added Periodic Monitoring for Index No. R7201-1, pollutants CO & NOx (Draft Pages 37 & 38).
- NSR 179910: updated issuance date to 05/29/2025 (Draft Pages 42 & 43).

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107

How are we doing? Fill out our online customer satisfaction survey at [http://secure.web.disco.com/1RL5ggrfAV6R9QDBH4kaR76U8d7Qgxa2piRVVgOxrd2mn3gTHD3jFQyIQ\\_HXVksAQIZ4P4eVecmf619STEMZdKF6NY-uRoZS4WEcDoZakpccxFd0j3RYuTN6\\_LxxfEBaPvrv9Oqnt7nP2MP1ph2a9RziI4nWAWyShaZ9MKooiYEolI38IO-QzDB2Kzkuw1fw8CGr9JD3gc6i6GbrMsX3kaHL0SE8YfIOg/http%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey](http://secure.web.disco.com/1RL5ggrfAV6R9QDBH4kaR76U8d7Qgxa2piRVVgOxrd2mn3gTHD3jFQyIQ_HXVksAQIZ4P4eVecmf619STEMZdKF6NY-uRoZS4WEcDoZakpccxFd0j3RYuTN6_LxxfEBaPvrv9Oqnt7nP2MP1ph2a9RziI4nWAWyShaZ9MKooiYEolI38IO-QzDB2Kzkuw1fw8CGr9JD3gc6i6GbrMsX3kaHL0SE8YfIOg/http%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey)

**From:** Burdorf, Randy <Randy.Burdorf@atmosenergy.com>  
**Sent:** Thursday, June 19, 2025 8:51 AM  
**To:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Cc:** Engwall, Stephanie <Stephanie.Engwall@atmosenergy.com>; Marlais, Chris <Chris.Marlais@atmosenergy.com>; Rebecca Beatty <rebecca.beatty@apexcos.com>; Nick Van Haasen <Nicholas.VanHaasen@apexcos.com>  
**Subject:** RE: [EXT] FW: Working Draft Permit -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

Ms. Knodell,

Atmos is submitting our comments (in red below) to your 6/13/2025 email regarding the NOx Form OP-MON and the CO Form OP-MON for COMP-2a.

Attached find updated TCEQ Forms:

- Form OP-MON for COMP-2a Table 1c for NOx (Main Standard 117.410(a)(5)(B)),
- Form OP-MON for COMP-2a Table 1c for CO (Main Standard 117.410(c)(1)),
- Periodic Monitoring Summary for NOx Main Standard 117.410(a)(5)(B) for COMP-2a and
- Periodic Monitoring Summary for CO Main Standard 117.410(c)(1) for COMP-2a.

Atmos will submit these SOP documents via STEERS with RO Certification. Additionally, after STEERS submittal, Atmos will transmit the revised SOP documents to TCEQ Region 4 and the EPA via email.

Please feel free to contact me if you have questions or comments associated with this response.

**Texas Commission on Environmental Quality**  
**Monitoring Requirements**  
**Form OP-MON (Page 3)**  
**Federal Operating Permit Program**  
**Table 1c: CAM/PM Case-By-Case Additions**

<b>I. Identifying Information</b>		
Account No.: ED0238T	RN No.: 100542588	CN: 602730319
Permit No: O3868		Project No.: 37404
Area Name: Howard Compressor Station		
Company Name: Atmos Energy Corporation		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.: 13		
Unit/EPN/Group/Process ID No.: COMP-2a		
Applicable Form: OP-UA11		
<b>III. Applicable Regulatory Requirement</b>		
Name: 30 TAC 117, Subchapter B		
SOP/GOP Index No.: R7201-1		
Pollutant: CO		
Main Standard: 30 TAC 117.410 (c)(1)		
Monitoring Type: PM		
Unit Size: SM		
Deviation Limit: Maximum CO concentration of 400 ppm at 3% O2, dry basis		
<b>IV. Control Device Information</b>		
Control Device ID No.:N/A		
Device Type:		
<b>V. CAM Case-by-case</b>		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
<b>VI. Periodic Monitoring Case-by-case</b>		
Indicator: CO concentration		Minimum Frequency: Annually
Averaging Period: Hourly		
Periodic Monitoring Text: ASTM D6348 sampling using FTIR/NDIR, requested as an alternative to EPA RM 10		

**Texas Commission on Environmental Quality**  
**Monitoring Requirements**  
**Form OP-MON (Page 3)**  
**Federal Operating Permit Program**  
**Table 1c: CAM/PM Case-By-Case Additions**

<b>I. Identifying Information</b>		
Account No.: ED0238T	RN No.: 100542588	CN: 602730319
Permit No: 03868		Project No.: 37404
Area Name: Howard Compressor Station		
Company Name: Atmos Energy Corporation		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.: 13		
Unit/EPN/Group/Process ID No.: COMP-2a		
Applicable Form: OP-UA11		
<b>III. Applicable Regulatory Requirement</b>		
Name: 30 TAC 117, Subchapter B		
SOP/GOP Index No.: R7201-1		
Pollutant: NOx		
Main Standard: 30 TAC 117.410 (a)(5)(B)		
Monitoring Type: PM		
Unit Size: SM		
Deviation Limit: Maximum NOX concentration of 0.15 lb/MMBtu		
<b>IV. Control Device Information</b>		
Control Device ID No.:N/A		
Device Type:		
<b>V. CAM Case-by-case</b>		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
<b>VI. Periodic Monitoring Case-by-case</b>		
Indicator: NOx concentration		Minimum Frequency: Annually
Averaging Period: Hourly		
Periodic Monitoring Text: ASTM D6348 sampling using FTIR, requested as an alternative to EPA RM 7E		

### Periodic Monitoring Summary

<b>Unit/Group/Process Information</b>	
ID No.: COMP-2a	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 117, Subchapter B	SOP Index No.: R7201-1
Pollutant: CO	Main Standard: § 117.410 (c)(1)
<b>Monitoring Information</b>	
Indicator: CO concentration	
Minimum Frequency: Annual	
Averaging Period: Hourly	
Deviation Limit: Maximum CO concentration of 400 ppmv at 3% O <sub>2</sub> , dry basis	
Periodic Monitoring Text: Monitor the carbon monoxide concentration per ASTM D6348 sampling method, requested as an alternative to EPA Reference Method 10, using FTIR/NDIR analysis methods. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with the manufacturer's specifications or other written procedures. The monitoring shall be conducted at least annually. All monitoring data shall be recorded. If the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2).	



### Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: COMP-2a	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 117, Subchapter B	SOP Index No.: R7201-1
Pollutant: NOx	Main Standard: § 117.410 (a)(5)(B)
Monitoring Information	
Indicator: NOx concentration	
Minimum Frequency: Annual	
Averaging Period: Hourly	
Deviation Limit: Maximum NOx concentration of 0.15 lb/MMBtu	
<p>Periodic Monitoring Text: Monitor the nitrogen oxide concentration per ASTM D6348 sampling method, requested as an alternative to EPA Reference Method 7E, using FTIR or Chemiluminescence analysis methods. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with the manufacturer's specifications or other written procedures. The monitoring shall be conducted at least annually. All monitoring data shall be recorded. If the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2).</p>	

Thank you for your assistance in this matter.

Randall (Randy) Burdorf | Manager Environmental | Atmos Energy Corporation | 972-855-3113 Office | 469-994-7678 Cell | 5430 Lyndon B Johnson Fwy, Ste. 700, Dallas, TX 75240 | [Randy.Burdorf@atmosenergy.com](mailto:Randy.Burdorf@atmosenergy.com) | [www.atmosenergy.com](http://www.atmosenergy.com)

From: Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
Sent: Friday, June 13, 2025 3:11 PM  
To: Burdorf, Randy <[Randy.Burdorf@atmosenergy.com](mailto:Randy.Burdorf@atmosenergy.com)>  
Cc: Mariani, Chris <[Chris.Mariani@atmosenergy.com](mailto:Chris.Mariani@atmosenergy.com)>; Engwall, Stephanie <[Stephanie.Engwall@atmosenergy.com](mailto:Stephanie.Engwall@atmosenergy.com)>  
Subject: RE: [EXT] FW: Working Draft Permit -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

CAUTION: Don't be quick to click. This e-mail originated from outside of Atmos Energy. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Mr. Burdorf,

Thank you for providing comments on the draft. Please resolve the item below by **06/20/2025**.

1. **Form OP-MON:** I am currently working through the revisions you sent and noticed that there are Case-by-Case OP-MONS in the attachment. For the Periodic Monitoring Text (highlighted in the screenshot below), please give more detail to the justification on both OP-MONS for Unit ID COMP-2A, as I know this is something our CAM/PM specialist will be looking for when I send these over to him for review. Please send over both revised OP-MON pages.

The details related to the justification on both the new COMP-2a NOx Form OP-MON and the CO Form OP-MON are similar to the details associated with the justification that was provided to the TCEQ during the recent 2022-2023 SOP Renewal Application (refer to the attached July 21, 2022 email between the TCEQ and Atmos related to Form OP-MON and SOP Periodic Monitoring Summary text for the old COMP-2). With this SOP Minor Revision Application, Atmos is providing the information for the new COMP-2a that was previously submitted for the old COMP-2 in the 7/21/2022 email between the TCEQ and Atmos.

