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

### 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),

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)].

- 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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/GOP No. 514, Terms and Conditions Nos. (b)(2) and (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)].

- 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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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

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)].

- 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. O3840/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. O3840/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. O3840/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

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 Assigned 13-Dec-2021 **DATES** Screening 17-Dec-2021 **EPA Due** PCW 16-Jun-2024 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 Government/Non-Profit No Enf. Coordinator Yuliya Dunaway EC's Team Enforcement Team 2 Media Program(s) Air

Multi-Media

Ad	min. Penalty \$	Limit Minimum	\$0	Maximum	\$25,000			
			Pena	lty Calcula	ation Section			
TOTA	I DACE DENA	ALTY (Sum of		•		J11	Cubtotal 1	¢140.000
IUIA	L DASE PENA	ILIY (Sulli OI	violatioi	i base pena	ties)		Subtotal 1	\$149,000
<b>ADJU</b>	STMENTS (+	/-) TO SUBTO	TAL 1					
	Subtotals 2-7 are of <b>Compliance Hi</b>	btained by multiplying	the Total Base	e Penalty (Subtotal <b>20.0%</b>		ercentage.	otals 2, 3, & 7	\$29,800
	Compliance in	Story		20.0%	Aujustinent	Subt		\$29,800
	Notes	Enhancer	ment for on	e order containi	ng a denial of lia	bility.		
	Culpability	No		0.0%	Enhancement		Subtotal 4	\$0
	Notes	The Res	spondent do	pes not meet th	e culpability crite	eria.		
	<b>Good Faith Eff</b>	ort to Comply To	otal Adjust	ments			Subtotal 5	-\$37,250
							_	-
	<b>Economic Ben</b>	efit		0.0%	Enhancement*		Subtotal 6	\$0
	Estimated	Total EB Amounts d Cost of Compliance	\$8,250 \$59,000	*Capp	ed at the Total EB \$ A	Amount	_	
SUM (	OF SUBTOTA	LS 1-7				1	Final Subtotal	\$141,550
							-	
		AS JUSTICE M I Subtotal by the indica			0.0%		Adjustment	\$0
Reduces	or enfiances the rina	Subtotal by the maid	ateu percentag	je.				
	Notes							
						Final Pe	_ nalty Amount [	\$141,550
6= A =			_					
SIAI	OTORY LIMI	T ADJUSTMEN				Final Asse	essed Penalty	\$141,550
<b>DEFE</b>		enalty by the indicated	norcontago		20.0%	Reduction	Adjustment	-\$28,310
Reduces	tile i illai Assesseu Fe	marcy by the marcated	percentage.				1	
	Notes	С	eferral offe	ered for expedite	ed settlement.			
<b>D</b> 4 3 7 7							<b>-</b>	
PAYA	BLE PENALT	Y						\$113,240

**PCW** 

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

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

	Component	ory <i>Site</i> Enhancement (Subtotal 2)  Number of	Number	Adjust.		
	NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%		
		Other written NOVs	0	0%		
		Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%		
	Orders	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	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%		
	and Consent Decrees	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 (number of events)	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 (number of audits for which notices were submitted)	0	0%		
	Addits	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%		
		Environmental management systems in place for one year or more	No	0%		
	Other	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%		
D.		Adjustment Percen	tage (Subt	total 2)		
KE	epeat Violator (					
	No	Adjustment Percen	tage (Subt	total 3)		
Co	ompliance Histo	ory Person Classification (Subtotal 7)				
	Satisfactory	Performer Adjustment Percen	tage (Subt	total 7)		
Co	ompliance Histo	ory Summary				
	Compliance History Notes	Enhancement for one order containing a denial of liability.				
Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 20						

