

Executive Summary – Enforcement Matter – Case No. 61726
ETC Texas Pipeline, Ltd.
RN107716664
Docket No. 2021-1645-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

No

Location(s) Where Violation(s) Occurred:

Alamo Gas Plant, located approximately 0.4 mile southeast of the westernmost intersection of Texas Highway 7 and County Road 3020, Crockett, Houston County

Type of Operation:

Natural gas processing plant

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: July 26, 2024

Comments Received: No

Penalty Information

Total Penalty Assessed: \$141,550

Amount Deferred for Expedited Settlement: \$28,310

Total Paid to General Revenue: \$56,620

Total Due to General Revenue: \$0

Payment Plan: N/A

Supplemental Environmental Project (“SEP”) Conditional Offset: \$56,620

Name of SEP: Texas Congress of Parents and Teachers dba Texas PTA (Third-Party Pre-Approved)

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Satisfactory

Major Source: Yes

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: January 2021

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: November 12, 2021

Date(s) of NOE(s): December 9, 2021

Executive Summary – Enforcement Matter – Case No. 61726
ETC Texas Pipeline, Ltd.
RN107716664
Docket No. 2021-1645-AIR-E

Violation Information

1. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notifications for Incident Nos. 365698 and 365699 were due by January 17, 2021 at 12:45 p.m. and January 20, 2021 at 8:50 a.m., respectively, but were not submitted until August 27, 2021 at 2:46 p.m. and 2:48 p.m., respectively [30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), Federal Operating Permit ("FOP") No. O3840/General Operating Permit ("GOP") No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
2. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notifications for 16 emissions events were not submitted within 24 hours after discovery as listed in Attachment B - Initial Notification Table [30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
3. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final records for Incident Nos. 365698 and 365699 were due by January 30, 2021 and February 3, 2021, respectively, but were not submitted until September 10, 2021 [30 TEX. ADMIN. CODE §§ 101.201(c) and 122.143(4), FOP No. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
4. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final records for 16 reportable emission events were not submitted within two weeks after the end of the emissions events as listed in Attachment C - Final Record Table [30 TEX. ADMIN. CODE §§ 101.201(c) and 122.143(4), FOP No. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
5. Failed to prevent unauthorized emissions. Specifically, the Respondent released 791.53 pounds ("lbs") of volatile organic compounds ("VOC") and 0.001 lb of hydrogen sulfide ("H₂S") from the TEG Still Vent, Emissions Point Number ("EPN") TO, during an emissions event (Incident No. 365698) that occurred on January 16, 2021 and lasted six hours and 56 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
6. Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.001 lb of H₂S and 669.76 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 365699) that began on January 19, 2021 and lasted five hours and 52 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4),

Executive Summary – Enforcement Matter – Case No. 61726
ETC Texas Pipeline, Ltd.
RN107716664
Docket No. 2021-1645-AIR-E

Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

7. Failed to prevent unauthorized emissions. Specifically, the Respondent released 362.34 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 366450) that occurred on November 20, 2018 and lasted three hours and 12 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

8. Failed to prevent unauthorized emissions. Specifically, the Respondent released 24,792.97 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366451) that began on April 17, 2019 and lasted 121 hours and three minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

9. Failed to prevent unauthorized emissions. Specifically, the Respondent released 8,346.25 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366453) that began on June 3, 2019 and lasted 40 hours and 45 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

10. Failed to prevent unauthorized emissions. Specifically, the Respondent released 7,827.38 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366454) that began on October 2, 2019 and lasted 38 hours and 13 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

11. Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,436.94 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366464) that occurred on December 29, 2019 and lasted seven hours and one minute [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

12. Failed to prevent unauthorized emissions. Specifically, the Respondent released 333.64 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366467) that occurred on March 29, 2020 and lasted two hours and 25 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Executive Summary – Enforcement Matter – Case No. 61726
ETC Texas Pipeline, Ltd.
RN107716664
Docket No. 2021-1645-AIR-E

13. Failed to prevent unauthorized emissions. Specifically, the Respondent released 510.81 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366469) that occurred on March 31, 2020 and lasted three hours and 42 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

14. Failed to prevent unauthorized emissions. Specifically, the Respondent released 750.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366470) that occurred on May 20, 2020 and lasted five hours and 26 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

15. Failed to prevent unauthorized emissions. Specifically, the Respondent released 520.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366472) that occurred on June 7, 2020 and lasted three hours and 46 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

16. Failed to prevent unauthorized emissions. Specifically, the Respondent released 687.99 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366474) that occurred on June 9, 2020 and lasted four hours and 59 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

17. Failed to prevent unauthorized emissions. Specifically, the Respondent released 476.30 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366475) that occurred on July 2, 2020 and lasted three hours and 27 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

18. Failed to prevent unauthorized emissions. Specifically, the Respondent released 694.89 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366476) that occurred on July 16, 2020 and lasted five hours and two minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

19. Failed to prevent unauthorized emissions. Specifically, the Respondent released 842.15 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366477) that occurred on September 4, 2020 and lasted six hours and six minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit

Executive Summary – Enforcement Matter – Case No. 61726
ETC Texas Pipeline, Ltd.
RN107716664
Docket No. 2021-1645-AIR-E

Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

20. Failed to prevent unauthorized emissions. Specifically, the Respondent released 687.99 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366480) that occurred on September 22, 2020 and lasted four hours and 59 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

21. Failed to prevent unauthorized emissions. Specifically, the Respondent released 303.74 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366482) that occurred on November 3, 2020 and lasted two hours and 12 minutes [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

22. Failed to prevent unauthorized emissions. Specifically, the Respondent released 276.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366485) that occurred on December 16, 2020 and lasted two hours [30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent implemented the following corrective measures:

- a. On August 27, 2021, submitted the initial notifications for Incident Nos. 365698 and 365699;
- b. On September 10, 2021, submitted the final records for Incident Nos. 365698 and 365699;
- c. On September 14, 2021, submitted the initial notifications for Incident Nos. 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485;
- d. By September 21, 2021, connected the Benzene, Toluene, Ethylene, and Xylene Line to the Emergency Flare in order to prevent the recurrence of emissions events due to the same or similar causes as Incident Nos. 365698, 365699, 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485; and

Executive Summary – Enforcement Matter – Case No. 61726
ETC Texas Pipeline, Ltd.
RN107716664
Docket No. 2021-1645-AIR-E

e. On September 22, 2021, submitted the final records for Incident Nos. 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485.

Technical Requirements:

The Order will require the Respondent to implement and complete a SEP (see SEP Attachment A).

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Yuliya Dunaway, Enforcement Division, Enforcement Team 2, MC R-13, (210) 403-4077; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

TCEQ SEP Coordinator: Stuart Beckley, SEP Coordinator, Enforcement Division, MC 219, (512) 239-3565

SEP Third-Party Administrator: Texas PTA, 408 West 11th Street, Austin, Texas 78701

Respondent: Thomas Becker, Director Environmental Compliance, ETC Texas Pipeline, Ltd., 800 East Sonterra Boulevard, San Antonio, Texas 78258

Chad Ingalls, Vice President of Operations, ETC Texas Pipeline, Ltd., 800 East Sonterra Boulevard, San Antonio, Texas 78258

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	13-Dec-2021			
	PCW	16-Jun-2024	Screening	17-Dec-2021	EPA Due

RESPONDENT/FACILITY INFORMATION					
Respondent	ETC Texas Pipeline, Ltd.				
Reg. Ent. Ref. No.	RN107716664				
Facility/Site Region	10-Beaumont	Major/Minor Source	Major		

CASE INFORMATION					
Enf./Case ID No.	61726	No. of Violations	22		
Docket No.	2021-1645-AIR-E	Order Type	1660		
Media Program(s)	Air	Government/Non-Profit	No		
Multi-Media		Enf. Coordinator	Yuliya Dunaway		
		EC's Team	Enforcement Team 2		
Admin. Penalty \$	Limit Minimum	\$0	Maximum	\$25,000	

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$149,000
---	-------------------	-----------

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History	20.0%	Adjustment	Subtotals 2, 3, & 7	\$29,800
---------------------------	-------	------------	--------------------------------	----------

Notes	Enhancement for one order containing a denial of liability.			
--------------	---	--	--	--

Culpability	No	0.0%	Enhancement	Subtotal 4	\$0
--------------------	----	------	-------------	-------------------	-----

Notes	The Respondent does not meet the culpability criteria.			
--------------	--	--	--	--

Good Faith Effort to Comply Total Adjustments	Subtotal 5	-\$37,250
--	-------------------	-----------

Economic Benefit	0.0%	Enhancement*	Subtotal 6	\$0
-------------------------	------	--------------	-------------------	-----

Total EB Amounts	\$8,250	*Capped at the Total EB \$ Amount
Estimated Cost of Compliance	\$59,000	

SUM OF SUBTOTALS 1-7	Final Subtotal	\$141,550
-----------------------------	-----------------------	-----------

OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0%	Adjustment	\$0
---	------	------------	-----

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes		Final Penalty Amount	\$141,550
--------------	--	-----------------------------	-----------

STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$141,550
-----------------------------------	-------------------------------	-----------

DEFERRAL	20.0%	Reduction	Adjustment	-\$28,310
-----------------	-------	-----------	------------	-----------

Reduces the Final Assessed Penalty by the indicated percentage.