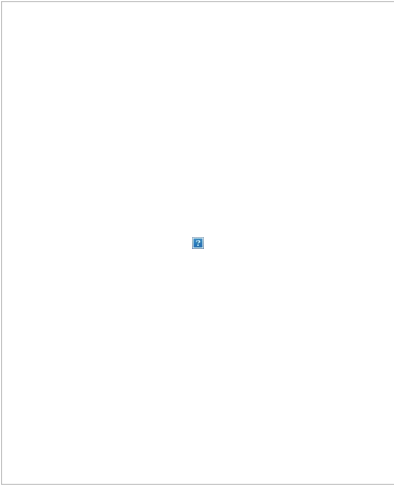
The new COMP-2a natural gas-fired turbine (like the old COMP-2 natural gas-fired turbine) does not have an add-on NOx or CO control device. The TCEQ Form OP-MON Instructions state that the Control Device ID No. section should be left blank for the NOx Form OP-MON and the CO Form OP-MON. However, to more clearly identify the fact that there is not a NOx or CO add-on control device for the new COMP-2a, the letters "N/A" have been added to the Control Device ID No. portion of the attached NOx Form OP-MON and the CO Form OP-MON for COMP-2a. Atmos has clearly identified the Periodic Monitoring Text in Section VI of the CO and NOx Form OP-MONS.

During 2022-2023 SOP Renewal Project an in-depth review of the SOP Periodic Monitoring Summary was performed. With this SOP Minor Revision submittal, Atmos is proposing the SOP Periodic Monitoring Summary for the new COMP-2a NOx and CO Periodic Monitoring Summaries (refer to attached COMP-2a NOx and CO Periodic Monitoring Summary). The old COMP-2 turbine was not equipped with a NOx or CO add-on control device and the new COMP-2A is not equipped with an add-on control device. Atmos is proposing that the NOx and CO Periodic Summaries be revised to clearly identify the Periodic Monitoring Text section in the Monitoring Information Section.

Here is our current periodic monitoring document so you can see examples of the detail we are looking for.

[https://secure-web.cisco.com/1YrCQWW-9Hs1bnWmWn0vHOMkqLXvRbtEnhoFymCGfteQoZnuDyQgVFfS9-TkAo2FeNvulMSPB-O\\_QytLPf\\_5ghVzrsb7kUW10sDd36-AuwsOobxlonZiSkKxVGZ5XYS\\_6THvK31gZduvG67QGbyW18PbXxhtPFmJ3or4eBHor5b7HRHTv64o1UNCubRgCzoEgoowgSn3Tdggdl8KJa8tdHzcbi6BsMivvCYod9ekFQxAw8\\_Gdl\\_XEUndPGvcJk8JlUspQqF-SMsm-KUYenLxoQ/https%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle\\_V%2Fperiodicmon.pdf](https://secure-web.cisco.com/1YrCQWW-9Hs1bnWmWn0vHOMkqLXvRbtEnhoFymCGfteQoZnuDyQgVFfS9-TkAo2FeNvulMSPB-O_QytLPf_5ghVzrsb7kUW10sDd36-AuwsOobxlonZiSkKxVGZ5XYS_6THvK31gZduvG67QGbyW18PbXxhtPFmJ3or4eBHor5b7HRHTv64o1UNCubRgCzoEgoowgSn3Tdggdl8KJa8tdHzcbi6BsMivvCYod9ekFQxAw8_Gdl_XEUndPGvcJk8JlUspQqF-SMsm-KUYenLxoQ/https%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle_V%2Fperiodicmon.pdf)

The periodic monitoring text should identify the data collection procedures that will be used (e.g., computerized data acquisition and handling, alarm sensor, or manual log entries based on gauge readings) and procedures that provide for obtaining data (e.g. test methods) (maximum 4000 characters consisting of alphanumeric characters).



Please let me know if you have any questions. Thank you and have a great weekend!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ -- APD -- OP Section (Title V)  
(512) 239-3107

How are we doing? Fill out our online customer satisfaction survey at [http://secure-web.cisco.com/1shCYGikFYuUGJE-SVNHt6ipnIFs01QcTAgmkTCsz3bG0R\\_Yo4EIKGCeWwCdpkamNwNeYjQYQpJouSeFjY1\\_kBglWbj6R0f6macBIIMymXfILM764TJUtqAmYLElqNsWQveEP8H13mO5BcaPdJQelgmVbuN\\_fPTbLPJaXA3wigoMAWXAO1xn2UI4Yi1omW2Kf3\\_5egLhTFgZaCX6puV1TIDEbboX1KqJbZSQw-XoKsIEURVsMPf54xYMC4Vsr737hTLcq4gtTHYPZcg/http%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey](http://secure-web.cisco.com/1shCYGikFYuUGJE-SVNHt6ipnIFs01QcTAgmkTCsz3bG0R_Yo4EIKGCeWwCdpkamNwNeYjQYQpJouSeFjY1_kBglWbj6R0f6macBIIMymXfILM764TJUtqAmYLElqNsWQveEP8H13mO5BcaPdJQelgmVbuN_fPTbLPJaXA3wigoMAWXAO1xn2UI4Yi1omW2Kf3_5egLhTFgZaCX6puV1TIDEbboX1KqJbZSQw-XoKsIEURVsMPf54xYMC4Vsr737hTLcq4gtTHYPZcg/http%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey)

## 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?	Update
4.1. Select the permit/project number for which this update should be applied.	3868-37404
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=262534>OP_2_Form OP-2.pdf</a>
Hash	82171A504C03ECF3AE63779FA83A2FD289CA0241966C6743467CBC8699AB7AB8
MIME-Type	application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=262535>OP_REQ1_Form OP-REQ1.pdf</a>
Hash	1DF91758DCFEED65C2E9291DBDC1554DC970FB603E29DFC194D85C7AADFAB290
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=262536>OP_PBRSUP_Form OP-
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PBRSUP.pdf</a>

Hash DD04A40A8BC76819694490BCA591D18D313023E0DF4247910BC085BB642F2A4B

MIME-Type application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=262537>OP\_SUMR\_Form OP-SUMR.pdf</a>

Hash DF22F345711039E5F8A741F21CFB074681ACFD34E2C449EBD340015C9220BB37

MIME-Type application/pdf

Attach OP-MON (Monitoring Requirements)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=262538>OP\_MON\_Form OP-MON.pdf</a>

Hash C2631C6AC325C80632D48B60F60B535F4C507ECBF0926F2AC3A8251EC5C7B39E

MIME-Type application/pdf

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=262541>Form OP-UA11.pdf</a>

Hash 057E1B9FEF660F537922F25AFD5AF6F50C35AAAEAE90A2B2AF3B033C6AE142E3

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=262539>Form OP-UA2.pdf</a>

Hash 3F805C63194DFA66BAD9CD1553B6068E2993C9F24CB991B4C8BEDE71C237B382

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=262540>Form OP-UA3.pdf</a>

Hash 3CCF28B4E4FAFE3E4F1EFB3ECC0A978F43548DDC0DA9753FA70BA855F492D1E2

MIME-Type application/pdf

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=262542>20250609 WDP\_O3868 Atmos Energy Corporation (Minor 37404)\_Markup+Revision.docx</a>

Hash 559461F453632C82A5BDD51D6A9EEA922C158A8C8F87751D6DED69C2EA32F89E

MIME-Type

application/vnd.openxmlformats-officedocument.wordprocessingml.document

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

## Certification

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

1. I am 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:	2025-06-09
Signature Hash:	0650934B27A7712C10D2CF4947217D66FCA3976759EEE60632F4FE8C4A23B992
Form Hash Code at time of Signature:	8465FD93299B5DF4568BADE4B454B09EC3AE412E51821DD12AAC8DA42D2B66A7

## Submission

Reference Number:	The application reference number is 792170
Submitted by:	The application was submitted by ER095731/Marlan J Jarzombek
Submitted Timestamp:	The application was submitted on 2025-06-10 at 06:51:40 CDT
Submitted From:	The application was submitted from IP address 163.116.253.64
Confirmation Number:	The confirmation number is 657912
Steers Version:	The STEERS version is 6.91
Permit Number:	The permit number is 3868

## Additional Information

Application Creator: This account was created by Chris J Marlais

# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Atmos Energy Corporation

AUTHORIZING THE OPERATION OF  
Howard Compressor Station  
Pipeline Transportation of Natural Gas

LOCATED AT  
Ellis County, Texas  
Latitude 32° 17' 52" Longitude 96° 45' 6"  
Regulated Entity Number: RN100542588

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

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

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

Due to the unsatisfactory compliance history rating, this permit shall expire four years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: 03868 Issuance Date: February 22, 2023

\_\_\_\_\_  
For the Commission

**Rebecca Beatty**  
**Formatted:** Highlight



- A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
9. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
10. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).
11. The permit holder shall comply with the following requirements for Air Quality Standard Permits:
- A. Registration requirements listed in 30 TAC § 116.611, unless otherwise provided for in an Air Quality Standard Permit
  - B. General Conditions listed in 30 TAC § 116.615, unless otherwise provided for in an Air Quality Standard Permit
  - C. Applicable requirements of ~~30 TAC § 116.620 for Installation and/or Modification of the non-rule Air Quality Standard Permit for~~ Oil and Gas Handling and Production Facilities based on the information contained in the registration application.

### Compliance Requirements

12. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
13. Permit holder shall comply with the following 30 TAC Chapter 117 requirements:
- A. The permit holder shall comply with the compliance schedules and submit written notification to the TCEQ Executive Director as required in 30 TAC Chapter 117, Subchapter H, Division 1:
    - (i) For sources in the Dallas-Fort Worth Eight-Hour Nonattainment area, 30 TAC § 117.9030
  - B. The permit holder shall comply with the Initial Control Plan unit identification requirements in 30 TAC § 117.450(a) and (a)(1)-(7).

### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
					monitors horsepower and hours of operation per 30 TAC §§ 117.140(a)(2)(D), 117.240(a)(2)(C), 117.340(a)(2)(D) or 117.440(a)(2)(D)
COMP-5	SRIC ENGINES	N/A	63ZZZZ-1	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GEN-1A	SRIC ENGINES	N/A	R7201-4	30 TAC Chapter 117, Subchapter B	No changing attributes.
GEN-1A	SRIC ENGINES	N/A	60JJJJ-1	40 CFR Part 60, Subpart JJJJ	No changing attributes.
GEN-1A	SRIC ENGINES	N/A	63ZZZZ-4	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GEN-2A	SRIC ENGINES	N/A	R7201-34	30 TAC Chapter 117, Subchapter B	No changing attributes.
GEN-2A	SRIC ENGINES	N/A	60JJJJ-1	40 CFR Part 60, Subpart JJJJ	No changing attributes.
GEN-2A	SRIC ENGINES	N/A	63ZZZZ-34	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GEN-3	SRIC ENGINES	N/A	R7201-4	30 TAC Chapter 117, Subchapter B	No changing attributes.
GEN-3	SRIC ENGINES	N/A	60JJJJ-2	40 CFR Part 60, Subpart JJJJ	No changing attributes.
GEN-3	SRIC ENGINES	N/A	63ZZZZ-4	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
LD-1	LOADING/UNLOADING OPERATIONS	N/A	R5211	30 TAC Chapter 115, Loading and Unloading of VOC	No changing attributes.



### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
LD-2	LOADING/UNLOADING OPERATIONS	N/A	R5211	30 TAC Chapter 115, Loading and Unloading of VOC	No changing attributes.
SLOP-TK-1	STORAGE TANKS/VESSELS	N/A	R5172-1	30 TAC Chapter 115, Oil and Natural Gas Service	No changing attributes.
<del>SLOP-TK-1</del>	<del>STORAGE TANKS/VESSELS</del>	<del>N/A</del>	<del>R5112</del>	<del>30 TAC Chapter 115, Storage of VOCs</del>	<del>No changing attributes.</del>
SLOP-TK-2	STORAGE TANKS/VESSELS	N/A	R5172-1	30 TAC Chapter 115, Oil and Natural Gas Service	No changing attributes.
<del>SLOP-TK-2</del>	<del>STORAGE TANKS/VESSELS</del>	<del>N/A</del>	<del>R5112</del>	<del>30 TAC Chapter 115, Storage of VOCs</del>	<del>No changing attributes.</del>
SLOP-TK-3	STORAGE TANKS/VESSELS	N/A	R5172-1	30 TAC Chapter 115, Oil and Natural Gas Service	No changing attributes.
<del>SLOP-TK-3</del>	<del>STORAGE TANKS/VESSELS</del>	<del>N/A</del>	<del>R5112</del>	<del>30 TAC Chapter 115, Storage of VOCs</del>	<del>No changing attributes.</del>

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 117.440(j)	atmosphere from any unit carbon monoxide (CO) emissions that exceed 400 ppmv at 3.0% oxygen, dry basis.	§ 117.435(b) § 117.435(d) § 117.440(a)(2)(D) § 117.8000(b) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d)	§ 117.445(f)(8)	[G]§ 117.445(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-2A	EU	R7201-2	NOx	30 TAC Chapter 117, Subchapter B	§ 117.410(a)(5)(B) § 117.410(a) § 117.410(b)(2) [G]§ 117.410(e)(1) § 117.410(e)(2) [G]§ 117.410(e)(3) § 117.410(e)(4) § 117.430(b) § 117.440(j)	No person shall allow the discharge from stationary gas turbines rated at 1.0 MW or greater, but less than 10 MW, NOx emissions in excess of 0.15 lb/MMBtu.	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a)(2)(D) § 117.440(k)(1) § 117.440(k)(2) § 117.8000(b) § 117.8000(c) § 117.8000(c)(1) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d)	§ 117.445(a) § 117.445(f) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-2A	EU	60KKKK-1	NOx	40 CFR Part 60, Subpart KKKK	§ 60.4320(a)-Table 1 § 60.4320(a) § 60.4320(b) § 60.4333(a)	<u>New turbine firing natural gas, mechanical drive, with a heat input at peak load of 50 MMBtu/h or less must meet the nitrogen oxides emission standard of 690 ng/J of useful output (5.5 lb/MWh). Modified or reconstructed turbine with a heat input at peak load of 50 MMBtu/h or less must meet the nitrogen oxides</u>	§ 60.4340(a) [G]§ 60.4400(a) § 60.4400(b) § 60.4400(b)(1) § 60.4400(b)(4) § 60.4400(b)(6)	None	§ 60.4375(b)

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						emission standard of 1,100 ng/J of useful output (8.7 lb/MWh).			
COMP-2A	EU	60KKKK-1	SO <sub>2</sub>	40 CFR Part 60, Subpart KKKK	§ 60.4330(a)(2) § 60.4333(a)	You must not burn in the subject stationary combustion turbine any fuel which contains total potential sulfur emissions in excess of 26 ng SO <sub>2</sub> /J (0.060 lb SO <sub>2</sub> /MMBtu) heat input. If your turbine simultaneously fires multiple fuels, each fuel must meet this requirement.	§ 60.4365 § 60.4365(a) § 60.4415(a) § 60.4415(a)(2) § 60.4415(a)(2)(ii)	§ 60.4365(a)	§ 60.4375(a)
COMP-3	EU	R7201-1	CO	30 TAC Chapter 117, Subchapter B	§ 117.410(c)(1) § 117.410(c)(1)(B) § 117.440(j)	No person shall allow the discharge into the atmosphere from any unit carbon monoxide (CO) emissions that exceed 400 ppmv at 3.0% oxygen, dry basis.	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a) § 117.8000(b) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) ** See Periodic Monitoring Summary	§ 117.445(a) § 117.445(f) § 117.445(f)(1) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-3	EU	R7201-1	NO <sub>x</sub>	30 TAC Chapter 117, Subchapter B	§ 117.410(a)(5)(B) § 117.410(a) § 117.410(b)(2) [G]§ 117.410(e)(1) § 117.410(e)(2) [G]§ 117.410(e)(3) § 117.410(e)(4) § 117.430(b) § 117.440(j)	No person shall allow the discharge from stationary gas turbines rated at 1.0 MW or greater, but less than 10 MW, NO <sub>x</sub> emissions in excess of 0.15 lb/MMBtu.	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a) § 117.440(k)(1) § 117.440(k)(2) § 117.8000(b) § 117.8000(c)	§ 117.445(a) § 117.445(f) § 117.445(f)(1) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C)



Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 117.440(j)		§ 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) § 117.8140(a) § 117.8140(a)(1) § 117.8140(a)(2) § 117.8140(a)(2)(A) [G]§ 117.8140(a)(2)(B) § 117.8140(b)		[G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-4	EU	R7201-2	CO	30 TAC Chapter 117, Subchapter B	§ 117.410(c)(1) § 117.410(c)(1)(B) § 117.440(j)	No person shall allow the discharge into the atmosphere from any stationary internal combustion engine carbon monoxide (CO) emissions that exceed 400 ppmv at 3.0% oxygen, dry basis or alternatively, 3.0 g/hp-hr	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a)(2)(D) § 117.440(h) § 117.8000(b) § 117.8000(c) § 117.8000(c)(2) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) § 117.8140(a) § 117.8140(a)(1) § 117.8140(a)(2) § 117.8140(a)(2)(A) [G]§ 117.8140(a)(2)(B) § 117.8140(b)	§ 117.445(a) § 117.445(f) [G]§ 117.445(f)(3) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) [G]§ 117.445(e) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-4	EU	R7201-2	NOx	30 TAC Chapter 117, Subchapter B	§ 117.410(a)(4)(B)(i) § 117.410(a) § 117.410(a)(4)(F) § 117.410(b)(2) [G]§ 117.410(e)(1) § 117.410(e)(2)	No person shall allow the discharge from gas-fired lean-burn engines placed into service before June 1, 2007, that have not been modified, reconstructed, or relocated on or after June 1,	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a)(2)(D) § 117.440(h) § 117.440(k)(1)	§ 117.445(a) § 117.445(f) [G]§ 117.445(f)(3) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) [G]§ 117.445(e) § 117.8010 [G]§ 117.8010(1) § 117.8010(2)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					[G]§ 117.410(e)(3) § 117.410(e)(4) § 117.430(b) § 117.430(b)(7) § 117.440(j)	2007.NOx emissions in excess of 0.70 g/hp-hr.	§ 117.440(k)(2) § 117.8000(b) § 117.8000(c) § 117.8000(c)(1) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) § 117.8140(a) § 117.8140(a)(1) § 117.8140(a)(2) § 117.8140(a)(2)(A) [G]§ 117.8140(a)(2)(B) § 117.8140(b)		§ 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-4	EU	63ZZZZ-1	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.8 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b) § 63.6625(h) § 63.6625(j)	For each existing non-emergency, non-black start 4SLB remote stationary RICE with a site rating greater than 500 HP, located at an area source, you must comply with the requirements as specified in Table 2d.8.a-c.	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6603(f) § 63.6625(j) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)



### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
							§ 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) § 117.8140(a) § 117.8140(a)(1) § 117.8140(a)(2) § 117.8140(a)(2)(A) [G]§ 117.8140(a)(2)(B) § 117.8140(b)		§ 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-5	EU	R7201-2	NO <sub>x</sub>	30 TAC Chapter 117, Subchapter B	§ 117.410(a)(4)(B)(i) § 117.410(a) § 117.410(a)(4)(F) § 117.410(b)(2) [G]§ 117.410(e)(1) § 117.410(e)(2) [G]§ 117.410(e)(3) § 117.410(e)(4) § 117.430(b) § 117.430(b)(7) § 117.440(j)	No person shall allow the discharge from gas-fired lean-burn engines placed into service before June 1, 2007, that have not been modified, reconstructed, or relocated on or after June 1, 2007, NO <sub>x</sub> emissions in excess of 0.70 g/hp-hr.	§ 117.435(a)(1) § 117.435(a)(3) § 117.435(b) § 117.435(d) § 117.440(a)(2)(D) § 117.440(h) § 117.440(k)(1) § 117.440(k)(2) § 117.8000(b) § 117.8000(c) § 117.8000(c)(1) § 117.8000(c)(3) § 117.8000(c)(5) § 117.8000(c)(6) [G]§ 117.8000(d) § 117.8140(a) § 117.8140(a)(1) § 117.8140(a)(2) § 117.8140(a)(2)(A) [G]§ 117.8140(a)(2)(B) § 117.8140(b)	§ 117.445(a) § 117.445(f) [G]§ 117.445(f)(3) § 117.445(f)(8)	§ 117.435(f) § 117.445(b) [G]§ 117.445(c) [G]§ 117.445(e) § 117.8010 [G]§ 117.8010(1) § 117.8010(2) § 117.8010(2)(A) § 117.8010(2)(B) § 117.8010(2)(C) § 117.8010(2)(D) [G]§ 117.8010(3) § 117.8010(4) [G]§ 117.8010(5) § 117.8010(6) [G]§ 117.8010(7)
COMP-5	EU	63ZZZZ-1	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6603(a)-Table 2d.8 § 63.6595(a)(1) § 63.6603(f) § 63.6605(a) § 63.6605(b)	For each existing non-emergency, non-black start 4SLB remote stationary RICE with a site rating greater than 500 HP, located at an area source,	§ 63.6625(j) § 63.6640(a) § 63.6640(a)-Table 6.9.a.i § 63.6640(a)-Table 6.9.a.ii	§ 63.6603(f) § 63.6625(j) § 63.6655(e) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(e) § 63.6650(f)