Screening Date	17-Dec-2021	<b>Docket No.</b> 2021-1645-AIR-E	PCW
	ETC Texas Pipeline, Ltd.	Pol	icy Revision 5 (January 28, 2021)
Case ID No.			PCW Revision February 11, 2021
Reg. Ent. Reference No.			
Media			
Enf. Coordinator	· · · · · · · · · · · · · · · · · · ·		
Violation Number	1		_
Rule Cite(s)	Permit ("FOP") No. O3840/Gener	01(a)(1)(B) and 122.143(4), Federal Operating all Operating Permit ("GOP") No. 514, Terms and (b)(40)(F), and Tex. Health & Safety Code § 382.085(b)	
Violation Description	than 24 hours after the discover notifications for Incident Nos. 36 at 12:45 p.m. and January 20,	cation for a reportable emissions event no latery of an emissions event. Specifically, the initial 5698 and 365699 were due by January 17, 2022 2021 at 8:50 a.m., respectively, but were not 221 at 2:46 p.m. and 2:48 p.m., respectively.	al 21
		Base Pena	<b>ty</b> \$25,000
>> Environmental, Proper	-	trix	
Release	Harm Major Moderate M	linor	
OR Release	Major Moderate M	linor	
Potential		Percent 0.0%	
The state of the s			
>>Programmatic Matrix			
Falsification	Major Moderate M	linor  Percent 1.0%	
		x Percent 1.0%	
Matrix Notes	Less than 30% of the rule	requirements were not met.	
		Adjustment \$24,7	50
			\$250
<b>Violation Events</b>			
Number of V	iolation Events 2	222 Number of violation days	
	daily weekly monthly	Violetian Base Bene	l <b>ty</b> \$500
	quarterly semiannual annual single event  x	Violation Base Pena	\$300
Two	single events are recommended	(one event for each initial notification).	
<b>Good Faith Efforts to Com</b>	ply 25.0%	Reducti	on \$125
	Before NOE/NOV NOE/	NOV to EDPRP/Settlement Offer	
	Extraordinary		
	Ordinary x		
	N/A The Respondent of	completed the corrective measures on	
	Notes August 27, 2021	1, prior to the Notice of Enforcement 1) dated December 9, 2021.	
	<del></del>	Violation Subto	tal \$375
<b>Economic Benefit (EB) for</b>	this violation	Statutory Limit Test	
Fatimet	od ER Amount	¢15 Violation Final Banatha Tai	+ 47F
Estimate	ed EB Amount	\$15 Violation Final Penalty To	<b>tal</b> \$475

	E	conomic	Benefit	Woi	rksheet		
Respondent	ETC Texas Pip	eline, Ltd.					
Case ID No.		•					
Reg. Ent. Reference No.							
Media							Years of
Violation No.						<b>Percent Interest</b>	Depreciation
Violation No.	1					<b>5</b> 0	-
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description							
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
	Estimated	l cost to submit th	ne initial notifica	tions fo	r Incident Nos. 365	5698 and 365699 (	\$250/initial
Notes for DELAYED costs	notification x	2 initial notification	ons). The Date	Require	d is the date the fi	rst initial notificatio	n was due and
			the Final Date	is the	date of compliance		
Avoided Costs	ANNUA	ALIZE avoided c	osts before en			one-time avoide	-
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	<u>\$0</u> \$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
•							
Approx. Cost of Compliance		\$500			TOTAL		\$15
• • • •		7-00					т

	E	conomic	Benefit	Woi	rksheet			
Respondent	ETC Texas Pip	eline, Ltd.						
Case ID No.								
Reg. Ent. Reference No.	RN107716664							
Media Violation No.	Air					Percent Interest	Years of Depreciation	
						5.0	15	
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount	
Item Description								
•								
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	366464, 36	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	ANNU/	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l 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	<u>\$0</u>	
Notes for AVOIDED costs								
Approx. Cost of Compliance	l .	\$4,000			TOTAL		\$563	

	E	conomic	Benefit	Woi	rksheet		
Respondent	ETC Texas Pip	eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.	RN107716664						
Media							Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
<u> </u>							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
<b>Engineering/Construction</b>				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	±500	20.1 2021	10.0 2021	0.00	\$0	n/a	\$0
Other (as needed)	\$500	30-Jan-2021	10-Sep-2021	0.61	\$15	n/a	\$15
	Estimated cos	t to submit the fin	al records for I	ncident	Nos. 365698 and 3	365699 (\$250/final	record x 2 final
Notes for DELAYED costs						and the Final Date i	
				complia			
Avoided Costs	ANNU	ALIZE avoided co	osts before er	tering		one-time avoide	l 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							
110100 101 711 012 12 00013							
Approx. Cost of Compliance		\$500			TOTAL		\$15
		· · · · · ·					

