

Texas Commission on Environmental Quality

Title V Existing

4457

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PLAINS TEXAS FACILITY
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	from plains, tx, go sw on u.s. hwy 82 for approx. 3.3 mi. turn left s onto fm 1622. continue for approx. 5.15 mi to intx with fm 300. site is located approx 4,500 feet southwest of the intx between fm 1622 and fm 300.
City	Plains
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	33.074166
Longitude (W) (-###.#####)	102.891111
Primary SIC Code	0
Secondary SIC Code	
Primary NAICS Code	221112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111658415
What is the name of the Regulated Entity (RE)?	RPC POWER
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM PLAINS, TX, GO SW ON U.S. HWY 82 FOR APPROXIMATELY 3.3 MILES. TURN LEFT S ONTO FM 1622. CONTINUE FOR APPROXIMATELY 5.15 MILES AND TURN RIGHT W ONTO FM 280. SITE WILL BE LOCATED ON THE LEFT S.
City	PLAINS
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	
Longitude (W) (-###.#####)	
Facility NAICS Code	
What is the primary business of this entity?	POWER GENERATION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606104370
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Rpc Power LLC

Texas SOS Filing Number	804894731
Federal Tax ID	921157867
State Franchise Tax ID	
State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	RPC Toll LLC
Prefix	MR
First	Matthew
Middle	
Last	Bullpitt
Suffix	
Credentials	
Title	Chief Operating Officer
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	820 GESSNER RD STE 895
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77024
Phone (###-###-####)	8179752084
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mbulpitt@conduitpower.co

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	New Contact
Organization Name	RPC Toll LLC
Prefix	MS
First	Darla
Middle	
Last	Kuntz
Suffix	
Credentials	
Title	HSE Manager
Enter new address or copy one from list	

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

Zip

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.co

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

RPC Toll LLC

Prefix

MS

First

Darla

Middle

Last

Kuntz

Suffix

Credentials

Title

HSE Manager

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

ZIP

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.co

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

33 Deg 4 Min 27 Sec

3) Permit Longitude Coordinate:

102 Deg 53 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.

4457-38003

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

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)

[File Properties]

File Name

OP-REQ2 (Plains I Title V Revision) 101725.pdf

Hash

9233CB048DF1B9671F8D55B24DCD9DDF01F7B5AB965A239201C36C42E363E3CB

MIME-Type

application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name

OP-ACPS Form (Plains Texas I JJJJ Title V Revision) 101725.pdf

Hash

66330F30074375852550E6FAA7461D7FFF4A9E22651485D8D832B6B3AFE44FAB

MIME-Type

application/pdf

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

Certification

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

1. I am Darla K Kuntz, the owner of the STEERS account ER106444.
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 4457.
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: Darla K Kuntz OWNER OPERATOR

Account Number:	ER106444
Signature IP Address:	98.199.123.164
Signature Date:	2025-10-17
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	014F7CF130BC430F81ACE5FE443F0451E674F817923917B325E5C297CD21883B

Submission

Reference Number:	The application reference number is 827534
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-10-17 at 10:29:19 CDT
Submitted From:	The application was submitted from IP address 98.199.123.164
Confirmation Number:	The confirmation number is 686053
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 4457

Additional Information

Application Creator: This account was created by Loren Ladd

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
10/17/2025	04457	RN111658415

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		GRP-EGU	REQ2	40 CFR 60 Subpart IIII	§ 60.4200(a)	The engines are spark ignition engines rather than compression ignition engines.

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 10/17/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC		Area Name: Plains I Facility

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

Part 1

A. Compliance Plan — Future Activity Committal Statement	
The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.	
B. Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)	
1. With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	☒ YES ☐ NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☐ YES ☒ NO
3. If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	
* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122. Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.	

From: Loren Ladd <Loren.Ladd@bsigroup.com>
Sent: Friday, October 17, 2025 11:04 AM
To: Kyle Murray
Cc: Ryan Pickett; Alice Tabor; LINDSEY RENFRO; dkuntz@conduitpower.co; Gabby Wickersham
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Follow Up Flag: Follow up
Flag Status: Flagged

Happy Friday, Kyle,

Thank you for this follow-up! The requested documents have been submitted in STEERS.

While preparing the submission, I noticed that Darla's email address was still misrepresented (.com instead of .co), as was the company name (RPC Power instead of RPC Toll, LLC). Documents to address these items were submitted on July 7th and September 22nd, respectively. I just wanted to remind you/make you aware of these changes.

Thank you,
Loren Ladd
Consulting Technician, BSI Consulting

T: 512.657.2848
Loren.Ladd@bsigroup.com
bsigroup.com | [LinkedIn](#)
10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Thursday, October 16, 2025 8:23 AM
To: Loren Ladd <Loren.Ladd@bsigroup.com>
Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>; LINDSEY RENFRO <Lindsey.Renfro@bsigroup.com>; dkuntz@conduitpower.co
Subject: RE: Working Draft Permit -- FOP 04457/Project 38003, RPC Power LLC, Plains Texas Facility

Good morning Loren,

I wanted to check in on this request. I do not believe I have received the documents yet. Please provide a response by COB tomorrow, 10/17. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

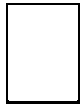
MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



Texas Commission on Environmental Quality

Title V Existing

4457

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PLAINS TEXAS FACILITY
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	from plains, tx, go sw on u.s. hwy 82 for approx. 3.3 mi. turn left s onto fm 1622. continue for approx. 5.15 mi to intx with fm 300. site is located approx 4,500 feet southwest of the intx between fm 1622 and fm 300.
City	Plains
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	33.074166
Longitude (W) (-###.#####)	102.891111
Primary SIC Code	0
Secondary SIC Code	
Primary NAICS Code	221112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111658415
What is the name of the Regulated Entity (RE)?	RPC POWER
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM PLAINS, TX, GO SW ON U.S. HWY 82 FOR APPROXIMATELY 3.3 MILES. TURN LEFT S ONTO FM 1622. CONTINUE FOR APPROXIMATELY 5.15 MILES AND TURN RIGHT W ONTO FM 280. SITE WILL BE LOCATED ON THE LEFT S.
City	PLAINS
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	
Longitude (W) (-###.#####)	
Facility NAICS Code	
What is the primary business of this entity?	POWER GENERATION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606104370
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Rpc Power LLC

Texas SOS Filing Number	804894731
Federal Tax ID	921157867
State Franchise Tax ID	
State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	RPC MERCHANT LLC
Prefix	MR
First	MATTHEW
Middle	
Last	BULPITT
Suffix	
Credentials	
Title	CHIEF OPERATING OFFICER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	820 GESSNER RD
Routing (such as Mail Code, Dept., or Attn:)	STE 895
City	HOUSTON
State	TX
ZIP	77024
Phone (###-###-####)	8179752084
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mbulpitt@conduitpower.co

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	DARLA KUNTZ(RPC TOLL LLC...)
Organization Name	RPC TOLL LLC
Prefix	MS
First	DARLA
Middle	
Last	KUNTZ
Suffix	
Credentials	
Title	HES MANAGER
Enter new address or copy one from list	

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

Zip

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

DARLA KUNTZ(RPC TOLL LLC...)

Organization Name

RPC TOLL LLC

Prefix

MS

First

DARLA

Middle

Last

KUNTZ

Suffix

Credentials

Title

HES MANAGER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

ZIP

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.com

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

33 Deg 4 Min 27 Sec

3) Permit Longitude Coordinate:

102 Deg 53 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.	4457-38003
5) Who will electronically sign this Title V application?	Duly Authorized Representative
6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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.

[File Properties]

File Name	1390976 RPC1 Sep 2025 Name Change Letter 092225.pdf
Hash	1F4C1BE39891B3BA9B0EE6375980D5B21506839A38DDA5BC9DDCC152AEB53850
MIME-Type	application/pdf

Certification

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

1. I am Darla K Kuntz, the owner of the STEERS account ER106444.
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 4457.
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: Darla K Kuntz OWNER OPERATOR

Account Number:	ER106444
Signature IP Address:	98.199.123.164
Signature Date:	2025-09-22
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	3971DDFB3CB02B989085484E3E008355A8402051F844497A378060D8FFD64EC8

Submission

Reference Number:	The application reference number is 818060
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-09-22 at 17:01:23 CDT
Submitted From:	The application was submitted from IP address 98.199.123.164
Confirmation Number:	The confirmation number is 679753
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 4457

Additional Information

Application Creator: This account was created by Zihui Qiu



September 22, 2025

TCEQ Region 2
5012 50th St, Ste 100
Lubbock, TX 79414-3426

**Re: RPC Toll, LLC – Plains Texas I Facility,
RN111658415
CN606318897
Title V Permit: O4457
Company Name Change Request**

Dear TCEQ:

Please find the complete Change of Name/Ownership Form to update the company name of the above-referenced site from RPC Power, LLC to RPC Toll, LLC.

Please reach out to Ryan Pickett at ryan.pickett@bsigroup.com or via phone at 512.202.9629 if you have any questions regarding this submittal.

Regards,

Alice Tabor

Alice Tabor
Associate Consultant

Reviewed by:

Ryan Pickett

Ryan Pickett
Senior Consultant, Manager

cc: US Environmental Protection Agency (EPA) Region 6
US EPA Region 6
1201 Elm Street, Suite 500
Dallas TX 75270
Darla Kuntz, HSE Manager

Attachments

Change of Name/Ownership Form
OP-CRO1 Form

Attachments

[Change of Name/Ownership Form](#)
[OP-CRO1 Form](#)

Change of Name/Ownership Form
Air Permits Division
Texas Commission on Environmental Quality

I. Application Type	
☐ Change in Ownership	☒ Change in Company Name
II. Name of the New Owner or Operator of the Facilities or Equipment (Legal Entity Name of the new permittee)	
A. Customer Name: RPC Toll, LLC	
B. Customer Reference Number (CN) (if issued): CN606318897	
C. Submittal Date: 09/22/2025	
D. Effective Date of Change: 05/06/2025	
E. Is the new owner an affiliate of the previous owner? ☒ YES ☐ NO	
III. Responsible Official (RO) Contact Information	
Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.):	
Full Name: Matthew Bulpitt	
Title: Chief Operating Officer	
Company Name: Conduit Power	
Mailing Address: 820 GESSNER RD	
City: HOUSTON	
State: TX	
Zip Code: 77024	
Telephone No.: 8179752084	
Fax No.:	
Email Address: mbulpitt@conduitpower.co	

Change of Name/Ownership Form
Air Permits Division
Texas Commission on Environmental Quality

IV. Technical Contact Information
Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.):
Full Name: Darla Kuntz
Title: HES Manager
Company Name: Conduit Power
Mailing Address: 820 GESSNER RD
City: Houston
State: TX
Zip Code: 77024
Telephone No.: 281-635-3409
Fax No.:
Email Address: dkuntz@conduitpower.co
V. Site Information
A. Site Name: Plains I Facility
B. Regulated Entity Number (RN) (<i>if issued</i>): RN111658415
C. Account Number (<i>if issued</i>): YA-A008-H
D. If action is transfer of ownership, is the change for the entire site ☒ YES ☐ NO ☐ N/A
E. If action is transfer of ownership for a portion of the existing site, will the new site be a major source? ☐ YES ☐ NO ☒ N/A
F. To the right of each pollutant below select "YES" for which the site is classified as a major source based on the site's potential to emit. Select "NO" for which the site is not a major source.
Pollutant: VOC ☐ YES ☒ NO
Pollutant: NO _x ☐ YES ☒ NO
Pollutant: SO ₂ ☐ YES ☒ NO
Pollutant: PM ₁₀ ☐ YES ☒ NO
Pollutant: CO ☒ YES ☐ NO
Pollutant: PB ☐ YES ☒ NO
Pollutant: HAPS ☐ YES ☒ NO
Other Pollutant:

**Change of Name/Ownership Form
Air Permits Division
Texas Commission on Environmental Quality**

VI. Air Authorizations That Are Affected By This Action
A. List all NSR authorizations (including PBR, SE, and standard permit registrations, and NSR permits), as applicable:
standard permit registrations 171720
B. List all FOPs (including SOPs and ATOs under GOPs), as applicable:
O4457
VII. NSR Conditions for Change of Ownership under 30 TAC § 116.110(e)
• The new owner agrees to be bound by all the permit conditions and all representations made in the permit and any amendments and alterations. • The new owner asserts there will be no change in the type of pollutants emitted. • The new owner asserts there will be no increase in the quantity emitted.