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					[G]§ 60.4243(d) § 60.4243(g) § 60.4246	manufactured on or after 01/01/2009 must comply with a NOx emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.		§ 60.4245(b)	
GEN-1A	EU	60JJJJ-1	VOC	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(1) [G]§ 60.4243(d) § 60.4243(g) § 60.4246	Owners and operators of stationary emergency SI ICE with a maximum engine power greater than or equal to 130 HP and were manufactured on or after 01/01/2009 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4237(b)	§ 60.4243(a)(1) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(3) § 60.4245(b)	[G]§ 60.4245(e)
GEN-1A	EU	63ZZZZ-4	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part.	None	None	None
GEN-2A	EU	R7201-34	Exempt	30 TAC Chapter 117, Subchapter B	<del>§ 117.403(a)(7)(D)</del> <del>[G]§ 117.403(a)(8)</del> § 117.403(a) <del>[G]§ 117.410(f)</del>	Units exempt from this division, except as specified in §§117.440(i), 117.445(f)(4) and (9), 117.450 and 117.454, include <u>stationary gas</u>	<del>§ 117.8140(a)</del> <del>§ 117.8140(a)(3)None</del>	§ 117.440(i) § 117.445(f) § 117.445(f)(4) <del>[G]§ 117.445(f)(9)</del>	None



### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						<del>turbines and stationary internal combustion engines used exclusively in emergency situations, except that operation for testing or maintenance is allowed for up to 100 hours per year, based on a rolling 12-month average. New, modified, reconstructed or relocated stationary diesel engine placed into service on or after June 1, 2007, are ineligible. stationary diesel engines placed into service before June 1, 2007 that operate less than 100 hours/year based on a rolling 12-month average and that has not been modified, reconstructed or relocated on or after June 1, 2007 per §117.403(a)(8)(A)-(B)</del>			
<u>GEN-2A</u>	<u>EU</u>	<u>60JJJJ-1</u>	<u>CO</u>	<u>40 CFR Part 60, Subpart JJJJ</u>	<u>§ 60.4233(e)-Table 1</u> <u>§ 60.4234</u> <u>§ 60.4243(b)</u> <u>§ 60.4243(b)(1)</u> <u>[G]§ 60.4243(d)</u> <u>§ 60.4243(g)</u> <u>§ 60.4246</u>	<u>Owners and operators of stationary emergency SI ICE with a maximum engine power greater than or equal to 130 HP and were manufactured on or after 01/01/2009 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart.</u>	<u>§ 60.4237(b)</u>	<u>§ 60.4243(a)(1)</u> <u>§ 60.4245(a)</u> <u>§ 60.4245(a)(1)</u> <u>§ 60.4245(a)(2)</u> <u>§ 60.4245(a)(3)</u> <u>§ 60.4245(b)</u>	<u>[G]§ 60.4245(e)</u>
<u>GEN-2A</u>	<u>EU</u>	<u>60JJJJ-1</u>	<u>NO<sub>x</sub></u>	<u>40 CFR Part 60, Subpart JJJJ</u>	<u>§ 60.4233(e)-Table 1</u> <u>§ 60.4234</u> <u>§ 60.4243(b)</u>	<u>Owners and operators of stationary emergency SI ICE with a maximum engine power greater than or equal</u>	<u>§ 60.4237(b)</u>	<u>§ 60.4243(a)(1)</u> <u>§ 60.4245(a)</u> <u>§ 60.4245(a)(1)</u> <u>§ 60.4245(a)(2)</u>	<u>[G]§ 60.4245(e)</u>

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
					§ 60.4243(b)(1) [G]§ 60.4243(d) § 60.4243(g) § 60.4246	to 130 HP and were manufactured on or after 01/01/2009 must comply with a NOx emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.		§ 60.4245(a)(3) § 60.4245(b)	
GEN-2A	EU	60JJJJ-1	VOC	40 CFR Part 60, Subpart JJJJ	§ 60.4233(e)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(1) [G]§ 60.4243(d) § 60.4243(g) § 60.4246	Owners and operators of stationary emergency SI ICE with a maximum engine power greater than or equal to 130 HP and were manufactured on or after 01/01/2009 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4237(b)	§ 60.4243(a)(1) § 60.4245(a) § 60.4245(a)(1) § 60.4245(a)(2) § 60.4245(a)(3) § 60.4245(b)	[G]§ 60.4245(e)
GEN-2A	EU	63ZZZZ-34	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6590(c)§ 63.6603(a) Table 2d.4 § 63.6595(a)(1) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(f) § 63.6625(h) § 63.6625(i) § 63.6640(f)(1) § 63.6640(f)(2) § 63.6640(f)(2)(i) § 63.6640(f)(4) § 63.6640(f)(4)(i)	Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines as applicable. No further requirements apply for such engines under this part. For each existing emergency stationary CI RICE and black start stationary CI RICE, located at an area source, you must comply	None§ 63.6625(i) § 63.6640(a) § 63.6640(a) Table 6.9.a.i § 63.6640(a) Table 6.9.a.ii	None§ 63.6625(i) § 63.6655(e) § 63.6655(f) § 63.6660(a) § 63.6660(b) § 63.6660(c)	None§ 63.6640(e) § 63.6650(f)



### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						<del>with the requirements as specified in Table 2d.4.a-c.</del>			
GEN-3	EU	R7201-4	Exempt	30 TAC Chapter 117, Subchapter B	§ 117.403(a)(7)(D) § 117.403(a)	Units exempt from this division, except as specified in §§ 117.440(i), 117.445(f)(4) and (9), 117.450 and 117.454, include stationary gas turbines and stationary internal combustion engines used exclusively in emergency situations, except that operation for testing or maintenance is allowed for up to 100 hours per year, based on a rolling 12-month average. New, modified, reconstructed or relocated stationary diesel engine placed into service on or after June 1, 2007, are ineligible.	§ 117.8140(a) § 117.8140(a)(3)	§ 117.440(i) § 117.445(f) § 117.445(f)(4)	None
GEN-3	EU	60JJJJ-2	CO	40 CFR Part 60, Subpart JJJJ	§ 60.4233(d)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(1) [G]§ 60.4243(d) § 60.4243(g) § 60.4246	Owners and operators of stationary emergency SI ICE with a maximum engine power greater than 25 HP and less than 100 HP and were manufactured on or after 01/01/2009 must comply with a CO emission limit of 387 g/HP-hr, as listed in Table 1 to this subpart.	§ 60.4237(c)	§ 60.4243(a)(1) § 60.4245(a) § 60.4245(a)(2) § 60.4245(a)(3) § 60.4245(b)	None
GEN-3	EU	60JJJJ-2	HC and NO <sub>x</sub>	40 CFR Part 60, Subpart JJJJ	§ 60.4233(d)-Table 1 § 60.4234 § 60.4243(b) § 60.4243(b)(1)	Owners and operators of stationary emergency SI ICE with a maximum engine power greater than 25 HP and less than 100 HP and	§ 60.4237(c)	§ 60.4243(a)(1) § 60.4245(a) § 60.4245(a)(2) § 60.4245(a)(3) § 60.4245(b)	None

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						the requirements of this division, except as specified.			
SLOP-TK-1	EU	R5172-1	VOC	30 TAC Chapter 115, Oil and Natural Gas Service	§ 115.172(a)(3) § 115.172(a)(3)(A) § 115.175(c)	Except for the control requirements in §115.175(b) or (c) of this title (relating to Storage Tank Control Requirements), any storage tank that meets one of the specified conditions in §§115.172(a)(3)(A)-(E) is exempt from the requirements in this division.	§ 115.175(c)(2)	§ 115.180 § 115.180(2) [G]§ 115.180(8)	None
SLOP-TK-1	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
SLOP-TK-2	EU	R5172-1	VOC	30 TAC Chapter 115, Oil and Natural Gas Service	§ 115.172(a)(3) § 115.172(a)(3)(A) § 115.175(c)	Except for the control requirements in §115.175(b) or (c) of this title (relating to Storage Tank Control Requirements), any storage tank that meets one of the specified conditions in §§115.172(a)(3)(A)-(E) is exempt from the requirements in this division.	§ 115.175(c)(2)	§ 115.180 § 115.180(2) [G]§ 115.180(8)	None
SLOP-TK-2	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None