	Screening Date	17-Dec-2021	<b>Docket No.</b> 2021-1645-AIR-E	PCW
	Respondent	ETC Texas Pipeline, Ltd.	Po	licy Revision 5 (January 28, 2021)
	Case ID No.	61726		PCW Revision February 11, 2021
Rea.	Ent. Reference No.	RN107716664		, ,
	Media			
	Enf. Coordinator			
	Violation Number	·		
			1.201(c) and 122.143(4), FOP No. O3840/GOP No. 5	14
		Terms and Conditions Nos.	(b)(2) and (b)(40)(F), and Tex. Health & Safety Cod 382.085(b)	e §
	Violation Description	weeks after the end of the reportable emission events	cord for a reportable emissions event no later than two emissions event. Specifically, the final records for the were not submitted within two weeks after the end sions events (see Final Record Table).	of
			Base Pena	\$25,000
>> En <sup>1</sup>	vironmental, Prope	rty and Human Health	n Matrix	
	, , , , , , , , , , , , , , , , , , ,	Harm		
00	Release		Minor	
OR	Actual		Payant 0.00/	
	Potential		Percent 0.0%	
>>Pro	grammatic Matrix			
	Falsification	Major Moderate	Minor	
			X Percent 1.0%	
	Matrix Notes	Less than 30% of the	e rule requirements were not met.	
			Adjustment \$24,	750
				\$250
Violati	on Events			
	Number of \	/iolation Events 16	1023 Number of violation days	
			3	
		daily		
		weekly monthly		
		quarterly	Violation Base Pen	\$4,000
		semiannual		ψ 1/000
		annual		
		single event x		
	C	ivtoon single syents are reser	mmanded (and example for each final record)	
	3	ixteen single events are reco	mmended (one event for each final record).	
<b>Good F</b>	aith Efforts to Com	ply 25.0%	Reduct	tion \$1,000
		Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
		Extraordinary		
		Ordinary x		
		N/A	<u> </u>	
		•	dent completed the corrective measures on	
		Notes September	22, 2021, prior to the NOE dated December	
			9, 2021.	
			Violation Subto	<b>s</b> \$3,000
_	1 m di /			
Econoi	mic Benefit (EB) for	this violation	Statutory Limit Test	
	Estimate	ed EB Amount	\$561 Violation Final Penalty To	<b>s</b> \$3,800
		This vio	lation Final Assessed Penalty (adjusted for lim	<b>its)</b> \$3,800

