Carolyn Thomas

From: Carolyn Thomas
Sent: Tuesday, September 23, 2025 1:14 PM
To: 'chris.thompson@energytransfer.com'; Crawford, Michael Bradley; Miro, Alena M.
Subject: ET Gathering & Processing LLC

We have received your application for the above referenced facility and it is currently under review. The following item(s) are required before we can declare the application administratively complete:

- TCEQ is in receicpt of a streamline revision project for Title V Permit 3186, The COR list Christopher Thompson as Responsible. Hoever the TV database list Toby Clark.

Please send form CRO2 to my attention to update the Responsible Official.

Thank you,
Carolyn Thomas
Air Permits Initial Review Team
Air Permits Division, MC 161
Office of Air Texas Commission on Environmental Quality
Phone: (512) 239-5127
Fax: (512) 233-0973
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Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program

Date:	**9/15/2025**
Permit No.:	**O3186**
Regulated Entity No.:	**RN100215532**

Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed/Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
MIVIDA-FUG	60OOOOb-0001	EU				Fugitive monitoring requirements associated with NSPS OOOOb for which a unit attribute form and applicability flowchart has not yet been created. All applicable citations are included on Form OP-REQ3.

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
9/15/2025	O3186	RN100215532

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	MIVIDA-FUG	OP-UA1	Site Fugitives		113099	
	2	MIVIDA-FUG	OP-UA1	Site Fugitives		113099	
	3	MIVIDAFUG2	OP-UA12	Site Fugitives		113099	

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

Table 1a: Additions

Date: 9/15/2025	**Regulated Entity No.:** RN100215532	**Permit No.:** O3186
Company Name: ET Gathering & Processing LLC	**Area Name:** Mi Vida Treater Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	MIVIDA-FUG	OP-UA1	60OOOOb-0001	VOC	40 CFR Part 60, Subpart OOOOb	§60.5370b(a)(4) §60.5370b(b) §60.5400b(a) §60.5400b(b) §60.5400b(c) §60.5400b(d) §60.5400b(e) §60.5400b(f) §60.5400b(g) §60.5400b(h) §60.5400b(i) §60.5400b(j) §60.5410b(h) §60.5411b(a)(2) §60.5411b(a)(3) §60.5411b(a)(4) §60.5411b(c) §60.5412b(a)(3) §60.5412b(b) §60.5415b(f)(1)(i) §60.5415b(f)(1)(ii) §60.5415b(f)(1)(iii)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§60.5415b(f)(1)(iv) §60.5415b(f)(1)(v) §60.5415b(f)(1)(vi) §60.5415b(f)(1)(vii)(A) §60.5415b(f)(1)(vii)(B) §60.5415b(f)(1)(x) §60.5415b(j)

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

Table 1b: Additions

Date: 9/15/2025	**Regulated Entity No.:** RN100215532	**Permit No.:** O3186
Company Name: ET Gathering & Processing LLC	**Area Name:** Mi Vida Treater Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	MIVIDA-FUG	60OOOOb-0001	VOC	§60.5400b(b) §60.5400b(c) §60.5400b(d) §60.5400b(e) §60.5400b(g) §60.5400b(h) §60.5410b(h)(1) §60.5410b(h)(2) §60.5410b(h)(3) §60.5410b(h)(4) §60.5410b(h)(5) §60.5410b(h)(6) §60.5410b(h)(7) §60.5410b(h)(8) §60.5410b(h)(9) §60.5410b(h)(10) §60.5410b(h)(12) §60.5415b(f)(1)(x) §60.5415b(j)(1) §60.5415b(j)(2)	§60.5400b(l) §60.5410b(h)(11)(vi) §60.5410b(h)(15) §60.5411b(c) §60.5415b(j)(15) §60.5416b(b)(9) §60.5420b(c)(8)(i) §60.5420b(c)(8)(ii) §60.5420b(c)(8)(iii) §60.5420b(c)(8)(iv) §60.5420b(c)(10) §60.5420b(c)(11)(ii) §60.5420b(c)(11)(iv) §60.5420b(c)(11)(v) §60.5420b(c)(11)(vi) §60.5420b(c)(11)(vii) §60.5420b(c)(11)(viii) §60.5420b(c)(12) §60.5420b(c)(13) §60.5421b(a)	§60.7(a)(1) §60.7(a)(3) §60.7(a)(4) §60.15(d) §60.5400b(k) §60.5410b(h)(13) §60.5410b(h)(14) §60.5415b(j)(14) §60.5417b(j) §60.5420b(a)(1) §60.5420b(b)(1) §60.5420b(b)(11)(i) §60.5420b(b)(11)(ii) §60.5420b(b)(11)(iii) §60.5420b(b)(11)(iv) §60.5420b(b)(11)(v)(A) §60.5420b(b)(11)(i)(B) §60.5420b(b)(11)(i)(C) §60.5420b(b)(11)(i)(D) §60.5420b(b)(11)(i)(E)

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
				§60.5415b(j)(3) §60.5415b(j)(4) §60.5415b(j)(11) §60.5415b(j)(12) §60.5415b(j)(13) §60.5415b(j)(13) §60.5416b(a)(1) §60.5416b(a)(2) §60.5416b(a)(4) §60.5416b(b)(1)(ii) §60.5416b(b)(2) §60.5416b(b)(3) §60.5416b(b)(5) §60.5416b(b)(6) §60.5416b(b)(7) §60.5416b(b)(8) §60.5417b(a) §60.5417b(c) §60.5417b(d)(8) §60.5417b(e)(2) §60.5417b(e)(4) §60.5417b(e)(5) §60.5417b(g)(1) §60.5417b(g)(4) §60.5417b(g)(5) §60.5417b(g)(7) §60.5417b(h)	§60.5421b(b)	§60.5420b(b)(11)(i)(F) §60.5420b(b)(11)(i)(G) §60.5420b(b)(11)(i)(H) §60.5420b(b)(11)(i)(I) §60.5420b(b)(11)(i)(J) §60.5420b(b)(11)(i)(K) §60.5420b(b)(11)(i)(L) §60.5420b(b)(12) §60.5420b(b)(13) §60.5420b(b)(15) §60.5420b(d) §60.5420b(e) §60.5420b(f) §60.5422b(a) §60.5422b(b) §60.5422b(c)

Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program

Table 2a: Deletions

Date: 9/15/2025	**Regulated Entity No.:** RN100215532	**Permit No.:** O3186
Company Name: ET Gathering & Processing LLC	**Area Name:** Mi Vida Treater Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	MIVIDA-FUG	OP-UA12	60OOOO-0002	VOC	40 CFR Part 60, Subpart OOOO	**Pressure relief device in gas/vapor service:** § 60.5400(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-4a(a) § 60.482-4a(b)(1) § 60.482-4a(b)(2) § 60.482-4a(c) § 60.482-4a(d)(1) § 60.482-4a(d)(2) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5401(b)(1)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§ 60.5401(b)(2) § 60.5401(b)(3)(i) § 60.5401(b)(3)(ii) § 60.5401(b)(4)(i) § 60.5401(b)(4)(ii) § 60.5410(f) § 60.5420(a)(1) § 60.5422(b) **Valves**: § 60.5400(b) § 60.483-1a(a) § 60.483-1a(b) § 60.483-1a(b)(3) § 60.483-1a(c) § 60.483-1a(c)(2) § 60.483-1a(c)(3) § 60.483-1a(d) § 60.483-2a(a)(1) § 60.483-2a(b)(1) § 60.483-2a(b)(2) § 60.483-2a(b)(3) § 60.483-2a(b)(4) § 60.483-2a(b)(5) § 60.485a(b) [G]§ 60.485a(h) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Closed vent systems leaks:** § 60.5400(a)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§ 60.482-10a(a) [G]§ 60.482-10a(f) [G]§ 60.482-10a(g) § 60.482-10a(h) § 60.482-10a(i) [G]§ 60.482-10a(j) [G]§ 60.482-10a(k) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Connectors in gas and vapor and light liquid service:** § 60.5400(a) § 60.482-11a(b)(2) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(i) § 60.482-11a(d) [G]§ 60.482-11a(e) [G]§ 60.482-11a(f)(1) § 60.482-11a(f)(2) § 60.482-11a(g) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.486a(a)(1)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§ 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Flares:** § 60.5400(a) § 60.18(b) § 60.482-10a(a) § 60.482-10a(d) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Valves in gas/vapor service:** § 60.5400(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-7a(a)(1) [G]§ 60.482-7a(a)(2) § 60.482-7a(b)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						[G]§ 60.482-7a(c) [G]§ 60.482-7a(d) [G]§ 60.482-7a(e) [G]§ 60.482-7a(f) [G]§ 60.482-7a(g) [G]§ 60.482-7a(h) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Pumps in light liquid service:** § 60.5400(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-2a(a)(1) § 60.482-2a(a)(2) § 60.482-2a(b)(1) § 60.482-2a(b)(1)(i) § 60.482-2a(b)(1)(ii) § 60.482-2a(b)(2) § 60.482-2a(b)(2)(ii) § 60.482-2a(c)(1) [G]§ 60.482-2a(c)(2) § 60.482-2a(d) [G]§ 60.482-2a(d)(1) § 60.482-2a(d)(2)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§ 60.482-2a(d)(3) [G]§ 60.482-2a(d)(6) [G]§ 60.482-2a(e) § 60.482-2a(f) [G]§ 60.482-2a(g) § 60.482-2a(h) § 60.482-9a(a) § 60.482-9a(b) [G]§ 60.482-9a(d) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1)

Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program

Table 2b: Deletions

Date: 9/15/2025	**Regulated Entity No.:** RN100215532	**Permit No.:** O3186
Company Name: ET Gathering & Processing LLC	**Area Name:** Mi Vida Treater Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	MIVIDA-FUG	OP-UA12	60OOOO-0002	VOC	**Pressure relief device in gas/vapor service:** § 60.482-4a(b)(2) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401(b)(1) § 60.5401(g) **Valves:** § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.483-1a(b)(2) § 60.483-1a(c)(1) § 60.483-2a(b)(7)	**Pressure relief device in gas/vapor service:** § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(10) § 60.486a(e)(3) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.5420(c) [G]§ 60.5421(b) **Valves:** § 60.483-2a(b)(6) § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) [G]§ 60.486a(g)	**Pressure relief device in gas/vapor service:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) § 60.5422(b) [G]§ 60.5422(c) **Valves:** § 60.483-1a(b)(1) § 60.483-1a(b)(2) § 60.487a(a) § 60.487a(b)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401(f) § 60.5401(g) **Closed vent systems leaks:** § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401(g) **Connectors in gas and vapor and light liquid service:** § 60.482-11a(a) § 60.482-11a(b) § 60.482-11a(b)(1) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(ii) [G]§ 60.482-11a(b)(3)(iii) § 60.482-11a(b)(3)(iv) § 60.482-11a(c) § 60.482-9a(a)	**Closed vent systems leaks:** [G]§ 60.482-10a(l) § 60.485a(b)(2) [G]§ 60.486a(d) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.5420(c) **Connectors in gas and vapor and light liquid service:** § 60.482-11a(b)(3)(v) § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.486a(e)(9) § 60.486a(f) § 60.486a(f)(1) § 60.5420(c) **Flares:** § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.5420(c) **Valves in gas/vapor service:**	§ 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(i) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(d) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Closed vent systems leaks:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Connectors in gas and vapor and light liquid service:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(5)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401(f) § 60.5401(g) **Flares:** § 60.482-10a(e) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(g) § 60.5401(g) **Valves in gas/vapor service:** § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e)	§ 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) § 60.486a(f)(2) § 60.5420(c) **Pumps in light liquid service:** § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) § 60.486a(e)(7) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) [G]§ 60.486a(h) § 60.5420(c)	§ 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(vii) § 60.487a(c)(2)(viii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Flares:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Valves in gas/vapor service:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(2) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					[G]§ 60.5401(f) § 60.5401(g) **Pumps in light liquid service:** § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-2a(b)(2)(i) [G]§ 60.482-2a(d)(4) [G]§ 60.482-2a(d)(5) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401(f) § 60.5401(g)		§ 60.487a(c)(2)(i) § 60.487a(c)(2)(ii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Pumps in light liquid service:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(3) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(iii) § 60.487a(c)(2)(iv) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1)

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

Date: 9/15/2025	
Permit No.: O3186	
Regulated Entity No.: RN100215532	
Company Name: ET Gathering & Processing LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☒ NO

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

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*						
☒ VOC	☒ NO_X	☒ SO_2	☐ PM_{10}	☐ 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: 9/15/2025
Permit No.: O3186
Regulated Entity No.: RN100215532
Company Name: ET Gathering & Processing LLC

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

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	ADMIN-G	No	MIVIDA-FUG	OP-UA1	113099	To incorporate the Alternate Means of Compliance for fugitive monitoring methods. Provisional requirements: AMOC.
2	MS-C	No	MIVIDA-FUG	OP-UA1	113099	Change in the fugitive monitoring method from NSPS OOOO Method 21 under 60.5400 to NSPS OOOOb optical gas imaging (OGI) under 60.5400b and Appendix K. The monitoring frequency will not change as part of the revision. Provisional requirements: OP-REQ3.
3	MS-C	No	MIVIDAFUG2	OP-UA12	113099	Delete MIVIDAFUG2 ID and associated regulatory applicability for NSPS OOOOa

ENERGY TRANSFER

September 15, 2025

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

RE: Minor Revision Application for SOP No. O3186
ET Gathering & Processing LLC (CN606187110)
Mi Vida Treater Plant (RN100215532)

Dear Sir or Madam,

ET Gathering & Processing LLC is submitting the attached minor revision application to revise Site Operating Permit (SOP) O3186 for the Mi Vida Treater Plant.

If you have any comments or questions, please contact me at (713) 865-6825 or alena.miro@energytransfer.com.

