

## Texas Commission on Environmental Quality

Title V Existing

4537

### Site Information (Regulated Entity)

|   |                           |
|---|---------------------------|
| What is the name of the permit area to be authorized? | PONDER COMPRESSOR STATION |
| Does the site have a physical address?                | Yes                       |
| Physical Address                                      |                           |
| Number and Street                                     | 4045 FLORENCE ROAD        |
| City  | PONDER                    |
| State   | TX                        |
| ZIP   | 76259                     |
| County  | DENTON                    |
| Latitude (N) (##.#####)                               | 33.155833                 |
| Longitude (W) (-###.#####)                            | 97.257777                 |
| Primary SIC Code                                      | 1311                      |
| Secondary SIC Code                                    |                           |
| Primary NAICS Code                                    | 211130                    |
| Secondary NAICS Code                                  |                           |
| Regulated Entity Site Information                     |                           |
| What is the Regulated Entity's Number (RN)?           | RN106160260               |
| What is the name of the Regulated Entity (RE)?        | PONDER COMPRESSOR STATION |
| Does the RE site have a physical address?             | Yes                       |
| Physical Address                                      |                           |
| Number and Street                                     | 4045 FLORENCE RD          |
| City  | PONDER                    |
| State   | TX                        |
| ZIP   | 76259                     |
| County  | DENTON                    |
| Latitude (N) (##.#####)                               | 33.153783                 |
| Longitude (W) (-###.#####)                            | -97.259183                |
| Facility NAICS Code                                   |                           |
| What is the primary business of this entity?          | OIL & GAS PRODUCTION      |

### Customer (Applicant) Information

|  |                      |
|--|----------------------|
| How is this applicant associated with this site? | Owner Operator       |
| What is the applicant's Customer Number (CN)?    | CN604592279          |
| Type of Customer                                 | Corporation          |
| Full legal name of the applicant:                |                      |
| Legal Name                                       | SWG Pipeline, L.L.C. |
| Texas SOS Filing Number                          | 801898911            |
| Federal Tax ID                                   |                      |
| State Franchise Tax ID                           | 32052683698          |
| State Sales Tax ID                               |                      |

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

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

|  |                            |
|--|----------------------------|
| Organization Name  | SWG PIPELINE LLC           |
| Prefix   | MR                         |
| First  | TIMOTHY                    |
| Middle   |                            |
| Last   | PATTON COPELAND II         |
| Suffix   |                            |
| Credentials  |                            |
| Title  | DIRECTOR OF OPERATIONS     |
| Enter new address or copy one from list:                     |                            |
| Mailing Address  |                            |
| Address Type   | Domestic                   |
| Mailing Address (include Suite or Bldg. here, if applicable) | 415 PRIVATE ROAD 3502      |
| Routing (such as Mail Code, Dept., or Attn:)                 |                            |
| City   | BRIDGEPORT                 |
| State  | TX                         |
| ZIP  | 76426                      |
| Phone (###-###-####)   | 9406831121                 |
| Extension  |                            |
| Alternate Phone (###-###-####)                               |                            |
| Fax (###-###-####)   |                            |
| E-mail   | patton.copeland@enlink.com |

## Technical Contact

Person TCEQ should contact for questions about this application:

|  |  |
|--|--|
| Select existing TC contact or enter a new contact. | LANCE GREEN(SWG PIPELINE LL... )         |
| Organization Name                                  | SWG PIPELINE LLC                         |
| Prefix   | MR                                       |
| First  | LANCE                                    |
| Middle   |  |
| Last   | GREEN                                    |
| Suffix   |  |
| Credentials  |  |
| Title  | LEAD ENVIRONMENTAL PERMITTING SPECIALIST |
| Enter new address or copy one from list:           |  |
| Mailing Address                                    |  |
| Address Type                                       | Domestic                                 |

|  |                        |
|--|------------------------|
| Mailing Address (include Suite or Bldg. here, if applicable) | 60985 DERRICK RD       |
| Routing (such as Mail Code, Dept., or Attn:)                 |                        |
| City   | PLAQUEMINE             |
| State  | LA                     |
| ZIP  | 70764                  |
| Phone (###-###-####)   | 2256926947             |
| Extension  |                        |
| Alternate Phone (###-###-####)                               |                        |
| Fax (###-###-####)   |                        |
| E-mail   | lance.green@enlink.com |

## Title V General Information - Existing

|  |                      |
|--|----------------------|
| 1) Permit Type:  | SOP                  |
| 2) Permit Latitude Coordinate:   | 33 Deg 9 Min 21 Sec  |
| 3) Permit Longitude Coordinate:  | 97 Deg 15 Min 28 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.                     | 4537-37508           |
| 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=261803>OP-2 - 4.24.pdf</a> |
| Hash      | AC1ED0138523D20EFF9E2507191F7B9E681DF0F5E23288B99EFAFAC907D52C1B       |
| MIME-Type | application/pdf  |

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

|           |   |
|-----------|---|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=261805>OP-REQ3 - 4.16.pdf</a> |
| Hash      | 1A7E5BB29F5AA43E46F258C0BD1A637C1B026720BAE37266CCA34D0B818AF35F          |
| MIME-Type | application/pdf   |

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=261804>OP-PBRSUP - 4.16.pdf</a>  
Hash 632107ED6F61BA27517FFF2088C1D303B294BC7B43481E10A0230694C4E2548F  
MIME-Type application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=261807>OP-UA12 - Tables 19b 20b - 4.16.pdf</a>  
Hash 89029070364F4010EE0EEFAE833B1EB3C9F387887669F5DB7C384AFEDD09E6B4  
MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=261806>OP-UA2 - 4.16.pdf</a>  
Hash 3915B45B5C33AF36BA70AAE847B2DDFFA583FBE520ADC5EA72C8564E45E1B53  
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.

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 Timothy P Copeland II, the owner of the STEERS account ER099507.
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 4537.



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: Timothy P Copeland II OWNER OPERATOR

|                                      |  |
|--------------------------------------|--|
| Account Number:                      | ER099507   |
| Signature IP Address:                | 174.47.165.2   |
| Signature Date:                      | 2025-06-06   |
| Signature Hash:                      | C0C1C9D100E9B9FFA8AA12976FF706B8E260803CE94F45DDABCFA1970BE46ACE |
| Form Hash Code at time of Signature: | 9D8698D45B06C643AC1AFE32F0A17D35D9F4513E3933A43F578EB1A133D13BDE |

Submission

|                      |  |
|----------------------|--|
| Reference Number:    | The application reference number is 791342                         |
| Submitted by:        | The application was submitted by<br>ER099507/Timothy P Copeland II |
| Submitted Timestamp: | The application was submitted on 2025-06-06<br>at 14:14:44 CDT     |
| Submitted From:      | The application was submitted from IP address<br>174.47.165.2      |
| Confirmation Number: | The confirmation number is 657570                                  |
| Steers Version:      | The STEERS version is 6.91   |
| Permit Number:       | The permit number is 4537  |

Additional Information

Application Creator: This account was created by Kayla N Curtis

**From:** Samantha Mendez  
**Sent:** Wednesday, June 4, 2025 11:55 AM  
**To:** Kayla Curtis  
**Cc:** Jeff Jackson; Aucoin, Benjamin; Huerta, Gabe; Green, Lance; Mark Meyer  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good morning,

I have finished with my technical review for this project. Please submit all updated forms to STEERS for certification by **June 11, 2025**.

If you have any questions or concerns, please do not hesitate to contact me!

Sincerely,  
Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Friday, May 30, 2025 5:06 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Aucoin, Benjamin <[Benjamin.Aucoin@oneok.com](mailto:Benjamin.Aucoin@oneok.com)>; Huerta, Gabe <[Gabe.Huerta@oneok.com](mailto:Gabe.Huerta@oneok.com)>; Green, Lance <[Lance.Green@oneok.com](mailto:Lance.Green@oneok.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

Apologies on the delay -

Please see the Ponder WDP with comments attached for your review.  
Let us know if there are any additional comments or questions.

Thank you and have a great weekend!

**Kayla Curtis**

Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Monday, May 19, 2025 11:05 AM

**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Aucoin, Benjamin <[Benjamin.Aucoin@oneok.com](mailto:Benjamin.Aucoin@oneok.com)>; Huerta, Gabe <[Gabe.Huerta@oneok.com](mailto:Gabe.Huerta@oneok.com)>; Green, Lance <[Lance.Green@oneok.com](mailto:Lance.Green@oneok.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good morning,

I hope this email finds you well.

I wanted to reach out to confirm if you had any comments on the Working Draft Permit that was sent out last month on April 10, 2025.

Please let me know if you have any questions or concerns!

Sincerely,

Samantha Mendez

Environmental Permit Specialist

Air Permits Division, Office of Air

(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Sent:** Friday, April 25, 2025 4:25 PM

**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Aucoin, Benjamin <[Benjamin.Aucoin@oneok.com](mailto:Benjamin.Aucoin@oneok.com)>; Huerta, Gabe <[Gabe.Huerta@oneok.com](mailto:Gabe.Huerta@oneok.com)>; Green, Lance <[Lance.Green@oneok.com](mailto:Lance.Green@oneok.com)>  
**Subject:** RE: (External) RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

Please see the following updated forms associated with the addition of EE-09 and RECIP-09 at Ponder:

- OP-2
  - o Table 2 – Update from PBR to NRSP Authorization
- OP-SUMR
  - o Table 1 – Update from PBR to NRSP Authorization
- OP-PBR SUP
  - o PBR authorization was voided upon issuance of the NRSP
- OP-UA2
  - o Tables 1 – 4: EE-09 (30 TAC 117, MACT ZZZZ)
- OP-UA12
  - o Tables 19b, 20b: RECIP-09 (pre-dates applicability)
- OP-REQ3

Regarding the requested OP-MON for EH-02:

- EH-02 is not subject to CAM requirements as the unit does not meet all three (3) general applicability criteria as outlined in 30 TAC 122.604(b)(1-3).

Please let us know if there are any additional comments or questions!

Once the technical review is complete, we will prepare all updated forms in STEERS for certification.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Thursday, April 10, 2025 1:06 PM

**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon,

I sincerely apologize for attaching the wrong WDP to my previous email. I have ensured to attach the correct WDP for the Ponder Compressor Station to this email!

Thank you for your cooperation and understanding! I look forward to reviewing the updates accordingly after April 25, 2025.

If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Sent:** Thursday, April 10, 2025 12:14 PM

**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Friday, April 4, 2025 11:55 AM  
**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.

- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
  - d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.
- If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Samantha Mendez

**Sent:** Monday, February 3, 2025 2:18 PM

**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_fac](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_fac)

[tsheet.pdf](#). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Friday, May 30, 2025 5:06 PM  
**To:** Samantha Mendez  
**Cc:** Jeff Jackson; Aucoin, Benjamin; Huerta, Gabe; Green, Lance; Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** Ponder - WDP - 4.10.docx  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good afternoon, Samantha!

Apologies on the delay -

Please see the Ponder WDP with comments attached for your review.  
Let us know if there are any additional comments or questions.

Thank you and have a great weekend!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <Samantha.Mendez@tceq.texas.gov>  
**Sent:** Monday, May 19, 2025 11:05 AM  
**To:** Kayla Curtis <kc@resolutecompliance.com>  
**Cc:** Jeff Jackson <jj@resolutecompliance.com>; Aucoin, Benjamin <Benjamin.Aucoin@oneok.com>; Huerta, Gabe <Gabe.Huerta@oneok.com>; Green, Lance <Lance.Green@oneok.com>; Rhyan Stone <Rhyan.Stone@tceq.texas.gov>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good morning,

I hope this email finds you well.

I wanted to reach out to confirm if you had any comments on the Working Draft Permit that was sent out last month on April 10, 2025.

Please let me know if you have any questions or concerns!

Sincerely,  
Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Friday, April 25, 2025 4:25 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Aucoin, Benjamin <[Benjamin.Aucoin@oneok.com](mailto:Benjamin.Aucoin@oneok.com)>; Huerta, Gabe <[Gabe.Huerta@oneok.com](mailto:Gabe.Huerta@oneok.com)>; Green, Lance <[Lance.Green@oneok.com](mailto:Lance.Green@oneok.com)>  
**Subject:** RE: (External) RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

Please see the following updated forms associated with the addition of EE-09 and RECIP-09 at Ponder:

- OP-2
  - o Table 2 – Update from PBR to NRSP Authorization
- OP-SUMR
  - o Table 1 – Update from PBR to NRSP Authorization
- OP-PBRSUP
  - o PBR authorization was voided upon issuance of the NRSP
- OP-UA2
  - o Tables 1 – 4: EE-09 (30 TAC 117, MACT ZZZZ)
- OP-UA12
  - o Tables 19b, 20b: RECIP-09 (pre-dates applicability)
- OP-REQ3

Regarding the requested OP-MON for EH-02:

- EH-02 is not subject to CAM requirements as the unit does not meet all three (3) general applicability criteria as outlined in 30 TAC 122.604(b)(1-3).

Please let us know if there are any additional comments or questions!  
Once the technical review is complete, we will prepare all updated forms in STEERS for certification.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Thursday, April 10, 2025 1:06 PM  
**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon,

I sincerely apologize for attaching the wrong WDP to my previous email. I have ensured to attach the correct WDP for the Ponder Compressor Station to this email!

Thank you for your cooperation and understanding! I look forward to reviewing the updates accordingly after April 25, 2025.

If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Thursday, April 10, 2025 12:14 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance

 **RESOLUTE**  
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Office: 903.707.8632  
Cell: 817.821.6526  
Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Friday, April 4, 2025 11:55 AM  
**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.

- Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**



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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_fac\\_tsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_fac_tsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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Revised- Draft Page i

## Table of Contents

| Section   | Page |
|---|------|
| General Terms and Conditions .....  | 1    |
| Special Terms and Conditions: .....   | 1    |
| Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping<br>and Reporting..... | 1    |
| New Source Review Authorization Requirements .....  | 6    |
| Compliance Requirements.....  | 6    |
| Permit Location .....   | 8    |
| Attachments .....   | 9    |
| Applicable Requirements Summary.....  | 10   |
| New Source Review Authorization References .....  | 25   |
| Appendix A.....   | 28   |
| Acronym List .....  | 29   |

## **General Terms and Conditions**

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

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

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

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

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

## **Special Terms and Conditions:**

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

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

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

- F. For the purpose of generating emission reduction credits through 30 TAC Chapter 101, Subchapter H, Division 1 (Emission Credit Banking and Trading), the permit holder shall comply with the following requirements:
- (i) Title 30 TAC § 101.302 (relating to General Provisions)
  - (ii) Title 30 TAC § 101.303 (relating to Emission Reduction Credit Generation Certification)
  - (iii) Title 30 TAC § 101.304 (relating to Mobile Emission Reduction Credit Generation and Certification)
  - (iv) Title 30 TAC § 101.309 (relating to Emission Credit Banking and Trading)
  - (v) The terms and conditions by which the emission limits are established to generate the reduction credit are applicable requirements of this permit

2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):

- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
- B. Title 30 TAC § 101.3 (relating to Circumvention)
- C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
- D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
- E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
- F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
- G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
- H. Title 30 TAC § 101.221 (relating to Operational Requirements)
- I. Title 30 TAC § 101.222 (relating to Demonstrations)
- J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)

3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:

- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit

holder shall comply with the following requirements for stationary vents at the site subject to this standard:

- (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(1)(E)
- (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
- (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:
  - (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
  - (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
  - (3) Records of all observations shall be maintained.
  - (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet



prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(5) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

B. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.

C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).

D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:

- (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
- (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
- (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

4. The permit holder shall comply with the following requirements of 30 TAC Chapter 117:

- A. For stationary reciprocating engines subject to Subchapter D, Division 2 at minor sources of NO<sub>x</sub>:
  - (i) Title 30 TAC § 117.2110(a) - (e) (relating to Emission Specifications)
  - (ii) Title 30 TAC § 117.2130 (relating to Operating Requirements)
  - (iii) Title 30 TAC § 117.2135 (relating to Monitoring and Testing Requirements)
  - (iv) Title 30 TAC § 117.2145 (relating to Recordkeeping and Reporting Requirements)
  - (v) Title 30 TAC § 117.9210 (relating to Compliance Schedule)
- 5. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
  - B. Title 40 CFR § 60.8 (relating to Performance Tests)
  - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 6. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
- 7. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
  - A. Title 40 CFR § 63.760(a)(1)(i) - (iii) (relating to Applicability and Designation of Affected Source)
- 8. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

### **New Source Review Authorization Requirements**

9. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated January 25, 2024 in the application for project 35900), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
10. 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.
11. 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).

### **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).

- C. The permit holder shall comply with the requirements of 30 TAC § 117.452 for Final Control Plan Procedures for Reasonably Available Control Technology (RACT) and 30 TAC § 117.456 for Revision of Final Control Plan.
  - D. The permit holder shall comply with the requirements of 30 TAC § 117.454 for Final Control Plan Procedures for Attainment Demonstration Emission Specifications and 30 TAC § 117.456 for Revision of Final Control Plan.
  - E. The permit holder shall comply with the requirement in 30 TAC § 117.450(b) for identification of exempt units in the Initial Control Plan.
14. Use of Emission Credits to comply with applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) Offsets for Title 30 TAC Chapter 116
  - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)-(d)
    - (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
    - (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)-(d)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
    - (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)
15. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) If applicable, offsets for Title 30 TAC Chapter 116
    - (iv) Temporarily exceed state NSR permit allowables

B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:

- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
- (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
- (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
- (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
- (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

**Permit Location**

16. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit at Bridgeport Gas Plant - 415 Private Road 3502, Bridgeport, Texas 76426.

**Attachments**

**Applicable Requirements Summary**

**New Source Review Authorization References**

**Applicable Requirements Summary**

**Unit Summary..... 11**

**Applicable Requirements Summary ..... 13**

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

### Unit Summary

**Commented [KC1]:** Add EE-09 in Unit Summary; R117-1, 63-ZZZZ2. See updated OP-UA2 and OP-REQ3 provided on 4/25.

| Unit/Group/<br>Process ID No. | Unit Type                   | Group/Inclusive<br>Units | SOP Index No. | Regulation                          | Requirement Driver      |
|-------------------------------|-----------------------------|--------------------------|---------------|-------------------------------------|-------------------------|
| DEHY-01                       | GLYCOL DEHYDRATION          | N/A                      | 63HH-1        | 40 CFR Part 63, Subpart HH          | No changing attributes. |
| EE-01A                        | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-01A                        | SRIC ENGINES                | N/A                      | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EH-02                         | PROCESS<br>HEATERS/FURNACES | N/A                      | R117-3        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| RECIP-05A                     | FUGITIVE EMISSION<br>UNITS  | N/A                      | 60OOOOa-2     | 40 CFR Part 60, Subpart<br>OOOOa    | No changing attributes. |



Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type                  | Group/Inclusive<br>Units | SOP Index No. | Regulation                      | Requirement Driver      |
|-------------------------------|----------------------------|--------------------------|---------------|---------------------------------|-------------------------|
| RECIP-08                      | FUGITIVE EMISSION<br>UNITS | N/A                      | 600000-3      | 40 CFR Part 60, Subpart<br>0000 | No changing attributes. |

**Commented [KC1]:** Add EE-09 in Unit Summary; R117-1, 63-ZZZZ2. See updated OP-UA2 and OP-REQ3 provided on 4/25.

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant       | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements   | Recordkeeping Requirements (30 TAC § 122.144)  | Reporting Requirements (30 TAC § 122.145)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
| DEHY-01                   | EU                      | 63HH-1        | 112(B) HAPS     | 40 CFR Part 63, Subpart HH            | § 63.764(e)(1)(ii)<br>§ 63.764(a)<br>§ 63.764(e)(1)<br>§ 63.764(j)<br>§ 63.775(c)(8)  | The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.  | [G]§ 63.772(b)(2)   | § 63.774(d)(1)<br>§ 63.774(d)(1)(ii)   | None  |
| EE-01A                    | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-01A                    | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(I)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)   | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)  | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010  |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-------------|---------------------------------------|--|--|--|---|--|
|                           |                         |               |             |                                       | § 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j)           | on or after June 1, 2007 fired on other than landfill gas, NOx emissions in excess of 0.50 g/hp-hr.  | § 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b)  |   | [G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7)  |
| EE-01A                    | EU                      | 63ZZZZ-1      | 112(B) HAPS | 40 CFR Part 63, Subpart ZZZZ          | § 63.6603(a)-Table 2d.9<br>§ 63.6595(a)(1)<br>§ 63.6605(a)<br>§ 63.6605(b)<br>§ 63.6625(h)<br>§ 63.6640(a)-Table 6.14.a.iii<br>§ 63.6640(b)<br>§ 63.6640(c)(7) | For each existing non-emergency, non-black start 4SLB stationary RICE with a site rating greater than 500 HP that is not a remote stationary RICE and that operates more than 24 hours per calendar year, you must install an oxidation catalyst to reduce HAP emissions from the stationary RICE. | § 63.6612(a)<br>[G]§ 63.6612(b)<br>§ 63.6620(a)<br>§ 63.6620(a)-Table 4.3.a.i<br>§ 63.6620(a)-Table 4.3.a.ii<br>§ 63.6620(a)-Table 4.3.a.iii<br>§ 63.6620(a)-Table 4.3.a.v<br>§ 63.6620(b)<br>§ 63.6620(d)<br>[G]§ 63.6620(e)(2)<br>§ 63.6630(a)-Table 5.13.a.i<br>§ 63.6630(a)-Table 5.13.a.ii<br>§ 63.6630(e)<br>§ 63.6630(e)(1)<br>§ 63.6630(e)(2)<br>§ 63.6630(e)(3) | § 63.6635(a)<br>§ 63.6635(c)<br>§ 63.6655(a)<br>§ 63.6655(a)(1)<br>§ 63.6655(a)(2)<br>§ 63.6655(a)(3)<br>§ 63.6655(a)(4)<br>§ 63.6655(a)(5)<br>§ 63.6655(d)<br>§ 63.6655(e)<br>§ 63.6660(a)<br>§ 63.6660(b)<br>§ 63.6660(c) | § 63.6640(b)<br>§ 63.6640(e)<br>§ 63.6645(a)<br>§ 63.6645(g)<br>§ 63.6645(h)<br>§ 63.6650(a)<br>§ 63.6650(a)-Table 7.3<br>§ 63.6650(b)<br>§ 63.6650(b)(1)<br>§ 63.6650(b)(2)<br>§ 63.6650(b)(3)<br>§ 63.6650(b)(4)<br>[G]§ 63.6650(c)<br>[G]§ 63.6650(d)<br>§ 63.6650(f) |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
|                           |                         |               |                 |                                       |   |   | § 63.6630(e)(5)<br>§ 63.6635(a)<br>§ 63.6635(b)<br>§ 63.6640(a)<br>§ 63.6640(a)-Table 6.14.a.i<br>§ 63.6640(a)-Table 6.14.a.iii<br>§ 63.6640(b)<br>§ 63.6640(c)<br>§ 63.6640(c)(1)<br>§ 63.6640(c)(2)<br>§ 63.6640(c)(3)<br>§ 63.6640(c)(5)<br>§ 63.6640(c)(7)  |  |   |
| EE-05A                    | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-05A                    | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(I)   | No person shall allow the discharge from gas-fired lean-burn engines placed   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)  | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)  | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)   |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|--|--|---|---|--|
|                           |                         |               |                 |                                       | § 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j) | into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill gas, NOx emissions in excess of 0.50 g/hp-hr.  | § 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | [G]§ 117.445(f)(3)<br>§ 117.445(f)(8)   | [G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-05A                    | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)  | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-05A                    | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)  | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-------------|---------------------------------------|---|--|---|--|--|
|                           |                         |               |             |                                       |   | comply with a NOx emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.   |   |  |  |
| EE-05A                    | EU                      | 60JJJJ-2      | VOC         | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-05A                    | EU                      | 63ZZZZ-2      | 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   |
| EE-07                     | EU                      | R117-1        | CO          | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)           | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O2, dry basis from any unit  | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)                                      | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8)   | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1) |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)   | subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b)   |  | § 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7)   |
| EE-07                     | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j) | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill gas, NO <sub>x</sub> emissions in excess of 0.50 g/hp-hr.        | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-07                     | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1   | Owners and operators of stationary non-emergency   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)   | [G]§ 60.4245(c)<br>§ 60.4245(d)   |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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) |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|--|---|--|---|---|
|                           |                         |               |                 |                                       | § 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4243(g)                         | natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart.   | § 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)   | § 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4)   |   |
| EE-07                     | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a NO <sub>x</sub> emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)                 | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| EE-07                     | EU                      | 60JJJJ-2      | VOC             | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.             | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| EE-07                     | EU                      | 63ZZZZ-2      | 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   | None   | None  | None                                      |



### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
|                           |                         |               |                 |                                       |   | 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.  |   |  |   |
| EE-08                     | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-08                     | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(I)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)                          | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)   | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)   |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|--|---|--|
|                           |                         |               |                 |                                       | § 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j)                 | gas, NOx emissions in excess of 0.50 g/hp-hr.   | § 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) |   | § 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-08                     | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-08                     | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NOx emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-08                     | EU                      | 60JJJJ-2      | VOC             | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234   | Owners and operators of stationary non-emergency natural gas engines with a   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)  | [G]§ 60.4245(c)<br>§ 60.4245(d)  |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4243(g) | maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g)   | § 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) |  |
| EE-08                     | EU                      | 63ZZZZ-2      | 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   |
| EH-02                     | EU                      | R117-3        | CO          | 30 TAC Chapter 117, Subchapter B      | § 117.410(c)(1)<br>§ 117.410(c)(1)(B)<br>§ 117.410(c)(3)<br>§ 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)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>§ 117.445(f)(8)    | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|--|--|--|--|
| EH-02                     | EU                      | R117-3        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(3)(B)<br>§ 117.410(a)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.440(j)                                     | No person shall allow the discharge from process heaters with a maximum rated capacity less than 40 MMBtu/hr, NO <sub>x</sub> emissions in excess of 0.036 lb/MMBtu (or alternatively, 30 ppmv, at 3.0% oxygen, dry basis).  | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| RECIP-05A                 | EU                      | 600000a-2     | VOC             | 40 CFR Part 60, Subpart OOOOa         | § 60.5385a(a)(1)<br>§ 60.5370a(a)<br>§ 60.5370a(b)<br>§ 60.5385a<br>§ 60.5385a(a)<br>§ 60.5385a(b)<br>§ 60.5385a(c)<br>§ 60.5385a(d)<br>§ 60.5410a<br>§ 60.5415a(c)<br>§ 60.5415a(c)(2)<br>§ 60.5415a(c)(3) | For each reciprocating compressor, the owner or operator must replace the rod packing on or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, August 2, 2016, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later. | § 60.5410a(c)(1)<br>§ 60.5415a(c)(1)   | § 60.5410a(c)(4)<br>§ 60.5420a(c)<br>[G]§ 60.5420a(c)(3)           | § 60.5410a(c)(3)<br>§ 60.5420a(a)<br>§ 60.5420a(a)(1)<br>§ 60.5420a(b)<br>[G]§ 60.5420a(b)(1)<br>§ 60.5420a(b)(11)<br>[G]§ 60.5420a(b)(13)<br>[G]§ 60.5420a(b)(14)<br>[G]§ 60.5420a(b)(4)  |
| RECIP-08                  | EU                      | 600000-3      | VOC             | 40 CFR Part 60, Subpart OOOO          | § 60.5385(a)(1)<br>§ 60.5370(b)<br>§ 60.5385(a)<br>§ 60.5415(c)(3)<br>§ 60.5420(a)(1)   | Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial  | § 60.5410(c)(1)<br>§ 60.5415(c)(1)   | § 60.5420(c)<br>[G]§ 60.5420(c)(3)                                 | § 60.5420(a)<br>§ 60.5420(a)(1)<br>§ 60.5420(b)<br>[G]§ 60.5420(b)(1)<br>[G]§ 60.5420(b)(4)<br>§ 60.5420(b)(7)(i)  |

Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements | Recordkeeping Requirements (30 TAC § 122.144) | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|-------------------------------------|---|---|
|                           |                         |               |           |                                       |   | startup of your reciprocating compressor affected facility, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later. |                                     |   |   |

Commented [KC2]: Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

**New Source Review Authorization References**

**New Source Review Authorization References ..... 26**

**New Source Review Authorization References by Emission Unit ..... 27**

#### **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.

| <b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b> |                              |
|--|------------------------------|
| Number: 106.352  | Version No./Date: 11/22/2012 |
| Number: 106.512  | Version No./Date: 06/13/2001 |

**Commented [KC3]:** Facility currently authorized under Non-Rule Standard Permit; Authorization Number: 179828, Issuance Date: 4/25/2025

**Commented [KC4]:** Both below PBRs (106.352, 106.512) were voided on 4/25/2025.

#### **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** |
|---------------------------|--------------------------------|-----------------------------------|
| DEHY-01                   | TEG DEHYDRATOR 1               | 106.352/11/22/2012 [96573]        |
| EE-01A                    | COMPRESSOR ENGINE 1            | 106.352/11/22/2012 [96573]        |
| EE-05A                    | COMPRESSOR ENGINE 2            | 106.352/11/22/2012 [96573]        |
| EE-07                     | COMPRESSOR ENGINE 3            | 106.352/11/22/2012 [96573]        |
| EE-08                     | COMPRESSOR ENGINE 8            | 106.512/06/13/2001 [96573]        |
| EH-02                     | AMINE REBOILER                 | 106.352/11/22/2012 [96573]        |
| RECIP-05A                 | RECIPROCATING COMPRESSOR 2     | 106.352/11/22/2012 [96573]        |
| RECIP-08                  | RECIPROCATING COMPRESSOR 8     | 106.352/11/22/2012 [96573]        |

\*\*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.

**Commented [KC5]:** Add EE-09; Compressor Engine 9

**Commented [KC6]:** Update NSR Authorization column to 179828 for all sources.



**Appendix A**

**Acronym List ..... 29**

## Acronym List

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

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

**From:** Samantha Mendez  
**Sent:** Monday, May 19, 2025 11:05 AM  
**To:** Kayla Curtis  
**Cc:** Jeff Jackson; Aucoin, Benjamin; Huerta, Gabe; Green, Lance; Rhyen Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good morning,

I hope this email finds you well.

I wanted to reach out to confirm if you had any comments on the Working Draft Permit that was sent out last month on April 10, 2025.

Please let me know if you have any questions or concerns!

Sincerely,  
Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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[www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Friday, April 25, 2025 4:25 PM  
**To:** Samantha Mendez <Samantha.Mendez@tceq.texas.gov>  
**Cc:** Jeff Jackson <jj@resolutecompliance.com>; Aucoin, Benjamin <Benjamin.Aucoin@oneok.com>; Huerta, Gabe <Gabe.Huerta@oneok.com>; Green, Lance <Lance.Green@oneok.com>  
**Subject:** RE: (External) RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

Please see the following updated forms associated with the addition of EE-09 and RECIP-09 at Ponder:

- OP-2
  - o Table 2 – Update from PBR to NRSP Authorization
- OP-SUMR
  - o Table 1 – Update from PBR to NRSP Authorization

- OP-PBRSUP
  - o PBR authorization was voided upon issuance of the NRSP
- OP-UA2
  - o Tables 1 – 4: EE-09 (30 TAC 117, MACT ZZZZ)
- OP-UA12
  - o Tables 19b, 20b: RECIP-09 (pre-dates applicability)
- OP-REQ3

Regarding the requested OP-MON for EH-02:

- EH-02 is not subject to CAM requirements as the unit does not meet all three (3) general applicability criteria as outlined in 30 TAC 122.604(b)(1-3).

Please let us know if there are any additional comments or questions!

Once the technical review is complete, we will prepare all updated forms in STEERS for certification.

Thank you!

**Kayla Curtis**

**Manager, Environmental Compliance**



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Thursday, April 10, 2025 1:06 PM

**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon,

I sincerely apologize for attaching the wrong WDP to my previous email. I have ensured to attach the correct WDP for the Ponder Compressor Station to this email!

Thank you for your cooperation and understanding! I look forward to reviewing the updates accordingly after April 25, 2025.

If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Thursday, April 10, 2025 12:14 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Friday, April 4, 2025 11:55 AM

**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic

copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,



I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Friday, April 25, 2025 4:25 PM  
**To:** Samantha Mendez  
**Cc:** Jeff Jackson; Aucoin, Benjamin; Huerta, Gabe; Green, Lance  
**Subject:** RE: (External) RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** OP-2 - 4.24.pdf; OP-SUMR - Table 1 - 4.16.pdf; OP-PBRSUP - 4.16.pdf; OP-UA2 - 4.16.pdf; OP-UA12 - Tables 19b, 20b - 4.16.pdf; OP-REQ3 - 4.16.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good afternoon, Samantha!

Please see the following updated forms associated with the addition of EE-09 and RECIP-09 at Ponder:

- OP-2
  - o Table 2 – Update from PBR to NRSP Authorization
- OP-SUMR
  - o Table 1 – Update from PBR to NRSP Authorization
- OP-PBRSUP
  - o PBR authorization was voided upon issuance of the NRSP
- OP-UA2
  - o Tables 1 – 4: EE-09 (30 TAC 117, MACT ZZZZ)
- OP-UA12
  - o Tables 19b, 20b: RECIP-09 (pre-dates applicability)
- OP-REQ3

Regarding the requested OP-MON for EH-02:

- EH-02 is not subject to CAM requirements as the unit does not meet all three (3) general applicability criteria as outlined in 30 TAC 122.604(b)(1-3).

Please let us know if there are any additional comments or questions!

Once the technical review is complete, we will prepare all updated forms in STEERS for certification.

Thank you!

**Kayla Curtis**  
**Manager, Environmental Compliance**



Cell: 817.821.6526  
Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Thursday, April 10, 2025 1:06 PM  
**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon,

I sincerely apologize for attaching the wrong WDP to my previous email. I have ensured to attach the correct WDP for the Ponder Compressor Station to this email!

Thank you for your cooperation and understanding! I look forward to reviewing the updates accordingly after April 25, 2025.

If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Thursday, April 10, 2025 12:14 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Friday, April 4, 2025 11:55 AM

**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Samantha Mendez

**Sent:** Monday, February 3, 2025 2:18 PM

**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.



**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_fac\\_tsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_fac_tsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------|-----------------------------|------------------------------------|-----------------|------------|-------------|-----------------------------|------------------|
| EE-01a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-05a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-07       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-08       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-09       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------------------------|-------------|--------------------------|---------------------|----------------------------------|---------------------------|-----------------------------------|
| EE-01a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-05a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-07       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-08       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-09       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|----------------------|------------------------|---------------------|----------------------|-------------------------------------|----------------------------|
| EE-01a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-05a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-07       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-08       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-09       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | HAP Source | Brake HP | Construction/<br>Reconstruction<br>Date | Nonindustrial<br>Emergency<br>Engine | Service Type | Stationary RICE<br>Type |
|-------------|-------------------|------------|----------|---|--------------------------------------|--------------|-------------------------|
| EE-08       | 63ZZZZ-2          | AREA       | 500+     | 06+                                     |                                      |              |                         |
| EE-09       | 63ZZZZ-1          | AREA       | 500+     | 02-06                                   | NO                                   | NORMAL       | 4SLB                    |
|             |                   |            |          |   |                                      |              |                         |
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**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 5)**

**Federal Operating Permit Program**

**Table 2b: 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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Manufacture Date | Operating Hours | Different Schedule | Emission Limitation | Displacement |
|-------------|-------------------|------------------|-----------------|--------------------|---------------------|--------------|
| EE-09       | 63ZZZZ-1          |                  | NO              | NO                 | LIMCO               |              |
|             |                   |                  |                 |                    |                     |              |
|             |                   |                  |                 |                    |                     |              |
|             |                   |                  |                 |                    |                     |              |
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**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 6)**

**Federal Operating Permit Program**

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

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary 32B Reciprocating Internal Combustion Engines  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Crankcase | Performance Test | Control Technique | Operating Limits | Monitoring System |
|-------------|-------------------|-----------|------------------|-------------------|------------------|-------------------|
| EE-09       | 63ZZZZ-1          |           | YES              | OXCAT             |                  | SHUT1             |
|             |                   |           |                  |                   |                  |                   |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Construction/<br>Reconstruction/<br>Modification Date | Test Cell | Exemption | Temp<br>Replacement | Horsepower | Fuel   | AEL<br>No. | Lean<br>Burn | Commencing |
|-------------|----------------------|---|-----------|-----------|---------------------|------------|--------|------------|--------------|------------|
| EE-08       | 60JJJJ-2             | YES   | NO        | NONE      | NO                  | 1350+      | NATGAS |            |              | CON        |
| EE-09       | 60JJJJ-1             | NO  |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Manufacture<br>Date | Displacement | Certified | Operation | Certified<br>Modification | Service | Severe Duty | Optional<br>Compliance |
|-------------|----------------------|---------------------|--------------|-----------|-----------|---------------------------|---------|-------------|------------------------|
| EE-08       | 60JJJJ-2             | N0710+              |              | NO        |           |                           | NON     |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
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**Fugitive Emission Unit Attributes**

**Form OP-UA12 (Page 170)**

**Federal Operating Permit Program**

**Table 19b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction**

**Commenced After September 18, 2015**

**Texas Commission on Environmental Quality**

| <b>Date</b> | <b>Permit No.</b> | <b>Regulated Entity No.</b> |
|-------------|-------------------|-----------------------------|
| 04/16/2025  | O4537             | RN106160260                 |

| <b>Unit ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Construction/Modification Date</b> | <b>Reciprocating Compressor</b> | <b>AMEL</b> | <b>Bypass Device</b> |
|--------------------|--------------------------|---------------------------------------|---------------------------------|-------------|----------------------|
| RECIP-08           | 60OOOOa-2                | 15-                                   |                                 |             |                      |
| RECIP-09           | 60OOOOa-3                | 15-                                   |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
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**Fugitive Emission Unit Attributes  
Form OP-UA12 (Page 186)  
Federal Operating Permit Program**

**Table 20b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction,  
Modification or Reconstruction Commenced After August 23, 2011 and on or before September 18, 2015  
Texas Commission on Environmental Quality**

| Date      | Permit No. | Regulated Entity No. |
|-----------|------------|----------------------|
| 4/16/2025 | O4537      | RN106160260          |

| Unit ID. No. | SOP/GOP Index No. | Construction/<br>Modification Date | Reciprocating Compressor | Bypass Device |
|--------------|-------------------|------------------------------------|--------------------------|---------------|
| RECIP-08     | 600000-3          | 11-15                              | RC26K-                   |               |
| RECIP-09     | 600000-4          | 11-                                |                          |               |
|              |                   |                                    |                          |               |
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|              |                   |                                    |                          |               |

**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID<br>No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations 30 TAC<br>Chapter 116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|------------------------|------------------------------------|--------------------------------|---------------------|--|---|
| A                  | 1                            | EE-08                  | OP-UA2                             | Compressor Engine 8            |                     | NRSP: 179828   |   |
| A                  | 2                            | RECIP-08               | OP-UA12                            | Reciprocating Compressor 8     |                     | NRSP: 179828   |   |
| A                  | 3                            | EE-01A                 | OP-UA2                             | Compressor Engine 1A           |                     | NRSP: 179828   |   |
| A                  | 4                            | EE-05A                 | OP-UA2                             | Compressor Engine 5A           |                     | NRSP: 179828   |   |
| A                  | 5                            | EE-07                  | OP-UA2                             | Compressor Engine 7            |                     | NRSP: 179828   |   |
| A                  | 6                            | EH-01                  | OP-UA5                             | Glycol Reboiler                |                     | NRSP: 179828   |   |
| A                  | 7                            | EH-02                  | OP-UA5                             | Amine Reboiler                 |                     | NRSP: 179828   |   |
| A                  | 8                            | EE-09                  | OP-UA2                             | Compressor Engine 9            |                     | NRSP: 179828   |   |
| A                  | 9                            | RECIP-09               | OP-UA12                            | Reciprocating Compressor 9     |                     | NRSP: 179828   |   |
|                    |                              |                        |                                    |                                |                     |  |   |

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

**Table 1a: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 04/16/2025                | <b>Regulated Entity No.:</b> RN106160260    | <b>Permit No.:</b> O4537 |
| <b>Company Name:</b> SWG Pipeline, LLC | <b>Area Name:</b> Ponder Compressor Station |                          |

| Revision No. | Unit/Group/Process ID No. | Unit/Group/Process Applicable Form | SOP/GOP Index No | Pollutant                 | Applicable Regulatory Requirement Name | Applicable Regulatory Requirement Standard(s)   |
|--------------|---------------------------|------------------------------------|------------------|---------------------------|--|---|
| 1            | EE-08                     | OP-UA2                             | 63ZZZZ-2         | HAPS                      | 40 CFR Part 63, Subpart ZZZZ           | §63.6590(c)   |
| 1            | EE-08                     | OP-UA2                             | 60JJJJ-2         | NO <sub>x</sub> , CO, VOC | 40 CFR Part 60, Subpart JJJJ           | §60.4233(e)-Table 1<br>§60.4234<br>§60.4243(b)(2)(ii), (e), (g)<br>§60.4246   |
| 1            | EE-08                     | OP-UA2                             | R117-1           | NO <sub>x</sub> , CO      | Chapter 117                            | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2), (c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3), (e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6), (b)(7)<br>§117.440(j) |
| 2            | RECIP-08                  | OP-UA12                            | 60OOOO-3         | VOC                       | 40 CFR Part 60, Subpart OOOO           | §60.5385(a)(1)<br>§60.5370(b)<br>§60.5385(a)<br>§60.5415(c)(3)-(4)<br>§60.5420(a)(1)  |

|   |        |        |        |         |             |  |
|---|--------|--------|--------|---------|-------------|--|
| 3 | EE-01A | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§ 117.410(c)(1)(B)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§ 117.440(j) |
| 4 | EE-05A | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§ 117.410(c)(1)(B)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§ 117.440(j) |
| 5 | EE-07  | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§ 117.410(c)(1)(B)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§ 117.440(j) |
| 6 | EH-01  | OP-UA5 | R117-2 | NOx, CO | Chapter 117 | None [§ 117.403(a)(1)(B)]  |
| 7 | EH-02  | OP-UA5 | R117-3 | NOx, CO | Chapter 117 | § 117.410(a)(3)(B)<br>§ 117.410(a), (b)(2), (c)(1)<br>§ 117.410(c)(1)(A)-(B), (c)(3)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(2)-(3), (b)(4)-(5)<br>§ 117.440(j)                                 |

|   |       |        |          |         |                                 |  |
|---|-------|--------|----------|---------|---------------------------------|--|
| 8 | EE-09 | OP-UA2 | 63ZZZZ-2 | HAPS    | 40 CFR Part 63, Subpart<br>ZZZZ | §63.6603(a)-Table 2d.9<br>§63.6595(a)(1)<br>§63.6605(a), (b)<br>§63.6625(h), (j)<br>§63.6640(a)-Table 6.14.a.iii<br>§63.6640(b), (c)(7)  |
| 8 | EE-09 | OP-UA2 | R117-1   | NOx, CO | Chapter 117                     | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§117.440(j) |
|   |       |        |          |         |                                 |  |

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

**Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date: 04/16/2025</b>                | <b>Regulated Entity No.: RN106160260</b>    | <b>Permit No.: O4537</b> |
| <b>Company Name: SWG Pipeline, LLC</b> | <b>Area Name: Ponder Compressor Station</b> |                          |

| <b>Revision No.</b> | <b>Unit/Group/ Process ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Pollutant</b>          | <b>Monitoring and Testing Requirements</b>           | <b>Recordkeeping Requirements</b>                       | <b>Reporting Requirements</b>      |
|---------------------|-----------------------------------|--------------------------|---------------------------|--|---|------------------------------------|
| 1                   | EE-08                             | 63ZZZZ-2                 | HAPS                      | None   | None  | None                               |
| 1                   | EE-08                             | 60JJJJ-2                 | NO <sub>x</sub> , CO, VOC | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4244(a)-(d) | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4245(a)(1)-(4) | [G]§60.4245(c), (d)<br>§60.4245(d) |



|   |          |          |         |   |   |   |
|---|----------|----------|---------|---|---|---|
| 1 | EE-08    | R117-1   | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
| 2 | RECIP-08 | 600000-3 | VOC     | §60.5410(c)(1)<br>§60.5415(c)(1)  | §60.5420(c), [G](c)(3)  | §60.5420(b), [G](b)(1),<br>[G](b)(4)  |

|   |        |        |         |   |   |   |
|---|--------|--------|---------|---|---|---|
| 3 | EE-01A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|--------|--------|---------|---|---|---|

|   |        |        |         |   |   |   |
|---|--------|--------|---------|---|---|---|
| 4 | EE-05A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|--------|--------|---------|---|---|---|

|   |       |        |         |   |   |   |
|---|-------|--------|---------|---|---|---|
| 5 | EE-07 | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
| 6 | EH-01 | R117-2 | NOx, CO | None  | None  | None  |

|   |       |          |                      |   |  |   |
|---|-------|----------|----------------------|---|--|---|
| 7 | EH-02 | R117-3   | NO <sub>x</sub> , CO | §117.435(a)(1), (a)(3), (b)-(e), (e)(3)<br>§117.440(a), (f), [G](g), (k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3)<br>§117.8000(c)(5)-(6), [G](d)<br>§117.8100(a), (a)(1), (a)(1)(A), (a)(1)(B)<br>§117.8100(a)(1)(B)(ii), (a)(1)(B)(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4), (a)(5)<br>§117.8100(a)(5)(A), (a)(5)(B), [G](a)(5)(D)<br>[G]§117.8100(a)(5)(E), (a)(6), (b), (b)(1)<br>[G]§117.8100(b)(1)(A), (b)(1)(B), (b)(2), (b)(3)<br>§117.8100(b)(3)(A), (b)(3)(B), (b)(4), (b)(4)(A)<br>§117.8100(b)(4)(A)(i)(II), (b)(4)(A)(i)(III)<br>[G]§117.8100(b)(4)(B), (b)(4)(C), (b)(4)(C)(i)<br>§117.8100(b)(4)(C)(ii), (b)(4)(C)(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-)<br>§117.8100(b)(5), (b)(6) | §117.445(a), (f), (f)(1),<br>[G](f)(2), (f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
| 8 | EE-09 | 63ZZZZ-2 | HAPS                 | §63.6625(j)<br>§63.6640(a)<br>§63.6640(a)-Table 6.9.a.i-ii  | §63.6603(f)<br>§63.6625(j)<br>§63.6655(e)<br>§63.6660(a)-(c)                 | §63.6640(e)<br>§63.6650(f)  |

|   |       |        |         |   |   |   |
|---|-------|--------|---------|---|---|---|
| 8 | EE-09 | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|   |       |        |         |   |   |   |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/16/2025 | O4537         | RN106160260             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| N/A         |                  |         |                   |
|             |                  |         |                   |
|             |                  |         |                   |
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**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 |
|------------|---------------|-------------------------|
| 04/16/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| N/A         |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
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**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 |
|------------|---------------|-------------------------|
| 04/16/2024 | O4537         | RN106160260             |

| PBR No. | Version No./Date |
|---------|------------------|
| N/A     |                  |
|         |                  |
|         |                  |
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|         |                  |
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|         |                  |
|         |                  |
|         |                  |

**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 |
|------------|---------------|-------------------------|
| 04/16/2025 | O4537         | RN106160260             |

| Unit ID No. | PBR No. | Version No./Date Or<br>Registration No. | Monitoring Requirement |
|-------------|---------|---|------------------------|
| N/A         |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |

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

|  |   |
|--|---|
| Date: 04/16/2025   |   |
| Permit No.: O4537  |   |
| Regulated Entity No.: RN106160260  |   |
| Company Name: SWG Pipeline, LLC  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input type="checkbox"/> YES <input checked="" 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   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**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.

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

|                                   |
|-----------------------------------|
| Date: 04/16/2025                  |
| Permit No.: O4537                 |
| Regulated Entity No.: RN106160260 |
| Company Name: SWG Pipeline, LLC   |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | EE-08      | OP-UA2          | 179828               | Add engine.   |
| 2            | MS-A          | YES      | RECIP-08   | OP-UA12         | 179828               | Add reciprocating compressor.                                 |
| 3            | MS-A          | NO       | EE-01A     | OP-UA2          | 179828               | Add 30 TAC 117 applicability.                                 |
| 4            | MS-A          | NO       | EE-05A     | OP-UA2          | 179828               | Add 30 TAC 117 applicability.                                 |
| 5            | MS-A          | NO       | EE-07      | OP-UA2          | 179828               | Add 30 TAC 117 applicability.                                 |
| 6            | MS-A          | NO       | EH-01      | OP-UA5          | 179828               | No change – Demonstrate 30 TAC 117 non-applicability.         |
| 7            | MS-A          | NO       | EH-02      | OP-UA5          | 179828               | Add 30 TAC 117 applicability.                                 |
| 8            | MS-A          | YES      | EE-09      | OP-UA2          | 179828               | Add engine.   |
| 9            | MS-A          | YES      | RECIP-09   | OP-UA12         | 179828               | Add reciprocating compressor.                                 |
|              |               |          |            |                 |                      |   |

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3  
Texas Commission on Environmental Quality**

|   |   |
|---|---|
| Date: 04/16/2025  |   |
| Permit No.: O4537   |   |
| Regulated Entity No.: RN106160260   |   |
| Company Name: SWG Pipeline, LLC   |   |
| <b>I. Significant Revision</b> <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i> |   |
| A.  | Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>                 |
| B.  | Indicate the alternate language(s) in which public notice is required:  |
| C.  | Will, there be a change in air pollutant emissions as a result of the significant revision? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span> |

**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Thursday, April 10, 2025 2:20 PM  
**To:** Samantha Mendez  
**Cc:** Jeff Jackson; Lance Green; Benjamin Aucoin; Gabe Huerta; Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Samantha,

Thank you for the prompt response and for providing the Ponder WDP.