	E	conomic	Benefit	Woi	ksheet			
Respondent		eline, Ltd.						
Case ID No.								
Reg. Ent. Reference No.  Media  Violation No.	Air	•				Percent Interest	Years of Depreciation	
3.3.2.3.						5.0	15	
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount	
Item Description								
Delayed Costs				=				
Equipment				0.00	\$0	\$0	\$0	
Buildings				0.00	\$0	\$0	\$0	
Other (as needed) Engineering/Construction				0.00	\$0 \$0	<u>\$0</u> \$0	<u>\$0</u> \$0	
Land				0.00	\$0	n/a	\$0 \$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	+4.000	4.5. 2010	22.0	0.00	\$0	n/a	\$0	
Other (as needed)	\$4,000	4-Dec-2018		2.80	\$561	n/a	\$561	
Notes for DELAYED costs	366467, 36	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	ANNU	ALIZE avoided co	osts before er	tering	item (except for	one-time avoided	d costs)	
Disposal				0.00	\$0	\$0	\$0	
Personnel				0.00	\$0	\$0	\$0	
Inspection/Reporting/Sampling				0.00	\$0 #0	\$0 #0	\$0 \$0	
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0	
ONE-TIME avoided costs				0.00	\$0	\$0 \$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			Dock	et No. 2021-1645-AIR-I	E	PCW
	<del>-</del>	ETC Texas Pipeli	ine, Ltd.			Policy Re	evision 5 (January 28, 2021)
	Case ID No.					PCW	Revision February 11, 2021
Reg.	Ent. Reference No.						
	Media						
	Enf. Coordinator						
	Violation Number Rule Cite(s)						
	Kule Cite(s)	30 Tex. Admin. Registration No	. 123434, FO	P No. 03840/G	5(2), and 122.143(4), Sta OP No. 514, Terms and Co alth & Safety Code § 382.0	nditions Nos.	
	Violation Description	791.53 poun hydrogen sulfid	ids ("lbs") of le ("H2S") fro missions eve	volatile organic om the TEG Still nt (Incident No.	Specifically, the Responde compounds ("VOC") and Compounds ("VOC") and Compounds ("Voc") and Compounds Point Nurus 365698) that occurred or and 56 minutes.	).001 lb of nber ("EPN")	
					E	Base Penalty	\$25,000
>> Env	ironmental, Prope	rty and Hum		Matrix			
	Release	Major	<b>Harm</b> Moderate	Minor			
OR	Actual			X			
	Potential				Percent 30.0	1%	
>>Proc	grammatic Matrix						
//P100	Falsification	Major	Moderate	Minor			
					Percent 0.0	<b>1</b> %	
	Matrix			•	ignificant amounts of pollu		
	Notes Notes	eveis that are pro		he violation.	environmental receptors a	s a result of	
				ne violation.			
				The Violation.			
				ne violation.	Adjustment	\$17,500	
				ne violation.	Adjustment	\$17,500	\$7,500
				ne violation.	Adjustment	\$17,500	\$7,500
Violatio	on Events			ne violation.	Adjustment	\$17,500	\$7,500
Violatio		Violation Events	1	ne violation.			\$7,500
Violatio		Violation Events	1	THE VIOLATION.	Adjustment  Number of violat		\$7,500
Violatio		daily	1	THE VIOLATION.			\$7,500
Violatio		daily weekly	1	THE VIOLATION.			\$7,500
Violatio		daily	1 x		1 Number of violat		\$7,500 \$7,500
Violatio		daily weekly monthly quarterly semiannual	1		1 Number of violat	ion days	
Violatio		daily weekly monthly quarterly semiannual annual	1		1 Number of violat	ion days	