Change of Name/Ownership Form
Air Permits Division
Texas Commission on Environmental Quality

VIII. FOP Conditions for Change of Ownership

- For SOP holders:
Pursuant to 30 TAC § 122.210 and § 122.211, the permit holder (new owner) is required to submit a permit revision application for a change to the permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder. This written agreement is maintained with the permit.
- For GOP holders:
Pursuant to 30 TAC § 122.503, the permit holder (new owner) is required to submit (before the change is operated) an application for a new authorization to operate for a change to the permit identification of ownership or operational control of a site. The change must be facilitated by a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the old and new permit holder. This written agreement is maintained with the permit.

A. Are any other changes needed for the FOP? ☐ YES ☒ NO
(If YES, submit the information as explained in the instructions.)

B. Is there an Acid Rain permit or Cross-State Air Pollution Rule (CSAPR) requirements included in the SOP? ☐ YES ☒ NO
(If YES, submit the information as explained in the instructions.)

IX. Authorization

I, Darla Kuntz

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.

Signature: _____

Signature Date: 09/22/2025

Title: HSE Manager

Reset Form

Print Form

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

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information
RN: RN111658415
CN: CN606318897
Account No.: YA-A008-H
Permit No.: O4457
Project No.: 38003
Area Name: Plains Texas I Facility
Company Name: RPC Toll, LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☒ Other: <u>Change of Ownership</u>

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

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

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Darla Kuntz</u> certify that I am the <u>Duly Authorized Representative (DAR)</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From _____ to _____ <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: <u>9/22/2025</u> _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____
Title: <u>HSE Manager</u>

From: Kyle Murray

Sent: Wednesday, September 17, 2025 4:42 PM

To: 'Loren Ladd' <Loren.Ladd@bsigroup.com>

Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>; LINDSEY RENFRO <Lindsey.Renfro@bsigroup.com>; dkuntz@conduitpower.co

Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good afternoon all,

In her final review, my Team Leader identified some additional discrepancies that need to be resolved before we can issue the Public Notice Authorization Package (PNAP). Please provide a response to the following by **Friday, October 3rd**. Thank you!

1. Compliance Plan (OP-ACPS): The compliance plan should contain enforceable

language. Activities/milestones should be written as directives or should state that the applicant “will” or “shall” do the listed action. The milestones should be dated so that there is a deadline for each item. These deadlines should be in the Month, Day, Year format. The first two milestones regarding scheduling and conducting the tests should include a deadline like this, so for example “Schedule initial performance testing by December 31, 2025.”, “Conduct initial performance testing by March 31, 2026.”, etc. These deadlines are not saying that the activity will occur on those exact dates, but that the applicant will complete the item on or before that time. Then, the exception to a specific date is if a milestone will directly relate to the completion of a previous milestone. The final milestone is “Submit a report for initial performance testing.” Since NSPS JJJJ requires that a performance test report be submitted within 60 days after completing the test, the applicant could revise that to “Submit a report for initial performance testing within 60 days of conducting the testing.” Please provide me with an updated compliance plan. In addition, each compliance plan should include a milestone for completion of the plan: ““Company A shall submit a confirmation letter to TCEQ once the corrective action plan is completed.”

2. Please update the Permit shield reason on the OP-REQ2 for GRP-EGU for NSPS IIII from “The proposed engines...” to just “The engines” since the compliance plans for conducting performance tests suggest that at least some of these engines are operational.

Please let me know if you have any questions. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

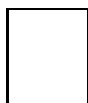
MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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

From: Loren Ladd <Loren.Ladd@bsigroup.com>
Sent: Wednesday, August 13, 2025 2:26 PM
To: Kyle Murray; dkuntz@conduitpower.co
Cc: Ryan Pickett; Alice Tabor; LINDSEY RENFRO
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Hi Kyle,

Thank you for including the emergency generator.
No comments for this WDP.

Best,

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

[bsigroup.com](https://www.bsigroup.com) | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Wednesday, August 13, 2025 9:49 AM
To: Loren Ladd <Loren.Ladd@bsigroup.com>; dkuntz@conduitpower.co
Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>; LINDSEY RENFRO <Lindsey.Renfro@bsigroup.com>
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good morning all,

I have incorporated the emergency generator and its requirements into the attached revised WDP. Please review the document and provide me with any comments you may have by **Wednesday, August 20th or sooner if possible**. If you have no comments, please indicate your approval so that we may move forward with the application process. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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

From: Loren Ladd <Loren.Ladd@bsigroup.com>

Sent: Friday, August 8, 2025 4:50 PM

To: Kyle Murray <Kyle.Murray@tceq.texas.gov>; dkuntz@conduitpower.co

Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>; LINDSEY RENFRO <Lindsey.Renfro@bsigroup.com>; R6AirPermitsTX <r6airpermitstx@epa.gov>

Subject: RE: Working Draft Permit -- FOP 04457/Project 38003, RPC Power LLC, Plains Texas Facility

Good afternoon, Kyle,

The forms you requested for the incorporation of an emergency generator into permit 04457 have been submitted in STEERS.

Please note that additional forms were included to reflect an administrative change at the facility. As indicated by our submission, Matthew Bulpitt is now the Responsible Official for the RPC Plains I Facility.

Have a great weekend!

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

bsigroup.com | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

Texas Commission on Environmental Quality

Title V Existing

4457

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PLAINS TEXAS FACILITY
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	from plains, tx, go sw on u.s. hwy 82 for approx. 3.3 mi. turn left s onto fm 1622. continue for approx. 5.15 mi to intx with fm 300. site is located approx 4,500 feet southwest of the intx between fm 1622 and fm 300.
City	Plains
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	33.074166
Longitude (W) (-###.#####)	102.891111
Primary SIC Code	0
Secondary SIC Code	
Primary NAICS Code	221112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111658415
What is the name of the Regulated Entity (RE)?	RPC POWER
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM PLAINS, TX, GO SW ON U.S. HWY 82 FOR APPROXIMATELY 3.3 MILES. TURN LEFT S ONTO FM 1622. CONTINUE FOR APPROXIMATELY 5.15 MILES AND TURN RIGHT W ONTO FM 280. SITE WILL BE LOCATED ON THE LEFT S.
City	PLAINS
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	
Longitude (W) (-###.#####)	
Facility NAICS Code	
What is the primary business of this entity?	POWER GENERATION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606104370
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Rpc Power LLC

Texas SOS Filing Number	804894731
Federal Tax ID	921157867
State Franchise Tax ID	
State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	RPC Toll LLC
Prefix	MR
First	Mathew
Middle	
Last	Bulpitt
Suffix	
Credentials	
Title	Chief Operating Officer
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	820 GESSNER RD STE 895
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77024
Phone (###-###-####)	8179752084
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mbulpitt@conduitpower.co

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	New Contact
Organization Name	RPC Toll LLC
Prefix	MS
First	Darla
Middle	
Last	Kuntz
Suffix	
Credentials	
Title	HSE Manager
Enter new address or copy one from list	Responsible Official Contact Address

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

Zip

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.co

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

RPC Toll LLC

Prefix

MS

First

Darla

Middle

Last

Kuntz

Suffix

Credentials

Title

HSE Manager

Enter new address or copy one from list:

Duly Authorized Representative Contact Address

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

ZIP

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.co

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

33 Deg 4 Min 27 Sec

3) Permit Longitude Coordinate:

102 Deg 53 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.

4457-38003

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

[File Properties]

File Name

OP-2 - RPC Emergency Generator Addition.pdf

Hash

B975DA4CD3021CAF2F992523EA92907163CA2BCBC33C23FBE1DD23A098AFB81A

MIME-Type

application/pdf

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

[File Properties]

File Name

OP-REQ1 RPC1 - Emergency Generator Addition (1).pdf

Hash

480090B8633B199FAA9E2BFA8CBB435203D109A7EA4CBB104331DDFA7900C9FC

MIME-Type

application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

[File Properties]

File Name

OP-PBRSUP RPC1 - Emergency Generator Addition.pdf

Hash

3BC8E67C8B9929B1D01453EECC93F060B7B45C09E992F91E7A07CF762B6CAD22

MIME-Type

application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name

OP-SUMR RPC1 - Emergency Generator Addition.pdf

Hash

DFDAFBBD28D0187A514E9E3C0F090CC94EA055A13694C456B4B6171B7CC659BB7

MIME-Type

application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name	OP-UA2 RPC1 - Emergency Generator Addition.pdf
Hash	EFADF31932DF5D8367458D13C6F636A81AE2780A32F9C28F7647EAEF0AA7CFCB
MIME-Type	application/pdf

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

Attach OP-CRO2 (Change of Responsible Official Information)

[File Properties]

File Name	OP-CRO2 - RPC1 RO Change.pdf
Hash	B24D72B941361AC3FD3F79557BAEE9953AC84A99615A4A32ABA7146971DE5175
MIME-Type	application/pdf

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	OP-CRO1 - RPC1 080825.pdf
Hash	57E524AC7A428271942A9AEF6FB49C636B08D8098E8DC49C4D11CD4BE4A4023E
MIME-Type	application/pdf

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

Certification

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

1. I am Darla K Kuntz, the owner of the STEERS account ER106444.
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 4457.
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: Darla K Kuntz OWNER OPERATOR

Account Number:

ER106444

Signature IP Address:	98.199.123.164
Signature Date:	2025-08-08
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	3A970809D2D2C63FD08E00269F30FD5914BCF1D642191CC6ED9CD22C910460EB