Sincerely,

Alena Miro
Sr. Manager, Environmental

cc: Environmental Protection Agency, Region 6
Air Permits Section
1201 Elm Street, Suite 500
Dallas, TX 75270-2102
Via Email: R6AirPermits@EPA.gov

TCEQ Region 7
Attention: Air Section Manager
ClayDesta Plaza
10 Desta Drive Suite 350E
Midland, TX 79705-3734
Via Email: TCEQR7@tceq.texas.gov

Federal Operating Permit Minor Revision Application

SOP Permit Number O3186

Mi Vida Treater Plant

Ward County, Texas

September 2025

PREPARED FOR:

ET Gathering & Processing LLC

Houston, Texas

TCEQ PROJECT: TBD

SPIRIT PROJECT: PROJ-058786

FOR SPIRIT ENVIRONMENTAL:

Kaylon Gilbert W. Scott Hyden

OFFICE: 281-664-2490
FAX: 281-664-2491

20465 State Highway 249, Suite 300
Houston, TX 77070

spiritenv.com

Table of Contents

1.0 Introduction

ET Gathering & Processing LLC (Energy Transfer) (CN606187110) is submitting a Federal Operating Permit (FOP) application for the Mi Vida Treater Plant (Mi Vida TP) (RN100215532) to revise the Title V Site Operating Permit (SOP) Number (No.) O3186. Mi Vida TP is located in Ward County, which is classified as an attainment county for all criteria pollutants.

The purpose of this minor revision is to incorporate the Alternate Means of Compliance (AMOC) No. 218 for fugitive monitoring methods as well as change the fugitive regulatory applicability from New Source Performance Standard (NSPS) Subparts OOOO and OOOOa to Subpart OOOOb to align with the AMOC and create a single set of fugitive regulatory standards and Optical Gas Imaging (OGI) monitoring methods for the site.

Section 2.0 contains a process description for the site. Section 3.0 contains all required Texas Commission on Environmental Quality (TCEQ) forms for the application.

1.1 Facility Contact Information

Registrant:	ET Gathering & Processing LLC 1300 Main Street Houston, TX 77002
Regulated Entity Number:	RN100215532
Customer Reference Number:	CN606187110
Facility Operations:	Mi Vida Treater Plant
SOP Number:	O3186
Nearest City:	Barstow, TX
County:	Ward
Responsible Official:	Name: Chris Thompson Title: Vice President Operations Company: Energy Transfer LP Address: 1706 S. Midkiff Road Midland, TX 79701 Phone: (432) 638-2042 Email: chris.thompson@energytransfer.com
Duly Authorized Representative	Name: Michael Crawford Title: Director of Operations Company: Energy Transfer LP Address: 1706 S. Midkiff Road Midland, TX 79701 Phone: (432) 438-2509 Email: michael.crawford@energytransfer.com
Technical Contact Information:	Name: Alena Miro Title: Sr. Manager - Environmental Company: Energy Transfer LP Address: 2564 Pecos Highway Carlsbad, NM 88220 Phone: (713) 865-6825 Email: alena.miro@energytransfer.com

1.2 Federal Attainment/Major Source Status

Company Name	ET Gathering & Processing LLC				
Facility Name	Mi Vida Treater Plant				
County	Ward				
NAAQS Pollutant	**Nonattainment Status of the County**	**Federal Clean Air Act Title V**		**Prevention of Significant Deterioration (PSD)**	
		30 TAC §122.10(13) Major Source Threshold (tpy)	**Major or Minor?**	**40 CFR §52.21(b)(1)(i) Major Source Threshold (tpy)**	**Major or Minor?**
VOC	Attainment	100	Major	250	Minor
NO_X	Attainment	100	Major	250	Minor
CO	Attainment	100	Major	250	Minor
PM	Attainment	100	Minor	250	Minor
SO_2	Attainment	100	Major	250	Minor
Lead	Attainment	100	Minor	250	Minor
Single HAP	--	10	Minor	--	--
Aggregate	--	25	Minor	--	--
Any other	Attainment	100	None	250	None
Title V Federal Operating Permit Required?			**Yes**		
Title V Federal Operating Permit Number			**O3186**		
PSD Permit Required?				**No**	
PSD Permit Number				**N/A**	

1.3 Current Authorizations

Presently, emissions resulting from the site's operations are authorized by Standard Permit (SP) Permit No. 113099 and unregistered Permit By Rule (PBR) 30 TAC §106.359.

2.0 Process Description

The Mi Vida TP is a natural gas processing plant (SIC 1321). The following paragraphs describe emission sources and processes at this site.

The Mi Vida TP is designed with many bypass and interconnecting lines so that inlet streams can be routed through and/or around various equipment and processes as needed to meet specs. To avoid confusion, the following paragraphs present a description of the Mi Vida TP's equipment and processes as they are primarily designed, rather than addressing every possible path. The primary design represents the Mi Vida TP operating at full capacity, with all equipment being utilized.

The Mi Vida TP receives wet natural gas from pipelines gathered from wellheads in the area. The inlet gas streams enter inlet slug catchers where liquids are removed. The liquids from one (1) slug catcher are sent through a 3-phase separator/high-pressure flash tank where water is removed and sent to a flare knockout drum. The condensate liquids from the separator are sent through a low-pressure flash tank and then stabilized to approximately nine (9) pounds per square inch (psi) via the use of a stabilization unit including a heat medium heater (FIN STAB-HTR2). Liquids from a second slug catcher are sent to another low-pressure flash tank and stabilized to approximately nine (9) psi in a second stabilization unit including a heat medium heater (FIN STAB-HTR3). The stabilized liquids may be sent through an additional stabilization unit and separated into Y-grade product and bottoms product. An additional stabilizer heater (FIN STAB-HTR) supplies heat for this stabilizer. The bottoms product and/or stabilized condensate is stored in eleven (11) 500- barrel (bbl) condensate tanks (FINs CND-TNK1 through CND-TNK7 and CND-TNK11 through CND-TNK14) and periodically transported off-site via tank trucks. The loading operations (FINs LOAD3 and LOAD4) are controlled by the truck loading flare (FIN FLARE-2).

Electric overhead compressors operate in tandem to route vapors from the inlet separators/flash tanks and first stabilization unit to the gas processing train. When one (1) of the compressors goes down, either for maintenance or due to an upset condition, the Mi Vida TP throughput is reduced so the overhead vapors can be controlled by the remaining unit. Any excess vapors produced during transition to single-compressor operation are combusted in the stabilizer flare (FIN FLARE-3).

Vapors from the second stabilization system are routed through two (2) of three (3) 1,380-horsepower (hp) Caterpillar G3516B flash gas compressors (FINs C-11, C-12, and C-13). These compressors act in the same manner as the electric overhead compressors for the first stabilization unit, with any excess vapors produced during transitions between operating compressors being combusted in the stabilizer flare. As part of this project, a portion of the normal operation vapors from both stabilizer units are authorized to be combusted in the stabilizer flare (FIN FLARE-3) at all times.

Water (with small amounts of entrained condensate) separated from the inlet condensate is routed through a flare knockout drum to a 1,000-bbl gun barrel vessel (FIN GBRL-TNK9). The gun barrel also receives liquids from various ground and low-pressure sumps. The small amounts of entrained condensate from the gun barrel and any off-spec condensate are sent to a 500-bbl tank (FIN SLOP-TNK8) and trucked out (FIN LOAD2). The slop loading vapors are sent to the truck loading flare. The water from the gun barrel is routed to a 500-bbl water storage tank (FIN PW-TNK10) and trucked out as needed (FIN LOAD1). The fourteen (14) atmospheric hydrocarbon storage tanks are controlled by a vapor recovery unit (VRU) which is powered by an electric motor. The captured vapors are routed by pipeline to the low-pressure gathering system. When the VRU is down for maintenance, the vapors are routed to the truck loading flare for combustion.

The gas from one (1) inlet slug catcher is compressed by one (1) 1,380-hp Caterpillar G3516B LE engine-driven compressor (FIN C-14) and three (3) 1,300-hp Solar Saturn turbine-driven compressors (FINs 3180, 3182, and 3184) prior to entering the processing train. Gas from the second inlet slug catcher passes through an inlet scrubber directly to the processing train. A bypass stream of inlet gas is sent through a series of knockout vessels and routed out of the Mi Vida TP by pipeline.

The processing train includes an amine unit (FIN MDEA-STILL2), a triethylene glycol (TEG) dehydration unit (FIN DEHY-STILL2), a molecular sieve regenerator with a regeneration heater (FIN REGEN-HTR), and an HMO heater (FIN DMHTR). After sweetening and dehydration, the treated gas is sent to the cryogenic unit. Residue gas from the cryogenic unit is recompressed before being discharged to the sales line. The recompression equipment includes four (4) 4,735-hp Caterpillar G3616 engine-driven dual drive compressors (FINs C-6, C-7, C-8, and C-9).

Vapors produced as flash emissions in the amine system flash tank (FIN MDEA-FLTK) are used as fuel in the amine reboilers (FINs AMINE-3A and AMINE-3B). When the reboilers are cycled off, flash tank vapors are combusted by the main plant flare (FIN FLARE-1). Acid gases removed from the inlet gas stream in the amine contactor are combusted by the acid gas flare (FIN AGFLARE).

Hydrocarbon vapors from the TEG dehydration unit still vent are routed to a condenser for HAP reduction. Non-condensable vapors from the condenser are captured by a VRU driven by electric motors and routed to the main plant flare for combustion. When the VRU is down for maintenance, these vapors vent to the atmosphere. The dehydration system's flash tank off-gases (FIN DEHYFLTK)

are used as fuel in the glycol reboiler (FIN TEG-HTR). When the reboiler is cycled off, flash tank vapors are combusted by the main plant flare. There are also various fixed roof tanks for the storage of chemicals used in site operations and maintenance, including diesel fuel (FIN TK-3512), unleaded gasoline (FIN TK-3511), antifreeze (FINs TK-9410, TK-9413, and TK-9414), MDEA (FIN TK-9401), TEG (FIN TK-9408), and lube oil (FINs TK-9409, TK-9411, and TK-9412). Piping components are a source of fugitive emissions (FIN MIVIDAFUG).

3.0 SOP Forms, AMOC

Section 3.0 includes all forms necessary to revise the existing SOP No. O3186. The following list outlines the included forms.

- OP-2, Application for Permit Revision
- OP-UA1, Miscellaneous and Generic Unit Attributes
- OP-REQ3, Applicable Requirements Summary
- OP-SUMR, Individual Unit Summary for Revisions
- AMOC No. 218

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

Date: 9/15/2025	
Permit No.: O3186	
Regulated Entity No.: RN100215532	
Company Name: ET Gathering & Processing LLC	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☐ Renewal	
☒ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☒ NO

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

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*						
☒ VOC	☒ NO_X	☒ SO_2	☐ PM_{10}	☐ 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: 9/15/2025
Permit No.: O3186
Regulated Entity No.: RN100215532
Company Name: ET Gathering & Processing LLC

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

Revision No.	Revision Code		Unit/Group	Process	NSR Authorization	Description of Change and Provisional Terms and Conditions
		New Unit	ID No.	Applicable Form		
1	ADMIN-G	No	MIVIDA-FUG	OP-UA1	113099	To incorporate the Alternate Means of Compliance for fugitive monitoring methods. Provisional requirements: AMOC.
2	MS-C	No	MIVIDA-FUG	OP-UA1	113099	Change in the fugitive monitoring method from NSPS OOOO Method 21 under 60.5400 to NSPS OOOOb optical gas imaging (OGI) under 60.5400b and Appendix K. The monitoring frequency will not change as part of the revision. Provisional requirements: OP-REQ3.
3	MS-C	No	MIVIDAFUG2	OP-UA12	113099	Delete MIVIDAFUG2 ID and associated regulatory applicability for NSPS OOOOa

Texas Commission on Environmental Quality
Miscellaneous Unit Attributes
Form OP-UA1 (Page 1)
Federal Operating Permit Program

Date:	**9/15/2025**
Permit No.:	**O3186**
Regulated Entity No.:	**RN100215532**

Unit ID No.	SOP/GOP Index No.	Unit Type	Date Constructed/Placed in Service	Functionally Identical Replacement	Maximum Rated Capacity	Technical Information and Unit Description
MIVIDA-FUG	60OOOOb-0001	EU				Fugitive monitoring requirements associated with NSPS OOOOb for which a unit attribute form and applicability flowchart has not yet been created. All applicable citations are included on Form OP-REQ3.