Notes	Deferral offered for expedited settlement.		
--------------	--	--	--

PAYABLE PENALTY	\$113,240
------------------------	-----------

Screening Date 17-Dec-2021

Docket No. 2021-1645-AIR-E

PCW

Respondent ETC Texas Pipeline, Ltd.

Policy Revision 5 (January 28, 2021)

Case ID No. 61726

PCW Revision February 11, 2021

Reg. Ent. Reference No. RN107716664

Media Air

Enf. Coordinator Yuliya Dunaway

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	1	20%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 20%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for one order containing a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 20%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 20%

Screening Date 17-Dec-2021		Docket No. 2021-1645-AIR-E		PCW	
Respondent ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No. 61726		<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No. RN107716664					
Media Air					
Enf. Coordinator Yuliya Dunaway					
Violation Number 1					
Rule Cite(s)		30 Tex. Admin. Code §§ 101.201(a)(1)(B) and 122.143(4), Federal Operating Permit ("FOP") No. O3840/General Operating Permit ("GOP") No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and Tex. Health & Safety Code § 382.085(b)			
Violation Description		Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notifications for Incident Nos. 365698 and 365699 were due by January 17, 2021 at 12:45 p.m. and January 20, 2021 at 8:50 a.m., respectively, but were not submitted until August 27, 2021 at 2:46 p.m. and 2:48 p.m., respectively.			
		Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix					
OR	Release		Harm		
	Major	Moderate	Minor		
	Actual				
	Potential			Percent	0.0%
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
				x	Percent 1.0%
Matrix Notes		Less than 30% of the rule requirements were not met.			
				Adjustment	\$24,750
					\$250
>> Violation Events					
Number of Violation Events		2	222	Number of violation days	
	daily				
	weekly				
	monthly				
	quarterly				
	semiannual				
	annual				
	single event	x			
		Violation Base Penalty \$500			
		Two single events are recommended (one event for each initial notification).			
Good Faith Efforts to Comply		25.0%		Reduction	\$125
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary				
	Ordinary	x			
	N/A				
	Notes	The Respondent completed the corrective measures on August 27, 2021, prior to the Notice of Enforcement ("NOE") dated December 9, 2021.			
				Violation Subtotal	\$375
>> Economic Benefit (EB) for this violation					
>> Statutory Limit Test					
Estimated EB Amount		\$15		Violation Final Penalty Total	\$475
				This violation Final Assessed Penalty (adjusted for limits)	\$475

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	17-Jan-2021	27-Aug-2021	0.61	\$15	n/a	\$15
Notes for DELAYED costs	Estimated cost to submit the initial notifications for Incident Nos. 365698 and 365699 (\$250/initial notification x 2 initial notifications). The Date Required is the date the first initial notification was due and the Final Date is the date of compliance.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$500	TOTAL	\$15
----------------------------	-------	-------	------

Screening Date 17-Dec-2021 Respondent ETC Texas Pipeline, Ltd. Case ID No. 61726 Reg. Ent. Reference No. RN107716664 Media Air Enf. Coordinator Yuliya Dunaway		Docket No. 2021-1645-AIR-E PCW																		
		<i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>																		
Violation Number 2 Rule Cite(s) 30 Tex. Admin. Code §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and Tex. Health & Safety Code § 382.085(b)																				
Violation Description Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event. Specifically, the initial notifications for 16 emissions events were not submitted within 24 hours after discovery (see Initial Notification Table).																				
		Base Penalty \$25,000																		
>> Environmental, Property and Human Health Matrix																				
OR	<table border="1"> <tr> <td></td> <td colspan="3">Harm</td> </tr> <tr> <td>Release</td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>				Harm			Release	Major	Moderate	Minor	Actual				Potential				Percent 0.0%
		Harm																		
	Release	Major	Moderate	Minor																
Actual																				
Potential																				
>> Programmatic Matrix																				
	<table border="1"> <tr> <td></td> <td>Falsification</td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>x</td> </tr> </table>				Falsification	Major	Moderate	Minor					x	Percent 1.0%						
	Falsification	Major	Moderate	Minor																
				x																
Matrix Notes	Less than 30% of the rule requirements were not met.																			
			Adjustment \$24,750																	
				\$250																
Violation Events																				
Number of Violation Events 16		1028 Number of violation days																		
	<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td></td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td>x</td></tr> </table>	daily		weekly		monthly		quarterly		semiannual		annual		single event	x	Violation Base Penalty \$4,000				
daily																				
weekly																				
monthly																				
quarterly																				
semiannual																				
annual																				
single event	x																			
Sixteen single events are recommended (one event for each initial notification).																				
Good Faith Efforts to Comply		25.0%	Reduction \$1,000																	
	<table border="1"> <tr> <td></td> <td>Before NOE/NOV</td> <td>NOE/NOV to EDPRP/Settlement Offer</td> </tr> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td>x</td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </table>		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	Extraordinary			Ordinary	x		N/A									
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary																				
Ordinary	x																			
N/A																				
Notes	The Respondent completed the corrective measures on September 14, 2021, prior to the NOE dated December 9, 2021.																			
			Violation Subtotal \$3,000																	
Economic Benefit (EB) for this violation		Statutory Limit Test																		
Estimated EB Amount \$563		Violation Final Penalty Total \$3,800																		
This violation Final Assessed Penalty (adjusted for limits)			\$3,800																	

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$4,000	21-Nov-2018	14-Sep-2021	2.82	\$563	n/a	\$563
Notes for DELAYED costs	Estimated cost to submit the initial notifications for Incident Nos. 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485 (\$250/initial notification x 16 initial notifications). The Date Required is the date the first initial notification was due and the Final Date is the date of compliance.						

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$4,000	TOTAL	\$563
----------------------------	---------	-------	-------

Screening Date 17-Dec-2021		Docket No. 2021-1645-AIR-E		PCW	
Respondent ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No. 61726		<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No. RN107716664					
Media Air					
Enf. Coordinator Yuliya Dunaway					
Violation Number 3					
Rule Cite(s)		30 Tex. Admin. Code §§ 101.201(c) and 122.143(4), FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and Tex. Health & Safety Code § 382.085(b)			
Violation Description		Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final records for Incident Nos. 365698 and 365699 were due by January 30, 2021 and February 3, 2021, respectively, but were not submitted until September 10, 2021.			
		Base Penalty		\$25,000	

>> Environmental, Property and Human Health Matrix

OR

	Harm			
Release	Major	Moderate	Minor	
Actual				Percent 0.0%
Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
				x	Percent 1.0%

Matrix Notes

Less than 30% of the rule requirements were not met.

Adjustment \$24,750

Violation Events

Number of Violation Events

2

223

Number of violation days

daily	
weekly	
monthly	
quarterly	
semiannual	
annual	
single event	x

Violation Base Penalty \$500

Two single events are recommended (one event for each final record).

Good Faith Efforts to Comply

25.0%

Reduction

\$125

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		

Notes

The Respondent completed the corrective measures on September 10, 2021, prior to the NOE dated December 9, 2021.

Violation Subtotal \$375

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount

\$15

Violation Final Penalty Total

\$475

This violation Final Assessed Penalty (adjusted for limits)

\$475

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$500	30-Jan-2021	10-Sep-2021	0.61	\$15	n/a	\$15
Notes for DELAYED costs	Estimated cost to submit the final records for Incident Nos. 365698 and 365699 (\$250/final record x 2 final records). The Date Required is the date the first final record was due and the Final Date is the date of compliance.						