Submission

Reference Number:	The application reference number is 804143
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-08-08 at 16:37:46 CDT
Submitted From:	The application was submitted from IP address 98.199.123.164
Confirmation Number:	The confirmation number is 670301
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 4457

Additional Information

Application Creator: This account was created by Loren Ladd

**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.
08/08/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
EGU1	63ZZZZ	Area	500+	06+			
EGU2	63ZZZZ	Area	500+	06+			
EGU3	63ZZZZ	Area	500+	06+			
EGU4	63ZZZZ	Area	500+	06+			
EGU5	63ZZZZ	Area	500+	06+			
EGU6	63ZZZZ	Area	500+	06+			

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 8)
Federal Operating Permit Program
Table 4a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
8/08/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	Construction/ Reconstruction/ Modification Date	Test Cell	Exemption	Temp Replacement	Horsepower	Fuel	AEL No.	Lean Burn	Commencing
EGU1	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU2	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU3	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU4	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU5	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU6	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON

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

Date	Permit No.	Regulated Entity No.
8/08/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	Manufacture Date	Displacement	Certified	Operation	Certified Modification	Service	Severe Duty	Optional Compliance
EGU1	60JJJJ	N0710+		NO			NON		
EGU2	60JJJJ	N0710+		NO			NON		
EGU3	60JJJJ	N0710+		NO			NON		
EGU4	60JJJJ	N0710+		NO			NON		
EGU5	60JJJJ	N0710+		NO			NON		
EGU6	60JJJJ	N0710+		NO			NON		

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 10)
Federal Operating Permit Program
Table 5a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
8/08/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	Applicability Date	Exemptions	Service	Commencing	Manufacture Date
ENG1	60IIII	2005+	NONE	EMERG	CON	0406+

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 11)
Federal Operating Permit Program
Table 5b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart III: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
8/08/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	Diesel	AES No.	Displacement	Generator Set	Model Year	Install Date
ENG1	60III	DIESEL		10-CS		2017+	

Stationary Reciprocating Internal Combustion Engine Attributes
Form OP-UA2 (Page 12)
Federal Operating Permit Program
Table 5c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
8/08/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	Kilowatts	Filter	AECD	Standard	Compliance Option	PM Compliance	Options
ENG1	60III	E560-2237		YES	YES	MANU YES		

**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.
8/08/2025	O4457	RN111658415

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	7	ENG1	OP-UA2	Diesel-fired Emergency Generator		106.511/09/04/2000	

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

Date:	8/08/2025
Permit No.:	O4457
RN No.:	RN111658415

For SOP applications, answer ALL questions unless otherwise directed.

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

Form OP-REQ1: Page 88	
XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
◆ I. Permits by Rule (30 TAC Chapter 106) for the Application Area	
<i>A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.</i>	
PBR No.: 106.511	Version No./Date: 9/04/2000
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
◆ J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

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

Date	Permit Number	Regulated Entity Number
08/08/2025	O4457	RN111658415

Unit ID No.	Registration No.	PBR No.	Registration Date
N/A			

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

Date	Permit Number	Regulated Entity Number
08/08/2025	O4457	RN111658415

Unit ID No.	PBR No.	Version No./Date
ENG1	106.511	09/04/2000

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

Date	Permit Number	Regulated Entity Number
08/08/2025	O4457	RN111658415

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
08/08/2025	O4457	RN111658415

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
ENG1	106.511	09/04/2000	Maintain records of hours of operation, equipment maintenance log, vendor documentation of sulfur content in fuel, and fuel SDS.

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to TCEQ.

I. Identifying Information
Account No.: YA-A008-H
Regulated Entity Number: RN111658415
Customer Reference Number: CN606318897
Permit Number: O4457
Area Name: Plains I Facility
Company: RPC Toll, LLC
II. Change Type
Action Type: ☒ New Appointment ☐ Administrative Information Change
Contact Type (only one response accepted per form): ☒ Responsible Official ☐ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

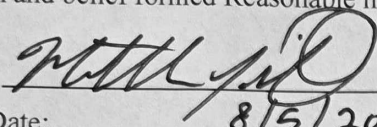
III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title: ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.
Name (Driver's License/STEERS): Matthew Bulpitt
Title: Chief Operating Officer
Appointment Effective Date: 08/05/2025
Telephone Number: 817-975-2084
Fax Number.:
Company Name: RPC Toll, LLC
Mailing Address: 820 Gessner Road Ste 895
City: Houston
State: Texas
ZIP Code: 77024
Email Address: mbulpitt@conduitpower.co

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

IV. Certification of Truth, Accuracy, and Completeness

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

I, Matthew Bulpitt, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: 

Signature Date: 8/5/2025

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

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information
RN: RN111658415
CN: CN606318897
Account No.: YA-A008-H
Permit No.: O4457
Project No.: 38003
Area Name: Plains I Facility
Company Name: RPC Toll, LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☒ Update to Permit Application
☐ Other: _____

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

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

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, Darla Kuntz_____ certify that I am the _____ DAR <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From 08/05/2025_____ to 08/08/2025_____ <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____
Title: HSE Manager

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

Date: 8/08/2025	
Permit No.: O4457	
Regulated Entity No.: RN111658415	
Company Name: RPC Toll, LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☒ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☐ NO	

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

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

Indicate all pollutants for which the site is a major source based on the site's potential to emit:

(Check the appropriate box[es].)

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

Other:

IV. Reference Only Requirements (For reference only)

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

V. Delinquent Fees and Penalties

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

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

Date: 8/08/2025
Permit No.: O4457
Regulated Entity No.: RN111658415
Company Name: RPC Toll, LLC

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

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	SIG-A	NO	EGU1	OP-UA2	171720	The Unit is applicable to the maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. 40 CFR 60.4243(b)(2)(ii)
2	SIG-A	NO	EGU2	OP-UA2	171720	The Unit is applicable to the maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. 40 CFR 60.4243(b)(2)(ii)
3	SIG-A	NO	EGU3	OP-UA2	171720	The Unit is applicable to the maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. 40 CFR 60.4243(b)(2)(ii)
4	SIG-A	NO	EGU4	OP-UA2	171720	The Unit is applicable to the maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. 40 CFR 60.4243(b)(2)(ii)

5	SIG-A	YES	EGU5	OP-SUM, OP-UA2	171720	The Unit is being added to the site.
6	SIG-A	YES	EGU6	OP-SUM, OP-UA2	171720	The Unit is being added to the site.
7	MS-C	YES	ENG1	OP-UA2	30 TAC §106.511	RPC Toll, LLC is installing a diesel-fired emergency generator. The combustion of fuel will emit products of combustion (NO_x, CO, VOC, PM/PM₁₀/PM_{2.5}, SO₂). The generator will be subject to 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Engines (CI RICE NSPS).

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

Date: 08/08/2025	
Permit No.: O4457	
Regulated Entity No.: RN111658415	
Company Name: RPC Toll, LLC	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? ☒ YES ☐ NO
B.	Indicate the alternate language(s) in which public notice is required: Spanish
C.	Will, there be a change in air pollutant emissions as a result of the significant revision? ☐ YES ☒ NO

**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
N/A	No air pollutant(s) will be changing.

From: Loren Ladd <Loren.Ladd@bsigroup.com>
Sent: Wednesday, July 30, 2025 1:08 PM
To: Kyle Murray; dkuntz@conduitpower.co
Cc: Ryan Pickett; Alice Tabor; LINDSEY RENFRO
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good afternoon, Kyle,

I appreciate your explanation and instructions!

The requested items will be uploaded to STEERS by Wednesday, August 13th and I'll notify you once this is complete.

Best,

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

bsigroup.com | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>

Sent: Wednesday, July 30, 2025 9:44 AM

To: Loren Ladd <Loren.Ladd@bsigroup.com>; dkuntz@conduitpower.co

Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>; LINDSEY RENFRO <Lindsey.Renfro@bsigroup.com>

Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good morning Loren,

We will be incorporating this change into this permit as mentioned by Mr. Meyer. Since this application is still in the review stage, we do not need the Form OP-Notify which is only used when regulatory requirement changes, not currently covered by the existing permit, are enacted. However, we will need some additional forms submitted to us so that we can

incorporate this new emergency generator. Please provide the following forms by

Wednesday, August 13th or sooner if possible.

1. **Form OP-UA2 – Table 5a~5c** – Please fill out the necessary information on these tables according to the [Form Instructions](#) and the attribute information for the generator.
2. **Form OP-PBR SUP** – Since this unit will be authorized under the non-registered PBR 106.511, it will need to be listed on Table B and D of the OP-PBR SUP. As a note, please submit all four tables as a set with each table dated.
3. **Form OP-REQ1 – Page 89** – The PBR authorizing this unit will also need to be listed in Section XII.I of the OP-REQ1.
4. **Form OP-SUMR – Table 1** – The new Unit ID and its associated information will also need to be included on this form.
5. **Form OP-2 – Table 2** – This form will need to be updated to document the addition of the new unit.

Please do not hesitate to reach out if you have any questions. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

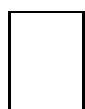
MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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

From: Loren Ladd <Loren.Ladd@bsigroup.com>
Sent: Tuesday, July 29, 2025 9:12 AM
To: Kyle Murray <Kyle.Murray@tceq.texas.gov>; dkuntz@conduitpower.co
Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>;
R6AirPermitsTX <r6airpermitstx@epa.gov>; LINDSEY RENFRO <Lindsey.Renfro@bsigroup.com>
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good morning, Kyle,

RPC Toll, LLC, is installing a diesel-fueled emergency generator at the Plains I Facility. The combustion of fuel will emit products of combustion (NOx, CO, VOC, PM/PM10/PM2.5, and SO2).

The generator will be subject to 40 CFR 60, Subpart IIII -- Standard of Performance for Stationary Compression Ignition Engines (CI RICE NSPS) and authorized under the non-registered Permi-by-Rule (PBR) 106.511 -- Portable and Emergency Engines and Turbines.

The attached document contains a cover letter and the TCEQ Op-Notify form, which I will mail to TCEQ Region 2 headquarters. These items were initially submitted via STEERS, but Mr. Mark Meyer of the TCEQ Air Permit Division informed us that this update can be incorporated into the existing permit revision application project under your review.

Please let us know if you have questions or need additional information.