Violatio		daily weekly monthly quarterly semiannual	1		1 Number of violat	ion days	
Violatio		daily weekly monthly quarterly semiannual annual single event	1 X	event is recom	1 Number of violat  Violation E	ion days	
	Number of \	daily weekly monthly quarterly semiannual annual single event	1 X		1 Number of violat  Violation E	ion days	
		daily weekly monthly quarterly semiannual annual single event	1  X  One monthly  25.0%	event is recom	1 Number of violat  Violation E	ion days Base Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event	1  X  One monthly  25.0%	event is recom	1 Number of violat  Violation E	ion days Base Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event	1  X  One monthly  25.0%	event is recom	1 Number of violat  Violation E	ion days Base Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event	1  X  One monthly  25.0%  fore NOE/NOV	event is recom	Number of violat  Violation E	ion days  Base Penalty  Reduction	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event    Extraordinary Ordinary N/A	1  X  One monthly  25.0%  fore NOE/NOV  X  The Respondence	event is recom	Number of violat  Violation E  mended.  P/Settlement Offer  the corrective measures boothe NOE dated December	Reduction	\$7,500
Good F	Number of \	daily weekly monthly quarterly semiannual annual single event   Extraordinary Ordinary N/A Notes	1  X  One monthly  25.0%  fore NOE/NOV  X  The Respond September 2	event is recom  NOE/NOV to EDPR  dent completed 21, 2021, prior to	Number of violat  Violation E  mended.  P/Settlement Offer  the corrective measures boothe NOE dated December 021.  Violat	Reduction  y ion Subtotal	\$7,500
Good F	Number of \	daily weekly monthly quarterly semiannual annual single event   Extraordinary Ordinary N/A Notes	1  X  One monthly  25.0%  fore NOE/NOV  X  The Respond September 2	event is recom  NOE/NOV to EDPR  dent completed 21, 2021, prior to	Number of violat  Violation E  mended.  P/Settlement Offer  the corrective measures boothe NOE dated December 121.	Reduction  y ion Subtotal	\$7,500 \$1,875
Good F	aith Efforts to Com	daily weekly monthly quarterly semiannual annual single event   Extraordinary Ordinary N/A Notes	1  X  One monthly  25.0%  fore NOE/NOV  X  The Respond September 2	event is recom  NOE/NOV to EDPR  dent completed 21, 2021, prior to	Number of violat  Violation E  mended.  P/Settlement Offer  the corrective measures boothe NOE dated December 021.  Violat	Reduction  Test	\$7,500 \$1,875 \$5,625
Good F	aith Efforts to Com	daily weekly monthly quarterly semiannual annual single event   Extraordinary Ordinary N/A Notes  This violation	25.0% one monthly  25.0% fore NOE/NOV  x  The Respond September 2	event is recom  NOE/NOV to EDPR  dent completed 21, 2021, prior to 9, 20  \$7,096	Number of violat  Violation E  mended.  P/Settlement Offer  the corrective measures boothe NOE dated December 021.  Violat  Statutory Line	Reduction  Subtotal  mit Test  enalty Total	\$7,500 \$1,875 \$5,625 \$7,125