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

Table 1a: Additions

Date: 9/15/2025	**Regulated Entity No.:** RN100215532	**Permit No.:** O3186
Company Name: ET Gathering & Processing LLC	**Area Name:** Mi Vida Treater Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	MIVIDA-FUG	OP-UA1	60OOOOb-0001	VOC	40 CFR Part 60, Subpart OOOOb	§60.5370b(a)(4) §60.5370b(b) §60.5400b(a) §60.5400b(b) §60.5400b(c) §60.5400b(d) §60.5400b(e) §60.5400b(f) §60.5400b(g) §60.5400b(h) §60.5400b(i) §60.5400b(j) §60.5410b(h) §60.5411b(a)(2) §60.5411b(a)(3) §60.5411b(a)(4) §60.5411b(c) §60.5412b(a)(3) §60.5412b(b) §60.5415b(f)(1)(i) §60.5415b(f)(1)(ii) §60.5415b(f)(1)(iii)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§60.5415b(f)(1)(iv) §60.5415b(f)(1)(v) §60.5415b(f)(1)(vi) §60.5415b(f)(1)(vii)(A) §60.5415b(f)(1)(vii)(B) §60.5415b(f)(1)(x) §60.5415b(j)

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

Table 1b: Additions

Date: 9/15/2025	**Regulated Entity No.:** RN100215532	**Permit No.:** O3186
Company Name: ET Gathering & Processing LLC	**Area Name:** Mi Vida Treater Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	MIVIDA-FUG	60OOOOb-0001	VOC	§60.5400b(b) §60.5400b(c) §60.5400b(d) §60.5400b(e) §60.5400b(g) §60.5400b(h) §60.5410b(h)(1) §60.5410b(h)(2) §60.5410b(h)(3) §60.5410b(h)(4) §60.5410b(h)(5) §60.5410b(h)(6) §60.5410b(h)(7) §60.5410b(h)(8) §60.5410b(h)(9) §60.5410b(h)(10) §60.5410b(h)(12) §60.5415b(f)(1)(x) §60.5415b(j)(1) §60.5415b(j)(2)	§60.5400b(l) §60.5410b(h)(11)(vi) §60.5410b(h)(15) §60.5411b(c) §60.5415b(j)(15) §60.5416b(b)(9) §60.5420b(c)(8)(i) §60.5420b(c)(8)(ii) §60.5420b(c)(8)(iii) §60.5420b(c)(8)(iv) §60.5420b(c)(10) §60.5420b(c)(11)(ii) §60.5420b(c)(11)(iv) §60.5420b(c)(11)(v) §60.5420b(c)(11)(vi) §60.5420b(c)(11)(vii) §60.5420b(c)(11)(viii) §60.5420b(c)(12) §60.5420b(c)(13) §60.5421b(a)	§60.7(a)(1) §60.7(a)(3) §60.7(a)(4) §60.15(d) §60.5400b(k) §60.5410b(h)(13) §60.5410b(h)(14) §60.5415b(j)(14) §60.5417b(j) §60.5420b(a)(1) §60.5420b(b)(1) §60.5420b(b)(11)(i) §60.5420b(b)(11)(ii) §60.5420b(b)(11)(iii) §60.5420b(b)(11)(iv) §60.5420b(b)(11)(v)(A) §60.5420b(b)(11)(i)(B) §60.5420b(b)(11)(i)(C) §60.5420b(b)(11)(i)(D) §60.5420b(b)(11)(i)(E)

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
				§60.5415b(j)(3) §60.5415b(j)(4) §60.5415b(j)(11) §60.5415b(j)(12) §60.5415b(j)(13) §60.5415b(j)(13) §60.5416b(a)(1) §60.5416b(a)(2) §60.5416b(a)(4) §60.5416b(b)(1)(ii) §60.5416b(b)(2) §60.5416b(b)(3) §60.5416b(b)(5) §60.5416b(b)(6) §60.5416b(b)(7) §60.5416b(b)(8) §60.5417b(a) §60.5417b(c) §60.5417b(d)(8) §60.5417b(e)(2) §60.5417b(e)(4) §60.5417b(e)(5) §60.5417b(g)(1) §60.5417b(g)(4) §60.5417b(g)(5) §60.5417b(g)(7) §60.5417b(h)	§60.5421b(b)	§60.5420b(b)(11)(i)(F) §60.5420b(b)(11)(i)(G) §60.5420b(b)(11)(i)(H) §60.5420b(b)(11)(i)(I) §60.5420b(b)(11)(i)(J) §60.5420b(b)(11)(i)(K) §60.5420b(b)(11)(i)(L) §60.5420b(b)(12) §60.5420b(b)(13) §60.5420b(b)(15) §60.5420b(d) §60.5420b(e) §60.5420b(f) §60.5422b(a) §60.5422b(b) §60.5422b(c)

Applicable Requirements Summary
Form OP-REQ3 (Page 3)
Federal Operating Permit Program

Table 2a: Deletions

Date: 9/15/2025	**Regulated Entity No.:** RN100215532	**Permit No.:** O3186
Company Name: ET Gathering & Processing LLC	**Area Name:** Mi Vida Treater Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
2	MIVIDA-FUG	OP-UA12	60OOOO-0002	VOC	40 CFR Part 60, Subpart OOOO	**Pressure relief device in gas/vapor service:** § 60.5400(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-4a(a) § 60.482-4a(b)(1) § 60.482-4a(b)(2) § 60.482-4a(c) § 60.482-4a(d)(1) § 60.482-4a(d)(2) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5401(b)(1)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§ 60.5401(b)(2) § 60.5401(b)(3)(i) § 60.5401(b)(3)(ii) § 60.5401(b)(4)(i) § 60.5401(b)(4)(ii) § 60.5410(f) § 60.5420(a)(1) § 60.5422(b) **Valves**: § 60.5400(b) § 60.483-1a(a) § 60.483-1a(b) § 60.483-1a(b)(3) § 60.483-1a(c) § 60.483-1a(c)(2) § 60.483-1a(c)(3) § 60.483-1a(d) § 60.483-2a(a)(1) § 60.483-2a(b)(1) § 60.483-2a(b)(2) § 60.483-2a(b)(3) § 60.483-2a(b)(4) § 60.483-2a(b)(5) § 60.485a(b) [G]§ 60.485a(h) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Closed vent systems leaks:** § 60.5400(a)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§ 60.482-10a(a) [G]§ 60.482-10a(f) [G]§ 60.482-10a(g) § 60.482-10a(h) § 60.482-10a(i) [G]§ 60.482-10a(j) [G]§ 60.482-10a(k) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Connectors in gas and vapor and light liquid service:** § 60.5400(a) § 60.482-11a(b)(2) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(i) § 60.482-11a(d) [G]§ 60.482-11a(e) [G]§ 60.482-11a(f)(1) § 60.482-11a(f)(2) § 60.482-11a(g) § 60.482-9a(a) § 60.482-9a(b) § 60.485a(b) § 60.486a(a)(1)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§ 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Flares:** § 60.5400(a) § 60.18(b) § 60.482-10a(a) § 60.482-10a(d) § 60.482-10a(m) § 60.482-1a(a) § 60.482-1a(b) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Valves in gas/vapor service:** § 60.5400(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-7a(a)(1) [G]§ 60.482-7a(a)(2) § 60.482-7a(b)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						[G]§ 60.482-7a(c) [G]§ 60.482-7a(d) [G]§ 60.482-7a(e) [G]§ 60.482-7a(f) [G]§ 60.482-7a(g) [G]§ 60.482-7a(h) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1) **Pumps in light liquid service:** § 60.5400(a) § 60.482-1a(a) § 60.482-1a(b) § 60.482-2a(a)(1) § 60.482-2a(a)(2) § 60.482-2a(b)(1) § 60.482-2a(b)(1)(i) § 60.482-2a(b)(1)(ii) § 60.482-2a(b)(2) § 60.482-2a(b)(2)(ii) § 60.482-2a(c)(1) [G]§ 60.482-2a(c)(2) § 60.482-2a(d) [G]§ 60.482-2a(d)(1) § 60.482-2a(d)(2)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
						§ 60.482-2a(d)(3) [G]§ 60.482-2a(d)(6) [G]§ 60.482-2a(e) § 60.482-2a(f) [G]§ 60.482-2a(g) § 60.482-2a(h) § 60.482-9a(a) § 60.482-9a(b) [G]§ 60.482-9a(d) § 60.482-9a(f) § 60.485a(b) § 60.485a(c) § 60.485a(c)(1) § 60.485a(f) § 60.486a(a)(1) § 60.486a(a)(2) § 60.486a(k) § 60.5370(b) § 60.5400(f) § 60.5410(f) § 60.5420(a)(1)

Applicable Requirements Summary
Form OP-REQ3 (Page 4)
Federal Operating Permit Program

Table 2b: Deletions

Date: 9/15/2025	**Regulated Entity No.:** RN100215532	**Permit No.:** O3186
Company Name: ET Gathering & Processing LLC	**Area Name:** Mi Vida Treater Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
2	MIVIDA-FUG	OP-UA12	60OOOO-0002	VOC	**Pressure relief device in gas/vapor service:** § 60.482-4a(b)(2) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401(b)(1) § 60.5401(g) **Valves:** § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.483-1a(b)(2) § 60.483-1a(c)(1) § 60.483-2a(b)(7)	**Pressure relief device in gas/vapor service:** § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(10) § 60.486a(e)(3) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.5420(c) [G]§ 60.5421(b) **Valves:** § 60.483-2a(b)(6) § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) [G]§ 60.486a(g)	**Pressure relief device in gas/vapor service:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) § 60.5422(b) [G]§ 60.5422(c) **Valves:** § 60.483-1a(b)(1) § 60.483-1a(b)(2) § 60.487a(a) § 60.487a(b)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401(f) § 60.5401(g) **Closed vent systems leaks:** § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) § 60.5401(g) **Connectors in gas and vapor and light liquid service:** § 60.482-11a(a) § 60.482-11a(b) § 60.482-11a(b)(1) § 60.482-11a(b)(3) § 60.482-11a(b)(3)(ii) [G]§ 60.482-11a(b)(3)(iii) § 60.482-11a(b)(3)(iv) § 60.482-11a(c) § 60.482-9a(a)	**Closed vent systems leaks:** [G]§ 60.482-10a(l) § 60.485a(b)(2) [G]§ 60.486a(d) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.5420(c) **Connectors in gas and vapor and light liquid service:** § 60.482-11a(b)(3)(v) § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.486a(e)(9) § 60.486a(f) § 60.486a(f)(1) § 60.5420(c) **Flares:** § 60.485a(b)(2) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(8) § 60.5420(c) **Valves in gas/vapor service:**	§ 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(i) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(d) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Closed vent systems leaks:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Connectors in gas and vapor and light liquid service:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(5)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					§ 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401(f) § 60.5401(g) **Flares:** § 60.482-10a(e) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(g) § 60.5401(g) **Valves in gas/vapor service:** § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e)	§ 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) § 60.486a(f)(2) § 60.5420(c) **Pumps in light liquid service:** § 60.485a(b)(2) [G]§ 60.486a(a)(3) [G]§ 60.486a(b) [G]§ 60.486a(c) § 60.486a(e) § 60.486a(e)(1) [G]§ 60.486a(e)(2) [G]§ 60.486a(e)(4) § 60.486a(e)(7) [G]§ 60.486a(e)(8) § 60.486a(f) § 60.486a(f)(1) [G]§ 60.486a(h) § 60.5420(c)	§ 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(vii) § 60.487a(c)(2)(viii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Flares:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Valves in gas/vapor service:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(2) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2)

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
					[G]§ 60.5401(f) § 60.5401(g) **Pumps in light liquid service:** § 60.482-1a(f)(1) § 60.482-1a(f)(2) [G]§ 60.482-1a(f)(3) § 60.482-2a(b)(2)(i) [G]§ 60.482-2a(d)(4) [G]§ 60.482-2a(d)(5) § 60.482-9a(a) § 60.485a(a) [G]§ 60.485a(b)(1) § 60.485a(b)(2) § 60.485a(c)(2) § 60.485a(d) § 60.485a(d)(2) § 60.485a(d)(3) [G]§ 60.485a(e) [G]§ 60.5401(f) § 60.5401(g)		§ 60.487a(c)(2)(i) § 60.487a(c)(2)(ii) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1) **Pumps in light liquid service:** § 60.487a(a) § 60.487a(b) § 60.487a(b)(1) § 60.487a(b)(3) § 60.487a(c) § 60.487a(c)(1) § 60.487a(c)(2) § 60.487a(c)(2)(iii) § 60.487a(c)(2)(iv) § 60.487a(c)(2)(xi) § 60.487a(c)(3) § 60.487a(c)(4) § 60.487a(e) § 60.5420(a) § 60.5420(a)(1)

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
9/15/2025	O3186	RN100215532

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	1	MIVIDA-FUG	OP-UA1	Site Fugitives		113099	
	2	MIVIDA-FUG	OP-UA1	Site Fugitives		113099	
	3	MIVIDAFUG2	OP-UA12	Site Fugitives		113099	

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2025

MR TOBY CLARK
VICE PRESIDENT OPERATIONS
ET GATHERING & PROCESSING LLC
600 N MARIENFIELD ST, SUITE 700
MIDLAND TX 79701-

Re: Alternative Method of Compliance (AMOC) No. 218
Standard Permit Equivalency Review
Alternative Optical Gas Imaging Leak Detection and Repair
Customer Reference Number: CN606187110
Associated Permit Numbers: see below

Dear Mr. Clark:

This correspondence is in response to ET Gathering & Processing LLC's (ET's) December 12, 2022 request to follow an alternative method of compliance (AMOC) for fugitive leak detection and repair (LDAR) work practices using optical gas imaging (OGI) at several oil and gas sites currently authorized by the § 116.620 Oil and Gas Production Standard Permits (§116.620) or the Non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities Effective November 8, 2012 (NRSP).

We understand ET has requested the ability for designated sites to follow the OGI LDAR requirements of 40 CR 60 Subpart OOOOb Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after December 6, 2022 (NSPS OOOOb) and Appendix K Determination of Volatile Organic Compound and Greenhouse Gas Leaks Using Optical Gas Imaging (Appendix K) instead of the specific conditions for fugitive LDAR monitoring using traditional Method 21 and LDAR work practices as required in §116.620 or the NRSP. In some cases, facilities are subject to NSPS OOOOb, at other sites following this alternative would be voluntary.

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a final decision to approve your AMOC request using the authority under §116.615(7) *Equivalency* review process. The sites listed below are covered by this AMOC and may follow the attached Conditions for the use of OGI LDAR for compliance. You are reminded that approval of any AMOC shall not abrogate the Executive Director or Administrator's authority or in any way prohibit later canceling the AMOC. By copy of this letter, we are informing the Environmental Protection Agency, Region 6.

This AMOC approval may supersede certain requirements or representations in the referenced Standard Permit registrations. To ensure effective and consistent enforceability, we request that ET incorporate this AMOC into the registrations through a hard-copy submittal of a Revision. This revision should be sent directly to the Air Permits Division and any appropriate TCEQ Regional office or local air pollution control program no later than 90 days after this approval, if being used at a site. That notification shall include all supporting, site-specific documentation.

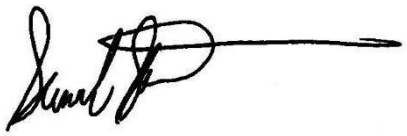
This approval may also change applicable requirements for the site, which are identified in the site operating permits (SOPs) listed. The TCEQ recommends the submittal of an SOP administrative revision if any changes are necessary. Changes meeting the criteria for an administrative revision can be operated before issuance of the revision if a complete application is submitted to the TCEQ and this information is maintained with the SOP records at the site.