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$500	TOTAL	\$15
----------------------------	-------	-------	------

Screening Date 17-Dec-2021		Docket No. 2021-1645-AIR-E		PCW	
Respondent ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No. 61726		<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No. RN107716664					
Media Air					
Enf. Coordinator Yuliya Dunaway					
Violation Number 4					
Rule Cite(s)		30 Tex. Admin. Code §§ 101.201(c) and 122.143(4), FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and Tex. Health & Safety Code § 382.085(b)			
Violation Description		Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event. Specifically, the final records for 16 reportable emission events were not submitted within two weeks after the end of the emissions events (see Final Record Table).			
		Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix					
OR	Release		Harm		
	Major	Moderate	Minor		
	Actual				
	Potential				Percent 0.0%
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
				x	Percent 1.0%
Matrix Notes	Less than 30% of the rule requirements were not met.				
Adjustment					\$24,750
					\$250
Violation Events					
Number of Violation Events		16	1023	Number of violation days	
	daily				
	weekly				
	monthly				
	quarterly				
	semiannual				
	annual				
	single event		x	Violation Base Penalty \$4,000	
Sixteen single events are recommended (one event for each final record).					
Good Faith Efforts to Comply		25.0%		Reduction \$1,000	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer			
	Extraordinary				
	Ordinary	x			
	N/A				
	Notes	The Respondent completed the corrective measures on September 22, 2021, prior to the NOE dated December 9, 2021.			
Violation Subtotal					\$3,000
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$561	Violation Final Penalty Total		\$3,800
This violation Final Assessed Penalty (adjusted for limits)					\$3,800

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$4,000	4-Dec-2018	22-Sep-2021	2.80	\$561	n/a	\$561
Notes for DELAYED costs	Estimated cost to submit the final records for Incident Nos. 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485 (\$250 x 16 final records). The Date Required is the date the first final record was due and the Final Date is the date of compliance.						

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$4,000	TOTAL	\$561
----------------------------	---------	--------------	-------

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>	
Case ID No.	61726	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN107716664			
Media	Air			
Enf. Coordinator	Yuliya Dunaway			
Violation Number	5			
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 791.53 pounds ("lbs") of volatile organic compounds ("VOC") and 0.001 lb of hydrogen sulfide ("H2S") from the TEG Still Vent, Emissions Point Number ("EPN") TO, during an emissions event (Incident No. 365698) that occurred on January 16, 2021 and lasted six hours and 56 minutes.			
Base Penalty				\$25,000
>> Environmental, Property and Human Health Matrix				
OR	Release	Harm		
		Major	Moderate	Minor
	Actual			x
	Potential			
				Percent 30.0%
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
				Percent 0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
Adjustment				\$17,500
				\$7,500
Violation Events				
Number of Violation Events		1	1	Number of violation days
	daily			
	weekly			
	monthly	x		
	quarterly			
	semiannual			
	annual			
	single event			
Violation Base Penalty				\$7,500
One monthly event is recommended.				
Good Faith Efforts to Comply		25.0%	Reduction \$1,875	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary	x		
	N/A			
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.			
Violation Subtotal				\$5,625
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount		\$7,096	Violation Final Penalty Total \$7,125	
This violation Final Assessed Penalty (adjusted for limits)				\$7,125

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 5

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$50,000	20-Nov-2018	21-Sep-2021	2.84	\$7,096	n/a	\$7,096

Notes for DELAYED costs Estimated cost to connect the Benzene, Toluene, Ethylene, and Xylene Line to the Emergency Flare in order to prevent the recurrence of emissions events due to the same or similar causes as Incident Nos. 365698, 365699, 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485. The Date Required is the date the first emissions event occurred and the Final Date is the date of compliance.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance	\$50,000	TOTAL	\$7,096
-----------------------------------	----------	--------------	---------

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW															
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>																
Case ID No.	61726		<i>PCW Revision February 11, 2021</i>																
Reg. Ent. Reference No.	RN107716664																		
Media	Air																		
Enf. Coordinator	Yuliya Dunaway																		
Violation Number	6																		
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)																		
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 0.001 lb of H2S and 669.76 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 365699) that began on January 19, 2021 and lasted five hours and 52 minutes.																		
Base Penalty			\$25,000																
>> Environmental, Property and Human Health Matrix																			
OR	Release	<table border="1"> <tr> <td></td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>				Major	Moderate	Minor	Actual			x	Potential				Percent	30.0%	
		Major	Moderate	Minor															
	Actual			x															
Potential																			
>> Programmatic Matrix																			
Matrix Notes	Falsification	<table border="1"> <tr> <td></td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Major	Moderate	Minor					Percent	0.0%					
		Major	Moderate	Minor															
Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.																			
Adjustment			\$17,500																
			\$7,500																
Violation Events																			
Number of Violation Events		1	1 Number of violation days																
	<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td>x</td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>	daily		weekly		monthly	x	quarterly		semiannual		annual		single event		Violation Base Penalty			\$7,500
daily																			
weekly																			
monthly	x																		
quarterly																			
semiannual																			
annual																			
single event																			
One monthly event is recommended.																			
Good Faith Efforts to Comply		25.0%	Reduction	\$1,875															
	<table border="1"> <tr> <td></td> <td>Before NOE/NOV</td> <td>NOE/NOV to EDPRP/Settlement Offer</td> </tr> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td>x</td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </table>		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	Extraordinary			Ordinary	x		N/A			Notes		The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.			
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer																	
Extraordinary																			
Ordinary	x																		
N/A																			
Violation Subtotal			\$5,625																
Economic Benefit (EB) for this violation			Statutory Limit Test																
Estimated EB Amount		\$0	Violation Final Penalty Total	\$7,125															
This violation Final Assessed Penalty (adjusted for limits)			\$7,125																

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 6

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See the Economic Benefit in Violation No. 5.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$0

TOTAL \$0

Screening Date 17-Dec-2021 Respondent ETC Texas Pipeline, Ltd. Case ID No. 61726 Reg. Ent. Reference No. RN107716664 Media Air Enf. Coordinator Yuliya Dunaway		Docket No. 2021-1645-AIR-E PCW																		
		<i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>																		
Violation Number 7 Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)																				
Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 362.34 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 366450) that occurred on November 20, 2018 and lasted three hours and 12 minutes.																				
		Base Penalty \$25,000																		
>> Environmental, Property and Human Health Matrix																				
OR	<table border="1"> <tr> <td></td> <td colspan="3">Harm</td> </tr> <tr> <td>Release</td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>				Harm			Release	Major	Moderate	Minor	Actual			x	Potential				Percent 30.0%
		Harm																		
	Release	Major	Moderate	Minor																
Actual			x																	
Potential																				
>> Programmatic Matrix																				
Matrix Notes	<table border="1"> <tr> <td></td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td>Falsification</td> <td></td> <td></td> <td></td> </tr> </table>				Major	Moderate	Minor	Falsification				Percent 0.0%								
		Major	Moderate	Minor																
	Falsification																			
Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.																				
			Adjustment \$17,500																	
			\$7,500																	
Violation Events																				
Number of Violation Events 1		1 Number of violation days																		
<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td>x</td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>		daily		weekly		monthly	x	quarterly		semiannual		annual		single event		Violation Base Penalty \$7,500				
daily																				
weekly																				
monthly	x																			
quarterly																				
semiannual																				
annual																				
single event																				
One monthly event is recommended.																				
Good Faith Efforts to Comply 25.0%		Reduction \$1,875																		
<table border="1"> <tr> <td></td> <td>Before NOE/NOV</td> <td>NOE/NOV to EDPRP/Settlement Offer</td> </tr> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td>x</td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </table>			Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	Extraordinary			Ordinary	x		N/A									
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary																				
Ordinary	x																			
N/A																				
Notes The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.																				
		Violation Subtotal \$5,625																		
Economic Benefit (EB) for this violation		Statutory Limit Test																		
Estimated EB Amount \$0		Violation Final Penalty Total \$7,125																		
		This violation Final Assessed Penalty (adjusted for limits) \$7,125																		

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No.

ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 7

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date 17-Dec-2021		Docket No. 2021-1645-AIR-E		PCW	
Respondent ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No. 61726		<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No. RN107716664					
Media Air					
Enf. Coordinator Yuliya Dunaway					
Violation Number 8					
Rule Cite(s)		30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description		Failed to prevent unauthorized emissions. Specifically, the Respondent released 24,792.97 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366451) that began on April 17, 2019 and lasted 121 hours and three minutes.			
		Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix					
OR			Harm		
	Release	Major	Moderate	Minor	
	Actual		x		Percent 50.0%
	Potential				
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	Percent 0.0%
Matrix Notes	Human health or the environment has been exposed to significant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.				
Adjustment					\$12,500
					\$12,500
Violation Events					
Number of Violation Events		1	6		Number of violation days
	daily				
	weekly	x			
	monthly				
	quarterly				
	semiannual				
	annual				
	single event				
Violation Base Penalty					\$12,500
One weekly event is recommended.					
Good Faith Efforts to Comply		25.0%		Reduction \$3,125	
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary				
	Ordinary	x			
	N/A				
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.				
Violation Subtotal					\$9,375
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount \$0			Violation Final Penalty Total \$11,875		
This violation Final Assessed Penalty (adjusted for limits)					\$11,875

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 8

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>	
Case ID No.	61726		<i>PCW Revision February 11, 2021</i>	
Reg. Ent. Reference No.	RN107716664			
Media	Air			
Enf. Coordinator	Yuliya Dunaway			
Violation Number	9			
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 8,346.25 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366453) that began on June 3, 2019 and lasted 40 hours and 45 minutes.			
Base Penalty			\$25,000	
>> Environmental, Property and Human Health Matrix				
OR	Release	Harm		
		Major	Moderate	Minor
	Actual			x
Potential				
Percent			30.0%	
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
Percent			0.0%	
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
Adjustment			\$17,500	
			\$7,500	
Violation Events				
Number of Violation Events		1	2	Number of violation days
	daily			
	weekly			
	monthly	x		
	quarterly			
	semiannual			
	annual			
	single event			
Violation Base Penalty			\$7,500	
One monthly event is recommended.				
Good Faith Efforts to Comply		25.0%	Reduction \$1,875	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
Extraordinary				
Ordinary	x			
N/A				
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.			
Violation Subtotal			\$5,625	
Economic Benefit (EB) for this violation			Statutory Limit Test	
Estimated EB Amount		\$0	Violation Final Penalty Total	
			\$7,125	
This violation Final Assessed Penalty (adjusted for limits)			\$7,125	

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 9

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided CostsANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date 17-Dec-2021 Respondent ETC Texas Pipeline, Ltd. Case ID No. 61726 Reg. Ent. Reference No. RN107716664 Media Air Enf. Coordinator Yuliya Dunaway		Docket No. 2021-1645-AIR-E PCW																		
		<i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>																		
Violation Number 10 Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)																				
Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 7,827.38 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366454) that began on October 2, 2019 and lasted 38 hours and 13 minutes.																				
		Base Penalty \$25,000																		
>> Environmental, Property and Human Health Matrix																				
OR	<table border="1"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <th>Release</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>				Harm			Release	Major	Moderate	Minor	Actual			x	Potential				Percent 30.0%
		Harm																		
	Release	Major	Moderate	Minor																
Actual			x																	
Potential																				
>> Programmatic Matrix																				
Matrix Notes	<table border="1"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Falsification	Major	Moderate	Minor						Percent 0.0%						
		Falsification	Major	Moderate	Minor															
Human health or the environment has been exposed to insignificant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of the violation.																				
			Adjustment \$17,500																	
			\$7,500																	
Violation Events																				
Number of Violation Events 1		2 Number of violation days																		
<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td>x</td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>		daily		weekly		monthly	x	quarterly		semiannual		annual		single event		Violation Base Penalty \$7,500				
daily																				
weekly																				
monthly	x																			
quarterly																				
semiannual																				
annual																				
single event																				
One monthly event is recommended.																				
Good Faith Efforts to Comply 25.0%		Reduction \$1,875																		
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																				
Extraordinary																				
Ordinary	x																			
N/A																				
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.																			
		Violation Subtotal \$5,625																		
Economic Benefit (EB) for this violation		Statutory Limit Test																		
Estimated EB Amount \$0		Violation Final Penalty Total \$7,125																		
		This violation Final Assessed Penalty (adjusted for limits) \$7,125																		

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 10

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date 17-Dec-2021		Docket No. 2021-1645-AIR-E		PCW	
Respondent ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No. 61726		<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No. RN107716664					
Media Air					
Enf. Coordinator Yuliya Dunaway					
Violation Number 11					
Rule Cite(s)		30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description		Failed to prevent unauthorized emissions. Specifically, the Respondent released 1,436.94 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366464) that occurred on December 29, 2019 and lasted seven hours and one minute.			
		Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix					
OR	Release		Harm		
		Major	Moderate	Minor	
	Actual			x	
	Potential				
					Percent 30.0%
>>Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					Percent 0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.				
Adjustment					\$17,500
					\$7,500
Violation Events					
Number of Violation Events		1	1		Number of violation days
	daily				
	weekly				
	monthly	x			
	quarterly				
	semiannual				
	annual				
	single event				
Violation Base Penalty					\$7,500
One monthly event is recommended.					
Good Faith Efforts to Comply		25.0%		Reduction	
				\$1,875	
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer			
Extraordinary					
Ordinary		x			
N/A					
Notes		The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.			
Violation Subtotal					\$5,625
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$0		Violation Final Penalty Total	
				\$7,125	
This violation Final Assessed Penalty (adjusted for limits)					\$7,125

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 11

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided CostsANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date 17-Dec-2021 Respondent ETC Texas Pipeline, Ltd. Case ID No. 61726 Reg. Ent. Reference No. RN107716664 Media Air Enf. Coordinator Yuliya Dunaway		Docket No. 2021-1645-AIR-E PCW																		
		<i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>																		
Violation Number 12 Rule Cite(s)		30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)																		
Violation Description		Failed to prevent unauthorized emissions. Specifically, the Respondent released 333.64 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366467) that occurred on March 29, 2020 and lasted two hours and 25 minutes.																		
		Base Penalty \$25,000																		
>> Environmental, Property and Human Health Matrix																				
OR	<table border="1"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <th>Release</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>				Harm			Release	Major	Moderate	Minor	Actual			x	Potential				Percent 30.0%
		Harm																		
	Release	Major	Moderate	Minor																
Actual			x																	
Potential																				
>> Programmatic Matrix																				
Matrix Notes	<table border="1"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Falsification	Major	Moderate	Minor						Percent 0.0%						
		Falsification	Major	Moderate	Minor															
Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.																				
			Adjustment \$17,500																	
			\$7,500																	
Violation Events																				
Number of Violation Events 1		1 Number of violation days																		
<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td>x</td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>		daily		weekly		monthly	x	quarterly		semiannual		annual		single event		Violation Base Penalty \$7,500				
daily																				
weekly																				
monthly	x																			
quarterly																				
semiannual																				
annual																				
single event																				
One monthly event is recommended.																				
Good Faith Efforts to Comply		25.0%	Reduction \$1,875																	
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary																				
Ordinary		x																		
N/A																				
Notes		The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.																		
			Violation Subtotal \$5,625																	
Economic Benefit (EB) for this violation		Statutory Limit Test																		
Estimated EB Amount \$0		Violation Final Penalty Total \$7,125																		
This violation Final Assessed Penalty (adjusted for limits)			\$7,125																	

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No.

ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 12

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>	
Case ID No.	61726	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN107716664			
Media	Air			
Enf. Coordinator	Yuliya Dunaway			
Violation Number	13			
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 510.81 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366469) that occurred on March 31, 2020 and lasted three hours and 42 minutes.			
Base Penalty				\$25,000
>> Environmental, Property and Human Health Matrix				
OR	Release	Harm		
		Major	Moderate	Minor
	Actual			x
	Potential			
				Percent 30.0%
>>Programmatic Matrix				
	Falsification	Major	Moderate	Minor
				Percent 0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
Adjustment				\$17,500
				\$7,500
Violation Events				
Number of Violation Events		1	Number of violation days	
	daily			
	weekly			
	monthly	x		
	quarterly			
	semiannual			
	annual			
	single event			
Violation Base Penalty				\$7,500
One monthly event is recommended.				
Good Faith Efforts to Comply		25.0%	Reduction	
			\$1,875	
	Extraordinary			
	Ordinary	x		
	N/A			
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.			
Violation Subtotal				\$5,625
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount	\$0	Violation Final Penalty Total		\$7,125
This violation Final Assessed Penalty (adjusted for limits)				\$7,125

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 13

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See the Economic Benefit in Violation No. 5.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$0

TOTAL \$0

Screening Date 17-Dec-2021		Docket No. 2021-1645-AIR-E		PCW	
Respondent ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>			
Case ID No. 61726		<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No. RN107716664					
Media Air					
Enf. Coordinator Yuliya Dunaway					
Violation Number 14					
Rule Cite(s)		30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description		Failed to prevent unauthorized emissions. Specifically, the Respondent released 750.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366470) that occurred on May 20, 2020 and lasted five hours and 26 minutes.			
		Base Penalty		\$25,000	
>> Environmental, Property and Human Health Matrix					
OR	Release		Harm		
		Major	Moderate	Minor	
	Actual			x	
	Potential				Percent 30.0%
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					Percent 0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.				
Adjustment					\$17,500
					\$7,500
Violation Events					
Number of Violation Events		1	Number of violation days		1
	daily				
	weekly				
	monthly	x			
	quarterly				
	semiannual				
	annual				
	single event				
Violation Base Penalty					\$7,500
One monthly event is recommended.					
Good Faith Efforts to Comply		25.0%		Reduction	
				\$1,875	
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer			
Extraordinary					
Ordinary		x			
N/A					
Notes		The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.			
Violation Subtotal					\$5,625
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$0		Violation Final Penalty Total	
				\$7,125	
This violation Final Assessed Penalty (adjusted for limits)					\$7,125

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 14

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0

Notes for DELAYED costs

See the Economic Benefit in Violation No. 5.