Have a great day!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

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**From:** Samantha Mendez <Samantha.Mendez@tceq.texas.gov>  
**Sent:** Thursday, April 10, 2025 1:06 PM  
**To:** Kayla Curtis <kc@resolutecompliance.com>  
**Cc:** Jeff Jackson <jj@resolutecompliance.com>; Lance Green <lance.green@enlink.com>; Benjamin Aucoin <benjamin.aucoin@enlink.com>; Gabe Huerta <gabe.huerta@enlink.com>; Rhyan Stone <Rhyan.Stone@tceq.texas.gov>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
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Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)



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**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Friday, April 4, 2025 11:55 AM

**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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.

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---

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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**Cc:** Jeff Jackson; Lance Green; Benjamin Aucoin; Gabe Huerta; Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** Working Draft Permit.docx

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**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_fac\\_tsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_fac_tsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
SWG Pipeline, L.L.C.

AUTHORIZING THE OPERATION OF  
Ponder Compressor Station  
NATURAL GAS EXTRACTION

LOCATED AT  
Denton County, Texas  
Latitude 33° 9' 21" Longitude 97° 15' 28"  
Regulated Entity Number: RN106160260

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

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

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

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

Permit No: Q4537 Issuance Date: \_\_\_\_\_

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

## Table of Contents

| Section   | Page |
|---|------|
| General Terms and Conditions .....  | 1    |
| Special Terms and Conditions: .....   | 1    |
| Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping<br>and Reporting..... | 1    |
| New Source Review Authorization Requirements .....  | 6    |
| Compliance Requirements.....  | 6    |
| Permit Location .....   | 8    |
| Attachments .....   | 9    |
| Applicable Requirements Summary.....  | 10   |
| New Source Review Authorization References .....  | 25   |
| Appendix A.....   | 28   |
| Acronym List .....  | 29   |

## **General Terms and Conditions**

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

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

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

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

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

## **Special Terms and Conditions:**

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

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

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

- F. For the purpose of generating emission reduction credits through 30 TAC Chapter 101, Subchapter H, Division 1 (Emission Credit Banking and Trading), the permit holder shall comply with the following requirements:
  - (i) Title 30 TAC § 101.302 (relating to General Provisions)
  - (ii) Title 30 TAC § 101.303 (relating to Emission Reduction Credit Generation Certification)
  - (iii) Title 30 TAC § 101.304 (relating to Mobile Emission Reduction Credit Generation and Certification)
  - (iv) Title 30 TAC § 101.309 (relating to Emission Credit Banking and Trading)
  - (v) The terms and conditions by which the emission limits are established to generate the reduction credit are applicable requirements of this permit
- 2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
  - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
- 3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
  - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit

holder shall comply with the following requirements for stationary vents at the site subject to this standard:

- (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(1)(E)
- (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
- (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:
  - (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
  - (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
  - (3) Records of all observations shall be maintained.
  - (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet



prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(5) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

- B. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
  - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
  - (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
  - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

- 4. The permit holder shall comply with the following requirements of 30 TAC Chapter 117:

- A. For stationary reciprocating engines subject to Subchapter D, Division 2 at minor sources of NO<sub>x</sub>:
  - (i) Title 30 TAC § 117.2110(a) - (e) (relating to Emission Specifications)
  - (ii) Title 30 TAC § 117.2130 (relating to Operating Requirements)
  - (iii) Title 30 TAC § 117.2135 (relating to Monitoring and Testing Requirements)
  - (iv) Title 30 TAC § 117.2145 (relating to Recordkeeping and Reporting Requirements)
  - (v) Title 30 TAC § 117.9210 (relating to Compliance Schedule)
- 5. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
  - B. Title 40 CFR § 60.8 (relating to Performance Tests)
  - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 6. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
- 7. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
  - A. Title 40 CFR § 63.760(a)(1)(i) - (iii) (relating to Applicability and Designation of Affected Source)
- 8. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

## **New Source Review Authorization Requirements**

9. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated January 25, 2024 in the application for project 35900), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
10. 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.
11. 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).

## **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).

- C. The permit holder shall comply with the requirements of 30 TAC § 117.452 for Final Control Plan Procedures for Reasonably Available Control Technology (RACT) and 30 TAC § 117.456 for Revision of Final Control Plan.
  - D. The permit holder shall comply with the requirements of 30 TAC § 117.454 for Final Control Plan Procedures for Attainment Demonstration Emission Specifications and 30 TAC § 117.456 for Revision of Final Control Plan.
  - E. The permit holder shall comply with the requirement in 30 TAC § 117.450(b) for identification of exempt units in the Initial Control Plan.
14. Use of Emission Credits to comply with applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) Offsets for Title 30 TAC Chapter 116
  - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)-(d)
    - (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
    - (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)-(d)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
    - (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)
15. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) If applicable, offsets for Title 30 TAC Chapter 116
    - (iv) Temporarily exceed state NSR permit allowables

- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

**Permit Location**

16. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit at Bridgeport Gas Plant - 415 Private Road 3502, Bridgeport, Texas 76426.

## **Attachments**

**Applicable Requirements Summary**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

|                           |           |
|---------------------------|-----------|
| <b>Unit Summary .....</b> | <b>11</b> |
|---------------------------|-----------|

|  |           |
|--|-----------|
| <b>Applicable Requirements Summary .....</b> | <b>13</b> |
|--|-----------|

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

### Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type                   | Group/Inclusive<br>Units | SOP Index No. | Regulation                          | Requirement Driver      |
|-------------------------------|-----------------------------|--------------------------|---------------|-------------------------------------|-------------------------|
| DEHY-01                       | GLYCOL DEHYDRATION          | N/A                      | 63HH-1        | 40 CFR Part 63, Subpart HH          | No changing attributes. |
| EE-01A                        | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-01A                        | SRIC ENGINES                | N/A                      | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EH-02                         | PROCESS<br>HEATERS/FURNACES | N/A                      | R117-3        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| RECIP-05A                     | FUGITIVE EMISSION<br>UNITS  | N/A                      | 60OOOOa-2     | 40 CFR Part 60, Subpart<br>OOOOa    | No changing attributes. |



### Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type                  | Group/Inclusive<br>Units | SOP Index No. | Regulation                      | Requirement Driver      |
|-------------------------------|----------------------------|--------------------------|---------------|---------------------------------|-------------------------|
| RECIP-08                      | FUGITIVE EMISSION<br>UNITS | N/A                      | 600000-3      | 40 CFR Part 60, Subpart<br>0000 | No changing attributes. |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant       | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements   | Recordkeeping Requirements (30 TAC § 122.144)  | Reporting Requirements (30 TAC § 122.145)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
| DEHY-01                   | EU                      | 63HH-1        | 112(B) HAPS     | 40 CFR Part 63, Subpart HH            | § 63.764(e)(1)(ii)<br>§ 63.764(a)<br>§ 63.764(e)(1)<br>§ 63.764(j)<br>§ 63.775(c)(8)  | The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.  | [G]§ 63.772(b)(2)   | § 63.774(d)(1)<br>§ 63.774(d)(1)(ii)   | None  |
| EE-01A                    | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-01A                    | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(iii)(II)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)   | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)  | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010  |

### 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)  |
|---------------------------|-------------------------|---------------|----------------|---------------------------------------|--|--|--|---|--|
|                           |                         |               |                |                                       | § 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j)           | on or after June 1, 2007 fired on other than landfill gas, NOx emissions in excess of 0.50 g/hp-hr.  | § 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b)  |   | [G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7)  |
| EE-01A                    | EU                      | 63ZZZZ-1      | 112(B)<br>HAPS | 40 CFR Part 63, Subpart ZZZZ          | § 63.6603(a)-Table 2d.9<br>§ 63.6595(a)(1)<br>§ 63.6605(a)<br>§ 63.6605(b)<br>§ 63.6625(h)<br>§ 63.6640(a)-Table 6.14.a.iii<br>§ 63.6640(b)<br>§ 63.6640(c)(7) | For each existing non-emergency, non-black start 4SLB stationary RICE with a site rating greater than 500 HP that is not a remote stationary RICE and that operates more than 24 hours per calendar year, you must install an oxidation catalyst to reduce HAP emissions from the stationary RICE. | § 63.6612(a)<br>[G]§ 63.6612(b)<br>§ 63.6620(a)<br>§ 63.6620(a)-Table 4.3.a.i<br>§ 63.6620(a)-Table 4.3.a.ii<br>§ 63.6620(a)-Table 4.3.a.iii<br>§ 63.6620(a)-Table 4.3.a.v<br>§ 63.6620(b)<br>§ 63.6620(d)<br>[G]§ 63.6620(e)(2)<br>§ 63.6630(a)-Table 5.13.a.i<br>§ 63.6630(a)-Table 5.13.a.ii<br>§ 63.6630(e)<br>§ 63.6630(e)(1)<br>§ 63.6630(e)(2)<br>§ 63.6630(e)(3) | § 63.6635(a)<br>§ 63.6635(c)<br>§ 63.6655(a)<br>§ 63.6655(a)(1)<br>§ 63.6655(a)(2)<br>§ 63.6655(a)(3)<br>§ 63.6655(a)(4)<br>§ 63.6655(a)(5)<br>§ 63.6655(d)<br>§ 63.6655(e)<br>§ 63.6660(a)<br>§ 63.6660(b)<br>§ 63.6660(c) | § 63.6640(b)<br>§ 63.6640(e)<br>§ 63.6645(a)<br>§ 63.6645(g)<br>§ 63.6645(h)<br>§ 63.6650(a)<br>§ 63.6650(a)-Table 7.3<br>§ 63.6650(b)<br>§ 63.6650(b)(1)<br>§ 63.6650(b)(2)<br>§ 63.6650(b)(3)<br>§ 63.6650(b)(4)<br>[G]§ 63.6650(c)<br>[G]§ 63.6650(d)<br>§ 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)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
|                           |                         |               |                 |                                       |   |   | § 63.6630(e)(5)<br>§ 63.6635(a)<br>§ 63.6635(b)<br>§ 63.6640(a)<br>§ 63.6640(a)-Table 6.14.a.i<br>§ 63.6640(a)-Table 6.14.a.iii<br>§ 63.6640(b)<br>§ 63.6640(c)<br>§ 63.6640(c)(1)<br>§ 63.6640(c)(2)<br>§ 63.6640(c)(3)<br>§ 63.6640(c)(5)<br>§ 63.6640(c)(7)  |  |   |
| EE-05A                    | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-05A                    | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(iii)(II)   | No person shall allow the discharge from gas-fired lean-burn engines placed   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)  | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)  | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|--|--|---|---|--|
|                           |                         |               |                 |                                       | § 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j) | into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill gas, NOx emissions in excess of 0.50 g/hp-hr.  | § 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | [G]§ 117.445(f)(3)<br>§ 117.445(f)(8)   | [G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-05A                    | EU                      | 60JJJ-2       | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)  | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-05A                    | EU                      | 60JJJ-2       | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)  | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant   | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)   | Reporting Requirements (30 TAC § 122.145)  |
|---------------------------|-------------------------|---------------|-------------|---------------------------------------|---|--|--|---|--|
|                           |                         |               |             |                                       |   | comply with a NOx emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.   |  |   |  |
| EE-05A                    | EU                      | 60JJJJ-2      | VOC         | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-05A                    | EU                      | 63ZZZZ-2      | 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   |
| EE-07                     | EU                      | R117-1        | CO          | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)           | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)                                     | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8)  | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1) |

### 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)  | subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b)   |  | § 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7)   |
| EE-07                     | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(I)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j) | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill gas, NO <sub>x</sub> emissions in excess of 0.50 g/hp-hr.        | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-07                     | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1  | Owners and operators of stationary non-emergency   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)   | [G]§ 60.4245(c)<br>§ 60.4245(d)   |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant       | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)   | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|--|---|---|
|                           |                         |               |                 |                                       | § 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)                         | natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart.   | § 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)   | § 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4)   |   |
| EE-07                     | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a NO <sub>x</sub> emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)                 | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| EE-07                     | EU                      | 60JJJJ-2      | VOC             | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.             | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| EE-07                     | EU                      | 63ZZZZ-2      | 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   | None   | None  | 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)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
|                           |                         |               |                 |                                       |   | 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.  |   |  |   |
| EE-08                     | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-08                     | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(iii)(II)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)                        | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)   | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|--|---|--|
|                           |                         |               |                 |                                       | § 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j)                 | gas, NOx emissions in excess of 0.50 g/hp-hr.   | § 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) |   | § 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-08                     | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-08                     | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NOx emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-08                     | EU                      | 60JJJJ-2      | VOC             | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234   | Owners and operators of stationary non-emergency natural gas engines with a   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)  | [G]§ 60.4245(c)<br>§ 60.4245(d)  |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant      | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation                      | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)                         | Reporting Requirements (30 TAC § 122.145)  |
|---------------------------|-------------------------|---------------|----------------|---------------------------------------|--|--|--|---|--|
|                           |                         |               |                |                                       | § 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g)   | § 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) |  |
| EE-08                     | EU                      | 63ZZZZ-2      | 112(B)<br>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   |
| EH-02                     | EU                      | R117-3        | CO             | 30 TAC Chapter 117, Subchapter B      | § 117.410(c)(1)<br>§ 117.410(c)(1)(B)<br>§ 117.410(c)(3)<br>§ 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)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>§ 117.445(f)(8)    | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |

### 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|--|--|--|--|
| EH-02                     | EU                      | R117-3        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(3)(B)<br>§ 117.410(a)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.440(j)                                     | No person shall allow the discharge from process heaters with a maximum rated capacity less than 40 MMBtu/hr, NO <sub>x</sub> emissions in excess of 0.036 lb/MMBtu (or alternatively, 30 ppmv, at 3.0% oxygen, dry basis).  | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| RECIP-05A                 | EU                      | 600000a-2     | VOC             | 40 CFR Part 60, Subpart OOOOa         | § 60.5385a(a)(1)<br>§ 60.5370a(a)<br>§ 60.5370a(b)<br>§ 60.5385a<br>§ 60.5385a(a)<br>§ 60.5385a(b)<br>§ 60.5385a(c)<br>§ 60.5385a(d)<br>§ 60.5410a<br>§ 60.5415a(c)<br>§ 60.5415a(c)(2)<br>§ 60.5415a(c)(3) | For each reciprocating compressor, the owner or operator must replace the rod packing on or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, August 2, 2016, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later. | § 60.5410a(c)(1)<br>§ 60.5415a(c)(1)   | § 60.5410a(c)(4)<br>§ 60.5420a(c)<br>[G]§ 60.5420a(c)(3)           | § 60.5410a(c)(3)<br>§ 60.5420a(a)<br>§ 60.5420a(a)(1)<br>§ 60.5420a(b)<br>[G]§ 60.5420a(b)(1)<br>§ 60.5420a(b)(11)<br>[G]§ 60.5420a(b)(13)<br>[G]§ 60.5420a(b)(14)<br>[G]§ 60.5420a(b)(4)  |
| RECIP-08                  | EU                      | 600000-3      | VOC             | 40 CFR Part 60, Subpart OOOO          | § 60.5385(a)(1)<br>§ 60.5370(b)<br>§ 60.5385(a)<br>§ 60.5415(c)(3)<br>§ 60.5420(a)(1)   | Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial  | § 60.5410(c)(1)<br>§ 60.5415(c)(1)   | § 60.5420(c)<br>[G]§ 60.5420(c)(3)                                 | § 60.5420(a)<br>§ 60.5420(a)(1)<br>§ 60.5420(b)<br>[G]§ 60.5420(b)(1)<br>[G]§ 60.5420(b)(4)<br>§ 60.5420(b)(7)(i)  |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements | Recordkeeping Requirements (30 TAC § 122.144) | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|-------------------------------------|---|---|
|                           |                         |               |           |                                       |   | startup of your reciprocating compressor affected facility, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later. |                                     |   |   |

**New Source Review Authorization References**

|  |           |
|--|-----------|
| <b>New Source Review Authorization References .....</b>                  | <b>26</b> |
| <b>New Source Review Authorization References by Emission Unit .....</b> | <b>27</b> |

### **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.

| <b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b> |                              |
|--|------------------------------|
| Number: 106.352  | Version No./Date: 11/22/2012 |
| Number: 106.512  | Version No./Date: 06/13/2001 |

### 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** |
|---------------------------|--------------------------------|-----------------------------------|
| DEHY-01                   | TEG DEHYDRATOR 1               | 106.352/11/22/2012 [96573]        |
| EE-01A                    | COMPRESSOR ENGINE 1            | 106.352/11/22/2012 [96573]        |
| EE-05A                    | COMPRESSOR ENGINE 2            | 106.352/11/22/2012 [96573]        |
| EE-07                     | COMPRESSOR ENGINE 3            | 106.352/11/22/2012 [96573]        |
| EE-08                     | COMPRESSOR ENGINE 8            | 106.512/06/13/2001 [96573]        |
| EH-02                     | AMINE REBOILER                 | 106.352/11/22/2012 [96573]        |
| RECIP-05A                 | RECIPROCATING COMPRESSOR 2     | 106.352/11/22/2012 [96573]        |
| RECIP-08                  | RECIPROCATING COMPRESSOR 8     | 106.352/11/22/2012 [96573]        |

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



**Appendix A**

**Acronym List ..... 29**

## Acronym List

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

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

**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Thursday, April 10, 2025 12:14 PM  
**To:** Samantha Mendez  
**Cc:** Jeff Jackson; Lance Green; Benjamin Aucoin; Gabe Huerta; Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** Working Draft Permit.docx

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

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**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Friday, April 4, 2025 11:55 AM  
**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.

- For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Sky Global Power One, LLC

AUTHORIZING THE OPERATION OF  
Rock Island  
Sgp1  
Fossil Fuel Electric Power Generation

LOCATED AT  
Colorado County, Texas  
Latitude 29° 33' 0" Longitude 96° 32' 15"  
Regulated Entity Number: RN107585721

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

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

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

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

Permit No: Q3799 Issuance Date: \_\_\_\_\_

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



## Table of Contents

| Section   | Page |
|---|------|
| General Terms and Conditions .....  | 1    |
| Special Terms and Conditions: .....   | 1    |
| Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping<br>and Reporting..... | 1    |
| New Source Review Authorization Requirements .....  | 6    |
| Compliance Requirements.....  | 7    |
| Risk Management Plan .....  | 7    |
| Protection of Stratospheric Ozone .....   | 8    |
| Temporary Fuel Shortages (30 TAC § 112.15) .....  | 8    |
| Permit Location .....   | 8    |
| Permit Shield (30 TAC § 122.148) .....  | 8    |
| Acid Rain Unit Exemptions .....   | 8    |
| Attachments .....   | 9    |
| Applicable Requirements Summary.....  | 10   |
| Additional Monitoring Requirements .....  | 16   |
| Permit Shield .....   | 18   |
| New Source Review Authorization References .....  | 20   |
| Appendix A.....   | 24   |
| Acronym List .....  | 25   |

## **General Terms and Conditions**

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

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

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

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

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

## **Special Terms and Conditions:**

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

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

- E. Emission units subject to 40 CFR Part 63, Subpart ZZZZ as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.1090 which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive

ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

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

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

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

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

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

condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

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

C. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.

D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:

- (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
- (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
- (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

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

- A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
- B. Title 40 CFR § 60.8 (relating to Performance Tests)
- C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
- D. Title 40 CFR § 60.12 (relating to Circumvention)

- E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.

#### **New Source Review Authorization Requirements**

6. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated MON DAY, YYYY in the application for project XXXXX), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
- A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
7. 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.
8. 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).
9. 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. Requirements of the Electric Generating Unit Standard Permit for facilities located in the East Texas region based on the information contained in the registration application.

### **Compliance Requirements**

10. 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.
11. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
- (i) Title 30 TAC Chapter 115
  - (ii) Title 30 TAC Chapter 117
  - (iii) If applicable, offsets for Title 30 TAC Chapter 116
  - (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

### **Risk Management Plan**

12. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.



### **Protection of Stratospheric Ozone**

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

### **Temporary Fuel Shortages (30 TAC § 112.15)**

14. The permit holder shall comply with the following 30 TAC Chapter 112 requirements:
  - A. Title 30 TAC § 112.15 (relating to Temporary Fuel Shortage Plan Filing Requirements)
  - B. Title 30 TAC § 112.16(a), (a)(1), and (a)(2)(B) - (C) (relating to Temporary Fuel Shortage Plan Operating Requirements)
  - C. Title 30 TAC § 112.17 (relating to Temporary Fuel Shortage Plan Notification Procedures)
  - D. Title 30 TAC § 112.18 (relating to Temporary Fuel Shortage Plan Reporting Requirements)

### **Permit Location**

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

### **Permit Shield (30 TAC § 122.148)**

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

### **Acid Rain Unit Exemptions**

17. Emission units; ENGINE1, ENGINE2, ENGINE3, ENGINE4, ENGINE5, and ENGINE6; meet the new unit exemption criteria in 40 CFR § 72.7(a) and are exempt from the Acid Rain Program. The permit holder shall keep records in accordance with 40 CFR § 72.7(f) to demonstrate that the new unit exemption is being met.

## **Attachments**

**Applicable Requirements Summary**

**Additional Monitoring Requirements**

**Permit Shield**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

**Unit Summary ..... 11**

**Applicable Requirements Summary ..... 12**

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

### Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type    | Group/Inclusive<br>Units  | SOP Index No. | Regulation                              | Requirement Driver      |
|-------------------------------|--------------|---|---------------|---|-------------------------|
| EMGEN                         | SRIC ENGINES | N/A   | 60III-1       | 40 CFR Part 60, Subpart IIII            | No changing attributes. |
| EMGEN                         | SRIC ENGINES | N/A   | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ         | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | N/A           | 30 TAC Chapter 116,<br>Standard Permits | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | 60JJJJ-1      | 40 CFR Part 60, Subpart<br>JJJJ         | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ         | No changing attributes. |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant              | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation  | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements | Recordkeeping Requirements (30 TAC § 122.144) | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|------------------------|---------------------------------------|--|--|-------------------------------------|---|---|
| EMGEN                     | EU                      | 60III-1       | CO                     | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder and is a 2007 model year and later must comply with a CO emission limit of 5.0 g/KW-hr, as stated in 40 CFR 60.4202(e)-(f), 40 CFR 1042.101, and 40 CFR 1042-Appendix I.                                    | None                                | None  | [G]§ 60.4214(d)                           |
| EMGEN                     | EU                      | 60III-1       | HC and NO <sub>x</sub> | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power less than 600 KW and a displacement of greater than or equal to 15 liters per cylinder and less than 20 liters per cylinder and is a 2014 model year and later must comply with an HC+NO <sub>x</sub> emission limit of 6.2 g/KW-hr, as stated in 40 CFR 60.4202(f)(2) and 40 CFR 1042.101. | None                                | None  | [G]§ 60.4214(d)                           |
| EMGEN                     | EU                      | 60III-1       | PM                     | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power less than 600 KW and a displacement of greater than or equal to 15 liters per cylinder and less   | None                                | None  | [G]§ 60.4214(d)                           |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant         | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)   | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-------------------|---------------------------------------|---|--|--|---|---|
|                           |                         |               |                   |                                       |   | than 20 liters per cylinder and is a 2014 model year and later must comply with a PM emission limit of 0.14 g/KW-hr, as stated in 40 CFR 60.4202(f)(2) and 40 CFR 1042.101.  |  |   |   |
| EMGEN                     | EU                      | 63ZZZZ-1      | 112(B) HAPS       | 40 CFR Part 63, Subpart ZZZZ          | § 63.6590(b)(1)<br>§ 63.6595(c)<br>§ 63.6640(f)(1)<br>§ 63.6640(f)(2)<br>§ 63.6640(f)(2)(i)<br>§ 63.6640(f)(3)              | An affected source which meets either of the criteria in paragraphs §63.6590(b)(1)(i)-(ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f).         | None   | None  | § 63.6645(f)                              |
| GRPENG                    | EU                      | N/A           | CO, FORMALD EHYDE | 30 TAC Chapter 116, Standard Permits  | 122107  | 122107   | 122107<br>** See CAM Summary   | 122107  | 122107                                    |
| GRPENG                    | EU                      | 60JJJJ-1      | CO                | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| GRPENG                    | EU                      | 60JJJJ-1      | NO <sub>x</sub>   | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)                                 | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)                 | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)                    | [G]§ 60.4245(c)<br>§ 60.4245(d)           |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)  | Reporting Requirements (30 TAC § 122.145)   |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|--|--|---|
|                           |                         |               |           |                                       | § 60.4243(e)<br>§ 60.4243(g)  | on or after 07/01/2010 must comply with a NOx emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4244(d)   | § 60.4245(a)(4)  |   |
| GRPENG                    | EU                      | 60JJJJ-1      | VOC       | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)   | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4)  | [G]§ 60.4245(c)<br>§ 60.4245(d)   |
| GRPENG                    | EU                      | 63ZZZZ-1      | CO        | 40 CFR Part 63, Subpart ZZZZ          | § 63.6600(b)-Table 2a.2.a<br>§ 63.6595(c)<br>§ 63.6600(b)-Table 2b.1.a<br>§ 63.6600(b)-Table 2b.1.b<br>§ 63.6605(a)<br>§ 63.6605(b)<br>§ 63.6625(h)<br>§ 63.6630(a)<br>§ 63.6630(b)<br>§ 63.6640(b) | For each new or reconstructed 4SLB stationary RICE with a site rating equal to or more than 500 brake HP located at major source of HAP emissions, operating at 100% load plus or minus 10%, you must reduce CO emission by 93% or more.                                  | § 63.6610(a)<br>§ 63.6610(b)<br>§ 63.6610(c)<br>§ 63.6615<br>§ 63.6620(a)<br>§ 63.6620(a)-Table 3.1<br>§ 63.6620(a)-Table 4.1.a.i<br>§ 63.6620(a)-Table 4.1.a.ii<br>§ 63.6620(a)-Table 4.1.a.iii<br>§ 63.6620(b)<br>§ 63.6620(b)(2)<br>§ 63.6620(d)<br>§ 63.6620(e)(1)<br>[G]§ 63.6620(e)(2)<br>[G]§ 63.6625(b)<br>§ 63.6630(a)-Table 5.1.a.i<br>§ 63.6630(a)-Table 5.1.a.ii | § 63.6620(i)<br>§ 63.6630(a)-Table 5.1.a.iii<br>§ 63.6635(a)<br>§ 63.6635(c)<br>§ 63.6655(a)<br>§ 63.6655(a)(1)<br>§ 63.6655(a)(2)<br>§ 63.6655(a)(3)<br>§ 63.6655(a)(4)<br>§ 63.6655(a)(5)<br>[G]§ 63.6655(b)<br>§ 63.6655(d)<br>§ 63.6660(a)<br>§ 63.6660(b)<br>§ 63.6660(c) | § 63.6620(i)<br>§ 63.6630(c)<br>§ 63.6640(b)<br>§ 63.6640(e)<br>§ 63.6645(a)<br>§ 63.6645(c)<br>§ 63.6645(g)<br>§ 63.6645(h)<br>§ 63.6645(h)(2)<br>§ 63.6650(a)<br>§ 63.6650(a)-Table 7.1.a.i<br>§ 63.6650(a)-Table 7.1.b<br>§ 63.6650(a)-Table 7.1.c<br>§ 63.6650(b)<br>§ 63.6650(b)(1)<br>§ 63.6650(b)(2)<br>§ 63.6650(b)(3)<br>§ 63.6650(b)(4)<br>[G]§ 63.6650(c)<br>[G]§ 63.6650(e)<br>§ 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<br>(30 TAC § 122.144) | Reporting Requirements<br>(30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|--|--|--|
|                           |                         |               |           |                                       |   |   | § 63.6630(a)-Table 5.1.a.iii<br>§ 63.6635(a)<br>§ 63.6635(b)<br>§ 63.6640(a)<br>§ 63.6640(a)-Table 6.1.a.i<br>§ 63.6640(a)-Table 6.1.a.ii<br>§ 63.6640(a)-Table 6.1.a.iii<br>§ 63.6640(a)-Table 6.1.a.iv<br>§ 63.6640(a)-Table 6.1.a.v<br>§ 63.6640(b) |  |  |



**Additional Monitoring Requirements**

**Compliance Assurance Monitoring Summary ..... 17**

### CAM Summary

| Unit/Group/Process Information   |  |
|--|--|
| ID No.: GRPENG   |  |
| Control Device ID No.: OXCAT   | Control Device Type: Other control device type |
| Applicable Regulatory Requirement  |  |
| Name: 30 TAC Chapter 116, Standard Permits   | SOP Index No.: N/A                             |
| Pollutant: CO, FORMALDEHYDE  | Main Standard: 122107                          |
| Monitoring Information   |  |
| Indicator: Catalyst inlet temperature and pressure drop across catalyst  |  |
| Minimum Frequency: Once every 15 minutes for catalyst inlet temperature. Once per month for pressure drop readings.  |  |
| Averaging Period: 4-hour rolling average catalyst inlet temperature  |  |
| Deviation Limit: Maintain minimum catalyst inlet temperature and maintain pressure drop across catalyst established in performance test.   |  |
| <p>CAM Text: Monitor the catalyst inlet temperature and pressure drop across the catalyst. The permit holder shall calibrate, maintain, and operate instrumentation using procedures that take into account manufacturer's specifications.</p> <p>The catalyst inlet temperature and pressure drop readings must meet the range documented in the last successful performance test. Any monitoring data that exceeds the established deviation limits shall be considered and reported as a deviation.</p> |  |

**Permit Shield**

**Permit Shield ..... 19**

### Permit Shield

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

| Unit / Group / Process ID No. | Group / Inclusive Units                              | Regulation                                   | Basis of Determination  |
|-------------------------------|--|--|---|
| GLYC-TK-11                    | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK10                     | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK12                     | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK3                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK4                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK5                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK6                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK7                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK8                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK9                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GRPENG                        | ENGINE1, ENGINE2, ENGINE3, ENGINE4, ENGINE5, ENGINE6 | 30 TAC Chapter 117, Subchapter E, Division 1 | 30 TAC Chapter 117, Subchapter E, Division 1 does not apply in Colorado county. |
| LUBE-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| LUBE-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| UREA-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| UREA-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |

**New Source Review Authorization References**

|  |           |
|--|-----------|
| <b>New Source Review Authorization References .....</b>                  | <b>21</b> |
| <b>New Source Review Authorization References by Emission Unit .....</b> | <b>22</b> |

### 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.: 122107  | Issuance Date:               |
| Permits By Rule (30 TAC Chapter 106) for the Application Area  |                              |
| Number: 106.472  | Version No./Date: 09/04/2000 |
| Number: 106.511  | Version No./Date: 09/04/2000 |
| Number: 106.512  | 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** |
|---------------------------|--------------------------------|-----------------------------------|
| EMGEN                     | EMERGENCY GENERATOR            | 106.512/09/04/2000                |
| ENGINE1                   | ENGINE                         | 122107                            |
| ENGINE2                   | ENGINE                         | 122107                            |
| ENGINE3                   | ENGINE                         | 122107                            |
| ENGINE4                   | ENGINE                         | 122107                            |
| ENGINE5                   | ENGINE                         | 122107                            |
| ENGINE6                   | ENGINE                         | 122107                            |
| GLYC-TK-11                | STORAGE TANK                   | 122107                            |
| GLYC-TK1                  | STORAGE TANK                   | 122107                            |
| GLYC-TK10                 | STORAGE TANK                   | 122107                            |
| GLYC-TK12                 | STORAGE TANK                   | 122107                            |
| GLYC-TK2                  | STORAGE TANK                   | 122107                            |
| GLYC-TK3                  | STORAGE TANK                   | 122107                            |
| GLYC-TK4                  | STORAGE TANK                   | 122107                            |
| GLYC-TK5                  | STORAGE TANK                   | 122107                            |
| GLYC-TK6                  | STORAGE TANK                   | 122107                            |
| GLYC-TK7                  | STORAGE TANK                   | 122107                            |
| GLYC-TK8                  | STORAGE TANK                   | 122107                            |
| GLYC-TK9                  | STORAGE TANK                   | 122107                            |
| LUBE-TK1                  | STORAGE TANK                   | 122107                            |
| LUBE-TK2                  | STORAGE TANK                   | 122107                            |

### **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.

| <b>Unit/Group/Process<br/>ID No.</b> | <b>Emission Unit Name/Description</b> | <b>New Source Review Authorization**</b> |
|--------------------------------------|---------------------------------------|--|
| UREA-TK1                             | STORAGE TANK                          | 122107                                   |
| UREA-TK2                             | STORAGE TANK                          | 122107                                   |

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



**Appendix A**

**Acronym List ..... 25**

## Acronym List

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

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

**From:** Samantha Mendez  
**Sent:** Friday, April 4, 2025 11:55 AM  
**To:** Lance.Green@enlink.com  
**Cc:** Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** Working Draft Permit.docx

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** Lance.Green@enlink.com  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.

- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Sky Global Power One, LLC

AUTHORIZING THE OPERATION OF  
Rock Island  
Sgp1  
Fossil Fuel Electric Power Generation

LOCATED AT  
Colorado County, Texas  
Latitude 29° 33' 0" Longitude 96° 32' 15"  
Regulated Entity Number: RN107585721

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

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

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

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

Permit No: Q3799 Issuance Date: \_\_\_\_\_

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



## Table of Contents

| Section   | Page |
|---|------|
| General Terms and Conditions .....  | 1    |
| Special Terms and Conditions: .....   | 1    |
| Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping<br>and Reporting..... | 1    |
| New Source Review Authorization Requirements .....  | 6    |
| Compliance Requirements.....  | 7    |
| Risk Management Plan .....  | 7    |
| Protection of Stratospheric Ozone .....   | 8    |
| Temporary Fuel Shortages (30 TAC § 112.15) .....  | 8    |
| Permit Location .....   | 8    |
| Permit Shield (30 TAC § 122.148) .....  | 8    |
| Acid Rain Unit Exemptions .....   | 8    |
| Attachments .....   | 9    |
| Applicable Requirements Summary.....  | 10   |
| Additional Monitoring Requirements .....  | 16   |
| Permit Shield .....   | 18   |
| New Source Review Authorization References .....  | 20   |
| Appendix A.....   | 24   |
| Acronym List .....  | 25   |

## **General Terms and Conditions**

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

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

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

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

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

## **Special Terms and Conditions:**

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

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

- E. Emission units subject to 40 CFR Part 63, Subpart ZZZZ as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.1090 which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive

ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

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

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

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

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

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

condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

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

C. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.

D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:

- (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
- (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
- (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

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

- A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
- B. Title 40 CFR § 60.8 (relating to Performance Tests)
- C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
- D. Title 40 CFR § 60.12 (relating to Circumvention)

- E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.

#### **New Source Review Authorization Requirements**

6. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated MON DAY, YYYY in the application for project XXXXX), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
- A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
7. 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.
8. 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).
9. 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. Requirements of the Electric Generating Unit Standard Permit for facilities located in the East Texas region based on the information contained in the registration application.

### **Compliance Requirements**

10. 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.
11. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
- (i) Title 30 TAC Chapter 115
  - (ii) Title 30 TAC Chapter 117
  - (iii) If applicable, offsets for Title 30 TAC Chapter 116
  - (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

### **Risk Management Plan**

12. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.



### **Protection of Stratospheric Ozone**

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

### **Temporary Fuel Shortages (30 TAC § 112.15)**

14. The permit holder shall comply with the following 30 TAC Chapter 112 requirements:
  - A. Title 30 TAC § 112.15 (relating to Temporary Fuel Shortage Plan Filing Requirements)
  - B. Title 30 TAC § 112.16(a), (a)(1), and (a)(2)(B) - (C) (relating to Temporary Fuel Shortage Plan Operating Requirements)
  - C. Title 30 TAC § 112.17 (relating to Temporary Fuel Shortage Plan Notification Procedures)
  - D. Title 30 TAC § 112.18 (relating to Temporary Fuel Shortage Plan Reporting Requirements)

### **Permit Location**

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

### **Permit Shield (30 TAC § 122.148)**

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

### **Acid Rain Unit Exemptions**

17. Emission units; ENGINE1, ENGINE2, ENGINE3, ENGINE4, ENGINE5, and ENGINE6; meet the new unit exemption criteria in 40 CFR § 72.7(a) and are exempt from the Acid Rain Program. The permit holder shall keep records in accordance with 40 CFR § 72.7(f) to demonstrate that the new unit exemption is being met.

## **Attachments**

**Applicable Requirements Summary**

**Additional Monitoring Requirements**

**Permit Shield**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

|                           |           |
|---------------------------|-----------|
| <b>Unit Summary .....</b> | <b>11</b> |
|---------------------------|-----------|

|  |           |
|--|-----------|
| <b>Applicable Requirements Summary .....</b> | <b>12</b> |
|--|-----------|

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

### Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type    | Group/Inclusive<br>Units  | SOP Index No. | Regulation                              | Requirement Driver      |
|-------------------------------|--------------|---|---------------|---|-------------------------|
| EMGEN                         | SRIC ENGINES | N/A   | 60III-1       | 40 CFR Part 60, Subpart IIII            | No changing attributes. |
| EMGEN                         | SRIC ENGINES | N/A   | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ         | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | N/A           | 30 TAC Chapter 116,<br>Standard Permits | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | 60JJJJ-1      | 40 CFR Part 60, Subpart<br>JJJJ         | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ         | No changing attributes. |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant              | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation  | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements | Recordkeeping Requirements (30 TAC § 122.144) | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|------------------------|---------------------------------------|--|--|-------------------------------------|---|---|
| EMGEN                     | EU                      | 60III-1       | CO                     | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder and is a 2007 model year and later must comply with a CO emission limit of 5.0 g/KW-hr, as stated in 40 CFR 60.4202(e)-(f), 40 CFR 1042.101, and 40 CFR 1042-Appendix I.                                    | None                                | None  | [G]§ 60.4214(d)                           |
| EMGEN                     | EU                      | 60III-1       | HC and NO <sub>x</sub> | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power less than 600 KW and a displacement of greater than or equal to 15 liters per cylinder and less than 20 liters per cylinder and is a 2014 model year and later must comply with an HC+NO <sub>x</sub> emission limit of 6.2 g/KW-hr, as stated in 40 CFR 60.4202(f)(2) and 40 CFR 1042.101. | None                                | None  | [G]§ 60.4214(d)                           |
| EMGEN                     | EU                      | 60III-1       | PM                     | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power less than 600 KW and a displacement of greater than or equal to 15 liters per cylinder and less   | None                                | None  | [G]§ 60.4214(d)                           |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant         | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)   | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-------------------|---------------------------------------|---|--|--|---|---|
|                           |                         |               |                   |                                       |   | than 20 liters per cylinder and is a 2014 model year and later must comply with a PM emission limit of 0.14 g/KW-hr, as stated in 40 CFR 60.4202(f)(2) and 40 CFR 1042.101.  |  |   |   |
| EMGEN                     | EU                      | 63ZZZZ-1      | 112(B) HAPS       | 40 CFR Part 63, Subpart ZZZZ          | § 63.6590(b)(1)<br>§ 63.6595(c)<br>§ 63.6640(f)(1)<br>§ 63.6640(f)(2)<br>§ 63.6640(f)(2)(i)<br>§ 63.6640(f)(3)              | An affected source which meets either of the criteria in paragraphs §63.6590(b)(1)(i)-(ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f).         | None   | None  | § 63.6645(f)                              |
| GRPENG                    | EU                      | N/A           | CO, FORMALD EHYDE | 30 TAC Chapter 116, Standard Permits  | 122107  | 122107   | 122107<br>** See CAM Summary   | 122107  | 122107                                    |
| GRPENG                    | EU                      | 60JJJJ-1      | CO                | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| GRPENG                    | EU                      | 60JJJJ-1      | NO <sub>x</sub>   | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)                                 | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)                 | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)                    | [G]§ 60.4245(c)<br>§ 60.4245(d)           |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)  | Reporting Requirements (30 TAC § 122.145)   |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|--|--|---|
|                           |                         |               |           |                                       | § 60.4243(e)<br>§ 60.4243(g)  | on or after 07/01/2010 must comply with a NOx emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4244(d)   | § 60.4245(a)(4)  |   |
| GRPENG                    | EU                      | 60JJJJ-1      | VOC       | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)   | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4)  | [G]§ 60.4245(c)<br>§ 60.4245(d)   |
| GRPENG                    | EU                      | 63ZZZZ-1      | CO        | 40 CFR Part 63, Subpart ZZZZ          | § 63.6600(b)-Table 2a.2.a<br>§ 63.6595(c)<br>§ 63.6600(b)-Table 2b.1.a<br>§ 63.6600(b)-Table 2b.1.b<br>§ 63.6605(a)<br>§ 63.6605(b)<br>§ 63.6625(h)<br>§ 63.6630(a)<br>§ 63.6630(b)<br>§ 63.6640(b) | For each new or reconstructed 4SLB stationary RICE with a site rating equal to or more than 500 brake HP located at major source of HAP emissions, operating at 100% load plus or minus 10%, you must reduce CO emission by 93% or more.                                  | § 63.6610(a)<br>§ 63.6610(b)<br>§ 63.6610(c)<br>§ 63.6615<br>§ 63.6620(a)<br>§ 63.6620(a)-Table 3.1<br>§ 63.6620(a)-Table 4.1.a.i<br>§ 63.6620(a)-Table 4.1.a.ii<br>§ 63.6620(a)-Table 4.1.a.iii<br>§ 63.6620(b)<br>§ 63.6620(b)(2)<br>§ 63.6620(d)<br>§ 63.6620(e)(1)<br>[G]§ 63.6620(e)(2)<br>[G]§ 63.6625(b)<br>§ 63.6630(a)-Table 5.1.a.i<br>§ 63.6630(a)-Table 5.1.a.ii | § 63.6620(i)<br>§ 63.6630(a)-Table 5.1.a.iii<br>§ 63.6635(a)<br>§ 63.6635(c)<br>§ 63.6655(a)<br>§ 63.6655(a)(1)<br>§ 63.6655(a)(2)<br>§ 63.6655(a)(3)<br>§ 63.6655(a)(4)<br>§ 63.6655(a)(5)<br>[G]§ 63.6655(b)<br>§ 63.6655(d)<br>§ 63.6660(a)<br>§ 63.6660(b)<br>§ 63.6660(c) | § 63.6620(i)<br>§ 63.6630(c)<br>§ 63.6640(b)<br>§ 63.6640(e)<br>§ 63.6645(a)<br>§ 63.6645(c)<br>§ 63.6645(g)<br>§ 63.6645(h)<br>§ 63.6645(h)(2)<br>§ 63.6650(a)<br>§ 63.6650(a)-Table 7.1.a.i<br>§ 63.6650(a)-Table 7.1.b<br>§ 63.6650(a)-Table 7.1.c<br>§ 63.6650(b)<br>§ 63.6650(b)(1)<br>§ 63.6650(b)(2)<br>§ 63.6650(b)(3)<br>§ 63.6650(b)(4)<br>[G]§ 63.6650(c)<br>[G]§ 63.6650(e)<br>§ 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<br>(30 TAC § 122.144) | Reporting Requirements<br>(30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|--|--|--|
|                           |                         |               |           |                                       |   |   | § 63.6630(a)-Table 5.1.a.iii<br>§ 63.6635(a)<br>§ 63.6635(b)<br>§ 63.6640(a)<br>§ 63.6640(a)-Table 6.1.a.i<br>§ 63.6640(a)-Table 6.1.a.ii<br>§ 63.6640(a)-Table 6.1.a.iii<br>§ 63.6640(a)-Table 6.1.a.iv<br>§ 63.6640(a)-Table 6.1.a.v<br>§ 63.6640(b) |  |  |



**Additional Monitoring Requirements**

**Compliance Assurance Monitoring Summary ..... 17**

### CAM Summary

| Unit/Group/Process Information   |  |
|--|--|
| ID No.: GRPENG   |  |
| Control Device ID No.: OXCAT   | Control Device Type: Other control device type |
| Applicable Regulatory Requirement  |  |
| Name: 30 TAC Chapter 116, Standard Permits   | SOP Index No.: N/A                             |
| Pollutant: CO, FORMALDEHYDE  | Main Standard: 122107                          |
| Monitoring Information   |  |
| Indicator: Catalyst inlet temperature and pressure drop across catalyst  |  |
| Minimum Frequency: Once every 15 minutes for catalyst inlet temperature. Once per month for pressure drop readings.  |  |
| Averaging Period: 4-hour rolling average catalyst inlet temperature  |  |
| Deviation Limit: Maintain minimum catalyst inlet temperature and maintain pressure drop across catalyst established in performance test.   |  |
| <p>CAM Text: Monitor the catalyst inlet temperature and pressure drop across the catalyst. The permit holder shall calibrate, maintain, and operate instrumentation using procedures that take into account manufacturer's specifications.</p> <p>The catalyst inlet temperature and pressure drop readings must meet the range documented in the last successful performance test. Any monitoring data that exceeds the established deviation limits shall be considered and reported as a deviation.</p> |  |

**Permit Shield**

**Permit Shield ..... 19**

### Permit Shield

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

| Unit / Group / Process ID No. | Group / Inclusive Units                              | Regulation                                   | Basis of Determination  |
|-------------------------------|--|--|---|
| GLYC-TK-11                    | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK10                     | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK12                     | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK3                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK4                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK5                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK6                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK7                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK8                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK9                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GRPENG                        | ENGINE1, ENGINE2, ENGINE3, ENGINE4, ENGINE5, ENGINE6 | 30 TAC Chapter 117, Subchapter E, Division 1 | 30 TAC Chapter 117, Subchapter E, Division 1 does not apply in Colorado county. |
| LUBE-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| LUBE-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| UREA-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| UREA-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |

**New Source Review Authorization References**

|  |           |
|--|-----------|
| <b>New Source Review Authorization References .....</b>                  | <b>21</b> |
| <b>New Source Review Authorization References by Emission Unit .....</b> | <b>22</b> |

### 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.: 122107  | Issuance Date:               |
| Permits By Rule (30 TAC Chapter 106) for the Application Area  |                              |
| Number: 106.472  | Version No./Date: 09/04/2000 |
| Number: 106.511  | Version No./Date: 09/04/2000 |
| Number: 106.512  | 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** |
|---------------------------|--------------------------------|-----------------------------------|
| EMGEN                     | EMERGENCY GENERATOR            | 106.512/09/04/2000                |
| ENGINE1                   | ENGINE                         | 122107                            |
| ENGINE2                   | ENGINE                         | 122107                            |
| ENGINE3                   | ENGINE                         | 122107                            |
| ENGINE4                   | ENGINE                         | 122107                            |
| ENGINE5                   | ENGINE                         | 122107                            |
| ENGINE6                   | ENGINE                         | 122107                            |
| GLYC-TK-11                | STORAGE TANK                   | 122107                            |
| GLYC-TK1                  | STORAGE TANK                   | 122107                            |
| GLYC-TK10                 | STORAGE TANK                   | 122107                            |
| GLYC-TK12                 | STORAGE TANK                   | 122107                            |
| GLYC-TK2                  | STORAGE TANK                   | 122107                            |
| GLYC-TK3                  | STORAGE TANK                   | 122107                            |
| GLYC-TK4                  | STORAGE TANK                   | 122107                            |
| GLYC-TK5                  | STORAGE TANK                   | 122107                            |
| GLYC-TK6                  | STORAGE TANK                   | 122107                            |
| GLYC-TK7                  | STORAGE TANK                   | 122107                            |
| GLYC-TK8                  | STORAGE TANK                   | 122107                            |
| GLYC-TK9                  | STORAGE TANK                   | 122107                            |
| LUBE-TK1                  | STORAGE TANK                   | 122107                            |
| LUBE-TK2                  | STORAGE TANK                   | 122107                            |

### **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.

| <b>Unit/Group/Process<br/>ID No.</b> | <b>Emission Unit Name/Description</b> | <b>New Source Review Authorization**</b> |
|--------------------------------------|---------------------------------------|--|
| UREA-TK1                             | STORAGE TANK                          | 122107                                   |
| UREA-TK2                             | STORAGE TANK                          | 122107                                   |

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



**Appendix A**

**Acronym List ..... 25**

## Acronym List

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

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

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** Lance.Green@enlink.com  
**Cc:** Rhyan Stone  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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

**Table 1a: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date: 12/17/2024</b>                | <b>Regulated Entity No.: RN106160260</b>    | <b>Permit No.: O4537</b> |
| <b>Company Name: SWG Pipeline, LLC</b> | <b>Area Name: Ponder Compressor Station</b> |                          |

| <b>Revision No.</b> | <b>Unit/Group/Process ID No.</b> | <b>Unit/Group/Process Applicable Form</b> | <b>SOP/GOP Index No</b> | <b>Pollutant</b>          | <b>Applicable Regulatory Requirement Name</b> | <b>Applicable Regulatory Requirement Standard(s)</b>  |
|---------------------|----------------------------------|---|-------------------------|---------------------------|---|---|
| 1                   | EE-08                            | OP-UA2                                    | 63ZZZZ-2                | HAPS                      | 40 CFR Part 63, Subpart ZZZZ                  | §63.6590(c)   |
| 1                   | EE-08                            | OP-UA2                                    | 60JJJJ-2                | NO <sub>x</sub> , CO, VOC | 40 CFR Part 60, Subpart JJJJ                  | §60.4233(e)-Table 1<br>§60.4234<br>§60.4243(b)(2)(ii), (e), (g)<br>§60.4246   |
| 2                   | RECIP-08                         | OP-UA12                                   | 600000-3                | VOC                       | 40 CFR Part 60, Subpart OOOO                  | §60.5385(a)(1)<br>§60.5370(b)<br>§60.5385(a)<br>§60.5415(c)(3)-(4)<br>§60.5420(a)(1)  |
| 3                   | EE-01A                           | OP-UA2                                    | R117-1                  | NO <sub>x</sub> , CO      | Chapter 117                                   | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2), (c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3), (e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6), (b)(7)<br>§117.440(j) |

|   |        |        |        |         |             |  |
|---|--------|--------|--------|---------|-------------|--|
| 4 | EE-05A | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§117.440(j) |
| 5 | EE-07  | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§117.440(j) |
| 6 | EH-01  | OP-UA5 | R117-2 | NOx, CO | Chapter 117 | None [§117.403(a)(1)(B)]   |
| 7 | EH-02  | OP-UA5 | R117-3 | NOx, CO | Chapter 117 | §117.410(a)(3)(B)<br>§117.410(a), (b)(2), (c)(1)<br>§117.410(c)(1)(A)-(B), (c)(3)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(2)-(3), (b)(4)-(5)<br>§117.440(j)                                 |

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

**Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/17/2024                | <b>Regulated Entity No.:</b> RN106160260    | <b>Permit No.:</b> O4537 |
| <b>Company Name:</b> SWG Pipeline, LLC | <b>Area Name:</b> Ponder Compressor Station |                          |

| Revision No. | Unit/Group/Processes ID No. | SOP/GOP Index No. | Pollutant                 | Monitoring and Testing Requirements                  | Recordkeeping Requirements                              | Reporting Requirements               |
|--------------|-----------------------------|-------------------|---------------------------|--|---|--------------------------------------|
| 1            | EE-08                       | 63ZZZZ-2          | HAPS                      | None   | None  | None                                 |
| 1            | EE-08                       | 60JJJJ-2          | NO <sub>x</sub> , CO, VOC | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4244(a)-(d) | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4245(a)(1)-(4) | [G]§60.4245(c), (d)<br>§60.4245(d)   |
| 2            | RECIP-08                    | 60OOOO-3          | VOC                       | §60.5410(c)(1)<br>§60.5415(c)(1)                     | §60.5420(c), [G](c)(3)                                  | §60.5420(b), [G](b)(1),<br>[G](b)(4) |

|   |        |        |         |  |   |   |
|---|--------|--------|---------|--|---|---|
| 3 | EE-01A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3),<br>(c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-<br>(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A),<br>(b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I),<br>(b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-<br>(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|--------|--------|---------|--|---|---|



|   |        |        |         |  |   |   |
|---|--------|--------|---------|--|---|---|
| 4 | EE-05A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3),<br>(c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-<br>(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A),<br>(b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I),<br>(b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-<br>(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|--------|--------|---------|--|---|---|

|   |       |        |         |   |  |  |
|---|-------|--------|---------|---|--|--|
| 5 | EE-07 | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1), [G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c), [G](d), [G](e)<br>§117.8010, [G](1), (2), (2)(A)-(D)<br>[G]§117.8010(3), (4), [G](5)<br>§117.8010(6), [G](7)-(8)<br>§117.8100(c) |
| 6 | EH-01 | R117-2 | NOx, CO | None  | None   | None   |

|   |       |        |         |  |  |   |
|---|-------|--------|---------|--|--|---|
| 7 | EH-02 | R117-3 | NOx, CO | §117.435(a)(1), (a)(3), (b)-(e), (e)(3)<br>§117.440(a), (f), [G](g), (k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3)<br>§117.8000(c)(5)-(6), [G](d)<br>§117.8100(a), (a)(1), (a)(1)(A), (a)(1)(B)<br>§117.8100(a)(1)(B)(ii), (a)(1)(B)(iii),<br>(a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4), (a)(5)<br>§117.8100(a)(5)(A), (a)(5)(B),<br>[G](a)(5)(D)<br>[G]§117.8100(a)(5)(E), (a)(6), (b), (b)(1)<br>[G]§117.8100(b)(1)(A), (b)(1)(B), (b)(2),<br>(b)(3)<br>§117.8100(b)(3)(A), (b)(3)(B), (b)(4),<br>(b)(4)(A)<br>§117.8100(b)(4)(A)(i)(II),<br>(b)(4)(A)(i)(III)<br>[G]§117.8100(b)(4)(B), (b)(4)(C),<br>(b)(4)(C)(i)<br>§117.8100(b)(4)(C)(ii), (b)(4)(C)(iii)<br>§117.8100(b)(4)(C)(iii)(I),<br>(b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-)<br>§117.8100(b)(5), (b)(6) | §117.445(a), (f), (f)(1),<br>[G](f)(2), (f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|-------|--------|---------|--|--|---|



December 17, 2024

Submitted via STEERS

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

**RE: Site Operating Permit (SOP) Minor Revision Application  
Ponder Compressor Station, Denton County, Texas  
RN106160260  
CN604592279  
Account No.: DFA235A**

Dear APIRT,

SWG Pipeline, LLC (EnLink) is submitting this Title V Site Operating Permit (SOP) Minor Revision Application for the Ponder Compressor Station (Facility) in accordance with Title 30 of the Texas Administrative Code (TAC) Chapter 122. The Facility is currently authorized under Air Quality Standard Permit No.96573. Basic Facility info is as follows:

- Facility Type: Natural gas compression
- Facility Owner/Operator: SWG Pipeline, LLC
- Regulated Entity: RN106160260
- Customer Number: CN604592279
- Application Type: SOP Minor Revision

This full permit application contains an OP-1, OP-2, OP-PBR SUP, OP-SUMR, OP-UAs, and OP-REQ3.