Re: AMOC 218

Site Name	Regulated Entity No.	City, County (TCEQ Region)	Standard Permit No.	SOP No.
Tippett Gas Plant	RN100217843	McCamey, Crockett TCEQ Region 8	§116.620 #107048	O3190
Panther Gas Plant	RN109124057	Rankin, Upton TCEQ Region 7	§116.620 # 139259	O4448
Rebel Gas Plant	RN106934664	Garden City, Glasscock TCEQ Region 7	§116.620 # 114311	O4459
Halley Gas Plant	RN100218916	Kermit, Winkler TCEQ Region 7	NRSP #109262	O3254
Mi Vida Treatment Plant	RN100215532	Barstow, Ward TCEQ Region 7	§116.620 #113099	O3185
Bear Gas Processing Plant	RN111529814	Orla, Reeves TCEQ Region 7	§116.620 #169564	O4446
Grey Wolf Gas Plant	RN111436614	Wink, Winkler TCEQ Region 7	§116.620 #168018	O4447
Badger Gas Plant	RN112007323	Orla, Culberson TCEQ Region 6	§116.620 #176888	O4749

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



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

cc: Alena Miro, Environmental Manager, Energy Transfer
Stephanie Pina, Sr Engineer, WTX – Operations
Elizabeth McGurk, Montrose Environmental
Air Section Manager, Region 6 – El Paso
Air Section Manager, Region 7 - Midland
Air Section Manager, Region 8 - San Angelo
Michael Partee, Manager, Rule Registrations Section, Air Permits Division, OA: MC-163
Rhyan Stone, Manager, Operating Permits Section, Air Permits Division, OA: MC-163
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 351877

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Alternative Method of Control (AMOC) Plan, AMOC Number: AMOC-218
ET Gathering and Processing, LLC (ET)
Customer Identification Number CN606187110
Alternative Fugitive Leak Detection and Repair (LDAR) Program

I. This AMOC Plan Authorization shall apply at the following ET Gathering and Processing, LLC (ET) sites:

Site Name	Responsible Official	Regulated Entity Number	City, County (TCEQ Region)	Standard Permit	Title V Permit
Tippett Gas Plant	Chris Thompson	RN100217843	McCamey, Crockett (Region 8)	§116.620 SP # 107048	O3190
Panther Gas Plant	Andrew Mann	RN109124057	Rankin, Upton (Region 7)	§116.620 SP # 139259	O4448
Rebel Gas Plant	Andrew Mann	RN106934664	Garden City, Glasscock (Region 7)	§116.620 SP # 114311	O4459
Halley Gas Plant	Chris Thompson	RN100218916	Kermit, Winkler (Region 7)	NRSP SP #109262	O3099
Mi Vida Treatment Plant	Chris Thompson	RN100215532	Barstow, Ward (Region 7)	§116.620 #113099	O3185
Bear Gas Processing Plant	Chris Thompson	RN111529814	Orla, Reeves (Region 7)	§116.620 #169564	O4446
Grey Wolf Gas Plant	Chris Thompson	RN111436614	Wink, Winkler (Region 7)	§116.620 #168018	O4447
Badger Gas Plant	Chris Thompson	RN112007323	Orla, Culberson (Region 6)	§116.620 #176888	O4749

II. A copy of the AMOC application and the AMOC Plan provisions must be kept on-site or at a centralized location and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any pollution control agency with jurisdiction. This AMOC authorization is defined by the application received December 12, 2022, and supporting documentation submitted through August 20, 2025.

III. This authorization is granted under § 116.617 for emissions sources regulated by 30 Texas Administrative Code (TAC) Chapter 116, Subchapter F, Standard Permits:

- §116.620 Installation and/or Modification of Oil and Gas Facilities (§ 116.620), and/or
- Non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities (NRSP).

This AMOC shall apply in lieu of the requirements in these state authorization conditions, as applicable. Compliance with this AMOC is independent of the regulated entity's obligation to comply with all other applicable requirements of 30 TAC Chapters, TCEQ permits, and applicable state and federal laws. Compliance with the requirements of this plan does not assure compliance with requirements of an applicable New Source Performance Standard (NSPS), National Emission Standard for Hazardous Air Pollutants (NESHAPs), or an Alternative Means of Emission Limitation (AMEL) and does not constitute approval of alternative standards for these regulations.

IV. In accordance with 30 TAC § 116.615(2), all representations submitted for these standard permit authorized facilities and this AMOC, as well as the provisions listed here, become conditions upon which this AMOC Plan is issued. It is unlawful to vary from the emission limits, control requirements, monitoring, testing, reporting or recordkeeping requirements of this Plan.

V. For sites authorized by §116.620, the requirements in Condition No. 6 apply to fugitive emissions components for leak detection and repair (LDAR) and supersedes the requirements in 30 TAC § 116.620(c) and (d)(1).

For sites authorized by the NRSP, the requirements in Condition No. 6 apply to fugitive emissions components for LDAR and supersedes the requirements in Standard Permit (d)(1)(A), (e)(6), and relevant fugitive LDAR portions of Tables 7, 8, and 9.

VI. The following requirements may be applied to fugitive emissions components affected facilities to reduce fugitive emissions of methane and volatile organic compounds (VOC) on a voluntary basis, and has been determined to be equivalent to the LDAR referenced paragraph V. If the company opts to revert to the previous LDAR Program referenced above, the TCEQ Region Office must be notified and associated records and reports updated.

This condition must be met for each fugitive component as listed and represented in the AMOC revised application dated March 10, 2025, through August 20, 2025. Compliance must be achieved as soon as practicable but no later than 90 days from the issuance date of this AMOC or start-up of associated facilities.

A. <u>General Requirements and Applicability.</u>

1. The following are applicable to this condition:

   i. All process unit equipment fugitive components at an onshore natural gas processing plant including each pump, pressure relief device, open-ended valve or line, valve, and flange or other connector that has the potential to emit methane or VOC and any device or system required by this condition.

   ii. "No detectable emissions" or a "leak" is defined by ≥ 500 ppmv using a FID-based or catalytic combustion-based instrument for valves and connectors and ≥ 2,000 ppmv for pumps following the requirements in 40 CFR 60, Appendix A-7, Method 21 (Method 21). The instrument shall be calibrated before use each day of use by the procedures specified and using zero air and a mixture of methane or n-hexane and air at a concentration no more than 2,000 ppmv.

   iii. Alternatively, a "leak" is defined as any emissions observed using an optical gas imaging (OGI) camera. Any OGI monitoring must follow 40 CFR 60, Appendix K "Determination of Volatile Organic Compound and Greenhouse Gas Leaks Using Optical Gas Imaging".

   iv. Equipment is in light liquid service when all the following conditions apply based on representative samples of the process fluid that is contained in or contacts the equipment, or gas being combusted in a flare. Standard reference texts or ASTM D2879-83, -96, or -97 shall be used to determine vapor pressures.

      a. The vapor pressure of one or more of the organic components is greater than 0.3 kPa at 20 °C (1.2 in H_2O at 68 °F);

      b. The total concentration of the pure organic components having a vapor pressure greater than 0.3 kPa at 20 °C (1.2 in H_2O at 68 °F) is equal to or greater than 20 percent by weight;

      c. The fluid is a liquid at operating conditions; or

      d. If the weight percent evaporated is greater than 10 percent at 150 degrees Celsius (302 degrees Fahrenheit) as determined by ASTM D86-96.

   v. Each piece of equipment or component is presumed to have the potential to emit methane or VOC unless an owner or operator demonstrates otherwise. For a piece of equipment to be considered not to have the potential to emit methane or VOC, the methane and VOC content of a gaseous stream must be below detection limits using Method 18 of 40 CFR 60 Appendix A-6. Alternatively, if the piece of equipment is in wet gas service, methane and VOC content of the stream may be determined by being below the detection limit of the methods described in ASTM E168-16(R2023), E169-16(R2022), or E260-96.

2. The following are exempt from this condition:

   i. Pumps in light liquid service, pressure relief devices in gas/vapor service, valves in gas/vapor and light liquid service, and connectors in gas/vapor service and in light liquid service that are located at a non-fractionating plant with a design capacity less than 10 million standard cubic feet per day (10 MMscfd) of field gas are exempt from:

      a. Bi-monthly OGI monitoring requirements as required under paragraph (B)(1)(i) of this condition; or

b. Routine Method 21 monitoring requirements as required under paragraph (B)(2) of this condition.

ii. Equipment that is in vacuum service, except connectors in gas/vapor and light liquid service, is excluded from the requirements of this condition if identified in all initial and subsequent reports.

iii. Equipment designated as having the potential to emit methane or VOC less than 300 hr/yr is excluded from the requirements of this condition if it meets any of the conditions specified below:

a. The equipment has the potential to emit methane or VOC only during startup and shutdown.

b. The equipment is backup equipment that has the potential to emit methane or VOC only when the primary equipment is out of service.

3. The following process unit equipment fugitive components at a natural gas processing plant must comply with this condition:

i. Pressure relief devices (PRDs) in gas/vapor service;

ii. Valves in gas/vapor service or light liquid service;

iii. Connectors in gas/vapor service or light liquid service;

iv. Pumps in light liquid service;

v. PRDs in light liquid service;

vi. Pumps, valves, connectors, and PRDs in heavy liquid service.

vii. Open-ended valves or lines; and

viii. Closed vent systems and control devices used to comply with any equipment leak provisions

4. New and Reworked Equipment. The following requirements apply to all equipment, as applicable:

i. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.

ii. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.

iii. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation.

iv. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer method within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance.

5. UTM, DTM, and Open-Ended Valves or Lines

i. Components that are considered inaccessible (e.g., insulated components), difficult-to-monitor (DTM), or unsafe-to-monitor (UTM) when using a Method 21 instrument shall be monitored with the OGI as long as such components are not considered DTM or UTM when using an OGI. All such components shall be included in company records and reporting.

ii. A DTM valve or line is a component that cannot be inspected without elevating the monitoring personnel more than two meters above a permanent support surface or that requires a permit for confined space entry as defined in 29 CFR §1910.146 or 30 TAC §115.352(7). For natural gas processing plants, less than 3.0 % of the total number of fugitive components may be designated as DTM.

iii. An UTM component is designated if monitoring personnel would be exposed to an immediate danger as a consequence of conducting the monitoring. Any fugitive component that is designated as UTM is exempt from routine monitoring if the monitoring plan requires monitoring as frequently as practicable during safe-to-monitor times (but not more frequently than the periodic monitoring schedule otherwise applicable).

iv. All DTM or UTM components shall be evaluated for accessibility to complete repairs. Records of these evaluations shall be developed and maintained by the facility. If a leak is detected, the equipment must be repaired according to the procedures in paragraph (C) of this condition.

v. Each open-ended valve or line must be designed, operated, and comply with the following:

a. Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve, except as provided in subparagraphs (e) and (f). The cap, blind flange, plug, or second valve must seal the open end of the valve or line at all times except during operations requiring process fluid flow through the open-ended valve or line.

b. If evidence of a leak is found at any time by AVO, or any other detection method, a leak is detected.

c. Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

d. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall remain closed at all other times.

e. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of this condition.

f. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block-and-bleed system are exempt from the requirements of this condition.

B. ***Operational And Emissions Limits*.**

1. **Conduct OGI Surveys**: Comply with the following. If any leaks are detected, repairs and re-monitoring must follow paragraph C of this condition.

i. Conduct bimonthly monitoring surveys of all equipment fugitive components using OGI. Each fugitive component shall be observed or monitored during each monitoring survey.

ii. All pumps in light liquid service must be monitored per the following:

a. Conduct weekly visual inspections for indications of liquids dripping from the pump seal.

b. If there are indications of liquids dripping from the pump seal, either repair the leak or monitor the pump within 5 calendar days using OGI or Method 21. Any pump seal leak observed by OGI or measured by Method 21 ≥ 2000 ppmv must be repaired following paragraph C. Any pump equipped with a CVS is exempt from visual inspection requirements.

iii. PRDs in gas/vapor service must be monitored within 5 calendar days after each pressure release to detect leaks using OGI or Method 21 unless the exceptions below are met. Any leak observed using OGI or ≥ 500 ppmv by Method 21 must be repaired.

a. Any pressure relief device that is located in a non-fractionating plant that is monitored only by non-plant personnel may be monitored after a pressure release the next time the monitoring personnel are onsite or within 30 calendar days after a pressure release, whichever is sooner, instead of within 5 calendar days as specified. No pressure relief device described in this paragraph may be allowed to operate for more than 30 calendar days after a pressure release without monitoring.

b. Any pressure relief device that is routed to a CVS is exempt from these requirements.

iv. For PRDs in light liquid service and pumps, valves, connectors, and PRDs in heavy liquid service**,** if evidence of a potential leak is found at any time by AVO or any other detection method, the equipment must be repaired.

v. Any fugitive component routed to a closed vent system (CVS) and vented to a control, process, or fuel gas system must comply be designed and operated with no identifiable fugitive emissions and meet the following:

a. For each joint, seam, or other connection that is permanently or semi-permanently sealed (*e.g.,* a welded joint between two sections of hard piping or a bolted and gasketed ducting flange), conduct an initial inspection to demonstrate no identifiable emissions within the first 30 days after startup of the system.

b. Conduct annual AVO inspections for defects that can result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in ductwork; loose connections; liquid leaks; or broken or missing caps or other closure devices.

c. Following any time a component or connection is unsealed for repair or replacement. Monitor a component or connection using the test methods and procedures in this condition to demonstrate that it operates with no identifiable emissions.

d. Any CVS, process, or control device bypass device must meet the following:

I. Set the flow indicator to take a reading at least once every 15 minutes at the inlet to the bypass device that could divert the stream away from the control device and to the atmosphere.