RB

Rebecca Beatty

Superseded by new requirements under Division 7

Reply

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### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						<del>requirements of this division.</del>			
SLOP-TK-3	EU	R5172-1	VOC	30 TAC Chapter 115, Oil and Natural Gas Service	§ 115.172(a)(3) § 115.172(a)(3)(A) § 115.175(c)	Except for the control requirements in §115.175(b) or (c) of this title (relating to Storage Tank Control Requirements), any storage tank that meets one of the specified conditions in §§115.172(a)(3)(A)-(E) is exempt from the requirements in this division.	§ 115.175(c)(2)	§ 115.180 § 115.180(2) [G]§ 115.180(8)	None
<del>SLOP-TK-3</del>	<del>EU</del>	<del>R5112</del>	<del>VOC</del>	<del>30 TAC Chapter 115, Storage of VOCs</del>	<del>§ 115.111(a)(1)</del>	<del>Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.</del>	<del>[G]§ 115.117</del>	<del>§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)</del>	<del>None</del>

### New Source Review Authorization References

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

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits by Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: <del>76653</del> <u>179910</u>	Issuance Date: <del>07/19/2021</del> <u>05/29/2025</u>
Permits By Rule (30 TAC Chapter 106) for the Application Area	
<del>Number: 106.472</del>	<del>Version No./Date: 09/04/2000</del>
Number: 106.511	Version No./Date: 09/04/2000



### New Source Review Authorization References by Emissions Unit

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

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization**
COMP-1	CENTAUR 40-4700 TURBINE	<del>76653</del> <u>179910</u>
COMP-2 <del>A</del>	CENTAUR 40-4700 TURBINE	<u>179910</u> <del>76653</del>
COMP-3	TAURUS 60-7800S TURBINE	<u>179910</u> <del>76653</del>
COMP-4	UNIT #4 CAT G3612 ENGINE	<u>179910</u> <del>76653</del>
COMP-5	UNIT #5 CAT G3612 ENGINE	<u>179910</u> <del>76653</del>
<del>FO-TK-1</del>	<del>DIESEL TANK</del>	<del>106.472/09/04/2000</del>
GEN-1A	KOHLER PSI 125REZGC	106.511/09/04/2000
GEN-2 <del>A</del>	<del>KOHLER STANDBY GENERATOR</del> <u>CATERPILLAR DG350 GENERATOR</u>	106.511/09/04/2000
GEN-3	KOHLER NG EMERGENCY GENERATOR	106.511/09/04/2000
LD-1	SLOP OIL LOADING 1	<u>179910</u> <del>76653</del>
LD-2	SLOP OIL LOADING 2	<u>179910</u> <del>76653</del>
SLOP-TK-1	SLOP OIL TANK 1	<u>179910</u> <del>76653</del>
SLOP-TK-2	SLOP OIL TANK 2	<u>179910</u> <del>76653</del>
SLOP-TK-3	SLOP OIL TANK 3	<u>179910</u> <del>76653</del>

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

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

Date: 06/12/2025
Permit No.: O3868
Regulated Entity No.: 100542588
Company Name: Atmos Energy Corporation

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
11	MS-A	No	COMP-1	OP-UA11	179910	Update NSR Authorization
12	MS-C	No	COMP-2	OP-SUMR	76653	Remove replaced turbine
13	MS-C	Yes	COMP-2A	OP-UA11	179910	Add new turbine
14	MS-A	No	COMP-3	OP-UA11	179910	Update NSR Authorization
15	MS-A	No	COMP-4	OP-UA2	179910	Update NSR Authorization
16	MS-A	No	COMP-5	OP-UA2	179910	Update NSR Authorization
17	MS-C	No	GEN-2	OP-SUMR	106.511/09/04/2000	Remove replaced generator engine
18	MS-C	Yes	GEN-2A	OP-UA2	106.511/09/04/2000	Add new generator engine
19	MS-A	No	LD-1	OP-UA4	179910	Update NSR Authorization
20	MS-A	No	LD-2	OP-UA4	179910	Update NSR Authorization



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

Date: 06/12/2025
Permit No.: O3868
Regulated Entity No.: 100542588
Company Name: Atmos Energy Corporation

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

			Unit/Group	Process		
Revision No.	Revision Code	New Unit	ID No.	Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
21	MS-A	No	SLOP-TK-1	OP-UA3	179910	Update NSR Authorization
22	MS-A	No	SLOP-TK-2	OP-UA3	179910	Update NSR Authorization
23	MS-A	No	SLOP-TK-3	OP-UA3	179910	Update NSR Authorization
24	MS-C	No	FO-TK-1	OP-SUMR	106.472/09/04/2000	Remove diesel tank

**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.
06/12/2025	O3868	100542588

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
D	12	COMP-2	OP-SUMR	Centaur 40-4700 Turbine	Y	76653	
A	13	COMP-2A	OP-UA11	Centaur 40-4700 Turbine	Y	179910	
D	17	GEN-2	OP-SUMR	Kohler Standby Generator		106.511/09/04/2000	
A	18	GEN-2A	OP-UA2	Caterpillar DG350 Generator		106.511/09/04/2000	
D	24	FO-TK-1	OP-SUMR	Diesel Tank		106.472/09/04/2000	

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

Date	Permit Number	Regulated Entity Number
06/12/2025	O3868	100542588

Unit ID No.	PBR No.	Version No./Date
GEN-2A	106.511	09/04/2000

**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
06/12/2025	O3868	100542588

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
GEN-2A	106.511	09/04/2000	Maintain records of engine operation to demonstrate compliance with annual operating limit under 106.511

**Stationary Reciprocating Internal Combustion Engine 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.
6/12/25	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
GEN-2A	R7201-4	50+			EMERG	NG			

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 4)**

**Federal Operating Permit Program**

**Table 2a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)**

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines  
Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
6/12/25	O3868	100542588

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
GEN-2A	63ZZZZ-4	AREA	300-500	06+			

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 8)**

**Federal Operating Permit Program**

**Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines**

**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
6/12/25	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Construction/ Reconstruction/ Modification Date	Test Cell	Exemption	Temp Replacement	Horsepower	Fuel	AEL No.	Lean Burn	Commencing
GEN-2A	60JJJJ-1	YES	NO	NONE	NO	130-500E	NATGAS			CON

**Stationary Reciprocating Internal Combustion Engine Attributes**  
**Form OP-UA2 (Page 9)**  
**Federal Operating Permit Program**  
**Table 4b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**  
**Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
6/12/25	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Manufacture Date	Displacement	Certified	Operation	Certified Modification	Service	Severe Duty	Optional Compliance
GEN-2A	60JJJJ-1	N0111+E		YES	YES		EMERG		



Storage Tank/Vessel Attributes  
Form OP-UA3 (Page 4)  
Federal Operating Permit Program  
Table 4a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter B: Storage of Volatile Organic Compounds (VOCs)  
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Alternate Control Requirement	ACR ID No.	Product Stored	Storage Capacity	Throughput	Potential to Emit	Uncontrolled Emissions
<del>SLOP-TK-1</del>	<del>R5112</del>	<del>NO</del>		<del>VOC1</del>	<del>A1K-25K</del>			
<del>SLOP-TK-2</del>	<del>R5112</del>	<del>NO</del>		<del>VOC1</del>	<del>A1K-25K</del>			
<del>SLOP-TK-3</del>	<del>R5112</del>	<del>NO</del>		<del>VOC1</del>	<del>A1K-25K</del>			

Storage Tank/Vessel Attributes  
Form OP-UA3 (Page 5)  
Federal Operating Permit Program  
Table 4b: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter B: Storage of Volatile Organic Compounds (VOCs)  
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Construction Date	Tank Description	True Vapor Pressure	Primary Seal	Secondary Seal	Control Device Type	Control Device ID No.
<del>SLOP TK 1</del>	<del>R5112</del>		<del>NONE1</del>	<del>1</del>				
<del>SLOP TK 2</del>	<del>R5112</del>		<del>NONE1</del>	<del>1</del>				
<del>SLOP TK 3</del>	<del>R5112</del>		<del>NONE1</del>	<del>1</del>				

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 6)**  
**Federal Operating Permit Program**

**Table 3a: 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 Area**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Megawatt Rating	RACT Date Placed in Service (ICI)	Functionally Identical Replacement (ICI)	Service Type (ICI)	NO <sub>x</sub> Emission Limitation (ICI)	23C-Option
COMP-2A	R7201-1	1-10			TURB	410A	
COMP-2A	R7201-2	1-10			TURB	410A	

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.
06/12/2025	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-2A	R7201-1			1HR	OTHER	MERT
COMP-2A	R7201-2			1HR	OTHER	MERT

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.
06/12/2025	O3868	100542588

Unit ID No.	SOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Monitoring System	NH <sub>3</sub> Emission Limitation	NH <sub>3</sub> Monitoring
COMP-2A	R7201-1	X40A	410C	OTHER		
COMP-2A	R7201-2	X40A2-D	410C	OTHER		

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 12)**  
**Federal Operating Permit Program**  
**Table 6a: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

Unit ID No.	SOP Index No.	Unit Type	Construction/Modification Date	Heat Input	Subject to Da	Service Type	NO <sub>x</sub> Standard	Fuel Type
COMP-2A	60KKKK-1	SIMPLE	2005C	10-50	No	NOTER	YES	NGO

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 13)**  
**Federal Operating Permit Program**  
**Table 6b: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

Unit ID No.	SOP Index No.	75% of Peak	30 MW	Turbine Use	NO <sub>x</sub> Control	NO <sub>x</sub> Monitoring	Common Steam Header	Duct Burner
COMP-2A	60KKKK-1	NO		MECH	NO	ANNUAL		

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 14)**  
**Federal Operating Permit Program**  
**Table 6c: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

Unit ID No.	SOP Index No.	Location	SO <sub>2</sub> Standard	Fuel Monitoring	Fuel Quality	Performance Test	Intermediate Storage	Fuel Schedules
COMP-2A	60KKKK-1	NO	NO	YES	PRCHS	CTRCT		



**Texas Commission on Environmental Quality**  
**Monitoring Requirements**  
**Form OP-MON (Page 3)**  
**Federal Operating Permit Program**  
**Table 1c: CAM/PM Case-By-Case Additions**

