

**From:** [Loren Ladd](#)  
**To:** [Liam Lin](#)  
**Cc:** [Ryan Pickett](#); [LINDSEY RENFRO](#); [Darla Kuntz](#); [Alice Tabor](#); [R6AirPermitsTX](#); [Vickie Mclean](#)  
**Subject:** RE: Working Draft Permit - O4463 Conduit TollCo, LLC (Significant Revision, 38117)  
**Date:** Monday, January 26, 2026 1:12:43 PM  
**Attachments:** [image002.png](#)  
[image004.png](#)

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Hi Liam,

Thank you for that explanation! As requested, we have submitted the first part of the OP-ACPS form.

Have a great day!

**Loren Ladd**

Consulting Specialist, BSI Consulting

T: 512.657.2848

[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)

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

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

*Notice: I will be in the field from Jan. 26<sup>th</sup> – Feb. 19<sup>th</sup> & my responses will be delayed.*



---

**From:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>  
**Sent:** Friday, January 23, 2026 3:33 PM  
**To:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>  
**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit - O4463 Conduit TollCo, LLC (Significant Revision, 38117)

**\* This message originated from outside of BSI. Please treat hyperlinks, attachments and instructions in this email with caution. \***

Good afternoon Loren,

Thank you for the updated forms. You are correct, once the non-compliance situation has been addressed, part II of this form is no longer required. However, you still need to update the information in part 1, questions B.2 and B.3 which still shows you have units addressed in the Compliance Schedule (Part 2) . Please submit an updated form OP-ACPS to reflect the changes.

Sincerely,

*Liam Lin*

Permit Reviewer

## Texas Commission on Environmental Quality

Title V Existing

4463

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SUNBRIDGE FACILITY
County	MARTIN
Latitude (N) (##.#####)	32.227222
Longitude (W) (-###.#####)	102.077222
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)?	RN111718532
What is the name of the Regulated Entity (RE)?	CONDUIT TOLLCO SUNBRIDGE FACILITY
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2045 COUNTY ROAD 3200
City	TARZAN
State	TX
ZIP	79783
County	MARTIN
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)?	CN606129708
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Conduit Tollco, LLC
Texas SOS Filing Number	804976989
Federal Tax ID	922489981
State Franchise Tax ID	32088912657
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 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.	DARLA KUNTZ(CONDUIT TOLLCO ... )
Organization Name	CONDUIT TOLLCO 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
Routing (such as Mail Code, Dept., or Attn:)	STE 895
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

Conduit TollCo LLC

MS

Darla

Kuntz

HSE Manager

Domestic

820 GESSNER RD STE 895

HOUSTON

TX

77024

2816353409

dkuntz@conduitpower.co

## Title V General Information - Existing

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1) Permit Type:

SOP

2) Permit Latitude Coordinate:

32 Deg 13 Min 38 Sec

3) Permit Longitude Coordinate:

102 Deg 4 Min 38 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.

4463-38117

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

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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.

[File Properties]

File Name	<a href="/ePermitsExternal/faces/file?fileId=309508">Sunbridge OP-ACPS 012326.pdf</a>
Hash	88973E85390B079FC76474CC1DF111C0437609564F9F4BB9E34145830EA5265B
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 4463.
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:	2026-01-26
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	26DCBD63B136D07D51C3F2A15497EBBB9D1D9F98ADECC1F7ED64F0141E245798

## Submission

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Reference Number:	The application reference number is 884239
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2026-01-26 at 09:02:55 CST
Submitted From:	The application was submitted from IP address 98.199.123.164
Confirmation Number:	The confirmation number is 735644
Steers Version:	The STEERS version is 6.94
Permit Number:	The permit number is 4463

## Additional Information

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Application Creator: This account was created by Loren Ladd

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

<b>Date:</b> 01/23/2026	<b>Regulated Entity No.:</b> RN111718532	<b>Permit No.:</b> O4463
<b>Company Name:</b> Conduit TollCo, LLC		<b>Area Name:</b> Sunbridge 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**

<b>A. Compliance Plan — Future Activity Committal Statement</b>	
<p>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.</p>	
<b>B. Compliance Certification - Statement for Units in Compliance*</b> (Indicate response by entering an "X" in the appropriate column)	
<b>1.</b> 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?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>2.</b> Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>3.</b> 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>	
<p>* <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.</i></p> <p><i>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.</i></p>	

OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278  
Fax: (512) 239-1400



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

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**From:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>  
**Sent:** Friday, January 23, 2026 2:57 PM  
**To:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>  
**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit - O4463 Conduit TollCo, LLC (Significant Revision, 38117)

Happy Friday, Liam!

**OP-1:** Thank you for your instructions. The OP-1 was submitted via STEERS to update the TC to Darla Kuntz.

**OP-ACPS:** Since the submission of this application, the non-compliance item mentioned in the OP-ACPS form has been resolved. Initial NSPS JJJJ performance testing of EUG1 and EUG 2 occurred on April 16 and 17<sup>th</sup>, 2025, and the corresponding results were submitted to the TCEQ on June 18<sup>th</sup>, 2025. The testing results showed that CO emission rates for these units exceeded the regulatory limit provided in the original issuance of Standard Permit No. 172516, so an application to revise said Stand Permit and update the hourly CO emission limit to 15lb/hr. was submitted and then approved by the TCEQ on July 3, 2025.

If I understand the instructions on the OP-ACPS form correctly, once the non-compliance situation has been addressed, Part II of this form is no longer required. Because there are no outstanding non-compliance situations, an OP-ACPS form was not submitted. Please advise if otherwise.

Thank you!

**Loren Ladd**

Consulting Specialist, BSI Consulting

T: 512.657.2848

[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)

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

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



Your partner  
in progress

## Texas Commission on Environmental Quality

Title V Existing

4463

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SUNBRIDGE FACILITY
County	MARTIN
Latitude (N) (##.#####)	32.227222
Longitude (W) (-###.#####)	102.077222
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)?	RN111718532
What is the name of the Regulated Entity (RE)?	CONDUIT TOLLCO SUNBRIDGE FACILITY
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2045 COUNTY ROAD 3200
City	TARZAN
State	TX
ZIP	79783
County	MARTIN
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)?	CN606129708
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Conduit Tollco, LLC
Texas SOS Filing Number	804976989
Federal Tax ID	922489981
State Franchise Tax ID	32088912657
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 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.	DARLA KUNTZ(CONDUIT TOLLCO ... )
Organization Name	CONDUIT TOLLCO 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
Routing (such as Mail Code, Dept., or Attn:)	STE 895
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

Conduit TollCo 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:

SOP

2) Permit Latitude Coordinate:

32 Deg 13 Min 38 Sec

3) Permit Longitude Coordinate:

102 Deg 4 Min 38 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.

4463-38117

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

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Attach OP-1 (Site Information Summary)

[File Properties]

File Name <a href=/ePermitsExternal/faces/file?fileId=309432>OP-1 012326 - update to TC.pdf</a>  
Hash C56E3C2AE9BC28252B3CBF3307D851A9D707C57DD35BBB1BB95B4C9EFF190C0D  
MIME-Type application/pdf

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.