II. If the bypass device valve installed at the inlet to the bypass device is secured in the non-diverting position using a car-seal or a lock-and-key type configuration, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass device.

2. Alternative Method 21 Surveys. An owner or operator may choose to comply with all of the following requirements instead of the requirements in paragraph (B)(1) above. If any leaks are detected, repairs and re-monitoring must follow paragraph C of this condition.

i. Each pump in light liquid service must be monitored per the following, except as provided in subparagraphs (c)-(f) below.

a. Each pump must be monitored monthly by Method 21 to detect leaks. A leak is defined as an instrument reading of 2,000 ppmv or greater.

b. Conduct weekly visual inspections for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, either repair the leak or monitor the pump within 5 calendar days using OGI or Method 21. Any pump seal leak observed by OGI or measured by Method 21 ≥ 2,000 ppmv must be repaired.

c. Any pump is equipped with a CVS that complies is exempt from monitoring and visual inspection requirements.

d. Any pump that is designated as UTM that meets this condition is exempt.

e. Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt, provided all the following requirements are met:

I. Each dual mechanical seal system is operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a CVS to a control device; or equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

II. The barrier fluid system is in heavy liquid service or does not have the potential to emit methane or VOC.

III. Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.

IV. Each pump is checked according to the requirements in subparagraphs (a)-(b) above.

V. Each sensor where each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both, is checked daily or is equipped with an audible alarm. Based on design considerations and operating experience, criterion that indicates failure of the seal system, the barrier fluid system, or both is established. If the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.

f. Any pump that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background, is exempt from the requirements in subparagraphs (a)-(b) if the pump:

I. Has no externally actuated shaft penetrating the pump housing; and

II. Is demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background as determined by Method 21 initially upon designation, annually, and at other times requested by the Administrator.

g. Any pump that is designated as an UTM pump is exempt.

ii. For each pressure relief device (PRD) in gas/vapor service, comply with the following:

a. Monitor each pressure relief device quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater above background.

b. In addition, after each pressure release, monitor each pressure relief device within 5 calendar days to detect leaks using or Method 21 unless the device is located in a non-fractionating plant that is monitored only by non-plant personnel which may be monitored after a pressure release the next time the monitoring personnel are onsite or within 30 calendar days after a pressure release, whichever is sooner. No pressure relief device may be allowed to operate for more than 30 calendar days after a pressure release without monitoring.

c. Any pressure relief device that is routed to a process or fuel gas system or equipped with a CVS to a control device must comply with the applicable requirements of this condition.

d. Pressure relief devices equipped with a rupture disk are exempt from fugitive monitoring requirements provided a new rupture disk is installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in the delay of repair criteria in paragraph (C).

iii. Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve, except as provided in (d) or (e) of this paragraph. The cap, blind flange, plug, or second valve must seal the open end of the valve or line at all times except during operations requiring process fluid flow through the open-ended valve or line.

a. If evidence of a leak is found at any time by AVO, or any other detection method, a leak is detected and must be repaired in accordance with this condition. A leak is defined as an instrument reading of 500 ppmv or greater if Method 21 of appendix A-7 to this part is used.

b. Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

c. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall remain closed at all other times.

d. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of this paragraph.

e. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block-and-bleed system are exempt from the requirements of this section.

iv. Each valve in gas/vapor or light liquid service must be monitored quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater. A valve that begins operation in gas/vapor service or in light liquid service after the initial startup date for the process unit must be monitored for the first time within 90 days after the end of its startup period to ensure proper installation, except for a valve that replaces a leaking valve, or is designated as UTM, DTM, or no detectable emissions.

v. For each pump, valve, and connector in heavy liquid service and pressure relief device in light liquid or heavy liquid service, if evidence of a potential leak is found at any time by AVO, or any other detection method, comply with one of the following:

a. Monitor the equipment within 5 calendar days by OGI or Method 21 and repair any leaks detected according to paragraph C of this condition. An instrument reading of 10,000 ppmv or greater is defined as a leak.

b. Designate the AVO, or other indication of a leak, as a leak and repair the leak according to paragraph C of this condition.

vi. All connectors in gas/vapor service and in light liquid service in the process unit shall be monitored within 12 months of the start-up of the process unit (initially) and annually using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater.

a. Any connector that is designated as an UTM connector is exempt.

b. DTM (inaccessible), ceramic, or ceramic-line connectors are exempt from this condition. If any inaccessible, ceramic, or ceramic-lined connector is observed by AVO or other means to be leaking, the indications of a leak to the atmosphere by AVO or other means must be eliminated as soon as practicable. Inaccessible connectors meet any of the following:

I. Buried.

II. Insulated in a manner that prevents access to the connector by a monitor probe.

III. Obstructed by equipment or piping that prevents access to the connector by a monitor probe.

IV. Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold that would allow access to connectors up to 7.6 meters (25 feet) above the ground.

V. Inaccessible because it would require elevating monitoring personnel more than 2 meters (7 feet) above a permanent support surface or would require the erection of scaffold.

VI. Not able to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines or would risk damage to equipment.

c. Connectors which are part of an instrumentation systems, and inaccessible, ceramic, or ceramic-lined connectors are not subject to the recordkeeping requirements of this condition.

C. **Repairs and Re-monitoring**. When a leak is detected, comply with the following repair and re-monitoring requirements:

1. A weatherproof and readily visible identification tag, marked with the equipment identification number, must be attached to the leaking equipment. The identification tag on equipment may be removed after it has been repaired.

2. A first attempt at repair must be made as soon as practicable, but no later than 5 calendar days after the leak is detected.

   A first attempt at repair is not required if the leak is detected using OGI and the equipment identified as leaking would require elevating the repair personnel more than 2 meters above a support surface.

   i. First attempts at repair for pumps in light liquid or heavy liquid service include, but are not limited to, tightening the packing gland nuts and ensuring that the seal flush is operating at design pressure and temperature, where practicable.

   ii. Beginning January 22, 2027, or 180 days from start up, whichever is later, for each valve where a leak is detected, you must comply with the following:

   a. Repack the existing valve with a low-e packing (valve packing product for which the manufacturer has issued a written warranty or performance guarantee that it will not emit fugitives at greater than 100 ppm in the first five years. Low-e injectable packing is a type of low-e packing product for which the manufacturer has also issued a written warranty or performance guarantee and that can be injected into a valve during a “drill-and-tap” repair of the valve);

   b. Replace the existing valve with a low-e valve (valves, including its specific packing assembly, for which the manufacturer has issued a written warranty or performance guarantee that it will not emit fugitives at greater than 100 ppm in the first five years. A valve may qualify as a low-e valve if it is as an extension of another valve that has qualified as a low-e valve); or

   c. Perform a drill and tap repair with a low-e injectable packing.

   d. An owner or operator is not required to utilize a low-e valve or low-e packing to replace or repack a valve if the owner or operator demonstrates that a low-e valve or low-e packing is not technically feasible. Low-e valve or low-e packing that is not suitable for its intended use is considered to be technically infeasible. Factors that may be considered in determining technical

infeasibility include: retrofit requirements for installation (*e.g.,* re-piping or space limitation), commercial unavailability for valve type, or certain instrumentation assemblies.

3. Repair of leaking equipment must be completed within 15 calendar days after detection of each leak, except as provided in subparagraphs (4)-(6).
4. If the repair for visual indications of liquids dripping for pumps in light liquid service can be made by eliminating visual indications of liquids dripping, you must make the repair within 5 calendar days of detection.
5. If the repair for AVO or other indication of a leak for open-ended valves or lines; pumps, valves, or connectors in heavy liquid service; or pressure relief devices in light liquid or heavy liquid service can be made by eliminating the AVO, or other indication of a potential leak, you must make the repair within 5 calendar days of detection.
6. Delay of repair of equipment for which leaks have been detected is allowed if repair within 15 days is technically infeasible without a process unit shutdown or as specified in (i) – (v) below. Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.
    i. Delay of repair of equipment is allowed for equipment which is isolated from the process, and which does not have the potential to emit methane or VOC.
    ii. Delay of repair for valves and connectors is allowed if the following conditions are met.
        a. Demonstrate that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
        b. When repair procedures are conducted, the purged material is collected and destroyed or recovered in a control device meeting these conditions.
    iii. Delay of repair for pumps is allowed if the following conditions are met.
        a. Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
        b. Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
    iv. If delay of repair is required to repack or replace the valve. Delay of repair beyond a process unit shutdown is allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
    v. When delay of repair is allowed for a leaking pump, valve, or connector that remains in service, the pump, valve, or connector may be considered to be repaired and no longer subject to delay of repair requirements if two consecutive bimonthly monitoring results show no leak remains.

D. **Initial Compliance**

1. Submit initial notifications as required by the following:
    i. A notification of the date construction or reconstruction of an affected facility is commenced postmarked no later than 30 days after such date.
    ii. If a new or reconstructed facility, a notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
    iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which this permit applies. This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. TCEQ may request additional relevant information subsequent to this notice.
    iv. If an existing plant proposes to replace components, and the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new plant's components, the owner or operator shall notify the TCEQ of the

proposed replacements. The notice must be postmarked 60 days (or as soon as practicable) before construction of the replacements is commenced, and must include the following information:

a. Name and address of the owner or operator.

b. The location of the existing facility.

c. A brief description of the existing facility and the components which are to be replaced.

d. A description of the existing air pollution control equipment and the proposed air pollution control equipment.

e. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new facility.

f. The estimated life of the existing facility after the replacements.

g. A discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.

2. Within 90 days of the startup of production for each new / modified fugitive emissions component demonstrate and document the following, as applicable:

i. Conduct initial monitoring for all fugitive component types.

ii. Conduct monitoring for each pump in light liquid service, pressure relief device in gas/vapor service, valve in gas/vapor or light liquid service, connector in gas/vapor or light liquid service as required and document.

iii. Comply with the equipment requirements for each open-ended valve or line as required and document.

iv. For each pump equipped with a dual mechanical seal system that degasses the barrier fluid reservoir to a process or a control device, each pump which captures and transports leakage from the seal or seals to a process or a control device, or each pressure relief device which captures and transports leakage through the pressure relief device to a process or a control device, document meeting the following requirements:

a. Reduce methane and VOC emissions by 95.0 percent or greater (≥ 95.0 %) and document performance demonstration or route to a process.

b. Install a CVS to capture all emissions from each pump equipped with a dual mechanical seal system that degasses the barrier fluid reservoir, each pump which captures and transports leakage from the seal or seals, or each pressure relief device which captures and transports leakage through the pressure relief device and route all emissions to a process or to a control device.

c. If routing to a control device, conduct an initial performance test or install a control device with TCEQ-approved manufacturer's testing.

d. Conduct the initial inspections of the CVS and system(s) bypasses, if applicable.

e. Install, calibrate, operate and maintain continuous monitoring and recording devices to measure appropriate control device operating parameters.

I. Continuous parameter monitoring systems used to detect the presence of a pilot or combustion flame must record a reading at least once every 5 minutes. Heat sensing monitoring devices that indicate the continuous ignition of a pilot or combustion flame are exempt from the calibration, quality assurance and quality control requirements of this condition. All non-pilot/flame continuous parameter monitoring systems must measure data values at least once every hour, record each measured value, and calculate the 1-hour block average values (or shorter periods) from all measured data values during each time period for each parameter.

II. Prepare a monitoring plan that covers each control device which address the monitoring system design, data collection, quality assurance, and quality control elements (including, not limited to, sample interface type and location which provides representative measurements, detector signal analyzer, data acquisition, calculations, equipment performance checks, system accuracy audits or other audit procedures, ongoing operation and maintenance procedures, and all associated records). Install, calibrate, operate, and

maintain each continuous parameter monitoring system in accordance with the procedures in the monitoring plan.

III. Conduct the continuous parameter monitoring system equipment performance checks, system accuracy audits, or other audit procedures specified in the monitoring plan at least once every 12 months.

v. Tag and repair each identified leak as required in paragraph (C).

3. Submit any required site monitoring plans and an initial semiannual report for each fugitive emissions component no later than 90 days after the end of the initial compliance period specified in subparagraph (2) above. Submit all reports through CEDRI for 40 CFR 60, Subpart OOOOb. Include the following information:

i. Company name, facility site name, and address of the affected facility. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report".

ii. Beginning and ending dates of the reporting period.

iii. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If the report is submitted via CEDRI, the certifier's electronic signature must be included.

iv. For each process unit: identification number/name; and number of valves, pumps, connectors, and PRDs subject to the monitoring required in this condition, indicating light or heavy service.

v. For each month during the semiannual reporting period for each process unit: the number of valves, pumps, connectors, PRDs, and open-ended valves or lines for which leaks were detected; the number of any component(s) for which leaks were not repaired as required by this condition; and the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.

vi. Dates of process unit shutdowns which occurred within the semiannual reporting period.

vii. For any CVS or control device, manufacturer's written operating instructions, procedures, operating envelopes, and any performance tests. Maintain detailed records of inspections, identified leaks, repairs, maintenance, pilots, gas flow rates, and parametric monitoring, as applicable.

E. ***Continuous Compliance.*** At a minimum, demonstrate on-going compliance with the following for each fugitive component:

1. Conduct initial and periodic monitoring surveys as required by this condition.

2. Tag and repair each identified source of fugitive emissions as required paragraph (C) of this condition.

3. Submit semiannual and annual reports. All reports must contain the information required in subparagraphs (D)(1)-(3), as applicable. If changes have occurred since the previous report, include revisions to applicable items and subsequent compliance demonstrations. Include updates to any fugitive monitoring.

F. ***Records.*** At a minimum, meet the following for compliance demonstrations:

1. All records must be maintained either onsite or at the nearest local field office for at least 5 years and made available upon request.

2. Any records that are submitted electronically via EPA's CEDRI may be maintained in electronic format. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report". The ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to EPA, TCEQ, or any local air pollution control program with jurisdiction as part of an on-site compliance evaluation.