<b>I. Identifying Information</b>		
Account No.: ED0238T	RN No.: 100542588	CN: 602730319
Permit No: 03868		Project No.: 37404
Area Name: Howard Compressor Station		
Company Name: Atmos Energy Corporation		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.: 13		
Unit/EPN/Group/Process ID No.: COMP-2A		
Applicable Form: OP-UA11		
<b>III. Applicable Regulatory Requirement</b>		
Name: 30 TAC 117, Subchapter B		
SOP/GOP Index No.: R7201-1		
Pollutant: CO		
Main Standard: 30 TAC 117.410(c)(1)		
Monitoring Type: PM		
Unit Size: SM		
Deviation Limit: Maximum CO concentration of 400 ppmv at 3% O2, dry basis		
<b>IV. Control Device Information</b>		
Control Device ID No.:		
Device Type:		
<b>V. CAM Case-by-case</b>		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
<b>VI. Periodic Monitoring Case-by-case</b>		
Indicator: CO concentration		Minimum Frequency: Annual
Averaging Period: Hourly		
Periodic Monitoring Text: EPA Reference Method 10 and ASTM D6348 sampling using FTIR/NDIR analysis		

**Texas Commission on Environmental Quality**  
**Monitoring Requirements**  
**Form OP-MON (Page 3)**  
**Federal Operating Permit Program**  
**Table 1c: CAM/PM Case-By-Case Additions**

<b>I. Identifying Information</b>		
Account No.: ED0238T	RN No.: 100542588	CN: 602730319
Permit No: 03868	Project No.: 37404	
Area Name: Howard Compressor Station		
Company Name: Atmos Energy Corporation		
<b>II. Unit/Emission Point/Group/Process Information</b>		
Revision No.: 13		
Unit/EPN/Group/Process ID No.: COMP-2A		
Applicable Form: OP-UA11		
<b>III. Applicable Regulatory Requirement</b>		
Name: 30 TAC 117, Subchapter B		
SOP/GOP Index No.: R7201-1		
Pollutant: NOx		
Main Standard: 30 TAC 117.410(a)(5)(B)		
Monitoring Type: PM		
Unit Size: SM		
Deviation Limit: Maximum NOx concentration of 0.15 lb/MMBtu		
<b>IV. Control Device Information</b>		
Control Device ID No.:		
Device Type:		
<b>V. CAM Case-by-case</b>		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
<b>VI. Periodic Monitoring Case-by-case</b>		
Indicator: NOx concentration	Minimum Frequency: Annual	
Averaging Period: Hourly		
Periodic Monitoring Text: EPA Reference Method 7E and ASTM D6348 sampling using FTIR analysis		

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 86)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits		
◆ 1.	The application area includes at least one Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.1 is "No," go to Section XII.C. If the response to XII.B.1 is "Yes," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
◆ 2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
◆ 6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

# Application Area-Wide Applicability Determinations and General Information

## Form OP-REQ1 (Page 87)

### Federal Operating Permit Program

### Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

For SOP applications, answer ALL questions unless otherwise directed.

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

XII. New Source Review (NSR) Authorizations (continued)		
B. Air Quality Standard Permits (continued)		
◆ 11.	The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. <i>If the response to XII.B.12 is "No," go to Question XII.B.15.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	<input type="checkbox"/> Yes <input type="checkbox"/> No
◆ 15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
◆ 16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C. Flexible Permits		
1.	The application area includes at least one Flexible Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D. Multiple Plant Permits		
1.	The application area includes at least one Multi-Plant Permit NSR authorization.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**Application Area-Wide Applicability Determinations and General Information**  
**Form OP-REQ1 (Page 88)**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

Date	Permit No.	Regulated Entity No.
06/12/2025	O3868	100542588

For SOP applications, answer ALL questions unless otherwise directed.

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

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

**E. PSD Permits and PSD Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: [www.tceq.texas.gov/permitting/air/titlev/site/site\\_experts.html](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).

**F. Nonattainment (NA) Permits and NA Major Pollutants**

Permit No.	Issuance Date	Pollutant(s):	Permit No.	Issuance Date	Pollutant(s):

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: [www.tceq.texas.gov/permitting/air/titlev/site/site\\_experts.html](http://www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html).

**G. NSR Authorizations with FCAA § 112(g) Requirements**

NSR Permit No.	Issuance Date	NSR Permit No.	Issuance Date	NSR Permit No	Issuance Date

**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.
06/12/2025	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
<del>76653</del>	<del>07/19/2021</del>				
179910	05/29/2025				

- ◆ **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.*

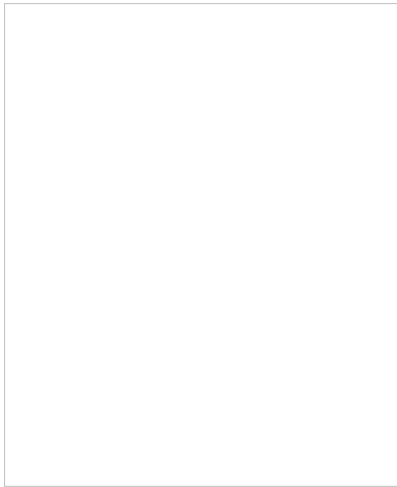
PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date
<del>106.472</del>	<del>09/04/2000</del>				
106.511	09/04/2000				

- ◆ **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

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**From:** Burdorf, Randy <[Randy.Burdorf@atmosenergy.com](mailto:Randy.Burdorf@atmosenergy.com)>  
**Sent:** Monday, June 9, 2025 1:21 PM  
**To:** Emily Knodell <[Emily.Knodell@tceq.texas.gov](mailto:Emily.Knodell@tceq.texas.gov)>  
**Cc:** Marais, Chris <[Chris.Marais@atmosenergy.com](mailto:Chris.Marais@atmosenergy.com)>; Engwall, Stephanie <[Stephanie.Engwall@atmosenergy.com](mailto:Stephanie.Engwall@atmosenergy.com)>  
**Subject:** FW: [EXT] FW: Working Draft Permit -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

Ms. Knodell,

Attached please find the Atmos response/comments to the TCEQ's May 13, 2025, email pertaining to the Howard CS SOP WDP which include:

1. The reciprocating compressor engines are missing R7201-2 citations for NOx and
2. The slop tanks now have requirements showing under 115 Subchapter B Division 1 and Division 7, instead of just Division 7.

Since the Draft WDP was transmitted to Atmos on May 13, 2025, the Howard CS was issued a non-rule standard permit (NRSP) on May 29, 2029. Under the new standard permit registration, one compressor turbine (COMP-2) was replaced (COMP-2A) and the diesel emergency generator engine (GEN-2) was replaced with a new natural gas generator engine (GEN-2A). The diesel tank (FO-TK-1) we had requested to be added to the SOP held fuel for the diesel generator engine, so with the removal of that engine the diesel tank has been removed as well. The changes to the SOP associated with the emissions units authorized with the 5/29/2025 NRSP are addressed in the attached TCEQ SOP Forms:

1. Updated Form OP-2, Table 2 (2 pages)
2. Updated Form OP-SUMR, Table 1
3. Updated Form OP-PBRSUP, Table B, Table D
4. Updated Form OP-UA2, Table 1a, Table 2a, Table 4a, Table 4b
5. Updated Form OP-UA3, Table 4a, Table 4b
6. Updated Form OP-UA11, Table 3a, Table 3b, Table 3c, Table 6a, Table 6b, Table 6c
7. Updated Form OP-MON, Table 1c
8. Updated Form OP-REQ1 (Page 86, Page 87, Page 88, Page 89)

The attached copy of the WDP includes markups for the additional revisions as well as the two identified corrections for the previously requested revisions.

Atmos will certify and submit the revised SOP Application Forms to the TCEQ via STEERs per your May 13, 2025 email. Additionally, Atmos will email a copy of the updated Howard CS SOP Forms to EPA Region 6 and to the TCEQ Region 4. Consistent with your May 13, 2025, email instructions, Atmos will notify you via email when these updates have been submitted.

Please contact me if you have any questions regarding this correspondence.

**Stationary Reciprocating Internal Combustion Engine 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	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
COMP-4	R7201-1	50+			ENG	NG	LEANBURN	2007-	
COMP-5	R7201-1	50+			ENG	NG	LEANBURN	2007-	



**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 2)**

**Federal Operating Permit Program**

**Table 1b: 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	O3868	100542588

Unit ID No.	SOP/GOP Index No.	NO <sub>x</sub> Emission Limitation	23-C Option	30 TAC Chapter 116 Limit	EGF System CAP Unit	NO <sub>x</sub> Averaging Method	NO <sub>x</sub> Reduction	NO <sub>x</sub> Monitoring System
COMP-4	R7201-1	410A				1HR	OTHER	MERT
COMP-5	R7201-1	410A				1HR	OTHER	MERT

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 3)**

**Federal Operating Permit Program**

**Table 1c: 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    Revised 05/09/2025	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Averaging Method	CO Monitoring System	NH <sub>3</sub> Emission Limitation	NH <sub>3</sub> Monitoring
COMP-4	R7201-1	X40A	410C	1HR	OTHER		
COMP-5	R7201-1	X40A	410C	1HR	OTHER		
COMP-4	R7201-2	X40A2-D	410C	1HR	OTHER		
COMP-5	R7201-2	X40A2-D	410C	1HR	OTHER		

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 6)**  
**Federal Operating Permit Program**  
**Table 3a: 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 Area**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	SOP/GOP Index No.	Megawatt Rating	RACT Date Placed in Service (ICI)	Functionally Identical Replacement (ICI)	Service Type (ICI)	NO <sub>x</sub> Emission Limitation (ICI)	23C-Option
COMP-1	R7201-1	1-10			TURB	410A	
COMP-2	R7201-1	1-10			TURB	410A	
COMP-3	R7201-1	1-10			TURB	410A	