1127 Judson Rd. Suite 233 – Longview, TX 75601  
[www.ResoluteCompliance.com](http://www.ResoluteCompliance.com)



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Any clarification questions or requests for additional information can be directed to myself via email to [jj@resolutecompliance.com](mailto:jj@resolutecompliance.com) or by phone at 903-707-8614 or Mr. Lance Green via email to [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com) or by phone at 225-692-6947.

Kind Regards,

A handwritten signature in black ink, appearing to read 'J. Jackson', with a stylized flourish at the end.

Jeff A. Jackson

Vice President EHSR

Encl: SOP Minor Revision Application

Cc: Benjamin Aucoin – SWG Pipeline, LLC  
Lance Green – SWG Pipeline, LLC

---

**RESOLUTE**  
COMPLIANCE, LLC

1127 Judson Rd. Suite 233 – Longview, TX 75601  
[www.ResoluteCompliance.com](http://www.ResoluteCompliance.com)



December 17, 2024

Submitted via STEERS

Ms. Kimberli Fowler  
Region 4 Air Section Manager  
Texas Commission On Environmental Quality  
2309 Gravel Dr.  
Fort Worth, TX 76118-6951

**RE: Site Operating Permit (SOP) Minor Revision Application  
Ponder Compressor Station, Denton County, Texas  
RN106160260  
CN604592279  
Account No.: DFA235A**

Dear Ms. Fowler,

Please find enclosed a copy of the Title V Site Operating Permit (SOP) Minor Revision Application submitted to the Texas Commission on Environmental Quality (TCEQ).

Any clarification questions or requests for additional information can be directed to myself via email to [jj@resolutecompliance.com](mailto:jj@resolutecompliance.com) or by phone at 903-707-8614 or Mr. Lance Green at [lance.green@enlink.com](mailto:lance.green@enlink.com) and 225-692-6947.

Kind Regards,

Jeff A. Jackson

Vice President EHSR

Encl: SOP Minor Revision Application

Cc: Benjamin Aucoin – SWG Pipeline, LLC  
Lance Green – SWG Pipeline, LLC

---

**RESOLUTE**  
COMPLIANCE, LLC

1127 Judson Rd. Suite 233 – Longview, TX 75601  
[www.ResoluteCompliance.com](http://www.ResoluteCompliance.com)



---

December 17, 2024

Environmental Protection Agency, Region 6  
Air Permits Section (ARPE)  
Renaissance Tower  
1201 Elm St., Suite 500  
Dallas, Texas 75270-2102

Delivered via Email to [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov)

**RE: Site Operating Permit (SOP) Minor Revision Application  
Ponder Compressor Station, Denton County, Texas  
RN106160260  
CN604592279  
Account No.: DFA235A**

Dear Air Permits Section,

Please find enclosed a copy of the Title V Site Operating Permit (SOP) Minor Revision Application submitted to the Texas Commission on Environmental Quality (TCEQ).

Any clarification questions or requests for additional information can be directed to myself via email to [jj@resolutecompliance.com](mailto:jj@resolutecompliance.com) or by phone at 903-707-8614 or Mr. Lance Green at [lance.green@enlink.com](mailto:lance.green@enlink.com) and 225-692-6947.

Kind Regards,

Jeff A. Jackson

Vice President EHSR

Encl: SOP Minor Revision Application

Cc: Benjamin Aucoin – SWG Pipeline, LLC  
Lance Green – SWG Pipeline, LLC

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**RESOLUTE**  
COMPLIANCE, LLC

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Federal Operating Permit Minor Revision Application

Site Operating Permit (SOP) O4537

Ponder Compressor Station

Denton County, Texas

SWG Pipeline, LLC

RN106160260

CN604592279

Date: December 17, 2024

Prepared by:

Jeff A. Jackson – Vice President EHSR

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# TABLE OF CONTENTS

|               |   |    |
|---------------|---|----|
| Section 1.0   | INTRODUCTION .....  | 5  |
|               | Forms.....  | 5  |
|               | Figures .....   | 5  |
| Section 2.0   | PROCESS DESCRIPTION.....  | 6  |
| Section 3.0   | CONSTRUCTION PERMIT AUTHORIZATIONS .....  | 7  |
| Section 4.0   | STATE AND FEDERAL REGULATORY SUMMARY .....  | 8  |
| Section 4.1   | State Regulatory Applicability .....  | 8  |
| Section 4.1.1 | Preconstruction Authorization.....  | 8  |
| Section 4.1.2 | 30 Texas Administrative Code (TAC) 101 Applicability .....  | 8  |
| Section 4.1.3 | 30 TAC 111 Applicability.....   | 8  |
| Section 4.1.4 | 30 TAC 115 Applicability.....   | 8  |
| Section 4.1.5 | 30 TAC 117 Applicability.....   | 9  |
| Section 4.1.6 | 30 TAC 122 Applicability.....   | 10 |
| Section 4.2   | Potentially Applicable Federal Regulations .....  | 13 |
| Section 4.2.1 | 40 CFR Part 60 Subpart A - General Provisions .....   | 13 |
| Section 4.2.2 | 40 CFR Part 60 Subpart K, Ka, Kb – Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) ..... | 13 |
| Section 4.2.3 | 40 CFR Part 60 Subpart KKK - Equipment Leaks of VOC From Onshore Natural Gas Processing Plants                                | 13 |
| Section 4.2.4 | 40 CFR Part 60 Subpart LLL - Standards of Performance for SO2 Emissions.....  | 13 |
| Section 4.2.5 | 40 CFR Part 60 Subpart IIII – Stationary Compression Ignition Internal Combustion Engine .....                                | 13 |

|                |  |    |
|----------------|--|----|
| Section 4.2.6  | 40 CFR Part 60 Subpart JJJJ - Stationary Spark Ignition Internal Combustion Engines .....                                | 13 |
| Section 4.2.7  | 40 CFR Part 60 Subpart OOOO - Crude Oil and Natural Gas Production, Transmission and Distribution.....                   | 14 |
| Section 4.2.8  | 40 CFR Part 60 Subpart OOOOa - Crude Oil and Natural Gas Facilities .....  | 14 |
| Section 4.2.9  | 40 CFR Part 60 Subpart OOOOb - Crude Oil and Natural Gas Facilities .....  | 15 |
| Section 4.2.10 | 40 CFR Part 61 Subpart A – General Provisions .....  | 15 |
| Section 4.2.11 | 40 CFR Part 63 Subpart A – General Provisions .....  | 15 |
| Section 4.2.12 | 40 CFR Part 63 Subpart HH - Oil and Natural Gas Production Facilities .....  | 16 |
| Section 4.2.13 | 40 CFR Part 63 Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines .....                                 | 16 |
| Section 4.2.14 | 40 CFR Part 63 Subpart DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters Major Sources ..... | 16 |
| Section 4.2.15 | 40 CFR Part 63 Subpart JJJJJ - Industrial, Commercial, and Institutional Boilers Area Sources .....                      | 16 |
| Section 4.2.16 | 40 CFR Part 64 Compliance Assurance Monitoring.....  | 16 |
| Section 4.2.17 | 40 CFR Part 68 Chemical Accident Prevention Provisions .....   | 16 |

## FORMS

## FIGURES

## ATTACHMENTS

## FORMS

## FIGURES

FIGURE 1 – AREA MAP

FIGURE 2 – PROCESS FLOW DIAGRAM

## ATTACHMENTS

ATTACHMENT A – CURRENT CONSTRUCTION AUTHORIZATION MAERT

## SECTION 1.0 INTRODUCTION

SWG Pipeline, LLC (EnLink) is seeking to authorize a Site Operating Permit (SOP) minor revision for the Ponder Compressor Station (Facility).

EnLink is submitting this SOP minor revision application to incorporate the following changes, which were authorized under Permit By Rule (PBR) 95673: add one (1) Caterpillar G3516 ULB engine (EE-08) and associated reciprocating compressor (RECIP-08).

A Maximum Allowable Emission Rate Table (MAERT) extracted from the most recent construction authorization for the Facility is provided in Attachment A.

The submittal includes all required forms, figures, and regulatory applicability information required for an SOP minor revision application. A summary of provided materials is as follows:

### FORMS

- OP-1 Site Information Summary
- OP-2 Application for Permit Revision/Renewal
- OP-PBRSUP Permits by Rule Supplemental Table
- OP-SUMR Individual Unit Summary for Revisions
- Applicable Unit Attribute (UA) Forms
  - OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes
  - OP-UA5 – Process Heater/Furnace Attributes
  - OP-UA12 – Fugitive Emission Unit Attributes
- OP-REQ3 Applicable Requirements Summary

### FIGURES

- Area Map
- Process Flow Diagram

The following sections provide a process description, a summary of pre-construction authorizations, and potentially applicable State and Federal Requirements in support of this application.

## SECTION 2.0      PROCESS DESCRIPTION

Produced natural gas and produced liquids enter the Facility via an inlet separator. Liquids from the inlet stream are routed to three (3) water/condensate storage tanks (Facility Identification Numbers [FINs] ET- 01, ET-02, and ET-03). The liquids collected in the storage tanks are periodically transported off-site via truck (FIN LL-01). From the inlet separator, natural gas is routed to one of four (4) compressor engines (FINs EE-01a, EE-05a, EE-07, and EE-08). The compressed gas is routed to the amine unit (FIN AMINE) for removal of carbon dioxide (CO<sub>2</sub>) from the inlet gas by bringing the gas into contact with an amine solution. The rich amine (CO<sub>2</sub> saturated) solution passes through a flash tank, where light-end volatile organic compounds (VOCs) flash-off from the solution. The rich amine solution is then heated in the amine reboiler (FIN EH-2) to release the absorbed CO<sub>2</sub>. The sweetened gas is routed to the dehydration unit (FIN DEHY-01) to remove water from the gas stream by bringing the gas into contact with glycol. The rich glycol (water saturated) is routed to a flash tank, where flash-off vapors are routed to the reboiler (FIN EH-01) fuel system for combustion. The rich glycol continues to the glycol regenerator, where water and other constituents are boiled off. Water vapor from the glycol regenerator is routed to a BTEX condenser, where condensed liquids are routed to the storage tanks and non-condensable vapors are routed to the reboiler as fuel. The dry gas resulting from the dehydration process is transported offsite via pipeline.

The Facility also includes VOC emissions from miscellaneous tanks (FINs ET-04, ET-05, ET-06, and ET-07), piping and fugitive components (FIN ESF-01), compressor blowdowns (FIN BD), engine starter vents (FIN SV), and maintenance operations (FIN MSS).

One compressor engine (FIN EE-02) has been certified as a zero-emission unit.

## SECTION 3.0 CONSTRUCTION PERMIT AUTHORIZATIONS

The Facility is authorized under Permit-By-Rule (PBR) Registration No. 96573 with the most recent certification on December 20, 2024. This single registration covers all emissions sources from routine operations and maintenance, startup, and shutdown (MSS) operations at the Facility.

There are no other active construction permit authorizations associated with the Facility.

## SECTION 4.0 STATE AND FEDERAL REGULATORY SUMMARY

The following sub sections provide a summary of State and Federal Regulatory applicability.

### SECTION 4.1 STATE REGULATORY APPLICABILITY

#### Section 4.1.1 Preconstruction Authorization

The Facility is authorized under PBR Registration No. 96573, issued on December 20, 2024. The Facility currently complies with the applicable terms and conditions of the PBR.

#### Section 4.1.2 30 Texas Administrative Code (TAC) 101 Applicability

The Facility is subject to the Emissions Inventory Requirements of 30 TAC §101.10 since it has a potential to emit greater than major source thresholds. Actual Facility emissions will be evaluated and reported as appropriate.

#### Section 4.1.3 30 TAC 111 Applicability

The Facility is subject to the visible emissions requirements of 30 TAC §111.111 and will not exceed the applicable opacity limits for each respective source.

#### Section 4.1.4 30 TAC 115 Applicability

The Facility is located in Denton County, which is currently classified as severe nonattainment for the 8-hour ozone standard.

Chapter 115, Subchapter B, Division 1 contains requirements for storage tanks in which volatile organic compounds (VOCs) are placed, stored, or held. The Facility storage vessels store VOCs with a true vapor pressure less than 1.5 pounds per square inch absolute (psia); therefore, they are exempt from the storage tank controls requirements in §115.111-119 per 30 TAC §115.111(a)(1).

Chapter 115, Subchapter B, Division 2 contains requirements for vent gas streams, including those from a glycol dehydrator still vent per §115.121(a)(1). Glycol dehydrator still vents are required to be controlled according to §115.122(a)(1). The still vent stream associated with DEHY-01 is routed to the glycol reboiler, as allowed in §115.122(a)(1)(C). EnLink will continue to maintain records of appropriate operating parameters in accordance with §115.126(1)(C).

Chapter 115, Subchapter B, Division 3 contains requirements for water separators. The Facility has separator(s) that separate material having a true vapor pressure of VOC less than 0.5 psia; therefore, the water separators are exempt from the requirements in §115.131-139 per 30 TAC §115.137(a)(2).

Chapter 115, Subchapter B, Division 7 contains requirements for various emission sources located at compressor stations including centrifugal compressors, reciprocating compressors, pneumatic controllers, and fugitive emission components. All fugitive components are subject to monitoring, recordkeeping, and requirements thereunder.

Chapter 115, Subchapter C, Division 1 contains requirements for loading and unloading of VOCs. The Facility loads and unloads VOCs with a true vapor pressure less than 0.5 psia; therefore, it is exempt from the requirements in §115.211-259, except for inspection and recordkeeping requirements, per 30 TAC §115.217(a)(1).

The Facility will maintain records sufficient to demonstrate continuous compliance with these exemptions. There are no other subject sources located at the Facility.

#### Section 4.1.5 30 TAC 117 Applicability

The Facility is located in Denton County and has nitrogen oxides (NO<sub>x</sub>) emissions of more than 25 tons per year (TPY). The Facility has not previously been classified as a major source under this regulation.

The Facility is in the geographic area of applicability and is a major source of NO<sub>x</sub> under this rule; therefore, it is subject to the requirements of §117.400-456. The Facility compressor engines are gas-fired lean-burn stationary reciprocating internal combustion engines placed into service on or after June 1, 2007; therefore, they are subject to the emissions specifications of 30 TAC §117.410(a)(4)(B)(ii)(II) and §117.410(c)(1).

The Facility amine reboiler has a maximum rated capacity of 9.87 MMBtu/hr; therefore, it is subject to the emission specifications of §117.410(a)(3)(B) and §117.410(c)(1). The Facility glycol reboiler has a maximum rated capacity of 2.00 MMBtu/hr; therefore, it is exempt from the emission specifications of §117.410(a)(3)(B) and §117.410(c)(1) per §117.403(a)(1)(B).



A summary of requirements per unit is as follows:

| EPN    | Source Description                  | Applicable Standard per 30 TAC §117  |
|--------|-------------------------------------|--|
| EE-01a | CAT G3606 TALE, 4SLB, 1775 HP       | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EE-02  | WAUK L7044GSI, 4SRB, 1680 HP        | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EE-05a | CAT G3516B, 4SLB, 1380 HP           | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EE-07  | CAT G3516B, 4SLB, 1380 HP           | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EE-08  | CAT G3516 ULB, 4SLB, 1380 HP        | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EH-02  | Amine Process Heater, 9.87 MMBtu/hr | 0.036 lb/MMBtu NOx; or<br>30 ppmv NOx at 3.0% O <sub>2</sub> , dry basis; and<br>40 ppmv CO at 3.0% O <sub>2</sub> , dry basis |

The Facility is in the geographic area of applicability and is not a minor source of NOx under this rule; therefore, it is not subject to the requirements of §117.2100-2145.

The Facility will comply with the monitoring and testing requirements of §117.8000-8140 and the compliance schedule and compliance flexibility requirements of §117.9000-9810, as applicable.

There are no other subject sources located at the Facility.

#### Section 4.1.6 30 TAC 122 Applicability

The Facility meets the definition of a “Major source” per 30 TAC §122.10 (13)(D)(iii) for sites in any ozone nonattainment area classified as “severe” with a potential to emit of 25 TPY or more of oxides of nitrogen (NOx). With this application, the Facility is applying for a Federal Operating Permit (FOP) minor revision.

#### **Compliance Assurance Monitoring (CAM) Applicability**

CAM is required for any air emission source operating under an SOP if the source meets all of the following criteria, as described in Title 30 TAC 122.604:

- 122.604(b)(1) - The emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement.
- 122.604(b)(2) - The emission unit uses a control device to achieve compliance with the emission limitation or standard.

- 122.604(b)(3) - The emission unit has pre-control device potential to emit greater than or equal to the amount in tons per year required for a site to be classified as a major source.

Even if the three criteria above are met, CAM does not apply to the following:

- 122.604(c)(1) - Emission limitations or standards proposed by the EPA after November 15, 1990, under FCAA, 111 (Standards of Performance for New Stationary Sources) or 112 (Hazardous Air Pollutants).
- 122.604(c)(2) - Emission limitations or standards under FCAA, Title VI (Stratospheric Ozone Protection).
- 122.604(c)(3) - Emission limitations or standards under FCAA, Title IV (Rain Program).
- 122.604(c)(4) - Emission limitations or standards that apply solely under an emissions trading program approved or promulgated by the EPA under the FCAA that allows for trading emissions.
- 122.604(c)(5) Emission caps that meet the requirements specified in 40 Code of Federal Regulations (CFR) 70.4(b)(12) (State Program Submittals and Transition).
- 122.604(c)(6) - Emission limitations or standards for which an applicable requirement specifies a continuous compliance determination method, unless the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device.
- 122.604(c)(7) - Other emission limitations or standards specified as exempt by the EPA.

The Facility is not subject to the CAM requirements of §122.604 as follows:

1. E-01a – pre-control device CO emissions are less than major source levels – not subject.
2. EE-02 – pre-control device CO emissions are more than major source levels, however this unit certified for zero (0) emissions annually – not subject.
3. EE-05a, EE-07, and EE-08 – pre-control device CO emissions from each unit are more than major source levels, however each engine is subject to NSPS JJJJ – not subject.
4. DEHY-01 – Still vent emissions are reduced by BTEX condenser and reboiler (fuel line and glowplug backup). Flash tank emissions are recycled to the process. The definition of “control device” in MACT HH states that injecting vapor into the flame zone of an enclosed combustion device and/or returning the vapor back to the process is not considered to be a “control device.” Emissions of VOC and benzene after reductions are less than major source levels – not subject.

#### **PM Applicability**

PM applies to an emission unit at a site provided the emission unit is subject to an emission limitation or standard in an applicable requirement, as described in Title 30 TAC 122.604. PM does not apply to emission limitations or standards where the applicable requirement includes sufficient monitoring that will provide reliable data for the relevant time period associated

with compliance with the applicable requirement, as described in Title 30 TAC 122.602(b). Emissions limitations or standards that do not require PM include, but are not limited to, the following:

- 122.602(b)(1) - Emission limitations or standards proposed by the EPA after November 15, 1990 under FCAA, 111 (Standards of Performance for New Stationary Sources) or 112 (Hazardous Air Pollutants).
- 122.602(b)(2) - Emission limitations or standards under FCAA, Title IV (the Acid Rain Program).
- 122.602(b)(3) - Emission limitations or standards for which an applicable requirement specifies a continuous compliance determination method, unless the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device.
- 122.602(b)(4) - Other emission limitations or standards specified as exempt by the EPA.

There are no applicable sources at the Facility.

## SECTION 4.2 POTENTIALLY APPLICABLE FEDERAL REGULATIONS

### Section 4.2.1 40 CFR Part 60 Subpart A - General Provisions

The General Provisions of the New Source Performance Standards (NSPS) apply to all sources with applicable NSPS Subparts and detail the general notification, recordkeeping, testing, monitoring, and reporting requirements that are common to affected NSPS sources. Individual NSPS Subparts detail the specific applicability of the Subpart A General Provisions.

Specific control device requirements pertaining to flares are detailed in 40 CFR §60.18(b), however, there are no flares operated at the Facility.

### Section 4.2.2 40 CFR Part 60 Subpart K, Ka, Kb – Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)

The Facility storage tanks ET-01 – ET-03 are not subject to 40 CFR Part 60 Subparts K, Ka, or Kb. The tanks were constructed after the applicable date of Subpart Kb, but each has a storage capacity less than 75 m<sup>3</sup> (~472-bbl); therefore, they are exempt per §60.110b(a).

### Section 4.2.3 40 CFR Part 60 Subpart KKK - Equipment Leaks of VOC From Onshore Natural Gas Processing Plants

Fugitive equipment leaks at the Facility are not subject to this Subpart since the Facility is not a natural gas processing plant.

### Section 4.2.4 40 CFR Part 60 Subpart LLL - Standards of Performance for SO<sub>2</sub> Emissions

The sweetening unit (AMINE) was constructed after August 23, 2011; therefore, is not subject to this subpart.

### Section 4.2.5 40 CFR Part 60 Subpart IIII – Stationary Compression Ignition Internal Combustion Engine

There are no compression ignition engines at the Facility.

### Section 4.2.6 40 CFR Part 60 Subpart JJJJ - Stationary Spark Ignition Internal Combustion Engines

The operational reciprocating internal combustion engines at the Facility (EE-01a, EE-05a, EE-07, EE-08) are lean-burn engine and they each have a horsepower (hp) rating greater than 1,350-hp. EE-01a was manufactured March 3, 2006 (prior to July 1, 2007); therefore, it is not subject to this Subpart. EE-05a was manufactured on October 3, 2007 (between July 1, 2007 and July 1, 2010); therefore, it is subject to the stage 1 emission limits of this Subpart. EE-07 was manufactured on June 1, 2006 (before July 1, 2007) but was modified and is subject to the stage 1 emission limits of this Subpart. EE-08 was manufactured on

December 1, 2014 (after July 1, 2010); therefore, it is subject to stage 2 emission limits of this Subpart. EnLink will comply with all applicable requirements.

#### Section 4.2.7 40 CFR Part 60 Subpart OOOO - Crude Oil and Natural Gas Production, Transmission and Distribution

The Facility was modified after August 23, 2011, and is therefore potentially subject to this Subpart.

The Facility is not a well site or a gas plant and there are no centrifugal compressors at the Facility.

The reciprocating compressors associated with EE-01a and EE-07 were manufactured between March 2006 and February 2007 (before August 23, 2011); therefore, they are not subject to this Subpart. The reciprocating compressor associated with EE-05a was manufactured in March 2017 (after September 18, 2015); therefore, it is not subject to this Subpart. The reciprocating compressor associated with EE-08 was manufactured in February 2014 (after August 23, 2011 and before September 18, 2015); therefore, it is subject to this Subpart.

Pneumatic controllers were constructed before August 23, 2011; therefore, they are not subject to this subpart.

The storage vessels at the Facility were constructed prior to August 23, 2011; therefore, they are not subject to this Subpart.

#### Section 4.2.8 40 CFR Part 60 Subpart OOOOa - Crude Oil and Natural Gas Facilities

The Facility is not a well site or a gas plant and there are no centrifugal compressors at the Facility.

The reciprocating compressors associated with EE-01a, EE-07 were manufactured between March 2006 and February 2007 (before September 18, 2015); therefore, they are not subject to this Subpart. The reciprocating compressor associated with EE-05a was manufactured in March 2017 (after September 18, 2015); therefore, it is subject to this Subpart.

The sweetening unit (AMINE) was constructed after September 18, 2015 and does not produce more than two (2) long tons per day of H<sub>2</sub>S and will maintain records in accordance with this rule.

Pneumatic controllers were constructed before September 18, 2015; therefore, they are not subject to this subpart.

The storage vessels at the Facility were constructed prior to September 18, 2015; therefore, they are not subject to this Subpart.

The Facility was constructed prior to September 18, 2015; therefore, fugitives are not subject to this Subpart.

#### Section 4.2.9 40 CFR Part 60 Subpart OOOOb - Crude Oil and Natural Gas Facilities

The Facility is not a well site or a gas plant and there are no centrifugal compressors at the Facility.

The reciprocating compressors associated with EE-01a, EE-07, EE-05a, and EE-08 were manufactured before December 6, 2022; therefore, they are not subject to this Subpart.

The sweetening unit (AMINE) was constructed before December 6, 2022 and does not produce more than two (2) long tons per day of H<sub>2</sub>S and will maintain records in accordance with this rule.

Pneumatic controllers added with this Project may be subject to this Subpart and will comply with applicable requirements in §60.5390b. The Facility will convert to instrument air; process controllers that are not driven by natural gas are not included in the affected Facility per §60.5365b(d) and will no longer be subject to the requirements of §60.5390b.

The storage vessels at the Facility were constructed before December 6, 2022; therefore, they are not subject to this Subpart.

The Facility was constructed before December 6, 2022; however, the addition of EE-08 constitutes a modification to the Facility. Therefore, fugitives are subject to this Subpart and will comply with applicable requirements in §60.5397b. At this time, there are no active SOP forms for Subpart OOOOb.

#### Section 4.2.10 40 CFR Part 61 Subpart A – General Provisions

The Facility does not operate any sources subject to the National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 61.

#### Section 4.2.11 40 CFR Part 63 Subpart A – General Provisions

The General Provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) apply to all sources with applicable NESHAP Subparts and detail the general notification, recordkeeping, testing, monitoring, and reporting requirements that are common to affected NESHAP sources. Individual NESHAP Subparts detail the specific applicability of the Subpart A General Provisions.

Specific control device requirements pertaining to flares are detailed in 40 CFR §63.11(b), however, there are no flares operated at the Facility.

#### Section 4.2.12 40 CFR Part 63 Subpart HH - Oil and Natural Gas Production Facilities

The Facility is an area source of Hazardous Air Pollutants (HAP) and it operates a triethylene glycol (TEG) dehydration unit with benzene emissions less than 1 TPY; therefore, it is subject to the recordkeeping provisions of §63.774 in this Subpart.

#### Section 4.2.13 40 CFR Part 63 Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines

The Facility operates reciprocating internal combustion engines (EE-01a, EE-05a, EE-07, EE-08) that are subject to this Subpart. EE-01a was manufactured prior to June 12, 2006, is considered an existing RICE at an area source, and will continue to comply with the requirements of this rule. EE-05a, EE-07, and EE-08 are subject to NSPS Subpart JJJJ and will comply with this Subpart through compliance with NSPS Subpart JJJJ.

#### Section 4.2.14 40 CFR Part 63 Subpart DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters Major Sources

The Facility is a minor source of HAPs and does not operate applicable units subject to this Subpart.

#### Section 4.2.15 40 CFR Part 63 Subpart JJJJJ - Industrial, Commercial, and Institutional Boilers Area Sources

The Facility is an area source of HAPs but does not operate applicable units subject to this Subpart.

#### Section 4.2.16 40 CFR Part 64 Compliance Assurance Monitoring

The Facility is subject to the CAM requirements as discussed in the 30 TAC 122 applicability section above.

#### Section 4.2.17 40 CFR Part 68 Chemical Accident Prevention Provisions

The Facility is not subject to the Chemical Accident Prevention Provisions of 40 CFR Part 68 as the Facility does not contain more than a threshold quantity of a regulated substance in a process.

**FORMS**



- OP-1 Site Information Summary
- OP-2 Application for Permit Revision/Renewal
- OP-PBRSUP Permits by Rule Supplemental Table
- OP-SUMR Individual Unit Summary for Revisions
- Applicable Unit Attribute (UA) Forms
  - OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes
  - OP-UA5 – Process Heater/Furnace Attributes
  - OP-UA12 – Fugitive Emission Unit Attributes
- OP-REQ3 Applicable Requirements Summary

# FORM LIST

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

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

|   |
|---|
| <b>I. Company Identifying Information</b>   |
| <b>A.</b> Company Name: SWG Pipeline, LLC   |
| <b>B.</b> Customer Reference Number (CN): <b>CN604592279</b>  |
| <b>C.</b> Submittal Date (mm/dd/yyyy): 12/18/2024   |
| <b>II. Site Information</b>   |
| <b>A.</b> Site Name: Ponder Compressor Station  |
| <b>B.</b> Regulated Entity Reference Number (RN): <b>RN106160260</b>  |
| <b>C.</b> Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>   |
| <input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input checked="" type="checkbox"/> OK <input type="checkbox"/> N/A   |
| <b>D.</b> Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br><i>(Check the appropriate box[es].)</i>  |
| <input type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> HAPS |
| Other:  |
| <b>E.</b> Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>F.</b> Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>G.</b> Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| <b>H.</b> Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:   |
| <b>III. Permit Type</b>   |
| <b>A.</b> Type of Permit Requested: <i>(Select only one response)</i>   |
| <input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)   |

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

|  |
|--|
| <b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>   |
| <b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>  |
| <b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> |
| <b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |
| <b>V. Confidential Information</b>   |
| <b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| <b>VI. Responsible Official (RO) Identifying Information</b>   |
| RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| RO Full Name: Timothy Patton Copeland II   |
| RO Title: Director of Operations   |
| Employer Name: SWG Pipeline, LLC   |
| Mailing Address: 415 Private Road 3502   |
| City: Bridgeport   |
| State: TX  |
| ZIP Code: 76426  |
| Territory:   |
| Country: United States   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (940) 683-1121  |
| Fax No.:   |
| Email: Patton.Copeland@enlink.com  |

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

|   |
|---|
| <b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>   |
| Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| Technical Contact Full Name: Lance Green  |
| Technical Contact Title: Lead Environmental Permitting Specialist   |
| Employer Name: SWG Pipeline, LLC  |
| Mailing Address: 60985 Derrick Rd   |
| City: Plaquemine  |
| State: LA   |
| ZIP Code: 70764   |
| Territory:  |
| Country: United States  |
| Foreign Postal Code:  |
| Internal Mail Code:   |
| Telephone No.: (225) 692-6947   |
| Fax No.:  |
| Email: Lance.Green@enlink.com   |
| <b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>   |
| <b>A.</b> State Senator: Tan Parker   |
| <b>B.</b> State Representative: Lynn Stuckey  |
| <b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span> |
| <b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish  |

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

|   |
|---|
| <b>IX. Off-Site Permit Request</b><br><i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>                            |
| <b>A.</b> Office/Facility Name: Bridgeport Gas Plant  |
| <b>B.</b> Physical Address: 415 Private Road 3502   |
| City: Bridgeport  |
| State: TX   |
| ZIP Code: 76426   |
| Territory:  |
| Country:  |
| Foreign Postal Code:  |
| <b>C.</b> Physical Location:  |
|   |
|   |
|   |
| <b>D.</b> Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) |
| Contact Full Name: Benjamin Aucoin  |
| <b>E.</b> Telephone No.: (469) 308-6204   |
| <b>X. Application Area Information</b>  |
| <b>A.</b> Area Name: Ponder Compressor Station  |
| <b>B.</b> Physical Address: 4045 Florence Rd  |
| City: Ponder  |
| State: TX   |
| ZIP Code: 76259   |
| <b>C.</b> Physical Location:  |
|   |
|   |
|   |
| <b>D.</b> Nearest City: Ponder  |
| <b>E.</b> State: TX   |
| <b>F.</b> ZIP Code: 76259   |

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

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|--|
| <b>X. Application Area Information (continued)</b>   |
| <b>G.</b> Latitude (nearest second): 33° 9' 21" N  |
| <b>H.</b> Longitude (nearest second): 97° 15' 28' W  |
| <b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> |
| <b>J.</b> Indicate the estimated number of emission units in the application area:   |
| <b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):  |
| <b>XI. Public Notice</b><br><i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>  |
| <b>A.</b> Name of a public place to view application and draft permit: Betty Foster Public Library   |
| <b>B.</b> Physical Address: 405 Shaffner St  |
| City: Ponder   |
| ZIP Code: 76259  |
| <b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):  |
| Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):   |
| Contact Person Full Name: Lance Green  |
| Contact Mailing Address: 60985 Derrick Rd  |
| City: Plaquemine   |
| State: LA  |
| ZIP Code: 70764  |
| Territory:   |
| Country:   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (225) 692-6947  |

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

**XII. Delinquent Fees and Penalties**

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

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

**XIII. Designated Representative (DR) Identifying Information**

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

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

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

**XIV. Alternate Designated Representative (ADR) Identifying Information**

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:



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

|  |   |
|--|---|
| Date: 12/17/2024   |   |
| Permit No.: O4537  |   |
| Regulated Entity No.: RN106160260  |   |
| Company Name: SWG Pipeline, LLC  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input type="checkbox"/> YES <input checked="" 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   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**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.

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

|                                   |
|-----------------------------------|
| Date: 12/17/2024                  |
| Permit No.: O4537                 |
| Regulated Entity No.: RN106160260 |
| Company Name: SWG Pipeline, LLC   |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | EE-08      | OP-UA2          | 96573                | Add engine.   |
| 2            | MS-A          | YES      | RECIP-08   | OP-UA12         | 96573                | Add reciprocating compressor.                                 |
| 3            | MS-A          | NO       | EE-01A     | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 4            | MS-A          | NO       | EE-05A     | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 5            | MS-A          | NO       | EE-07      | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 6            | MS-A          | NO       | EH-01      | OP-UA5          | 96573                | No change – Demonstrate 30 TAC 117 non-applicability.         |
| 7            | MS-A          | NO       | EH-02      | OP-UA5          | 96573                | Add 30 TAC 117 applicability.                                 |
|              |               |          |            |                 |                      |   |
|              |               |          |            |                 |                      |   |
|              |               |          |            |                 |                      |   |

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3  
Texas Commission on Environmental Quality**

|   |   |
|---|---|
| Date: 12/17/2024  |   |
| Permit No.: O4537   |   |
| Regulated Entity No.: RN106160260   |   |
| Company Name: SWG Pipeline, LLC   |   |
| <b>I. Significant Revision</b> <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i> |   |
| A.  | Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>                 |
| B.  | Indicate the alternate language(s) in which public notice is required:  |
| C.  | Will, there be a change in air pollutant emissions as a result of the significant revision? <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 3  
Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

| Pollutant | Description of the Change in Pollutant Emissions |
|-----------|--|
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
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|           |  |
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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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | Registration No. | PBR No.                | Registration Date |
|-------------|------------------|------------------------|-------------------|
| EE-08       | 96573            | 106.512                | 12/20/2024        |
| RECIP-08    | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
| EH-01       | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
| EH-02       | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
|             |                  |                        |                   |
|             |                  |                        |                   |
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|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| N/A         |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| PBR No. | Version No./Date |
|---------|------------------|
| N/A     |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |



**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No.       | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------------|--------------------------------------|---|
| EE-08       | 106.512       | 06/13/2001                           | Measure NOx and CO no later than 7 days after each occurrence of engine maintenance which may reasonably be expected to increase emissions, changes of fuel quality in engines without oxygen sensor-based AFFR controllers which may reasonably be expected to increase emissions, oxygen sensor replacement, or catalyst cleaning or catalyst replacement, per 106.512(2)(C)(ii).   |
| RECIP-08    | 106.352 (a-k) | 11/22/2012                           | A record of the date each quarterly inspection was made and the date that components were found leaking and when repaired or the date of the next planned shutdown.   |
| EH-01       | 106.352 (a-k) | 11/22/2012                           | Records of the hours of operation of every combustion device of any size by the use of a process monitor such as a run time meter, fuel flow meter, or other process variable that indicates a unit is running unless, in the registration for the facility, the emissions from the facility were calculated using full-year operation at maximum design capacity in which case no hours of operation records must be kept. |

|       |               |            |   |
|-------|---------------|------------|---|
| EH-02 | 106.352 (a-k) | 11/22/2012 | Records of the hours of operation of every combustion device of any size by the use of a process monitor such as a run time meter, fuel flow meter, or other process variable that indicates a unit is running unless, in the registration for the facility, the emissions from the facility were calculated using full-year operation at maximum design capacity in which case no hours of operation records must be kept. |
|       |               |            |   |
|       |               |            |   |
|       |               |            |   |
|       |               |            |   |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID<br>No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations 30 TAC<br>Chapter 116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|------------------------|------------------------------------|--------------------------------|---------------------|--|---|
| A                  | 1                            | EE-08                  | OP-UA2                             | Compressor Engine 8            |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 2                            | RECIP-08               | OP-UA12                            | Reciprocating Compressor 8     |                     | 106.352/12/20/2024[96573]  |   |
| A                  | 3                            | EE-01A                 | OP-UA2                             | Compressor Engine 1A           |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 4                            | EE-05A                 | OP-UA2                             | Compressor Engine 5A           |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 5                            | EE-07                  | OP-UA2                             | Compressor Engine 7            |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 6                            | EH-01                  | OP-UA5                             | Glycol Reboiler                |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 7                            | EH-02                  | OP-UA5                             | Amine Reboiler                 |                     | 106.512/12/20/2024[96573]  |   |
|                    |                              |                        |                                    |                                |                     |  |   |
|                    |                              |                        |                                    |                                |                     |  |   |
|                    |                              |                        |                                    |                                |                     |  |   |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------|-----------------------------|------------------------------------|-----------------|------------|-------------|-----------------------------|------------------|
| EE-01a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-05a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-07       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-08       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------------------------|-------------|--------------------------|---------------------|----------------------------------|---------------------------|-----------------------------------|
| EE-01a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-05a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-07       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-08       | R117-1            | 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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|----------------------|------------------------|---------------------|----------------------|-------------------------------------|----------------------------|
| EE-01a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-05a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-07       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-08       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | HAP Source | Brake HP | Construction/<br>Reconstruction<br>Date | Nonindustrial<br>Emergency<br>Engine | Service Type | Stationary RICE<br>Type |
|-------------|-------------------|------------|----------|---|--------------------------------------|--------------|-------------------------|
| EE-08       | 63ZZZZ-2          | AREA       | 500+     | 06+                                     |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |

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

**Federal Operating Permit Program**

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

**Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Construction/<br>Reconstruction/<br>Modification Date | Test Cell | Exemption | Temp<br>Replacement | Horsepower | Fuel   | AEL<br>No. | Lean<br>Burn | Commencing |
|-------------|----------------------|---|-----------|-----------|---------------------|------------|--------|------------|--------------|------------|
| EE-08       | 60JJJJ-2             | YES   | NO        | NONE      | NO                  | 1350+      | NATGAS |            |              | CON        |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |



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

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Manufacture<br>Date | Displacement | Certified | Operation | Certified<br>Modification | Service | Severe Duty | Optional<br>Compliance |
|-------------|----------------------|---------------------|--------------|-----------|-----------|---------------------------|---------|-------------|------------------------|
| EE-08       | 60JJJJ-2             | N0710+              |              | NO        |           |                           | NON     |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |

Process Heater/Furnace Attributes  
Form OP-UA5 (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, Process Heaters  
Texas Commission on Environmental Quality

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Unit Type | Maximum<br>Rated<br>Capacity | RACT<br>Date<br>Placed in<br>Service | Functionally<br>Identical<br>Replacement | Fuel Type(s) |  |  | Annual<br>Heat<br>Input | NOx<br>Emission<br>Limitation | Opt-In<br>Unit | 23C-Option |
|-------------|----------------------|-----------|------------------------------|--------------------------------------|--|--------------|--|--|-------------------------|-------------------------------|----------------|------------|
| EH-01       | R117-2               | PRHTR     | 5-                           |                                      |  |              |  |  |                         |                               |                |            |
| EH-02       | R117-3               | PRHTR     | 5-40                         |                                      |  | NG           |  |  |                         | 410A                          |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |

**Process Heater/Furnace Attributes**  
**Form OP-UA5 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 117)**  
**Subchapter B: Combustion Control at Major Industrial, Commercial, and**  
**Institutional Sources in Ozone Nonattainment Areas, Process Heaters**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Diluent CEMS | 30 TAC Chapter 116 Limit | NOx Emission Limit Basis | NOx Reduction | Common Stack Combined | Fuel Type Heat Input | NOx Monitoring System |
|-------------|-------------------|--------------|--------------------------|--------------------------|---------------|-----------------------|----------------------|-----------------------|
| EH-02       | R117-3            | NO           |                          | OTHER                    | NONE          |                       |                      | MERT                  |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
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|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |

Process Heater/Furnace Attributes

Form OP-UA5 (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, Process Heaters

Texas Commission on Environmental Quality

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Fuel Flow Monitoring | CO Emission Limitation | CO Monitoring System | NH3 Emission Limitation | NH3 Monitoring |
|-------------|-------------------|----------------------|------------------------|----------------------|-------------------------|----------------|
| EH-02       | R117-3            | X40A                 | 410C                   | OTHER                |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
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|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |

**Fugitive Emission Unit Attributes**

**Form OP-UA12 (Page 170)**

**Federal Operating Permit Program**

**Table 19b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction**

**Commenced After September 18, 2015**

**Texas Commission on Environmental Quality**

| <b>Date</b> | <b>Permit No.</b> | <b>Regulated Entity No.</b> |
|-------------|-------------------|-----------------------------|
| 12/17/2024  | O4537             | RN106160260                 |

| <b>Unit ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Construction/Modification Date</b> | <b>Reciprocating Compressor</b> | <b>AMEL</b> | <b>Bypass Device</b> |
|--------------------|--------------------------|---------------------------------------|---------------------------------|-------------|----------------------|
| RECIP-08           | 60OOOOa-2                | 15-                                   |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |

**Fugitive Emission Unit Attributes  
Form OP-UA12 (Page 186)  
Federal Operating Permit Program**

**Table 20b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction,  
Modification or Reconstruction Commenced After August 23, 2011 and on or before September 18, 2015  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID. No. | SOP/GOP Index No. | Construction/<br>Modification Date | Reciprocating Compressor | Bypass Device |
|--------------|-------------------|------------------------------------|--------------------------|---------------|
| RECIP-08     | 600000-3          | 11-15                              | RC26K-                   |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |

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

**Table 1a: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date: 12/17/2024</b>                | <b>Regulated Entity No.: RN106160260</b>    | <b>Permit No.: O4537</b> |
| <b>Company Name: SWG Pipeline, LLC</b> | <b>Area Name: Ponder Compressor Station</b> |                          |

| Revision No. | Unit/Group/Process ID No. | Unit/Group/Process Applicable Form | SOP/GOP Index No | Pollutant                 | Applicable Regulatory Requirement Name | Applicable Regulatory Requirement Standard(s)   |
|--------------|---------------------------|------------------------------------|------------------|---------------------------|--|---|
| 1            | EE-08                     | OP-UA2                             | 63ZZZZ-2         | HAPS                      | 40 CFR Part 63, Subpart ZZZZ           | §63.6590(c)   |
| 1            | EE-08                     | OP-UA2                             | 60JJJJ-2         | NO <sub>x</sub> , CO, VOC | 40 CFR Part 60, Subpart JJJJ           | §60.4233(e)-Table 1<br>§60.4234<br>§60.4243(b)(2)(ii), (e), (g)<br>§60.4246   |
| 2            | RECIP-08                  | OP-UA12                            | 600000-3         | VOC                       | 40 CFR Part 60, Subpart OOOO           | §60.5385(a)(1)<br>§60.5370(b)<br>§60.5385(a)<br>§60.5415(c)(3)-(4)<br>§60.5420(a)(1)  |
| 3            | EE-01A                    | OP-UA2                             | R117-1           | NO <sub>x</sub> , CO      | Chapter 117                            | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2), (c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3), (e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6), (b)(7)<br>§117.440(j) |

|   |        |        |        |         |             |  |
|---|--------|--------|--------|---------|-------------|--|
| 4 | EE-05A | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§117.440(j) |
| 5 | EE-07  | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§117.440(j) |
| 6 | EH-01  | OP-UA5 | R117-2 | NOx, CO | Chapter 117 | None [§117.403(a)(1)(B)]   |
| 7 | EH-02  | OP-UA5 | R117-3 | NOx, CO | Chapter 117 | §117.410(a)(3)(B)<br>§117.410(a), (b)(2), (c)(1)<br>§117.410(c)(1)(A)-(B), (c)(3)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(2)-(3), (b)(4)-(5)<br>§117.440(j)                                 |