3. Maintain a file of: all measurements and surveys, including OGI, Method 21, continuous monitoring systems, monitoring devices, and performance testing measurements; all survey and monitoring system performance evaluations; all device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by these conditions recorded in a permanent form suitable for inspection.

4. For any CVS or control device, manufacturer's written operating instructions, procedures, operating envelopes, and any performance tests. Maintain detailed records of inspections, identified leaks, repairs, maintenance, pilots, gas flow rates, and parametric monitoring, as applicable.
5. For any bypass, maintain a record of the following, as applicable: readings from the flow indicator; each inspection of the seal or closure mechanism; the date and time of each instance the key is checked out; date and time of each instance the alarm is sounded.
6. Equipment exempted or excluded from these conditions shall be identified in a list or by one of the methods described below to be made readily available upon request and may be identified by one or more of the following methods:
    i. piping and instrumentation diagram (PID);
    ii. a written or electronic database or electronic file;
    iii. color coding;
    iv. a form of weatherproof identification; or
    v. designation of exempted process unit boundaries.

Texas Commission on Environmental Quality

Title V Existing

3186

Site Information (Regulated Entity)

What is the name of the permit area to be authorized?	MI VIDA TREATER PLANT
Does the site have a physical address?	No
Because there is no physical address, describe how to locate this site:	From Barstow go 0.5 mi N on RR516, turn NE on CR137 and go 0.1 mi to RR516, cont NW 5.5 mi to facility on right
City	Barstow
State	TX
ZIP	79777
County	WARD
Latitude (N) (##.######)	31.525833
Longitude (W) (-###.######)	103.4675
Primary SIC Code	1311
Secondary SIC Code	
Primary NAICS Code	211112
Secondary NAICS Code	
Regulated Entity Site Information	
What is the Regulated Entity's Number (RN)?	RN100215532
What is the name of the Regulated Entity (RE)?	MI VIDA TREATER PLANT
Does the RE site have a physical address?	No
Because there is no physical address, describe how to locate this site:	FROM BARSTOW GO 0.5 MI N ON RR 516 TURN NE ON CR 137 AND GO 0.1 MI TO RR 516 CONTINUE NW 5.5 MI TO FACILITY ON RIGHT
City	BARSTOW
State	TX
ZIP	79777
County	WARD
Latitude (N) (##.######)	31.525833
Longitude (W) (-###.######)	-103.4675
Facility NAICS Code	
What is the primary business of this entity?	NATURAL GAS COMPRESSION & TRANSMISSION

Customer (Applicant) Information

How is this applicant associated with this site?	Owner Operator
What is the applicant's Customer Number (CN)?	CN606187110
Type of Customer	Corporation
Full legal name of the applicant:	
Legal Name	ET Gathering & Processing LLC
Texas SOS Filing Number	805195570
Federal Tax ID	
State Franchise Tax ID	32091185952
State Sales Tax ID	
Local Tax ID	
DUNS Number	
Number of Employees	501+
Independently Owned and Operated?	Yes

Responsible Official Contact

Person TCEQ should contact for questions about this application:	
Organization Name	Energy Transfer LP
Prefix	MR
First	Christopher
Middle	
Last	Thompson
Suffix	
Credentials	
Title	Vice President Operations
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1706 S MIDKIFF RD
Routing (such as Mail Code, Dept., or Attn:)	
City	MIDLAND
State	TX
ZIP	79701

Phone (###-###-####)	4326382042
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	chris.thompson@energytransfer.com

Duly Authorized Representative Contact

Person TCEQ should contact for questions about this application	
Select existing DAR contact or enter a new contact.	MICHAEL CRAWFORD(ET GATHERING & ...)
Organization Name	ET GATHERING & PROCESSING LLC
Prefix	MR
First	MICHAEL
Middle	
Last	CRAWFORD
Suffix	
Credentials	
Title	DIRECTOR OF OPERATIONS
Enter new address or copy one from list	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	1706 S MIDKIFF RD
Routing (such as Mail Code, Dept., or Attn:)	
City	MIDLAND
State	TX
Zip	79701
Phone (###-###-####)	4324382509
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	michael.crawford@energytransfer.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	Energy Transfer LP
Prefix	MS
First	Alena
Middle	
Last	Miro
Suffix	
Credentials	
Title	Senior Manager - Environmental
Enter new address or copy one from list:	
Mailing Address	
Address Type	Domestic
Mailing Address (include Suite or Bldg. here, if applicable)	2564 PECOS HWY
Routing (such as Mail Code, Dept., or Attn:)	
City	CARLSBAD
State	NM
ZIP	88220
Phone (###-###-####)	7138656825
Extension	
Alternate Phone (###-###-####)	
Fax (###-###-####)	
E-mail	alena.miro@energytransfer.com

Title V General Information - Existing

1) Permit Type:	SOP
2) Permit Latitude Coordinate:	31 Deg 31 Min 33 Sec
3) Permit Longitude Coordinate:	103 Deg 28 Min 3 Sec
4) Is this submittal a new application or an update to an existing application?	New Application
4.1. What type of permitting action are you applying for?	Streamlined Revision
4.1.1. Are there any permits that should be voided upon issuance of this permit application through permit conversion?	No
4.1.2. Are there any permits that should be voided upon issuance of this permit application through permit consolidation?	No
5) Who will electronically sign this Title V application?	Duly Authorized Representative

6) Does this application include Acid Rain Program or Cross-State Air Pollution Rule requirements?	No

Title V Attachments Existing

Attach OP-1 (Site Information Summary)

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

[File Properties]

File Name	OP-2.pdf
Hash	0C8656E6ADC52E650C33BD13A7A7099499CB501AE3522BE3DE63EF8AE6E7BA6B
MIME-Type	application/pdf

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

Attach OP-REQ2 (Negative Applicable Requirement Determinations)

Attach OP-REQ3 (Applicable Requirements Summary)

[File Properties]

File Name	OP-REQ3.pdf
Hash	CF2AC6D78608912C661BD3CEA089DF5823CBE2EBFC05F851B3A0342CD6C6C7BE
MIME-Type	application/pdf

Attach OP-PBRSUP (Permits by Rule Supplemental Table)

Attach OP-SUMR (Individual Unit Summary for Revisions)

[File Properties]

File Name	OP-SUMR.pdf
Hash	0392A0470B13A1821FE57B50922251FE97C31A4EF6E298CB1EBFB28739062BF4
MIME-Type	application/pdf

Attach OP-MON (Monitoring Requirements)

Attach OP-UA (Unit Attribute) Forms

[File Properties]

File Name	OP-UA1.pdf
Hash	A25CA12793D3BD126DB65BC2014E64EC252D71C5A6F3FBBECB6FF16C77F99324
MIME-Type	application/pdf

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

Attach OP-CRO2 (Change of Responsible Official Information)

Attach OP-DEL (Delegation of Responsible Official)

Attach any other necessary information needed to complete the permit.

[File Properties]

File Name	Full Mi Vida.pdf
Hash	790560FC8C55EB60C497211F38D9F000CC0A59962B8C8E0BFF93F3A32A5403D8
MIME-Type	application/pdf

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

[File Properties]

File Name	AMOC-218.pdf
Hash	0A57AD1A953ED41136A9C3EC271A9E25DB437980B9D624390C7F8EBD621BCD4E
MIME-Type	application/pdf

Expedite Title V

1) Per Texas Health and Safety Code, Section 382.05155, does the applicant want to expedite the processing of this application?	No

Certification

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

1. I am Michael B Crawford, the owner of the STEERS account ER011066.
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 3186.
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: Michael B Crawford OWNER OPERATOR

Account Number:	ER011066
Signature IP Address:	63.105.50.19
Signature Date:	2025-09-16
Signature Hash:	64AD83382D49A242894986D1728758745B7CD1B7705E0837CFD6298D2482C371
Form Hash Code at time of Signature:	BCA4C63BAFC3CA970DE2804A9CE8AE72018ACA9A8F4A3D40F921838B8310DD4D

Submission

Reference Number:	The application reference number is 817699
Submitted by:	The application was submitted by ER011066/Michael B Crawford
Submitted Timestamp:	The application was submitted on 2025-09-16 at 11:13:44 CDT
Submitted From:	The application was submitted from IP address 63.105.50.19
Confirmation Number:	The confirmation number is 678465
Steers Version:	The STEERS version is 6.92
Permit Number:	The permit number is 3186

Additional Information

Application Creator: This account was created by Kaylon Gilbert

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2025

MR TOBY CLARK
VICE PRESIDENT OPERATIONS
ET GATHERING & PROCESSING LLC
600 N MARIENFIELD ST, SUITE 700
MIDLAND TX 79701-

Re: Alternative Method of Compliance (AMOC) No. 218
Standard Permit Equivalency Review
Alternative Optical Gas Imaging Leak Detection and Repair
Customer Reference Number: CN606187110
Associated Permit Numbers: see below

Dear Mr. Clark:

This correspondence is in response to ET Gathering & Processing LLC's (ET's) December 12, 2022 request to follow an alternative method of compliance (AMOC) for fugitive leak detection and repair (LDAR) work practices using optical gas imaging (OGI) at several oil and gas sites currently authorized by the § 116.620 Oil and Gas Production Standard Permits (§116.620) or the Non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities Effective November 8, 2012 (NRSP).

We understand ET has requested the ability for designated sites to follow the OGI LDAR requirements of 40 CR 60 Subpart OOOOb Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after December 6, 2022 (NSPS OOOOb) and Appendix K Determination of Volatile Organic Compound and Greenhouse Gas Leaks Using Optical Gas Imaging (Appendix K) instead of the specific conditions for fugitive LDAR monitoring using traditional Method 21 and LDAR work practices as required in §116.620 or the NRSP. In some cases, facilities are subject to NSPS OOOOb, at other sites following this alternative would be voluntary.

The Texas Commission on Environmental Quality (TCEQ) Executive Director has made a final decision to approve your AMOC request using the authority under §116.615(7) *Equivalency* review process. The sites listed below are covered by this AMOC and may follow the attached Conditions for the use of OGI LDAR for compliance. You are reminded that approval of any AMOC shall not abrogate the Executive Director or Administrator's authority or in any way prohibit later canceling the AMOC. By copy of this letter, we are informing the Environmental Protection Agency, Region 6.

This AMOC approval may supersede certain requirements or representations in the referenced Standard Permit registrations. To ensure effective and consistent enforceability, we request that ET incorporate this AMOC into the registrations through a hard-copy submittal of a Revision. This revision should be sent directly to the Air Permits Division and any appropriate TCEQ Regional office or local air pollution control program no later than 90 days after this approval, if being used at a site. That notification shall include all supporting, site-specific documentation.

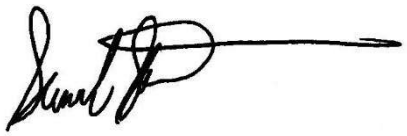
This approval may also change applicable requirements for the site, which are identified in the site operating permits (SOPs) listed. The TCEQ recommends the submittal of an SOP administrative revision if any changes are necessary. Changes meeting the criteria for an administrative revision can be operated before issuance of the revision if a complete application is submitted to the TCEQ and this information is maintained with the SOP records at the site.

Re: AMOC 218

Site Name	Regulated Entity No.	City, County (TCEQ Region)	Standard Permit No.	SOP No.
Tippett Gas Plant	RN100217843	McCamey, Crockett TCEQ Region 8	§116.620 #107048	O3190
Panther Gas Plant	RN109124057	Rankin, Upton TCEQ Region 7	§116.620 # 139259	O4448
Rebel Gas Plant	RN106934664	Garden City, Glasscock TCEQ Region 7	§116.620 # 114311	O4459
Halley Gas Plant	RN100218916	Kermit, Winkler TCEQ Region 7	NRSP #109262	O3254
Mi Vida Treatment Plant	RN100215532	Barstow, Ward TCEQ Region 7	§116.620 #113099	O3185
Bear Gas Processing Plant	RN111529814	Orla, Reeves TCEQ Region 7	§116.620 #169564	O4446
Grey Wolf Gas Plant	RN111436614	Wink, Winkler TCEQ Region 7	§116.620 #168018	O4447
Badger Gas Plant	RN112007323	Orla, Culberson TCEQ Region 6	§116.620 #176888	O4749

If you need further information or have any questions, please contact Ms. Anne Inman, P.E. at (512) 239-1276 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



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

cc: Alena Miro, Environmental Manager, Energy Transfer
Stephanie Pina, Sr Engineer, WTX – Operations
Elizabeth McGurk, Montrose Environmental
Air Section Manager, Region 6 – El Paso
Air Section Manager, Region 7 - Midland
Air Section Manager, Region 8 - San Angelo
Michael Partee, Manager, Rule Registrations Section, Air Permits Division, OA: MC-163
Rhyan Stone, Manager, Operating Permits Section, Air Permits Division, OA: MC-163
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental Protection Agency, Region 6, Dallas

Project Number: 351877

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Alternative Method of Control (AMOC) Plan, AMOC Number: AMOC-218
ET Gathering and Processing, LLC (ET)
Customer Identification Number CN606187110
Alternative Fugitive Leak Detection and Repair (LDAR) Program

I. This AMOC Plan Authorization shall apply at the following ET Gathering and Processing, LLC (ET) sites:

Site Name	Responsible Official	Regulated Entity Number	City, County (TCEQ Region)	Standard Permit	Title V Permit
Tippett Gas Plant	Chris Thompson	RN100217843	McCamey, Crockett (Region 8)	§116.620 SP # 107048	O3190
Panther Gas Plant	Andrew Mann	RN109124057	Rankin, Upton (Region 7)	§116.620 SP # 139259	O4448
Rebel Gas Plant	Andrew Mann	RN106934664	Garden City, Glasscock (Region 7)	§116.620 SP # 114311	O4459
Halley Gas Plant	Chris Thompson	RN100218916	Kermit, Winkler (Region 7)	NRSP SP #109262	O3099
Mi Vida Treatment Plant	Chris Thompson	RN100215532	Barstow, Ward (Region 7)	§116.620 #113099	O3185
Bear Gas Processing Plant	Chris Thompson	RN111529814	Orla, Reeves (Region 7)	§116.620 #169564	O4446
Grey Wolf Gas Plant	Chris Thompson	RN111436614	Wink, Winkler (Region 7)	§116.620 #168018	O4447
Badger Gas Plant	Chris Thompson	RN112007323	Orla, Culberson (Region 6)	§116.620 #176888	O4749

II. A copy of the AMOC application and the AMOC Plan provisions must be kept on-site or at a centralized location and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any pollution control agency with jurisdiction. This AMOC authorization is defined by the application received December 12, 2022, and supporting documentation submitted through August 20, 2025.