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance \$0

TOTAL \$0

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW	
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>		
Case ID No.	61726		<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN107716664				
Media	Air				
Enf. Coordinator	Yuliya Dunaway				
Violation Number	15				
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)				
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 520.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366472) that occurred on June 7, 2020 and lasted three hours and 46 minutes.				
Base Penalty			\$25,000		
>> Environmental, Property and Human Health Matrix					
OR	Release	Harm		Percent	
		Major	Moderate		Minor
	Actual			X	30.0%
	Potential				
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	Percent
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.				
Adjustment			\$17,500		
			\$7,500		
Violation Events					
Number of Violation Events		1	1 Number of violation days		
	daily		Violation Base Penalty		
	weekly				
	monthly	X			
	quarterly				
	semiannual				
	annual				
	single event		\$7,500		
One monthly event is recommended.					
Good Faith Efforts to Comply		25.0%	Reduction		
			\$1,875		
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer			
	Extraordinary				
	Ordinary	X			
	N/A				
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.				
Violation Subtotal			\$5,625		
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$0	Violation Final Penalty Total		
			\$7,125		
This violation Final Assessed Penalty (adjusted for limits)			\$7,125		

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 15

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided CostsANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>	
Case ID No.	61726	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN107716664			
Media	Air			
Enf. Coordinator	Yuliya Dunaway			
Violation Number	16			
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 687.99 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366474) that occurred on June 9, 2020 and lasted four hours and 59 minutes.			
			Base Penalty	\$25,000
>> Environmental, Property and Human Health Matrix				
OR	Release	Harm		
		Major	Moderate	Minor
	Actual			x
	Potential			
			Percent	30.0%
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
			Percent	0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
			Adjustment	\$17,500
				\$7,500
Violation Events				
Number of Violation Events		1	1	Number of violation days
	daily			
	weekly			
	monthly	x		
	quarterly			
	semiannual			
	annual			
	single event			
			Violation Base Penalty	\$7,500
One monthly event is recommended.				
Good Faith Efforts to Comply		25.0%	Reduction	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer		
	Extraordinary			
	Ordinary	x		
	N/A			
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.			
			Violation Subtotal	\$5,625
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount		\$0	Violation Final Penalty Total	\$7,125
			This violation Final Assessed Penalty (adjusted for limits)	\$7,125

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 16

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided CostsANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW																
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>																	
Case ID No.	61726		<i>PCW Revision February 11, 2021</i>																	
Reg. Ent. Reference No.	RN107716664																			
Media	Air																			
Enf. Coordinator	Yuliya Dunaway																			
Violation Number	17																			
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)																			
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 476.30 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366475) that occurred on July 2, 2020 and lasted three hours and 27 minutes.																			
Base Penalty			\$25,000																	
>> Environmental, Property and Human Health Matrix																				
OR	Release	<table border="1"> <thead> <tr> <th></th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> </thead> <tbody> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>				Major	Moderate	Minor	Actual			x	Potential				Percent	30.0%		
		Major	Moderate	Minor																
	Actual			x																
Potential																				
>>Programmatic Matrix																				
	Falsification	Major	Moderate	Minor	Percent	0.0%														
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.																			
Adjustment			\$17,500																	
			\$7,500																	
Violation Events																				
Number of Violation Events		1	1	Number of violation days																
	<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td>x</td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>	daily		weekly		monthly	x	quarterly		semiannual		annual		single event					Violation Base Penalty	\$7,500
daily																				
weekly																				
monthly	x																			
quarterly																				
semiannual																				
annual																				
single event																				
One monthly event is recommended.																				
Good Faith Efforts to Comply		25.0%		Reduction	\$1,875															
	<table border="1"> <thead> <tr> <th></th> <th>Before NOE/NOV</th> <th>NOE/NOV to EDPRP/Settlement Offer</th> </tr> </thead> <tbody> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td>x</td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </tbody> </table>		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	Extraordinary			Ordinary	x		N/A									
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary																				
Ordinary	x																			
N/A																				
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.																			
Violation Subtotal			\$5,625																	
Economic Benefit (EB) for this violation			Statutory Limit Test																	
Estimated EB Amount		\$0		Violation Final Penalty Total	\$7,125															
This violation Final Assessed Penalty (adjusted for limits)			\$7,125																	

Economic Benefit Worksheet

Respondent ETC Texas Pipeline, Ltd.
Case ID No. 61726
Reg. Ent. Reference No. RN107716664
Media Air
Violation No. 17

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided CostsANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date 17-Dec-2021 Respondent ETC Texas Pipeline, Ltd. Case ID No. 61726 Reg. Ent. Reference No. RN107716664 Media Air Enf. Coordinator Yuliya Dunaway		Docket No. 2021-1645-AIR-E PCW																		
		<i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>																		
Violation Number 18 Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)																				
Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 694.89 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366476) that occurred on July 16, 2020 and lasted five hours and two minutes.																				
		Base Penalty \$25,000																		
>> Environmental, Property and Human Health Matrix																				
OR	<table border="1"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <td>Release</td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>				Harm			Release	Major	Moderate	Minor	Actual			x	Potential				Percent 30.0%
		Harm																		
	Release	Major	Moderate	Minor																
Actual			x																	
Potential																				
>> Programmatic Matrix																				
	<table border="1"> <tr> <td></td> <td>Falsification</td> <td>Major</td> <td>Moderate</td> <td>Minor</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Falsification	Major	Moderate	Minor						Percent 0.0%						
	Falsification	Major	Moderate	Minor																
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.																			
			Adjustment \$17,500																	
				\$7,500																
Violation Events																				
Number of Violation Events 1		1 Number of violation days																		
	<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td>x</td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>	daily		weekly		monthly	x	quarterly		semiannual		annual		single event		Violation Base Penalty \$7,500				
daily																				
weekly																				
monthly	x																			
quarterly																				
semiannual																				
annual																				
single event																				
One monthly event is recommended.																				
Good Faith Efforts to Comply 25.0%		Reduction \$1,875																		
	<table border="1"> <tr> <td></td> <td>Before NOE/NOV</td> <td>NOE/NOV to EDPRP/Settlement Offer</td> </tr> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td>x</td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </table>		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	Extraordinary			Ordinary	x		N/A									
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary																				
Ordinary	x																			
N/A																				
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.																			
			Violation Subtotal	\$5,625																
Economic Benefit (EB) for this violation		Statutory Limit Test																		
Estimated EB Amount \$0		Violation Final Penalty Total \$7,125																		
This violation Final Assessed Penalty (adjusted for limits)				\$7,125																