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

**Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/17/2024                | <b>Regulated Entity No.:</b> RN106160260    | <b>Permit No.:</b> O4537 |
| <b>Company Name:</b> SWG Pipeline, LLC | <b>Area Name:</b> Ponder Compressor Station |                          |

| Revision No. | Unit/Group/Processes ID No. | SOP/GOP Index No. | Pollutant                 | Monitoring and Testing Requirements                  | Recordkeeping Requirements                              | Reporting Requirements             |
|--------------|-----------------------------|-------------------|---------------------------|--|---|------------------------------------|
| 1            | EE-08                       | 63ZZZZ-2          | HAPS                      | None   | None  | None                               |
| 1            | EE-08                       | 60JJJJ-2          | NO <sub>x</sub> , CO, VOC | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4244(a)-(d) | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4245(a)(1)-(4) | [G]§60.4245(c), (d)<br>§60.4245(d) |
| 2            | RECIP-08                    | 60OOOO-3          | VOC                       | §60.5410(c)(1)<br>§60.5415(c)(1)                     | §60.5420(c), [G](c)(3)                                  | §60.5420(b), [G](b)(1), [G](b)(4)  |

|   |        |        |         |   |  |  |
|---|--------|--------|---------|---|--|--|
| 3 | EE-01A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1), [G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c), [G](d), [G](e)<br>§117.8010, [G](1), (2), (2)(A)-(D)<br>[G]§117.8010(3), (4), [G](5)<br>§117.8010(6), [G](7)-(8)<br>§117.8100(c) |
|---|--------|--------|---------|---|--|--|

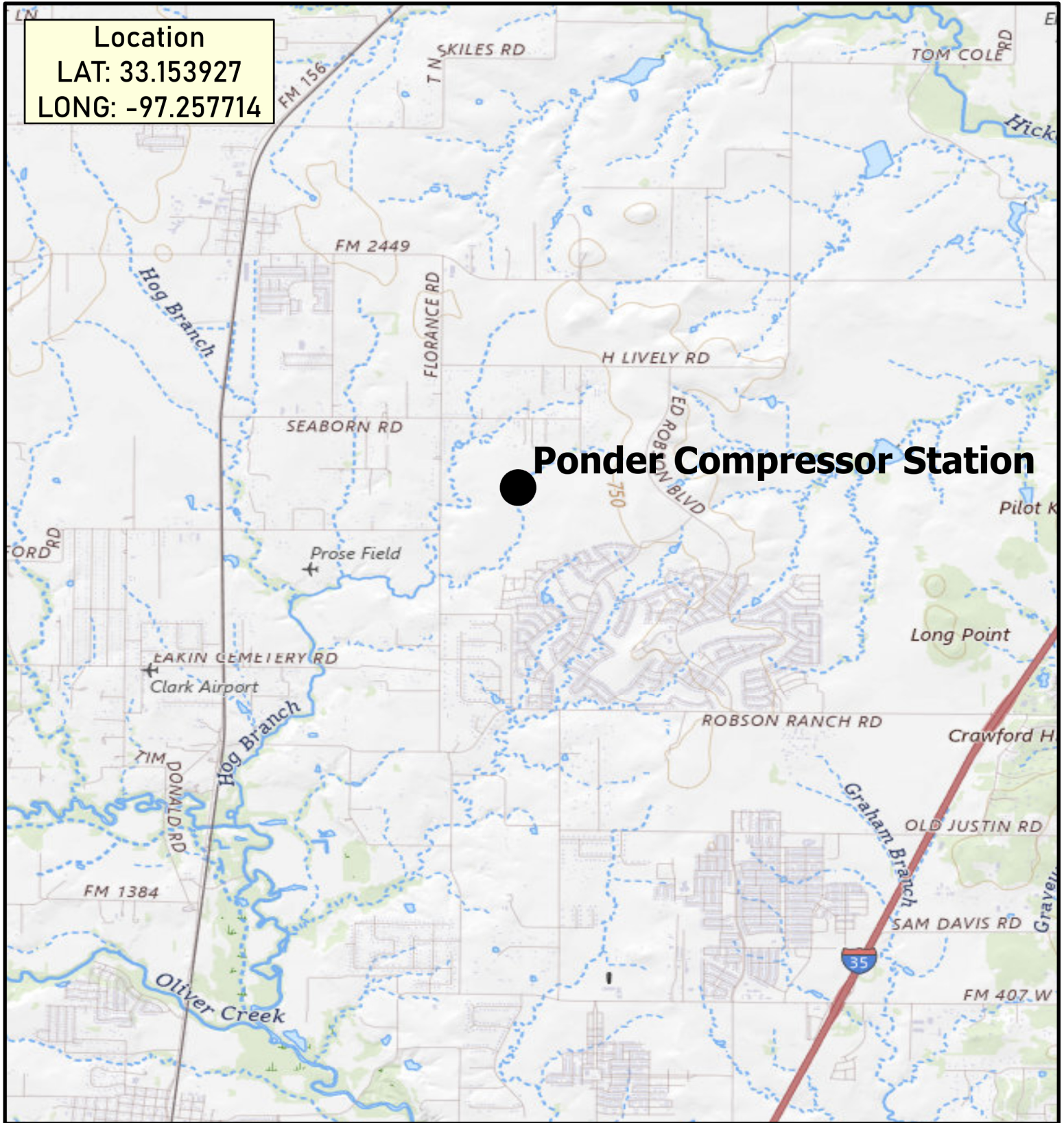
|   |        |        |         |   |  |  |
|---|--------|--------|---------|---|--|--|
| 4 | EE-05A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1), [G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c), [G](d), [G](e)<br>§117.8010, [G](1), (2), (2)(A)-(D)<br>[G]§117.8010(3), (4), [G](5)<br>§117.8010(6), [G](7)-(8)<br>§117.8100(c) |
|---|--------|--------|---------|---|--|--|

|   |       |        |                      |   |  |  |
|---|-------|--------|----------------------|---|--|--|
| 5 | EE-07 | R117-1 | NO <sub>x</sub> , CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1), [G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c), [G](d), [G](e)<br>§117.8010, [G](1), (2), (2)(A)-(D)<br>[G]§117.8010(3), (4), [G](5)<br>§117.8010(6), [G](7)-(8)<br>§117.8100(c) |
| 6 | EH-01 | R117-2 | NO <sub>x</sub> , CO | None  | None   | None   |

|   |       |        |         |  |  |   |
|---|-------|--------|---------|--|--|---|
| 7 | EH-02 | R117-3 | NOx, CO | §117.435(a)(1), (a)(3), (b)-(e), (e)(3)<br>§117.440(a), (f), [G](g), (k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3)<br>§117.8000(c)(5)-(6), [G](d)<br>§117.8100(a), (a)(1), (a)(1)(A), (a)(1)(B)<br>§117.8100(a)(1)(B)(ii), (a)(1)(B)(iii),<br>(a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4), (a)(5)<br>§117.8100(a)(5)(A), (a)(5)(B),<br>[G](a)(5)(D)<br>[G]§117.8100(a)(5)(E), (a)(6), (b), (b)(1)<br>[G]§117.8100(b)(1)(A), (b)(1)(B), (b)(2),<br>(b)(3)<br>§117.8100(b)(3)(A), (b)(3)(B), (b)(4),<br>(b)(4)(A)<br>§117.8100(b)(4)(A)(i)(II),<br>(b)(4)(A)(i)(III)<br>[G]§117.8100(b)(4)(B), (b)(4)(C),<br>(b)(4)(C)(i)<br>§117.8100(b)(4)(C)(ii), (b)(4)(C)(iii)<br>§117.8100(b)(4)(C)(iii)(I),<br>(b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-)<br>§117.8100(b)(5), (b)(6) | §117.445(a), (f), (f)(1),<br>[G](f)(2), (f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|-------|--------|---------|--|--|---|

**FIGURES**

## **FIGURE 1 – AREA MAP**



Location  
LAT: 33.153927  
LONG: -97.257714

**Ponder Compressor Station**

0 0.5 1 2  
Miles



**RESOLUTE**  
COMPLIANCE, LLC  
Purposeful Solutions. Unwavering Service.

**Ponder Compressor Station**  
SWG Pipeline, LLC  
Denton County, TX

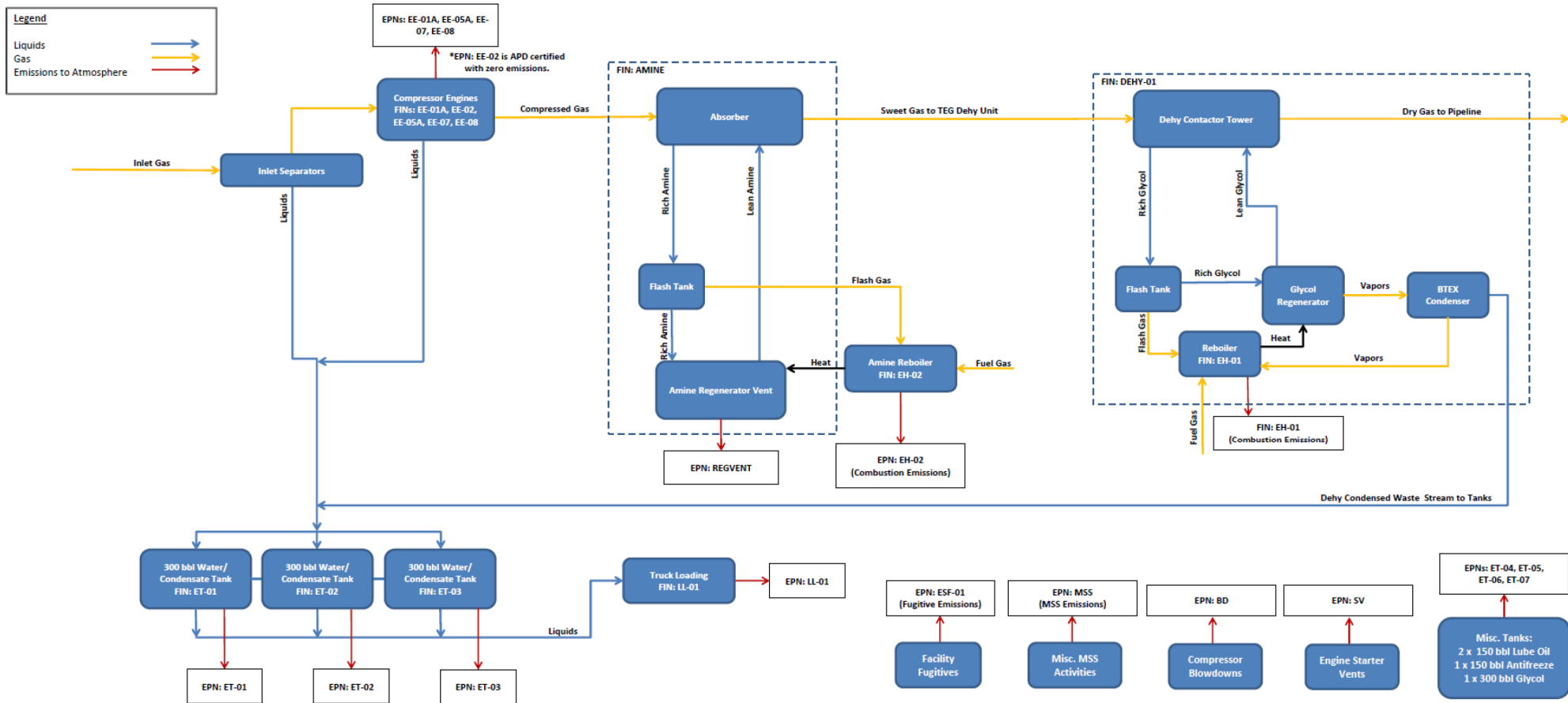
**Site Location Map**

**Project No.** Env-EnLink-0358  
**Report No.** Ponder SOP Mod  
**Date:** December 2024

**FIGURE 1**



## **FIGURE 2 – PROCESS FLOW DIAGRAM**



**ATTACHMENTS**

# **ATTACHMENT A – MAXIMUM ALLOWABLE EMISSION RATE TABLE**

**Ponder Compressor Station**  
**Maximum Allowable Emission Rate Table**  
**Permit by Rule No.: 96573**

| EPN / Emission Source                              | VOC       |          | NO <sub>x</sub> |       | CO     |            | PM <sub>10</sub> /2.5 |      | SO <sub>2</sub> |          | Benzene  |          | Formaldehyde |          |
|--|-----------|----------|-----------------|-------|--------|------------|-----------------------|------|-----------------|----------|----------|----------|--------------|----------|
|  | lbs/hr    | tpy      | lbs/hr          | tpy   | lbs/hr | tpy        | lbs/hr                | tpy  | lbs/hr          | tpy      | lbs/hr   | tpy      | lbs/hr       | tpy      |
| EE-01a / Compressor Engine; CAT G3606              | 0.82      | 3.59     | 1.96            | 8.58  | 0.74   | 3.24       | 0.12                  | 0.53 | 0.01            | 0.04     | 0.01     | 0.04     | 0.08         | 0.35     |
| EE-05a / Compressor Engine; CAT G3516 ULB          | 0.88      | 3.85     | 1.52            | 6.66  | 1.52   | 6.66       | 0.10                  | 0.44 | 0.01            | 0.04     | 0.01     | 0.02     | 0.27         | 1.18     |
| EE-07 / Compressor Engine; CAT G3516 ULB           | 0.88      | 3.85     | 1.52            | 6.66  | 1.52   | 6.66       | 0.10                  | 0.44 | 0.01            | 0.04     | 0.01     | 0.02     | 0.27         | 1.18     |
| EE-08 / Compressor Engine; CAT G3516 ULB           | 0.61      | 2.67     | 1.52            | 6.66  | 1.52   | 6.66       | 0.10                  | 0.44 | 5.92E-03        | 0.03     | 4.07E-03 | 0.02     | 0.53         | 2.33     |
| ESF-01 / Site Fugitives                            | 0.33      | 1.47     | --              | --    | --     | --         | --                    | --   | --              | --       | 1.00E-03 | 4.00E-03 | --           | --       |
| LL-01 / Truck Loading                              | 1.88      | 0.01     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 0.01     | --           | --       |
| ET-01 / Water-Condensate Tank (300 bbl)            | 0.06      | 0.02     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 0.01     | --           | --       |
| ET-02 / Water-Condensate Tank (300 bbl)            | 0.06      | 0.02     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 0.01     | --           | --       |
| ET-03 / Water-Condensate Tank (300 bbl)            | 0.06      | 0.02     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 0.01     | --           | --       |
| ET-04 / Lube Oil Tank (150 bbl)                    | 4.00E-06  | 1.00E-06 | --              | --    | --     | --         | --                    | --   | --              | --       | --       | --       | --           | --       |
| ET-05 / Lube Oil Tank (150 bbl)                    | 4.00E-06  | 1.00E-06 | --              | --    | --     | --         | --                    | --   | --              | --       | --       | --       | --           | --       |
| ET-06 / Antifreeze Tank (150 bbl)                  | 0.10      | 3.00E-03 | --              | --    | --     | --         | --                    | --   | --              | --       | --       | --       | --           | --       |
| ET-07 / Glycol Tank (300 bbl)                      | 0.02      | 0.01     | --              | --    | --     | --         | --                    | --   | --              | --       | --       | --       | --           | --       |
| EH-01 / Glycol Reboiler, Dehydrator Vent (DEHY-01) | 0.11      | 0.49     | 0.25            | 0.88  | 0.17   | 0.74       | 0.01                  | 0.04 | 1.00E-03        | 4.00E-03 | 0.01     | 0.06     | 1.00E-04     | 4.00E-04 |
| EH-02 / Amine Reboiler, Amine Flash Tank (AMINE)   | 0.12      | 0.51     | 0.97            | 4.25  | 0.82   | 3.59       | 0.07                  | 0.31 | 0.01            | 0.04     | 3.02E-03 | 0.01     | 1.00E-03     | 4.00E-03 |
| REGVENT / Amine Regenerator Vent (AMINE)           | 0.28      | 1.20     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.17     | 0.75     | --           | --       |
| BD / Compressor Blowdowns                          | 4.97      | 0.35     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.02     | 1.00E-03 | --           | --       |
| SV / Engine Starter Vents                          | 6.21      | 0.41     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 1.00E-03 | --           | --       |
| MSS / Maintenance Activities                       | 8.63      | 0.33     | --              | --    | --     | --         | 2.21                  | 1.46 | --              | --       | --       | --       | --           | --       |
| SITE-WIDE TOTAL EMISSIONS (TPY):                   | --        | 18.80    | --              | 33.69 | --     | 27.55      | --                    | 3.66 | --              | 0.19     | --       | 0.96     | --           | 5.04     |
| Maximum Operating Schedule:                        | Hours/Day | 24       | Days/Week       |       | 7      | Weeks/Year |                       | 52   | Hours/Year      |          | 8760     |          |              |          |

**Process Heater/Furnace Attributes  
Form OP-UA5 (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, Process Heaters  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Unit Type | Maximum Rated Capacity | RACT Date Placed in Service | Functionally Identical Replacement | Fuel Type(s) |  |  | Annual Heat Input | NOx Emission Limitation | Opt-In Unit | 23C-Option |
|-------------|-------------------|-----------|------------------------|-----------------------------|------------------------------------|--------------|--|--|-------------------|-------------------------|-------------|------------|
| EH-01       | R117-2            | PRHTR     | 5-                     |                             |                                    |              |  |  |                   |                         |             |            |
| EH-02       | R117-3            | PRHTR     | 5-40                   |                             |                                    | NG           |  |  |                   | 410A                    |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |

**Process Heater/Furnace Attributes  
Form OP-UA5 (Page 2)  
Federal Operating Permit Program**

**Table 1b: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 117)  
Subchapter B: Combustion Control at Major Industrial, Commercial, and  
Institutional Sources in Ozone Nonattainment Areas, Process Heaters  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Diluent CEMS | 30 TAC Chapter 116 Limit | NOx Emission Limit Basis | NOx Reduction | Common Stack Combined | Fuel Type Heat Input | NOx Monitoring System |
|-------------|-------------------|--------------|--------------------------|--------------------------|---------------|-----------------------|----------------------|-----------------------|
| EH-02       | R117-3            | NO           |                          | OTHER                    | NONE          |                       |                      | MERT                  |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
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**Process Heater/Furnace Attributes**  
**Form OP-UA5 (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, Process Heaters**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Fuel Flow Monitoring | CO Emission Limitation | CO Monitoring System | NH3 Emission Limitation | NH3 Monitoring |
|-------------|-------------------|----------------------|------------------------|----------------------|-------------------------|----------------|
| EH-02       | R117-3            | X40A                 | 410C                   | OTHER                |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
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**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------|-----------------------------|------------------------------------|-----------------|------------|-------------|-----------------------------|------------------|
| EE-01a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-05a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-07       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-08       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------------------------|-------------|--------------------------|---------------------|----------------------------------|---------------------------|-----------------------------------|
| EE-01a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-05a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-07       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-08       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
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|             |                   |                                     |             |                          |                     |                                  |                           |                                   |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|----------------------|------------------------|---------------------|----------------------|-------------------------------------|----------------------------|
| EE-01a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-05a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-07       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-08       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
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**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | HAP Source | Brake HP | Construction/<br>Reconstruction<br>Date | Nonindustrial<br>Emergency<br>Engine | Service Type | Stationary RICE<br>Type |
|-------------|-------------------|------------|----------|---|--------------------------------------|--------------|-------------------------|
| EE-08       | 63ZZZZ-2          | AREA       | 500+     | 06+                                     |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
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**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Construction/<br>Reconstruction/<br>Modification Date | Test Cell | Exemption | Temp<br>Replacement | Horsepower | Fuel   | AEL<br>No. | Lean<br>Burn | Commencing |
|-------------|----------------------|---|-----------|-----------|---------------------|------------|--------|------------|--------------|------------|
| EE-08       | 60JJJJ-2             | YES   | NO        | NONE      | NO                  | 1350+      | NATGAS |            |              | CON        |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |

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

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Manufacture<br>Date | Displacement | Certified | Operation | Certified<br>Modification | Service | Severe Duty | Optional<br>Compliance |
|-------------|----------------------|---------------------|--------------|-----------|-----------|---------------------------|---------|-------------|------------------------|
| EE-08       | 60JJJJ-2             | N0710+              |              | NO        |           |                           | NON     |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
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|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
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|             |                      |                     |              |           |           |                           |         |             |                        |

**Fugitive Emission Unit Attributes**

**Form OP-UA12 (Page 170)**

**Federal Operating Permit Program**

**Table 19b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction**

**Commenced After September 18, 2015**

**Texas Commission on Environmental Quality**

| <b>Date</b> | <b>Permit No.</b> | <b>Regulated Entity No.</b> |
|-------------|-------------------|-----------------------------|
| 12/17/2024  | O4537             | RN106160260                 |

| <b>Unit ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Construction/Modification Date</b> | <b>Reciprocating Compressor</b> | <b>AMEL</b> | <b>Bypass Device</b> |
|--------------------|--------------------------|---------------------------------------|---------------------------------|-------------|----------------------|
| RECIP-08           | 60OOOOa-2                | 15-                                   |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
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**Fugitive Emission Unit Attributes  
Form OP-UA12 (Page 186)  
Federal Operating Permit Program**

**Table 20b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction,  
Modification or Reconstruction Commenced After August 23, 2011 and on or before September 18, 2015  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID. No. | SOP/GOP Index No. | Construction/<br>Modification Date | Reciprocating Compressor | Bypass Device |
|--------------|-------------------|------------------------------------|--------------------------|---------------|
| RECIP-08     | 600000-3          | 11-15                              | RC26K-                   |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
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|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |



**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID<br>No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations 30 TAC<br>Chapter 116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|------------------------|------------------------------------|--------------------------------|---------------------|--|---|
| A                  | 1                            | EE-08                  | OP-UA2                             | Compressor Engine 8            |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 2                            | RECIP-08               | OP-UA12                            | Reciprocating Compressor 8     |                     | 106.352/12/20/2024[96573]  |   |
| A                  | 3                            | EE-01A                 | OP-UA2                             | Compressor Engine 1A           |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 4                            | EE-05A                 | OP-UA2                             | Compressor Engine 5A           |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 5                            | EE-07                  | OP-UA2                             | Compressor Engine 7            |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 6                            | EH-01                  | OP-UA5                             | Glycol Reboiler                |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 7                            | EH-02                  | OP-UA5                             | Amine Reboiler                 |                     | 106.512/12/20/2024[96573]  |   |
|                    |                              |                        |                                    |                                |                     |  |   |
|                    |                              |                        |                                    |                                |                     |  |   |
|                    |                              |                        |                                    |                                |                     |  |   |

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

|  |   |
|--|---|
| Date: 12/17/2024   |   |
| Permit No.: O4537  |   |
| Regulated Entity No.: RN106160260  |   |
| Company Name: SWG Pipeline, LLC  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input type="checkbox"/> YES <input checked="" 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   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**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.

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

|                                   |
|-----------------------------------|
| Date: 12/17/2024                  |
| Permit No.: O4537                 |
| Regulated Entity No.: RN106160260 |
| Company Name: SWG Pipeline, LLC   |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | EE-08      | OP-UA2          | 96573                | Add engine.   |
| 2            | MS-A          | YES      | RECIP-08   | OP-UA12         | 96573                | Add reciprocating compressor.                                 |
| 3            | MS-A          | NO       | EE-01A     | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 4            | MS-A          | NO       | EE-05A     | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 5            | MS-A          | NO       | EE-07      | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 6            | MS-A          | NO       | EH-01      | OP-UA5          | 96573                | No change – Demonstrate 30 TAC 117 non-applicability.         |
| 7            | MS-A          | NO       | EH-02      | OP-UA5          | 96573                | Add 30 TAC 117 applicability.                                 |
|              |               |          |            |                 |                      |   |
|              |               |          |            |                 |                      |   |
|              |               |          |            |                 |                      |   |

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3  
Texas Commission on Environmental Quality**

|   |   |
|---|---|
| Date: 12/17/2024  |   |
| Permit No.: O4537   |   |
| Regulated Entity No.: RN106160260   |   |
| Company Name: SWG Pipeline, LLC   |   |
| <b>I. Significant Revision</b> <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i> |   |
| A.  | Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>                 |
| B.  | Indicate the alternate language(s) in which public notice is required:  |
| C.  | Will, there be a change in air pollutant emissions as a result of the significant revision? <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 3  
Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

| Pollutant | Description of the Change in Pollutant Emissions |
|-----------|--|
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |

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

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

|   |
|---|
| <b>I. Company Identifying Information</b>   |
| <b>A.</b> Company Name: SWG Pipeline, LLC   |
| <b>B.</b> Customer Reference Number (CN): <b>CN604592279</b>  |
| <b>C.</b> Submittal Date ( <i>mm/dd/yyyy</i> ): 12/18/2024  |
| <b>II. Site Information</b>   |
| <b>A.</b> Site Name: Ponder Compressor Station  |
| <b>B.</b> Regulated Entity Reference Number (RN): <b>RN106160260</b>  |
| <b>C.</b> Indicate affected state(s) required to review permit application: ( <i>Check the appropriate box[es].</i> )   |
| <input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input checked="" type="checkbox"/> OK <input type="checkbox"/> N/A   |
| <b>D.</b> Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br>( <i>Check the appropriate box[es].</i> )  |
| <input type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> HAPS |
| Other:  |
| <b>E.</b> Is the site a non-major source subject to the Federal Operating Permit Program? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No   |
| <b>F.</b> Is the site within a local program area jurisdiction? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No   |
| <b>G.</b> Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  |
| <b>H.</b> Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:   |
| <b>III. Permit Type</b>   |
| <b>A.</b> Type of Permit Requested: ( <i>Select only one response</i> )   |
| <input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)   |

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

|  |
|--|
| <b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>   |
| <b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>  |
| <b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> |
| <b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |
| <b>V. Confidential Information</b>   |
| <b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| <b>VI. Responsible Official (RO) Identifying Information</b>   |
| RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| RO Full Name: Timothy Patton Copeland II   |
| RO Title: Director of Operations   |
| Employer Name: SWG Pipeline, LLC   |
| Mailing Address: 415 Private Road 3502   |
| City: Bridgeport   |
| State: TX  |
| ZIP Code: 76426  |
| Territory:   |
| Country: United States   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (940) 683-1121  |
| Fax No.:   |
| Email: Patton.Copeland@enlink.com  |



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

|  |
|--|
| <b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>  |
| Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)  |
| Technical Contact Full Name: Lance Green   |
| Technical Contact Title: Lead Environmental Permitting Specialist  |
| Employer Name: SWG Pipeline, LLC   |
| Mailing Address: 60985 Derrick Rd  |
| City: Plaquemine   |
| State: LA  |
| ZIP Code: 70764  |
| Territory:   |
| Country: United States   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (225) 692-6947  |
| Fax No.:   |
| Email: Lance.Green@enlink.com  |
| <b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>  |
| <b>A.</b> State Senator: Tan Parker  |
| <b>B.</b> State Representative: Lynn Stuckey   |
| <b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year<br>(Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span> |
| <b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>  |
| <b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish   |

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

|   |
|---|
| <b>IX. Off-Site Permit Request</b><br><i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>                            |
| <b>A.</b> Office/Facility Name: Bridgeport Gas Plant  |
| <b>B.</b> Physical Address: 415 Private Road 3502   |
| City: Bridgeport  |
| State: TX   |
| ZIP Code: 76426   |
| Territory:  |
| Country:  |
| Foreign Postal Code:  |
| <b>C.</b> Physical Location:  |
|   |
|   |
|   |
| <b>D.</b> Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) |
| Contact Full Name: Benjamin Aucoin  |
| <b>E.</b> Telephone No.: (469) 308-6204   |
| <b>X. Application Area Information</b>  |
| <b>A.</b> Area Name: Ponder Compressor Station  |
| <b>B.</b> Physical Address: 4045 Florence Rd  |
| City: Ponder  |
| State: TX   |
| ZIP Code: 76259   |
| <b>C.</b> Physical Location:  |
|   |
|   |
|   |
| <b>D.</b> Nearest City: Ponder  |
| <b>E.</b> State: TX   |
| <b>F.</b> ZIP Code: 76259   |

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

|  |
|--|
| <b>X. Application Area Information <i>(continued)</i></b>  |
| <b>G.</b> Latitude (nearest second): 33° 9' 21" N  |
| <b>H.</b> Longitude (nearest second): 97° 15' 28' W  |
| <b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> |
| <b>J.</b> Indicate the estimated number of emission units in the application area:   |
| <b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):  |
| <b>XI. Public Notice</b><br><i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>  |
| <b>A.</b> Name of a public place to view application and draft permit: Betty Foster Public Library   |
| <b>B.</b> Physical Address: 405 Shaffner St  |
| City: Ponder   |
| ZIP Code: 76259  |
| <b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):  |
| Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):   |
| Contact Person Full Name: Lance Green  |
| Contact Mailing Address: 60985 Derrick Rd  |
| City: Plaquemine   |
| State: LA  |
| ZIP Code: 70764  |
| Territory:   |
| Country:   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (225) 692-6947  |

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

|   |
|---|
| <b>XII. Delinquent Fees and Penalties</b>   |
| <b>Notice:</b> This form will not be processed until all delinquent fees and/or penalties owed to TCEQ or the Office of Attorney General on behalf of TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol." |
| <b>Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.</b>  |
| <b>XIII. Designated Representative (DR) Identifying Information</b>   |
| DR Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| DR Full Name:   |
| DR Title:   |
| Employer Name:  |
| Mailing Address:  |
| City:   |
| State:  |
| ZIP Code:   |
| Territory:  |
| Country:  |
| Foreign Postal Code:  |
| Internal Mail Code:   |
| Telephone No.:  |
| Fax No.:  |
| Email:  |

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

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

**XIV. Alternate Designated Representative (ADR) Identifying Information**

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | Registration No. | PBR No.                | Registration Date |
|-------------|------------------|------------------------|-------------------|
| EE-08       | 96573            | 106.512                | 12/20/2024        |
| RECIP-08    | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
| EH-01       | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
| EH-02       | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |
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|             |                  |                        |                   |
|             |                  |                        |                   |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| N/A         |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| PBR No. | Version No./Date |
|---------|------------------|
| N/A     |                  |
|         |                  |
|         |                  |
|         |                  |
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|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |



**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No.       | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------------|--------------------------------------|---|
| EE-08       | 106.512       | 06/13/2001                           | Measure NOx and CO no later than 7 days after each occurrence of engine maintenance which may reasonably be expected to increase emissions, changes of fuel quality in engines without oxygen sensor-based AFFR controllers which may reasonably be expected to increase emissions, oxygen sensor replacement, or catalyst cleaning or catalyst replacement, per 106.512(2)(C)(ii).   |
| RECIP-08    | 106.352 (a-k) | 11/22/2012                           | A record of the date each quarterly inspection was made and the date that components were found leaking and when repaired or the date of the next planned shutdown.   |
| EH-01       | 106.352 (a-k) | 11/22/2012                           | Records of the hours of operation of every combustion device of any size by the use of a process monitor such as a run time meter, fuel flow meter, or other process variable that indicates a unit is running unless, in the registration for the facility, the emissions from the facility were calculated using full-year operation at maximum design capacity in which case no hours of operation records must be kept. |

|       |               |            |   |
|-------|---------------|------------|---|
| EH-02 | 106.352 (a-k) | 11/22/2012 | Records of the hours of operation of every combustion device of any size by the use of a process monitor such as a run time meter, fuel flow meter, or other process variable that indicates a unit is running unless, in the registration for the facility, the emissions from the facility were calculated using full-year operation at maximum design capacity in which case no hours of operation records must be kept. |
|       |               |            |   |
|       |               |            |   |
|       |               |            |   |
|       |               |            |   |

## Texas Commission on Environmental Quality

Title V Existing

4537

### Site Information (Regulated Entity)

|   |                           |
|---|---------------------------|
| What is the name of the permit area to be authorized? | PONDER COMPRESSOR STATION |
| Does the site have a physical address?                | Yes                       |
| Physical Address                                      |                           |
| Number and Street                                     | 4045 FLORENCE ROAD        |
| City  | PONDER                    |
| State   | TX                        |
| ZIP   | 76259                     |
| County  | DENTON                    |
| Latitude (N) (##.#####)                               | 33.155833                 |
| Longitude (W) (-###.#####)                            | 97.257777                 |
| Primary SIC Code                                      | 1311                      |
| Secondary SIC Code                                    |                           |
| Primary NAICS Code                                    | 211130                    |
| Secondary NAICS Code                                  |                           |
| Regulated Entity Site Information                     |                           |
| What is the Regulated Entity's Number (RN)?           | RN106160260               |
| What is the name of the Regulated Entity (RE)?        | PONDER COMPRESSOR STATION |
| Does the RE site have a physical address?             | Yes                       |
| Physical Address                                      |                           |
| Number and Street                                     | 4045 FLORENCE RD          |
| City  | PONDER                    |
| State   | TX                        |
| ZIP   | 76259                     |
| County  | DENTON                    |
| Latitude (N) (##.#####)                               | 33.153783                 |
| Longitude (W) (-###.#####)                            | -97.259183                |
| Facility NAICS Code                                   |                           |
| What is the primary business of this entity?          | OIL & GAS PRODUCTION      |

### Customer (Applicant) Information

|  |                      |
|--|----------------------|
| How is this applicant associated with this site? | Owner Operator       |
| What is the applicant's Customer Number (CN)?    | CN604592279          |
| Type of Customer                                 | Corporation          |
| Full legal name of the applicant:                |                      |
| Legal Name                                       | SWG Pipeline, L.L.C. |
| Texas SOS Filing Number                          | 801898911            |
| Federal Tax ID                                   |                      |
| State Franchise Tax ID                           | 32052683698          |
| State Sales Tax ID                               |                      |

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

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

|  |                            |
|--|----------------------------|
| Organization Name  | SWG PIPELINE LLC           |
| Prefix   | MR                         |
| First  | TIMOTHY                    |
| Middle   |                            |
| Last   | PATTON COPELAND II         |
| Suffix   |                            |
| Credentials  |                            |
| Title  | DIRECTOR OF OPERATIONS     |
| Enter new address or copy one from list:                     |                            |
| Mailing Address  |                            |
| Address Type   | Domestic                   |
| Mailing Address (include Suite or Bldg. here, if applicable) | 415 PRIVATE ROAD 3502      |
| Routing (such as Mail Code, Dept., or Attn:)                 |                            |
| City   | BRIDGEPORT                 |
| State  | TX                         |
| ZIP  | 76426                      |
| Phone (###-###-####)   | 9406831121                 |
| Extension  |                            |
| Alternate Phone (###-###-####)                               |                            |
| Fax (###-###-####)   |                            |
| E-mail   | patton.copeland@enlink.com |

## Technical Contact

Person TCEQ should contact for questions about this application:

|  |  |
|--|--|
| Select existing TC contact or enter a new contact. | LANCE GREEN(SWG PIPELINE LL... )         |
| Organization Name                                  | SWG PIPELINE LLC                         |
| Prefix   | MR                                       |
| First  | LANCE                                    |
| Middle   |  |
| Last   | GREEN                                    |
| Suffix   |  |
| Credentials  |  |
| Title  | LEAD ENVIRONMENTAL PERMITTING SPECIALIST |
| Enter new address or copy one from list:           |  |
| Mailing Address                                    |  |
| Address Type                                       | Domestic                                 |

|  |                        |
|--|------------------------|
| Mailing Address (include Suite or Bldg. here, if applicable) | 1722 ROUTH ST          |
| Routing (such as Mail Code, Dept., or Attn:)                 | STE 1300               |
| City   | DALLAS                 |
| State  | TX                     |
| ZIP  | 75201                  |
| Phone (###-###-####)   | 2256926947             |
| Extension  |                        |
| Alternate Phone (###-###-####)                               |                        |
| Fax (###-###-####)   |                        |
| E-mail   | lance.green@enlink.com |

## Title V General Information - Existing

|   |                      |
|---|----------------------|
| 1) Permit Type:   | SOP                  |
| 2) Permit Latitude Coordinate:  | 33 Deg 9 Min 21 Sec  |
| 3) Permit Longitude Coordinate:   | 97 Deg 15 Min 28 Sec |
| 4) Is this submittal a new application or an update to an existing application?   | New Application      |
| 4.1. What type of permitting action are you applying for?   | Streamlined Revision |
| 4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?    | No                   |
| 4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation? | No                   |
| 5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?                        | No                   |

## Title V Attachments Existing

### Attach OP-1 (Site Information Summary)

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=230770>OP-1.pdf</a>  |
| Hash      | 82C8628EACACFFB052FAFC819CA29E88EFAAAA1CB280F693FAE1D36B5BB37D47 |
| MIME-Type | application/pdf  |

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

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=230771>OP-2.pdf</a>  |
| Hash      | A50B413C6A3C779267B848E1D48ABD4D84D64C25C1D6B73383288D133731ED7B |
| MIME-Type | application/pdf  |

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

### Attach OP-REQ2 (Negative Applicable Requirement Determinations)

### Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230772>OP\_REQ3\_Ponder - OP-REQ3.pdf</a>

Hash 5620A0B302C5AA9D01727B9859A3A3DEBAADD1BA0A0A09235D8B888D5EC1EBD7

MIME-Type application/pdf

## Attach OP-PBR SUP (Permits by Rule Supplemental Table)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230773>OP\_PBR SUP\_Ponder - OP-PBR SUP.pdf</a>

Hash 1B4B47B849FD35B9B4E5855FCD2FCABC2E4354F49E7061B11865BF5440FFB89E

MIME-Type application/pdf

## Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230775>OP-SUMR.pdf</a>

Hash FF013FE668FF976556D8C2AFE98DF44C4022B76ACD13EE8CA2EA0BBC18B375FE

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=230776>OP-UA5.pdf</a>

Hash 2259F622A4BCC14801A899844B58CAD6FBCB0C18908166EE9F5A1F91D09A72D5

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230778>Ponder - OP-UA12.pdf</a>

Hash 943E7A61D1551E0E76A8B4380CAD359EADA64F111749CEEE72A6E019350EB43B

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230777>Ponder - OP-UA2.pdf</a>

Hash 68E926FD932FB8DFDD4B30CAAF8899C5D8B3EF7FC448BA96FAA6921A98E2EFB4

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=230780>Ponder\_TitleVMod\_20241218.pdf</a>

Hash D7B93EEB50BAA13C8B272F9F812D1E4A0D6C51FE0FA661F38DE847906F5182D0

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 Timothy P Copeland II, the owner of the STEERS account ER099507.
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 4537.
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: Timothy P Copeland II OWNER OPERATOR

Account Number:ER099507

Signature IP Address:174.47.165.2

Signature Date:2024-12-18

Signature Hash:C0C1C9D100E9B9FFA8AA12976FF706B8E260803CE94F45DDABCFA1970BE46ACE

Form Hash Code at time of Signature:BC81186FEF6BA6CD2C0B7487B871BE813DADC772D9305FBBAE2D362747969859

Submission

Reference Number:The application reference number is 731830

Submitted by:The application was submitted by ER099507/Timothy P Copeland II

Submitted Timestamp:The application was submitted on 2024-12-18 at 14:00:27 CST

Submitted From:The application was submitted from IP address 174.47.165.2

Confirmation Number:The confirmation number is 601795

Steers Version:The STEERS version is 6.84

Permit Number:The permit number is 4537

Additional Information

Application Creator: This account was created by Sara Shaw

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## Texas Commission on Environmental Quality

Title V Existing

4537

### Site Information (Regulated Entity)

|   |                           |
|---|---------------------------|
| What is the name of the permit area to be authorized? | PONDER COMPRESSOR STATION |
| Does the site have a physical address?                | Yes                       |
| Physical Address                                      |                           |
| Number and Street                                     | 4045 FLORENCE ROAD        |
| City  | PONDER                    |
| State   | TX                        |
| ZIP   | 76259                     |
| County  | DENTON                    |
| Latitude (N) (##.#####)                               | 33.155833                 |
| Longitude (W) (-###.#####)                            | 97.257777                 |
| Primary SIC Code                                      | 1311                      |
| Secondary SIC Code                                    |                           |
| Primary NAICS Code                                    | 211130                    |
| Secondary NAICS Code                                  |                           |
| Regulated Entity Site Information                     |                           |
| What is the Regulated Entity's Number (RN)?           | RN106160260               |
| What is the name of the Regulated Entity (RE)?        | PONDER COMPRESSOR STATION |
| Does the RE site have a physical address?             | Yes                       |
| Physical Address                                      |                           |
| Number and Street                                     | 4045 FLORENCE RD          |
| City  | PONDER                    |
| State   | TX                        |
| ZIP   | 76259                     |
| County  | DENTON                    |
| Latitude (N) (##.#####)                               | 33.153783                 |
| Longitude (W) (-###.#####)                            | -97.259183                |
| Facility NAICS Code                                   |                           |
| What is the primary business of this entity?          | OIL & GAS PRODUCTION      |

### Customer (Applicant) Information

|  |                      |
|--|----------------------|
| How is this applicant associated with this site? | Owner Operator       |
| What is the applicant's Customer Number (CN)?    | CN604592279          |
| Type of Customer                                 | Corporation          |
| Full legal name of the applicant:                |                      |
| Legal Name                                       | SWG Pipeline, L.L.C. |
| Texas SOS Filing Number                          | 801898911            |
| Federal Tax ID                                   |                      |
| State Franchise Tax ID                           | 32052683698          |
| State Sales Tax ID                               |                      |

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

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

|  |                            |
|--|----------------------------|
| Organization Name  | SWG PIPELINE LLC           |
| Prefix   | MR                         |
| First  | TIMOTHY                    |
| Middle   |                            |
| Last   | PATTON COPELAND II         |
| Suffix   |                            |
| Credentials  |                            |
| Title  | DIRECTOR OF OPERATIONS     |
| Enter new address or copy one from list:                     |                            |
| Mailing Address  |                            |
| Address Type   | Domestic                   |
| Mailing Address (include Suite or Bldg. here, if applicable) | 415 PRIVATE ROAD 3502      |
| Routing (such as Mail Code, Dept., or Attn:)                 |                            |
| City   | BRIDGEPORT                 |
| State  | TX                         |
| ZIP  | 76426                      |
| Phone (###-###-####)   | 9406831121                 |
| Extension  |                            |
| Alternate Phone (###-###-####)                               |                            |
| Fax (###-###-####)   |                            |
| E-mail   | patton.copeland@enlink.com |

## Technical Contact

Person TCEQ should contact for questions about this application:

|  |  |
|--|--|
| Select existing TC contact or enter a new contact. | LANCE GREEN(SWG PIPELINE LL... )         |
| Organization Name                                  | SWG PIPELINE LLC                         |
| Prefix   | MR                                       |
| First  | LANCE                                    |
| Middle   |  |
| Last   | GREEN                                    |
| Suffix   |  |
| Credentials  |  |
| Title  | LEAD ENVIRONMENTAL PERMITTING SPECIALIST |
| Enter new address or copy one from list:           |  |
| Mailing Address                                    |  |
| Address Type                                       | Domestic                                 |

|  |                        |
|--|------------------------|
| Mailing Address (include Suite or Bldg. here, if applicable) | 60985 DERRICK RD       |
| Routing (such as Mail Code, Dept., or Attn:)                 |                        |
| City   | PLAQUEMINE             |
| State  | LA                     |
| ZIP  | 70764                  |
| Phone (###-###-####)   | 2256926947             |
| Extension  |                        |
| Alternate Phone (###-###-####)                               |                        |
| Fax (###-###-####)   |                        |
| E-mail   | lance.green@enlink.com |

## Title V General Information - Existing

|  |                      |
|--|----------------------|
| 1) Permit Type:  | SOP                  |
| 2) Permit Latitude Coordinate:   | 33 Deg 9 Min 21 Sec  |
| 3) Permit Longitude Coordinate:  | 97 Deg 15 Min 28 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.                     | 4537-37508           |
| 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=261803>OP-2 - 4.24.pdf</a> |
| Hash      | AC1ED0138523D20EFF9E2507191F7B9E681DF0F5E23288B99EFAFAC907D52C1B       |
| MIME-Type | application/pdf  |

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

|           |   |
|-----------|---|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=261805>OP-REQ3 - 4.16.pdf</a> |
| Hash      | 1A7E5BB29F5AA43E46F258C0BD1A637C1B026720BAE37266CCA34D0B818AF35F          |
| MIME-Type | application/pdf   |

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=261804>OP-PBR SUP - 4.16.pdf</a>  
Hash 632107ED6F61BA27517FFF2088C1D303B294BC7B43481E10A0230694C4E2548F  
MIME-Type application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=261807>OP-UA12 - Tables 19b 20b - 4.16.pdf</a>  
Hash 89029070364F4010EE0EEFAE833B1EB3C9F387887669F5DB7C384AFEDD09E6B4  
MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=261806>OP-UA2 - 4.16.pdf</a>  
Hash 3915B45B5C33AF36BA70AAE847B2DDFFA583FBE520ADC5EA72C8564E45E1B53  
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.

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 Timothy P Copeland II, the owner of the STEERS account ER099507.
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 4537.

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: Timothy P Copeland II OWNER OPERATOR

|                                      |  |
|--------------------------------------|--|
| Account Number:                      | ER099507   |
| Signature IP Address:                | 174.47.165.2   |
| Signature Date:                      | 2025-06-06   |
| Signature Hash:                      | C0C1C9D100E9B9FFA8AA12976FF706B8E260803CE94F45DDABCFA1970BE46ACE |
| Form Hash Code at time of Signature: | 9D8698D45B06C643AC1AFE32F0A17D35D9F4513E3933A43F578EB1A133D13BDE |

Submission

|                      |  |
|----------------------|--|
| Reference Number:    | The application reference number is 791342                         |
| Submitted by:        | The application was submitted by<br>ER099507/Timothy P Copeland II |
| Submitted Timestamp: | The application was submitted on 2025-06-06<br>at 14:14:44 CDT     |
| Submitted From:      | The application was submitted from IP address<br>174.47.165.2      |
| Confirmation Number: | The confirmation number is 657570                                  |
| Steers Version:      | The STEERS version is 6.91   |
| Permit Number:       | The permit number is 4537  |

Additional Information

Application Creator: This account was created by Kayla N Curtis

**From:** Samantha Mendez  
**Sent:** Wednesday, June 4, 2025 11:55 AM  
**To:** Kayla Curtis  
**Cc:** Jeff Jackson; Aucoin, Benjamin; Huerta, Gabe; Green, Lance; Mark Meyer  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good morning,

I have finished with my technical review for this project. Please submit all updated forms to STEERS for certification by **June 11, 2025**.

If you have any questions or concerns, please do not hesitate to contact me!

Sincerely,  
Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Friday, May 30, 2025 5:06 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Aucoin, Benjamin <[Benjamin.Aucoin@oneok.com](mailto:Benjamin.Aucoin@oneok.com)>; Huerta, Gabe <[Gabe.Huerta@oneok.com](mailto:Gabe.Huerta@oneok.com)>; Green, Lance <[Lance.Green@oneok.com](mailto:Lance.Green@oneok.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

Apologies on the delay -

Please see the Ponder WDP with comments attached for your review.  
Let us know if there are any additional comments or questions.

Thank you and have a great weekend!

**Kayla Curtis**

Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Monday, May 19, 2025 11:05 AM

**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Aucoin, Benjamin <[Benjamin.Aucoin@oneok.com](mailto:Benjamin.Aucoin@oneok.com)>; Huerta, Gabe <[Gabe.Huerta@oneok.com](mailto:Gabe.Huerta@oneok.com)>; Green, Lance <[Lance.Green@oneok.com](mailto:Lance.Green@oneok.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good morning,

I hope this email finds you well.

I wanted to reach out to confirm if you had any comments on the Working Draft Permit that was sent out last month on April 10, 2025.

Please let me know if you have any questions or concerns!

Sincerely,

Samantha Mendez

Environmental Permit Specialist

Air Permits Division, Office of Air

(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Sent:** Friday, April 25, 2025 4:25 PM

**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Aucoin, Benjamin <[Benjamin.Aucoin@oneok.com](mailto:Benjamin.Aucoin@oneok.com)>; Huerta, Gabe <[Gabe.Huerta@oneok.com](mailto:Gabe.Huerta@oneok.com)>; Green, Lance <[Lance.Green@oneok.com](mailto:Lance.Green@oneok.com)>  
**Subject:** RE: (External) RE: Technical Review -- FOP 04537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

Please see the following updated forms associated with the addition of EE-09 and RECIP-09 at Ponder:

- OP-2
  - o Table 2 – Update from PBR to NRSP Authorization
- OP-SUMR
  - o Table 1 – Update from PBR to NRSP Authorization
- OP-PBRSUP
  - o PBR authorization was voided upon issuance of the NRSP
- OP-UA2
  - o Tables 1 – 4: EE-09 (30 TAC 117, MACT ZZZZ)
- OP-UA12
  - o Tables 19b, 20b: RECIP-09 (pre-dates applicability)
- OP-REQ3

Regarding the requested OP-MON for EH-02:

- EH-02 is not subject to CAM requirements as the unit does not meet all three (3) general applicability criteria as outlined in 30 TAC 122.604(b)(1-3).

Please let us know if there are any additional comments or questions!

Once the technical review is complete, we will prepare all updated forms in STEERS for certification.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Thursday, April 10, 2025 1:06 PM

**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>



**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon,

I sincerely apologize for attaching the wrong WDP to my previous email. I have ensured to attach the correct WDP for the Ponder Compressor Station to this email!

Thank you for your cooperation and understanding! I look forward to reviewing the updates accordingly after April 25, 2025.

If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Sent:** Thursday, April 10, 2025 12:14 PM

**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Friday, April 4, 2025 11:55 AM  
**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>  
**Cc:** Rhyen Stone <[Rhyen.Stone@tceq.texas.gov](mailto:Rhyen.Stone@tceq.texas.gov)>  
**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.

- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
  - d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.
- If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Samantha Mendez

**Sent:** Monday, February 3, 2025 2:18 PM

**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_fac](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_fac)

[tsheet.pdf](#). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Friday, May 30, 2025 5:06 PM  
**To:** Samantha Mendez  
**Cc:** Jeff Jackson; Aucoin, Benjamin; Huerta, Gabe; Green, Lance; Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** Ponder - WDP - 4.10.docx  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good afternoon, Samantha!

Apologies on the delay -

Please see the Ponder WDP with comments attached for your review.  
Let us know if there are any additional comments or questions.

Thank you and have a great weekend!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <Samantha.Mendez@tceq.texas.gov>  
**Sent:** Monday, May 19, 2025 11:05 AM  
**To:** Kayla Curtis <kc@resolutecompliance.com>  
**Cc:** Jeff Jackson <jj@resolutecompliance.com>; Aucoin, Benjamin <Benjamin.Aucoin@oneok.com>; Huerta, Gabe <Gabe.Huerta@oneok.com>; Green, Lance <Lance.Green@oneok.com>; Rhyan Stone <Rhyan.Stone@tceq.texas.gov>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good morning,

I hope this email finds you well.

I wanted to reach out to confirm if you had any comments on the Working Draft Permit that was sent out last month on April 10, 2025.

Please let me know if you have any questions or concerns!

Sincerely,  
Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Friday, April 25, 2025 4:25 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Aucoin, Benjamin <[Benjamin.Aucoin@oneok.com](mailto:Benjamin.Aucoin@oneok.com)>; Huerta, Gabe <[Gabe.Huerta@oneok.com](mailto:Gabe.Huerta@oneok.com)>; Green, Lance <[Lance.Green@oneok.com](mailto:Lance.Green@oneok.com)>  
**Subject:** RE: (External) RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

Please see the following updated forms associated with the addition of EE-09 and RECIP-09 at Ponder:

- OP-2
  - o Table 2 – Update from PBR to NRSP Authorization
- OP-SUMR
  - o Table 1 – Update from PBR to NRSP Authorization
- OP-PBRSUP
  - o PBR authorization was voided upon issuance of the NRSP
- OP-UA2
  - o Tables 1 – 4: EE-09 (30 TAC 117, MACT ZZZZ)
- OP-UA12
  - o Tables 19b, 20b: RECIP-09 (pre-dates applicability)
- OP-REQ3

Regarding the requested OP-MON for EH-02:

- EH-02 is not subject to CAM requirements as the unit does not meet all three (3) general applicability criteria as outlined in 30 TAC 122.604(b)(1-3).



Please let us know if there are any additional comments or questions!  
Once the technical review is complete, we will prepare all updated forms in STEERS for certification.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

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**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Thursday, April 10, 2025 1:06 PM  
**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon,

I sincerely apologize for attaching the wrong WDP to my previous email. I have ensured to attach the correct WDP for the Ponder Compressor Station to this email!

Thank you for your cooperation and understanding! I look forward to reviewing the updates accordingly after April 25, 2025.

If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Thursday, April 10, 2025 12:14 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance

 **RESOLUTE**  
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Office: 903.707.8632  
Cell: 817.821.6526  
Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

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**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Friday, April 4, 2025 11:55 AM  
**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.

- Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_fac\\_tsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_fac_tsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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Revised- Draft Page i



## Table of Contents

| Section   | Page |
|---|------|
| General Terms and Conditions .....  | 1    |
| Special Terms and Conditions: .....   | 1    |
| Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping<br>and Reporting..... | 1    |
| New Source Review Authorization Requirements .....  | 6    |
| Compliance Requirements.....  | 6    |
| Permit Location .....   | 8    |
| Attachments .....   | 9    |
| Applicable Requirements Summary.....  | 10   |
| New Source Review Authorization References .....  | 25   |
| Appendix A.....   | 28   |
| Acronym List .....  | 29   |

## **General Terms and Conditions**

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

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

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

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

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

## **Special Terms and Conditions:**

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

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

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

- F. For the purpose of generating emission reduction credits through 30 TAC Chapter 101, Subchapter H, Division 1 (Emission Credit Banking and Trading), the permit holder shall comply with the following requirements:
- (i) Title 30 TAC § 101.302 (relating to General Provisions)
  - (ii) Title 30 TAC § 101.303 (relating to Emission Reduction Credit Generation Certification)
  - (iii) Title 30 TAC § 101.304 (relating to Mobile Emission Reduction Credit Generation and Certification)
  - (iv) Title 30 TAC § 101.309 (relating to Emission Credit Banking and Trading)
  - (v) The terms and conditions by which the emission limits are established to generate the reduction credit are applicable requirements of this permit

2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit

holder shall comply with the following requirements for stationary vents at the site subject to this standard:

- (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(1)(E)
- (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
- (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:
  - (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
  - (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
  - (3) Records of all observations shall be maintained.
  - (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet

prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(5) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

B. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.

C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).

D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:

- (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
- (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
- (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

4. The permit holder shall comply with the following requirements of 30 TAC Chapter 117:

- A. For stationary reciprocating engines subject to Subchapter D, Division 2 at minor sources of NO<sub>x</sub>:
  - (i) Title 30 TAC § 117.2110(a) - (e) (relating to Emission Specifications)
  - (ii) Title 30 TAC § 117.2130 (relating to Operating Requirements)
  - (iii) Title 30 TAC § 117.2135 (relating to Monitoring and Testing Requirements)
  - (iv) Title 30 TAC § 117.2145 (relating to Recordkeeping and Reporting Requirements)
  - (v) Title 30 TAC § 117.9210 (relating to Compliance Schedule)
- 5. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
  - B. Title 40 CFR § 60.8 (relating to Performance Tests)
  - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 6. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
- 7. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
  - A. Title 40 CFR § 63.760(a)(1)(i) - (iii) (relating to Applicability and Designation of Affected Source)
- 8. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

### **New Source Review Authorization Requirements**

9. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated January 25, 2024 in the application for project 35900), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
10. 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.
11. 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).

### **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).

- C. The permit holder shall comply with the requirements of 30 TAC § 117.452 for Final Control Plan Procedures for Reasonably Available Control Technology (RACT) and 30 TAC § 117.456 for Revision of Final Control Plan.
  - D. The permit holder shall comply with the requirements of 30 TAC § 117.454 for Final Control Plan Procedures for Attainment Demonstration Emission Specifications and 30 TAC § 117.456 for Revision of Final Control Plan.
  - E. The permit holder shall comply with the requirement in 30 TAC § 117.450(b) for identification of exempt units in the Initial Control Plan.
14. Use of Emission Credits to comply with applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) Offsets for Title 30 TAC Chapter 116
  - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)-(d)
    - (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
    - (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)-(d)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
    - (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)
15. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) If applicable, offsets for Title 30 TAC Chapter 116
    - (iv) Temporarily exceed state NSR permit allowables



B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:

- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
- (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
- (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
- (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
- (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

**Permit Location**

16. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit at Bridgeport Gas Plant - 415 Private Road 3502, Bridgeport, Texas 76426.

**Attachments**

**Applicable Requirements Summary**

**New Source Review Authorization References**

**Applicable Requirements Summary**

**Unit Summary..... 11**

**Applicable Requirements Summary ..... 13**

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

### Unit Summary

**Commented [KC1]:** Add EE-09 in Unit Summary; R117-1, 63-ZZZZ2. See updated OP-UA2 and OP-REQ3 provided on 4/25.

| Unit/Group/<br>Process ID No. | Unit Type                   | Group/Inclusive<br>Units | SOP Index No. | Regulation                          | Requirement Driver      |
|-------------------------------|-----------------------------|--------------------------|---------------|-------------------------------------|-------------------------|
| DEHY-01                       | GLYCOL DEHYDRATION          | N/A                      | 63HH-1        | 40 CFR Part 63, Subpart HH          | No changing attributes. |
| EE-01A                        | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-01A                        | SRIC ENGINES                | N/A                      | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EH-02                         | PROCESS<br>HEATERS/FURNACES | N/A                      | R117-3        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| RECIP-05A                     | FUGITIVE EMISSION<br>UNITS  | N/A                      | 60OOOOa-2     | 40 CFR Part 60, Subpart<br>OOOOa    | No changing attributes. |

Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type                  | Group/Inclusive<br>Units | SOP Index No. | Regulation                      | Requirement Driver      |
|-------------------------------|----------------------------|--------------------------|---------------|---------------------------------|-------------------------|
| RECIP-08                      | FUGITIVE EMISSION<br>UNITS | N/A                      | 600000-3      | 40 CFR Part 60, Subpart<br>0000 | No changing attributes. |

**Commented [KC1]:** Add EE-09 in Unit Summary; R117-1, 63-ZZZZ2. See updated OP-UA2 and OP-REQ3 provided on 4/25.

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant       | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements   | Recordkeeping Requirements (30 TAC § 122.144)  | Reporting Requirements (30 TAC § 122.145)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
| DEHY-01                   | EU                      | 63HH-1        | 112(B) HAPS     | 40 CFR Part 63, Subpart HH            | § 63.764(e)(1)(ii)<br>§ 63.764(a)<br>§ 63.764(e)(1)<br>§ 63.764(j)<br>§ 63.775(c)(8)  | The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.  | [G]§ 63.772(b)(2)   | § 63.774(d)(1)<br>§ 63.774(d)(1)(ii)   | None  |
| EE-01A                    | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-01A                    | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(I)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)   | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)  | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010  |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-------------|---------------------------------------|--|--|--|---|--|
|                           |                         |               |             |                                       | § 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j)           | on or after June 1, 2007 fired on other than landfill gas, NOx emissions in excess of 0.50 g/hp-hr.  | § 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b)  |   | [G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7)  |
| EE-01A                    | EU                      | 63ZZZZ-1      | 112(B) HAPS | 40 CFR Part 63, Subpart ZZZZ          | § 63.6603(a)-Table 2d.9<br>§ 63.6595(a)(1)<br>§ 63.6605(a)<br>§ 63.6605(b)<br>§ 63.6625(h)<br>§ 63.6640(a)-Table 6.14.a.iii<br>§ 63.6640(b)<br>§ 63.6640(c)(7) | For each existing non-emergency, non-black start 4SLB stationary RICE with a site rating greater than 500 HP that is not a remote stationary RICE and that operates more than 24 hours per calendar year, you must install an oxidation catalyst to reduce HAP emissions from the stationary RICE. | § 63.6612(a)<br>[G]§ 63.6612(b)<br>§ 63.6620(a)<br>§ 63.6620(a)-Table 4.3.a.i<br>§ 63.6620(a)-Table 4.3.a.ii<br>§ 63.6620(a)-Table 4.3.a.iii<br>§ 63.6620(a)-Table 4.3.a.v<br>§ 63.6620(b)<br>§ 63.6620(d)<br>[G]§ 63.6620(e)(2)<br>§ 63.6630(a)-Table 5.13.a.i<br>§ 63.6630(a)-Table 5.13.a.ii<br>§ 63.6630(e)<br>§ 63.6630(e)(1)<br>§ 63.6630(e)(2)<br>§ 63.6630(e)(3) | § 63.6635(a)<br>§ 63.6635(c)<br>§ 63.6655(a)<br>§ 63.6655(a)(1)<br>§ 63.6655(a)(2)<br>§ 63.6655(a)(3)<br>§ 63.6655(a)(4)<br>§ 63.6655(a)(5)<br>§ 63.6655(d)<br>§ 63.6655(e)<br>§ 63.6660(a)<br>§ 63.6660(b)<br>§ 63.6660(c) | § 63.6640(b)<br>§ 63.6640(e)<br>§ 63.6645(a)<br>§ 63.6645(g)<br>§ 63.6645(h)<br>§ 63.6650(a)<br>§ 63.6650(a)-Table 7.3<br>§ 63.6650(b)<br>§ 63.6650(b)(1)<br>§ 63.6650(b)(2)<br>§ 63.6650(b)(3)<br>§ 63.6650(b)(4)<br>[G]§ 63.6650(c)<br>[G]§ 63.6650(d)<br>§ 63.6650(f) |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
|                           |                         |               |                 |                                       |   |   | § 63.6630(e)(5)<br>§ 63.6635(a)<br>§ 63.6635(b)<br>§ 63.6640(a)<br>§ 63.6640(a)-Table 6.14.a.i<br>§ 63.6640(a)-Table 6.14.a.iii<br>§ 63.6640(b)<br>§ 63.6640(c)<br>§ 63.6640(c)(1)<br>§ 63.6640(c)(2)<br>§ 63.6640(c)(3)<br>§ 63.6640(c)(5)<br>§ 63.6640(c)(7)  |  |   |
| EE-05A                    | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-05A                    | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(I)   | No person shall allow the discharge from gas-fired lean-burn engines placed   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)  | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)  | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)   |



### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|--|--|---|---|--|
|                           |                         |               |                 |                                       | § 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j) | into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill gas, NOx emissions in excess of 0.50 g/hp-hr.  | § 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | [G]§ 117.445(f)(3)<br>§ 117.445(f)(8)   | [G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-05A                    | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)  | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-05A                    | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)  | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-------------|---------------------------------------|---|--|---|--|--|
|                           |                         |               |             |                                       |   | comply with a NOx emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.   |   |  |  |
| EE-05A                    | EU                      | 60JJJJ-2      | VOC         | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-05A                    | EU                      | 63ZZZZ-2      | 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   |
| EE-07                     | EU                      | R117-1        | CO          | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)           | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O2, dry basis from any unit  | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)                                      | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8)   | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1) |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)   | subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b)   |  | § 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7)   |
| EE-07                     | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j) | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill gas, NO <sub>x</sub> emissions in excess of 0.50 g/hp-hr.        | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-07                     | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1   | Owners and operators of stationary non-emergency   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)   | [G]§ 60.4245(c)<br>§ 60.4245(d)   |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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) |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|--|---|--|---|---|
|                           |                         |               |                 |                                       | § 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4243(g)                         | natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart.   | § 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)   | § 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4)   |   |
| EE-07                     | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a NO <sub>x</sub> emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)                 | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| EE-07                     | EU                      | 60JJJJ-2      | VOC             | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.             | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| EE-07                     | EU                      | 63ZZZZ-2      | 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   | None   | None  | None                                      |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
|                           |                         |               |                 |                                       |   | 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.  |   |  |   |
| EE-08                     | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-08                     | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(I)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)                          | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)   | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)   |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|--|---|--|
|                           |                         |               |                 |                                       | § 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j)                 | gas, NOx emissions in excess of 0.50 g/hp-hr.   | § 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) |   | § 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-08                     | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-08                     | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NOx emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-08                     | EU                      | 60JJJJ-2      | VOC             | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234   | Owners and operators of stationary non-emergency natural gas engines with a   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)  | [G]§ 60.4245(c)<br>§ 60.4245(d)  |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(iii)<br>§ 60.4243(e)<br>§ 60.4243(g) | maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g)   | § 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) |  |
| EE-08                     | EU                      | 63ZZZZ-2      | 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   |
| EH-02                     | EU                      | R117-3        | CO          | 30 TAC Chapter 117, Subchapter B      | § 117.410(c)(1)<br>§ 117.410(c)(1)(B)<br>§ 117.410(c)(3)<br>§ 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)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>§ 117.445(f)(8)    | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |

### Applicable Requirements Summary

**Commented [KC2]:** Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

| 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|--|--|--|--|
| EH-02                     | EU                      | R117-3        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(3)(B)<br>§ 117.410(a)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.440(j)                                     | No person shall allow the discharge from process heaters with a maximum rated capacity less than 40 MMBtu/hr, NO <sub>x</sub> emissions in excess of 0.036 lb/MMBtu (or alternatively, 30 ppmv, at 3.0% oxygen, dry basis).  | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| RECIP-05A                 | EU                      | 600000a-2     | VOC             | 40 CFR Part 60, Subpart OOOOa         | § 60.5385a(a)(1)<br>§ 60.5370a(a)<br>§ 60.5370a(b)<br>§ 60.5385a<br>§ 60.5385a(a)<br>§ 60.5385a(b)<br>§ 60.5385a(c)<br>§ 60.5385a(d)<br>§ 60.5410a<br>§ 60.5415a(c)<br>§ 60.5415a(c)(2)<br>§ 60.5415a(c)(3) | For each reciprocating compressor, the owner or operator must replace the rod packing on or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, August 2, 2016, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later. | § 60.5410a(c)(1)<br>§ 60.5415a(c)(1)   | § 60.5410a(c)(4)<br>§ 60.5420a(c)<br>[G]§ 60.5420a(c)(3)           | § 60.5410a(c)(3)<br>§ 60.5420a(a)<br>§ 60.5420a(a)(1)<br>§ 60.5420a(b)<br>[G]§ 60.5420a(b)(1)<br>§ 60.5420a(b)(11)<br>[G]§ 60.5420a(b)(13)<br>[G]§ 60.5420a(b)(14)<br>[G]§ 60.5420a(b)(4)  |
| RECIP-08                  | EU                      | 600000-3      | VOC             | 40 CFR Part 60, Subpart OOOO          | § 60.5385(a)(1)<br>§ 60.5370(b)<br>§ 60.5385(a)<br>§ 60.5415(c)(3)<br>§ 60.5420(a)(1)   | Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial  | § 60.5410(c)(1)<br>§ 60.5415(c)(1)   | § 60.5420(c)<br>[G]§ 60.5420(c)(3)                                 | § 60.5420(a)<br>§ 60.5420(a)(1)<br>§ 60.5420(b)<br>[G]§ 60.5420(b)(1)<br>[G]§ 60.5420(b)(4)<br>§ 60.5420(b)(7)(i)  |



Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements | Recordkeeping Requirements (30 TAC § 122.144) | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|-------------------------------------|---|---|
|                           |                         |               |           |                                       |   | startup of your reciprocating compressor affected facility, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later. |                                     |   |   |

Commented [KC2]: Add EE-09 applicability to 30 TAC 117 and 40 CFR 63 Subpart ZZZZ. See updated OP-REQ3 provided on 4/25.

**New Source Review Authorization References**

**New Source Review Authorization References ..... 26**

**New Source Review Authorization References by Emission Unit ..... 27**

#### 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.

| Permits By Rule (30 TAC Chapter 106) for the Application Area |                              |
|---|------------------------------|
| Number: 106.352   | Version No./Date: 11/22/2012 |
| Number: 106.512   | Version No./Date: 06/13/2001 |

**Commented [KC3]:** Facility currently authorized under Non-Rule Standard Permit; Authorization Number: 179828, Issuance Date: 4/25/2025

**Commented [KC4]:** Both below PBRs (106.352, 106.512) were voided on 4/25/2025.

#### **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** |
|---------------------------|--------------------------------|-----------------------------------|
| DEHY-01                   | TEG DEHYDRATOR 1               | 106.352/11/22/2012 [96573]        |
| EE-01A                    | COMPRESSOR ENGINE 1            | 106.352/11/22/2012 [96573]        |
| EE-05A                    | COMPRESSOR ENGINE 2            | 106.352/11/22/2012 [96573]        |
| EE-07                     | COMPRESSOR ENGINE 3            | 106.352/11/22/2012 [96573]        |
| EE-08                     | COMPRESSOR ENGINE 8            | 106.512/06/13/2001 [96573]        |
| EH-02                     | AMINE REBOILER                 | 106.352/11/22/2012 [96573]        |
| RECIP-05A                 | RECIPROCATING COMPRESSOR 2     | 106.352/11/22/2012 [96573]        |
| RECIP-08                  | RECIPROCATING COMPRESSOR 8     | 106.352/11/22/2012 [96573]        |

\*\*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.

**Commented [KC5]:** Add EE-09; Compressor Engine 9

**Commented [KC6]:** Update NSR Authorization column to 179828 for all sources.

**Appendix A**

**Acronym List ..... 29**

## Acronym List

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

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

**From:** Samantha Mendez  
**Sent:** Monday, May 19, 2025 11:05 AM  
**To:** Kayla Curtis  
**Cc:** Jeff Jackson; Aucoin, Benjamin; Huerta, Gabe; Green, Lance; Rhyen Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good morning,

I hope this email finds you well.

I wanted to reach out to confirm if you had any comments on the Working Draft Permit that was sent out last month on April 10, 2025.

Please let me know if you have any questions or concerns!

Sincerely,  
Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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[www.tceq.texas.gov/customersurvey](http://www.tceq.texas.gov/customersurvey)

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**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Friday, April 25, 2025 4:25 PM  
**To:** Samantha Mendez <Samantha.Mendez@tceq.texas.gov>  
**Cc:** Jeff Jackson <jj@resolutecompliance.com>; Aucoin, Benjamin <Benjamin.Aucoin@oneok.com>; Huerta, Gabe <Gabe.Huerta@oneok.com>; Green, Lance <Lance.Green@oneok.com>  
**Subject:** RE: (External) RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

Please see the following updated forms associated with the addition of EE-09 and RECIP-09 at Ponder:

- OP-2
  - o Table 2 – Update from PBR to NRSP Authorization
- OP-SUMR
  - o Table 1 – Update from PBR to NRSP Authorization

- OP-PBRSUP
  - o PBR authorization was voided upon issuance of the NRSP
- OP-UA2
  - o Tables 1 – 4: EE-09 (30 TAC 117, MACT ZZZZ)
- OP-UA12
  - o Tables 19b, 20b: RECIP-09 (pre-dates applicability)
- OP-REQ3

Regarding the requested OP-MON for EH-02:

- EH-02 is not subject to CAM requirements as the unit does not meet all three (3) general applicability criteria as outlined in 30 TAC 122.604(b)(1-3).

Please let us know if there are any additional comments or questions!

Once the technical review is complete, we will prepare all updated forms in STEERS for certification.

Thank you!

**Kayla Curtis**

**Manager, Environmental Compliance**



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Thursday, April 10, 2025 1:06 PM

**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>

**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon,

I sincerely apologize for attaching the wrong WDP to my previous email. I have ensured to attach the correct WDP for the Ponder Compressor Station to this email!

Thank you for your cooperation and understanding! I look forward to reviewing the updates accordingly after April 25, 2025.



If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Thursday, April 10, 2025 12:14 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Friday, April 4, 2025 11:55 AM

**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic

copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Friday, April 25, 2025 4:25 PM  
**To:** Samantha Mendez  
**Cc:** Jeff Jackson; Aucoin, Benjamin; Huerta, Gabe; Green, Lance  
**Subject:** RE: (External) RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** OP-2 - 4.24.pdf; OP-SUMR - Table 1 - 4.16.pdf; OP-PBRSUP - 4.16.pdf; OP-UA2 - 4.16.pdf; OP-UA12 - Tables 19b, 20b - 4.16.pdf; OP-REQ3 - 4.16.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good afternoon, Samantha!

Please see the following updated forms associated with the addition of EE-09 and RECIP-09 at Ponder:

- OP-2
  - o Table 2 – Update from PBR to NRSP Authorization
- OP-SUMR
  - o Table 1 – Update from PBR to NRSP Authorization
- OP-PBRSUP
  - o PBR authorization was voided upon issuance of the NRSP
- OP-UA2
  - o Tables 1 – 4: EE-09 (30 TAC 117, MACT ZZZZ)
- OP-UA12
  - o Tables 19b, 20b: RECIP-09 (pre-dates applicability)
- OP-REQ3

Regarding the requested OP-MON for EH-02:

- EH-02 is not subject to CAM requirements as the unit does not meet all three (3) general applicability criteria as outlined in 30 TAC 122.604(b)(1-3).

Please let us know if there are any additional comments or questions!

Once the technical review is complete, we will prepare all updated forms in STEERS for certification.

Thank you!

**Kayla Curtis**  
**Manager, Environmental Compliance**



Cell: 817.821.6526  
Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Thursday, April 10, 2025 1:06 PM  
**To:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon,

I sincerely apologize for attaching the wrong WDP to my previous email. I have ensured to attach the correct WDP for the Ponder Compressor Station to this email!

Thank you for your cooperation and understanding! I look forward to reviewing the updates accordingly after April 25, 2025.

If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Kayla Curtis <[kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)>  
**Sent:** Thursday, April 10, 2025 12:14 PM  
**To:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>



**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

---

**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Friday, April 4, 2025 11:55 AM

**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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---

**From:** Samantha Mendez

**Sent:** Monday, February 3, 2025 2:18 PM

**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_fac\\_tsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_fac_tsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------|-----------------------------|------------------------------------|-----------------|------------|-------------|-----------------------------|------------------|
| EE-01a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-05a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-07       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-08       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-09       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------------------------|-------------|--------------------------|---------------------|----------------------------------|---------------------------|-----------------------------------|
| EE-01a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-05a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-07       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-08       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-09       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|----------------------|------------------------|---------------------|----------------------|-------------------------------------|----------------------------|
| EE-01a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-05a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-07       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-08       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-09       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | HAP Source | Brake HP | Construction/<br>Reconstruction<br>Date | Nonindustrial<br>Emergency<br>Engine | Service Type | Stationary RICE<br>Type |
|-------------|-------------------|------------|----------|---|--------------------------------------|--------------|-------------------------|
| EE-08       | 63ZZZZ-2          | AREA       | 500+     | 06+                                     |                                      |              |                         |
| EE-09       | 63ZZZZ-1          | AREA       | 500+     | 02-06                                   | NO                                   | NORMAL       | 4SLB                    |
|             |                   |            |          |   |                                      |              |                         |
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**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 5)**

**Federal Operating Permit Program**

**Table 2b: 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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Manufacture Date | Operating Hours | Different Schedule | Emission Limitation | Displacement |
|-------------|-------------------|------------------|-----------------|--------------------|---------------------|--------------|
| EE-09       | 63ZZZZ-1          |                  | NO              | NO                 | LIMCO               |              |
|             |                   |                  |                 |                    |                     |              |
|             |                   |                  |                 |                    |                     |              |
|             |                   |                  |                 |                    |                     |              |
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**Stationary Reciprocating Internal Combustion Engine Attributes  
Form OP-UA2 (Page 6)**

**Federal Operating Permit Program**

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

**Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary 32B Reciprocating Internal Combustion Engines  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Crankcase | Performance Test | Control Technique | Operating Limits | Monitoring System |
|-------------|-------------------|-----------|------------------|-------------------|------------------|-------------------|
| EE-09       | 63ZZZZ-1          |           | YES              | OXCAT             |                  | SHUT1             |
|             |                   |           |                  |                   |                  |                   |
|             |                   |           |                  |                   |                  |                   |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Construction/<br>Reconstruction/<br>Modification Date | Test Cell | Exemption | Temp<br>Replacement | Horsepower | Fuel   | AEL<br>No. | Lean<br>Burn | Commencing |
|-------------|----------------------|---|-----------|-----------|---------------------|------------|--------|------------|--------------|------------|
| EE-08       | 60JJJJ-2             | YES   | NO        | NONE      | NO                  | 1350+      | NATGAS |            |              | CON        |
| EE-09       | 60JJJJ-1             | NO  |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Manufacture<br>Date | Displacement | Certified | Operation | Certified<br>Modification | Service | Severe Duty | Optional<br>Compliance |
|-------------|----------------------|---------------------|--------------|-----------|-----------|---------------------------|---------|-------------|------------------------|
| EE-08       | 60JJJJ-2             | N0710+              |              | NO        |           |                           | NON     |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
|             |                      |                     |              |           |           |                           |         |             |                        |
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**Fugitive Emission Unit Attributes**

**Form OP-UA12 (Page 170)**

**Federal Operating Permit Program**

**Table 19b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction**

**Commenced After September 18, 2015**

**Texas Commission on Environmental Quality**

| <b>Date</b> | <b>Permit No.</b> | <b>Regulated Entity No.</b> |
|-------------|-------------------|-----------------------------|
| 04/16/2025  | O4537             | RN106160260                 |

| <b>Unit ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Construction/Modification Date</b> | <b>Reciprocating Compressor</b> | <b>AMEL</b> | <b>Bypass Device</b> |
|--------------------|--------------------------|---------------------------------------|---------------------------------|-------------|----------------------|
| RECIP-08           | 60OOOOa-2                | 15-                                   |                                 |             |                      |
| RECIP-09           | 60OOOOa-3                | 15-                                   |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
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**Fugitive Emission Unit Attributes  
Form OP-UA12 (Page 186)  
Federal Operating Permit Program**

**Table 20b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction,  
Modification or Reconstruction Commenced After August 23, 2011 and on or before September 18, 2015  
Texas Commission on Environmental Quality**

| Date      | Permit No. | Regulated Entity No. |
|-----------|------------|----------------------|
| 4/16/2025 | O4537      | RN106160260          |

| Unit ID. No. | SOP/GOP Index No. | Construction/<br>Modification Date | Reciprocating Compressor | Bypass Device |
|--------------|-------------------|------------------------------------|--------------------------|---------------|
| RECIP-08     | 600000-3          | 11-15                              | RC26K-                   |               |
| RECIP-09     | 600000-4          | 11-                                |                          |               |
|              |                   |                                    |                          |               |
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**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. |
|------------|------------|----------------------|
| 04/16/2025 | O4537      | RN106160260          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID<br>No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations 30 TAC<br>Chapter 116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|------------------------|------------------------------------|--------------------------------|---------------------|--|---|
| A                  | 1                            | EE-08                  | OP-UA2                             | Compressor Engine 8            |                     | NRSP: 179828   |   |
| A                  | 2                            | RECIP-08               | OP-UA12                            | Reciprocating Compressor 8     |                     | NRSP: 179828   |   |
| A                  | 3                            | EE-01A                 | OP-UA2                             | Compressor Engine 1A           |                     | NRSP: 179828   |   |
| A                  | 4                            | EE-05A                 | OP-UA2                             | Compressor Engine 5A           |                     | NRSP: 179828   |   |
| A                  | 5                            | EE-07                  | OP-UA2                             | Compressor Engine 7            |                     | NRSP: 179828   |   |
| A                  | 6                            | EH-01                  | OP-UA5                             | Glycol Reboiler                |                     | NRSP: 179828   |   |
| A                  | 7                            | EH-02                  | OP-UA5                             | Amine Reboiler                 |                     | NRSP: 179828   |   |
| A                  | 8                            | EE-09                  | OP-UA2                             | Compressor Engine 9            |                     | NRSP: 179828   |   |
| A                  | 9                            | RECIP-09               | OP-UA12                            | Reciprocating Compressor 9     |                     | NRSP: 179828   |   |
|                    |                              |                        |                                    |                                |                     |  |   |



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

**Table 1a: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date: 04/16/2025</b>                | <b>Regulated Entity No.: RN106160260</b>    | <b>Permit No.: O4537</b> |
| <b>Company Name: SWG Pipeline, LLC</b> | <b>Area Name: Ponder Compressor Station</b> |                          |

| <b>Revision No.</b> | <b>Unit/Group/Process ID No.</b> | <b>Unit/Group/Process Applicable Form</b> | <b>SOP/GOP Index No</b> | <b>Pollutant</b>          | <b>Applicable Regulatory Requirement Name</b> | <b>Applicable Regulatory Requirement Standard(s)</b>  |
|---------------------|----------------------------------|---|-------------------------|---------------------------|---|---|
| 1                   | EE-08                            | OP-UA2                                    | 63ZZZZ-2                | HAPS                      | 40 CFR Part 63, Subpart ZZZZ                  | §63.6590(c)   |
| 1                   | EE-08                            | OP-UA2                                    | 60JJJJ-2                | NO <sub>x</sub> , CO, VOC | 40 CFR Part 60, Subpart JJJJ                  | §60.4233(e)-Table 1<br>§60.4234<br>§60.4243(b)(2)(ii), (e), (g)<br>§60.4246   |
| 1                   | EE-08                            | OP-UA2                                    | R117-1                  | NO <sub>x</sub> , CO      | Chapter 117                                   | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2), (c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3), (e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6), (b)(7)<br>§117.440(j) |
| 2                   | RECIP-08                         | OP-UA12                                   | 60OOOO-3                | VOC                       | 40 CFR Part 60, Subpart OOOO                  | §60.5385(a)(1)<br>§60.5370(b)<br>§60.5385(a)<br>§60.5415(c)(3)-(4)<br>§60.5420(a)(1)  |

|   |        |        |        |         |             |  |
|---|--------|--------|--------|---------|-------------|--|
| 3 | EE-01A | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§ 117.410(c)(1)(B)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§ 117.440(j) |
| 4 | EE-05A | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§ 117.410(c)(1)(B)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§ 117.440(j) |
| 5 | EE-07  | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§ 117.410(c)(1)(B)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§ 117.440(j) |
| 6 | EH-01  | OP-UA5 | R117-2 | NOx, CO | Chapter 117 | None [§ 117.403(a)(1)(B)]  |
| 7 | EH-02  | OP-UA5 | R117-3 | NOx, CO | Chapter 117 | § 117.410(a)(3)(B)<br>§ 117.410(a), (b)(2), (c)(1)<br>§ 117.410(c)(1)(A)-(B), (c)(3)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(2)-(3), (b)(4)-(5)<br>§ 117.440(j)                                 |

|   |       |        |          |         |                                 |  |
|---|-------|--------|----------|---------|---------------------------------|--|
| 8 | EE-09 | OP-UA2 | 63ZZZZ-2 | HAPS    | 40 CFR Part 63, Subpart<br>ZZZZ | §63.6603(a)-Table 2d.9<br>§63.6595(a)(1)<br>§63.6605(a), (b)<br>§63.6625(h), (j)<br>§63.6640(a)-Table 6.14.a.iii<br>§63.6640(b), (c)(7)  |
| 8 | EE-09 | OP-UA2 | R117-1   | NOx, CO | Chapter 117                     | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§117.440(j) |
|   |       |        |          |         |                                 |  |

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

**Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date: 04/16/2025</b>                | <b>Regulated Entity No.: RN106160260</b>    | <b>Permit No.: O4537</b> |
| <b>Company Name: SWG Pipeline, LLC</b> | <b>Area Name: Ponder Compressor Station</b> |                          |

| <b>Revision No.</b> | <b>Unit/Group/ Process ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Pollutant</b>          | <b>Monitoring and Testing Requirements</b>           | <b>Recordkeeping Requirements</b>                       | <b>Reporting Requirements</b>      |
|---------------------|-----------------------------------|--------------------------|---------------------------|--|---|------------------------------------|
| 1                   | EE-08                             | 63ZZZZ-2                 | HAPS                      | None   | None  | None                               |
| 1                   | EE-08                             | 60JJJJ-2                 | NO <sub>x</sub> , CO, VOC | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4244(a)-(d) | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4245(a)(1)-(4) | [G]§60.4245(c), (d)<br>§60.4245(d) |

|   |          |          |         |   |   |   |
|---|----------|----------|---------|---|---|---|
| 1 | EE-08    | R117-1   | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
| 2 | RECIP-08 | 600000-3 | VOC     | §60.5410(c)(1)<br>§60.5415(c)(1)  | §60.5420(c), [G](c)(3)  | §60.5420(b), [G](b)(1),<br>[G](b)(4)  |

|   |        |        |         |   |   |   |
|---|--------|--------|---------|---|---|---|
| 3 | EE-01A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|--------|--------|---------|---|---|---|

|   |        |        |         |   |   |   |
|---|--------|--------|---------|---|---|---|
| 4 | EE-05A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|--------|--------|---------|---|---|---|

|   |       |        |         |   |   |   |
|---|-------|--------|---------|---|---|---|
| 5 | EE-07 | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
| 6 | EH-01 | R117-2 | NOx, CO | None  | None  | None  |



|   |       |          |                      |   |  |   |
|---|-------|----------|----------------------|---|--|---|
| 7 | EH-02 | R117-3   | NO <sub>x</sub> , CO | §117.435(a)(1), (a)(3), (b)-(e), (e)(3)<br>§117.440(a), (f), [G](g), (k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3)<br>§117.8000(c)(5)-(6), [G](d)<br>§117.8100(a), (a)(1), (a)(1)(A), (a)(1)(B)<br>§117.8100(a)(1)(B)(ii), (a)(1)(B)(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4), (a)(5)<br>§117.8100(a)(5)(A), (a)(5)(B), [G](a)(5)(D)<br>[G]§117.8100(a)(5)(E), (a)(6), (b), (b)(1)<br>[G]§117.8100(b)(1)(A), (b)(1)(B), (b)(2), (b)(3)<br>§117.8100(b)(3)(A), (b)(3)(B), (b)(4), (b)(4)(A)<br>§117.8100(b)(4)(A)(i)(II), (b)(4)(A)(i)(III)<br>[G]§117.8100(b)(4)(B), (b)(4)(C), (b)(4)(C)(i)<br>§117.8100(b)(4)(C)(ii), (b)(4)(C)(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-)<br>§117.8100(b)(5), (b)(6) | §117.445(a), (f), (f)(1),<br>[G](f)(2), (f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
| 8 | EE-09 | 63ZZZZ-2 | HAPS                 | §63.6625(j)<br>§63.6640(a)<br>§63.6640(a)-Table 6.9.a.i-ii  | §63.6603(f)<br>§63.6625(j)<br>§63.6655(e)<br>§63.6660(a)-(c)                 | §63.6640(e)<br>§63.6650(f)  |

|   |       |        |         |   |   |   |
|---|-------|--------|---------|---|---|---|
| 8 | EE-09 | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|   |       |        |         |   |   |   |

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

| Date       | Permit Number | Regulated Entity Number |
|------------|---------------|-------------------------|
| 04/16/2025 | O4537         | RN106160260             |

| Unit ID No. | Registration No. | PBR No. | Registration Date |
|-------------|------------------|---------|-------------------|
| N/A         |                  |         |                   |
|             |                  |         |                   |
|             |                  |         |                   |
|             |                  |         |                   |
|             |                  |         |                   |
|             |                  |         |                   |
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|             |                  |         |                   |
|             |                  |         |                   |
|             |                  |         |                   |
|             |                  |         |                   |
|             |                  |         |                   |

**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 |
|------------|---------------|-------------------------|
| 04/16/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| N/A         |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 04/16/2024 | O4537         | RN106160260             |

| PBR No. | Version No./Date |
|---------|------------------|
| N/A     |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |

**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 |
|------------|---------------|-------------------------|
| 04/16/2025 | O4537         | RN106160260             |

| Unit ID No. | PBR No. | Version No./Date Or<br>Registration No. | Monitoring Requirement |
|-------------|---------|---|------------------------|
| N/A         |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |
|             |         |   |                        |

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

|  |   |
|--|---|
| Date: 04/16/2025   |   |
| Permit No.: O4537  |   |
| Regulated Entity No.: RN106160260  |   |
| Company Name: SWG Pipeline, LLC  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input type="checkbox"/> YES <input checked="" 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   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**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.



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

|                                   |
|-----------------------------------|
| Date: 04/16/2025                  |
| Permit No.: O4537                 |
| Regulated Entity No.: RN106160260 |
| Company Name: SWG Pipeline, LLC   |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | EE-08      | OP-UA2          | 179828               | Add engine.   |
| 2            | MS-A          | YES      | RECIP-08   | OP-UA12         | 179828               | Add reciprocating compressor.                                 |
| 3            | MS-A          | NO       | EE-01A     | OP-UA2          | 179828               | Add 30 TAC 117 applicability.                                 |
| 4            | MS-A          | NO       | EE-05A     | OP-UA2          | 179828               | Add 30 TAC 117 applicability.                                 |
| 5            | MS-A          | NO       | EE-07      | OP-UA2          | 179828               | Add 30 TAC 117 applicability.                                 |
| 6            | MS-A          | NO       | EH-01      | OP-UA5          | 179828               | No change – Demonstrate 30 TAC 117 non-applicability.         |
| 7            | MS-A          | NO       | EH-02      | OP-UA5          | 179828               | Add 30 TAC 117 applicability.                                 |
| 8            | MS-A          | YES      | EE-09      | OP-UA2          | 179828               | Add engine.   |
| 9            | MS-A          | YES      | RECIP-09   | OP-UA12         | 179828               | Add reciprocating compressor.                                 |
|              |               |          |            |                 |                      |   |

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3  
Texas Commission on Environmental Quality**

|   |   |
|---|---|
| Date: 04/16/2025  |   |
| Permit No.: O4537   |   |
| Regulated Entity No.: RN106160260   |   |
| Company Name: SWG Pipeline, LLC   |   |
| <b>I. Significant Revision</b> <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i> |   |
| A.  | Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>                 |
| B.  | Indicate the alternate language(s) in which public notice is required:  |
| C.  | Will, there be a change in air pollutant emissions as a result of the significant revision? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span> |

**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Thursday, April 10, 2025 2:20 PM  
**To:** Samantha Mendez  
**Cc:** Jeff Jackson; Lance Green; Benjamin Aucoin; Gabe Huerta; Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Samantha,

Thank you for the prompt response and for providing the Ponder WDP.

Have a great day!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

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**From:** Samantha Mendez <Samantha.Mendez@tceq.texas.gov>  
**Sent:** Thursday, April 10, 2025 1:06 PM  
**To:** Kayla Curtis <kc@resolutecompliance.com>  
**Cc:** Jeff Jackson <jj@resolutecompliance.com>; Lance Green <lance.green@enlink.com>; Benjamin Aucoin <benjamin.aucoin@enlink.com>; Gabe Huerta <gabe.huerta@enlink.com>; Rhyan Stone <Rhyan.Stone@tceq.texas.gov>  
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If you have any questions or concerns in the meantime, please do not hesitate to reach out to me.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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**Cc:** Jeff Jackson <[jj@resolutecompliance.com](mailto:jj@resolutecompliance.com)>; Lance Green <[lance.green@enlink.com](mailto:lance.green@enlink.com)>; Benjamin Aucoin <[benjamin.aucoin@enlink.com](mailto:benjamin.aucoin@enlink.com)>; Gabe Huerta <[gabe.huerta@enlink.com](mailto:gabe.huerta@enlink.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
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**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>

**Sent:** Friday, April 4, 2025 11:55 AM

**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>

**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>

**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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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.

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

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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.

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---

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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**From:** Samantha Mendez  
**Sent:** Thursday, April 10, 2025 1:06 PM  
**To:** Kayla Curtis  
**Cc:** Jeff Jackson; Lance Green; Benjamin Aucoin; Gabe Huerta; Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** Working Draft Permit.docx

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Environmental Permit Specialist  
Air Permits Division, Office of Air  
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# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
SWG Pipeline, L.L.C.

AUTHORIZING THE OPERATION OF  
Ponder Compressor Station  
NATURAL GAS EXTRACTION

LOCATED AT  
Denton County, Texas  
Latitude 33° 9' 21" Longitude 97° 15' 28"  
Regulated Entity Number: RN106160260

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

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

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

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

Permit No: Q4537 Issuance Date: \_\_\_\_\_

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



## Table of Contents

| Section   | Page |
|---|------|
| General Terms and Conditions .....  | 1    |
| Special Terms and Conditions: .....   | 1    |
| Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping<br>and Reporting..... | 1    |
| New Source Review Authorization Requirements .....  | 6    |
| Compliance Requirements.....  | 6    |
| Permit Location .....   | 8    |
| Attachments .....   | 9    |
| Applicable Requirements Summary.....  | 10   |
| New Source Review Authorization References .....  | 25   |
| Appendix A.....   | 28   |
| Acronym List .....  | 29   |

## **General Terms and Conditions**

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

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

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

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

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

## **Special Terms and Conditions:**

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

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

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

- F. For the purpose of generating emission reduction credits through 30 TAC Chapter 101, Subchapter H, Division 1 (Emission Credit Banking and Trading), the permit holder shall comply with the following requirements:
  - (i) Title 30 TAC § 101.302 (relating to General Provisions)
  - (ii) Title 30 TAC § 101.303 (relating to Emission Reduction Credit Generation Certification)
  - (iii) Title 30 TAC § 101.304 (relating to Mobile Emission Reduction Credit Generation and Certification)
  - (iv) Title 30 TAC § 101.309 (relating to Emission Credit Banking and Trading)
  - (v) The terms and conditions by which the emission limits are established to generate the reduction credit are applicable requirements of this permit
- 2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
  - A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
- 3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
  - A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit

holder shall comply with the following requirements for stationary vents at the site subject to this standard:

- (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(1)(E)
- (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
- (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:
  - (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
  - (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
  - (3) Records of all observations shall be maintained.
  - (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet

prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(5) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

- B. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- C. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
  - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
  - (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
  - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

- 4. The permit holder shall comply with the following requirements of 30 TAC Chapter 117:

- A. For stationary reciprocating engines subject to Subchapter D, Division 2 at minor sources of NO<sub>x</sub>:
  - (i) Title 30 TAC § 117.2110(a) - (e) (relating to Emission Specifications)
  - (ii) Title 30 TAC § 117.2130 (relating to Operating Requirements)
  - (iii) Title 30 TAC § 117.2135 (relating to Monitoring and Testing Requirements)
  - (iv) Title 30 TAC § 117.2145 (relating to Recordkeeping and Reporting Requirements)
  - (v) Title 30 TAC § 117.9210 (relating to Compliance Schedule)
- 5. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
  - B. Title 40 CFR § 60.8 (relating to Performance Tests)
  - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
- 6. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
- 7. For oil and natural gas production facilities as specified in 40 CFR Part 63, Subpart HH, the permit holder shall comply with the following requirements (Title 30 TAC Chapter 113, Subchapter C, § 113.390 incorporated by reference):
  - A. Title 40 CFR § 63.760(a)(1)(i) - (iii) (relating to Applicability and Designation of Affected Source)
- 8. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

## **New Source Review Authorization Requirements**

9. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated January 25, 2024 in the application for project 35900), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
  - A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
10. 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.
11. 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).

## **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).

- C. The permit holder shall comply with the requirements of 30 TAC § 117.452 for Final Control Plan Procedures for Reasonably Available Control Technology (RACT) and 30 TAC § 117.456 for Revision of Final Control Plan.
  - D. The permit holder shall comply with the requirements of 30 TAC § 117.454 for Final Control Plan Procedures for Attainment Demonstration Emission Specifications and 30 TAC § 117.456 for Revision of Final Control Plan.
  - E. The permit holder shall comply with the requirement in 30 TAC § 117.450(b) for identification of exempt units in the Initial Control Plan.
14. Use of Emission Credits to comply with applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) Offsets for Title 30 TAC Chapter 116
  - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:
    - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)-(d)
    - (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
    - (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)-(d)
    - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
    - (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)
15. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) If applicable, offsets for Title 30 TAC Chapter 116
    - (iv) Temporarily exceed state NSR permit allowables



- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

**Permit Location**

16. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit at Bridgeport Gas Plant - 415 Private Road 3502, Bridgeport, Texas 76426.