**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

**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    Revised 05/09/2025	O3868	100542588

Unit ID No.	SOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Monitoring System	NH3 Emission Limitation	NH3 Monitoring
COMP-1	R7201-1	X40A	410C	OTHER		
COMP-2	R7201-1	X40A	410C	OTHER		
COMP-3	R7201-1	X40A	410C	OTHER		
COMP-1	R7201-2	X40A2-D	410C	OTHER		
COMP-2	R7201-2	X40A2-D	410C	OTHER		
COMP-3	R7201-2	X40A2-D	410C	OTHER		

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 12)**  
**Federal Operating Permit Program**  
**Table 6a: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	SOP Index No.	Unit Type	Construction/Modification Date	Heat Input	Subject to Da	Service Type	NO <sub>x</sub> Standard	Fuel Type
COMP-2	60KKKK-1	SIMPLE	2005R	10-50	NO	NOTER	YES	NGO

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 13)**  
**Federal Operating Permit Program**  
**Table 6b: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	SOP Index No.	75% of Peak	30 MW	Turbine Use	NO <sub>x</sub> Control	NO <sub>x</sub> Monitoring	Common Steam Header	Duct Burner
COMP-2	60KKKK-1	NO		MECH	NO	ANNUAL		

**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 14)**  
**Federal Operating Permit Program**  
**Table 6c: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	SOP Index No.	Location	SO <sub>2</sub> Standard	Fuel Monitoring	Fuel Quality	Performance Test	Intermediate Storage	Fuel Schedules
COMP-2	60KKKK-1	NO	NO	YES	PRCHS	SAMP		



**From:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Sent:** Tuesday, May 13, 2025 3:22 PM  
**To:** Marlais, Chris <Chris.Marlais@atmosenergy.com>  
**Cc:** Burdorf, Randy <Randy.Burdorf@atmosenergy.com>; Engwall, Stephanie <Stephanie.Engwall@atmosenergy.com>  
**Subject:** [EXT] Working Draft Permit -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

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Good afternoon Mr. Marlais,

I have conducted a technical review of *minor revision* application for **Atmos Energy Corporation/Howard Compressor Station**. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. You may notice some items are highlighted in **green** throughout the attached WDP. I did this when I ran a document comparison of the current effective permit vs. the WDP I am sending now, it helps me keep track of what is being updated and might help you as well. The highlights will be removed later on when I prepare the project for management review. Please review the WDP and submit to me any comments you have by **June 12, 2025**.

**Summary of Changes:**

- COMP-1, COMP-3, COMP-4, COMP-5: updated 30 TAC Ch 117 applicability based on the UA form provided. Added new Index No. R7201-2.
- COMP-2: updated NSPS KKKK & 30 TAC Ch 117 applicability based on UA form provided. Added new Index No. R7201-2.
- SLOP-TK-1, SLOP-TK-2, SLOP-TK-3: Added 30 TAC Ch 115 applicability.
- FO-TK-1: Added new unit to the permit. Note: This unit shows non-applicability based on the UA data provided. It will appear with its preconstruction authorization listed on the NSR Authorizations References by Emission Units Table, but it will have no applicable requirements (Draft Page 41).

Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at [http://secure-web.cisco.com/1e6fcWEpP4J8S\\_Hr4xFLtq-Cg-1KNb8SN2qk4FURgodhPy96y1yx34i8QR7bljr3EKCXUDGUcuYyLAQUry7qazifyUtr5JeE9i:16Z1KxywTGPys7hdWd9dF\\_ZP5h1wv2AaT0GgG0K4Yr\\_QaZvP\\_HLM4M7MPOMLbs5yBP8e6KVOAyW5664sdtWvD3rsOL66aNkFWLjFxcvX5lpUwMD228IE\\_hT7b04M7F9d751SerG\\_KJmmuy7KCz3puMKEds:qQ\\_Ki6\\_9hCDvu0lDAcnRQhttp%3A%2F%2Fwww.tceq.texas.gov%2FAssets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle\\_V%2Fsop\\_wdp\\_factsheet.pdf](http://secure-web.cisco.com/1e6fcWEpP4J8S_Hr4xFLtq-Cg-1KNb8SN2qk4FURgodhPy96y1yx34i8QR7bljr3EKCXUDGUcuYyLAQUry7qazifyUtr5JeE9i:16Z1KxywTGPys7hdWd9dF_ZP5h1wv2AaT0GgG0K4Yr_QaZvP_HLM4M7MPOMLbs5yBP8e6KVOAyW5664sdtWvD3rsOL66aNkFWLjFxcvX5lpUwMD228IE_hT7b04M7F9d751SerG_KJmmuy7KCz3puMKEds:qQ_Ki6_9hCDvu0lDAcnRQhttp%3A%2F%2Fwww.tceq.texas.gov%2FAssets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle_V%2Fsop_wdp_factsheet.pdf). This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

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

Please notify me when these updates have been submitted.

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

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107

How are we doing? Fill out our online customer satisfaction survey at [http://secure-web.cisco.com/14zk9eNwQCILlEynd\\_AJYcsmFVhZrpF2s2MN7I\\_c2Z2Hik1lrhIA8XadHT8m4UfSkexvW\\_if\\_ISNIN6D5JOr5T51q1TrakTJHolWRkoplBdDq6RH6NIGs1\\_0Bke1MRJ6a2B8cSpGDbukZuLhnyV\\_QzHQRQScRXXM1yov:F5oYVOGCP9mBDbkCNlUXGH2e8uxdWJljlJWJlRQ5o2kxbk22WJmoxOTbafTtpaZmUoirdYrEDvYQ52aqr:4Dum7R3kehzt15KGzzYz7agnFQhttp%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey](http://secure-web.cisco.com/14zk9eNwQCILlEynd_AJYcsmFVhZrpF2s2MN7I_c2Z2Hik1lrhIA8XadHT8m4UfSkexvW_if_ISNIN6D5JOr5T51q1TrakTJHolWRkoplBdDq6RH6NIGs1_0Bke1MRJ6a2B8cSpGDbukZuLhnyV_QzHQRQScRXXM1yov:F5oYVOGCP9mBDbkCNlUXGH2e8uxdWJljlJWJlRQ5o2kxbk22WJmoxOTbafTtpaZmUoirdYrEDvYQ52aqr:4Dum7R3kehzt15KGzzYz7agnFQhttp%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey)

**From:** Marlais, Chris <Chris.Marlais@atmosenergy.com>  
**Sent:** Friday, May 9, 2025 11:42 AM  
**To:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Cc:** Burdorf, Randy <Randy.Burdorf@atmosenergy.com>; Engwall, Stephanie <Stephanie.Engwall@atmosenergy.com>  
**Subject:** RE: Technical Review -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

I'll get those changes made and back to you by 5/16/2025. Thank you for the description of the change request. That's helpful.

Chris Marlais  
Sr. Environmental Specialist  
Atmos Energy  
469-841-9076  
[chris.marlais@atmosenergy.com](mailto:chris.marlais@atmosenergy.com)

**From:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Sent:** Friday, May 9, 2025 11:38 AM  
**To:** Marlais, Chris <Chris.Marlais@atmosenergy.com>  
**Cc:** Burdorf, Randy <Randy.Burdorf@atmosenergy.com>; Engwall, Stephanie <Stephanie.Engwall@atmosenergy.com>  
**Subject:** [EXT] RE: Technical Review -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

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Good morning Mr. Marlais,

During the technical review, the following was found. Please resolve by **05/16/2025**.

In the application cover page, you mentioned completing two copies of the OP-UA2 Table 1c and OP-UA11 Table 3c to identify both methods for complying with a fuel flow monitoring requirement because the unit attribute forms only allow for one of these options to be selected. In this case, you would just need to select another Index Number and list it on the same page. SOP Index Numbers are used to distinguish different "operating scenarios" for a given unit and applicable rule. Different numbers must be used when entering more than one line of attributes on a Unit Attribute form for the same unit (or group of units) and rule. They provide an index of the requirements that apply while the unit is operating under the conditions expressed in the unit attribute form. So for example, you selected the Index No. R7201 for the COMP units. You would just add another Index No. on the same page, maybe "R7201-2" and fill out the tables for that particular operating scenario for each of the units.

1. **Form OP-UA2:** Please submit a revised Form OP-UA2 that includes both index numbers (operating scenarios) listed throughout the table.
2. **Form OP-UA11:** Please submit a revised Form OP-UA11 that includes both index numbers (operating scenarios) listed throughout the table.

Please let me know if you have any questions. Thank you and have a great weekend!

Best Regards,

Emily L. Knodell  
Permit Reviewer  
TCEQ – APD – OP Section (Title V)  
(512) 239-3107

How are we doing? Fill out our online customer satisfaction survey at [http://secure-web.cisco.com/1f8Ubs68yH\\_welc6ZyJAKG2eF1Dm2XlDFOLnY8JxJFbJheCmfbEwi920fmHvUmYVoeA\\_qNAEGASmbU2rYp35wuoTl31gYx8w7QB6U1AJsYUHVQXjzVbqOcy\\_PyKf1W35axfJZ\\_AtOdkwx1R0gCQVw1vIB3vXSERfIdFnMo8cZ:4btbwOC2zJPHGegU5ypJZ1gYMLuHdKAploGbB7Jj9f6Qf2C2X94qrN\\_bWwUYEyl5LmaZ1kbg9NBnsbpzWrrhttp%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey](http://secure-web.cisco.com/1f8Ubs68yH_welc6ZyJAKG2eF1Dm2XlDFOLnY8JxJFbJheCmfbEwi920fmHvUmYVoeA_qNAEGASmbU2rYp35wuoTl31gYx8w7QB6U1AJsYUHVQXjzVbqOcy_PyKf1W35axfJZ_AtOdkwx1R0gCQVw1vIB3vXSERfIdFnMo8cZ:4btbwOC2zJPHGegU5ypJZ1gYMLuHdKAploGbB7Jj9f6Qf2C2X94qrN_bWwUYEyl5LmaZ1kbg9NBnsbpzWrrhttp%3A%2F%2Fwww.tceq.texas.gov%2Fcustomersurvey)

**From:** Marlais, Chris <Chris.Marlais@atmosenergy.com>  
**Sent:** Thursday, December 12, 2024 3:29 PM  
**To:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Cc:** Burdorf, Randy <Randy.Burdorf@atmosenergy.com>; Engwall, Stephanie <Stephanie.Engwall@atmosenergy.com>  
**Subject:** RE: Technical Review -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

Received. Thank you, Emily.