Best,

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

bsigroup.com | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

Texas Commission on Environmental Quality

Title V Existing

4457

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PLAINS TEXAS FACILITY
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	from plains, tx, go sw on u.s. hwy 82 for approx. 3.3 mi. turn left s onto fm 1622. continue for approx. 5.15 mi to intx with fm 300. site is located approx 4,500 feet southwest of the intx between fm 1622 and fm 300.
City	Plains
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	33.074166
Longitude (W) (-###.#####)	102.891111
Primary SIC Code	0
Secondary SIC Code	
Primary NAICS Code	221112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111658415
What is the name of the Regulated Entity (RE)?	RPC POWER
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM PLAINS, TX, GO SW ON U.S. HWY 82 FOR APPROXIMATELY 3.3 MILES. TURN LEFT S ONTO FM 1622. CONTINUE FOR APPROXIMATELY 5.15 MILES AND TURN RIGHT W ONTO FM 280. SITE WILL BE LOCATED ON THE LEFT S.
City	PLAINS
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	
Longitude (W) (-###.#####)	
Facility NAICS Code	
What is the primary business of this entity?	POWER GENERATION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606104370
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Rpc Power LLC

Texas SOS Filing Number	804894731
Federal Tax ID	921157867
State Franchise Tax ID	
State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	RPC Toll LLC
Prefix	MR
First	Mathew
Middle	
Last	Whitaker
Suffix	
Credentials	
Title	Vice President
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	820 GESSNER RD STE 895
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77024
Phone (###-###-####)	7138237222
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mwhitaker@conduitpower.co

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	New Contact
Organization Name	RPC Toll LLC
Prefix	MS
First	Darla
Middle	
Last	Kuntz
Suffix	
Credentials	
Title	HSE MANAGER
Enter new address or copy one from list	

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

Zip

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.co

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

RPC Toll LLC

Prefix

MS

First

Darla

Middle

Last

Kuntz

Suffix

Credentials

Title

HSE Manager

Enter new address or copy one from list:

Duly Authorized Representative Contact Address

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

ZIP

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.co

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

33 Deg 4 Min 27 Sec

3) Permit Longitude Coordinate:

102 Deg 53 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.

4457-38003

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

Attach OP-ACPS (Application Compliance Plan and Schedule)

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

[File Properties]

File Name

[OP_CRO2_Plains 1 D. Kuntz - OP-CRO2 - signed 07.22.2025.pdf](/ePermitsExternal/faces/file?fileId=270684)

Hash

C1EF58652AC90D32FC8FE9CCAFB8B657EFC324B74F144C7F02797812348C04C6

MIME-Type

application/pdf

[File Properties]

File Name

[OP_CRO2_RPC1 M. Whitaker - OP-CRO2 - signed.pdf](/ePermitsExternal/faces/file?fileId=270685)

Hash

DD2EA4E2DE2669935262AF7C7D13D360D018DDC9E6014EAC4A0431BDB16EEB72

MIME-Type

application/pdf

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Plains I OP-CRO1 - OP-NOTIFY.pdf
Hash	3FEDDE27493063A873796F41A727A0EF319971954824C1ECF5353E08B16CDCF3
MIME-Type	application/pdf

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

[File Properties]

File Name	1390976 RPC Plains I Emergency Generator Addition 072225.pdf
Hash	AF6A97E1F920B93EBF27B1389584C58055DDC75A68348764D6A5387653672088
MIME-Type	application/pdf

Certification

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

1. I am Darla K Kuntz, the owner of the STEERS account ER106444.
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 4457.
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: Darla K Kuntz OWNER OPERATOR

Account Number:	ER106444
Signature IP Address:	99.26.233.1
Signature Date:	2025-07-22
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	625E263960E3BBFF31E6532D41F0AA15CBF056B1D0DF8369CA18998B66C372E4

Submission

Reference Number:	The application reference number is 799968
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-07-22 at 13:46:28 CDT
Submitted From:	The application was submitted from IP address 99.26.233.1
Confirmation Number:	The confirmation number is 666185
Steers Version:	The STEERS version is 6.92

Permit Number:

The permit number is 4457

Additional Information

Application Creator: This account was created by Loren Ladd



July 22, 2025

Jason Lindeman
Air/Water/Waste Section Manager
TCEQ Region 2
5012 50th St Ste 100
Lubbock TX 79414-3426

Re: FOP Notification of Off-Permit Action

RPC Toll, LLC – Plains I Facility
CN606318897
RN111658415
Title V Permit: O4457

Dear Jason Lindeman:

Please find attached the OP-NOTIFY form (Texas Commission on Environmental Quality [TCEQ] Form 10523) indicating the addition of a diesel-fueled emergency generator at the RPC Toll, LLC (RPC) Plains I Facility. The generator is authorized under the non-registered Permit-by-Rule (PBR) 106.511 – Portable and Emergency Engines and Turbines.

If you have questions regarding this submittal, please contact Ryan Pickett at ryan.pickett@bsigroup.com or via phone at 512.202.9629.

Regards,

Loren Ladd

Loren Ladd
Consulting Technician

Reviewed by:

Ryan Pickett

Ryan Pickett
Senior Consultant

cc: US Environmental Protection Agency (EPA) Region 6
US EPA Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270
Darla Kuntz, HSE Manager

Attachments

Attachment 1: OP-NOTIFY Form (TCEQ Form 10523)

Attachment 1

OP-NOTIFY Form (TCEQ Form 10523)

**Federal Operating Permit Program
Notification of Off-Permit/Operational Flexibility Action
Form OP-NOTIFY
Texas Commission on Environmental Quality**

Submittal Date:	7/22/2025
Company Name:	RPC Toll, LLC
Site Name:	Plains I Facility
Permit No.:	O4457
RO Email:	mwhitaker@conduitpower.co
DAR Email (if notification certified by DAR):	dkuntz@conduitpower.co

Notification Type	Date of Change	Emission Units Affected	Authorization Type	Authorization Number	Description of Change (Include deletions/additions in amount of emissions, types of pollutants emitted, and/or applicable requirements.)
OFFPMT	7/22/2025	ENG1	PBRNR	30 TAC §106.511	RPC Toll, LLC (RPC) is installing a diesel-fueled emergency generator at the Plains I Facility. The combustion of fuel will emit products of combustion (NO_x, CO, VOC, PM/PM₁₀/PM_{2.5}, SO₂). The generator will be subject to 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Engines (CI RICE NSPS).

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

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I. Identifying Information
RN: RN111658415
CN: CN606318897
Account No.: YA-A008-H
Permit No.: O4457
Project No.:
Area Name: Plains Texas I Facility
Company Name: RPC Toll, LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☒ Other: OP-NOTIFY

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

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IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, _____ Darla Kuntz _____ certify that I am the _____ DAR _____ (Certifier Name printed or typed)(RO or DAR)
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From _____ to _____ (Start Date)(End Date)
Specific Dates: 7/22/25 _____ (Date 1)(Date 2)(Date 3)(Date 4)
_____ (Date 5)(Date 6)
Signature: _____ Signature Date: _____
Title: HSE Manager

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to TCEQ.

I. Identifying Information
Account No.: YA-A008-H
Regulated Entity Number: RN111658415
Customer Reference Number: CN606318897
Permit Number: O4457
Area Name: Plains I Facility
Company: RPC Toll, LLC
II. Change Type
Action Type: ☐ New Appointment ☒ Administrative Information Change
Contact Type (only one response accepted per form): ☒ Responsible Official ☐ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

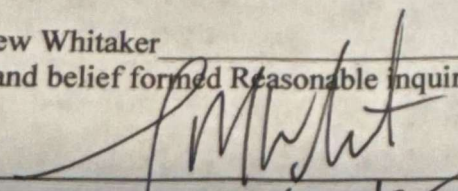
III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title: ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.
Name (Driver's License/STEERS): Mathew Whitaker
Title: Vice President
Appointment Effective Date:
Telephone Number: 713.823.7222
Fax Number.:
Company Name: RPC Toll, LLC
Mailing Address: 820 Gessner Rd Ste 895
City: Houston
State: TX
ZIP Code: 77024
Email Address: mwhitaker@conduitpower.co

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

IV. Certification of Truth, Accuracy, and Completeness

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

I, Mathew Whitaker, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: 

Signature Date: 7/22/25

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to TCEQ.

I. Identifying Information
Account No.: YA-A008-H
Regulated Entity Number: RN111658415
Customer Reference Number: CN606318897
Permit Number: O4457
Area Name: Plains I Facility
Company: RPC Toll, LLC
II. Change Type
Action Type: ☐ New Appointment ☒ Administrative Information Change
Contact Type (only one response accepted per form): ☐ Responsible Official ☒ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title:
☐ Mr.
☐ Mrs.
☒ Ms.
☐ Dr.
Name (Driver's License/STEERS): Darla Kuntz
Title: HSE Manager
Appointment Effective Date:
Telephone Number: 281-635-3409
Fax Number.:
Company Name: RPC Toll, LLC
Mailing Address: 820 Gessner Rd Suite 895
City: Houston
State: TX
ZIP Code: 77024
Email Address: dkuntz@conduitpower.co

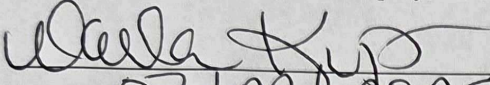
Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

IV. Certification of Truth, Accuracy, and Completeness

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

I, Darla Kuntz, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature:



Signature Date:

07/22/2025

From: Loren Ladd <Loren.Ladd@bsigroup.com>
Sent: Monday, July 14, 2025 10:27 AM
To: Kyle Murray; dkuntz@conduitpower.co
Cc: Ryan Pickett; Alice Tabor
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Hi Kyle,

Thank you for this confirmation!

Unfortunately, I still see Darla's email represented incorrectly in STEERS – maybe it takes a day or two for the system to accept the change? If it doesn't change in the next day or so, I will reach out to the STEERS helpdesk unless you have another course of action you'd recommend.

First DARLA
Middle
Last KUNTZ
Suffix
Credentials
Title HES MANAGER
Enter new address or copy one from list
Mailing Address
Address Type Domestic
Mailing Address (include Suite or Bldg. here, if applicable) 820 GE
Routing (such as Mail Code, Dept., or Attn:)
City HOUSTON
State TX
Zip 77024
Phone (###.###.####) 281-635-3409
Extension
Alternate Phone (###.###.####)
Fax (###.###.####)
E-mail dkuntz@conduitpower.com

Best,
Loren Ladd
Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

bsigroup.com | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Monday, July 14, 2025 9:03 AM
To: Loren Ladd <Loren.Ladd@bsigroup.com>; dkuntz@conduitpower.co
Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good morning Loren,

I have received both responses for Project 38003 and 38029. The update for Darla's email was made last Friday and should now be reflected in STEERS, but please let me know if this is not the case. Thank you!

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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

From: Loren Ladd <Loren.Ladd@bsigroup.com>

Sent: Friday, July 11, 2025 3:00 PM

To: Kyle Murray <Kyle.Murray@tceq.texas.gov>; dkuntz@conduitpower.co

Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>

Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Happy Friday, Kyle!

With Monday, July 14th nearing, I just wanted to confirm your receipt of the requested items. I was additionally curious as to the timeline of Darla's email update in STEERS. When can we expect this change to be made?

Thank you,

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

bsigroup.com | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

From: Loren Ladd <Loren.Ladd@bsigroup.com>
Sent: Monday, July 7, 2025 4:02 PM
To: Kyle Murray; dkuntz@conduitpower.co
Cc: Ryan Pickett; Alice Tabor
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility
Attachments: OP-CRO2 Plains Texas.pdf; OP-DEL Plains Texas.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon, Kyle,

I am confirming review of the WDP for Plains I Texas Facility. We do not have comments. As requested, OP-REQ2 has been updated and submitted through STEERS.