## 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 4463.
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:	2026-01-23
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	9E1844A1CBE0CC7EAF3880E9110F92B6EC81F6FF06BFA9803C0D3CEFF1167BD8

## Submission

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Reference Number:	The application reference number is 884138
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2026-01-23 at 13:49:48 CST
Submitted From:	The application was submitted from IP address 98.199.123.164
Confirmation Number:	The confirmation number is 735360
Steers Version:	The STEERS version is 6.94
Permit Number:	The permit number is 4463

## Additional Information

---

Application Creator: This account was created by Loren Ladd

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

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

<b>I. Company Identifying Information</b>
A. Company Name: Conduit TollCo, LLC
B. Customer Reference Number (CN): CN606129708
C. Submittal Date (mm/dd/yyyy): 01/23/2026
<b>II. Site Information</b>
A. Site Name: Sunbridge Facility
B. Regulated Entity Reference Number (RN): RN111718532
C. Indicate affected state(s) required to review permit application: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> AR <input type="checkbox"/> CO <input type="checkbox"/> KS <input type="checkbox"/> LA <input type="checkbox"/> NM <input type="checkbox"/> OK <input checked="" type="checkbox"/> N/A
D. Indicate all pollutants for which the site is a major source based on the site's potential to emit: <i>(Check the appropriate box[es].)</i>
<input type="checkbox"/> VOC <input checked="" type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> PM <sub>10</sub> <input checked="" type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> HAPS
Other:
E. Is the site a non-major source subject to the Federal Operating Permit Program? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
F. Is the site within a local program area jurisdiction? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
G. Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
H. Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:
<b>III. Permit Type</b>
A. Type of Permit Requested: <i>(Select only one response)</i>
<input checked="" type="checkbox"/> Site Operating Permit (SOP) <input type="checkbox"/> Temporary Operating Permit (TOP) <input type="checkbox"/> General Operating Permit (GOP)

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

<b>IV. Initial Application Information</b> <i>(Complete for Initial Issuance Applications Only.)</i>	
A. Is this submittal an abbreviated or a full application?	<input type="checkbox"/> Abbreviated <input checked="" type="checkbox"/> Full
B. If this is a full application, is the submittal a follow-up to an abbreviated application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
C. If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?	<input type="checkbox"/> YES <input type="checkbox"/> NO
D. Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>V. Confidential Information</b>	
A. Is confidential information submitted in conjunction with this application?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>VI. Responsible Official (RO) Identifying Information</b>	
RO Name Prefix: ( <input checked="" type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)	
RO Full Name: Matthew Bulpitt	
RO Title: Chief Operating Officer	
Employer Name: Conduit TollCo, LLC	
Mailing Address: 820 Gessner Rd, Suite 895	
City: Houston	
State: Texas	
ZIP Code: 77024	
Territory:	
Country: Harris	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: 817-975-2085	
Fax No.:	
Email: mbulpitt@conduitpower.co	

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

<b>VII. Technical Contact Identifying Information</b> <i>(Complete if different from RO.)</i>
Technical Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Technical Contact Full Name: Darla Kuntz
Technical Contact Title: HSE Manager
Employer Name: Conduit TollCo, LLC
Mailing Address: 820 Gessner Rd, Suite 895
City: Houston
State: Texas
ZIP Code: 77024
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 281-635-3409
Fax No.:
Email: dkuntz@conduitpower.co
<b>VIII. Reference Only Requirements</b> <i>(For reference only.)</i>
<b>A.</b> State Senator: Kevin Sparks
<b>B.</b> State Representative: Tom Russell Craddick
<b>C.</b> Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A</span>
<b>D.</b> Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>
<b>E.</b> Indicate the alternate language(s) in which public notice is required: Spanish

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

<b>IX. Off-Site Permit Request</b> <i>(Optional for applicants requesting to hold the FOP and records at an off-site location.)</i>
<b>A.</b> Office/Facility Name:
<b>B.</b> Physical Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
<b>C.</b> Physical Location:
<b>D.</b> Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.)
Contact Full Name:
<b>E.</b> Telephone No.:
<b>X. Application Area Information</b>
<b>A.</b> Area Name: Sunbridge Facility
<b>B.</b> Physical Address: 2045 County Road 3200
City: Tarzan
State: Texas
ZIP Code: 79783
<b>C.</b> Physical Location:
<b>D.</b> Nearest City: Tarzan
<b>E.</b> State: Texas
<b>F.</b> ZIP Code: 79783

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

<b>X. Application Area Information (continued)</b>
<b>G.</b> Latitude (nearest second): 32:13:37.87
<b>H.</b> Longitude (nearest second): 102:04:37.86
<b>I.</b> Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>J.</b> Indicate the estimated number of emission units in the application area: 4
<b>K.</b> Are there any emission units in the application area subject to the Acid Rain Program? <span style="float: right;"><input type="checkbox"/> YES <input checked="" type="checkbox"/> NO</span>
<b>XI. Public Notice</b> <i>(Complete this section for SOP Applications and Acid Rain Permit Applications only.)</i>
<b>A.</b> Name of a public place to view application and draft permit: Martin County Library
<b>B.</b> Physical Address: 200 St Mary St
City: Stanton
ZIP Code: 79782
<b>C.</b> Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: ( <input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr.):
Contact Person Full Name: Darla Kuntz
Contact Mailing Address: 820 Gessner Rd, Suite 895
City: Houston
State: Texas
ZIP Code: 77024
Territory:
Country: Harris
Foreign Postal Code:
Internal Mail Code:
Telephone No.: 281-635-3409

---

**From:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>  
**Sent:** Thursday, January 22, 2026 10:12 AM  
**To:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>  
**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit - O4463 Conduit TollCo, LLC (Significant Revision, 38117)

**\* This message originated from outside of BSI. Please treat hyperlinks, attachments and instructions in this email with caution. \***

Good morning Loren,

There are a few issues with the application which are listed below.

1. OP-ACPS – Unit ID. EGU1 and EGU2 - Milestones must 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 have included a deadline like “Schedule initial performance testing by January 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.

The final milestone you listed 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, you could revise that to “Submit a report for initial performance testing within 60 days of conducting the testing.”

2. OP-1 – The current Technical Contact (TC) listed in our database is Muneeb Agha, however according to the COR, the TC has been updated to Ms. Darla Kuntz. Please submit an updated form OP-1 with the new TC information.

Please submit the updated forms through STEERS by Close of Business on **January 26, 2026** . Please notify me via email once this step has been completed.