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 18

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date 17-Dec-2021 Respondent ETC Texas Pipeline, Ltd. Case ID No. 61726 Reg. Ent. Reference No. RN107716664 Media Air Enf. Coordinator Yuliya Dunaway		Docket No. 2021-1645-AIR-E PCW																		
		<i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>																		
Violation Number 19 Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)																				
Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 842.15 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366477) that occurred on September 4, 2020 and lasted six hours and six minutes.																				
		Base Penalty \$25,000																		
>> Environmental, Property and Human Health Matrix																				
OR	<table border="1"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <th>Release</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>				Harm			Release	Major	Moderate	Minor	Actual			x	Potential				Percent 30.0%
		Harm																		
	Release	Major	Moderate	Minor																
Actual			x																	
Potential																				
>> Programmatic Matrix																				
Matrix Notes	<table border="1"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Falsification	Major	Moderate	Minor						Percent 0.0%						
		Falsification	Major	Moderate	Minor															
Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.																				
			Adjustment \$17,500																	
			\$7,500																	
Violation Events																				
Number of Violation Events 1		1 Number of violation days																		
<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td>x</td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>		daily		weekly		monthly	x	quarterly		semiannual		annual		single event		Violation Base Penalty \$7,500				
daily																				
weekly																				
monthly	x																			
quarterly																				
semiannual																				
annual																				
single event																				
One monthly event is recommended.																				
Good Faith Efforts to Comply		25.0%	Reduction \$1,875																	
		Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary																				
Ordinary		x																		
N/A																				
Notes		The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.																		
			Violation Subtotal \$5,625																	
Economic Benefit (EB) for this violation		Statutory Limit Test																		
Estimated EB Amount \$0		Violation Final Penalty Total \$7,125																		
This violation Final Assessed Penalty (adjusted for limits)			\$7,125																	

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 19

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs

ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>	
Case ID No.	61726	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN107716664			
Media	Air			
Enf. Coordinator	Yuliya Dunaway			
Violation Number	20			
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 687.99 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366480) that occurred on September 22, 2020 and lasted four hours and 59 minutes.			
Base Penalty				\$25,000
>> Environmental, Property and Human Health Matrix				
OR	Release	Harm		
		Major	Moderate	Minor
	Actual			x
Potential				
Percent				30.0%
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
Percent				0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			
Adjustment				\$17,500
				\$7,500
Violation Events				
Number of Violation Events		1	Number of violation days	
	daily			
	weekly			
	monthly	x		
	quarterly			
	semiannual			
	annual			
	single event			
Violation Base Penalty				\$7,500
One monthly event is recommended.				
Good Faith Efforts to Comply		25.0%	Reduction	
			\$1,875	
	Extraordinary			
	Ordinary	x		
	N/A			
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.			
Violation Subtotal				\$5,625
Economic Benefit (EB) for this violation		Statutory Limit Test		
Estimated EB Amount		\$0	Violation Final Penalty Total	
			\$7,125	
This violation Final Assessed Penalty (adjusted for limits)				\$7,125

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 20

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date	17-Dec-2021	Docket No.	2021-1645-AIR-E	PCW	
Respondent	ETC Texas Pipeline, Ltd.		<i>Policy Revision 5 (January 28, 2021)</i>		
Case ID No.	61726	<i>PCW Revision February 11, 2021</i>			
Reg. Ent. Reference No.	RN107716664				
Media	Air				
Enf. Coordinator	Yuliya Dunaway				
Violation Number	21				
Rule Cite(s)	30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)				
Violation Description	Failed to prevent unauthorized emissions. Specifically, the Respondent released 303.74 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366482) that occurred on November 3, 2020 and lasted two hours and 12 minutes.				
Base Penalty			\$25,000		
>> Environmental, Property and Human Health Matrix					
OR	Release	Major	Moderate	Minor	
	Actual			x	Percent 30.0%
	Potential				
>> Programmatic Matrix					
	Falsification	Major	Moderate	Minor	
					Percent 0.0%
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.				
Adjustment			\$17,500		
			\$7,500		
Violation Events					
Number of Violation Events		1	1 Number of violation days		
	daily				
	weekly				
	monthly	x			
	quarterly				
	semiannual				
	annual				
	single event				
Violation Base Penalty			\$7,500		
One monthly event is recommended.					
Good Faith Efforts to Comply		25.0%	Reduction	\$1,875	
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer			
	Extraordinary				
	Ordinary	x			
	N/A				
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.				
Violation Subtotal			\$5,625		
Economic Benefit (EB) for this violation			Statutory Limit Test		
Estimated EB Amount		\$0	Violation Final Penalty Total	\$7,125	
This violation Final Assessed Penalty (adjusted for limits)			\$7,125		

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No.

ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 21

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----

Screening Date 17-Dec-2021 Respondent ETC Texas Pipeline, Ltd. Case ID No. 61726 Reg. Ent. Reference No. RN107716664 Media Air Enf. Coordinator Yuliya Dunaway		Docket No. 2021-1645-AIR-E PCW																		
		<i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>																		
Violation Number 22 Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)																				
Violation Description Failed to prevent unauthorized emissions. Specifically, the Respondent released 276.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366485) that occurred on December 16, 2020 and lasted two hours.																				
		Base Penalty \$25,000																		
>> Environmental, Property and Human Health Matrix																				
OR	<table border="1"> <tr> <td></td> <th colspan="3">Harm</th> </tr> <tr> <th>Release</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td>Actual</td> <td></td> <td></td> <td>x</td> </tr> <tr> <td>Potential</td> <td></td> <td></td> <td></td> </tr> </table>				Harm			Release	Major	Moderate	Minor	Actual			x	Potential				Percent 30.0%
		Harm																		
	Release	Major	Moderate	Minor																
Actual			x																	
Potential																				
>> Programmatic Matrix																				
	<table border="1"> <tr> <td></td> <th>Falsification</th> <th>Major</th> <th>Moderate</th> <th>Minor</th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>				Falsification	Major	Moderate	Minor						Percent 0.0%						
	Falsification	Major	Moderate	Minor																
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.																			
			Adjustment \$17,500																	
				\$7,500																
Violation Events																				
Number of Violation Events 1		1 Number of violation days																		
	<table border="1"> <tr><td>daily</td><td></td></tr> <tr><td>weekly</td><td></td></tr> <tr><td>monthly</td><td>x</td></tr> <tr><td>quarterly</td><td></td></tr> <tr><td>semiannual</td><td></td></tr> <tr><td>annual</td><td></td></tr> <tr><td>single event</td><td></td></tr> </table>	daily		weekly		monthly	x	quarterly		semiannual		annual		single event		Violation Base Penalty \$7,500				
daily																				
weekly																				
monthly	x																			
quarterly																				
semiannual																				
annual																				
single event																				
One monthly event is recommended.																				
Good Faith Efforts to Comply 25.0%		Reduction \$1,875																		
	<table border="1"> <tr> <td></td> <td>Before NOE/NOV</td> <td>NOE/NOV to EDPRP/Settlement Offer</td> </tr> <tr> <td>Extraordinary</td> <td></td> <td></td> </tr> <tr> <td>Ordinary</td> <td>x</td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> </tr> </table>		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	Extraordinary			Ordinary	x		N/A									
	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer																		
Extraordinary																				
Ordinary	x																			
N/A																				
Notes	The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.																			
			Violation Subtotal	\$5,625																
Economic Benefit (EB) for this violation		Statutory Limit Test																		
Estimated EB Amount \$0		Violation Final Penalty Total \$7,125																		
This violation Final Assessed Penalty (adjusted for limits)				\$7,125																

Economic Benefit Worksheet

Respondent Case ID No. Reg. Ent. Reference No. Media Violation No. ETC Texas Pipeline, Ltd. 61726 RN107716664 Air 22

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
------------------	-----------	---------------	------------	-----	----------------	-------------	-----------

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs	See the Economic Benefit in Violation No. 5.						

Avoided Costs ANNUALIZE avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							

Approx. Cost of Compliance	\$0	TOTAL	\$0
----------------------------	-----	-------	-----



Compliance History Report

Compliance History Report for CN601587652, RN107716664, Rating Year 2023 which includes Compliance History (CH) components from September 1, 2018, through August 31, 2023.