In addition, per our phone call discussion last week, the email address for Ms. Kuntz is incorrect in the "Duly Authorized Representative Contact" section of the STEERS application portal. We would like to update the email address to be dkuntz@conduitpower.co. Please see the attached documents authorizing this change. The same documents were submitted in STEERS along with the updated OP-REQ2.

Please let me know if you need anything else!

Best,

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

bsigroup.com | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

Texas Commission on Environmental Quality

Title V Existing

4457

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PLAINS TEXAS FACILITY
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	from plains, tx, go sw on u.s. hwy 82 for approx. 3.3 mi. turn left s onto fm 1622. continue for approx. 5.15 mi to intx with fm 300. site is located approx 4,500 feet southwest of the intx between fm 1622 and fm 300.
City	Plains
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	33.074166
Longitude (W) (-###.#####)	102.891111
Primary SIC Code	0
Secondary SIC Code	
Primary NAICS Code	221112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111658415
What is the name of the Regulated Entity (RE)?	RPC POWER
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM PLAINS, TX, GO SW ON U.S. HWY 82 FOR APPROXIMATELY 3.3 MILES. TURN LEFT S ONTO FM 1622. CONTINUE FOR APPROXIMATELY 5.15 MILES AND TURN RIGHT W ONTO FM 280. SITE WILL BE LOCATED ON THE LEFT S.
City	PLAINS
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	
Longitude (W) (-###.#####)	
Facility NAICS Code	
What is the primary business of this entity?	POWER GENERATION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606104370
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Rpc Power LLC

Texas SOS Filing Number	804894731
Federal Tax ID	921157867
State Franchise Tax ID	
State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	21-100
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name	CASTLEMAN POWER SYSTEMS
Prefix	MR
First	MATT
Middle	
Last	WHITAKER
Suffix	
Credentials	
Title	CHIEF OPERATING OFFICER
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	820 GESSNER RD STE 895
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
ZIP	77024
Phone (###-###-####)	7138237222
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	mwhitaker@conduitpower.co

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.	DARLA KUNTZ(RPC TOLL LLC...)
Organization Name	RPC TOLL LLC
Prefix	MS
First	DARLA
Middle	
Last	KUNTZ
Suffix	
Credentials	
Title	HES MANAGER
Enter new address or copy one from list	

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

Zip

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.com

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

New Contact

Organization Name

RPC Toll LLC

Prefix

MS

First

Darla

Middle

Last

Kuntz

Suffix

Credentials

Title

HSE Manager

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

ZIP

77024

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

2816353409

Extension

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

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

E-mail

dkuntz@conduitpower.co

Title V General Information - Existing

1) Permit Type:

SOP

2) Permit Latitude Coordinate:

33 Deg 4 Min 27 Sec

3) Permit Longitude Coordinate:

102 Deg 53 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.

4457-38003

5) Who will electronically sign this Title V application?

Duly Authorized Representative

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

No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

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)

[File Properties]

File Name

OP-REQ2..pdf

Hash

AC61F94A1442587BD29DBB6FEF624F4ED8859E1D13395AA4C8B6D5D4D4750741

MIME-Type

application/pdf

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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

Attach OP-CRO2 (Change of Responsible Official Information)

[File Properties]

File Name

OP-CRO2 - Plains Texas - signed.pdf

Hash

2EE7504650EB8892B01803AE51007271006F3D5980B4D8CE3529C5BCDF4B2824

MIME-Type

application/pdf

Attach OP-DEL (Delegation of Responsible Official)

[File Properties]

File Name

OP-DEL - Plains Texas - signed.pdf

Hash

E9C63AA5B1A5B1938DF4835AB2D9843F7553AACC2A91A417FF8DA078AAB80761

MIME-Type

application/pdf

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	OP-CRO1..pdf
Hash	1D9D26953D1A7432BF96DE0E5EC29FC108944DC62797719833B0198D83726EBD
MIME-Type	application/pdf

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

Certification

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

1. I am Darla K Kuntz, the owner of the STEERS account ER106444.
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 4457.
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: Darla K Kuntz OWNER OPERATOR

Account Number:	ER106444
Signature IP Address:	98.199.123.164
Signature Date:	2025-07-07
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	28BE5DFFDF00D70C032858D0311734F4D26F92C915BE55DAE6F69A2F26D3D19B

Submission

Reference Number:	The application reference number is 797880
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-07-07 at 15:55:02 CDT
Submitted From:	The application was submitted from IP address 98.199.123.164
Confirmation Number:	The confirmation number is 663139
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 4457

Additional Information

Application Creator: This account was created by Loren Ladd

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
07/02/2025	04457	RN111658415

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		GRP-EGU	REQ2	40 CFR 60 Subpart IIII	§ 60.4200(a)	The proposed engines are spark ignition engines rather than compression ignition engines.

Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
Texas Commission on Environmental Quality

I. Identifying Information
Account No.: YA-A008-H
RN: RN11658415
CN: CN606318897
Permit No.: O4457
Area Name: Plains Texas Facility
Company Name: RPC Toll, LLC
II. Duly Authorized Representative Information
Action Type: ☐ New DAR Identification ☒ Administrative Information Change
Conventional Title: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)
Name (on driver's license): Darla Kuntz
Title: HSE Manager
Delegation Effective Date:
Telephone No.: 281-635-3409
Fax No.:
Company Name: RPC Toll, LLC
Mailing Address: 820 Gessner Rd Suite 895
City: Houston
State: Texas
ZIP Code: 77024
Email Address: dkuntz@conduitpower.co

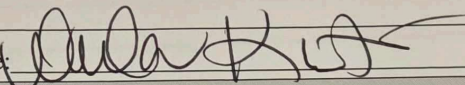
Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
Texas Commission on Environmental Quality

III. Certification of Truth, Accuracy, and Completeness

I, Darla Kuntz, certify that, based on

(Name printed or typed: RO for New DAR Identification; RO or DAR for Administrative Information Change)

information and belief formed after reasonable inquiry, the statements, and information stated above are true, accurate, and complete. *(RO signature required for New DAR Identification only; DAR signature required for any Action Type)*

Responsible Official Signature:  Date: 07/03/2025

Duly Authorized Representative Signature: _____

Date: _____

IV. Removal of Duly Authorized Representative(s)

The following should be removed as Duly Authorized Representative(s):

_____ Effective Date: _____

(Name(s) printed or typed)

Responsible Official Signature: _____ Date: _____

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

The Texas Commission on Environmental Quality (TCEQ) shall be notified of a new appointment or administrative information change (e.g., address, phone number, title) for a Responsible Official (RO), Designated Representative (DR), or Alternate Designated Representative (ADR) in the next submittal. This form satisfies the requirements for notification (a revised Certificate of Representation must also be submitted to the U.S. Environmental Protection agency for changes in the DR and ADR). After the initial submittal, if there is a change of Duly Authorized Representative (DAR) appointment or administrative information changes for the DAR, include a revised Form OP-DEL (Delegation of Responsible Official) with the next submittal to TCEQ.

I. Identifying Information
Account No.: YA-A008-H
Regulated Entity Number: RN11658415
Customer Reference Number: CN606318897
Permit Number: O4457
Area Name: Plains Texas Facility
Company: RPC Toll, LLC
II. Change Type
Action Type: ☐ New Appointment ☒ Administrative Information Change
Contact Type (only one response accepted per form): ☐ Responsible Official ☒ Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>) ☐ Alternate Designated Representative (<i>Acid Rain Program and/or CSAPR sources only</i>)

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

III. Responsible Official/Designated Representative/Alternate Designated Representative Information
Conventional Title:
☐ Mr.
☐ Mrs.
☒ Ms.
☐ Dr.
Name (Driver's License/STEERS): Darla Kuntz
Title: HSE Manager
Appointment Effective Date:
Telephone Number: 281-635-3409
Fax Number.:
Company Name: RPC Toll, LLC
Mailing Address: 820 Gessner Rd Suite 895
City: Houston
State: TX
ZIP Code: 77024
Email Address: dkuntz@conduitpower.co

Form OP-CRO2
Change of Responsible Official Information
Federal Operating Permit Program

IV. Certification of Truth, Accuracy, and Completeness

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

I, Darla Kuntz, certify that based on information and belief formed Reasonable inquiry, the statement and information stated above are true, accurate, and complete.

Signature: _____

Signature Date: _____

07/03/2025

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

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information
RN: RN111658415
CN: CN606318897
Account No.: YA-A008-H
Permit No.: O4457
Project No.: 38003
Area Name: Plains Texas I Facility
Company Name: RPC Toll, LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☐ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☒ Update to Permit Application
☐ Other: _____

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

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

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Darla Kuntz</u> certify that I am the <u>Duly Authorized Representative (DAR)</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From <u>3/24/2025</u> to <u>07/02/25</u> <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____
Title: <u>HSE Manager</u>

From: Loren Ladd
Sent: Thursday, June 19, 2025 4:53 PM
To: Kyle Murray <Kyle.Murray@tceq.texas.gov>; dkuntz@conduitpower.co
Cc: Ryan Pickett <Ryan.Pickett@bsigroup.com>; Alice Tabor <Alice.Tabor@bsigroup.com>
Subject: RE: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good afternoon, Kyle,

I am confirming receipt of this message.

Thank you for providing the WDP for the Plains Facility and giving a summary of updates. We will review the draft, complete the updates, and submit applicable documents prior to Monday July 14th.

Best,

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

bsigroup.com | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

From: Kyle Murray <Kyle.Murray@tceq.texas.gov>
Sent: Thursday, June 19, 2025 2:58 PM
To: dkuntz@conduitpower.co
Cc: Loren Ladd <Loren.Ladd@bsigroup.com>
Subject: Working Draft Permit -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good afternoon all,

I have conducted a technical review of the significant revision application for RPC Power LLC, Plains Texas Facility. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided. Please review the WDP and submit to me any comments you have on the working draft permit by **Monday, July 14th**. Please also see my note below.

1. **Permit Shield for MACT ZZZZ - § 63.6590(c)(1) – GRP-EGU** – The permit shield for engines subject to 63.6590(c) was incorrectly granted in the initial issuance of this permit and should not have been included. This is not an overlap provision like other Part 63 NESHAP standards. The regulation is very clear that the affected sources are meeting the requirements of 40 CFR Part 63, Subpart ZZZZ by complying with 40 CFR Part 60, Subpart IIII or JJJJ depending on whether the engine is a CI or SI engine. Therefore, I have removed the permit shield from the WDP. Please also remove this entry from the OP-REQ2 and provide me with an updated copy. Let me know if you have any questions about this and I would be happy to clarify.

Please review the second portion of the “SOP Technical Review Fact Sheet” located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

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

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

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at 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 let me know if you have any questions or comments and I would be happy to help. Thank you!

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

Sincerely,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



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

From: Loren Ladd <Loren.Ladd@bsigroup.com>
Sent: Thursday, April 24, 2025 11:14 AM
To: Kyle Murray
Cc: dkuntz@conduitpower.co; Ryan Pickett; Alice Tabor
Subject: Technical Review -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good morning, Kyle,

I am writing to confirm that the significant revision application for Permit No. O4457 for RPC Power LLC, Plains Texas Facility has been electronically submitted to EPA Region 6 (you were copied on the transmission) and mailed to TCEQ Region 2, in accordance with your email to Ms. Kuntz on April 23rd at 2:51 pm.