Sincerely,

***Liam Lin***

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278

Fax: (512) 239-1400

**From:** [Loren Ladd](#)  
**To:** [Liam Lin](#)  
**Cc:** [Ryan Pickett](#); [LINDSEY RENFRO](#); [Darla Kuntz](#); [Alice Tabor](#); [R6AirPermitsTX](#); [Vickie Mclean](#)  
**Subject:** RE: Working Draft Permit - O4463 Conduit TollCo, LLC (Significant Revision, 38117)  
**Date:** Thursday, November 20, 2025 5:34:15 PM  
**Attachments:** [image002.png](#)

---

Good evening, Liam,

A modified Process Description has been submitted through STEERS. In addition, we've also submitted documentation to reflect an update in RO and to correct the misrepresentation of Darla's email in the STEERS system (.co instead of .com).

Finally, we approve of the WDP.

Thank you,

**Loren Ladd**

Consulting Specialist, BSI Consulting

T: 512.657.2848

[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)

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

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



**From:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>  
**Sent:** Monday, November 17, 2025 3:45 PM  
**To:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>  
**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>  
**Subject:** RE: Working Draft Permit - O4463 Conduit TollCo, LLC (Significant Revision, 38117)

**\* This message originated from outside of BSI. Please treat hyperlinks, attachments and instructions in this email with caution. \***

Good Afternoon Loren,

Thank you for your response. I forgot that November 27, 2025 is the Thanksgiving holiday, I am extending the deadline to Close of Business on **December 2, 2025**.

Sincerely,

*Liam Lin*

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087

## Texas Commission on Environmental Quality

Title V Existing

4463

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SUNBRIDGE FACILITY
County	MARTIN
Latitude (N) (##.#####)	32.227222
Longitude (W) (-###.#####)	102.077222
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)?	RN111718532
What is the name of the Regulated Entity (RE)?	CONDUIT TOLLCO SUNBRIDGE FACILITY
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2045 COUNTY ROAD 3200
City	TARZAN
State	TX
ZIP	79783
County	MARTIN
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)?	CN606129708
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Conduit Tollco, LLC
Texas SOS Filing Number	804976989
Federal Tax ID	922489981
State Franchise Tax ID	32088912657
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	Conduit TollCo 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 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.	DARLA KUNTZ(CONDUIT TOLLCO ... )
Organization Name	CONDUIT TOLLCO 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
Routing (such as Mail Code, Dept., or Attn:)	STE 895
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.

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

Conduit TollCo 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:

SOP

2) Permit Latitude Coordinate:

32 Deg 13 Min 38 Sec

3) Permit Longitude Coordinate:

102 Deg 4 Min 38 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.

4463-38117

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	<a href="/ePermitsExternal/faces/file?fileId=295746">/ePermitsExternal/faces/file?fileId=295746</a> >OP-CRO2 - Sunbridge RO Change - signed 11.20.2025.pdf</a>
Hash	BE38EFA4DD02BA990DD9E6231029C5B1B9BC2AE8CD1B866386A87098570515A0
MIME-Type	application/pdf

Attach OP-DEL (Delegation of Responsible Official)

[File Properties]

File Name	<a href="/ePermitsExternal/faces/file?fileId=295742">/ePermitsExternal/faces/file?fileId=295742</a> >OP-DEL Sunbridge RO Change - signed 11.20.2025.pdf</a>
Hash	A8661A830862318FF2F7E5FD7C960CB57642786AB96029DB03F2DE40AA5ED532
MIME-Type	application/pdf

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	<a href="/ePermitsExternal/faces/file?fileId=295743">/ePermitsExternal/faces/file?fileId=295743</a> >OP-CRO1 - Sunbridge RO Change - signed 11.20.2025.pdf</a>
Hash	B8365C64E736C2A2A3AFC4F8C6829D3C3379B44448FD0FD68A7757F16FA6FB
MIME-Type	application/pdf

[File Properties]

File Name	<a href="/ePermitsExternal/faces/file?fileId=295752">/ePermitsExternal/faces/file?fileId=295752</a> >Sunbridge Process Description 112025.pdf</a>
Hash	F3AC25B1104E199654BD24E4C7507E939895B0C71959B0A6FD703CAE7E7A53BE
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 4463.
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:	2025-11-20
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	72E3E6A5B6119416565FED70022F01CFEFA5DCAD5069264CE916FAFF89D8CDA5

## Submission

Reference Number:	The application reference number is 842293
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-11-20 at 16:05:55 CST
Submitted From:	The application was submitted from IP address 99.26.233.1
Confirmation Number:	The confirmation number is 697631
Steers Version:	The STEERS version is 6.93
Permit Number:	The permit number is 4463

## Additional Information

Application Creator: This account was created by Loren Ladd

# **Conduit TollCo, LLC – Sunbridge Facility**

## **Process Description**

Conduit TollCo, LLC (Conduit) proposes to install and operate four 2.5-Megawatt (MW) mtu/Rolls-Royce pipeline quality natural gas-fired engines (Model: GG20V4000) at the Sunbridge Facility (Facility) located at 2400 County Road 3200 in Tarzan, Texas to generate and provide non-emergency electrical power to oil and gas operations and the electrical grid. The proposed electric generating units (EGUs; Emission Point Numbers [EPNs] EGU1, EGU2, EGU3, and EGU4) are fired with pipeline-quality natural gas with a sulfur content of 10 grains per one hundred standard cubic feet (gr/100 scf) or less.

The emissions calculations for the proposed EGUs are conservatively based on 8,760 hours per year (hr/yr) for each of EGUs; therefore, the EGUs are not limited on annual hours of operation. Emissions are estimated based on a combination of vendor supplied emission profiles and emission factors from United States Environmental Protection Agency (U.S. EPA) AP-42 Chapter 3.2, Table 3.2-1 for 2-stroke lean-burn engines.

Fugitive component emissions (EPN FUG1) from the natural gas supply to the EGUs are calculated based on Oil and Gas Production Operation emission factors from Texas Commission on Environmental Quality (TCEQ) Fugitive Guidance (APDG 6422; June 2018).

Conduit additionally proposes to install a diesel-fired emergency generator (EPN ENG1) at the Facility, which will provide backup power to maintain operations in the event of a main power supply interruption. The generator will be authorized under Permit-by-Rule (PBR) 106.511 – Portable and Emergency Engines and Turbines.

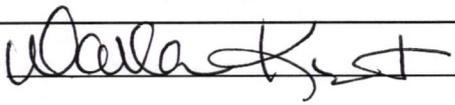
**Form OP-CRO1**  
**Certification by Responsible Official**  
**Federal Operating Permit Program**  
**Texas Commission on Environmental Quality**

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

<b>I. Identifying Information</b>	
RN: RN111718532	
CN: CN606129708	
Account No.: MFA038L	
Permit No.: O4463	
Project No.: 38117	
Area Name: Sunbridge Facility	
Company Name: Conduit TollCo, LLC	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input type="checkbox"/> Responsible Official	<input checked="" type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

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

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.