Chris Marlais  
Sr. Environmental Specialist  
Atmos Energy  
469-841-9076  
[chris.marlais@atmosenergy.com](mailto:chris.marlais@atmosenergy.com)

**From:** Emily Knodell <Emily.Knodell@tceq.texas.gov>  
**Sent:** Thursday, December 12, 2024 3:05 PM  
**To:** Marlais, Chris <Chris.Marlais@atmosenergy.com>  
**Subject:** [EXT] Technical Review -- FOP 03868/Project 37404, Atmos Energy Corporation/Howard Compressor Station

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Good afternoon Mr. Chris Marlais,

My name is Emily Knodell and I have been assigned to the Federal Operating Permit (FOP) *minor revision* application of Permit No. **03868** for *Atmos Energy Corporation/Howard Compressor Station*. This application has been assigned Project No. **37404**. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

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

Please review the "SOP Technical Review Fact Sheet" located at [http://secure-web.cisco.com/130P4yn9njo22dtRMYx6birGJmRC-yyQzcPw17evXy/fjh4wutaY-8Ql0XIZ-Z7rCn\\_jX-nthGsk4nOPTjh3FaEe\\_SCthWJlUpAgzyJhPdudjlf1qWf4Ws-oYQORMSwfQZqaeNV0hrGDx9In5eCaIV36sbGla\\_Eknp6MrVWbDaHEOXqXb4t0q0-3s\\_I15dXl0v7Z2s2CjRmY8lYKcKuDTAFU-WL-un6g0y673sSE6jMCgUTq1c-sm8Q8c5yhttp%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle\\_V%2Fsoq\\_web\\_factsheet.pdf](http://secure-web.cisco.com/130P4yn9njo22dtRMYx6birGJmRC-yyQzcPw17evXy/fjh4wutaY-8Ql0XIZ-Z7rCn_jX-nthGsk4nOPTjh3FaEe_SCthWJlUpAgzyJhPdudjlf1qWf4Ws-oYQORMSwfQZqaeNV0hrGDx9In5eCaIV36sbGla_Eknp6MrVWbDaHEOXqXb4t0q0-3s_I15dXl0v7Z2s2CjRmY8lYKcKuDTAFU-WL-un6g0y673sSE6jMCgUTq1c-sm8Q8c5yhttp%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle_V%2Fsoq_web_factsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

I would appreciate a quick confirmation that this email has reached you.

Thank you for your cooperation.

Sincerely,

**Emily L. Knodell**  
Permit Reviewer  
O&A/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[emily.knodell@tceq.texas.gov](mailto:emily.knodell@tceq.texas.gov)

Phone: (512) 239-3107  
Fax: (512) 239-1400

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## 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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**ATMOS ENERGY CORPORATION**

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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? <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**

**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<sub>x</sub>      ☐ SO<sub>2</sub>      ☐ PM<sub>10</sub>      ☐ 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.

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**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		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
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  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR**

[Table 1](#)

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

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	5	FO-TK-1	OP-UA3	Diesel Tank		106.472/09/04/2000	

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**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**

<b>IV. Certification of Truth</b>			
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>			
I, <u>Marlan Jarzombek</u>		certify that I am the <u>Responsible Official (RO)</u>	
<i>(Certifier Name printed or typed)</i>		<i>(RO or DAR)</i>	
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:			
<i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>			
Time Period: From _____ to _____			
<i>(Start Date)</i>		<i>(End Date)</i>	
Specific Dates: <u>11/15/2024</u>			
<i>(Date 1)</i>		<i>(Date 2)</i>	
<i>(Date 3)</i>		<i>(Date 4)</i>	
<i>(Date 5)</i>		<i>(Date 6)</i>	
Signature: <u>Marlan Jarzombek</u>		Signature Date: <u>11/15/24</u>	
Title: <u>Vice President of Operations</u>			

**Permit By Rule Supplemental Table (Page 2)**  
**Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	PBR No.	Version No./Date
FO-TK-1	106.472	09/04/2000

1-7

**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.

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**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

**Stationary Reciprocating Internal Combustion Engine 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	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Horsepower Rating	RACT Date Placed in Service	Functionally Identical Replacement	Type of Service	Fuel Fired	Engine Type	ESAD Date Placed in Service	Diesel HP Rating
COMP-4	R7201-1	50+			ENG	NG	LEANBURN	2007-	
COMP-5	R7201-1	50+			ENG	NG	LEANBURN	2007-	

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 2)**

**Federal Operating Permit Program**

**Table 1b: 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	O3868	100542588

Unit ID No.	SOP/GOP Index No.	NO <sub>x</sub> Emission Limitation	23-C Option	30 TAC Chapter 116 Limit	EGF System CAP Unit	NO <sub>x</sub> Averaging Method	NO <sub>x</sub> Reduction	NO <sub>x</sub> Monitoring System
COMP-4	R7201-1	410A				1HR	OTHER	MERT
COMP-5	R7201-1	410A				1HR	OTHER	MERT

2-2



**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 3)**

**Federal Operating Permit Program**

**Table 1c: 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	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Averaging Method	CO Monitoring System	NH <sub>3</sub> Emission Limitation	NH <sub>3</sub> Monitoring
COMP-4	R7201-1	X40A	410C	1HR	OTHER		
COMP-5	R7201-1	X40A	410C	1HR	OTHER		

**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 3)**

**Federal Operating Permit Program**

**Table 1c: 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	O3868	100542588

Unit ID No.	SOP/GOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Averaging Method	CO Monitoring System	NH <sub>3</sub> Emission Limitation	NH <sub>3</sub> Monitoring
COMP-4	R7201-1	X40A2-D	410C	1HR	OTHER		
COMP-5	R7201-1	X40A2-D	410C	1HR	OTHER		

**Storage Tank/Vessel Attributes  
Form OP-UA3 (Page 3)  
Federal Operating Permit Program  
Table 3: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)  
Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels  
(Including Petroleum Liquid Storage Vessels)  
Texas Commission on Environmental Quality**

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

Unit ID No.	SOP/GOP Index No.	Product Stored	Storage Capacity	WW Tank Control	Maximum TVP	Storage Vessel Description	AMEL ID No.	Guidepole	Reid Vapor Pressure	Control Device ID No.
FO-TK-1	60Kb	VOL	10K-							

2-5

**Fugitive Emission Unit Attributes  
Form OP-UA3 (Page 70)  
Federal Operating Permit Program  
Table 27a: Title 30 Texas Administrative Code Chapter 115 (30 TAC Chapter 115)  
Subchapter B: Division 7: Oil and Natural Gas Service 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.	Control Requirement Exemptions	Alternate Control Requirement	ACR ID No.
SLOP-TK-1	R5172-1	6-		
SLOP-TK-2	R5172-1	6-		
SLOP-TK-3	R5172-1	6-		

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**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 6)**  
**Federal Operating Permit Program**  
**Table 3a: 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 Area**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	SOP/GOP Index No.	Megawatt Rating	RACT Date Placed in Service (ICI)	Functionally Identical Replacement (ICI)	Service Type (ICI)	NO <sub>x</sub> Emission Limitation (ICI)	23C-Option
COMP-1	R7201-1	1-10			TURB	410A	
COMP-2	R7201-1	1-10			TURB	410A	
COMP-3	R7201-1	1-10			TURB	410A	

2-7

**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

2-8

**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	O3868	100542588

Unit ID No.	SOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Monitoring System	NH3 Emission Limitation	NH3 Monitoring
COMP-1	R7201-1	X40A	410C	OTHER		
COMP-2	R7201-1	X40A	410C	OTHER		
COMP-3	R7201-1	X40A	410C	OTHER		

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**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	O3868	100542588

Unit ID No.	SOP Index No.	Fuel Flow Monitoring	CO Emission Limitation	CO Monitoring System	NH3 Emission Limitation	NH3 Monitoring
COMP-1	R7201-1	X40A2-D	410C	OTHER		
COMP-2	R7201-1	X40A2-D	410C	OTHER		
COMP-3	R7201-1	X40A2-D	410C	OTHER		

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**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 12)**  
**Federal Operating Permit Program**  
**Table 6a: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	SOP Index No.	Unit Type	Construction/Modification Date	Heat Input	Subject to Da	Service Type	NO <sub>x</sub> Standard	Fuel Type
COMP-2	60KKKK-1	SIMPLE	2005R	10-50	NO	NOTER	YES	NGO

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**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 13)**  
**Federal Operating Permit Program**  
**Table 6b: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	SOP Index No.	75% of Peak	30 MW	Turbine Use	NO <sub>x</sub> Control	NO <sub>x</sub> Monitoring	Common Steam Header	Duct Burner
COMP-2	60KKKK-1	NO		MECH	NO	ANNUAL		

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**Stationary Turbine Attributes**  
**Form OP-UA11 (Page 14)**  
**Federal Operating Permit Program**  
**Table 6c: Title 40 Code of Federal Regulations (40 CFR Part 60)**  
**Subpart KKKK: Stationary Combustion Turbines**  
**Texas Commission on Environmental Quality**

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

Unit ID No.	SOP Index No.	Location	SO <sub>2</sub> Standard	Fuel Monitoring	Fuel Quality	Performance Test	Intermediate Storage	Fuel Schedules
COMP-2	60KKKK-1	NO	NO	YES	PRCHS	SAMP		

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**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