Thank you for your review and communication regarding this project.

Best,

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

bsigroup.com | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

From: Loren Ladd <Loren.Ladd@bsigroup.com>
Sent: Thursday, April 24, 2025 10:28 AM
To: R6AirPermitsTX@EPA.gov
Cc: Ryan Pickett; Alice Tabor; dkuntz@conduitpower.co; Kyle Murray
Subject: FOP O4457 RPC Power LLC, Plains Texas Facility - Significant Revision Application
Attachments: 1353966 RPC Toll Plains Texas I Title V Revision Application 042025.pdf

To all parties,

RPC Toll, LLC Plains Texas Facility has submitted an application for the significant revision of their Title V Permit No. O4457 (TCEQ Project No. 38003). A copy of the significant revision application is attached. Please contact me with comments, concerns, or questions regarding the attached.

Best,

Loren Ladd

Consulting Technician, BSI Consulting

T: 512.657.2848

Loren.Ladd@bsigroup.com

[bsigroup.com](https://www.bsigroup.com) | [LinkedIn](#)

10900 Stonelake Blvd, Bldg 2, Suite 100, Office 02-150, Austin TX 78759

From: Kyle Murray
Sent: Wednesday, April 23, 2025 2:51 PM
To: dkuntz@conduitpower.co
Subject: Technical Review -- FOP O4457/Project 38003, RPC Power LLC, Plains Texas Facility

Good afternoon Ms. Kuntz,

I have been assigned to the Federal Operating Permit (FOP) significant revision application of Permit No. O4457 for RPC Power LLC, Plains Texas Facility. This application has been assigned Project No. 38003. 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 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](#). 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,

Kyle J. Murray

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC 163, P.O. Box 13087

Austin, TX 78711-3087

kyle.murray@tceq.texas.gov

Phone: (512) 239-1279

Fax: (512) 239-1400



How are we doing? Fill out our online customer satisfaction survey

at www.tceq.texas.gov/customersurvey

Carolyn Thomas

From: eNotice TCEQ
Sent: Thursday, April 10, 2025 10:51 AM
To: kevin.sparks@senate.texas.gov; Dustin.burrows@house.texas.gov
Subject: TCEQ Notice - Permit Number O4457
Attachments: TCEQ Notice - O4457_38003.pdf

This email is being sent to electronically transmit an official document issued by the Office of Air of the Texas Commission on Environmental Quality.

This email is being sent to you because either (a) you filed a document with the Office of the Chief Clerk that made you part of the official mailing list for the above referenced matter, or (b) notice to you is legally required. As authorized by Texas Water Code 5.128, this electronic transmittal is replacing the previous practice of hard copy distribution. Amendments to Texas Government Code 552.137 prompted a change to the agency's privacy policy regarding confidentiality of certain email addresses. The revised privacy policy can be viewed at http://www.tceq.state.tx.us/help/policies/electronic_info_policy.html.

Questions regarding this email may be submitted either by replying directly to this email or by calling Mr. Jesse Chacon, P.E. with the Air Permits Division at (512) 239-5759.

The attached document is provided in an Adobe Acrobat .pdf format. If you cannot display the attachment, you may need to visit the Adobe web site (<http://get.adobe.com/reader>) to download the free Adobe Acrobat Reader software.

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 10, 2025

THE HONORABLE KEVIN SPARKS
TEXAS SENATE
PO BOX 12068
AUSTIN TX 78711-2068

Re: Accepted Federal Operating Permit Significant Revision Application
Project Number: 38003
Permit Number: O4457
Rpc Power LLC
Plains Texas Facility
Plains, Yoakum County
Regulated Entity Number: RN111658415
Customer Reference Number: CN606104370

Dear Senator Sparks:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) significant revision application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application. <https://gisweb.tceq.texas.gov/LocationMapper/?marker=-102.891111,33.074166&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site. The FOP identifies and codifies air emission requirements (known as applicable requirements) that apply to the emission units at the site. The FOP does not authorize construction of emission units or emissions from those units. The New Source Review (NSR) permit is the mechanism for these authorizations.

The Honorable Kevin Sparks
Page 2
April 10, 2025

Re: Accepted Federal Operating Permit Significant Revision Application

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel Short', followed by a long horizontal line extending to the right.

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

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



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 10, 2025

THE HONORABLE DUSTIN BURROWS
TEXAS HOUSE OF REPRESENTATIVES
PO BOX 2910
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Significant Revision Application
Project Number: 38003
Permit Number: O4457
Rpc Power LLC
Plains Texas Facility
Plains, Yoakum County
Regulated Entity Number: RN111658415
Customer Reference Number: CN606104370

Dear Representative Burrows:

This letter notifies you that the Texas Commission on Environmental Quality has received a federal operating permit (FOP) significant revision application for a site located in your district. As part of this permitting process, the applicant is required to publish a formal newspaper public notice. The notice will inform the public of their right to make comments or request a public hearing. This link to an electronic map of the site or facility's general location is provided as a public courtesy and not part of the application or notice. For exact location, refer to application.

<https://gisweb.tceq.texas.gov/LocationMapper/?marker=-102.891111,33.074166&level=13>.

The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment at the site.

This letter is being sent to you for information only and no action is required. If you need further information, please contact me at (512) 239-1250.

Sincerely,

A handwritten signature in black ink, appearing to read "Samuel Short", followed by a long horizontal line.

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

Texas Commission on Environmental Quality

Title V Existing

4457

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	PLAINS TEXAS FACILITY
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM PLAINS, TX, GO SW ON U.S. HWY 82 FOR APPROX. 3.3 MILES. TURN LEFT S ONTO FM 1622. CONTINUE FOR APPROX. 5.15 MILES TO INTERSECTION WITH FM 300. SITE IS LOCATED APPROXIMATELY 4,500 FEET SOUTHWEST OF THE INTERSECTION BETWEEN FM 1622 AND FM 300.
City	PLAINS
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	33.074166
Longitude (W) (-###.#####)	102.891111
Primary SIC Code	0
Secondary SIC Code	
Primary NAICS Code	221112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN111658415
What is the name of the Regulated Entity (RE)?	RPC POWER
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM PLAINS, TX, GO SW ON U.S. HWY 82 FOR APPROXIMATELY 3.3 MILES. TURN LEFT S ONTO FM 1622. CONTINUE FOR APPROXIMATELY 5.15 MILES AND TURN RIGHT W ONTO FM 280. SITE WILL BE LOCATED ON THE LEFT S.
City	PLAINS
State	TX
ZIP	79355
County	YOAKUM
Latitude (N) (##.#####)	
Longitude (W) (-###.#####)	
Facility NAICS Code	
What is the primary business of this entity?	POWER GENERATION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606104370
Type of Customer	Partnership

Full legal name of the applicant:

Legal Name

Rpc Power LLC

Texas SOS Filing Number

804894731

Federal Tax ID

921157867

State Franchise Tax ID

State Sales Tax ID

Local Tax ID

DUNS Number

Number of Employees

21-100

Independently Owned and Operated?

Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:

Organization Name

CASTLEMAN POWER SYSTEMS

Prefix

MR

First

MATT

Middle

Last

WHITAKER

Suffix

Credentials

Title

CHIEF OPERATING OFFICER

Enter new address or copy one from list:

Mailing Address

Address Type

Domestic

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

820 GESSNER RD STE 895

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

City

HOUSTON

State

TX

ZIP

77024

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

7138237222

Extension

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

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

E-mail

mwhitaker@conduitpower.co

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application

Select existing DAR contact or enter a new contact.

New Contact

Organization Name

RPC Toll LLC

Prefix

MS

First

Darla

Middle

Last

Kuntz

Suffix

Credentials

Title	HSE MANAGER
Enter new address or copy one from list	Responsible Official Contact Address
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	820 GESSNER RD STE 895
Routing (such as Mail Code, Dept., or Attn:)	
City	HOUSTON
State	TX
Zip	77024
Phone (###-###-####)	2816353409
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	dkuntz@conduitpower.co

Technical Contact

Person TCEQ should contact for questions about this application:

Select existing TC contact or enter a new contact.

Organization Name

Prefix

First

Middle

Last

Suffix

Credentials

Title

Enter new address or copy one from list:

Mailing Address

Address Type

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

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

City

State

ZIP

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

Extension

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

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

E-mail

New Contact

RPC Toll LLC

MS

Darla

Kuntz

HSE Manager

Domestic

820 GESSNER RD STE 895

HOUSTON

TX

77024

2816353409

dkuntz@conduitpower.co

Title V General Information - Existing

1) Permit Type:

2) Permit Latitude Coordinate:

3) Permit Longitude Coordinate:

SOP

33 Deg 4 Min 27 Sec

102 Deg 53 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?	Significant 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) Who will electronically sign this Title V application?	Duly Authorized Representative
6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

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.

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

[File Properties]

File Name	1353966 RPC Toll Plains Texas I Title V Revision Application 040425.pdf	
Hash	9D3F89006C414A1273E937683B45A30BEC7BB9220C83C12D6D23271C7180CF68	
MIME-Type	application/pdf	

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?

No

Certification

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

1. I am Darla K Kuntz, the owner of the STEERS account ER106444.
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 4457.
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: Darla K Kuntz OWNER OPERATOR

Account Number:	ER106444
Signature IP Address:	98.199.123.164
Signature Date:	2025-04-08
Signature Hash:	657B1E891BA8F70E49E498A7849CF8570E3F6CBC1962D0F62A3B946EC4FB675C
Form Hash Code at time of Signature:	3B3C0A064A94A660D4794C4B16C7DDB3EA550E73851273F7E1E8F8335AC9D734

Submission

Reference Number:	The application reference number is 770414
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-04-08 at 10:59:57 CDT
Submitted From:	The application was submitted from IP address 98.199.123.164
Confirmation Number:	The confirmation number is 644966
Steers Version:	The STEERS version is 6.89
Permit Number:	The permit number is 4457

Additional Information

Application Creator: This account was created by Zihui Qiu



April 4, 2025

Samuel Short
Director of Air Permits Division
Texas Commission on Environmental Quality
Air Permits Division, MC-163
12100 Park 35 Circle
Austin TX 78735

Re: RPC Toll, LLC – Plains Texas I Facility
Plains, Texas 79355
Title V Permit No. O4457
RN Number: RN111658415
CN Number: CN606318897

Title V Permit No. O4457 Revision Application – BSI Project No. 1353966

Dear Samuel Short:

Please find enclosed an OP-2 form and supporting documents to revise Title V Permit No. O4457 for the electric generating units (EGUs) located at the RPC Toll, LLC (RPC) Plains Texas I Facility (the Facility).