<b>IV. Certification of Truth</b>	
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>	
I, Darla Kuntz _____ certify that I am the DAR _____ <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <span><i>(Certifier Name printed or typed)</i></span> <span><i>(RO or DAR)</i></span> </div> <p>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></p>	
Time Period: From _____ to _____ <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <span><i>(Start Date)</i></span> <span><i>(End Date)</i></span> </div>	
Specific Dates: _____ <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <span><i>(Date 1)</i></span> <span><i>(Date 2)</i></span> <span><i>(Date 3)</i></span> <span><i>(Date 4)</i></span> </div>	
_____ <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <span><i>(Date 5)</i></span> <span><i>(Date 6)</i></span> </div>	
Signature: 	Signature Date: 11/20/2025
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.

<b>I. Identifying Information</b>
Account No.: MFA038L
Regulated Entity Number: RN111718532
Customer Reference Number: CN606129708
Permit Number: O4463
Area Name: Sunbridge Facility
Company: Conduit TollCo, LLC
<b>II. Change Type</b>
Action Type: <input checked="" type="checkbox"/> New Appointment <input type="checkbox"/> Administrative Information Change
Contact Type ( <b>only one response accepted per form</b> ): <input checked="" type="checkbox"/> Responsible Official <input type="checkbox"/> Designated Representative ( <i>Acid Rain Program and/or CSAPR sources only</i> ) <input type="checkbox"/> 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**

<b>III. Responsible Official/Designated Representative/Alternate Designated Representative Information</b>
Conventional Title:
<input checked="" type="checkbox"/> Mr.
<input type="checkbox"/> Mrs.
<input type="checkbox"/> Ms.
<input type="checkbox"/> Dr.
Name (Driver's License/STEERS): Matthew Bulpitt
Title: Chief Operating Officer
Appointment Effective Date:
Telephone Number: 817-975-2084
Fax Number.:
Company Name: RPC Merchant, 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: 11/20/2025

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

<b>I. Identifying Information</b>
Account Number: MFA038L
Regulated Entity Number: RN111718532
Customer Reference Number: CN606129708
Permit Number: O4463
Area Name: Sunbridge Facility
Company Name: Conduit TollCo, LLC
<b>II. Duly Authorized Representative Information</b>
Action Type: <input checked="" type="checkbox"/> New DAR Identification <input type="checkbox"/> Administrative Information Change
Conventional Title: <input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.
Name (Driver License/STEERS): Darla Kuntz
Title: HSE Manager
Delegation Effective Date:
Telephone Number: 281-635-3409
Fax Number:
Company Name: Conduit TollCo, LLC
Mailing Address: 820 Gessner Road, 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**

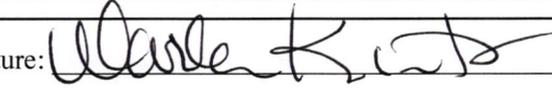
**III. Certification of Truth, Accuracy, and Completeness**

I, Matthew Bulpitt  
(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: 11/20/2025

Duly Authorized Representative Signature: 

(Name(s) printed or typed) Darla Kuntz

Date: 11/20/2025

**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: \_\_\_\_\_

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

<b>I. Identifying Information</b>
Account Number: MFA038L
Regulated Entity Number: RN111718532
Customer Reference Number: CN606129708
Permit Number: O4463
Area Name: Sunbridge Facility
Company Name: Conduit TollCo, LLC
<b>II. Duly Authorized Representative Information</b>
Action Type: <input checked="" type="checkbox"/> New DAR Identification <input type="checkbox"/> Administrative Information Change
Conventional Title: <input type="checkbox"/> Mr. <input checked="" type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr.
Name (Driver License/STEERS): Darla Kuntz
Title: HSE Manager
Delegation Effective Date:
Telephone Number: 281-635-3409
Fax Number:
Company Name: Conduit TollCo, LLC
Mailing Address: 820 Gessner Road, 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, Matthew Bulpitt  
(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: 11/20/2025

Duly Authorized Representative Signature: 

(Name(s) printed or typed) Darla Kuntz

Date: 11/20/2025

**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: \_\_\_\_\_

[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278

Fax: (512) 239-1400



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---

**From:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>

**Sent:** Monday, November 17, 2025 3:40 PM

**To:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>

**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>

**Subject:** RE: Working Draft Permit - O4463 Conduit TollCo, LLC (Significant Revision, 38117)

Hi Liam,

Thank you for providing the WDP. We are working to review the document and make the requested updates to the Process Description.

These items will be completed by the timeline you provided.

Thank you,

**Loren Ladd**

Consulting Specialist, BSI Consulting

T: 512.657.2848

[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)

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

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



Your partner  
in progress



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**From:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>

**Sent:** Friday, November 14, 2025 3:52 PM

**To:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>

**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>

**Subject:** RE: Working Draft Permit - O4463 Conduit TollCo, LLC (Significant Revision, 38117)

**\* This message originated from outside of BSI. Please treat hyperlinks, attachments and instructions in this email with caution. \***

Good Afternoon Loren,

I have conducted a technical review of *revision* application for *Conduit TollCo LLC, Sunbridge*

*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 Close of Business on **November 27, 2025**.

**There is an update required for your application which is listed below.**

1. Process Description – Please submit an updated process description to include the new diesel – fueled emergency generator.

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

Please review the second portion of the “SOP Technical Review Fact Sheet” located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding 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](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).**

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

Thank you for your cooperation.

Sincerely,

Sincerely,

*Liam Lin*

Permit Reviewer

OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality

MC-163, P.O. Box 13087

Austin, TX 78711-3087  
[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278  
Fax: (512) 239-1400



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---

**From:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>  
**Sent:** Friday, August 1, 2025 5:04 PM  
**To:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>  
**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>  
**Subject:** RE: Technical Review - O4463 Conduit Tollco, LLC (Significant Revision, 38117)

Good afternoon, Liam,

I wanted to confirm that the requested items have been submitted through STEERS. We look forward to your review.

Have a great weekend!

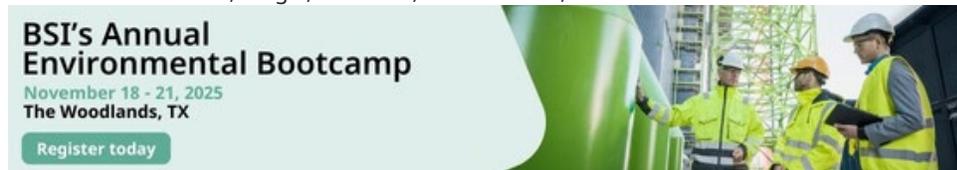
**Loren Ladd**

Consulting Technician, BSI Consulting

T: 512.657.2848

[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)  
[bsigroup.com](http://bsigroup.com) | [LinkedIn](#)

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



---

**From:** Loren Ladd  
**Sent:** Tuesday, July 29, 2025 3:52 PM  
**To:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>  
**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>  
**Subject:** RE: Technical Review - O4463 Conduit Tollco, LLC (Significant Revision, 38117)

Good afternoon, Liam,

Thank you for providing the guidance below!