## **Attachments**

**Applicable Requirements Summary**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

|                           |           |
|---------------------------|-----------|
| <b>Unit Summary .....</b> | <b>11</b> |
|---------------------------|-----------|

|  |           |
|--|-----------|
| <b>Applicable Requirements Summary .....</b> | <b>13</b> |
|--|-----------|

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

### Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type                   | Group/Inclusive<br>Units | SOP Index No. | Regulation                          | Requirement Driver      |
|-------------------------------|-----------------------------|--------------------------|---------------|-------------------------------------|-------------------------|
| DEHY-01                       | GLYCOL DEHYDRATION          | N/A                      | 63HH-1        | 40 CFR Part 63, Subpart HH          | No changing attributes. |
| EE-01A                        | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-01A                        | SRIC ENGINES                | N/A                      | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-05A                        | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-07                         | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | R117-1        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | 60JJJJ-2      | 40 CFR Part 60, Subpart<br>JJJJ     | No changing attributes. |
| EE-08                         | SRIC ENGINES                | N/A                      | 63ZZZZ-2      | 40 CFR Part 63, Subpart<br>ZZZZ     | No changing attributes. |
| EH-02                         | PROCESS<br>HEATERS/FURNACES | N/A                      | R117-3        | 30 TAC Chapter 117,<br>Subchapter B | No changing attributes. |
| RECIP-05A                     | FUGITIVE EMISSION<br>UNITS  | N/A                      | 60OOOOa-2     | 40 CFR Part 60, Subpart<br>OOOOa    | No changing attributes. |

### Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type                  | Group/Inclusive<br>Units | SOP Index No. | Regulation                      | Requirement Driver      |
|-------------------------------|----------------------------|--------------------------|---------------|---------------------------------|-------------------------|
| RECIP-08                      | FUGITIVE EMISSION<br>UNITS | N/A                      | 600000-3      | 40 CFR Part 60, Subpart<br>0000 | No changing attributes. |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant       | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements   | Recordkeeping Requirements (30 TAC § 122.144)  | Reporting Requirements (30 TAC § 122.145)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
| DEHY-01                   | EU                      | 63HH-1        | 112(B) HAPS     | 40 CFR Part 63, Subpart HH            | § 63.764(e)(1)(ii)<br>§ 63.764(a)<br>§ 63.764(e)(1)<br>§ 63.764(j)<br>§ 63.775(c)(8)  | The owner or operator of an area source is exempt from the requirements of §63.764(d) when the actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere < 0.90 megagram/yr, as determined by the procedures specified in §63.772(b)(2) of this subpart.  | [G]§ 63.772(b)(2)   | § 63.774(d)(1)<br>§ 63.774(d)(1)(ii)   | None  |
| EE-01A                    | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-01A                    | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(iii)(II)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)   | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)  | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010  |

### 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)  |
|---------------------------|-------------------------|---------------|----------------|---------------------------------------|--|--|--|---|--|
|                           |                         |               |                |                                       | § 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j)           | on or after June 1, 2007 fired on other than landfill gas, NOx emissions in excess of 0.50 g/hp-hr.  | § 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b)  |   | [G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7)  |
| EE-01A                    | EU                      | 63ZZZZ-1      | 112(B)<br>HAPS | 40 CFR Part 63, Subpart ZZZZ          | § 63.6603(a)-Table 2d.9<br>§ 63.6595(a)(1)<br>§ 63.6605(a)<br>§ 63.6605(b)<br>§ 63.6625(h)<br>§ 63.6640(a)-Table 6.14.a.iii<br>§ 63.6640(b)<br>§ 63.6640(c)(7) | For each existing non-emergency, non-black start 4SLB stationary RICE with a site rating greater than 500 HP that is not a remote stationary RICE and that operates more than 24 hours per calendar year, you must install an oxidation catalyst to reduce HAP emissions from the stationary RICE. | § 63.6612(a)<br>[G]§ 63.6612(b)<br>§ 63.6620(a)<br>§ 63.6620(a)-Table 4.3.a.i<br>§ 63.6620(a)-Table 4.3.a.ii<br>§ 63.6620(a)-Table 4.3.a.iii<br>§ 63.6620(a)-Table 4.3.a.v<br>§ 63.6620(b)<br>§ 63.6620(d)<br>[G]§ 63.6620(e)(2)<br>§ 63.6630(a)-Table 5.13.a.i<br>§ 63.6630(a)-Table 5.13.a.ii<br>§ 63.6630(e)<br>§ 63.6630(e)(1)<br>§ 63.6630(e)(2)<br>§ 63.6630(e)(3) | § 63.6635(a)<br>§ 63.6635(c)<br>§ 63.6655(a)<br>§ 63.6655(a)(1)<br>§ 63.6655(a)(2)<br>§ 63.6655(a)(3)<br>§ 63.6655(a)(4)<br>§ 63.6655(a)(5)<br>§ 63.6655(d)<br>§ 63.6655(e)<br>§ 63.6660(a)<br>§ 63.6660(b)<br>§ 63.6660(c) | § 63.6640(b)<br>§ 63.6640(e)<br>§ 63.6645(a)<br>§ 63.6645(g)<br>§ 63.6645(h)<br>§ 63.6650(a)<br>§ 63.6650(a)-Table 7.3<br>§ 63.6650(b)<br>§ 63.6650(b)(1)<br>§ 63.6650(b)(2)<br>§ 63.6650(b)(3)<br>§ 63.6650(b)(4)<br>[G]§ 63.6650(c)<br>[G]§ 63.6650(d)<br>§ 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)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
|                           |                         |               |                 |                                       |   |   | § 63.6630(e)(5)<br>§ 63.6635(a)<br>§ 63.6635(b)<br>§ 63.6640(a)<br>§ 63.6640(a)-Table 6.14.a.i<br>§ 63.6640(a)-Table 6.14.a.iii<br>§ 63.6640(b)<br>§ 63.6640(c)<br>§ 63.6640(c)(1)<br>§ 63.6640(c)(2)<br>§ 63.6640(c)(3)<br>§ 63.6640(c)(5)<br>§ 63.6640(c)(7)  |  |   |
| EE-05A                    | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-05A                    | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(iii)(II)   | No person shall allow the discharge from gas-fired lean-burn engines placed   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)  | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)  | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|--|--|---|---|--|
|                           |                         |               |                 |                                       | § 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j) | into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill gas, NOx emissions in excess of 0.50 g/hp-hr.  | § 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | [G]§ 117.445(f)(3)<br>§ 117.445(f)(8)   | [G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-05A                    | EU                      | 60JJJ-2       | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)  | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-05A                    | EU                      | 60JJJ-2       | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)  | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant   | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)   | Reporting Requirements (30 TAC § 122.145)  |
|---------------------------|-------------------------|---------------|-------------|---------------------------------------|---|--|--|---|--|
|                           |                         |               |             |                                       |   | comply with a NOx emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.   |  |   |  |
| EE-05A                    | EU                      | 60JJJJ-2      | VOC         | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-05A                    | EU                      | 63ZZZZ-2      | 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   |
| EE-07                     | EU                      | R117-1        | CO          | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)           | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)                                     | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8)  | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1) |

### 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)  | subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b)   |  | § 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7)   |
| EE-07                     | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(ii)(I)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j) | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill gas, NO <sub>x</sub> emissions in excess of 0.50 g/hp-hr.        | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-07                     | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1  | Owners and operators of stationary non-emergency   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)   | [G]§ 60.4245(c)<br>§ 60.4245(d)   |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant       | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)   | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|--|---|---|
|                           |                         |               |                 |                                       | § 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)                         | natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a CO emission limit of 4.0 g/HP-hr, as listed in Table 1 to this subpart.   | § 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)   | § 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4)   |   |
| EE-07                     | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a NO <sub>x</sub> emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)                 | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| EE-07                     | EU                      | 60JJJJ-2      | VOC             | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2007 and before 07/01/2010 must comply with a VOC emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.             | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| EE-07                     | EU                      | 63ZZZZ-2      | 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   | None   | None  | 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)   |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|---|--|---|
|                           |                         |               |                 |                                       |   | 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.  |   |  |   |
| EE-08                     | EU                      | R117-1        | CO              | 30 TAC Chapter 117, Subchapter B      | § 117.405(d)(1)<br>§ 117.405(d)<br>§ 117.405(d)(1)(B)<br>[G]§ 117.405(f)(1)<br>§ 117.405(f)(2)<br>§ 117.405(f)(3)<br>§ 117.440(j) | No person shall allow the discharge into the atmosphere of carbon monoxide (CO) emissions in excess of 400 ppmv at 3.0% O <sub>2</sub> , dry basis from any unit subject to NO <sub>x</sub> emission specifications in subsection (a) or (b) (or alternatively, 3.0 g/hp-hr for stationary internal combustion engines; or 775 ppmv at 7.0% O <sub>2</sub> , dry basis for wood fuel-fired boilers or process heaters). | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-08                     | EU                      | R117-1        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(4)(B)(iii)(II)<br>§ 117.410(a)<br>§ 117.410(a)(4)(F)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)                        | No person shall allow the discharge from gas-fired lean-burn engines placed into service, modified, reconstructed, or relocated on or after June 1, 2007 fired on other than landfill   | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(h)<br>§ 117.440(k)(1)   | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>[G]§ 117.445(f)(3)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>[G]§ 117.445(e)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|---|--|---|--|
|                           |                         |               |                 |                                       | § 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.430(b)(7)<br>§ 117.440(j)                 | gas, NOx emissions in excess of 0.50 g/hp-hr.   | § 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d)<br>§ 117.8140(a)<br>§ 117.8140(a)(1)<br>§ 117.8140(a)(2)<br>§ 117.8140(a)(2)(A)<br>[G]§ 117.8140(a)(2)(B)<br>§ 117.8140(b) |   | § 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| EE-08                     | EU                      | 60JJJJ-2      | CO              | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-08                     | EU                      | 60JJJJ-2      | NO <sub>x</sub> | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a NOx emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(d)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)  |
| EE-08                     | EU                      | 60JJJJ-2      | VOC             | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234   | Owners and operators of stationary non-emergency natural gas engines with a   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)  | [G]§ 60.4245(c)<br>§ 60.4245(d)  |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant      | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation                      | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)                         | Reporting Requirements (30 TAC § 122.145)  |
|---------------------------|-------------------------|---------------|----------------|---------------------------------------|--|--|--|---|--|
|                           |                         |               |                |                                       | § 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g)   | § 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) |  |
| EE-08                     | EU                      | 63ZZZZ-2      | 112(B)<br>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   |
| EH-02                     | EU                      | R117-3        | CO             | 30 TAC Chapter 117, Subchapter B      | § 117.410(c)(1)<br>§ 117.410(c)(1)(B)<br>§ 117.410(c)(3)<br>§ 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)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(2)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>§ 117.445(f)(8)    | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |

### 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)  |
|---------------------------|-------------------------|---------------|-----------------|---------------------------------------|---|--|--|--|--|
| EH-02                     | EU                      | R117-3        | NO <sub>x</sub> | 30 TAC Chapter 117, Subchapter B      | § 117.410(a)(3)(B)<br>§ 117.410(a)<br>§ 117.410(b)(2)<br>[G]§ 117.410(e)(1)<br>§ 117.410(e)(2)<br>[G]§ 117.410(e)(3)<br>§ 117.410(e)(4)<br>§ 117.430(b)<br>§ 117.440(j)                                     | No person shall allow the discharge from process heaters with a maximum rated capacity less than 40 MMBtu/hr, NO <sub>x</sub> emissions in excess of 0.036 lb/MMBtu (or alternatively, 30 ppmv, at 3.0% oxygen, dry basis).  | § 117.435(a)(1)<br>§ 117.435(a)(3)<br>§ 117.435(b)<br>§ 117.435(d)<br>§ 117.440(a)<br>§ 117.440(k)(1)<br>§ 117.440(k)(2)<br>§ 117.8000(b)<br>§ 117.8000(c)<br>§ 117.8000(c)(1)<br>§ 117.8000(c)(3)<br>§ 117.8000(c)(5)<br>§ 117.8000(c)(6)<br>[G]§ 117.8000(d) | § 117.445(a)<br>§ 117.445(f)<br>§ 117.445(f)(1)<br>§ 117.445(f)(8) | § 117.435(f)<br>§ 117.445(b)<br>[G]§ 117.445(c)<br>§ 117.8010<br>[G]§ 117.8010(1)<br>§ 117.8010(2)<br>§ 117.8010(2)(A)<br>§ 117.8010(2)(B)<br>§ 117.8010(2)(C)<br>§ 117.8010(2)(D)<br>[G]§ 117.8010(3)<br>§ 117.8010(4)<br>[G]§ 117.8010(5)<br>§ 117.8010(6)<br>[G]§ 117.8010(7) |
| RECIP-05A                 | EU                      | 600000a-2     | VOC             | 40 CFR Part 60, Subpart OOOOa         | § 60.5385a(a)(1)<br>§ 60.5370a(a)<br>§ 60.5370a(b)<br>§ 60.5385a<br>§ 60.5385a(a)<br>§ 60.5385a(b)<br>§ 60.5385a(c)<br>§ 60.5385a(d)<br>§ 60.5410a<br>§ 60.5415a(c)<br>§ 60.5415a(c)(2)<br>§ 60.5415a(c)(3) | For each reciprocating compressor, the owner or operator must replace the rod packing on or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, August 2, 2016, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later. | § 60.5410a(c)(1)<br>§ 60.5415a(c)(1)   | § 60.5410a(c)(4)<br>§ 60.5420a(c)<br>[G]§ 60.5420a(c)(3)           | § 60.5410a(c)(3)<br>§ 60.5420a(a)<br>§ 60.5420a(a)(1)<br>§ 60.5420a(b)<br>[G]§ 60.5420a(b)(1)<br>§ 60.5420a(b)(11)<br>[G]§ 60.5420a(b)(13)<br>[G]§ 60.5420a(b)(14)<br>[G]§ 60.5420a(b)(4)  |
| RECIP-08                  | EU                      | 600000-3      | VOC             | 40 CFR Part 60, Subpart OOOO          | § 60.5385(a)(1)<br>§ 60.5370(b)<br>§ 60.5385(a)<br>§ 60.5415(c)(3)<br>§ 60.5420(a)(1)   | Before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial  | § 60.5410(c)(1)<br>§ 60.5415(c)(1)   | § 60.5420(c)<br>[G]§ 60.5420(c)(3)                                 | § 60.5420(a)<br>§ 60.5420(a)(1)<br>§ 60.5420(b)<br>[G]§ 60.5420(b)(1)<br>[G]§ 60.5420(b)(4)<br>§ 60.5420(b)(7)(i)  |



### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements | Recordkeeping Requirements (30 TAC § 122.144) | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|-------------------------------------|---|---|
|                           |                         |               |           |                                       |   | startup of your reciprocating compressor affected facility, or October 15, 2012, or the date of the most recent reciprocating compressor rod packing replacement, whichever is later. |                                     |   |   |

**New Source Review Authorization References**

|  |           |
|--|-----------|
| <b>New Source Review Authorization References .....</b>                  | <b>26</b> |
| <b>New Source Review Authorization References by Emission Unit .....</b> | <b>27</b> |

### **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.

| <b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b> |                              |
|--|------------------------------|
| Number: 106.352  | Version No./Date: 11/22/2012 |
| Number: 106.512  | Version No./Date: 06/13/2001 |

### 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** |
|---------------------------|--------------------------------|-----------------------------------|
| DEHY-01                   | TEG DEHYDRATOR 1               | 106.352/11/22/2012 [96573]        |
| EE-01A                    | COMPRESSOR ENGINE 1            | 106.352/11/22/2012 [96573]        |
| EE-05A                    | COMPRESSOR ENGINE 2            | 106.352/11/22/2012 [96573]        |
| EE-07                     | COMPRESSOR ENGINE 3            | 106.352/11/22/2012 [96573]        |
| EE-08                     | COMPRESSOR ENGINE 8            | 106.512/06/13/2001 [96573]        |
| EH-02                     | AMINE REBOILER                 | 106.352/11/22/2012 [96573]        |
| RECIP-05A                 | RECIPROCATING COMPRESSOR 2     | 106.352/11/22/2012 [96573]        |
| RECIP-08                  | RECIPROCATING COMPRESSOR 8     | 106.352/11/22/2012 [96573]        |

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

## Appendix A

|                    |    |
|--------------------|----|
| Acronym List ..... | 29 |
|--------------------|----|

## Acronym List

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

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

**From:** Kayla Curtis <kc@resolutecompliance.com>  
**Sent:** Thursday, April 10, 2025 12:14 PM  
**To:** Samantha Mendez  
**Cc:** Jeff Jackson; Lance Green; Benjamin Aucoin; Gabe Huerta; Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** Working Draft Permit.docx

Good afternoon, Samantha!

We can provide a comprehensive response to the form update request pertaining to the Ponder FOP O4537 by Friday, April 25<sup>th</sup>.

We are also preparing form updates to include some additional equipment (one (1) engine and associated compressor) to the facility.

Can the Ponder WDP be made available for review during this time? The provided WDP was not Ponder's – I've reattached for your reference.

Thank you!

**Kayla Curtis**  
Manager, Environmental Compliance



1127 Judson Rd. Suite 233 | Longview, TX 75601

Office: 903.707.8632

Cell: 817.821.6526

Email: [kc@resolutecompliance.com](mailto:kc@resolutecompliance.com)

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**From:** Samantha Mendez <[Samantha.Mendez@tceq.texas.gov](mailto:Samantha.Mendez@tceq.texas.gov)>  
**Sent:** Friday, April 4, 2025 11:55 AM  
**To:** Lance Green <[Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)>  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** [EXTERNAL] RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.



- For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).**

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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

---

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com)  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require

the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Sky Global Power One, LLC

AUTHORIZING THE OPERATION OF  
Rock Island  
Sgp1  
Fossil Fuel Electric Power Generation

LOCATED AT  
Colorado County, Texas  
Latitude 29° 33' 0" Longitude 96° 32' 15"  
Regulated Entity Number: RN107585721

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

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

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

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

Permit No: Q3799 Issuance Date: \_\_\_\_\_

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

## Table of Contents

| Section   | Page |
|---|------|
| General Terms and Conditions .....  | 1    |
| Special Terms and Conditions: .....   | 1    |
| Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping<br>and Reporting..... | 1    |
| New Source Review Authorization Requirements .....  | 6    |
| Compliance Requirements.....  | 7    |
| Risk Management Plan .....  | 7    |
| Protection of Stratospheric Ozone .....   | 8    |
| Temporary Fuel Shortages (30 TAC § 112.15) .....  | 8    |
| Permit Location .....   | 8    |
| Permit Shield (30 TAC § 122.148) .....  | 8    |
| Acid Rain Unit Exemptions .....   | 8    |
| Attachments .....   | 9    |
| Applicable Requirements Summary.....  | 10   |
| Additional Monitoring Requirements .....  | 16   |
| Permit Shield .....   | 18   |
| New Source Review Authorization References .....  | 20   |
| Appendix A.....   | 24   |
| Acronym List .....  | 25   |

## **General Terms and Conditions**

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

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

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

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

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

## **Special Terms and Conditions:**

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

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

- E. Emission units subject to 40 CFR Part 63, Subpart ZZZZ as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.1090 which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive

ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

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



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

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

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

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

condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

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

C. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.

D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:

- (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
- (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
- (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

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

- A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
- B. Title 40 CFR § 60.8 (relating to Performance Tests)
- C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
- D. Title 40 CFR § 60.12 (relating to Circumvention)

- E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.

#### **New Source Review Authorization Requirements**

6. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated MON DAY, YYYY in the application for project XXXXX), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
- A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
7. 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.
8. 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).
9. 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. Requirements of the Electric Generating Unit Standard Permit for facilities located in the East Texas region based on the information contained in the registration application.

### **Compliance Requirements**

10. 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.
11. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
- (i) Title 30 TAC Chapter 115
  - (ii) Title 30 TAC Chapter 117
  - (iii) If applicable, offsets for Title 30 TAC Chapter 116
  - (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

### **Risk Management Plan**

12. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.

### **Protection of Stratospheric Ozone**

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

### **Temporary Fuel Shortages (30 TAC § 112.15)**

14. The permit holder shall comply with the following 30 TAC Chapter 112 requirements:
  - A. Title 30 TAC § 112.15 (relating to Temporary Fuel Shortage Plan Filing Requirements)
  - B. Title 30 TAC § 112.16(a), (a)(1), and (a)(2)(B) - (C) (relating to Temporary Fuel Shortage Plan Operating Requirements)
  - C. Title 30 TAC § 112.17 (relating to Temporary Fuel Shortage Plan Notification Procedures)
  - D. Title 30 TAC § 112.18 (relating to Temporary Fuel Shortage Plan Reporting Requirements)

### **Permit Location**

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

### **Permit Shield (30 TAC § 122.148)**

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

### **Acid Rain Unit Exemptions**

17. Emission units; ENGINE1, ENGINE2, ENGINE3, ENGINE4, ENGINE5, and ENGINE6; meet the new unit exemption criteria in 40 CFR § 72.7(a) and are exempt from the Acid Rain Program. The permit holder shall keep records in accordance with 40 CFR § 72.7(f) to demonstrate that the new unit exemption is being met.

## **Attachments**

**Applicable Requirements Summary**

**Additional Monitoring Requirements**

**Permit Shield**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

**Unit Summary ..... 11**

**Applicable Requirements Summary ..... 12**

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

### Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type    | Group/Inclusive<br>Units  | SOP Index No. | Regulation                              | Requirement Driver      |
|-------------------------------|--------------|---|---------------|---|-------------------------|
| EMGEN                         | SRIC ENGINES | N/A   | 60III-1       | 40 CFR Part 60, Subpart IIII            | No changing attributes. |
| EMGEN                         | SRIC ENGINES | N/A   | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ         | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | N/A           | 30 TAC Chapter 116,<br>Standard Permits | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | 60JJJJ-1      | 40 CFR Part 60, Subpart<br>JJJJ         | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ         | No changing attributes. |



### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant              | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation  | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements | Recordkeeping Requirements (30 TAC § 122.144) | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|------------------------|---------------------------------------|--|--|-------------------------------------|---|---|
| EMGEN                     | EU                      | 60III-1       | CO                     | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder and is a 2007 model year and later must comply with a CO emission limit of 5.0 g/KW-hr, as stated in 40 CFR 60.4202(e)-(f), 40 CFR 1042.101, and 40 CFR 1042-Appendix I.                                    | None                                | None  | [G]§ 60.4214(d)                           |
| EMGEN                     | EU                      | 60III-1       | HC and NO <sub>x</sub> | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power less than 600 KW and a displacement of greater than or equal to 15 liters per cylinder and less than 20 liters per cylinder and is a 2014 model year and later must comply with an HC+NO <sub>x</sub> emission limit of 6.2 g/KW-hr, as stated in 40 CFR 60.4202(f)(2) and 40 CFR 1042.101. | None                                | None  | [G]§ 60.4214(d)                           |
| EMGEN                     | EU                      | 60III-1       | PM                     | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power less than 600 KW and a displacement of greater than or equal to 15 liters per cylinder and less   | None                                | None  | [G]§ 60.4214(d)                           |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant         | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)   | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-------------------|---------------------------------------|---|--|--|---|---|
|                           |                         |               |                   |                                       |   | than 20 liters per cylinder and is a 2014 model year and later must comply with a PM emission limit of 0.14 g/KW-hr, as stated in 40 CFR 60.4202(f)(2) and 40 CFR 1042.101.  |  |   |   |
| EMGEN                     | EU                      | 63ZZZZ-1      | 112(B) HAPS       | 40 CFR Part 63, Subpart ZZZZ          | § 63.6590(b)(1)<br>§ 63.6595(c)<br>§ 63.6640(f)(1)<br>§ 63.6640(f)(2)<br>§ 63.6640(f)(2)(i)<br>§ 63.6640(f)(3)              | An affected source which meets either of the criteria in paragraphs §63.6590(b)(1)(i)-(ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f).         | None   | None  | § 63.6645(f)                              |
| GRPENG                    | EU                      | N/A           | CO, FORMALD EHYDE | 30 TAC Chapter 116, Standard Permits  | 122107  | 122107   | 122107<br>** See CAM Summary   | 122107  | 122107                                    |
| GRPENG                    | EU                      | 60JJJJ-1      | CO                | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| GRPENG                    | EU                      | 60JJJJ-1      | NO <sub>x</sub>   | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)                                 | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)                 | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)                    | [G]§ 60.4245(c)<br>§ 60.4245(d)           |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)  | Reporting Requirements (30 TAC § 122.145)   |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|--|--|---|
|                           |                         |               |           |                                       | § 60.4243(e)<br>§ 60.4243(g)  | on or after 07/01/2010 must comply with a NOx emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4244(d)   | § 60.4245(a)(4)  |   |
| GRPENG                    | EU                      | 60JJJJ-1      | VOC       | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)   | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4)  | [G]§ 60.4245(c)<br>§ 60.4245(d)   |
| GRPENG                    | EU                      | 63ZZZZ-1      | CO        | 40 CFR Part 63, Subpart ZZZZ          | § 63.6600(b)-Table 2a.2.a<br>§ 63.6595(c)<br>§ 63.6600(b)-Table 2b.1.a<br>§ 63.6600(b)-Table 2b.1.b<br>§ 63.6605(a)<br>§ 63.6605(b)<br>§ 63.6625(h)<br>§ 63.6630(a)<br>§ 63.6630(b)<br>§ 63.6640(b) | For each new or reconstructed 4SLB stationary RICE with a site rating equal to or more than 500 brake HP located at major source of HAP emissions, operating at 100% load plus or minus 10%, you must reduce CO emission by 93% or more.                                  | § 63.6610(a)<br>§ 63.6610(b)<br>§ 63.6610(c)<br>§ 63.6615<br>§ 63.6620(a)<br>§ 63.6620(a)-Table 3.1<br>§ 63.6620(a)-Table 4.1.a.i<br>§ 63.6620(a)-Table 4.1.a.ii<br>§ 63.6620(a)-Table 4.1.a.iii<br>§ 63.6620(b)<br>§ 63.6620(b)(2)<br>§ 63.6620(d)<br>§ 63.6620(e)(1)<br>[G]§ 63.6620(e)(2)<br>[G]§ 63.6625(b)<br>§ 63.6630(a)-Table 5.1.a.i<br>§ 63.6630(a)-Table 5.1.a.ii | § 63.6620(i)<br>§ 63.6630(a)-Table 5.1.a.iii<br>§ 63.6635(a)<br>§ 63.6635(c)<br>§ 63.6655(a)<br>§ 63.6655(a)(1)<br>§ 63.6655(a)(2)<br>§ 63.6655(a)(3)<br>§ 63.6655(a)(4)<br>§ 63.6655(a)(5)<br>[G]§ 63.6655(b)<br>§ 63.6655(d)<br>§ 63.6660(a)<br>§ 63.6660(b)<br>§ 63.6660(c) | § 63.6620(i)<br>§ 63.6630(c)<br>§ 63.6640(b)<br>§ 63.6640(e)<br>§ 63.6645(a)<br>§ 63.6645(c)<br>§ 63.6645(g)<br>§ 63.6645(h)<br>§ 63.6645(h)(2)<br>§ 63.6650(a)<br>§ 63.6650(a)-Table 7.1.a.i<br>§ 63.6650(a)-Table 7.1.b<br>§ 63.6650(a)-Table 7.1.c<br>§ 63.6650(b)<br>§ 63.6650(b)(1)<br>§ 63.6650(b)(2)<br>§ 63.6650(b)(3)<br>§ 63.6650(b)(4)<br>[G]§ 63.6650(c)<br>[G]§ 63.6650(e)<br>§ 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<br>(30 TAC § 122.144) | Reporting Requirements<br>(30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|--|--|--|
|                           |                         |               |           |                                       |   |   | § 63.6630(a)-Table 5.1.a.iii<br>§ 63.6635(a)<br>§ 63.6635(b)<br>§ 63.6640(a)<br>§ 63.6640(a)-Table 6.1.a.i<br>§ 63.6640(a)-Table 6.1.a.ii<br>§ 63.6640(a)-Table 6.1.a.iii<br>§ 63.6640(a)-Table 6.1.a.iv<br>§ 63.6640(a)-Table 6.1.a.v<br>§ 63.6640(b) |  |  |

**Additional Monitoring Requirements**

**Compliance Assurance Monitoring Summary ..... 17**

### CAM Summary

| Unit/Group/Process Information   |  |
|--|--|
| ID No.: GRPENG   |  |
| Control Device ID No.: OXCAT   | Control Device Type: Other control device type |
| Applicable Regulatory Requirement  |  |
| Name: 30 TAC Chapter 116, Standard Permits   | SOP Index No.: N/A                             |
| Pollutant: CO, FORMALDEHYDE  | Main Standard: 122107                          |
| Monitoring Information   |  |
| Indicator: Catalyst inlet temperature and pressure drop across catalyst  |  |
| Minimum Frequency: Once every 15 minutes for catalyst inlet temperature. Once per month for pressure drop readings.  |  |
| Averaging Period: 4-hour rolling average catalyst inlet temperature  |  |
| Deviation Limit: Maintain minimum catalyst inlet temperature and maintain pressure drop across catalyst established in performance test.   |  |
| <p>CAM Text: Monitor the catalyst inlet temperature and pressure drop across the catalyst. The permit holder shall calibrate, maintain, and operate instrumentation using procedures that take into account manufacturer's specifications.</p> <p>The catalyst inlet temperature and pressure drop readings must meet the range documented in the last successful performance test. Any monitoring data that exceeds the established deviation limits shall be considered and reported as a deviation.</p> |  |

**Permit Shield**

**Permit Shield ..... 19**

### Permit Shield

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

| Unit / Group / Process ID No. | Group / Inclusive Units                              | Regulation                                   | Basis of Determination  |
|-------------------------------|--|--|---|
| GLYC-TK-11                    | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK10                     | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK12                     | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK3                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK4                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK5                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK6                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK7                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK8                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK9                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GRPENG                        | ENGINE1, ENGINE2, ENGINE3, ENGINE4, ENGINE5, ENGINE6 | 30 TAC Chapter 117, Subchapter E, Division 1 | 30 TAC Chapter 117, Subchapter E, Division 1 does not apply in Colorado county. |
| LUBE-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| LUBE-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| UREA-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| UREA-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |



**New Source Review Authorization References**

|  |           |
|--|-----------|
| <b>New Source Review Authorization References .....</b>                  | <b>21</b> |
| <b>New Source Review Authorization References by Emission Unit .....</b> | <b>22</b> |

### 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.: 122107  | Issuance Date:               |
| Permits By Rule (30 TAC Chapter 106) for the Application Area  |                              |
| Number: 106.472  | Version No./Date: 09/04/2000 |
| Number: 106.511  | Version No./Date: 09/04/2000 |
| Number: 106.512  | 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** |
|---------------------------|--------------------------------|-----------------------------------|
| EMGEN                     | EMERGENCY GENERATOR            | 106.512/09/04/2000                |
| ENGINE1                   | ENGINE                         | 122107                            |
| ENGINE2                   | ENGINE                         | 122107                            |
| ENGINE3                   | ENGINE                         | 122107                            |
| ENGINE4                   | ENGINE                         | 122107                            |
| ENGINE5                   | ENGINE                         | 122107                            |
| ENGINE6                   | ENGINE                         | 122107                            |
| GLYC-TK-11                | STORAGE TANK                   | 122107                            |
| GLYC-TK1                  | STORAGE TANK                   | 122107                            |
| GLYC-TK10                 | STORAGE TANK                   | 122107                            |
| GLYC-TK12                 | STORAGE TANK                   | 122107                            |
| GLYC-TK2                  | STORAGE TANK                   | 122107                            |
| GLYC-TK3                  | STORAGE TANK                   | 122107                            |
| GLYC-TK4                  | STORAGE TANK                   | 122107                            |
| GLYC-TK5                  | STORAGE TANK                   | 122107                            |
| GLYC-TK6                  | STORAGE TANK                   | 122107                            |
| GLYC-TK7                  | STORAGE TANK                   | 122107                            |
| GLYC-TK8                  | STORAGE TANK                   | 122107                            |
| GLYC-TK9                  | STORAGE TANK                   | 122107                            |
| LUBE-TK1                  | STORAGE TANK                   | 122107                            |
| LUBE-TK2                  | STORAGE TANK                   | 122107                            |

### **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.

| <b>Unit/Group/Process<br/>ID No.</b> | <b>Emission Unit Name/Description</b> | <b>New Source Review Authorization**</b> |
|--------------------------------------|---------------------------------------|--|
| UREA-TK1                             | STORAGE TANK                          | 122107                                   |
| UREA-TK2                             | STORAGE TANK                          | 122107                                   |

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

**Appendix A**

**Acronym List ..... 25**

## Acronym List

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

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

**From:** Samantha Mendez  
**Sent:** Friday, April 4, 2025 11:55 AM  
**To:** Lance.Green@enlink.com  
**Cc:** Rhyan Stone  
**Subject:** RE: Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station  
**Attachments:** Working Draft Permit.docx

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) initial revision application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

I have conducted a technical review of this application, and I have attached an electronic copy of the Working Draft Permit (WDP) for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

**Please review the WDP and submit to me any comments you have regarding it by April 11, 2025.** Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Note that any application updates necessary to make requested changes must accompany the WDP comments.

In addition to the Working Draft Permit, the following deficiencies were found during my review of the renewal application. **Please respond to the following by April 11, 2025.**

- Currently, form OP-SUMR lists the registration dates for the Preconstruction Authorizations for each emission unit.
  - Please update form OP-SUMR to reflect the version dates for the Preconstruction Authorizations instead.
- Additionally, form OP-SUMR currently has emission units EH-01 and EH-02 listed with PBR 106.512. Form OP-PBRSUP has these emission units listed with PBR 106.352.
  - Please clarify which PBR is correct for emission units EH-01 and EH-02. Furthermore, please provide a new form, either OP-SUMR or OP-PBRSUP, to reflect the changes, respectively.
    - For purposes of the Working Draft Permit, I have put the PBR No. 106.352 in for both units but can change them upon your request.
- Please provide form OP-MON for Chapter 117, to reflect the monitoring requirements for emission unit EH-02.

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 "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process, application updates, WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified submittals, including application updates supporting the WDP comments is required to be submitted with the WDP response. 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 were 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 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](#).

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,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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

---

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** Lance.Green@enlink.com  
**Cc:** Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

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I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

- a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
- b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.

- c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
- d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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



# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Sky Global Power One, LLC

AUTHORIZING THE OPERATION OF  
Rock Island  
Sgp1  
Fossil Fuel Electric Power Generation

LOCATED AT  
Colorado County, Texas  
Latitude 29° 33' 0" Longitude 96° 32' 15"  
Regulated Entity Number: RN107585721

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

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

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

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

Permit No: Q3799 Issuance Date: \_\_\_\_\_

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

## Table of Contents

| Section   | Page |
|---|------|
| General Terms and Conditions .....  | 1    |
| Special Terms and Conditions: .....   | 1    |
| Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping<br>and Reporting..... | 1    |
| New Source Review Authorization Requirements .....  | 6    |
| Compliance Requirements.....  | 7    |
| Risk Management Plan .....  | 7    |
| Protection of Stratospheric Ozone .....   | 8    |
| Temporary Fuel Shortages (30 TAC § 112.15) .....  | 8    |
| Permit Location .....   | 8    |
| Permit Shield (30 TAC § 122.148) .....  | 8    |
| Acid Rain Unit Exemptions .....   | 8    |
| Attachments .....   | 9    |
| Applicable Requirements Summary.....  | 10   |
| Additional Monitoring Requirements .....  | 16   |
| Permit Shield .....   | 18   |
| New Source Review Authorization References .....  | 20   |
| Appendix A.....   | 24   |
| Acronym List .....  | 25   |

## **General Terms and Conditions**

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

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

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

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

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

## **Special Terms and Conditions:**

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

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

- E. Emission units subject to 40 CFR Part 63, Subpart ZZZZ as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.1090 which incorporates the 40 CFR Part 63 Subpart by reference.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive

ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

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



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

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

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

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

condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

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

C. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.

D. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:

- (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
- (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
- (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)

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

- A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
- B. Title 40 CFR § 60.8 (relating to Performance Tests)
- C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
- D. Title 40 CFR § 60.12 (relating to Circumvention)

- E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.

#### **New Source Review Authorization Requirements**

6. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule (including the terms, conditions, monitoring, recordkeeping, and reporting identified in registered PBRs and permits by rule identified in the PBR Supplemental Tables dated MON DAY, YYYY in the application for project XXXXX), standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
- A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
7. 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.
8. 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).
9. 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. Requirements of the Electric Generating Unit Standard Permit for facilities located in the East Texas region based on the information contained in the registration application.

### **Compliance Requirements**

10. 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.
11. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
- (i) Title 30 TAC Chapter 115
  - (ii) Title 30 TAC Chapter 117
  - (iii) If applicable, offsets for Title 30 TAC Chapter 116
  - (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

### **Risk Management Plan**

12. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.

### **Protection of Stratospheric Ozone**

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

### **Temporary Fuel Shortages (30 TAC § 112.15)**

14. The permit holder shall comply with the following 30 TAC Chapter 112 requirements:
  - A. Title 30 TAC § 112.15 (relating to Temporary Fuel Shortage Plan Filing Requirements)
  - B. Title 30 TAC § 112.16(a), (a)(1), and (a)(2)(B) - (C) (relating to Temporary Fuel Shortage Plan Operating Requirements)
  - C. Title 30 TAC § 112.17 (relating to Temporary Fuel Shortage Plan Notification Procedures)
  - D. Title 30 TAC § 112.18 (relating to Temporary Fuel Shortage Plan Reporting Requirements)

### **Permit Location**

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

### **Permit Shield (30 TAC § 122.148)**

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

### **Acid Rain Unit Exemptions**

17. Emission units; ENGINE1, ENGINE2, ENGINE3, ENGINE4, ENGINE5, and ENGINE6; meet the new unit exemption criteria in 40 CFR § 72.7(a) and are exempt from the Acid Rain Program. The permit holder shall keep records in accordance with 40 CFR § 72.7(f) to demonstrate that the new unit exemption is being met.

## **Attachments**

**Applicable Requirements Summary**

**Additional Monitoring Requirements**

**Permit Shield**

**New Source Review Authorization References**

### **Applicable Requirements Summary**

|                           |           |
|---------------------------|-----------|
| <b>Unit Summary .....</b> | <b>11</b> |
|---------------------------|-----------|

|  |           |
|--|-----------|
| <b>Applicable Requirements Summary .....</b> | <b>12</b> |
|--|-----------|

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

### Unit Summary

| Unit/Group/<br>Process ID No. | Unit Type    | Group/Inclusive<br>Units  | SOP Index No. | Regulation                              | Requirement Driver      |
|-------------------------------|--------------|---|---------------|---|-------------------------|
| EMGEN                         | SRIC ENGINES | N/A   | 60III-1       | 40 CFR Part 60, Subpart IIII            | No changing attributes. |
| EMGEN                         | SRIC ENGINES | N/A   | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ         | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | N/A           | 30 TAC Chapter 116,<br>Standard Permits | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | 60JJJJ-1      | 40 CFR Part 60, Subpart<br>JJJJ         | No changing attributes. |
| GRPENG                        | SRIC ENGINES | ENGINE1,<br>ENGINE2,<br>ENGINE3,<br>ENGINE4,<br>ENGINE5,<br>ENGINE6 | 63ZZZZ-1      | 40 CFR Part 63, Subpart<br>ZZZZ         | No changing attributes. |



### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant              | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation  | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements | Recordkeeping Requirements (30 TAC § 122.144) | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|------------------------|---------------------------------------|--|--|-------------------------------------|---|---|
| EMGEN                     | EU                      | 60III-1       | CO                     | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a displacement of greater than or equal to 10 liters per cylinder and less than 30 liters per cylinder and is a 2007 model year and later must comply with a CO emission limit of 5.0 g/KW-hr, as stated in 40 CFR 60.4202(e)-(f), 40 CFR 1042.101, and 40 CFR 1042-Appendix I.                                    | None                                | None  | [G]§ 60.4214(d)                           |
| EMGEN                     | EU                      | 60III-1       | HC and NO <sub>x</sub> | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power less than 600 KW and a displacement of greater than or equal to 15 liters per cylinder and less than 20 liters per cylinder and is a 2014 model year and later must comply with an HC+NO <sub>x</sub> emission limit of 6.2 g/KW-hr, as stated in 40 CFR 60.4202(f)(2) and 40 CFR 1042.101. | None                                | None  | [G]§ 60.4214(d)                           |
| EMGEN                     | EU                      | 60III-1       | PM                     | 40 CFR Part 60, Subpart IIII          | § 60.4205(b)<br>§ 1042.101<br>§ 60.4202(f)(2)<br>§ 60.4206<br>§ 60.4207(b)<br>[G]§ 60.4211(a)<br>§ 60.4211(c)<br>[G]§ 60.4211(f) | Owners and operators of emergency stationary CI ICE, that are not fire pump engines, with a maximum engine power less than 600 KW and a displacement of greater than or equal to 15 liters per cylinder and less   | None                                | None  | [G]§ 60.4214(d)                           |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant         | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)  | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)   | Reporting Requirements (30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-------------------|---------------------------------------|---|--|--|---|---|
|                           |                         |               |                   |                                       |   | than 20 liters per cylinder and is a 2014 model year and later must comply with a PM emission limit of 0.14 g/KW-hr, as stated in 40 CFR 60.4202(f)(2) and 40 CFR 1042.101.  |  |   |   |
| EMGEN                     | EU                      | 63ZZZZ-1      | 112(B) HAPS       | 40 CFR Part 63, Subpart ZZZZ          | § 63.6590(b)(1)<br>§ 63.6595(c)<br>§ 63.6640(f)(1)<br>§ 63.6640(f)(2)<br>§ 63.6640(f)(2)(i)<br>§ 63.6640(f)(3)              | An affected source which meets either of the criteria in paragraphs §63.6590(b)(1)(i)-(ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f).         | None   | None  | § 63.6645(f)                              |
| GRPENG                    | EU                      | N/A           | CO, FORMALD EHYDE | 30 TAC Chapter 116, Standard Permits  | 122107  | 122107   | 122107<br>** See CAM Summary   | 122107  | 122107                                    |
| GRPENG                    | EU                      | 60JJJJ-1      | CO                | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g) | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a CO emission limit of 2.0 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(e) | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4) | [G]§ 60.4245(c)<br>§ 60.4245(d)           |
| GRPENG                    | EU                      | 60JJJJ-1      | NO <sub>x</sub>   | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)                                 | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)                 | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)                    | [G]§ 60.4245(c)<br>§ 60.4245(d)           |

### Applicable Requirements Summary

| Unit Group Process ID No. | Unit Group Process Type | SOP Index No. | Pollutant | State Rule or Federal Regulation Name | Emission Limitation, Standard or Equipment Specification Citation   | Textual Description (See Special Term and Condition 1.B.)   | Monitoring And Testing Requirements  | Recordkeeping Requirements (30 TAC § 122.144)  | Reporting Requirements (30 TAC § 122.145)   |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|--|--|---|
|                           |                         |               |           |                                       | § 60.4243(e)<br>§ 60.4243(g)  | on or after 07/01/2010 must comply with a NOx emission limit of 1.0 g/HP-hr, as listed in Table 1 to this subpart.  | § 60.4244(d)   | § 60.4245(a)(4)  |   |
| GRPENG                    | EU                      | 60JJJJ-1      | VOC       | 40 CFR Part 60, Subpart JJJJ          | § 60.4233(e)-Table 1<br>§ 60.4234<br>§ 60.4243(b)<br>§ 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4243(g)   | Owners and operators of stationary non-emergency natural gas engines with a maximum engine power greater than or equal to 500 HP and were manufactured on or after 07/01/2010 must comply with a VOC emission limit of 0.7 g/HP-hr, as listed in Table 1 to this subpart. | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4244(a)<br>§ 60.4244(b)<br>§ 60.4244(c)<br>§ 60.4244(f)<br>§ 60.4244(g)   | § 60.4243(b)(2)<br>§ 60.4243(b)(2)(ii)<br>§ 60.4243(e)<br>§ 60.4245(a)<br>§ 60.4245(a)(1)<br>§ 60.4245(a)(2)<br>§ 60.4245(a)(4)  | [G]§ 60.4245(c)<br>§ 60.4245(d)   |
| GRPENG                    | EU                      | 63ZZZZ-1      | CO        | 40 CFR Part 63, Subpart ZZZZ          | § 63.6600(b)-Table 2a.2.a<br>§ 63.6595(c)<br>§ 63.6600(b)-Table 2b.1.a<br>§ 63.6600(b)-Table 2b.1.b<br>§ 63.6605(a)<br>§ 63.6605(b)<br>§ 63.6625(h)<br>§ 63.6630(a)<br>§ 63.6630(b)<br>§ 63.6640(b) | For each new or reconstructed 4SLB stationary RICE with a site rating equal to or more than 500 brake HP located at major source of HAP emissions, operating at 100% load plus or minus 10%, you must reduce CO emission by 93% or more.                                  | § 63.6610(a)<br>§ 63.6610(b)<br>§ 63.6610(c)<br>§ 63.6615<br>§ 63.6620(a)<br>§ 63.6620(a)-Table 3.1<br>§ 63.6620(a)-Table 4.1.a.i<br>§ 63.6620(a)-Table 4.1.a.ii<br>§ 63.6620(a)-Table 4.1.a.iii<br>§ 63.6620(b)<br>§ 63.6620(b)(2)<br>§ 63.6620(d)<br>§ 63.6620(e)(1)<br>[G]§ 63.6620(e)(2)<br>[G]§ 63.6625(b)<br>§ 63.6630(a)-Table 5.1.a.i<br>§ 63.6630(a)-Table 5.1.a.ii | § 63.6620(i)<br>§ 63.6630(a)-Table 5.1.a.iii<br>§ 63.6635(a)<br>§ 63.6635(c)<br>§ 63.6655(a)<br>§ 63.6655(a)(1)<br>§ 63.6655(a)(2)<br>§ 63.6655(a)(3)<br>§ 63.6655(a)(4)<br>§ 63.6655(a)(5)<br>[G]§ 63.6655(b)<br>§ 63.6655(d)<br>§ 63.6660(a)<br>§ 63.6660(b)<br>§ 63.6660(c) | § 63.6620(i)<br>§ 63.6630(c)<br>§ 63.6640(b)<br>§ 63.6640(e)<br>§ 63.6645(a)<br>§ 63.6645(c)<br>§ 63.6645(g)<br>§ 63.6645(h)<br>§ 63.6645(h)(2)<br>§ 63.6650(a)<br>§ 63.6650(a)-Table 7.1.a.i<br>§ 63.6650(a)-Table 7.1.b<br>§ 63.6650(a)-Table 7.1.c<br>§ 63.6650(b)<br>§ 63.6650(b)(1)<br>§ 63.6650(b)(2)<br>§ 63.6650(b)(3)<br>§ 63.6650(b)(4)<br>[G]§ 63.6650(c)<br>[G]§ 63.6650(e)<br>§ 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<br>(30 TAC § 122.144) | Reporting Requirements<br>(30 TAC § 122.145) |
|---------------------------|-------------------------|---------------|-----------|---------------------------------------|---|---|--|--|--|
|                           |                         |               |           |                                       |   |   | § 63.6630(a)-Table 5.1.a.iii<br>§ 63.6635(a)<br>§ 63.6635(b)<br>§ 63.6640(a)<br>§ 63.6640(a)-Table 6.1.a.i<br>§ 63.6640(a)-Table 6.1.a.ii<br>§ 63.6640(a)-Table 6.1.a.iii<br>§ 63.6640(a)-Table 6.1.a.iv<br>§ 63.6640(a)-Table 6.1.a.v<br>§ 63.6640(b) |  |  |

**Additional Monitoring Requirements**

**Compliance Assurance Monitoring Summary ..... 17**

### CAM Summary

| Unit/Group/Process Information   |  |
|--|--|
| ID No.: GRPENG   |  |
| Control Device ID No.: OXCAT   | Control Device Type: Other control device type |
| Applicable Regulatory Requirement  |  |
| Name: 30 TAC Chapter 116, Standard Permits   | SOP Index No.: N/A                             |
| Pollutant: CO, FORMALDEHYDE  | Main Standard: 122107                          |
| Monitoring Information   |  |
| Indicator: Catalyst inlet temperature and pressure drop across catalyst  |  |
| Minimum Frequency: Once every 15 minutes for catalyst inlet temperature. Once per month for pressure drop readings.  |  |
| Averaging Period: 4-hour rolling average catalyst inlet temperature  |  |
| Deviation Limit: Maintain minimum catalyst inlet temperature and maintain pressure drop across catalyst established in performance test.   |  |
| <p>CAM Text: Monitor the catalyst inlet temperature and pressure drop across the catalyst. The permit holder shall calibrate, maintain, and operate instrumentation using procedures that take into account manufacturer's specifications.</p> <p>The catalyst inlet temperature and pressure drop readings must meet the range documented in the last successful performance test. Any monitoring data that exceeds the established deviation limits shall be considered and reported as a deviation.</p> |  |

**Permit Shield**

**Permit Shield ..... 19**

### Permit Shield

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

| Unit / Group / Process ID No. | Group / Inclusive Units                              | Regulation                                   | Basis of Determination  |
|-------------------------------|--|--|---|
| GLYC-TK-11                    | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK10                     | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK12                     | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK3                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK4                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK5                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK6                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK7                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK8                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GLYC-TK9                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| GRPENG                        | ENGINE1, ENGINE2, ENGINE3, ENGINE4, ENGINE5, ENGINE6 | 30 TAC Chapter 117, Subchapter E, Division 1 | 30 TAC Chapter 117, Subchapter E, Division 1 does not apply in Colorado county. |
| LUBE-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| LUBE-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| UREA-TK1                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |
| UREA-TK2                      | N/A  | 40 CFR Part 60, Subpart Kb                   | Capacity less than 75 cubic meters (19,800 gal).                                |



**New Source Review Authorization References**

|  |           |
|--|-----------|
| <b>New Source Review Authorization References .....</b>                  | <b>21</b> |
| <b>New Source Review Authorization References by Emission Unit .....</b> | <b>22</b> |

### 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.: 122107  | Issuance Date:               |
| Permits By Rule (30 TAC Chapter 106) for the Application Area  |                              |
| Number: 106.472  | Version No./Date: 09/04/2000 |
| Number: 106.511  | Version No./Date: 09/04/2000 |
| Number: 106.512  | 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** |
|---------------------------|--------------------------------|-----------------------------------|
| EMGEN                     | EMERGENCY GENERATOR            | 106.512/09/04/2000                |
| ENGINE1                   | ENGINE                         | 122107                            |
| ENGINE2                   | ENGINE                         | 122107                            |
| ENGINE3                   | ENGINE                         | 122107                            |
| ENGINE4                   | ENGINE                         | 122107                            |
| ENGINE5                   | ENGINE                         | 122107                            |
| ENGINE6                   | ENGINE                         | 122107                            |
| GLYC-TK-11                | STORAGE TANK                   | 122107                            |
| GLYC-TK1                  | STORAGE TANK                   | 122107                            |
| GLYC-TK10                 | STORAGE TANK                   | 122107                            |
| GLYC-TK12                 | STORAGE TANK                   | 122107                            |
| GLYC-TK2                  | STORAGE TANK                   | 122107                            |
| GLYC-TK3                  | STORAGE TANK                   | 122107                            |
| GLYC-TK4                  | STORAGE TANK                   | 122107                            |
| GLYC-TK5                  | STORAGE TANK                   | 122107                            |
| GLYC-TK6                  | STORAGE TANK                   | 122107                            |
| GLYC-TK7                  | STORAGE TANK                   | 122107                            |
| GLYC-TK8                  | STORAGE TANK                   | 122107                            |
| GLYC-TK9                  | STORAGE TANK                   | 122107                            |
| LUBE-TK1                  | STORAGE TANK                   | 122107                            |
| LUBE-TK2                  | STORAGE TANK                   | 122107                            |

### **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.

| <b>Unit/Group/Process<br/>ID No.</b> | <b>Emission Unit Name/Description</b> | <b>New Source Review Authorization**</b> |
|--------------------------------------|---------------------------------------|--|
| UREA-TK1                             | STORAGE TANK                          | 122107                                   |
| UREA-TK2                             | STORAGE TANK                          | 122107                                   |

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

**Appendix A**

**Acronym List ..... 25**

## Acronym List

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

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

**From:** Samantha Mendez  
**Sent:** Monday, February 3, 2025 2:18 PM  
**To:** Lance.Green@enlink.com  
**Cc:** Rhyan Stone  
**Subject:** Technical Review -- FOP O4537/Project 37508, SWG Pipeline LLC/Ponder Compressor Station