The manufacturer of the EGUs (Unit ID Nos. EGU1-EGU4) updated the emissions information labels for the units onsite, which changed the applicability to maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

The Title V Permit currently authorizes four EGUs (Unit ID Nos. EGU1–EGU4); however, RPC is requesting the authorization of two additional EGUs (Unit ID Nos. EGU5 and EGU6). The annual emissions associated with the EGUs will not increase as a result of this request. The annual emissions are being capped based on four engines operating continuously throughout the year, totaling 35,040 hours annually. The Facility is implementing operational limits in accordance with the site's electrical output capacity as it can only transmit a designated amount of power to the grid.

The two additional EGUs (Unit ID Nos. EGU5 and EGU6) will be installed in full compliance with applicable testing requirements. Given this, the OP-ACPS form included with this revision does not include Unit ID Nos. EGU5 and EGU6 as there were no noncompliance situations to report for these units.

Should there be any questions regarding the application, please contact Ryan Pickett at 512.202.9629 or at ryan.pickett@bsigroup.com.

Regards,

Loren Ladd

Loren Ladd
Consulting Technician

Reviewed by:

Ryan Pickett

Ryan Pickett
Senior Consultant, Manager

cc: Darla Kuntz, HSE Manager, RPC Toll, LLC
Matthew Whitaker, Vice President, RPC Toll, LLC
US Environmental Protection Agency (EPA) Region 6 Office

Attachments

OP-2
OP-CRO1
OP-DEL
OP-SUM
OP-UA2
OP-REQ1
OP-REQ2
OP-REQ3
OP-AR3
OP-ACPS
New Unit Exemption – Acid Rain

Attachments

OP-2

OP-CRO1

OP-DEL

OP-SUM

OP-UA2

OP-REQ1

OP-REQ2

OP-REC3

OP-AR3

OP-ACPS

New Unit Exemption – Acid Rain

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

Date: 3/24/2025	
Permit No.: O4457	
Regulated Entity No.: RN111658415	
Company Name: RPC Toll, LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? ☒ YES ☐ NO	
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☒ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only ☒ YES ☐ NO	
For GOP Revisions Only ☐ YES ☐ NO	

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

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

Indicate all pollutants for which the site is a major source based on the site's potential to emit:

(Check the appropriate box[es].)

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

Other:

IV. Reference Only Requirements (For reference only)

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

V. Delinquent Fees and Penalties

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

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

Date: 3/24/2025
Permit No.: O4457
Regulated Entity No.: RN111658415
Company Name: RPC Toll, LLC

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

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	SIG-A	NO	EGU1	OP-UA2	171720	The Unit is applicable to the maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. 40 CFR 60.4243(b)(2)(ii)
2	SIG-A	NO	EGU2	OP-UA2	171720	The Unit is applicable to the maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. 40 CFR 60.4243(b)(2)(ii)
3	SIG-A	NO	EGU3	OP-UA2	171720	The Unit is applicable to the maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. 40 CFR 60.4243(b)(2)(ii)
4	SIG-A	NO	EGU4	OP-UA2	171720	The Unit is applicable to the maintenance planning and performance testing requirements of New Source Performance Standards (NSPS) Part 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. 40 CFR 60.4243(b)(2)(ii)

5	SIG-A	NO	EGU5	OP-SUM, OP-UA2	171720	The Unit is being added to the site.
6	SIG-A	NO	EGU6	OP-SUM, OP-UA2	171720	The Unit is being added to the site.

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

Date: 3/24/2025	
Permit No.: O4457	
Regulated Entity No.: RN111658415	
Company Name: RPC Toll, LLC	
I. Significant Revision <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A.	Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322? ☒ YES ☐ NO
B.	Indicate the alternate language(s) in which public notice is required: Spanish
C.	Will, there be a change in air pollutant emissions as a result of the significant revision? ☐ YES ☒ NO

**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
N/A	No air pollutant(s) will be changing.

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

All initial issuance, revision, renewal, and reopening permit application submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information
RN: RN111658415
CN: CN606318897
Account No.:
Permit No.: O4457
Project No.: TBA
Area Name: Plains Texas I Facility
Company Name: RPC Toll, LLC
II. Certification Type <i>(Please mark appropriate box)</i>
☐ Responsible Official Representative ☒ Duly Authorized Representative
III. Submittal Type <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>
☐ SOP/TOP Initial Permit Application ☒ Permit Revision, Renewal, or Reopening
☐ GOP Initial Permit Application ☐ Update to Permit Application
☐ Other: _____

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

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

IV. Certification of Truth
This certification does not extend to information which is designated by TCEQ as information for reference only.
I, <u>Darla Kuntz</u> certify that I am the <u>Duly Authorized Representative (DAR)</u> <i>(Certifier Name printed or typed)</i><i>(RO or DAR)</i>
and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete: <i>Note: Enter Either a Time Period or Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i>
Time Period: From <u>3/24/2025</u> to _____ <i>(Start Date)</i><i>(End Date)</i>
Specific Dates: _____ <i>(Date 1)</i><i>(Date 2)</i><i>(Date 3)</i><i>(Date 4)</i>
_____ <i>(Date 5)</i><i>(Date 6)</i>
Signature: _____ Signature Date: _____ Title: _____
Title: _____

Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
Texas Commission on Environmental Quality

I. Identifying Information
Account Number:
Regulated Entity Number: RN111658415
Customer Reference Number: CN606318897
Permit Number: O4457
Area Name: Plains Texas I Facility
Company Name: RPC Toll, LLC
II. Duly Authorized Representative Information
Action Type: ☒ New DAR Identification ☐ Administrative Information Change
Conventional Title: ☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.
Name (Driver License/STEERS): Darla Kuntz
Title: HES Manager
Delegation Effective Date: 3/24/2025
Telephone Number: 281-635-3409
Fax Number:
Company Name: RPC Toll, LLC
Mailing Address: 820 Gessner Rd Ste 895
City: Houston
State: Texas
ZIP Code: 77024
Email Address: dkuntz@conduitpower.co

Form OP-DEL
Delegation of Responsible Official Information
Federal Operating Permit Program
Texas Commission on Environmental Quality

III. Certification of Truth, Accuracy, and Completeness

I, Matthew Whitaker

(Name printed or typed: RO for New DAR Identification; RO or DAR for Administrative Information Change)

Certify that, based on information and belief formed after reasonable inquiry, the statements, and information stated above are true, accurate, and complete. (RO signature required for New DAR Identification only; DAR signature required for any Action Type)

Responsible Official Signature:

Date:

Duly Authorized Representative Signature:

(Name(s) printed or typed)

Date:

IV. Removal of Duly Authorized Representative(s)

The following should be removed as Duly Authorized Representative(s):

(Name(s) printed or typed)

Effective Date:

Responsible Official Signature: _____

Date:

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

Table 1

Date	Permit No.	Regulated Entity No.
03/24/2025	O4457	RN111658415

Unit/Process ID No.	Applicable Form	Unit Name/Description	CAM	Preconstruction Authorizations 30 TAC Chapter 116/30 TAC Chapter 106	Preconstruction Authorizations Title I	Group ID No.
EGU1	OP-UA2	Electric Generating Unit 1		171720		GRP-EGU
EGU2	OP-UA2	Electric Generating Unit 2		171720		GRP-EGU
EGU3	OP-UA2	Electric Generating Unit 3		171720		GRP-EGU
EGU4	OP-UA2	Electric Generating Unit 4		171720		GRP-EGU
EGU5	OP-UA2	Electric Generating Unit 5		171720		GRP-EGU
EGU6	OP-UA2	Electric Generating Unit 6		171720		GRP-EGU

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.
03/24/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	HAP Source	Brake HP	Construction/ Reconstruction Date	Nonindustrial Emergency Engine	Service Type	Stationary RICE Type
EGU1	63ZZZZ	Area	500+	06+			
EGU2	63ZZZZ	Area	500+	06+			
EGU3	63ZZZZ	Area	500+	06+			
EGU4	63ZZZZ	Area	500+	06+			
EGU5	63ZZZZ	Area	500+	06+			
EGU6	63ZZZZ	Area	500+	06+			

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

Federal Operating Permit Program

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

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

Date	Permit No.	Regulated Entity No.
03/24/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	Construction/ Reconstruction/ Modification Date	Test Cell	Exemption	Temp Replacement	Horsepower	Fuel	AEL No.	Lean Burn	Commencing
EGU1	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU2	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU3	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU4	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU5	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON
EGU6	60JJJJ	YES	NO	NONE	NO	1350+	NATGAS			CON

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

Date	Permit No.	Regulated Entity No.
03/24/2025	O4457	RN111658415

Unit ID No.	SOP/GOP Index No.	Manufacture Date	Displacement	Certified	Operation	Certified Modification	Service	Severe Duty	Optional Compliance
EGU1	60JJJJ	N0710+		NO			NON		
EGU2	60JJJJ	N0710+		NO			NON		
EGU3	60JJJJ	N0710+		NO			NON		
EGU4	60JJJJ	N0710+		NO			NON		
EGU5	60JJJJ	N0710+		NO			NON		
EGU6	60JJJJ	N0710+		NO			NON		

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

Date	Permit No.	Regulated Entity No.
03/24/2025	O4457	RN111658415

For SOP applications, answer ALL questions unless otherwise directed.

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

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

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

Authorization No.	Issuance Date	Authorization No.	Issuance Date	Authorization No.	Issuance Date
171720	03/18/2025				

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

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

PBR No.	Version No./Date	PBR No.	Version No./Date	PBR No.	Version No./Date

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

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

Form OP-REQ2
Negative Applicable/Superseded Requirement Determinations
Texas Commission on Environmental Quality

Date	Permit No.	Regulated Entity No.
03/24/2025	04457	RN111658415

Unit AI	Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	Potentially Applicable Regulatory Name	Negative Applicability/Superseded Requirement Citation	Negative Applicability/Superseded Requirement Reason
		GRP-EGU	REQ2	40 CFR 60 Subpart IIII	§ 60.4200(a)	The proposed engines are spark ignition engines rather than compression ignition engines.
		GRP-EGU	OP-UA2	40 CFR 63 Subpart ZZZZ	§ 63.6590(c)(1)	The proposed engines will meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ.