Before August 1<sup>st</sup>, we will have the requested forms completed and uploaded into STEERS. I will notify

## Texas Commission on Environmental Quality

Title V Existing

4463

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SUNBRIDGE FACILITY
County	MARTIN
Latitude (N) (##.#####)	32.227222
Longitude (W) (-###.#####)	102.077222
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)?	RN111718532
What is the name of the Regulated Entity (RE)?	CONDUIT TOLLCO SUNBRIDGE FACILITY
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2045 COUNTY ROAD 3200
City	TARZAN
State	TX
ZIP	79783
County	MARTIN
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)?	CN606129708
Type of Customer	Partnership
Full legal name of the applicant:	
Legal Name	Conduit Tollco, LLC
Texas SOS Filing Number	804976989
Federal Tax ID	922489981
State Franchise Tax ID	32088912657
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	CONDUIT TOLLCO LLC
Prefix	MR
First	MATTHEW
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.	DARLA KUNTZ(CONDUIT TOLLCO ... )
Organization Name	CONDUIT TOLLCO 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
Routing (such as Mail Code, Dept., or Attn:)	STE 895
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

Conduit TollCo 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

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

STE 895

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:

32 Deg 13 Min 38 Sec

3) Permit Longitude Coordinate:

102 Deg 4 Min 38 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.

4463-38117

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)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=273114>OP-REQ1 Sunbridge - Emergency Generator Addition.pdf</a>
Hash	A99A90F9A9E29608888D6B2A9464F659BB8F85510B619027A2B63D25530853C2
MIME-Type	application/pdf

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

Attach OP-PBR SUP (Permits by Rule Supplemental Table)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=273139>OP-PBR SUP Sunbridge - Emergency Generator Addition.pdf</a>
Hash	B7AEA1F7662D2A5F2A0A20439E6746B711DB59BFDA11AFFA064D12CBB250EEA1
MIME-Type	application/pdf

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=273116>OP-SUMR Sunbridge - Emergency Generator Addition.pdf</a>
Hash	986F4F12B5780C0E875964F04F5B75ADE02D0D365A9D70EFA7915F8A9F0F6D60
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=273129>OP-UA2 Sunbridge - Emergency Generator Addition.pdf</a>
Hash	438CA791516FDC754BE9A32CC20E5BBBD6B5AC969E94C344B75FB6BA14959E32
MIME-Type	application/pdf

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach Void Request Form

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	<a href=/ePermitsExternal/faces/file?fileId=273160>OP-2 Sunbridge - Emergency Generator Addition.pdf</a>
Hash	4F22545D225FEA3D7DB276B70E620688A09E424F9546B02F20442E259A9943CB
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 4463.
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:	2025-08-01
Signature Hash:	A30AC772EF3E1D64586F267F1BEE0907EB0241600E26995012666A83D8B2680C
Form Hash Code at time of Signature:	18E6934C40570B45B132E028CC0113B9BF768BB60E8020E866B328EA8CAAC732

### Submission

Reference Number:	The application reference number is 805925
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-08-01 at 17:02:34 CDT
Submitted From:	The application was submitted from IP address 98.199.123.164
Confirmation Number:	The confirmation number is 668680
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 4463

### Additional Information

Application Creator: This account was created by Loren Ladd

**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
08/01/2025	O4463	RN111718532

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
08/01/2025	O4463	RN111718532

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
08/01/2025	O4463	RN111718532

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
08/01/2025	O4463	RN111718532

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.

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

Date:	8/01/2025
Permit No.:	O44633
RN No.:	111718532

*For SOP applications, answer ALL questions unless otherwise directed.*

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

<b>Form OP-REQ1: Page 88</b>	
<b>XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)</b>	
◆ <b>I. Permits by Rule (30 TAC Chapter 106) for the Application Area</b>	
<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:
◆ <b>J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum</b>	
Permit No.:	Issuance Date:



**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.
8/01/2025	O4463	RN111718532

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

**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.
8/01/2025	O4463	RN111718532

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		







you once we have finished.

Best,

**Loren Ladd**

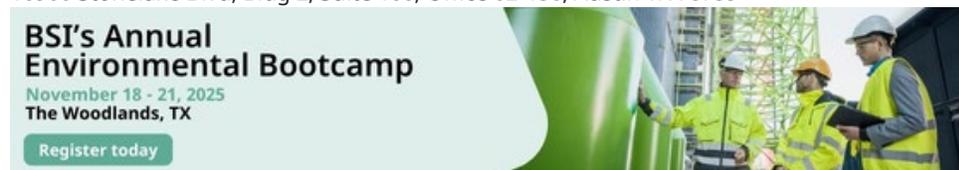
Consulting Technician, BSI Consulting

T: 512.657.2848

[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)

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

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



---

**From:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>

**Sent:** Tuesday, July 29, 2025 1:24 PM

**To:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>

**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>

**Subject:** RE: Technical Review - 04463 Conduit Tollco, LLC (Significant Revision, 38117)

**\* This message originated from outside of BSI. Please treat hyperlinks, attachments and instructions in this email with caution. \***

Good Afternoon Loren,

After reviewing your request for installing a diesel fueled emergency generator, I have determined that there are a few updates required for your application which are listed below.

1. Form OP-2-
  - Please submit an updated form OP-2 documenting this change.
2. Form OP-SUMR
  - Is this change only affecting Unit ID. ENG1? If so, please submit an updated form OP-SUMR removing this unit from GRP-EGU.
  - For Unit ID. ENG1, please update the Preconstruction Authorization (PCA) to include PBR 106.511, please also list the effective date of this PBR.
3. Form OP-UA2
  - You mentioned this generator is subject to 40 CFR Part 60, Subpart IIII, please submit an updated OP-UA2 with the inclusion of attributes for Subpart IIII starting on Table 5a.
4. Form OP-PBRSUP-
  - Since this change includes an addition of a PBR, please submit an updated Form OP-PBRSUP reflecting this change. Please submit Form OP-PBRSUP as a set including Tables A, B, C and D with the same updated submittal date at the top. If a table is not needed, please put N/A on the first line. All units listed on Table D must be listed on Tables A or B, all units listed on Tables A or B must be listed on table D.

Please submit the updated forms through STEERS by Close of Business on **August 1, 2025**. Please notify me by email when you complete this step.