Mr. Green,

I have been assigned to the Federal Operating Permit (FOP) renewal application of Permit No. O4537 for SWG Pipeline LLC/Ponder Compressor Station. This application has been assigned Project No. 37508. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](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://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_facsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_facsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Samantha Mendez  
Environmental Permit Specialist  
Air Permits Division, Office of Air  
(512) 239-6206 | [Samantha.mendez@tceq.texas.gov](mailto:Samantha.mendez@tceq.texas.gov)



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

**Table 1a: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/17/2024                | <b>Regulated Entity No.:</b> RN106160260    | <b>Permit No.:</b> O4537 |
| <b>Company Name:</b> SWG Pipeline, LLC | <b>Area Name:</b> Ponder Compressor Station |                          |

| Revision No. | Unit/Group/Process ID No. | Unit/Group/Process Applicable Form | SOP/GOP Index No | Pollutant                 | Applicable Regulatory Requirement Name | Applicable Regulatory Requirement Standard(s)   |
|--------------|---------------------------|------------------------------------|------------------|---------------------------|--|---|
| 1            | EE-08                     | OP-UA2                             | 63ZZZZ-2         | HAPS                      | 40 CFR Part 63, Subpart ZZZZ           | §63.6590(c)   |
| 1            | EE-08                     | OP-UA2                             | 60JJJJ-2         | NO <sub>x</sub> , CO, VOC | 40 CFR Part 60, Subpart JJJJ           | §60.4233(e)-Table 1<br>§60.4234<br>§60.4243(b)(2)(ii), (e), (g)<br>§60.4246   |
| 2            | RECIP-08                  | OP-UA12                            | 600000-3         | VOC                       | 40 CFR Part 60, Subpart OOOO           | §60.5385(a)(1)<br>§60.5370(b)<br>§60.5385(a)<br>§60.5415(c)(3)-(4)<br>§60.5420(a)(1)  |
| 3            | EE-01A                    | OP-UA2                             | R117-1           | NO <sub>x</sub> , CO      | Chapter 117                            | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2), (c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3), (e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6), (b)(7)<br>§117.440(j) |

|   |        |        |        |         |             |  |
|---|--------|--------|--------|---------|-------------|--|
| 4 | EE-05A | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§ 117.410(c)(1)(B)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§ 117.440(j) |
| 5 | EE-07  | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | § 117.410(a)(4)(B)(ii)(II)<br>§ 117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§ 117.410(c)(1)(B)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§ 117.440(j) |
| 6 | EH-01  | OP-UA5 | R117-2 | NOx, CO | Chapter 117 | None [§ 117.403(a)(1)(B)]  |
| 7 | EH-02  | OP-UA5 | R117-3 | NOx, CO | Chapter 117 | § 117.410(a)(3)(B)<br>§ 117.410(a), (b)(2), (c)(1)<br>§ 117.410(c)(1)(A)-(B), (c)(3)<br>[G]§ 117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§ 117.430(b), (b)(2)-(3), (b)(4)-(5)<br>§ 117.440(j)                                 |

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

**Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date: 12/17/2024</b>                | <b>Regulated Entity No.: RN106160260</b>    | <b>Permit No.: O4537</b> |
| <b>Company Name: SWG Pipeline, LLC</b> | <b>Area Name: Ponder Compressor Station</b> |                          |

| <b>Revision No.</b> | <b>Unit/Group/Processes ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Pollutant</b>          | <b>Monitoring and Testing Requirements</b>           | <b>Recordkeeping Requirements</b>                       | <b>Reporting Requirements</b>        |
|---------------------|------------------------------------|--------------------------|---------------------------|--|---|--------------------------------------|
| 1                   | EE-08                              | 63ZZZZ-2                 | HAPS                      | None   | None  | None                                 |
| 1                   | EE-08                              | 60JJJJ-2                 | NO <sub>x</sub> , CO, VOC | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4244(a)-(d) | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4245(a)(1)-(4) | [G]§60.4245(c), (d)<br>§60.4245(d)   |
| 2                   | RECIP-08                           | 60OOOO-3                 | VOC                       | §60.5410(c)(1)<br>§60.5415(c)(1)                     | §60.5420(c), [G](c)(3)                                  | §60.5420(b), [G](b)(1),<br>[G](b)(4) |

|   |        |        |         |   |  |  |
|---|--------|--------|---------|---|--|--|
| 3 | EE-01A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1), [G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c), [G](d), [G](e)<br>§117.8010, [G](1), (2), (2)(A)-(D)<br>[G]§117.8010(3), (4), [G](5)<br>§117.8010(6), [G](7)-(8)<br>§117.8100(c) |
|---|--------|--------|---------|---|--|--|

|   |        |        |         |  |   |   |
|---|--------|--------|---------|--|---|---|
| 4 | EE-05A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3),<br>(c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-<br>(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A),<br>(b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I),<br>(b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-<br>(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|--------|--------|---------|--|---|---|

|   |       |        |         |   |  |  |
|---|-------|--------|---------|---|--|--|
| 5 | EE-07 | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1), [G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c), [G](d), [G](e)<br>§117.8010, [G](1), (2), (2)(A)-(D)<br>[G]§117.8010(3), (4), [G](5)<br>§117.8010(6), [G](7)-(8)<br>§117.8100(c) |
| 6 | EH-01 | R117-2 | NOx, CO | None  | None   | None   |

|   |       |        |         |  |  |   |
|---|-------|--------|---------|--|--|---|
| 7 | EH-02 | R117-3 | NOx, CO | §117.435(a)(1), (a)(3), (b)-(e), (e)(3)<br>§117.440(a), (f), [G](g), (k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3)<br>§117.8000(c)(5)-(6), [G](d)<br>§117.8100(a), (a)(1), (a)(1)(A), (a)(1)(B)<br>§117.8100(a)(1)(B)(ii), (a)(1)(B)(iii),<br>(a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4), (a)(5)<br>§117.8100(a)(5)(A), (a)(5)(B),<br>[G](a)(5)(D)<br>[G]§117.8100(a)(5)(E), (a)(6), (b), (b)(1)<br>[G]§117.8100(b)(1)(A), (b)(1)(B), (b)(2),<br>(b)(3)<br>§117.8100(b)(3)(A), (b)(3)(B), (b)(4),<br>(b)(4)(A)<br>§117.8100(b)(4)(A)(i)(II),<br>(b)(4)(A)(i)(III)<br>[G]§117.8100(b)(4)(B), (b)(4)(C),<br>(b)(4)(C)(i)<br>§117.8100(b)(4)(C)(ii), (b)(4)(C)(iii)<br>§117.8100(b)(4)(C)(iii)(I),<br>(b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-)<br>§117.8100(b)(5), (b)(6) | §117.445(a), (f), (f)(1),<br>[G](f)(2), (f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|-------|--------|---------|--|--|---|



December 17, 2024

Submitted via STEERS

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

**RE: Site Operating Permit (SOP) Minor Revision Application  
Ponder Compressor Station, Denton County, Texas  
RN106160260  
CN604592279  
Account No.: DFA235A**

Dear APIRT,

SWG Pipeline, LLC (EnLink) is submitting this Title V Site Operating Permit (SOP) Minor Revision Application for the Ponder Compressor Station (Facility) in accordance with Title 30 of the Texas Administrative Code (TAC) Chapter 122. The Facility is currently authorized under Air Quality Standard Permit No.96573. Basic Facility info is as follows:

- Facility Type: Natural gas compression
- Facility Owner/Operator: SWG Pipeline, LLC
- Regulated Entity: RN106160260
- Customer Number: CN604592279
- Application Type: SOP Minor Revision

This full permit application contains an OP-1, OP-2, OP-PBR SUP, OP-SUMR, OP-UAs, and OP-REQ3.



1127 Judson Rd. Suite 233 – Longview, TX 75601  
[www.ResoluteCompliance.com](http://www.ResoluteCompliance.com)





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Any clarification questions or requests for additional information can be directed to myself via email to [jj@resolutecompliance.com](mailto:jj@resolutecompliance.com) or by phone at 903-707-8614 or Mr. Lance Green via email to [Lance.Green@enlink.com](mailto:Lance.Green@enlink.com) or by phone at 225-692-6947.

Kind Regards,

A handwritten signature in black ink, appearing to read 'J. Jackson', with a stylized, flowing script.

Jeff A. Jackson

Vice President EHSR

Encl: SOP Minor Revision Application

Cc: Benjamin Aucoin – SWG Pipeline, LLC  
Lance Green – SWG Pipeline, LLC

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**RESOLUTE**  
COMPLIANCE, LLC

1127 Judson Rd. Suite 233 – Longview, TX 75601  
[www.ResoluteCompliance.com](http://www.ResoluteCompliance.com)



December 17, 2024

Submitted via STEERS

Ms. Kimberli Fowler  
Region 4 Air Section Manager  
Texas Commission On Environmental Quality  
2309 Gravel Dr.  
Fort Worth, TX 76118-6951

**RE: Site Operating Permit (SOP) Minor Revision Application  
Ponder Compressor Station, Denton County, Texas  
RN106160260  
CN604592279  
Account No.: DFA235A**

Dear Ms. Fowler,

Please find enclosed a copy of the Title V Site Operating Permit (SOP) Minor Revision Application submitted to the Texas Commission on Environmental Quality (TCEQ).

Any clarification questions or requests for additional information can be directed to myself via email to [jj@resolutecompliance.com](mailto:jj@resolutecompliance.com) or by phone at 903-707-8614 or Mr. Lance Green at [lance.green@enlink.com](mailto:lance.green@enlink.com) and 225-692-6947.

Kind Regards,

Jeff A. Jackson

Vice President EHSR

Encl: SOP Minor Revision Application

Cc: Benjamin Aucoin – SWG Pipeline, LLC  
Lance Green – SWG Pipeline, LLC

---

**RESOLUTE**  
COMPLIANCE, LLC

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[www.ResoluteCompliance.com](http://www.ResoluteCompliance.com)



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December 17, 2024

Environmental Protection Agency, Region 6  
Air Permits Section (ARPE)  
Renaissance Tower  
1201 Elm St., Suite 500  
Dallas, Texas 75270-2102

Delivered via Email to [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov)

**RE: Site Operating Permit (SOP) Minor Revision Application  
Ponder Compressor Station, Denton County, Texas  
RN106160260  
CN604592279  
Account No.: DFA235A**

Dear Air Permits Section,

Please find enclosed a copy of the Title V Site Operating Permit (SOP) Minor Revision Application submitted to the Texas Commission on Environmental Quality (TCEQ).

Any clarification questions or requests for additional information can be directed to myself via email to [jj@resolutecompliance.com](mailto:jj@resolutecompliance.com) or by phone at 903-707-8614 or Mr. Lance Green at [lance.green@enlink.com](mailto:lance.green@enlink.com) and 225-692-6947.

Kind Regards,

Jeff A. Jackson

Vice President EHSR

Encl: SOP Minor Revision Application

Cc: Benjamin Aucoin – SWG Pipeline, LLC  
Lance Green – SWG Pipeline, LLC

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**RESOLUTE**  
COMPLIANCE, LLC

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[www.ResoluteCompliance.com](http://www.ResoluteCompliance.com)



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Federal Operating Permit Minor Revision Application

Site Operating Permit (SOP) O4537

Ponder Compressor Station

Denton County, Texas

SWG Pipeline, LLC

RN106160260

CN604592279

Date: December 17, 2024

Prepared by:

Jeff A. Jackson – Vice President EHSR

Resolute Compliance, LLC

1127 Judson Rd. Suite 233

Longview, TX 75601

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# TABLE OF CONTENTS

|               |   |    |
|---------------|---|----|
| Section 1.0   | INTRODUCTION .....  | 5  |
| Forms.....    |   | 5  |
| Figures ..... |   | 5  |
| Section 2.0   | PROCESS DESCRIPTION.....  | 6  |
| Section 3.0   | CONSTRUCTION PERMIT AUTHORIZATIONS .....  | 7  |
| Section 4.0   | STATE AND FEDERAL REGULATORY SUMMARY .....  | 8  |
| Section 4.1   | State Regulatory Applicability .....  | 8  |
| Section 4.1.1 | Preconstruction Authorization.....  | 8  |
| Section 4.1.2 | 30 Texas Administrative Code (TAC) 101 Applicability .....  | 8  |
| Section 4.1.3 | 30 TAC 111 Applicability.....   | 8  |
| Section 4.1.4 | 30 TAC 115 Applicability.....   | 8  |
| Section 4.1.5 | 30 TAC 117 Applicability.....   | 9  |
| Section 4.1.6 | 30 TAC 122 Applicability.....   | 10 |
| Section 4.2   | Potentially Applicable Federal Regulations .....  | 13 |
| Section 4.2.1 | 40 CFR Part 60 Subpart A - General Provisions .....   | 13 |
| Section 4.2.2 | 40 CFR Part 60 Subpart K, Ka, Kb – Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) ..... | 13 |
| Section 4.2.3 | 40 CFR Part 60 Subpart KKK - Equipment Leaks of VOC From Onshore Natural Gas Processing Plants                                | 13 |
| Section 4.2.4 | 40 CFR Part 60 Subpart LLL - Standards of Performance for SO2 Emissions.....  | 13 |
| Section 4.2.5 | 40 CFR Part 60 Subpart IIII – Stationary Compression Ignition Internal Combustion Engine .....                                | 13 |

|                |  |    |
|----------------|--|----|
| Section 4.2.6  | 40 CFR Part 60 Subpart JJJJ - Stationary Spark Ignition Internal Combustion Engines .....                                | 13 |
| Section 4.2.7  | 40 CFR Part 60 Subpart OOOO - Crude Oil and Natural Gas Production, Transmission and Distribution.....                   | 14 |
| Section 4.2.8  | 40 CFR Part 60 Subpart OOOOa - Crude Oil and Natural Gas Facilities .....  | 14 |
| Section 4.2.9  | 40 CFR Part 60 Subpart OOOOb - Crude Oil and Natural Gas Facilities .....  | 15 |
| Section 4.2.10 | 40 CFR Part 61 Subpart A – General Provisions .....  | 15 |
| Section 4.2.11 | 40 CFR Part 63 Subpart A – General Provisions .....  | 15 |
| Section 4.2.12 | 40 CFR Part 63 Subpart HH - Oil and Natural Gas Production Facilities .....  | 16 |
| Section 4.2.13 | 40 CFR Part 63 Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines .....                                 | 16 |
| Section 4.2.14 | 40 CFR Part 63 Subpart DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters Major Sources ..... | 16 |
| Section 4.2.15 | 40 CFR Part 63 Subpart JJJJJ - Industrial, Commercial, and Institutional Boilers Area Sources .....                      | 16 |
| Section 4.2.16 | 40 CFR Part 64 Compliance Assurance Monitoring.....  | 16 |
| Section 4.2.17 | 40 CFR Part 68 Chemical Accident Prevention Provisions .....   | 16 |

## FORMS

## FIGURES

## ATTACHMENTS

## FORMS

## FIGURES

FIGURE 1 – AREA MAP

FIGURE 2 – PROCESS FLOW DIAGRAM

## ATTACHMENTS

ATTACHMENT A – CURRENT CONSTRUCTION AUTHORIZATION MAERT

## SECTION 1.0 INTRODUCTION

SWG Pipeline, LLC (EnLink) is seeking to authorize a Site Operating Permit (SOP) minor revision for the Ponder Compressor Station (Facility).

EnLink is submitting this SOP minor revision application to incorporate the following changes, which were authorized under Permit By Rule (PBR) 95673: add one (1) Caterpillar G3516 ULB engine (EE-08) and associated reciprocating compressor (RECIP-08).

A Maximum Allowable Emission Rate Table (MAERT) extracted from the most recent construction authorization for the Facility is provided in Attachment A.

The submittal includes all required forms, figures, and regulatory applicability information required for an SOP minor revision application. A summary of provided materials is as follows:

### FORMS

- OP-1 Site Information Summary
- OP-2 Application for Permit Revision/Renewal
- OP-PBRSUP Permits by Rule Supplemental Table
- OP-SUMR Individual Unit Summary for Revisions
- Applicable Unit Attribute (UA) Forms
  - OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes
  - OP-UA5 – Process Heater/Furnace Attributes
  - OP-UA12 – Fugitive Emission Unit Attributes
- OP-REQ3 Applicable Requirements Summary

### FIGURES

- Area Map
- Process Flow Diagram

The following sections provide a process description, a summary of pre-construction authorizations, and potentially applicable State and Federal Requirements in support of this application.



## SECTION 2.0      PROCESS DESCRIPTION

Produced natural gas and produced liquids enter the Facility via an inlet separator. Liquids from the inlet stream are routed to three (3) water/condensate storage tanks (Facility Identification Numbers [FINs] ET- 01, ET-02, and ET-03). The liquids collected in the storage tanks are periodically transported off-site via truck (FIN LL-01). From the inlet separator, natural gas is routed to one of four (4) compressor engines (FINs EE-01a, EE-05a, EE-07, and EE-08). The compressed gas is routed to the amine unit (FIN AMINE) for removal of carbon dioxide (CO<sub>2</sub>) from the inlet gas by bringing the gas into contact with an amine solution. The rich amine (CO<sub>2</sub> saturated) solution passes through a flash tank, where light-end volatile organic compounds (VOCs) flash-off from the solution. The rich amine solution is then heated in the amine reboiler (FIN EH-2) to release the absorbed CO<sub>2</sub>. The sweetened gas is routed to the dehydration unit (FIN DEHY-01) to remove water from the gas stream by bringing the gas into contact with glycol. The rich glycol (water saturated) is routed to a flash tank, where flash-off vapors are routed to the reboiler (FIN EH-01) fuel system for combustion. The rich glycol continues to the glycol regenerator, where water and other constituents are boiled off. Water vapor from the glycol regenerator is routed to a BTEX condenser, where condensed liquids are routed to the storage tanks and non-condensable vapors are routed to the reboiler as fuel. The dry gas resulting from the dehydration process is transported offsite via pipeline.

The Facility also includes VOC emissions from miscellaneous tanks (FINs ET-04, ET-05, ET-06, and ET-07), piping and fugitive components (FIN ESF-01), compressor blowdowns (FIN BD), engine starter vents (FIN SV), and maintenance operations (FIN MSS).

One compressor engine (FIN EE-02) has been certified as a zero-emission unit.

## SECTION 3.0 CONSTRUCTION PERMIT AUTHORIZATIONS

The Facility is authorized under Permit-By-Rule (PBR) Registration No. 96573 with the most recent certification on December 20, 2024. This single registration covers all emissions sources from routine operations and maintenance, startup, and shutdown (MSS) operations at the Facility.

There are no other active construction permit authorizations associated with the Facility.

## SECTION 4.0 STATE AND FEDERAL REGULATORY SUMMARY

The following sub sections provide a summary of State and Federal Regulatory applicability.

### SECTION 4.1 STATE REGULATORY APPLICABILITY

#### Section 4.1.1 Preconstruction Authorization

The Facility is authorized under PBR Registration No. 96573, issued on December 20, 2024. The Facility currently complies with the applicable terms and conditions of the PBR.

#### Section 4.1.2 30 Texas Administrative Code (TAC) 101 Applicability

The Facility is subject to the Emissions Inventory Requirements of 30 TAC §101.10 since it has a potential to emit greater than major source thresholds. Actual Facility emissions will be evaluated and reported as appropriate.

#### Section 4.1.3 30 TAC 111 Applicability

The Facility is subject to the visible emissions requirements of 30 TAC §111.111 and will not exceed the applicable opacity limits for each respective source.

#### Section 4.1.4 30 TAC 115 Applicability

The Facility is located in Denton County, which is currently classified as severe nonattainment for the 8-hour ozone standard.

Chapter 115, Subchapter B, Division 1 contains requirements for storage tanks in which volatile organic compounds (VOCs) are placed, stored, or held. The Facility storage vessels store VOCs with a true vapor pressure less than 1.5 pounds per square inch absolute (psia); therefore, they are exempt from the storage tank controls requirements in §115.111-119 per 30 TAC §115.111(a)(1).

Chapter 115, Subchapter B, Division 2 contains requirements for vent gas streams, including those from a glycol dehydrator still vent per §115.121(a)(1). Glycol dehydrator still vents are required to be controlled according to §115.122(a)(1). The still vent stream associated with DEHY-01 is routed to the glycol reboiler, as allowed in §115.122(a)(1)(C). EnLink will continue to maintain records of appropriate operating parameters in accordance with §115.126(1)(C).

Chapter 115, Subchapter B, Division 3 contains requirements for water separators. The Facility has separator(s) that separate material having a true vapor pressure of VOC less than 0.5 psia; therefore, the water separators are exempt from the requirements in §115.131-139 per 30 TAC §115.137(a)(2).

Chapter 115, Subchapter B, Division 7 contains requirements for various emission sources located at compressor stations including centrifugal compressors, reciprocating compressors, pneumatic controllers, and fugitive emission components. All fugitive components are subject to monitoring, recordkeeping, and requirements thereunder.

Chapter 115, Subchapter C, Division 1 contains requirements for loading and unloading of VOCs. The Facility loads and unloads VOCs with a true vapor pressure less than 0.5 psia; therefore, it is exempt from the requirements in §115.211-259, except for inspection and recordkeeping requirements, per 30 TAC §115.217(a)(1).

The Facility will maintain records sufficient to demonstrate continuous compliance with these exemptions. There are no other subject sources located at the Facility.

#### Section 4.1.5 30 TAC 117 Applicability

The Facility is located in Denton County and has nitrogen oxides (NO<sub>x</sub>) emissions of more than 25 tons per year (TPY). The Facility has not previously been classified as a major source under this regulation.

The Facility is in the geographic area of applicability and is a major source of NO<sub>x</sub> under this rule; therefore, it is subject to the requirements of §117.400-456. The Facility compressor engines are gas-fired lean-burn stationary reciprocating internal combustion engines placed into service on or after June 1, 2007; therefore, they are subject to the emissions specifications of 30 TAC §117.410(a)(4)(B)(ii)(II) and §117.410(c)(1).

The Facility amine reboiler has a maximum rated capacity of 9.87 MMBtu/hr; therefore, it is subject to the emission specifications of §117.410(a)(3)(B) and §117.410(c)(1). The Facility glycol reboiler has a maximum rated capacity of 2.00 MMBtu/hr; therefore, it is exempt from the emission specifications of §117.410(a)(3)(B) and §117.410(c)(1) per §117.403(a)(1)(B).

A summary of requirements per unit is as follows:

| EPN    | Source Description                  | Applicable Standard per 30 TAC §117  |
|--------|-------------------------------------|--|
| EE-01a | CAT G3606 TALE, 4SLB, 1775 HP       | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EE-02  | WAUK L7044GSI, 4SRB, 1680 HP        | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EE-05a | CAT G3516B, 4SLB, 1380 HP           | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EE-07  | CAT G3516B, 4SLB, 1380 HP           | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EE-08  | CAT G3516 ULB, 4SLB, 1380 HP        | 0.5 g/hp-hr. NOx<br>3.0 g/hp-hr CO   |
| EH-02  | Amine Process Heater, 9.87 MMBtu/hr | 0.036 lb/MMBtu NOx; or<br>30 ppmv NOx at 3.0% O <sub>2</sub> , dry basis; and<br>40 ppmv CO at 3.0% O <sub>2</sub> , dry basis |

The Facility is in the geographic area of applicability and is not a minor source of NOx under this rule; therefore, it is not subject to the requirements of §117.2100-2145.

The Facility will comply with the monitoring and testing requirements of §117.8000-8140 and the compliance schedule and compliance flexibility requirements of §117.9000-9810, as applicable.

There are no other subject sources located at the Facility.

#### Section 4.1.6 30 TAC 122 Applicability

The Facility meets the definition of a “Major source” per 30 TAC §122.10 (13)(D)(iii) for sites in any ozone nonattainment area classified as “severe” with a potential to emit of 25 TPY or more of oxides of nitrogen (NOx). With this application, the Facility is applying for a Federal Operating Permit (FOP) minor revision.

#### **Compliance Assurance Monitoring (CAM) Applicability**

CAM is required for any air emission source operating under an SOP if the source meets all of the following criteria, as described in Title 30 TAC 122.604:

- 122.604(b)(1) - The emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement.
- 122.604(b)(2) - The emission unit uses a control device to achieve compliance with the emission limitation or standard.

- 122.604(b)(3) - The emission unit has pre-control device potential to emit greater than or equal to the amount in tons per year required for a site to be classified as a major source.

Even if the three criteria above are met, CAM does not apply to the following:

- 122.604(c)(1) - Emission limitations or standards proposed by the EPA after November 15, 1990, under FCAA, 111 (Standards of Performance for New Stationary Sources) or 112 (Hazardous Air Pollutants).
- 122.604(c)(2) - Emission limitations or standards under FCAA, Title VI (Stratospheric Ozone Protection).
- 122.604(c)(3) - Emission limitations or standards under FCAA, Title IV (Rain Program).
- 122.604(c)(4) - Emission limitations or standards that apply solely under an emissions trading program approved or promulgated by the EPA under the FCAA that allows for trading emissions.
- 122.604(c)(5) Emission caps that meet the requirements specified in 40 Code of Federal Regulations (CFR) 70.4(b)(12) (State Program Submittals and Transition).
- 122.604(c)(6) - Emission limitations or standards for which an applicable requirement specifies a continuous compliance determination method, unless the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device.
- 122.604(c)(7) - Other emission limitations or standards specified as exempt by the EPA.

The Facility is not subject to the CAM requirements of §122.604 as follows:

1. E-01a – pre-control device CO emissions are less than major source levels – not subject.
2. EE-02 – pre-control device CO emissions are more than major source levels, however this unit certified for zero (0) emissions annually – not subject.
3. EE-05a, EE-07, and EE-08 – pre-control device CO emissions from each unit are more than major source levels, however each engine is subject to NSPS JJJJ – not subject.
4. DEHY-01 – Still vent emissions are reduced by BTEX condenser and reboiler (fuel line and glowplug backup). Flash tank emissions are recycled to the process. The definition of “control device” in MACT HH states that injecting vapor into the flame zone of an enclosed combustion device and/or returning the vapor back to the process is not considered to be a “control device.” Emissions of VOC and benzene after reductions are less than major source levels – not subject.

#### **PM Applicability**

PM applies to an emission unit at a site provided the emission unit is subject to an emission limitation or standard in an applicable requirement, as described in Title 30 TAC 122.604. PM does not apply to emission limitations or standards where the applicable requirement includes sufficient monitoring that will provide reliable data for the relevant time period associated

with compliance with the applicable requirement, as described in Title 30 TAC 122.602(b). Emissions limitations or standards that do not require PM include, but are not limited to, the following:

- 122.602(b)(1) - Emission limitations or standards proposed by the EPA after November 15, 1990 under FCAA, 111 (Standards of Performance for New Stationary Sources) or 112 (Hazardous Air Pollutants).
- 122.602(b)(2) - Emission limitations or standards under FCAA, Title IV (the Acid Rain Program).
- 122.602(b)(3) - Emission limitations or standards for which an applicable requirement specifies a continuous compliance determination method, unless the applicable compliance method includes an assumed control device emission reduction factor that could be affected by the actual operation and maintenance of the control device.
- 122.602(b)(4) - Other emission limitations or standards specified as exempt by the EPA.

There are no applicable sources at the Facility.

## SECTION 4.2 POTENTIALLY APPLICABLE FEDERAL REGULATIONS

### Section 4.2.1 40 CFR Part 60 Subpart A - General Provisions

The General Provisions of the New Source Performance Standards (NSPS) apply to all sources with applicable NSPS Subparts and detail the general notification, recordkeeping, testing, monitoring, and reporting requirements that are common to affected NSPS sources. Individual NSPS Subparts detail the specific applicability of the Subpart A General Provisions.

Specific control device requirements pertaining to flares are detailed in 40 CFR §60.18(b), however, there are no flares operated at the Facility.

### Section 4.2.2 40 CFR Part 60 Subpart K, Ka, Kb – Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)

The Facility storage tanks ET-01 – ET-03 are not subject to 40 CFR Part 60 Subparts K, Ka, or Kb. The tanks were constructed after the applicable date of Subpart Kb, but each has a storage capacity less than 75 m<sup>3</sup> (~472-bbl); therefore, they are exempt per §60.110b(a).

### Section 4.2.3 40 CFR Part 60 Subpart KKK - Equipment Leaks of VOC From Onshore Natural Gas Processing Plants

Fugitive equipment leaks at the Facility are not subject to this Subpart since the Facility is not a natural gas processing plant.

### Section 4.2.4 40 CFR Part 60 Subpart LLL - Standards of Performance for SO<sub>2</sub> Emissions

The sweetening unit (AMINE) was constructed after August 23, 2011; therefore, is not subject to this subpart.

### Section 4.2.5 40 CFR Part 60 Subpart IIII – Stationary Compression Ignition Internal Combustion Engine

There are no compression ignition engines at the Facility.

### Section 4.2.6 40 CFR Part 60 Subpart JJJJ - Stationary Spark Ignition Internal Combustion Engines

The operational reciprocating internal combustion engines at the Facility (EE-01a, EE-05a, EE-07, EE-08) are lean-burn engine and they each have a horsepower (hp) rating greater than 1,350-hp. EE-01a was manufactured March 3, 2006 (prior to July 1, 2007); therefore, it is not subject to this Subpart. EE-05a was manufactured on October 3, 2007 (between July 1, 2007 and July 1, 2010); therefore, it is subject to the stage 1 emission limits of this Subpart. EE-07 was manufactured on June 1, 2006 (before July 1, 2007) but was modified and is subject to the stage 1 emission limits of this Subpart. EE-08 was manufactured on



December 1, 2014 (after July 1, 2010); therefore, it is subject to stage 2 emission limits of this Subpart. EnLink will comply with all applicable requirements.

#### Section 4.2.7 40 CFR Part 60 Subpart OOOO - Crude Oil and Natural Gas Production, Transmission and Distribution

The Facility was modified after August 23, 2011, and is therefore potentially subject to this Subpart.

The Facility is not a well site or a gas plant and there are no centrifugal compressors at the Facility.

The reciprocating compressors associated with EE-01a and EE-07 were manufactured between March 2006 and February 2007 (before August 23, 2011); therefore, they are not subject to this Subpart. The reciprocating compressor associated with EE-05a was manufactured in March 2017 (after September 18, 2015); therefore, it is not subject to this Subpart. The reciprocating compressor associated with EE-08 was manufactured in February 2014 (after August 23, 2011 and before September 18, 2015); therefore, it is subject to this Subpart.

Pneumatic controllers were constructed before August 23, 2011; therefore, they are not subject to this subpart.

The storage vessels at the Facility were constructed prior to August 23, 2011; therefore, they are not subject to this Subpart.

#### Section 4.2.8 40 CFR Part 60 Subpart OOOOa - Crude Oil and Natural Gas Facilities

The Facility is not a well site or a gas plant and there are no centrifugal compressors at the Facility.

The reciprocating compressors associated with EE-01a, EE-07 were manufactured between March 2006 and February 2007 (before September 18, 2015); therefore, they are not subject to this Subpart. The reciprocating compressor associated with EE-05a was manufactured in March 2017 (after September 18, 2015); therefore, it is subject to this Subpart.

The sweetening unit (AMINE) was constructed after September 18, 2015 and does not produce more than two (2) long tons per day of H<sub>2</sub>S and will maintain records in accordance with this rule.

Pneumatic controllers were constructed before September 18, 2015; therefore, they are not subject to this subpart.

The storage vessels at the Facility were constructed prior to September 18, 2015; therefore, they are not subject to this Subpart.

The Facility was constructed prior to September 18, 2015; therefore, fugitives are not subject to this Subpart.

#### Section 4.2.9 40 CFR Part 60 Subpart OOOOb - Crude Oil and Natural Gas Facilities

The Facility is not a well site or a gas plant and there are no centrifugal compressors at the Facility.

The reciprocating compressors associated with EE-01a, EE-07, EE-05a, and EE-08 were manufactured before December 6, 2022; therefore, they are not subject to this Subpart.

The sweetening unit (AMINE) was constructed before December 6, 2022 and does not produce more than two (2) long tons per day of H<sub>2</sub>S and will maintain records in accordance with this rule.

Pneumatic controllers added with this Project may be subject to this Subpart and will comply with applicable requirements in §60.5390b. The Facility will convert to instrument air; process controllers that are not driven by natural gas are not included in the affected Facility per §60.5365b(d) and will no longer be subject to the requirements of §60.5390b.

The storage vessels at the Facility were constructed before December 6, 2022; therefore, they are not subject to this Subpart.

The Facility was constructed before December 6, 2022; however, the addition of EE-08 constitutes a modification to the Facility. Therefore, fugitives are subject to this Subpart and will comply with applicable requirements in §60.5397b. At this time, there are no active SOP forms for Subpart OOOOb.

#### Section 4.2.10 40 CFR Part 61 Subpart A – General Provisions

The Facility does not operate any sources subject to the National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 61.

#### Section 4.2.11 40 CFR Part 63 Subpart A – General Provisions

The General Provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) apply to all sources with applicable NESHAP Subparts and detail the general notification, recordkeeping, testing, monitoring, and reporting requirements that are common to affected NESHAP sources. Individual NESHAP Subparts detail the specific applicability of the Subpart A General Provisions.

Specific control device requirements pertaining to flares are detailed in 40 CFR §63.11(b), however, there are no flares operated at the Facility.

#### Section 4.2.12 40 CFR Part 63 Subpart HH - Oil and Natural Gas Production Facilities

The Facility is an area source of Hazardous Air Pollutants (HAP) and it operates a triethylene glycol (TEG) dehydration unit with benzene emissions less than 1 TPY; therefore, it is subject to the recordkeeping provisions of §63.774 in this Subpart.

#### Section 4.2.13 40 CFR Part 63 Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines

The Facility operates reciprocating internal combustion engines (EE-01a, EE-05a, EE-07, EE-08) that are subject to this Subpart. EE-01a was manufactured prior to June 12, 2006, is considered an existing RICE at an area source, and will continue to comply with the requirements of this rule. EE-05a, EE-07, and EE-08 are subject to NSPS Subpart JJJJ and will comply with this Subpart through compliance with NSPS Subpart JJJJ.

#### Section 4.2.14 40 CFR Part 63 Subpart DDDDD - Industrial, Commercial, and Institutional Boilers and Process Heaters Major Sources

The Facility is a minor source of HAPs and does not operate applicable units subject to this Subpart.

#### Section 4.2.15 40 CFR Part 63 Subpart JJJJJ - Industrial, Commercial, and Institutional Boilers Area Sources

The Facility is an area source of HAPs but does not operate applicable units subject to this Subpart.

#### Section 4.2.16 40 CFR Part 64 Compliance Assurance Monitoring

The Facility is subject to the CAM requirements as discussed in the 30 TAC 122 applicability section above.

#### Section 4.2.17 40 CFR Part 68 Chemical Accident Prevention Provisions

The Facility is not subject to the Chemical Accident Prevention Provisions of 40 CFR Part 68 as the Facility does not contain more than a threshold quantity of a regulated substance in a process.

**FORMS**

- OP-1 Site Information Summary
- OP-2 Application for Permit Revision/Renewal
- OP-PBRSUP Permits by Rule Supplemental Table
- OP-SUMR Individual Unit Summary for Revisions
- Applicable Unit Attribute (UA) Forms
  - OP-UA2 – Stationary Reciprocating Internal Combustion Engine Attributes
  - OP-UA5 – Process Heater/Furnace Attributes
  - OP-UA12 – Fugitive Emission Unit Attributes
- OP-REQ3 Applicable Requirements Summary

## FORM LIST

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

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

|   |
|---|
| <b>I. Company Identifying Information</b>   |
| A. Company Name: SWG Pipeline, LLC  |
| B. Customer Reference Number (CN): CN604592279  |
| C. Submittal Date (mm/dd/yyyy): 12/18/2024  |
| <b>II. Site Information</b>   |
| A. Site Name: Ponder Compressor Station   |
| B. Regulated Entity Reference Number (RN): RN106160260  |
| C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>  |
| <input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input checked="" type="checkbox"/> OK <input type="checkbox"/> N/A   |
| D. Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br><i>(Check the appropriate box[es].)</i>   |
| <input type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> HAPS |
| Other:  |
| E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| F. Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:  |
| <b>III. Permit Type</b>   |
| A. Type of Permit Requested: <i>(Select only one response)</i>  |
| <input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)   |

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

|  |
|--|
| <b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>   |
| <b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>  |
| <b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> |
| <b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |
| <b>V. Confidential Information</b>   |
| <b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| <b>VI. Responsible Official (RO) Identifying Information</b>   |
| RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| RO Full Name: Timothy Patton Copeland II   |
| RO Title: Director of Operations   |
| Employer Name: SWG Pipeline, LLC   |
| Mailing Address: 415 Private Road 3502   |
| City: Bridgeport   |
| State: TX  |
| ZIP Code: 76426  |
| Territory:   |
| Country: United States   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (940) 683-1121  |
| Fax No.:   |
| Email: Patton.Copeland@enlink.com  |

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

|   |
|---|
| <b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>   |
| Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| Technical Contact Full Name: Lance Green  |
| Technical Contact Title: Lead Environmental Permitting Specialist   |
| Employer Name: SWG Pipeline, LLC  |
| Mailing Address: 60985 Derrick Rd   |
| City: Plaquemine  |
| State: LA   |
| ZIP Code: 70764   |
| Territory:  |
| Country: United States  |
| Foreign Postal Code:  |
| Internal Mail Code:   |
| Telephone No.: (225) 692-6947   |
| Fax No.:  |
| Email: Lance.Green@enlink.com   |
| <b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>   |
| <b>A.</b> State Senator: Tan Parker   |
| <b>B.</b> State Representative: Lynn Stuckey  |
| <b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span> |
| <b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish  |



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

|   |
|---|
| <b>IX. Off-Site Permit Request</b><br><i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>                            |
| <b>A.</b> Office/Facility Name: Bridgeport Gas Plant  |
| <b>B.</b> Physical Address: 415 Private Road 3502   |
| City: Bridgeport  |
| State: TX   |
| ZIP Code: 76426   |
| Territory:  |
| Country:  |
| Foreign Postal Code:  |
| <b>C.</b> Physical Location:  |
|   |
|   |
|   |
| <b>D.</b> Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) |
| Contact Full Name: Benjamin Aucoin  |
| <b>E.</b> Telephone No.: (469) 308-6204   |
| <b>X. Application Area Information</b>  |
| <b>A.</b> Area Name: Ponder Compressor Station  |
| <b>B.</b> Physical Address: 4045 Florence Rd  |
| City: Ponder  |
| State: TX   |
| ZIP Code: 76259   |
| <b>C.</b> Physical Location:  |
|   |
|   |
|   |
| <b>D.</b> Nearest City: Ponder  |
| <b>E.</b> State: TX   |
| <b>F.</b> ZIP Code: 76259   |

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

|  |
|--|
| <b>X. Application Area Information (continued)</b>   |
| <b>G.</b> Latitude (nearest second): 33° 9' 21" N  |
| <b>H.</b> Longitude (nearest second): 97° 15' 28' W  |
| <b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> |
| <b>J.</b> Indicate the estimated number of emission units in the application area:   |
| <b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):  |
| <b>XI. Public Notice</b><br><i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>  |
| <b>A.</b> Name of a public place to view application and draft permit: Betty Foster Public Library   |
| <b>B.</b> Physical Address: 405 Shaffner St  |
| City: Ponder   |
| ZIP Code: 76259  |
| <b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):  |
| Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):   |
| Contact Person Full Name: Lance Green  |
| Contact Mailing Address: 60985 Derrick Rd  |
| City: Plaquemine   |
| State: LA  |
| ZIP Code: 70764  |
| Territory:   |
| Country:   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (225) 692-6947  |

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

**XII. Delinquent Fees and Penalties**

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

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

**XIII. Designated Representative (DR) Identifying Information**

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

DR Full Name:

DR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

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

**XIV. Alternate Designated Representative (ADR) Identifying Information**

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

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

|  |   |
|--|---|
| Date: 12/17/2024   |   |
| Permit No.: O4537  |   |
| Regulated Entity No.: RN106160260  |   |
| Company Name: SWG Pipeline, LLC  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input type="checkbox"/> YES <input checked="" 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   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**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.

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

|                                   |
|-----------------------------------|
| Date: 12/17/2024                  |
| Permit No.: O4537                 |
| Regulated Entity No.: RN106160260 |
| Company Name: SWG Pipeline, LLC   |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | EE-08      | OP-UA2          | 96573                | Add engine.   |
| 2            | MS-A          | YES      | RECIP-08   | OP-UA12         | 96573                | Add reciprocating compressor.                                 |
| 3            | MS-A          | NO       | EE-01A     | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 4            | MS-A          | NO       | EE-05A     | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 5            | MS-A          | NO       | EE-07      | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 6            | MS-A          | NO       | EH-01      | OP-UA5          | 96573                | No change – Demonstrate 30 TAC 117 non-applicability.         |
| 7            | MS-A          | NO       | EH-02      | OP-UA5          | 96573                | Add 30 TAC 117 applicability.                                 |
|              |               |          |            |                 |                      |   |
|              |               |          |            |                 |                      |   |
|              |               |          |            |                 |                      |   |

**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3  
Texas Commission on Environmental Quality**

|   |   |
|---|---|
| Date: 12/17/2024  |   |
| Permit No.: O4537   |   |
| Regulated Entity No.: RN106160260   |   |
| Company Name: SWG Pipeline, LLC   |   |
| <b>I. Significant Revision</b> <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i> |   |
| A.  | Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>                 |
| B.  | Indicate the alternate language(s) in which public notice is required:  |
| C.  | Will, there be a change in air pollutant emissions as a result of the significant revision? <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 3  
Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

| Pollutant | Description of the Change in Pollutant Emissions |
|-----------|--|
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
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|           |  |
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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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | Registration No. | PBR No.                | Registration Date |
|-------------|------------------|------------------------|-------------------|
| EE-08       | 96573            | 106.512                | 12/20/2024        |
| RECIP-08    | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
| EH-01       | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
| EH-02       | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |
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|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| N/A         |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
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|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| PBR No. | Version No./Date |
|---------|------------------|
| N/A     |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No.       | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------------|--------------------------------------|---|
| EE-08       | 106.512       | 06/13/2001                           | Measure NOx and CO no later than 7 days after each occurrence of engine maintenance which may reasonably be expected to increase emissions, changes of fuel quality in engines without oxygen sensor-based AFFR controllers which may reasonably be expected to increase emissions, oxygen sensor replacement, or catalyst cleaning or catalyst replacement, per 106.512(2)(C)(ii).   |
| RECIP-08    | 106.352 (a-k) | 11/22/2012                           | A record of the date each quarterly inspection was made and the date that components were found leaking and when repaired or the date of the next planned shutdown.   |
| EH-01       | 106.352 (a-k) | 11/22/2012                           | Records of the hours of operation of every combustion device of any size by the use of a process monitor such as a run time meter, fuel flow meter, or other process variable that indicates a unit is running unless, in the registration for the facility, the emissions from the facility were calculated using full-year operation at maximum design capacity in which case no hours of operation records must be kept. |

|       |               |            |   |
|-------|---------------|------------|---|
| EH-02 | 106.352 (a-k) | 11/22/2012 | Records of the hours of operation of every combustion device of any size by the use of a process monitor such as a run time meter, fuel flow meter, or other process variable that indicates a unit is running unless, in the registration for the facility, the emissions from the facility were calculated using full-year operation at maximum design capacity in which case no hours of operation records must be kept. |
|       |               |            |   |
|       |               |            |   |
|       |               |            |   |
|       |               |            |   |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID<br>No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations 30 TAC<br>Chapter 116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|------------------------|------------------------------------|--------------------------------|---------------------|--|---|
| A                  | 1                            | EE-08                  | OP-UA2                             | Compressor Engine 8            |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 2                            | RECIP-08               | OP-UA12                            | Reciprocating Compressor 8     |                     | 106.352/12/20/2024[96573]  |   |
| A                  | 3                            | EE-01A                 | OP-UA2                             | Compressor Engine 1A           |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 4                            | EE-05A                 | OP-UA2                             | Compressor Engine 5A           |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 5                            | EE-07                  | OP-UA2                             | Compressor Engine 7            |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 6                            | EH-01                  | OP-UA5                             | Glycol Reboiler                |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 7                            | EH-02                  | OP-UA5                             | Amine Reboiler                 |                     | 106.512/12/20/2024[96573]  |   |
|                    |                              |                        |                                    |                                |                     |  |   |
|                    |                              |                        |                                    |                                |                     |  |   |
|                    |                              |                        |                                    |                                |                     |  |   |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------|-----------------------------|------------------------------------|-----------------|------------|-------------|-----------------------------|------------------|
| EE-01a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-05a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-07       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-08       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |



**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------------------------|-------------|--------------------------|---------------------|----------------------------------|---------------------------|-----------------------------------|
| EE-01a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-05a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-07       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-08       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
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|             |                   |                                     |             |                          |                     |                                  |                           |                                   |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|----------------------|------------------------|---------------------|----------------------|-------------------------------------|----------------------------|
| EE-01a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-05a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-07       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-08       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
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|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | HAP Source | Brake HP | Construction/<br>Reconstruction<br>Date | Nonindustrial<br>Emergency<br>Engine | Service Type | Stationary RICE<br>Type |
|-------------|-------------------|------------|----------|---|--------------------------------------|--------------|-------------------------|
| EE-08       | 63ZZZZ-2          | AREA       | 500+     | 06+                                     |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |

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

**Federal Operating Permit Program**

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

**Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Construction/<br>Reconstruction/<br>Modification Date | Test Cell | Exemption | Temp<br>Replacement | Horsepower | Fuel   | AEL<br>No. | Lean<br>Burn | Commencing |
|-------------|----------------------|---|-----------|-----------|---------------------|------------|--------|------------|--------------|------------|
| EE-08       | 60JJJJ-2             | YES   | NO        | NONE      | NO                  | 1350+      | NATGAS |            |              | CON        |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |

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

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Manufacture Date | Displacement | Certified | Operation | Certified Modification | Service | Severe Duty | Optional Compliance |
|-------------|-------------------|------------------|--------------|-----------|-----------|------------------------|---------|-------------|---------------------|
| EE-08       | 60JJJJ-2          | N0710+           |              | NO        |           |                        | NON     |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |

Process Heater/Furnace Attributes  
Form OP-UA5 (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, Process Heaters  
Texas Commission on Environmental Quality

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Unit Type | Maximum<br>Rated<br>Capacity | RACT<br>Date<br>Placed in<br>Service | Functionally<br>Identical<br>Replacement | Fuel Type(s) |  |  | Annual<br>Heat<br>Input | NOx<br>Emission<br>Limitation | Opt-In<br>Unit | 23C-Option |
|-------------|----------------------|-----------|------------------------------|--------------------------------------|--|--------------|--|--|-------------------------|-------------------------------|----------------|------------|
| EH-01       | R117-2               | PRHTR     | 5-                           |                                      |  |              |  |  |                         |                               |                |            |
| EH-02       | R117-3               | PRHTR     | 5-40                         |                                      |  | NG           |  |  |                         | 410A                          |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |
|             |                      |           |                              |                                      |  |              |  |  |                         |                               |                |            |

**Process Heater/Furnace Attributes**  
**Form OP-UA5 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 117)**  
**Subchapter B: Combustion Control at Major Industrial, Commercial, and**  
**Institutional Sources in Ozone Nonattainment Areas, Process Heaters**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Diluent CEMS | 30 TAC Chapter 116 Limit | NOx Emission Limit Basis | NOx Reduction | Common Stack Combined | Fuel Type Heat Input | NOx Monitoring System |
|-------------|-------------------|--------------|--------------------------|--------------------------|---------------|-----------------------|----------------------|-----------------------|
| EH-02       | R117-3            | NO           |                          | OTHER                    | NONE          |                       |                      | MERT                  |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
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Process Heater/Furnace Attributes

Form OP-UA5 (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, Process Heaters

Texas Commission on Environmental Quality

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Fuel Flow Monitoring | CO Emission Limitation | CO Monitoring System | NH3 Emission Limitation | NH3 Monitoring |
|-------------|-------------------|----------------------|------------------------|----------------------|-------------------------|----------------|
| EH-02       | R117-3            | X40A                 | 410C                   | OTHER                |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
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**Fugitive Emission Unit Attributes**

**Form OP-UA12 (Page 170)**

**Federal Operating Permit Program**

**Table 19b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction**

**Commenced After September 18, 2015**

**Texas Commission on Environmental Quality**

| <b>Date</b> | <b>Permit No.</b> | <b>Regulated Entity No.</b> |
|-------------|-------------------|-----------------------------|
| 12/17/2024  | O4537             | RN106160260                 |

| <b>Unit ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Construction/Modification Date</b> | <b>Reciprocating Compressor</b> | <b>AMEL</b> | <b>Bypass Device</b> |
|--------------------|--------------------------|---------------------------------------|---------------------------------|-------------|----------------------|
| RECIP-08           | 60OOOOa-2                | 15-                                   |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
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**Fugitive Emission Unit Attributes  
Form OP-UA12 (Page 186)  
Federal Operating Permit Program**

**Table 20b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction,  
Modification or Reconstruction Commenced After August 23, 2011 and on or before September 18, 2015  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID. No. | SOP/GOP Index No. | Construction/<br>Modification Date | Reciprocating Compressor | Bypass Device |
|--------------|-------------------|------------------------------------|--------------------------|---------------|
| RECIP-08     | 600000-3          | 11-15                              | RC26K-                   |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
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|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |

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

**Table 1a: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date: 12/17/2024</b>                | <b>Regulated Entity No.: RN106160260</b>    | <b>Permit No.: O4537</b> |
| <b>Company Name: SWG Pipeline, LLC</b> | <b>Area Name: Ponder Compressor Station</b> |                          |

| <b>Revision No.</b> | <b>Unit/Group/Process ID No.</b> | <b>Unit/Group/Process Applicable Form</b> | <b>SOP/GOP Index No</b> | <b>Pollutant</b>          | <b>Applicable Regulatory Requirement Name</b> | <b>Applicable Regulatory Requirement Standard(s)</b>  |
|---------------------|----------------------------------|---|-------------------------|---------------------------|---|---|
| 1                   | EE-08                            | OP-UA2                                    | 63ZZZZ-2                | HAPS                      | 40 CFR Part 63, Subpart ZZZZ                  | §63.6590(c)   |
| 1                   | EE-08                            | OP-UA2                                    | 60JJJJ-2                | NO <sub>x</sub> , CO, VOC | 40 CFR Part 60, Subpart JJJJ                  | §60.4233(e)-Table 1<br>§60.4234<br>§60.4243(b)(2)(ii), (e), (g)<br>§60.4246   |
| 2                   | RECIP-08                         | OP-UA12                                   | 60OOOO-3                | VOC                       | 40 CFR Part 60, Subpart OOOO                  | §60.5385(a)(1)<br>§60.5370(b)<br>§60.5385(a)<br>§60.5415(c)(3)-(4)<br>§60.5420(a)(1)  |
| 3                   | EE-01A                           | OP-UA2                                    | R117-1                  | NO <sub>x</sub> , CO      | Chapter 117                                   | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2), (c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3), (e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6), (b)(7)<br>§117.440(j) |

|   |        |        |        |         |             |  |
|---|--------|--------|--------|---------|-------------|--|
| 4 | EE-05A | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§117.440(j) |
| 5 | EE-07  | OP-UA2 | R117-1 | NOx, CO | Chapter 117 | §117.410(a)(4)(B)(ii)(II)<br>§117.410(a), (a)(4)(F), (b)(2),<br>(c)(1), (c)(1)(A)<br>§117.410(c)(1)(B)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(4), (b)(5), (b)(6),<br>(b)(7)<br>§117.440(j) |
| 6 | EH-01  | OP-UA5 | R117-2 | NOx, CO | Chapter 117 | None [§117.403(a)(1)(B)]   |
| 7 | EH-02  | OP-UA5 | R117-3 | NOx, CO | Chapter 117 | §117.410(a)(3)(B)<br>§117.410(a), (b)(2), (c)(1)<br>§117.410(c)(1)(A)-(B), (c)(3)<br>[G]§117.410(e)(1), (e)(2), [G](e)(3),<br>(e)(4)<br>§117.430(b), (b)(2)-(3), (b)(4)-(5)<br>§117.440(j)                                 |

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

**Table 1b: Additions**

|  |   |                          |
|--|---|--------------------------|
| <b>Date:</b> 12/17/2024                | <b>Regulated Entity No.:</b> RN106160260    | <b>Permit No.:</b> O4537 |
| <b>Company Name:</b> SWG Pipeline, LLC | <b>Area Name:</b> Ponder Compressor Station |                          |

| Revision No. | Unit/Group/Processes ID No. | SOP/GOP Index No. | Pollutant                 | Monitoring and Testing Requirements                  | Recordkeeping Requirements                              | Reporting Requirements             |
|--------------|-----------------------------|-------------------|---------------------------|--|---|------------------------------------|
| 1            | EE-08                       | 63ZZZZ-2          | HAPS                      | None   | None  | None                               |
| 1            | EE-08                       | 60JJJJ-2          | NO <sub>x</sub> , CO, VOC | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4244(a)-(d) | §60.4243(b)(2)(ii)<br>§60.4243(e)<br>§60.4245(a)(1)-(4) | [G]§60.4245(c), (d)<br>§60.4245(d) |
| 2            | RECIP-08                    | 60OOOO-3          | VOC                       | §60.5410(c)(1)<br>§60.5415(c)(1)                     | §60.5420(c), [G](c)(3)                                  | §60.5420(b), [G](b)(1), [G](b)(4)  |

|   |        |        |         |  |   |   |
|---|--------|--------|---------|--|---|---|
| 3 | EE-01A | R117-1 | NOx, CO | <p>§117.435(a)(1), (a)(3), (b), (c), (d)<br/> §117.435(e), (e)(3)<br/> §117.440(a)<br/> §117.440(a)(2)(D), (f), [G](g), (h)<br/> §117.440(k)(1)-(2)<br/> §117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br/> [G]§117.8000(d)<br/> §117.8100(a), (a)(1), (a)(1)(A)-(B)<br/> §117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br/> §117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br/> §117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br/> §117.8100(b), (b)(1), [G](b)(1)(A)<br/> §117.8100(b)(1)(B), (b)(2)-(3)<br/> §117.8100(b)(3)(A)-(B)<br/> §117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br/> §117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br/> §117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br/> §117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br/> §117.8100(b)(4)(C)(iii)(II)(-a-)<br/> §117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br/> §117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br/> [G]§117.8140(a)(2)(B), (b)</p> | <p>§117.445(a), (f), (f)(1), [G](f)(2), [G](f)(3)<br/> §117.445(f)(7), (f)(8)<br/> §117.8100(a)(5)(C)</p> | <p>§117.435(f)<br/> §117.445(b), [G](c), [G](d), [G](e)<br/> §117.8010, [G](1), (2), (2)(A)-(D)<br/> [G]§117.8010(3), (4), [G](5)<br/> §117.8010(6), [G](7)-(8)<br/> §117.8100(c)</p> |
|---|--------|--------|---------|--|---|---|

|   |        |        |         |   |  |  |
|---|--------|--------|---------|---|--|--|
| 4 | EE-05A | R117-1 | NOx, CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3), (c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A), (b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I), (b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1), [G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c), [G](d), [G](e)<br>§117.8010, [G](1), (2), (2)(A)-(D)<br>[G]§117.8010(3), (4), [G](5)<br>§117.8010(6), [G](7)-(8)<br>§117.8100(c) |
|---|--------|--------|---------|---|--|--|

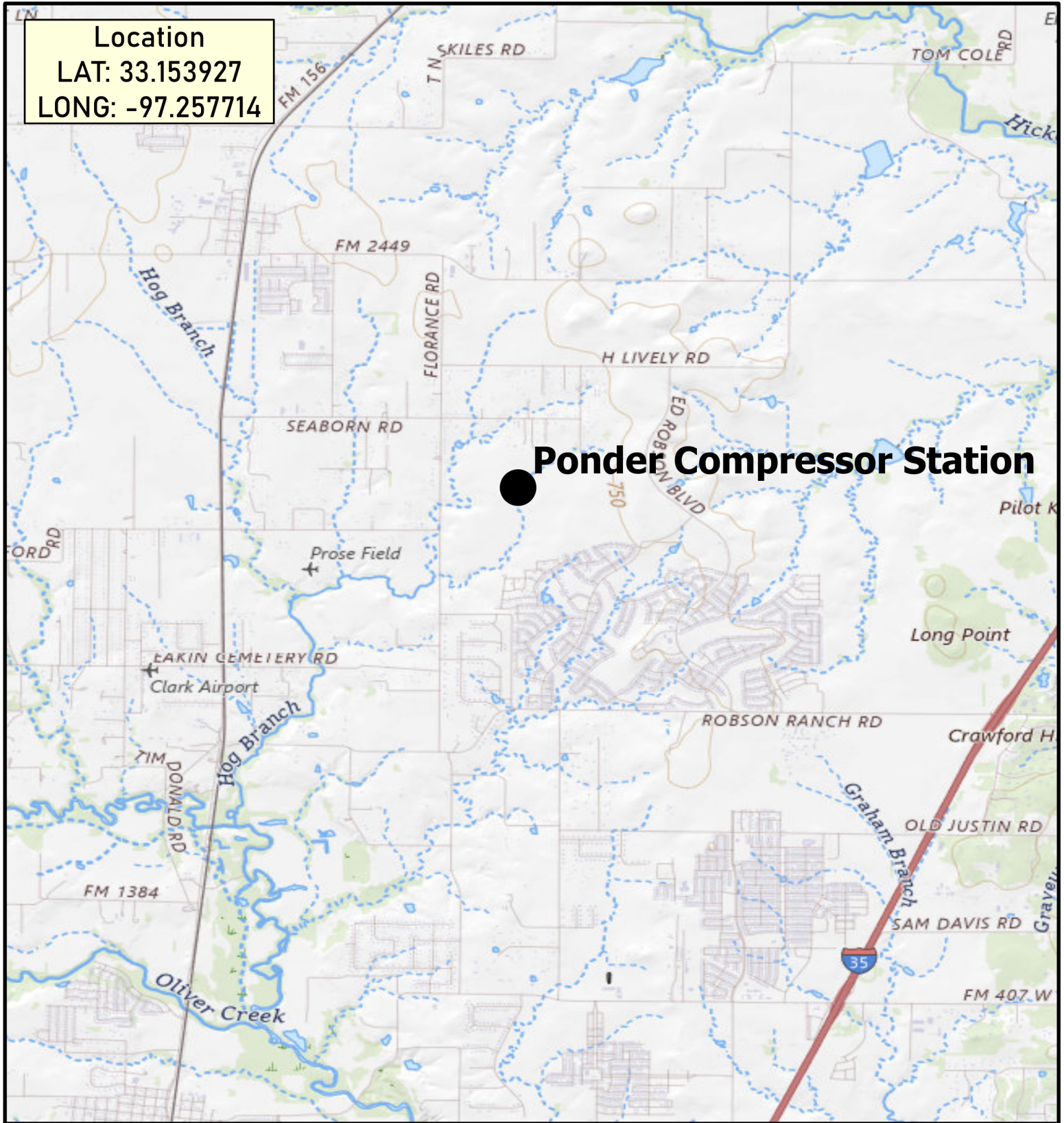
|   |       |        |                      |  |   |   |
|---|-------|--------|----------------------|--|---|---|
| 5 | EE-07 | R117-1 | NO <sub>x</sub> , CO | §117.435(a)(1), (a)(3), (b), (c), (d)<br>§117.435(e), (e)(3)<br>§117.440(a)<br>§117.440(a)(2)(D), (f), [G](g), (h)<br>§117.440(k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3),<br>(c)(5)-(6)<br>[G]§117.8000(d)<br>§117.8100(a), (a)(1), (a)(1)(A)-(B)<br>§117.8100(a)(1)(B)(ii)-(iii), (a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4)-(5)<br>§117.8100(a)(5)(A)-(B), [G] (a)(5)(D)-<br>(E), (a)(6)<br>§117.8100(b), (b)(1), [G](b)(1)(A)<br>§117.8100(b)(1)(B), (b)(2)-(3)<br>§117.8100(b)(3)(A)-(B)<br>§117.8100(b)(4), (b)(4)(A),<br>(b)(4)(A)(i)(II)<br>§117.8100(b)(4)(A)(i)(III), [G](b)(4)(B)<br>§117.8100(b)(4)(C), (b)(4)(C)(i)-(iii)<br>§117.8100(b)(4)(C)(iii)(I),<br>(b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-), (b)(5)-<br>(6)<br>§117.8140(a), (a)(1), (a)(2), (a)(2)(A)<br>[G]§117.8140(a)(2)(B), (b) | §117.445(a), (f), (f)(1),<br>[G](f)(2), [G](f)(3)<br>§117.445(f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d), [G](e)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
| 6 | EH-01 | R117-2 | NO <sub>x</sub> , CO | None   | None  | None  |



|   |       |        |         |  |  |   |
|---|-------|--------|---------|--|--|---|
| 7 | EH-02 | R117-3 | NOx, CO | §117.435(a)(1), (a)(3), (b)-(e), (e)(3)<br>§117.440(a), (f), [G](g), (k)(1)-(2)<br>§117.8000(b)-(c), (c)(1), (c)(2)-(3)<br>§117.8000(c)(5)-(6), [G](d)<br>§117.8100(a), (a)(1), (a)(1)(A), (a)(1)(B)<br>§117.8100(a)(1)(B)(ii), (a)(1)(B)(iii),<br>(a)(1)(C)<br>§117.8100(a)(2), [G](a)(3), (a)(4), (a)(5)<br>§117.8100(a)(5)(A), (a)(5)(B),<br>[G](a)(5)(D)<br>[G]§117.8100(a)(5)(E), (a)(6), (b), (b)(1)<br>[G]§117.8100(b)(1)(A), (b)(1)(B), (b)(2),<br>(b)(3)<br>§117.8100(b)(3)(A), (b)(3)(B), (b)(4),<br>(b)(4)(A)<br>§117.8100(b)(4)(A)(i)(II),<br>(b)(4)(A)(i)(III)<br>[G]§117.8100(b)(4)(B), (b)(4)(C),<br>(b)(4)(C)(i)<br>§117.8100(b)(4)(C)(ii), (b)(4)(C)(iii)<br>§117.8100(b)(4)(C)(iii)(I),<br>(b)(4)(C)(iii)(II)<br>§117.8100(b)(4)(C)(iii)(II)(-a-)<br>§117.8100(b)(4)(C)(iii)(II)(-b-)<br>§117.8100(b)(5), (b)(6) | §117.445(a), (f), (f)(1),<br>[G](f)(2), (f)(7), (f)(8)<br>§117.8100(a)(5)(C) | §117.435(f)<br>§117.445(b), [G](c),<br>[G](d)<br>§117.8010, [G](1), (2),<br>(2)(A)-(D)<br>[G]§117.8010(3), (4),<br>[G](5)<br>§117.8010(6), [G](7)-<br>(8)<br>§117.8100(c) |
|---|-------|--------|---------|--|--|---|

**FIGURES**

## FIGURE 1 – AREA MAP



Location  
LAT: 33.153927  
LONG: -97.257714

**Ponder Compressor Station**

0 0.5 1 2  
Miles



**RESOLUTE**  
COMPLIANCE, LLC  
Purposeful Solutions. Unwavering Service.

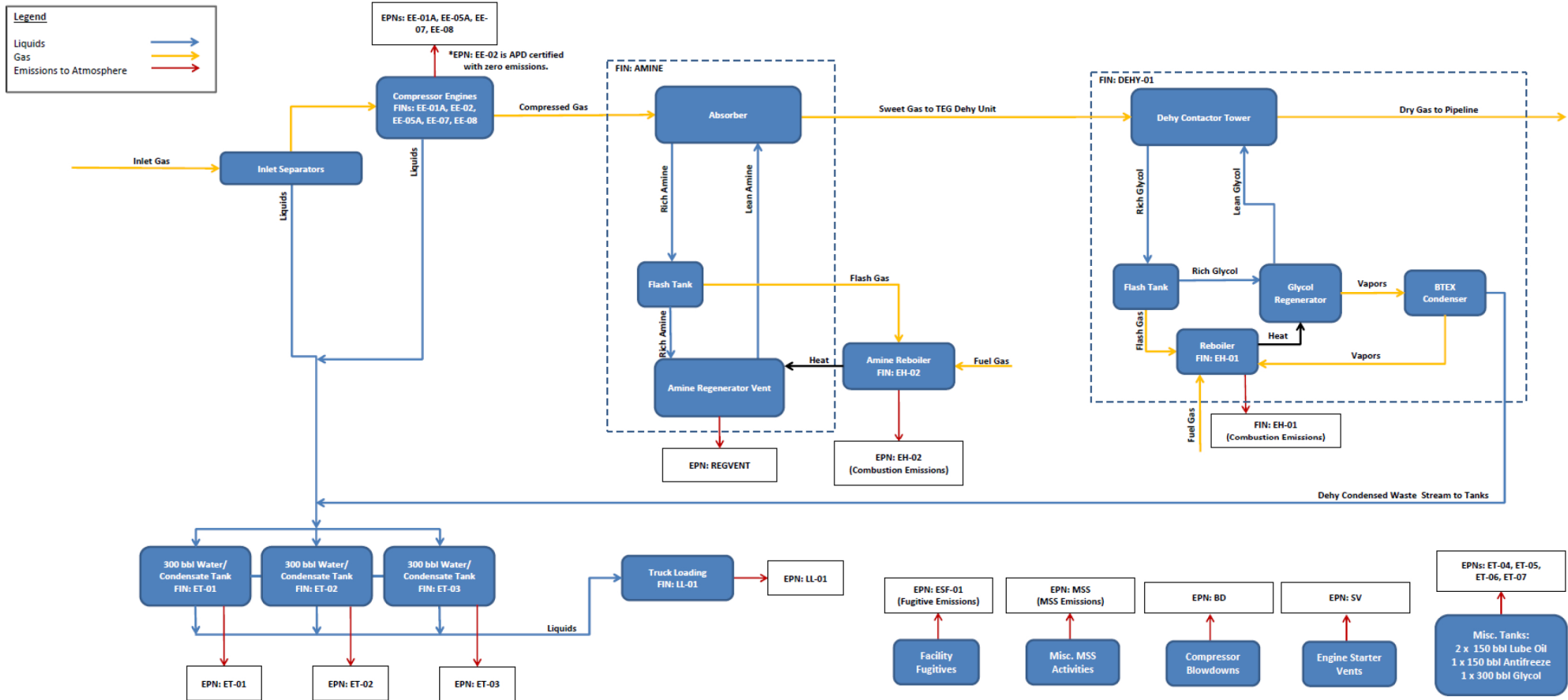
**Ponder Compressor Station**  
**SWG Pipeline, LLC**  
**Denton County, TX**

**Site Location Map**

**Project No. Env-EnLink-0358**  
**Report No. Ponder SOP Mod**  
**Date: December 2024**

**FIGURE 1**

## **FIGURE 2 – PROCESS FLOW DIAGRAM**



**RESOLUTE**  
COMPLIANCE, LLC  
Purposeful Solutions. Unwavering Service.

Ponder Compressor Station  
SWG Pipeline, LLC  
Denton County, TX

**Process Flow Diagram**

Project No.  
Report No.  
Date:

Env-EnLink-0358  
Ponder SOP Mod  
December 2024

**FIGURE 2**

**ATTACHMENTS**

# **ATTACHMENT A – MAXIMUM ALLOWABLE EMISSION RATE TABLE**



**Ponder Compressor Station**  
**Maximum Allowable Emission Rate Table**  
**Permit by Rule No.: 96573**

| EPN / Emission Source                              | VOC       |          | NO <sub>x</sub> |       | CO     |            | PM <sub>10</sub> /2.5 |      | SO <sub>2</sub> |          | Benzene  |          | Formaldehyde |          |
|--|-----------|----------|-----------------|-------|--------|------------|-----------------------|------|-----------------|----------|----------|----------|--------------|----------|
|  | lbs/hr    | tpy      | lbs/hr          | tpy   | lbs/hr | tpy        | lbs/hr                | tpy  | lbs/hr          | tpy      | lbs/hr   | tpy      | lbs/hr       | tpy      |
| EE-01a / Compressor Engine; CAT G3606              | 0.82      | 3.59     | 1.96            | 8.58  | 0.74   | 3.24       | 0.12                  | 0.53 | 0.01            | 0.04     | 0.01     | 0.04     | 0.08         | 0.35     |
| EE-05a / Compressor Engine; CAT G3516 ULB          | 0.88      | 3.85     | 1.52            | 6.66  | 1.52   | 6.66       | 0.10                  | 0.44 | 0.01            | 0.04     | 0.01     | 0.02     | 0.27         | 1.18     |
| EE-07 / Compressor Engine; CAT G3516 ULB           | 0.88      | 3.85     | 1.52            | 6.66  | 1.52   | 6.66       | 0.10                  | 0.44 | 0.01            | 0.04     | 0.01     | 0.02     | 0.27         | 1.18     |
| EE-08 / Compressor Engine; CAT G3516 ULB           | 0.61      | 2.67     | 1.52            | 6.66  | 1.52   | 6.66       | 0.10                  | 0.44 | 5.92E-03        | 0.03     | 4.07E-03 | 0.02     | 0.53         | 2.33     |
| ESF-01 / Site Fugitives                            | 0.33      | 1.47     | --              | --    | --     | --         | --                    | --   | --              | --       | 1.00E-03 | 4.00E-03 | --           | --       |
| LL-01 / Truck Loading                              | 1.88      | 0.01     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 0.01     | --           | --       |
| ET-01 / Water-Condensate Tank (300 bbl)            | 0.06      | 0.02     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 0.01     | --           | --       |
| ET-02 / Water-Condensate Tank (300 bbl)            | 0.06      | 0.02     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 0.01     | --           | --       |
| ET-03 / Water-Condensate Tank (300 bbl)            | 0.06      | 0.02     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 0.01     | --           | --       |
| ET-04 / Lube Oil Tank (150 bbl)                    | 4.00E-06  | 1.00E-06 | --              | --    | --     | --         | --                    | --   | --              | --       | --       | --       | --           | --       |
| ET-05 / Lube Oil Tank (150 bbl)                    | 4.00E-06  | 1.00E-06 | --              | --    | --     | --         | --                    | --   | --              | --       | --       | --       | --           | --       |
| ET-06 / Antifreeze Tank (150 bbl)                  | 0.10      | 3.00E-03 | --              | --    | --     | --         | --                    | --   | --              | --       | --       | --       | --           | --       |
| ET-07 / Glycol Tank (300 bbl)                      | 0.02      | 0.01     | --              | --    | --     | --         | --                    | --   | --              | --       | --       | --       | --           | --       |
| EH-01 / Glycol Reboiler, Dehydrator Vent (DEHY-01) | 0.11      | 0.49     | 0.25            | 0.88  | 0.17   | 0.74       | 0.01                  | 0.04 | 1.00E-03        | 4.00E-03 | 0.01     | 0.06     | 1.00E-04     | 4.00E-04 |
| EH-02 / Amine Reboiler, Amine Flash Tank (AMINE)   | 0.12      | 0.51     | 0.97            | 4.25  | 0.82   | 3.59       | 0.07                  | 0.31 | 0.01            | 0.04     | 3.02E-03 | 0.01     | 1.00E-03     | 4.00E-03 |
| REGVENT / Amine Regenerator Vent (AMINE)           | 0.28      | 1.20     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.17     | 0.75     | --           | --       |
| BD / Compressor Blowdowns                          | 4.97      | 0.35     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.02     | 1.00E-03 | --           | --       |
| SV / Engine Starter Vents                          | 6.21      | 0.41     | --              | --    | --     | --         | --                    | --   | --              | --       | 0.01     | 1.00E-03 | --           | --       |
| MSS / Maintenance Activities                       | 8.63      | 0.33     | --              | --    | --     | --         | 2.21                  | 1.46 | --              | --       | --       | --       | --           | --       |
| SITE-WIDE TOTAL EMISSIONS (TPY):                   | --        | 18.80    | --              | 33.69 | --     | 27.55      | --                    | 3.66 | --              | 0.19     | --       | 0.96     | --           | 5.04     |
| Maximum Operating Schedule:                        | Hours/Day | 24       | Days/Week       |       | 7      | Weeks/Year |                       | 52   | Hours/Year      |          | 8760     |          |              |          |

**Process Heater/Furnace Attributes  
Form OP-UA5 (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, Process Heaters  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Unit Type | Maximum Rated Capacity | RACT Date Placed in Service | Functionally Identical Replacement | Fuel Type(s) |  |  | Annual Heat Input | NOx Emission Limitation | Opt-In Unit | 23C-Option |
|-------------|-------------------|-----------|------------------------|-----------------------------|------------------------------------|--------------|--|--|-------------------|-------------------------|-------------|------------|
| EH-01       | R117-2            | PRHTR     | 5-                     |                             |                                    |              |  |  |                   |                         |             |            |
| EH-02       | R117-3            | PRHTR     | 5-40                   |                             |                                    | NG           |  |  |                   | 410A                    |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |
|             |                   |           |                        |                             |                                    |              |  |  |                   |                         |             |            |

**Process Heater/Furnace Attributes**  
**Form OP-UA5 (Page 2)**  
**Federal Operating Permit Program**  
**Table 1b: Title 30 Texas Administrative Code Chapter 112 (30 TAC Chapter 117)**  
**Subchapter B: Combustion Control at Major Industrial, Commercial, and**  
**Institutional Sources in Ozone Nonattainment Areas, Process Heaters**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Diluent CEMS | 30 TAC Chapter 116 Limit | NOx Emission Limit Basis | NOx Reduction | Common Stack Combined | Fuel Type Heat Input | NOx Monitoring System |
|-------------|-------------------|--------------|--------------------------|--------------------------|---------------|-----------------------|----------------------|-----------------------|
| EH-02       | R117-3            | NO           |                          | OTHER                    | NONE          |                       |                      | MERT                  |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |
|             |                   |              |                          |                          |               |                       |                      |                       |

**Process Heater/Furnace Attributes**  
**Form OP-UA5 (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, Process Heaters**  
**Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Fuel Flow Monitoring | CO Emission Limitation | CO Monitoring System | NH3 Emission Limitation | NH3 Monitoring |
|-------------|-------------------|----------------------|------------------------|----------------------|-------------------------|----------------|
| EH-02       | R117-3            | X40A                 | 410C                   | OTHER                |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
|             |                   |                      |                        |                      |                         |                |
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**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------|-----------------------------|------------------------------------|-----------------|------------|-------------|-----------------------------|------------------|
| EE-01a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-05a      | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-07       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
| EE-08       | R117-1            | 50+               |                             |                                    | ENG             | NG         | LEANBURN    | 2015+                       |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |
|             |                   |                   |                             |                                    |                 |            |             |                             |                  |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|-------------------------------------|-------------|--------------------------|---------------------|----------------------------------|---------------------------|-----------------------------------|
| EE-01a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-05a      | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-07       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
| EE-08       | R117-1            | 410A                                |             |                          |                     | 1HR                              | OTHER                     | MERT                              |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
|             |                   |                                     |             |                          |                     |                                  |                           |                                   |
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|             |                   |                                     |             |                          |                     |                                  |                           |                                   |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| 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 |
|-------------|-------------------|----------------------|------------------------|---------------------|----------------------|-------------------------------------|----------------------------|
| EE-01a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-05a      | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-07       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
| EE-08       | R117-1            | X40A                 | 405D                   | 1HR                 | OTHER                |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
|             |                   |                      |                        |                     |                      |                                     |                            |
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**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | HAP Source | Brake HP | Construction/<br>Reconstruction<br>Date | Nonindustrial<br>Emergency<br>Engine | Service Type | Stationary RICE<br>Type |
|-------------|-------------------|------------|----------|---|--------------------------------------|--------------|-------------------------|
| EE-08       | 63ZZZZ-2          | AREA       | 500+     | 06+                                     |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
|             |                   |            |          |   |                                      |              |                         |
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**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP<br>Index No. | Construction/<br>Reconstruction/<br>Modification Date | Test Cell | Exemption | Temp<br>Replacement | Horsepower | Fuel   | AEL<br>No. | Lean<br>Burn | Commencing |
|-------------|----------------------|---|-----------|-----------|---------------------|------------|--------|------------|--------------|------------|
| EE-08       | 60JJJJ-2             | YES   | NO        | NONE      | NO                  | 1350+      | NATGAS |            |              | CON        |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |
|             |                      |   |           |           |                     |            |        |            |              |            |

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

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID No. | SOP/GOP Index No. | Manufacture Date | Displacement | Certified | Operation | Certified Modification | Service | Severe Duty | Optional Compliance |
|-------------|-------------------|------------------|--------------|-----------|-----------|------------------------|---------|-------------|---------------------|
| EE-08       | 60JJJJ-2          | N0710+           |              | NO        |           |                        | NON     |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
|             |                   |                  |              |           |           |                        |         |             |                     |
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**Fugitive Emission Unit Attributes**

**Form OP-UA12 (Page 170)**

**Federal Operating Permit Program**

**Table 19b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction**

**Commenced After September 18, 2015**

**Texas Commission on Environmental Quality**

| <b>Date</b> | <b>Permit No.</b> | <b>Regulated Entity No.</b> |
|-------------|-------------------|-----------------------------|
| 12/17/2024  | O4537             | RN106160260                 |

| <b>Unit ID No.</b> | <b>SOP/GOP Index No.</b> | <b>Construction/Modification Date</b> | <b>Reciprocating Compressor</b> | <b>AMEL</b> | <b>Bypass Device</b> |
|--------------------|--------------------------|---------------------------------------|---------------------------------|-------------|----------------------|
| RECIP-08           | 60OOOOa-2                | 15-                                   |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
|                    |                          |                                       |                                 |             |                      |
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|                    |                          |                                       |                                 |             |                      |

**Fugitive Emission Unit Attributes  
Form OP-UA12 (Page 186)  
Federal Operating Permit Program**

**Table 20b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)**

**Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction,  
Modification or Reconstruction Commenced After August 23, 2011 and on or before September 18, 2015  
Texas Commission on Environmental Quality**

| Date       | Permit No. | Regulated Entity No. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit ID. No. | SOP/GOP Index No. | Construction/<br>Modification Date | Reciprocating Compressor | Bypass Device |
|--------------|-------------------|------------------------------------|--------------------------|---------------|
| RECIP-08     | 600000-3          | 11-15                              | RC26K-                   |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
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|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |
|              |                   |                                    |                          |               |

**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. |
|------------|------------|----------------------|
| 12/17/2024 | O4537      | RN106160260          |

| Unit/Process<br>AI | Unit/Process<br>Revision No. | Unit/Process ID<br>No. | Unit/Process<br>Applicable<br>Form | Unit/Process Name/ Description | Unit/Process<br>CAM | Preconstruction<br>Authorizations 30 TAC<br>Chapter 116/ 30 TAC<br>Chapter 106 | Preconstruction<br>Authorizations Title I |
|--------------------|------------------------------|------------------------|------------------------------------|--------------------------------|---------------------|--|---|
| A                  | 1                            | EE-08                  | OP-UA2                             | Compressor Engine 8            |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 2                            | RECIP-08               | OP-UA12                            | Reciprocating Compressor 8     |                     | 106.352/12/20/2024[96573]  |   |
| A                  | 3                            | EE-01A                 | OP-UA2                             | Compressor Engine 1A           |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 4                            | EE-05A                 | OP-UA2                             | Compressor Engine 5A           |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 5                            | EE-07                  | OP-UA2                             | Compressor Engine 7            |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 6                            | EH-01                  | OP-UA5                             | Glycol Reboiler                |                     | 106.512/12/20/2024[96573]  |   |
| A                  | 7                            | EH-02                  | OP-UA5                             | Amine Reboiler                 |                     | 106.512/12/20/2024[96573]  |   |
|                    |                              |                        |                                    |                                |                     |  |   |
|                    |                              |                        |                                    |                                |                     |  |   |
|                    |                              |                        |                                    |                                |                     |  |   |

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

|  |   |
|--|---|
| Date: 12/17/2024   |   |
| Permit No.: O4537  |   |
| Regulated Entity No.: RN106160260  |   |
| Company Name: SWG Pipeline, LLC  |   |
| For Submissions to EPA   |   |
| Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input type="checkbox"/> YES <input checked="" 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   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| For GOP Revisions Only   | <input type="checkbox"/> YES <input type="checkbox"/> NO            |

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

**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.

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

|                                   |
|-----------------------------------|
| Date: 12/17/2024                  |
| Permit No.: O4537                 |
| Regulated Entity No.: RN106160260 |
| Company Name: SWG Pipeline, LLC   |

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

| Revision No. | Revision Code |          | Unit/Group | Process         | NSR<br>Authorization | Description of Change and Provisional<br>Terms and Conditions |
|--------------|---------------|----------|------------|-----------------|----------------------|---|
|              |               | New Unit | ID No.     | Applicable Form |                      |   |
| 1            | MS-A          | YES      | EE-08      | OP-UA2          | 96573                | Add engine.   |
| 2            | MS-A          | YES      | RECIP-08   | OP-UA12         | 96573                | Add reciprocating compressor.                                 |
| 3            | MS-A          | NO       | EE-01A     | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 4            | MS-A          | NO       | EE-05A     | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 5            | MS-A          | NO       | EE-07      | OP-UA2          | 96573                | Add 30 TAC 117 applicability.                                 |
| 6            | MS-A          | NO       | EH-01      | OP-UA5          | 96573                | No change – Demonstrate 30 TAC 117 non-applicability.         |
| 7            | MS-A          | NO       | EH-02      | OP-UA5          | 96573                | Add 30 TAC 117 applicability.                                 |
|              |               |          |            |                 |                      |   |
|              |               |          |            |                 |                      |   |
|              |               |          |            |                 |                      |   |



**Federal Operating Permit Program  
Application for Permit Revision/Renewal  
Form OP-2-Table 3  
Texas Commission on Environmental Quality**

|   |   |
|---|---|
| Date: 12/17/2024  |   |
| Permit No.: O4537   |   |
| Regulated Entity No.: RN106160260   |   |
| Company Name: SWG Pipeline, LLC   |   |
| <b>I. Significant Revision</b> <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i> |   |
| A.  | Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>                 |
| B.  | Indicate the alternate language(s) in which public notice is required:  |
| C.  | Will, there be a change in air pollutant emissions as a result of the significant revision? <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 3  
Texas Commission on Environmental Quality**

Using the table below, indicate the air pollutant(s) that will be changing and include a brief description of the change in pollutant emissions for each pollutant:

| Pollutant | Description of the Change in Pollutant Emissions |
|-----------|--|
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
|           |  |
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|           |  |
|           |  |

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

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

|   |
|---|
| <b>I. Company Identifying Information</b>   |
| <b>A.</b> Company Name: SWG Pipeline, LLC   |
| <b>B.</b> Customer Reference Number (CN): <b>CN604592279</b>  |
| <b>C.</b> Submittal Date ( <i>mm/dd/yyyy</i> ): 12/18/2024  |
| <b>II. Site Information</b>   |
| <b>A.</b> Site Name: Ponder Compressor Station  |
| <b>B.</b> Regulated Entity Reference Number (RN): <b>RN106160260</b>  |
| <b>C.</b> Indicate affected state(s) required to review permit application: ( <i>Check the appropriate box[es].</i> )   |
| <input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input checked="" type="checkbox"/> OK <input type="checkbox"/> N/A   |
| <b>D.</b> Indicate all pollutants for which the site is a major source based on the site's potential to emit:<br>( <i>Check the appropriate box[es].</i> )  |
| <input type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> HAPS |
| Other:  |
| <b>E.</b> Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>F.</b> Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>G.</b> Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| <b>H.</b> Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:   |
| <b>III. Permit Type</b>   |
| <b>A.</b> Type of Permit Requested: ( <i>Select only one response</i> )   |
| <input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)   |

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

|  |
|--|
| <b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>   |
| <b>A.</b> Is this submittal an abbreviated or a full application? <span style="float: right;"><input type="checkbox"/> Abbreviated <input type="checkbox"/> Full</span>  |
| <b>B.</b> If this is a full application, is the submittal a follow-up to an abbreviated application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>C.</b> If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>   |
| <b>D.</b> Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.) <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span> |
| <b>E.</b> Has the required Public Involvement Plan been included with this application? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>  |
| <b>V. Confidential Information</b>   |
| <b>A.</b> Is confidential information submitted in conjunction with this application? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>   |
| <b>VI. Responsible Official (RO) Identifying Information</b>   |
| RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| RO Full Name: Timothy Patton Copeland II   |
| RO Title: Director of Operations   |
| Employer Name: SWG Pipeline, LLC   |
| Mailing Address: 415 Private Road 3502   |
| City: Bridgeport   |
| State: TX  |
| ZIP Code: 76426  |
| Territory:   |
| Country: United States   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (940) 683-1121  |
| Fax No.:   |
| Email: Patton.Copeland@enlink.com  |

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

|  |
|--|
| <b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>  |
| Technical Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)  |
| Technical Contact Full Name: Lance Green   |
| Technical Contact Title: Lead Environmental Permitting Specialist  |
| Employer Name: SWG Pipeline, LLC   |
| Mailing Address: 60985 Derrick Rd  |
| City: Plaquemine   |
| State: LA  |
| ZIP Code: 70764  |
| Territory:   |
| Country: United States   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (225) 692-6947  |
| Fax No.:   |
| Email: Lance.Green@enlink.com  |
| <b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>  |
| <b>A.</b> State Senator: Tan Parker  |
| <b>B.</b> State Representative: Lynn Stuckey   |
| <b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year<br>(Sept. 1 - August 31)? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</span> |
| <b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span>  |
| <b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish   |

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

|   |
|---|
| <b>IX. Off-Site Permit Request</b><br><i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>                            |
| <b>A.</b> Office/Facility Name: Bridgeport Gas Plant  |
| <b>B.</b> Physical Address: 415 Private Road 3502   |
| City: Bridgeport  |
| State: TX   |
| ZIP Code: 76426   |
| Territory:  |
| Country:  |
| Foreign Postal Code:  |
| <b>C.</b> Physical Location:  |
|   |
|   |
|   |
| <b>D.</b> Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.) |
| Contact Full Name: Benjamin Aucoin  |
| <b>E.</b> Telephone No.: (469) 308-6204   |
| <b>X. Application Area Information</b>  |
| <b>A.</b> Area Name: Ponder Compressor Station  |
| <b>B.</b> Physical Address: 4045 Florence Rd  |
| City: Ponder  |
| State: TX   |
| ZIP Code: 76259   |
| <b>C.</b> Physical Location:  |
|   |
|   |
|   |
| <b>D.</b> Nearest City: Ponder  |
| <b>E.</b> State: TX   |
| <b>F.</b> ZIP Code: 76259   |

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

|  |
|--|
| <b>X. Application Area Information <i>(continued)</i></b>  |
| <b>G.</b> Latitude (nearest second): 33° 9' 21" N  |
| <b>H.</b> Longitude (nearest second): 97° 15' 28' W  |
| <b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span> |
| <b>J.</b> Indicate the estimated number of emission units in the application area:   |
| <b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>  |
| <b>L.</b> Affected Source Plant Code (or ORIS/Facility Code):  |
| <b>XI. Public Notice</b><br><i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>  |
| <b>A.</b> Name of a public place to view application and draft permit: Betty Foster Public Library   |
| <b>B.</b> Physical Address: 405 Shaffner St  |
| City: Ponder   |
| ZIP Code: 76259  |
| <b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):  |
| Contact Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.):   |
| Contact Person Full Name: Lance Green  |
| Contact Mailing Address: 60985 Derrick Rd  |
| City: Plaquemine   |
| State: LA  |
| ZIP Code: 70764  |
| Territory:   |
| Country:   |
| Foreign Postal Code:   |
| Internal Mail Code:  |
| Telephone No.: (225) 692-6947  |

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

|   |
|---|
| <b>XII. Delinquent Fees and Penalties</b>   |
| <b>Notice:</b> This form will not be processed until all delinquent fees and/or penalties owed to TCEQ or the Office of Attorney General on behalf of TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol." |
| <b>Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.</b>  |
| <b>XIII. Designated Representative (DR) Identifying Information</b>   |
| DR Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)   |
| DR Full Name:   |
| DR Title:   |
| Employer Name:  |
| Mailing Address:  |
| City:   |
| State:  |
| ZIP Code:   |
| Territory:  |
| Country:  |
| Foreign Postal Code:  |
| Internal Mail Code:   |
| Telephone No.:  |
| Fax No.:  |
| Email:  |



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

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

**XIV. Alternate Designated Representative (ADR) Identifying Information**

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

ADR Full Name:

ADR Title:

Employer Name:

Mailing Address:

City:

State:

ZIP Code:

Territory:

Country:

Foreign Postal Code:

Internal Mail Code:

Telephone No.:

Fax No.:

Email:

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | Registration No. | PBR No.                | Registration Date |
|-------------|------------------|------------------------|-------------------|
| EE-08       | 96573            | 106.512                | 12/20/2024        |
| RECIP-08    | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
| EH-01       | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
| EH-02       | 96573            | 106.352(a)-(k) Level 2 | 12/20/2024        |
|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |
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|             |                  |                        |                   |
|             |                  |                        |                   |
|             |                  |                        |                   |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No. | Version No./Date |
|-------------|---------|------------------|
| N/A         |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |
|             |         |                  |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| PBR No. | Version No./Date |
|---------|------------------|
| N/A     |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |
|         |                  |

**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 |
|------------|---------------|-------------------------|
| 12/17/2024 | O4537         | RN106160260             |

| Unit ID No. | PBR No.       | Version No./Date Or Registration No. | Monitoring Requirement  |
|-------------|---------------|--------------------------------------|---|
| EE-08       | 106.512       | 06/13/2001                           | Measure NOx and CO no later than 7 days after each occurrence of engine maintenance which may reasonably be expected to increase emissions, changes of fuel quality in engines without oxygen sensor-based AFFR controllers which may reasonably be expected to increase emissions, oxygen sensor replacement, or catalyst cleaning or catalyst replacement, per 106.512(2)(C)(ii).   |
| RECIP-08    | 106.352 (a-k) | 11/22/2012                           | A record of the date each quarterly inspection was made and the date that components were found leaking and when repaired or the date of the next planned shutdown.   |
| EH-01       | 106.352 (a-k) | 11/22/2012                           | Records of the hours of operation of every combustion device of any size by the use of a process monitor such as a run time meter, fuel flow meter, or other process variable that indicates a unit is running unless, in the registration for the facility, the emissions from the facility were calculated using full-year operation at maximum design capacity in which case no hours of operation records must be kept. |

|       |               |            |   |
|-------|---------------|------------|---|
| EH-02 | 106.352 (a-k) | 11/22/2012 | Records of the hours of operation of every combustion device of any size by the use of a process monitor such as a run time meter, fuel flow meter, or other process variable that indicates a unit is running unless, in the registration for the facility, the emissions from the facility were calculated using full-year operation at maximum design capacity in which case no hours of operation records must be kept. |
|       |               |            |   |
|       |               |            |   |
|       |               |            |   |
|       |               |            |   |

## Texas Commission on Environmental Quality

Title V Existing

4537

### Site Information (Regulated Entity)

|   |                           |
|---|---------------------------|
| What is the name of the permit area to be authorized? | PONDER COMPRESSOR STATION |
| Does the site have a physical address?                | Yes                       |
| Physical Address                                      |                           |
| Number and Street                                     | 4045 FLORENCE ROAD        |
| City  | PONDER                    |
| State   | TX                        |
| ZIP   | 76259                     |
| County  | DENTON                    |
| Latitude (N) (##.#####)                               | 33.155833                 |
| Longitude (W) (-###.#####)                            | 97.257777                 |
| Primary SIC Code                                      | 1311                      |
| Secondary SIC Code                                    |                           |
| Primary NAICS Code                                    | 211130                    |
| Secondary NAICS Code                                  |                           |
| Regulated Entity Site Information                     |                           |
| What is the Regulated Entity's Number (RN)?           | RN106160260               |
| What is the name of the Regulated Entity (RE)?        | PONDER COMPRESSOR STATION |
| Does the RE site have a physical address?             | Yes                       |
| Physical Address                                      |                           |
| Number and Street                                     | 4045 FLORENCE RD          |
| City  | PONDER                    |
| State   | TX                        |
| ZIP   | 76259                     |
| County  | DENTON                    |
| Latitude (N) (##.#####)                               | 33.153783                 |
| Longitude (W) (-###.#####)                            | -97.259183                |
| Facility NAICS Code                                   |                           |
| What is the primary business of this entity?          | OIL & GAS PRODUCTION      |

### Customer (Applicant) Information

|  |                      |
|--|----------------------|
| How is this applicant associated with this site? | Owner Operator       |
| What is the applicant's Customer Number (CN)?    | CN604592279          |
| Type of Customer                                 | Corporation          |
| Full legal name of the applicant:                |                      |
| Legal Name                                       | SWG Pipeline, L.L.C. |
| Texas SOS Filing Number                          | 801898911            |
| Federal Tax ID                                   |                      |
| State Franchise Tax ID                           | 32052683698          |
| State Sales Tax ID                               |                      |

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

## Responsible Official Contact

Person TCEQ should contact for questions about this application:

|  |                            |
|--|----------------------------|
| Organization Name  | SWG PIPELINE LLC           |
| Prefix   | MR                         |
| First  | TIMOTHY                    |
| Middle   |                            |
| Last   | PATTON COPELAND II         |
| Suffix   |                            |
| Credentials  |                            |
| Title  | DIRECTOR OF OPERATIONS     |
| Enter new address or copy one from list:                     |                            |
| Mailing Address  |                            |
| Address Type   | Domestic                   |
| Mailing Address (include Suite or Bldg. here, if applicable) | 415 PRIVATE ROAD 3502      |
| Routing (such as Mail Code, Dept., or Attn:)                 |                            |
| City   | BRIDGEPORT                 |
| State  | TX                         |
| ZIP  | 76426                      |
| Phone (###-###-####)   | 9406831121                 |
| Extension  |                            |
| Alternate Phone (###-###-####)                               |                            |
| Fax (###-###-####)   |                            |
| E-mail   | patton.copeland@enlink.com |

## Technical Contact

Person TCEQ should contact for questions about this application:

|  |  |
|--|--|
| Select existing TC contact or enter a new contact. | LANCE GREEN(SWG PIPELINE LL... )         |
| Organization Name                                  | SWG PIPELINE LLC                         |
| Prefix   | MR                                       |
| First  | LANCE                                    |
| Middle   |  |
| Last   | GREEN                                    |
| Suffix   |  |
| Credentials  |  |
| Title  | LEAD ENVIRONMENTAL PERMITTING SPECIALIST |
| Enter new address or copy one from list:           |  |
| Mailing Address                                    |  |
| Address Type                                       | Domestic                                 |



|  |                        |
|--|------------------------|
| Mailing Address (include Suite or Bldg. here, if applicable) | 1722 ROUTH ST          |
| Routing (such as Mail Code, Dept., or Attn:)                 | STE 1300               |
| City   | DALLAS                 |
| State  | TX                     |
| ZIP  | 75201                  |
| Phone (###-###-####)   | 2256926947             |
| Extension  |                        |
| Alternate Phone (###-###-####)                               |                        |
| Fax (###-###-####)   |                        |
| E-mail   | lance.green@enlink.com |

## Title V General Information - Existing

|   |                      |
|---|----------------------|
| 1) Permit Type:   | SOP                  |
| 2) Permit Latitude Coordinate:  | 33 Deg 9 Min 21 Sec  |
| 3) Permit Longitude Coordinate:   | 97 Deg 15 Min 28 Sec |
| 4) Is this submittal a new application or an update to an existing application?   | New Application      |
| 4.1. What type of permitting action are you applying for?   | Streamlined Revision |
| 4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?    | No                   |
| 4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation? | No                   |
| 5) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?                        | No                   |

## Title V Attachments Existing

### Attach OP-1 (Site Information Summary)

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=230770>OP-1.pdf</a>  |
| Hash      | 82C8628EACACFFB052FAFC819CA29E88EFAAAA1CB280F693FAE1D36B5BB37D47 |
| MIME-Type | application/pdf  |

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

[File Properties]

|           |  |
|-----------|--|
| File Name | <a href=/ePermitsExternal/faces/file?fileId=230771>OP-2.pdf</a>  |
| Hash      | A50B413C6A3C779267B848E1D48ABD4D84D64C25C1D6B73383288D133731ED7B |
| MIME-Type | application/pdf  |

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

### Attach OP-REQ2 (Negative Applicable Requirement Determinations)

### Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230772>OP\_REQ3\_Ponder - OP-REQ3.pdf</a>

Hash 5620A0B302C5AA9D01727B9859A3A3DEBAADD1BA0A0A09235D8B888D5EC1EBD7

MIME-Type application/pdf

## Attach OP-PBR SUP (Permits by Rule Supplemental Table)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230773>OP\_PBR SUP\_Ponder - OP-PBR SUP.pdf</a>

Hash 1B4B47B849FD35B9B4E5855FCD2FCABC2E4354F49E7061B11865BF5440FFB89E

MIME-Type application/pdf

## Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230775>OP-SUMR.pdf</a>

Hash FF013FE668FF976556D8C2AFE98DF44C4022B76ACD13EE8CA2EA0BBC18B375FE

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=230776>OP-UA5.pdf</a>

Hash 2259F622A4BCC14801A899844B58CAD6FBCB0C18908166EE9F5A1F91D09A72D5

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230778>Ponder - OP-UA12.pdf</a>

Hash 943E7A61D1551E0E76A8B4380CAD359EADA64F111749CEEE72A6E019350EB43B

MIME-Type application/pdf

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=230777>Ponder - OP-UA2.pdf</a>

Hash 68E926FD932FB8DFDD4B30CAAF8899C5D8B3EF7FC448BA96FAA6921A98E2EFB4

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=230780>Ponder\_TitleVMod\_20241218.pdf</a>

Hash D7B93EEB50BAA13C8B272F9F812D1E4A0D6C51FE0FA661F38DE847906F5182D0

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 Timothy P Copeland II, the owner of the STEERS account ER099507.
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 4537.
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: Timothy P Copeland II OWNER OPERATOR

Account Number:ER099507

Signature IP Address:174.47.165.2

Signature Date:2024-12-18

Signature Hash:C0C1C9D100E9B9FFA8AA12976FF706B8E260803CE94F45DDABCFA1970BE46ACE

Form Hash Code at time of Signature:BC81186FEF6BA6CD2C0B7487B871BE813DADC772D9305FBBAE2D362747969859

Submission

Reference Number:The application reference number is 731830

Submitted by:The application was submitted by ER099507/Timothy P Copeland II

Submitted Timestamp:The application was submitted on 2024-12-18 at 14:00:27 CST

Submitted From:The application was submitted from IP address 174.47.165.2

Confirmation Number:The confirmation number is 601795

Steers Version:The STEERS version is 6.84

Permit Number:The permit number is 4537

Additional Information

Application Creator: This account was created by Sara Shaw

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