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

Table 1a: Additions

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC	Area Name: Plains Texas I Facility	

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)
	GRP-EGU	OP-UA2	60JJJ	NOX	NSPS JJJJ	§60.4233(e)-Table 1 6
	GRP-EGU	OP-UA2	60JJJ	CO	NSPS JJJJ	§60.4233(e)-Table 1 19
	GRP-EGU	OP-UA2	60JJJ	VOC	NSPS JJJJ	§60.4233(e)-Table 1 28

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

Table 1b: Additions

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC	Area Name: Plains Texas I Facility	

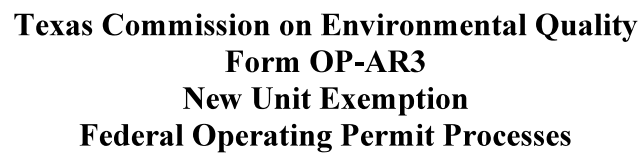
Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	GRP-EGU	60JJJ	NOX	[D]§60.4243(a)(2)(ii) [D]§60.4243(a)(2)(iii) [D]§60.4243(b)(2)(ii) [D]§60.4243(e) [D]§60.4244(a) [D]§60.4244(b) [D]§60.4244(c) [D]§60.4244(d)	[D]§60.4243(a)(1) [D]§60.4243(a)(2)(i) [D]§60.4243(a)(2)(ii) [D]§60.4243(a)(2)(iii) [D]§60.4243(b)(2)(ii) [R]§60.4245(a) [D]§60.4245(a)(1) [R]§60.4245(a)(2) [D]§60.4245(a)(3) [D]§60.4245(a)(4)	[G]§60.4245(c) [D]§60.4245(d)
	GRP-EGU	60JJJ	CO	[D]§60.4243(a)(2)(ii) [D]§60.4243(a)(2)(iii) [D]§60.4243(b)(2)(ii) [D]§60.4243(e) [D]§60.4244(a) [D]§60.4244(b) [D]§60.4244(c) [D]§60.4244(e)	[D]§60.4243(a)(1) [D]§60.4243(a)(2)(i) [D]§60.4243(a)(2)(ii) [D]§60.4243(a)(2)(iii) [D]§60.4243(b)(2)(ii) [D]§60.4243(e) [R]§60.4245(a) [D]§60.4245(a)(1) [R]§60.4245(a)(2) [D]§60.4245(a)(3) [D]§60.4245(a)(4)	[G]§60.4245(c) [D]§60.4245(d)

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

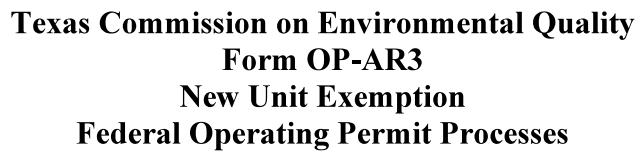
Table 1b: Additions

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC	Area Name: Plains Texas I Facility	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
	GRP-EGU	60JJJ	VOC	[D]§60.4243(a)(2)(ii) [D]§60.4243(a)(2)(iii) [D]§60.4243(b)(2)(ii) [D]§60.4243(e) [D]§60.4244(a) [D]§60.4244(b) [D]§60.4244(c) [D]§60.4244(f) [D]§60.4244(g)	[D]§60.4243(a)(1) [D]§60.4243(a)(2)(i) [D]§60.4243(a)(2)(ii) [D]§60.4243(a)(2)(iii) [D]§60.4243(b)(2)(ii) [D]§60.4243(e) [R]§60.4245(a) [D]§60.4245(a)(1) [R]§60.4245(a)(2) [D]§60.4245(a)(3) [D]§60.4245(a)(4)	[G]§60.4245(c) [D]§60.4245(d)



Nameplate Capacities	Fuel (Current)	Percent Sulfur (Current)	Fuel (Expected)	Percent Sulfur (Expected)
2.6 MWe			Pipeline-quality natural gas	<0.05%
Total:	2.6 MWe			



Nameplate Capacities	Fuel (Current)	Percent Sulfur (Current)	Fuel (Expected)	Percent Sulfur (Expected)
2.6 MWe			Pipeline-quality natural gas	<0.05%
Total:	2.6 MWe			

**Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule**

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC		Area Name: Plains Texas I Facility

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

Part 1

A. Compliance Plan — Future Activity Committal Statement	
The <i>Responsible Official</i> commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.	
B. Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)	
1. With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	☒ YES ☐ NO
2. Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☒ YES ☐ NO
3. If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. <i>(For reference only)</i>	3
* For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status. For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122. Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.	

**Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule**

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC		Area Name: Plains Texas I Facility

Part 2

A. Compliance Schedule		
If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. <i>(See form instruction for details.)</i> If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.		
1. Specific Non-Compliance Situation		
Unit/Group/Process ID No.(s): EGU1, EGU2, EGU3, EGU4		
SOP Index No.: 60JJJJ		
Pollutant: NO _x		
Applicable Requirement		
Citation	Text Description	
§ 60.4243(b)(2)(ii)	Conduct an initial performance test	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
§ 60.4243(b)(2)(ii)	Stack test results	HSE Manager's Office in Houston
3. Non-compliance Situation Description		
Initial performance testing was not completed within 180 days of the initial startup of the engines.		
4. Corrective Action Plan Description		
Conduct initial performance testing		
5. List of Activities/Milestones to Implement the Corrective Action Plan		
Schedule initial performance testing.		
Conduct initial performance testing.		
Submit a report for initial performance testing.		

**Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule**

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC		Area Name: Plains Texas I Facility

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Progress reports will be submitted every 6 months from the date of this submittal.	

**Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule**

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC		Area Name: Plains Texas I Facility

Part 2

A. Compliance Schedule		
If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. <i>(See form instruction for details.)</i> If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.		
1. Specific Non-Compliance Situation		
Unit/Group/Process ID No.(s): EGU1, EGU2, EGU3, EGU4		
SOP Index No.: 60JJJJ		
Pollutant: CO		
Applicable Requirement		
Citation	Text Description	
§ 60.4243(b)(2)(ii)	Conduct an initial performance test	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
§ 60.4243(b)(2)(ii)	Stack test results	HSE Manager's Office in Houston
3. Non-compliance Situation Description		
Initial performance testing was not completed within 180 days of the initial startup of the engines.		
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Conduct initial performance testing		
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Schedule initial performance testing.		
Conduct initial performance testing.		
Submit a report for initial performance testing.		

**Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule**

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC		Area Name: Plains Texas I Facility

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Progress reports will be submitted every 6 months from the date of this submittal.	

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC		Area Name: Plains Texas I Facility

Part 2

A. Compliance Schedule		
If there are non-compliance situations ongoing at time of application, then complete a separate OP-ACPS Part 2 for each separate non-compliance situation. <i>(See form instruction for details.)</i> If there are no non-compliance situations ongoing at time of application, then this section is not required to be completed.		
1. Specific Non-Compliance Situation		
Unit/Group/Process ID No.(s): EGU1, EGU2, EGU3, EGU4		
SOP Index No.: 60JJJJ		
Pollutant: VOC		
Applicable Requirement		
Citation	Text Description	
§ 60.4243(b)(2)(ii)	Conduct an initial performance test	
2. Compliance Status Assessment Method and Records Location		
Citation	Text Description	Location of Records/Documentation
§ 60.4243(b)(2)(ii)	Stack test results	HSE Manager's Office in Houston
3. Non-compliance Situation Description		
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Submit a report for initial performance testing.		

**Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule**

Date: 03/24/2025	Regulated Entity No.: RN111658415	Permit No.: O4457
Company Name: RPC Toll, LLC		Area Name: Plains Texas I Facility

Part 2 (continued)

6. Previously Submitted Compliance Plan(s)	
Type of Action	Date Submitted
N/A	N/A
7. Progress Report Submission Schedule	
Progress reports will be submitted every 6 months from the date of this submittal.	



New Unit Exemption

For more information, see instructions and refer to 40 CFR 72.7

This submission is: ☐ New ☒ Revised

STEP 1

Identify the new unit by plant name, State, Plant Code (ORISPL) and unit ID#.

Plains Texas I Facility	Texas	NA	
Plant Name	State	Plant Code	Unit ID#

STEP 2

List the generator ID numbers and, to one decimal place, the nameplate capacity of each generator served by the unit. Then total nameplate capacity and enter the result.

EUG5 GEN ID #	EUG6 GEN ID #	GEN ID #	GEN ID #	GEN ID #	TOTAL
2.6 MWe	2.6 MWe				5.2 MWe

STEP 3

List all fuels currently burned or expected to be burned, by the unit and the percent sulfur content by weight of each.

Fuel (current)	Sulfur Content (current)	Fuel (expected)	Sulfur Content (expected)
Natural Gas	<0.05 %	Natural Gas	<0.05 %
Natural Gas	<0.05 %	Natural Gas	<0.05 %

STEP 4

Identify the first full calendar year in which the unit meets (or will meet) the requirements of 40 CFR 72.7(a).

January 1, 2026

STEP 5

Read the special provisions.

Special Provisions

(1) The owners and operators and, to the extent applicable, the designated representative of a unit exempt under 40 CFR 72.7 shall (i) comply with the requirements of 40 CFR 72.7(a) for all periods for which the unit is exempt under 40 CFR 72.7 and (ii) comply with the requirements of the Acid Rain Program concerning all periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.

(2) For any period for which a unit is exempt under 40 CFR 72.7, the unit is not an affected unit under the Acid Rain Program and 40 CFR parts 70 and 71 and is not eligible to be an opt-in source under 40 CFR part 74. As an unaffected unit, the unit shall continue to be subject to any other applicable requirements under 40 CFR parts 70 and 71.

(3) For a period of 5 years from the date the records are created, the owners and operators of a unit exempt under 40 CFR 72.7 shall retain at the source that includes the unit records demonstrating that the requirements of 40 CFR 72.7(a) are met. The 5-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the Administrator or the permitting authority. Such records shall include, for each delivery of fuel to the unit or for fuel delivered to the unit continuously by pipeline, the type of fuel, the sulfur content, and the sulfur content of each sample taken. The owners and operators bear the burden of proof that the requirements of paragraph 40 CFR 72.7(a) are met.

(4) On the earliest of the following dates, a unit exempt under 40 CFR 72.7(b), (c), or (e) shall lose its exemption and become an affected unit under the Acid Rain Program and 40 CFR parts 70 and 71: (i) the date on which the unit first serves one or more generators with total nameplate capacity in excess of 25 MWe; (ii) the date on which the unit burns any coal or coal-derived fuel except for coal-derived gaseous fuel with a total sulfur content no greater than natural gas; or (iii) January 1 of the year following the year in which the annual average sulfur content for gaseous fuel burned at the unit exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)) or for nongaseous fuel burned at the unit

exceeds 0.05 percent by weight (as determined under 40 CFR 72.7(d)). Notwithstanding 40 CFR 72.30(b) and (c), the designated representative for a unit that loses its exemption under 40 CFR 72.7 shall submit a complete Acid Rain permit application on the later of January 1, 1998 or 60 days after the first date on which the unit is no longer exempt. For the purpose of applying monitoring requirements under 40 CFR part 75, a unit that loses its exemption under 40 CFR 72.7 shall be treated as a new unit that commenced commercial operation on the first date on which the unit is no longer exempt.

STEP 6

Read the appropriate certification and sign and date.

Certification (for designated representatives only)

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	
Signature	Date

Certification (for certifying officials only)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Darla Kuntz		Title HSE Manager	
Company Owner Name RPC Toll, LLC			
Mailing Address 820 Gessner Rd, Suite 895	City Houston	TX State	77024 Zip Code
Phone 281-635-3409	Email Address dkuntz@conduitpower.co		
Signature		Date	

Certification (for additional certifying officials, if applicable)

I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	Title		
Company Owner Name			
Mailing Address	City	State	77024 Zip Code
Phone	Email Address		
Signature	Date		