Sincerely,

*Liam Lin*

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278

Fax: (512) 239-1400



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---

**From:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>

**Sent:** Tuesday, July 29, 2025 10:35 AM

**To:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>

**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>; R6AirPermitsTX <[r6airpermitstx@epa.gov](mailto:r6airpermitstx@epa.gov)>; Vickie Mclean <[vickie.mclean@tceq.texas.gov](mailto:vickie.mclean@tceq.texas.gov)>

**Subject:** RE: Technical Review - O4463 Conduit Tollco, LLC (Significant Revision, 38117)

Good morning, Liam,

Conduit TollCo, LLC is installing a diesel-fueled emergency generator at its Sunbridge 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. 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. EPA Region 6 and TCEQ Region 7 are in copy for transparency.

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](mailto:Loren.Ladd@bsigroup.com)

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

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



---

**From:** Liam Lin <[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)>

**Sent:** Tuesday, July 29, 2025 10:02 AM

**To:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>

**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>; Rhyan Stone <[Rhyan.Stone@tceq.texas.gov](mailto:Rhyan.Stone@tceq.texas.gov)>; Elizabeth Moorhead <[elizabeth.moorhead@tceq.texas.gov](mailto:elizabeth.moorhead@tceq.texas.gov)>

**Subject:** RE: Technical Review - O4463 Conduit Tollco, LLC (Significant Revision, 38117)

**\* This message originated from outside of BSI. Please treat hyperlinks, attachments and instructions in this email with caution. \***

Good Morning Loren,

I have been assigned to the Federal Operating Permit (FOP) revision application of Permit No. O4463 for Conduit Tollco, LLC, Sunbridge Facility. This application has been assigned Project No. 38117. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking.

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

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

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

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

Please notify me when these updates have been submitted.

**As required on Form OP-1, question IV.D, please remember the FOP application and all application**

updates must be submitted to EPA Region 6 at [R6AirPermitsTX@epa.gov](mailto:R6AirPermitsTX@epa.gov) and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at [Where to Submit FOP Applications and Permit-Related Documents](#).

Please review the "SOP Technical Review Fact Sheet" located at [http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title\\_V/sop\\_wdp\\_factsheet.pdf](http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf). This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

*Liam Lin*

Permit Reviewer  
OA/Air Permits Division/OP Section  
Texas Commission on Environmental Quality  
MC-163, P.O. Box 13087  
Austin, TX 78711-3087  
[Liam.Lin@tceq.texas.gov](mailto:Liam.Lin@tceq.texas.gov)

Phone: (512) 239-1278

Fax: (512) 239-1400



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---

**From:** Loren Ladd <[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)>

**Sent:** Tuesday, July 29, 2025 9:31 AM

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

**Cc:** Ryan Pickett <[Ryan.Pickett@bsigroup.com](mailto:Ryan.Pickett@bsigroup.com)>; LINDSEY RENFRO <[Lindsey.Renfro@bsigroup.com](mailto:Lindsey.Renfro@bsigroup.com)>; Darla Kuntz <[dkuntz@conduitpower.co](mailto:dkuntz@conduitpower.co)>; Alice Tabor <[Alice.Tabor@bsigroup.com](mailto:Alice.Tabor@bsigroup.com)>

**Subject:** Conduit TollCo, LLC/Sunbridge Facility/Title V Permit No. O4463

Good morning,

On behalf of Conduit TollCo, LLC (Conduit), I am inquiring about the status of the Title V O4463 Permit review. A permit reviewer has yet to contact us regarding the status of this project.

Conduit is seeking to include an Op-Notify form in the permit review. Can you please direct us to the person/reviewer who should receive and handle forms related to this project?

Thank you,

**Loren Ladd**

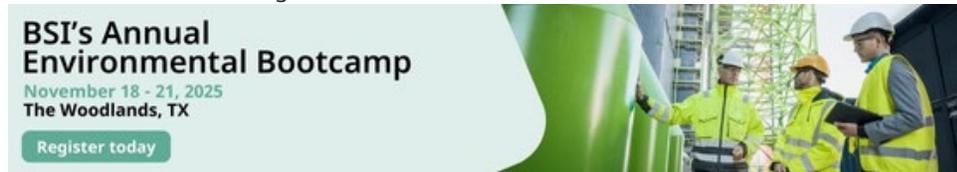
Consulting Technician, BSI Consulting

T: 512.657.2848

[Loren.Ladd@bsigroup.com](mailto:Loren.Ladd@bsigroup.com)

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

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



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**From:** [eNotice TCEQ](#)  
**To:** [kevin.sparks@senate.texas.gov](mailto:kevin.sparks@senate.texas.gov); [Tom.craddick@house.texas.gov](mailto:Tom.craddick@house.texas.gov)  
**Subject:** TCEQ Notice - Permit Number O4463  
**Date:** Thursday, May 8, 2025 7:07:31 PM  
**Attachments:** [TCEQ Notice - O4463 38117.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](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*

May 8, 2025

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

Re: Accepted Federal Operating Permit Significant Revision Application  
Project Number: 38117  
Permit Number: O4463  
Conduit Tollco, LLC  
Sunbridge Facility  
Tarzan, Martin County  
Regulated Entity Number: RN111718532  
Customer Reference Number: CN606129708

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=-102.077222,32.227222&level=13>.

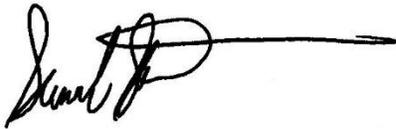
The FOP program regulates both new and existing major sources of emissions. The goal of the program is to improve air quality in Texas through increased compliance by codifying existing applicable regulatory requirements into the FOP. The FOP provides the applicant authorization to operate the equipment 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  
May 8, 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*

May 8, 2025

THE HONORABLE TOM CRADDICK  
TEXAS HOUSE OF REPRESENTATIVES  
PO BOX 2910  
AUSTIN TX 78768-2910

Re: Accepted Federal Operating Permit Significant Revision Application  
Project Number: 38117  
Permit Number: O4463  
Conduit Tollco, LLC  
Sunbridge Facility  
Tarzan, Martin County  
Regulated Entity Number: RN111718532  
Customer Reference Number: CN606129708

Dear Representative Craddick:

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=-102.077222,32.227222&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", with a long horizontal line extending to the right.

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

## Texas Commission on Environmental Quality

Title V Existing

4463

### Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	SUNBRIDGE FACILITY
County	MARTIN
Latitude (N) (##.#####)	32.227222
Longitude (W) (-###.#####)	102.077222
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)?	RN111718532
What is the name of the Regulated Entity (RE)?	CONDUIT TOLLCO SUNBRIDGE FACILITY
Does the RE site have a physical address?	Yes
Physical Address	
Number and Street	2045 COUNTY ROAD 3200
City	TARZAN
State	TX
ZIP	79783
County	MARTIN
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)?	CN606129708
Type of Customer	Partnership
Full legal name of the applicant:	

Legal Name	Conduit Tollco, LLC
Texas SOS Filing Number	804976989
Federal Tax ID	922489981
State Franchise Tax ID	32088912657
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	CONDUIT TOLLCO LLC
Prefix	MR
First	MATTHEW
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.