Customer, Respondent, or Owner/Operator: CN601587652, ETC Texas Pipeline, Ltd. **Classification:** SATISFACTORY **Rating:** 1.01

Regulated Entity: RN107716664, ALAMO GAS PLANT **Classification:** SATISFACTORY **Rating:** 3.75

Complexity Points: 4 **Repeat Violator:** NO

CH Group: 03 - Oil and Gas Extraction

Location: Approximately 0.4 mile southeast of the westernmost intersection of Texas Highway 7 and County Road 3020 near Crockett, Houston County, Texas

TCEQ Region: REGION 10 - BEAUMONT

ID Number(s):

AIR OPERATING PERMITS PERMIT 3840 **AIR NEW SOURCE PERMITS** REGISTRATION 123434

AIR NEW SOURCE PERMITS AFS NUM 4822500381 **AIR EMISSIONS INVENTORY** ACCOUNT NUMBER HSA001A

TAX RELIEF ID NUMBER 20283

Compliance History Period: September 01, 2018 to August 31, 2023 **Rating Year:** 2023 **Rating Date:** 09/01/2023

Date Compliance History Report Prepared: April 01, 2024

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: April 01, 2019 to April 01, 2024

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Yuliya Dunaway **Phone:** (210) 403-4077

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

- 1 Effective Date: 08/04/2020 ADMINORDER 2020-0270-AIR-E (1660 Order-Agreed Order With Denial)
- Classification: Moderate
- Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 116, SubChapter F 116.615(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
- Rqmt Prov: GOP 514 (b)(2) OP
GOP 514 (b)(9)(E)(ii) OP
- Description: Failed to prevent unauthorized emissions. The Respondent released 16,336.91 pounds ("lbs") of volatile organic compounds ("VOC") from the Cryo-Reboiler Exchanger and 0.17 lb of VOC, 8.7 lbs of nitrogen monoxide, and 18.28 lbs of carbon monoxide from the Emergency Flare, during an emissions event (Incident No. 317752) that occurred on July 30, 2019 and lasted four hours. The emissions event occurred when the Cryo-Reboiler Exchanger ruptured due to an unknown cause after completing a 24-hour "dry

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	November 13, 2019	(1604619)
Item 2	July 15, 2020	(1658823)
Item 3	August 20, 2020	(1665874)
Item 4	October 27, 2020	(1679675)
Item 5	December 16, 2020	(1692334)
Item 6	October 20, 2022	(1852170)
Item 7	October 26, 2022	(1853209)
Item 8	November 02, 2022	(1852979)
Item 9	March 23, 2023	(1854167)
Item 10	April 26, 2023	(1888163)
Item 11	December 22, 2023	(1937467)

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
ETC TEXAS PIPELINE, LTD.
RN107716664

§ BEFORE THE
§ TEXAS COMMISSION ON
§ ENVIRONMENTAL QUALITY
§

AGREED ORDER DOCKET NO. 2021-1645-AIR-E

I. JURISDICTION AND STIPULATIONS

On _____, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding ETC Texas Pipeline, Ltd. (the "Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent together stipulate that:

1. The Respondent owns and operates a natural gas processing plant located approximately 0.4 mile southeast of the westernmost intersection of Texas Highway 7 and County Road 3020 near Crockett, Houston County, Texas (the "Plant"). The Plant consists or consisted of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
2. The Executive Director and the Respondent agree that the TCEQ has jurisdiction to enter this Order pursuant to TEX. WATER CODE §§ 7.002, 7.051, and 7.073, and that the Respondent is subject to TCEQ's jurisdiction. The TCEQ has jurisdiction in this matter pursuant to TEX. WATER CODE § 5.013 because it alleges violations of TEX. HEALTH & SAFETY CODE ch. 382 and the rules of the TCEQ.
3. The occurrence of any violation is in dispute and the entry of this Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
4. An administrative penalty in the amount of \$141,550 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$56,620 of the penalty and \$28,310 of the penalty is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order and shall be waived only upon full compliance with all the terms and conditions of this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms and conditions contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.

Pursuant to TEX. WATER CODE § 7.067, \$56,620 of the penalty shall be conditionally offset by the Respondent's timely and satisfactory completion of the Supplemental Environmental Project ("SEP") as defined in the attached SEP Agreement ("Attachment A", incorporated herein by reference). The Respondent's obligation to pay the conditionally offset portion of the penalty shall be discharged upon full compliance with all the terms

and conditions of this Order, which includes the timely and satisfactory completion of all provisions of the SEP Agreement, as determined by the Executive Director.

5. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a). Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
6. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Order.
7. This Order represents the complete and fully-integrated agreement of the parties. The provisions of this Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Order unenforceable, the remaining provisions shall be valid and enforceable.
8. This Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Order, whichever is later.
9. The Executive Director recognizes that the Respondent implemented the following corrective measures at the Plant:
 - a. On August 27, 2021, submitted the initial notifications for Incident Nos. 365698 and 365699;
 - b. On September 10, 2021, submitted the final records for Incident Nos. 365698 and 365699;
 - c. On September 14, 2021, submitted the initial notifications for Incident Nos. 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485;
 - d. By September 21, 2021, connected the Benzene, Toluene, Ethylene, and Xylene Line to the Emergency Flare in order to prevent the recurrence of emissions events due to the same or similar causes as Incident Nos. 365698, 365699, 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485; and
 - e. On September 22, 2021, submitted the final records for Incident Nos. 366450, 366451, 366453, 366454, 366464, 366467, 366469, 366470, 366472, 366474, 366475, 366476, 366477, 366480, 366482, and 366485.

II. ALLEGATIONS

During a record review for the Plant conducted on November 12, 2021, an investigator documented that the Respondent:

1. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event, in violation of 30 TEX. ADMIN. CODE

§§ 101.201(a)(1)(B) and 122.143(4), Federal Operating Permit ("FOP") No. 03840/General Operating Permit ("GOP") No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the initial notifications for Incident Nos. 365698 and 365699 were due by January 17, 2021 at 12:45 p.m. and January 20, 2021 at 8:50 a.m., respectively, but were not submitted until August 27, 2021 at 2:46 p.m. and 2:48 p.m., respectively.

2. Failed to submit an initial notification for a reportable emissions event no later than 24 hours after the discovery of an emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the initial notifications for 16 emissions events were not submitted within 24 hours after discovery as listed in Attachment B - Initial Notification Table.
3. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(c) and 122.143(4), FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the final records for Incident Nos. 365698 and 365699 were due by January 30, 2021 and February 3, 2021, respectively, but were not submitted until September 10, 2021.
4. Failed to submit a final record for a reportable emissions event no later than two weeks after the end of the emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(c) and 122.143(4), FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(40)(F), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the final records for 16 reportable emission events were not submitted within two weeks after the end of the emissions events as listed in Attachment C - Final Record Table.
5. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 791.53 pounds ("lbs") of volatile organic compounds ("VOC") and 0.001 lb of hydrogen sulfide ("H₂S") from the TEG Still Vent, Emissions Point Number ("EPN") TO, during an emissions event (Incident No. 365698) that occurred on January 16, 2021 and lasted six hours and 56 minutes.
6. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 0.001 lb of H₂S and 669.76 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 365699) that began on January 19, 2021 and lasted five hours and 52 minutes.
7. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 362.34 lbs of VOC as fugitive emissions, during an emissions event (Incident No. 366450) that occurred on November 20, 2018 and lasted three hours and 12 minutes.

8. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 24,792.97 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366451) that began on April 17, 2019 and lasted 121 hours and three minutes.
9. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 8,346.25 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366453) that began on June 3, 2019 and lasted 40 hours and 45 minutes.
10. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 7,827.38 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366454) that began on October 2, 2019 and lasted 38 hours and 13 minutes.
11. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 1,436.94 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366464) that occurred on December 29, 2019 and lasted seven hours and one minute.
12. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 333.64 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366467) that occurred on March 29, 2020 and lasted two hours and 25 minutes.
13. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 510.81 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366469) that occurred on March 31, 2020 and lasted three hours and 42 minutes.
14. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 750.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366470) that occurred on May 20, 2020 and lasted five hours and 26 minutes.
15. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX.

- HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 520.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366472) that occurred on June 7, 2020 and lasted three hours and 46 minutes.
16. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 687.99 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366474) that occurred on June 9, 2020 and lasted four hours and 59 minutes.
 17. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 476.30 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366475) that occurred on July 2, 2020 and lasted three hours and 27 minutes.
 18. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 694.89 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366476) that occurred on July 16, 2020 and lasted five hours and two minutes.
 19. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 842.15 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366477) that occurred on September 4, 2020 and lasted six hours and six minutes.
 20. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 687.99 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366480) that occurred on September 22, 2020 and lasted four hours and 59 minutes.
 21. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 303.74 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366482) that occurred on November 3, 2020 and lasted two hours and 12 minutes.
 22. Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit Registration No. 123434, FOP No. 03840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent released 276.11 lbs of VOC from the TEG Still Vent, EPN TO, during an emissions event (Incident No. 366485) that occurred on December 16, 2020 and lasted two hours.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed a penalty as set forth in Section I, Paragraph No. 4. The payment of this penalty and the Respondent's compliance with all of the requirements set forth in this Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: ETC Texas Pipeline, Ltd., Docket No. 2021-1645-AIR-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088
2. The Respondent shall implement and complete the SEP as set forth in Section I, Paragraph No. 4. The amount of \$56,620 of the assessed penalty is conditionally offset based on the Respondent's implementation and completion of the SEP pursuant to the terms of the SEP Agreement, as defined in Attachment A. Penalty payments for any portion of the SEP deemed by the Executive Director as not complete shall be paid within 30 days after the date the Executive Director demands payment.
3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
6. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise

reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

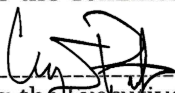
8. The effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date



7/22/2024

For the Executive Director

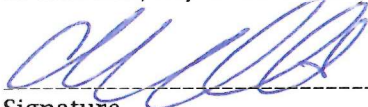
Date

I, the undersigned, have read and understand the attached Order. I am authorized to agree to the attached Order, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this Order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the OAG for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the OAG of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.