III. This authorization is granted under § 116.617 for emissions sources regulated by 30 Texas Administrative Code (TAC) Chapter 116, Subchapter F, Standard Permits:

- §116.620 Installation and/or Modification of Oil and Gas Facilities (§ 116.620), and/or
- Non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities (NRSP).

This AMOC shall apply in lieu of the requirements in these state authorization conditions, as applicable. Compliance with this AMOC is independent of the regulated entity's obligation to comply with all other applicable requirements of 30 TAC Chapters, TCEQ permits, and applicable state and federal laws. Compliance with the requirements of this plan does not assure compliance with requirements of an applicable New Source Performance Standard (NSPS), National Emission Standard for Hazardous Air Pollutants (NESHAPs), or an Alternative Means of Emission Limitation (AMEL) and does not constitute approval of alternative standards for these regulations.

IV. In accordance with 30 TAC § 116.615(2), all representations submitted for these standard permit authorized facilities and this AMOC, as well as the provisions listed here, become conditions upon which this AMOC Plan is issued. It is unlawful to vary from the emission limits, control requirements, monitoring, testing, reporting or recordkeeping requirements of this Plan.

V. For sites authorized by §116.620, the requirements in Condition No. 6 apply to fugitive emissions components for leak detection and repair (LDAR) and supersedes the requirements in 30 TAC § 116.620(c) and (d)(1).

For sites authorized by the NRSP, the requirements in Condition No. 6 apply to fugitive emissions components for LDAR and supersedes the requirements in Standard Permit (d)(1)(A), (e)(6), and relevant fugitive LDAR portions of Tables 7, 8, and 9.

VI. The following requirements may be applied to fugitive emissions components affected facilities to reduce fugitive emissions of methane and volatile organic compounds (VOC) on a voluntary basis, and has been determined to be equivalent to the LDAR referenced paragraph V. If the company opts to revert to the previous LDAR Program referenced above, the TCEQ Region Office must be notified and associated records and reports updated.

This condition must be met for each fugitive component as listed and represented in the AMOC revised application dated March 10, 2025, through August 20, 2025. Compliance must be achieved as soon as practicable but no later than 90 days from the issuance date of this AMOC or start-up of associated facilities.

A. <u>General Requirements and Applicability.</u>

1. The following are applicable to this condition:

   i. All process unit equipment fugitive components at an onshore natural gas processing plant including each pump, pressure relief device, open-ended valve or line, valve, and flange or other connector that has the potential to emit methane or VOC and any device or system required by this condition.

   ii. "No detectable emissions" or a "leak" is defined by ≥ 500 ppmv using a FID-based or catalytic combustion-based instrument for valves and connectors and ≥ 2,000 ppmv for pumps following the requirements in 40 CFR 60, Appendix A-7, Method 21 (Method 21). The instrument shall be calibrated before use each day of use by the procedures specified and using zero air and a mixture of methane or n-hexane and air at a concentration no more than 2,000 ppmv.

   iii. Alternatively, a "leak" is defined as any emissions observed using an optical gas imaging (OGI) camera. Any OGI monitoring must follow 40 CFR 60, Appendix K "Determination of Volatile Organic Compound and Greenhouse Gas Leaks Using Optical Gas Imaging".

   iv. Equipment is in light liquid service when all the following conditions apply based on representative samples of the process fluid that is contained in or contacts the equipment, or gas being combusted in a flare. Standard reference texts or ASTM D2879-83, -96, or -97 shall be used to determine vapor pressures.

      a. The vapor pressure of one or more of the organic components is greater than 0.3 kPa at 20 °C (1.2 in H_2O at 68 °F);

      b. The total concentration of the pure organic components having a vapor pressure greater than 0.3 kPa at 20 °C (1.2 in H_2O at 68 °F) is equal to or greater than 20 percent by weight;

      c. The fluid is a liquid at operating conditions; or

      d. If the weight percent evaporated is greater than 10 percent at 150 degrees Celsius (302 degrees Fahrenheit) as determined by ASTM D86-96.

   v. Each piece of equipment or component is presumed to have the potential to emit methane or VOC unless an owner or operator demonstrates otherwise. For a piece of equipment to be considered not to have the potential to emit methane or VOC, the methane and VOC content of a gaseous stream must be below detection limits using Method 18 of 40 CFR 60 Appendix A-6. Alternatively, if the piece of equipment is in wet gas service, methane and VOC content of the stream may be determined by being below the detection limit of the methods described in ASTM E168-16(R2023), E169-16(R2022), or E260-96.

2. The following are exempt from this condition:

   i. Pumps in light liquid service, pressure relief devices in gas/vapor service, valves in gas/vapor and light liquid service, and connectors in gas/vapor service and in light liquid service that are located at a non-fractionating plant with a design capacity less than 10 million standard cubic feet per day (10 MMscfd) of field gas are exempt from:

      a. Bi-monthly OGI monitoring requirements as required under paragraph (B)(1)(i) of this condition; or

b. Routine Method 21 monitoring requirements as required under paragraph (B)(2) of this condition.

ii. Equipment that is in vacuum service, except connectors in gas/vapor and light liquid service, is excluded from the requirements of this condition if identified in all initial and subsequent reports.

iii. Equipment designated as having the potential to emit methane or VOC less than 300 hr/yr is excluded from the requirements of this condition if it meets any of the conditions specified below:

a. The equipment has the potential to emit methane or VOC only during startup and shutdown.

b. The equipment is backup equipment that has the potential to emit methane or VOC only when the primary equipment is out of service.

3. The following process unit equipment fugitive components at a natural gas processing plant must comply with this condition:

i. Pressure relief devices (PRDs) in gas/vapor service;

ii. Valves in gas/vapor service or light liquid service;

iii. Connectors in gas/vapor service or light liquid service;

iv. Pumps in light liquid service;

v. PRDs in light liquid service;

vi. Pumps, valves, connectors, and PRDs in heavy liquid service.

vii. Open-ended valves or lines; and

viii. Closed vent systems and control devices used to comply with any equipment leak provisions

4. New and Reworked Equipment. The following requirements apply to all equipment, as applicable:

i. Construction of new and reworked piping, valves, pump systems, and compressor systems shall conform to applicable American National Standards Institute (ANSI), American Petroleum Institute (API), American Society of Mechanical Engineers (ASME), or equivalent codes.

ii. New and reworked underground process pipelines shall contain no buried valves such that fugitive emission monitoring is rendered impractical. New and reworked buried connectors shall be welded.

iii. To the extent that good engineering practice will permit, new and reworked valves and piping connections shall be so located to be reasonably accessible for leak-checking during plant operation.

iv. New and reworked piping connections shall be welded or flanged. Screwed connections are permissible only on piping smaller than two-inch diameter. Gas or hydraulic testing of the new and reworked piping connections at no less than operating pressure shall be performed prior to returning the components to service or they shall be monitored for leaks using an approved gas analyzer method within 15 days of the components being returned to service. Adjustments shall be made as necessary to obtain leak-free performance.

5. UTM, DTM, and Open-Ended Valves or Lines

i. Components that are considered inaccessible (e.g., insulated components), difficult-to-monitor (DTM), or unsafe-to-monitor (UTM) when using a Method 21 instrument shall be monitored with the OGI as long as such components are not considered DTM or UTM when using an OGI. All such components shall be included in company records and reporting.

ii. A DTM valve or line is a component that cannot be inspected without elevating the monitoring personnel more than two meters above a permanent support surface or that requires a permit for confined space entry as defined in 29 CFR §1910.146 or 30 TAC §115.352(7). For natural gas processing plants, less than 3.0 % of the total number of fugitive components may be designated as DTM.

iii. An UTM component is designated if monitoring personnel would be exposed to an immediate danger as a consequence of conducting the monitoring. Any fugitive component that is designated as UTM is exempt from routine monitoring if the monitoring plan requires monitoring as frequently as practicable during safe-to-monitor times (but not more frequently than the periodic monitoring schedule otherwise applicable).

iv. All DTM or UTM components shall be evaluated for accessibility to complete repairs. Records of these evaluations shall be developed and maintained by the facility. If a leak is detected, the equipment must be repaired according to the procedures in paragraph (C) of this condition.

v. Each open-ended valve or line must be designed, operated, and comply with the following:

a. Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve, except as provided in subparagraphs (e) and (f). The cap, blind flange, plug, or second valve must seal the open end of the valve or line at all times except during operations requiring process fluid flow through the open-ended valve or line.

b. If evidence of a leak is found at any time by AVO, or any other detection method, a leak is detected.

c. Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

d. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall remain closed at all other times.

e. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of this condition.

f. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block-and-bleed system are exempt from the requirements of this condition.

B. ***Operational And Emissions Limits*.**

1. **Conduct OGI Surveys**: Comply with the following. If any leaks are detected, repairs and re-monitoring must follow paragraph C of this condition.

i. Conduct bimonthly monitoring surveys of all equipment fugitive components using OGI. Each fugitive component shall be observed or monitored during each monitoring survey.

ii. All pumps in light liquid service must be monitored per the following:

a. Conduct weekly visual inspections for indications of liquids dripping from the pump seal.

b. If there are indications of liquids dripping from the pump seal, either repair the leak or monitor the pump within 5 calendar days using OGI or Method 21. Any pump seal leak observed by OGI or measured by Method 21 ≥ 2000 ppmv must be repaired following paragraph C. Any pump equipped with a CVS is exempt from visual inspection requirements.

iii. PRDs in gas/vapor service must be monitored within 5 calendar days after each pressure release to detect leaks using OGI or Method 21 unless the exceptions below are met. Any leak observed using OGI or ≥ 500 ppmv by Method 21 must be repaired.

a. Any pressure relief device that is located in a non-fractionating plant that is monitored only by non-plant personnel may be monitored after a pressure release the next time the monitoring personnel are onsite or within 30 calendar days after a pressure release, whichever is sooner, instead of within 5 calendar days as specified. No pressure relief device described in this paragraph may be allowed to operate for more than 30 calendar days after a pressure release without monitoring.

b. Any pressure relief device that is routed to a CVS is exempt from these requirements.

iv. For PRDs in light liquid service and pumps, valves, connectors, and PRDs in heavy liquid service, if evidence of a potential leak is found at any time by AVO or any other detection method, the equipment must be repaired.

v. Any fugitive component routed to a closed vent system (CVS) and vented to a control, process, or fuel gas system must comply be designed and operated with no identifiable fugitive emissions and meet the following:

a. For each joint, seam, or other connection that is permanently or semi-permanently sealed (*e.g.,* a welded joint between two sections of hard piping or a bolted and gasketed ducting flange), conduct an initial inspection to demonstrate no identifiable emissions within the first 30 days after startup of the system.

b. Conduct annual AVO inspections for defects that can result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps in ductwork; loose connections; liquid leaks; or broken or missing caps or other closure devices.

c. Following any time a component or connection is unsealed for repair or replacement. Monitor a component or connection using the test methods and procedures in this condition to demonstrate that it operates with no identifiable emissions.

d. Any CVS, process, or control device bypass device must meet the following:

I. Set the flow indicator to take a reading at least once every 15 minutes at the inlet to the bypass device that could divert the stream away from the control device and to the atmosphere.

II. If the bypass device valve installed at the inlet to the bypass device is secured in the non-diverting position using a car-seal or a lock-and-key type configuration, visually inspect the seal or closure mechanism at least once every month to verify that the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass device.

2. Alternative Method 21 Surveys. An owner or operator may choose to comply with all of the following requirements instead of the requirements in paragraph (B)(1) above. If any leaks are detected, repairs and re-monitoring must follow paragraph C of this condition.

i. Each pump in light liquid service must be monitored per the following, except as provided in subparagraphs (c)-(f) below.

a. Each pump must be monitored monthly by Method 21 to detect leaks. A leak is defined as an instrument reading of 2,000 ppmv or greater.

b. Conduct weekly visual inspections for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, either repair the leak or monitor the pump within 5 calendar days using OGI or Method 21. Any pump seal leak observed by OGI or measured by Method 21 ≥ 2,000 ppmv must be repaired.

c. Any pump is equipped with a CVS that complies is exempt from monitoring and visual inspection requirements.

d. Any pump that is designated as UTM that meets this condition is exempt.

e. Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt, provided all the following requirements are met:

I. Each dual mechanical seal system is operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equipped with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a CVS to a control device; or equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

II. The barrier fluid system is in heavy liquid service or does not have the potential to emit methane or VOC.

III. Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both.