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

CONDUIT TOLLCO LLC

MS

Darla

Kuntz

HES Manager

Responsible Official Contact Address

Domestic

820 GESSNER RD STE 895

HOUSTON

TX

77024

2816353409

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

New Contact

CONDUIT TOLLCO LLC

MS

Darla

Kuntz

Title	HES 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:	32 Deg 13 Min 38 Sec
3) Permit Longitude Coordinate:	102 Deg 4 Min 38 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	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.

[File Properties]

File Name

<a href=/ePermitsExternal/faces/file?fileId=255072>1353966  
Conduit TollCo Sunbridge Title V Revision Application  
032525.pdf</a>

Hash

5040EF74776EB5FDA79C279E2309CA4EB5A2492B0D4F3798C9DB0461CB33FC5F

MIME-Type

application/pdf

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

## Expedite Title V

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

No

## Certification

I certify that I am the 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 4463.
9. My signature indicates that I am in agreement with the information on this form, and authorize its submittal to the TCEQ.

OWNER OPERATOR Signature: Darla K Kuntz OWNER OPERATOR

Account Number:	ER106444
Signature IP Address:	47.44.198.122
Signature Date:	2025-05-04
Signature Hash:	657B1E891BA8F70E49E498A7849CF8570E3F6CBC1962D0F62A3B946EC4FB675C
Form Hash Code at time of Signature:	6F6CC5BE70BCBE65707CCB7964E159A232473419179F0526769FAA4A26F11AF6

## Submission

Reference Number:	The application reference number is 769386
Submitted by:	The application was submitted by ER106444/Darla K Kuntz
Submitted Timestamp:	The application was submitted on 2025-05-04 at 11:17:10 CDT
Submitted From:	The application was submitted from IP address 47.44.198.122
Confirmation Number:	The confirmation number is 650738
Steers Version:	The STEERS version is 6.91
Permit Number:	The permit number is 4463

## Additional Information

Application Creator: This account was created by Zihui Qiu



March 25, 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: Conduit TollCo, LLC - Sunbridge Facility**  
**2045 County Road 3200**  
**Tarzan, Texas**  
**Title V Permit No. O4463**  
**RN Number: RN111718532**  
**CN Number: CN606129708**

**Title V Permit No. O4463 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. O4463 for the electric generating units (EGUs) located at the Conduit TollCo, LLC, (Conduit) Sunbridge Facility (Facility).

The manufacturer of the EGUs 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, only two EGUs (Unit ID Nos. EGU1 and EGU2) have been installed and are currently operating. Therefore, the OP-ACPS form included with this revision application does not include Unit ID Nos. EGU3 and EGU4 since there are no noncompliance situations to report for those units.

Should there be any questions regarding the application, please contact Ryan Pickett at 512.202.9629 or at [ryan.pickett@bsigroup.com](mailto:ryan.pickett@bsigroup.com).

Regards,

*Alice Tabor*

Alice Tabor  
Associate Consultant

Reviewed by:

*Ryan Pickett*

Ryan Pickett  
Senior Consultant, Manager

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

Attachments

OP-2  
OP-CRO1  
OP-DEL  
OP-UA2  
OP-ACPS

## Attachments

---

[OP-2](#)

[OP-CRO1](#)

[OP-DEL](#)

[OP-UA2](#)

[OP-ACPS](#)

**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.: O4463	
Regulated Entity No.: RN111718532	
Company Name: Conduit TollCo, LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA? <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
<b>I. Application Type</b>	
Indicate the type of application:	
<input type="checkbox"/> Renewal	
<input type="checkbox"/> Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
<input checked="" type="checkbox"/> Significant Revision	
<input type="checkbox"/> Revision Requesting Prior Approval	
<input type="checkbox"/> Administrative Revision	
<input type="checkbox"/> Response to Reopening	
<b>II. Qualification Statement</b>	
For SOP Revisions Only <span style="float: right;"><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</span>	
For GOP Revisions Only <span style="float: right;"><input type="checkbox"/> YES <input type="checkbox"/> NO</span>	

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

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

Indicate all pollutants for which the site is a major source based on the site's potential to emit:  
(Check the appropriate box[es].)

VOC       NO<sub>x</sub>       SO<sub>2</sub>       PM<sub>10</sub>       CO       Pb       HAP

Other:

**IV. Reference Only Requirements (For reference only)**

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

**V. Delinquent Fees and Penalties**

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

**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.: O4463
Regulated Entity No.: RN111718532
Company Name: Conduit TollCo, LLC

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

Revision No.	Revision Code	New Unit	Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
			ID No.	Applicable Form		
1	SIG-A	NO	EGU1	OP-UA2	172516	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	172516	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	172516	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	172516	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)

**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.: O4463	
Regulated Entity No.: RN111718532	
Company Name: Conduit TollCo, LLC	
<b>I. Significant Revision</b> <i>(Complete this section if you are submitting a significant revision application or a renewal application that includes a significant revision.)</i>	
A. Is the site subject to bilingual requirements pursuant to 30 TAC § 122.322?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> 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?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> 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:

<b>Pollutant</b>	<b>Description of the Change in Pollutant Emissions</b>
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.

<b>I. Identifying Information</b>	
RN: RN111718532	
CN: CN606129708	
Account No.:	
Permit No.: O4463	
Project No.: TBA	
Area Name: Conduit Tollco Sunbridge Facility	
Company Name: Conduit Tollco LLC	
<b>II. Certification Type</b> <i>(Please mark appropriate box)</i>	
<input type="checkbox"/> Responsible Official Representative	<input checked="" type="checkbox"/> Duly Authorized Representative
<b>III. Submittal Type</b> <i>(Please mark appropriate box) (Only one response can be accepted per form)</i>	
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input checked="" type="checkbox"/> Permit Revision, Renewal, or Reopening
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application
<input type="checkbox"/> Other: _____	

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

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.