Signature



Name (Printed or typed)

Authorized Representative of
ETC Texas Pipeline, Ltd.

07/01/2024

Date



Title

☐ If mailing address has changed, please check this box and provide the new address below:

Instructions: Send the original, signed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Ordering Provision 1 of this Order.

Attachment A
Docket Number: 2021-1645-AIR-E
SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	ETC Texas Pipeline, Ltd.
Payable Penalty Amount:	\$113,240
SEP Offset Amount:	\$56,620
Type of SEP:	Contribution to a Third-Party Pre-Approved SEP
Third-Party Administrator:	Texas Congress of Parents and Teachers dba Texas PTA
Project Name:	<i>Texas PTA Clean School Bus Replacement Program</i>
Location of SEP:	Texas Air Quality Control Region 106: Southern Louisiana-Southeast Texas - Preference for Houston County

The Texas Commission on Environmental Quality (“TCEQ”) agrees to offset a portion of the administrative penalty amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project (“SEP”). The SEP Offset Amount is set forth above and such offset is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

a. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Administrator named above. The contribution will be to the **Texas Congress of Parents and Teachers dba Texas PTA** for the *Texas PTA Clean School Bus Replacement Program*. The contribution will be used in accordance with the SEP between the Third-Party Administrator and the TCEQ (the “Project”). Specifically, the contribution will be used to reduce nitrogen oxides, volatile organic compounds, carbon monoxide, and particulate matter emissions by replacing older diesel buses with newer buses that meet more stringent emission standards. The Third-Party Administrator shall use the SEP Offset Amount for up to 100% of the purchase price of a model year 2010 or newer bus to replace a diesel school bus that is model year 2002 or older. The SEP will be done in accordance with all federal, state, and local environmental laws and regulations.

All dollars contributed will be used solely for the direct cost of the Project, including but not limited to supplies, materials, and equipment. Any portion of this contribution that is not spent on the specifically identified SEP may, at the discretion of the Executive Director (“ED”), be applied to another pre-approved SEP.

The Respondent’s signature affixed to this Agreed Order certifies that it has no prior commitment to make this contribution and that it is being contributed solely to settle this enforcement action. The Respondent shall not profit in any manner from this SEP.

b. Environmental Benefit

This SEP will directly benefit air quality by reducing harmful exhaust emissions which contribute to the formation of ozone and may cause or exacerbate many respiratory diseases, including asthma. In addition, by encouraging less school bus idling, this SEP contributes to public awareness of environmental matters.

c. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Administrator and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Administrator. The Respondent shall make the check payable to **Texas Congress of Parents and Teachers SEP** and shall mail the contribution with a copy of the Agreed Order to:

Texas PTA
408 West 11th Street
Austin, Texas 78701

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the Enforcement Division SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount due to the Third-Party Administrator. The Respondent shall mail a copy of the check and transmittal letter to:

Texas Commission on Environmental Quality
Enforcement Division
Attention: SEP Coordinator, MC 219
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this Attachment A, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Sections 2 and 3 above, the ED may require immediate payment of all or part of the SEP Offset Amount.

In the event the ED determines that the Respondent failed to fully implement and complete the Project, the Respondent shall remit payment for all or a portion of the SEP Offset Amount, as determined by the ED, and as set forth in the attached Agreed Order. After receiving notice of failure to complete the SEP, the Respondent shall include the docket number of the attached Agreed Order and a note that the enclosed payment is for the reimbursement of a SEP; shall make the check payable to "Texas Commission on Environmental Quality"; and shall mail it to:

Texas Commission on Environmental Quality
Litigation Division
Attention: SEP Coordinator, MC 175
P.O. Box 13087
Austin, Texas 78711-3087

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent, must include a clear statement that **the Project was performed as part of the settlement of an enforcement action brought by the TCEQ**. Such statements include advertising, public relations, and press releases.

6. Recognition

The Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP Offset Amount identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

Attachment B

ETC Texas Pipeline, Ltd.
Docket No. 2021-1645-AIR-E

Initial Notification Table							
Investigation No.	Incident No.	Emissions Event Discovery		Initial Notification Due		Initial Notification Submitted	
		Date	Time	Date	Time	Date	Time
1764271	366450	November 20, 2018	11:03 a.m.	November 21, 2018	11:03 a.m.	September 14, 2021	2:38 p.m.
1764271	366451	April 17, 2019	5:52 p.m.	April 18, 2019	5:52 p.m.	September 14, 2021	2:42 p.m.
1764271	366453	June 3, 2019	8:17 p.m.	June 4, 2019	8:17 p.m.	September 14, 2021	2:45 p.m.
1764271	366454	October 2, 2019	3:50 p.m.	October 3, 2019	3:50 p.m.	September 14, 2021	2:50 p.m.
1764271	366464	December 29, 2019	6:17 a.m.	December 30, 2019	6:17 a.m.	September 14, 2021	3:12 p.m.
1764271	366467	March 29, 2020	12:48 p.m.	March 30, 2020	12:48 p.m.	September 14, 2021	3:17 p.m.
1764271	366469	March 31, 2020	11:20 a.m.	April 1, 2020	11:20 a.m.	September 14, 2021	3:23 p.m.
1764271	366470	May 20, 2020	6:56 a.m.	May 21, 2020	6:56 a.m.	September 14, 2021	3:28 p.m.
1764271	366472	June 7, 2020	1:05 a.m.	June 8, 2020	1:05 a.m.	September 14, 2021	3:33 p.m.
1764271	366474	June 9, 2020	2:53 a.m.	June 10, 2020	2:53 a.m.	September 14, 2021	3:37 p.m.
1764271	366475	July 2, 2020	12:03 a.m.	July 3, 2020	12:03 a.m.	September 14, 2021	3:41 p.m.
1764271	366476	July 16, 2020	1:49 a.m.	July 17, 2020	1:49 a.m.	September 14, 2021	3:45 p.m.
1764271	366477	September 4, 2020	3:02 a.m.	September 5, 2020	3:02 a.m.	September 14, 2021	3:48 p.m.
1764271	366480	September 22, 2020	8:54 a.m.	September 23, 2020	8:54 a.m.	September 14, 2021	3:52 p.m.
1764271	366482	November 3, 2020	6:09 a.m.	November 4, 2020	6:09 a.m.	September 14, 2021	3:55 p.m.
1764271	366485	December 16, 2020	7:19 p.m.	December 17, 2020	7:19 p.m.	September 14, 2021	11:05 p.m.

Attachment C

ETC Texas Pipeline, Ltd.
Docket No. 2021-1645-AIR-E

Final Record Table				
Investigation No.	Incident No.	Emissions Event End Date	Final Record Due Date	Final Record Submitted Date
		Date	Date	Date
1764271	366450	November 20, 2018	December 4, 2018	September 22, 2021
1764271	366451	April 22, 2019	May 6, 2019	September 22, 2021
1764271	366453	June 5, 2019	June 19, 2019	September 22, 2021
1764271	366454	October 4, 2019	October 18, 2019	September 22, 2021
1764271	366464	December 29, 2019	January 12, 2020	September 22, 2021
1764271	366467	March 29, 2020	April 12, 2020	September 22, 2021
1764271	366469	March 31, 2020	April 14, 2020	September 22, 2021
1764271	366470	May 20, 2020	June 3, 2020	September 22, 2021
1764271	366472	June 7, 2020	June 21, 2020	September 22, 2021
1764271	366474	June 9, 2020	June 23, 2020	September 22, 2021
1764271	366475	July 2, 2020	July 16, 2020	September 22, 2021
1764271	366476	July 16, 2020	July 30, 2020	September 22, 2021
1764271	366477	September 4, 2020	September 18, 2020	September 22, 2021
1764271	366480	September 22, 2020	October 6, 2020	September 22, 2021
1764271	366482	November 3, 2020	November 17, 2020	September 22, 2021
1764271	366485	December 16, 2020	December 30, 2020	September 22, 2021