IV. Each pump is checked according to the requirements in subparagraphs (a)-(b) above.

V. Each sensor where each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both, is checked daily or is equipped with an audible alarm. Based on design considerations and operating experience, criterion that indicates failure of the seal system, the barrier fluid system, or both is established. If the sensor indicates failure of the seal system, the barrier fluid system, or both, a leak is detected.

f. Any pump that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background, is exempt from the requirements in subparagraphs (a)-(b) if the pump:

I. Has no externally actuated shaft penetrating the pump housing; and

II. Is demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background as determined by Method 21 initially upon designation, annually, and at other times requested by the Administrator.

g. Any pump that is designated as an UTM pump is exempt.

ii. For each pressure relief device (PRD) in gas/vapor service, comply with the following:

a. Monitor each pressure relief device quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater above background.

b. In addition, after each pressure release, monitor each pressure relief device within 5 calendar days to detect leaks using or Method 21 unless the device is located in a non-fractionating plant that is monitored only by non-plant personnel which may be monitored after a pressure release the next time the monitoring personnel are onsite or within 30 calendar days after a pressure release, whichever is sooner. No pressure relief device may be allowed to operate for more than 30 calendar days after a pressure release without monitoring.

c. Any pressure relief device that is routed to a process or fuel gas system or equipped with a CVS to a control device must comply with the applicable requirements of this condition.

d. Pressure relief devices equipped with a rupture disk are exempt from fugitive monitoring requirements provided a new rupture disk is installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in the delay of repair criteria in paragraph (C).

iii. Each open-ended valve or line must be equipped with a cap, blind flange, plug, or a second valve, except as provided in (d) or (e) of this paragraph. The cap, blind flange, plug, or second valve must seal the open end of the valve or line at all times except during operations requiring process fluid flow through the open-ended valve or line.

a. If evidence of a leak is found at any time by AVO, or any other detection method, a leak is detected and must be repaired in accordance with this condition. A leak is defined as an instrument reading of 500 ppmv or greater if Method 21 of appendix A-7 to this part is used.

b. Each open-ended valve or line equipped with a second valve must be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

c. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall remain closed at all other times.

d. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of this paragraph.

e. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block-and-bleed system are exempt from the requirements of this section.

iv. Each valve in gas/vapor or light liquid service must be monitored quarterly using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater. A valve that begins operation in gas/vapor service or in light liquid service after the initial startup date for the process unit must be monitored for the first time within 90 days after the end of its startup period to ensure proper installation, except for a valve that replaces a leaking valve, or is designated as UTM, DTM, or no detectable emissions.

v. For each pump, valve, and connector in heavy liquid service and pressure relief device in light liquid or heavy liquid service, if evidence of a potential leak is found at any time by AVO, or any other detection method, comply with one of the following:

a. Monitor the equipment within 5 calendar days by OGI or Method 21 and repair any leaks detected according to paragraph C of this condition. An instrument reading of 10,000 ppmv or greater is defined as a leak.

b. Designate the AVO, or other indication of a leak, as a leak and repair the leak according to paragraph C of this condition.

vi. All connectors in gas/vapor service and in light liquid service in the process unit shall be monitored within 12 months of the start-up of the process unit (initially) and annually using Method 21. A leak is defined as an instrument reading of 500 ppmv or greater.

a. Any connector that is designated as an UTM connector is exempt.

b. DTM (inaccessible), ceramic, or ceramic-line connectors are exempt from this condition. If any inaccessible, ceramic, or ceramic-lined connector is observed by AVO or other means to be leaking, the indications of a leak to the atmosphere by AVO or other means must be eliminated as soon as practicable. Inaccessible connectors meet any of the following:

I. Buried.

II. Insulated in a manner that prevents access to the connector by a monitor probe.

III. Obstructed by equipment or piping that prevents access to the connector by a monitor probe.

IV. Unable to be reached from a wheeled scissor-lift or hydraulic-type scaffold that would allow access to connectors up to 7.6 meters (25 feet) above the ground.

V. Inaccessible because it would require elevating monitoring personnel more than 2 meters (7 feet) above a permanent support surface or would require the erection of scaffold.

VI. Not able to be accessed at any time in a safe manner to perform monitoring. Unsafe access includes, but is not limited to, the use of a wheeled scissor-lift on unstable or uneven terrain, the use of a motorized man-lift basket in areas where an ignition potential exists, or access would require near proximity to hazards such as electrical lines or would risk damage to equipment.

c. Connectors which are part of an instrumentation systems, and inaccessible, ceramic, or ceramic-lined connectors are not subject to the recordkeeping requirements of this condition.

C. **Repairs and Re-monitoring**. When a leak is detected, comply with the following repair and re-monitoring requirements:

1. A weatherproof and readily visible identification tag, marked with the equipment identification number, must be attached to the leaking equipment. The identification tag on equipment may be removed after it has been repaired.

2. A first attempt at repair must be made as soon as practicable, but no later than 5 calendar days after the leak is detected.

A first attempt at repair is not required if the leak is detected using OGI and the equipment identified as leaking would require elevating the repair personnel more than 2 meters above a support surface.

i. First attempts at repair for pumps in light liquid or heavy liquid service include, but are not limited to, tightening the packing gland nuts and ensuring that the seal flush is operating at design pressure and temperature, where practicable.

ii. Beginning January 22, 2027, or 180 days from start up, whichever is later, for each valve where a leak is detected, you must comply with the following:

a. Repack the existing valve with a low-e packing (valve packing product for which the manufacturer has issued a written warranty or performance guarantee that it will not emit fugitives at greater than 100 ppm in the first five years. Low-e injectable packing is a type of low-e packing product for which the manufacturer has also issued a written warranty or performance guarantee and that can be injected into a valve during a “drill-and-tap” repair of the valve);

b. Replace the existing valve with a low-e valve (valves, including its specific packing assembly, for which the manufacturer has issued a written warranty or performance guarantee that it will not emit fugitives at greater than 100 ppm in the first five years. A valve may qualify as a low-e valve if it is as an extension of another valve that has qualified as a low-e valve); or

c. Perform a drill and tap repair with a low-e injectable packing.

d. An owner or operator is not required to utilize a low-e valve or low-e packing to replace or repack a valve if the owner or operator demonstrates that a low-e valve or low-e packing is not technically feasible. Low-e valve or low-e packing that is not suitable for its intended use is considered to be technically infeasible. Factors that may be considered in determining technical

infeasibility include: retrofit requirements for installation (*e.g.,* re-piping or space limitation), commercial unavailability for valve type, or certain instrumentation assemblies.

3. Repair of leaking equipment must be completed within 15 calendar days after detection of each leak, except as provided in subparagraphs (4)-(6).
4. If the repair for visual indications of liquids dripping for pumps in light liquid service can be made by eliminating visual indications of liquids dripping, you must make the repair within 5 calendar days of detection.
5. If the repair for AVO or other indication of a leak for open-ended valves or lines; pumps, valves, or connectors in heavy liquid service; or pressure relief devices in light liquid or heavy liquid service can be made by eliminating the AVO, or other indication of a potential leak, you must make the repair within 5 calendar days of detection.
6. Delay of repair of equipment for which leaks have been detected is allowed if repair within 15 days is technically infeasible without a process unit shutdown or as specified in (i) – (v) below. Repair of this equipment shall occur before the end of the next process unit shutdown. Monitoring to verify repair must occur within 15 days after startup of the process unit.
    i. Delay of repair of equipment is allowed for equipment which is isolated from the process, and which does not have the potential to emit methane or VOC.
    ii. Delay of repair for valves and connectors is allowed if the following conditions are met.
        a. Demonstrate that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
        b. When repair procedures are conducted, the purged material is collected and destroyed or recovered in a control device meeting these conditions.
    iii. Delay of repair for pumps is allowed if the following conditions are met.
        a. Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
        b. Repair is completed as soon as practicable, but not later than 6 months after the leak was detected.
    iv. If delay of repair is required to repack or replace the valve. Delay of repair beyond a process unit shutdown is allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.
    v. When delay of repair is allowed for a leaking pump, valve, or connector that remains in service, the pump, valve, or connector may be considered to be repaired and no longer subject to delay of repair requirements if two consecutive bimonthly monitoring results show no leak remains.

D. **Initial Compliance**

1. Submit initial notifications as required by the following:
    i. A notification of the date construction or reconstruction of an affected facility is commenced postmarked no later than 30 days after such date.
    ii. If a new or reconstructed facility, a notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
    iii. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which this permit applies. This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. TCEQ may request additional relevant information subsequent to this notice.
    iv. If an existing plant proposes to replace components, and the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new plant's components, the owner or operator shall notify the TCEQ of the

proposed replacements. The notice must be postmarked 60 days (or as soon as practicable) before construction of the replacements is commenced, and must include the following information:

a. Name and address of the owner or operator.

b. The location of the existing facility.

c. A brief description of the existing facility and the components which are to be replaced.

d. A description of the existing air pollution control equipment and the proposed air pollution control equipment.

e. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new facility.

f. The estimated life of the existing facility after the replacements.

g. A discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.

2. Within 90 days of the startup of production for each new / modified fugitive emissions component demonstrate and document the following, as applicable:

i. Conduct initial monitoring for all fugitive component types.

ii. Conduct monitoring for each pump in light liquid service, pressure relief device in gas/vapor service, valve in gas/vapor or light liquid service, connector in gas/vapor or light liquid service as required and document.

iii. Comply with the equipment requirements for each open-ended valve or line as required and document.

iv. For each pump equipped with a dual mechanical seal system that degasses the barrier fluid reservoir to a process or a control device, each pump which captures and transports leakage from the seal or seals to a process or a control device, or each pressure relief device which captures and transports leakage through the pressure relief device to a process or a control device, document meeting the following requirements:

a. Reduce methane and VOC emissions by 95.0 percent or greater (≥ 95.0 %) and document performance demonstration or route to a process.

b. Install a CVS to capture all emissions from each pump equipped with a dual mechanical seal system that degasses the barrier fluid reservoir, each pump which captures and transports leakage from the seal or seals, or each pressure relief device which captures and transports leakage through the pressure relief device and route all emissions to a process or to a control device.

c. If routing to a control device, conduct an initial performance test or install a control device with TCEQ-approved manufacturer's testing.

d. Conduct the initial inspections of the CVS and system(s) bypasses, if applicable.

e. Install, calibrate, operate and maintain continuous monitoring and recording devices to measure appropriate control device operating parameters.

I. Continuous parameter monitoring systems used to detect the presence of a pilot or combustion flame must record a reading at least once every 5 minutes. Heat sensing monitoring devices that indicate the continuous ignition of a pilot or combustion flame are exempt from the calibration, quality assurance and quality control requirements of this condition. All non-pilot/flame continuous parameter monitoring systems must measure data values at least once every hour, record each measured value, and calculate the 1-hour block average values (or shorter periods) from all measured data values during each time period for each parameter.

II. Prepare a monitoring plan that covers each control device which address the monitoring system design, data collection, quality assurance, and quality control elements (including, not limited to, sample interface type and location which provides representative measurements, detector signal analyzer, data acquisition, calculations, equipment performance checks, system accuracy audits or other audit procedures, ongoing operation and maintenance procedures, and all associated records). Install, calibrate, operate, and

maintain each continuous parameter monitoring system in accordance with the procedures in the monitoring plan.

III. Conduct the continuous parameter monitoring system equipment performance checks, system accuracy audits, or other audit procedures specified in the monitoring plan at least once every 12 months.

v. Tag and repair each identified leak as required in paragraph (C).

3. Submit any required site monitoring plans and an initial semiannual report for each fugitive emissions component no later than 90 days after the end of the initial compliance period specified in subparagraph (2) above. Submit all reports through CEDRI for 40 CFR 60, Subpart OOOOb. Include the following information:

i. Company name, facility site name, and address of the affected facility. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report".

ii. Beginning and ending dates of the reporting period.

iii. A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. If the report is submitted via CEDRI, the certifier's electronic signature must be included.

iv. For each process unit: identification number/name; and number of valves, pumps, connectors, and PRDs subject to the monitoring required in this condition, indicating light or heavy service.

v. For each month during the semiannual reporting period for each process unit: the number of valves, pumps, connectors, PRDs, and open-ended valves or lines for which leaks were detected; the number of any component(s) for which leaks were not repaired as required by this condition; and the facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible.

vi. Dates of process unit shutdowns which occurred within the semiannual reporting period.

vii. For any CVS or control device, manufacturer's written operating instructions, procedures, operating envelopes, and any performance tests. Maintain detailed records of inspections, identified leaks, repairs, maintenance, pilots, gas flow rates, and parametric monitoring, as applicable.

E. ***Continuous Compliance.*** At a minimum, demonstrate on-going compliance with the following for each fugitive component:

1. Conduct initial and periodic monitoring surveys as required by this condition.

2. Tag and repair each identified source of fugitive emissions as required paragraph (C) of this condition.

3. Submit semiannual and annual reports. All reports must contain the information required in subparagraphs (D)(1)-(3), as applicable. If changes have occurred since the previous report, include revisions to applicable items and subsequent compliance demonstrations. Include updates to any fugitive monitoring.

F. ***Records.*** At a minimum, meet the following for compliance demonstrations:

1. All records must be maintained either onsite or at the nearest local field office for at least 5 years and made available upon request.

2. Any records that are submitted electronically via EPA's CEDRI may be maintained in electronic format. The CEDRI "State Facility ID" field must be completed with the assigned TCEQ RN for each site and the CEDRI "Report Type" should be indicated as "State Report". The ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to EPA, TCEQ, or any local air pollution control program with jurisdiction as part of an on-site compliance evaluation.

3. Maintain a file of: all measurements and surveys, including OGI, Method 21, continuous monitoring systems, monitoring devices, and performance testing measurements; all survey and monitoring system performance evaluations; all device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by these conditions recorded in a permanent form suitable for inspection.

4. For any CVS or control device, manufacturer's written operating instructions, procedures, operating envelopes, and any performance tests. Maintain detailed records of inspections, identified leaks, repairs, maintenance, pilots, gas flow rates, and parametric monitoring, as applicable.
5. For any bypass, maintain a record of the following, as applicable: readings from the flow indicator; each inspection of the seal or closure mechanism; the date and time of each instance the key is checked out; date and time of each instance the alarm is sounded.
6. Equipment exempted or excluded from these conditions shall be identified in a list or by one of the methods described below to be made readily available upon request and may be identified by one or more of the following methods:
    i. piping and instrumentation diagram (PID);
    ii. a written or electronic database or electronic file;
    iii. color coding;
    iv. a form of weatherproof identification; or
    v. designation of exempted process unit boundaries.