<b>IV. Certification of Truth</b>
<b>This certification does not extend to information which is designated by TCEQ as information for reference only.</b>
<p>I, <u>Darla Kuntz</u> certify that I am the <u>Duly Authorized Representative (DAR)</u></p> <p style="text-align: center;"><i>(Certifier Name printed or typed)</i> <span style="float: right;"><i>(RO or DAR)</i></span></p> <p>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></p>
<p>Time Period: From <u>3/24/2025</u> to _____</p> <p style="text-align: center;"><i>(Start Date)</i> <span style="float: right;"><i>(End Date)</i></span></p>
<p>Specific Dates: _____</p> <p style="text-align: center;"><i>(Date 1)</i> <span style="margin-left: 100px;"><i>(Date 2)</i></span> <span style="margin-left: 100px;"><i>(Date 3)</i></span> <span style="margin-left: 100px;"><i>(Date 4)</i></span></p>
<p>_____</p> <p style="text-align: center;"><i>(Date 5)</i> <span style="margin-left: 100px;"><i>(Date 6)</i></span></p>
<p>Signature: _____ Signature Date: _____ Title: _____</p>
<p>Title: _____</p>

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

<b>I. Identifying Information</b>
Account Number:
Regulated Entity Number: RN111718532
Customer Reference Number: CN606129708
Permit Number: O4463
Area Name: Sunbridge Facility
Company Name: Conduit TollCo, LLC
<b>II. Duly Authorized Representative Information</b>
Action Type:
<input checked="" type="checkbox"/> New DAR Identification
<input type="checkbox"/> Administrative Information Change
Conventional Title:
<input type="checkbox"/> Mr.
<input type="checkbox"/> Mrs.
<input checked="" type="checkbox"/> Ms.
<input type="checkbox"/> Dr.
Name (Driver License/STEERS): Darla Kuntz
Title: HSE Manager
Delegation Effective Date: 3/24/2025
Telephone Number: 281-635-3409
Fax Number:
Company Name: Conduit TollCo, 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)*

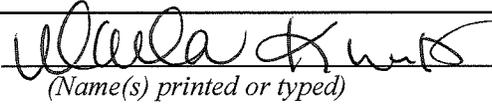
Responsible Official Signature: \_\_\_\_\_



Date: \_\_\_\_\_

03/24/2025

Duly Authorized Representative Signature: \_\_\_\_\_



*(Name(s) printed or typed)*

Date: \_\_\_\_\_

03/24/2025

**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: \_\_\_\_\_

**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	O4463	RN111718532

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

**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	O4463	RN111718532

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		

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

<b>Date:</b> 03/24/2025	<b>Regulated Entity No.:</b> RN111718532	<b>Permit No.:</b> O4463
<b>Company Name:</b> Conduit TollCo, LLC		<b>Area Name:</b> Sunbridge 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**

<b>A. Compliance Plan — Future Activity Committal Statement</b>	
<p>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.</p>	
<b>B. Compliance Certification - Statement for Units in Compliance*</b> (Indicate response by entering an "X" in the appropriate column)	
<b>1.</b> 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?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>2.</b> Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
<b>3.</b> 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
<p>* <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.</i></p> <p><i>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.</i></p>	

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

<b>Date:</b> 03/24/2025	<b>Regulated Entity No.:</b> RN111718532	<b>Permit No.:</b> O4463
<b>Company Name:</b> Conduit TollCo, LLC		<b>Area Name:</b> Sunbridge Facility

**Part 2**

<b>A. Compliance Schedule</b>		
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.		
<b>1. Specific Non-Compliance Situation</b>		
Unit/Group/Process ID No.(s): EGU1, EGU2		
SOP Index No.: 60JJJJ		
Pollutant: NO <sub>x</sub>		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
§ 60.4243(b)(2)(ii)	Conduct an initial performance test	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
§ 60.4243(b)(2)(ii)	Stack test results	HSE Manager's Office in Houston
<b>3. Non-compliance Situation Description</b>		
Initial performance testing was not completed within 180 days of the initial startup of the engines.		
<b>4. Corrective Action Plan Description</b>		
Conduct initial performance testing		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
Schedule initial performance testing.		
Conduct initial performance testing.		
Submit report for initial performance testing.		

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

<b>Date:</b> 03/24/2025	<b>Regulated Entity No.:</b> RN111718532	<b>Permit No.:</b> O4463
<b>Company Name:</b> Conduit TollCo, LLC		<b>Area Name:</b> Sunbridge Facility

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
N/A	N/A
<b>7. Progress Report Submission Schedule</b>	
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**

<b>Date:</b> 03/24/2025	<b>Regulated Entity No.:</b> RN111718532	<b>Permit No.:</b> O4463
<b>Company Name:</b> Conduit TollCo, LLC		<b>Area Name:</b> Sunbridge Facility

**Part 2**

<b>A. Compliance Schedule</b>		
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.		
<b>1. Specific Non-Compliance Situation</b>		
Unit/Group/Process ID No.(s): EGU1, EGU2		
SOP Index No.: 60JJJJ		
Pollutant: CO		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
§ 60.4243(b)(2)(ii)	Conduct an initial performance test	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
§ 60.4243(b)(2)(ii)	Stack test results	HSE Manager's Office in Houston
<b>3. Non-compliance Situation Description</b>		
Initial performance testing was not completed within 180 days of the initial startup of the engines.		
<b>4. Corrective Action Plan Description</b>		
Conduct initial performance testing		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
Schedule initial performance testing.		
Conduct initial performance testing.		
Submit report for initial performance testing.		

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

<b>Date:</b> 03/24/2025	<b>Regulated Entity No.:</b> RN111718532	<b>Permit No.:</b> O4463
<b>Company Name:</b> Conduit TollCo, LLC		<b>Area Name:</b> Sunbridge Facility

**Part 2 (continued)**

<b>6. Previously Submitted Compliance Plan(s)</b>	
<b>Type of Action</b>	<b>Date Submitted</b>
N/A	N/A
<b>7. Progress Report Submission Schedule</b>	
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**

<b>Date:</b> 03/24/2025	<b>Regulated Entity No.:</b> RN111718532	<b>Permit No.:</b> O4463
<b>Company Name:</b> Conduit TollCo, LLC		<b>Area Name:</b> Sunbridge Facility

**Part 2**

<b>A. Compliance Schedule</b>		
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.		
<b>1. Specific Non-Compliance Situation</b>		
Unit/Group/Process ID No.(s): EGU1, EGU2		
SOP Index No.: 60JJJJ		
Pollutant: VOC		
<b>Applicable Requirement</b>		
<b>Citation</b>	<b>Text Description</b>	
§ 60.4243(b)(2)(ii)	Conduct an initial performance test	
<b>2. Compliance Status Assessment Method and Records Location</b>		
<b>Citation</b>	<b>Text Description</b>	<b>Location of Records/Documentation</b>
§ 60.4243(b)(2)(ii)	Stack test results	HSE Manager's Office in Houston
<b>3. Non-compliance Situation Description</b>		
Initial performance testing was not completed within 180 days of the initial startup of the engines.		
<b>4. Corrective Action Plan Description</b>		
Conduct initial performance testing		
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>		
Schedule initial performance testing.		
Conduct initial performance testing.		
Submit report for initial performance testing.		

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

<b>Date:</b> 03/24/2025	<b>Regulated Entity No.:</b> RN111718532	<b>Permit No.:</b> O4463
<b>Company Name:</b> Conduit TollCo, LLC		<b>Area Name:</b> Sunbridge Facility

**Part 2 (continued)**

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