	E	conomic	Benefit	Wor	rksheet		
Respondent	ETC Texas Pipe	eline, Ltd.					
Case ID No.	61726						
Reg. Ent. Reference No.	RN107716664						
Media	Air					Percent Interest	Years of
Violation No.	5					Percent Interest	Depreciation
						5.0	15
	<b>Item Cost</b>	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
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	<b>*</b> F0.000	20 Nov. 2010	21 C 2021	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	ANNUA	<b>LIZE</b> avoided c	osts before en	tering	item (except for	one-time avoide	d 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

Violation Description  Failed to prev 0.001 lb of H2 emissions ever 0.001 lb of H2 emissions eve	<b>Docket No.</b> 2021-1645-AIR-E	PCW
Reg. Ent. Reference No. Media Air Enf. Coordinator Yuliya Dunaway Violation Number Rule Cite(s)  Violation Description  Violation Description  Failed to prevo. 0.001 lb of H2 emissions ever 0.001 lb of H2 emissions e	line, Ltd. Policy	Revision 5 (January 28, 2021)
Media Air Enf. Coordinator Yuliya Dunaway Violation Number Rule Cite(s)  30 Tex. Admin. Registration No (b)(2) a  Violation Description  Failed to prev 0.001 lb of H2 emissions ever  >> Environmental, Property and Hum Release Major Actual Potential  >> Programmatic Matrix Falsification Major  Matrix Notes  Human health or the environm not exceed levels that are p  Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A	PC	W Revision February 11, 2021
Violation Number Rule Cite(s)  Violation Description  Violation Description  Violation Description  Pailed to prev 0.001 lb of H2 emissions ever 0.001 lb of		
Violation Number Rule Cite(s)  30 Tex. Admin. Registration No. (b)(2) a  Violation Description  Failed to prev. 0.001 lb of H2 emissions ever.  >> Environmental, Property and Hum  Release Major Actual Potential  >> Programmatic Matrix Falsification Major  Matrix Notes  Number of Violation Events  Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A		
Violation Description  Violation Description  Failed to previous of the previo		
Violation Description  Violation Description  Failed to prev. 0.001 lb of H2 emissions ever 0.00		<b>a</b>
Number of Violation Events   Semistron	Code §§ 116.115(c), 116.615(2), and 122.143(4), Standard Permit b. 123434, FOP No. O3840/GOP No. 514, Terms and Conditions Nos. nd (b)(9)(E)(ii), and Tex. Health & Safety Code § 382.085(b)	
OR  Release Major Actual Potential  >>Programmatic Matrix Falsification Major  Matrix Notes  Human health or the environmont exceed levels that are p  Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A	rent unauthorized emissions. Specifically, the Respondent released S and 669.76 lbs of VOC from the TEG Still Vent, EPN TO, during an at (Incident No. 365699) that began on January 19, 2021 and lasted five hours and 52 minutes.	
OR  Release Major Actual Potential  >>Programmatic Matrix Falsification Major  Matrix Notes  Human health or the environmont exceed levels that are p  Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A	Base Penalty	\$25,000
>>Programmatic Matrix Falsification Major Matrix Notes Human health or the environment exceed levels that are possible for the moving most exceed levels that are possible for the moving most exceed levels that are possible for the environment exceeds levels		
>>Programmatic Matrix Falsification Major Matrix Notes Human health or the environment exceed levels that are possible for the moving most exceed levels that are possible for the moving most exceed levels that are possible for the environment exceeds levels	<b>Harm</b> Moderate Minor	
>>Programmatic Matrix Falsification Major Matrix Notes Human health or the environment not exceed levels that are permanent of violation Events    Violation Events	X	
Matrix Notes  Human health or the environment exceed levels that are positive for the environment of Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A	<b>Percent</b> 30.0%	
Matrix Notes  Human health or the environment exceed levels that are positive for the environment of Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A		
Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  B Extraordinary Ordinary N/A	Moderate Minor	
Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  B Extraordinary Ordinary N/A	Percent 0.0%	
Violation Events  Number of Violation Events  daily weekly monthly quarterly semiannual annual single event  B Extraordinary Ordinary N/A		1
Number of Violation Events  daily weekly monthly quarterly semiannual annual single event   Good Faith Efforts to Comply  Extraordinary Ordinary N/A	nent has been exposed to insignificant amounts of pollutants that do rotective of human health or environmental receptors as a result of the violation.	
Number of Violation Events  daily weekly monthly quarterly semiannual annual single event   Good Faith Efforts to Comply  Extraordinary Ordinary N/A	Adjustment \$17,500	1
Number of Violation Events  daily weekly monthly quarterly semiannual annual single event   Good Faith Efforts to Comply  Extraordinary Ordinary N/A	Adjustment	
Number of Violation Events  daily weekly monthly quarterly semiannual annual single event   Good Faith Efforts to Comply  Extraordinary Ordinary N/A		\$7,500
daily weekly monthly quarterly semiannual annual single event   Good Faith Efforts to Comply   Extraordinary Ordinary N/A		
daily weekly monthly quarterly semiannual annual single event   Good Faith Efforts to Comply   Extraordinary Ordinary N/A	1 Number of violation days	
weekly monthly quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A	1 Number of violation days	
monthly quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A		
quarterly semiannual annual single event  Good Faith Efforts to Comply  Extraordinary Ordinary N/A		
Good Faith Efforts to Comply  Extraordinary Ordinary N/A	Violation Base Penalty	\$7,500
Good Faith Efforts to Comply  Extraordinary Ordinary N/A		4.7555
Good Faith Efforts to Comply  B Extraordinary Ordinary N/A		
B Extraordinary Ordinary N/A		
B Extraordinary Ordinary N/A	One monthly event is recommended.	
B Extraordinary Ordinary N/A	25.0% Reduction	\$1,875
Extraordinary Ordinary N/A	25.0% Reduction  efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	\$1,075
N/A		
	X	
Notes	The Respondent completed the corrective measures by	
	September 21, 2021, prior to the NOE dated December 9, 2021.	
	Violation Subtota	\$5,625
<b>Economic Benefit (EB) for this violati</b>	on Statutory Limit Test	
Estimated EB Amount	\$0 Violation Final Penalty Total	\$7,125
Estimated Estimated		
	This violation Final Assessed Penalty (adjusted for limits)	\$7,125
	on Statutory Limit Test	

	E	conomic	Benefit	Woı	rksheet		
Respondent		eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	Costs Saved	<b>EB Amount</b>
Item Description							
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		1		0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0 ¢0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs			See the Econor	mic Bene	efit in Violation No.	. 5.	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	terina	item (except for	one-time avoide	d 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	<b>Docket No.</b> 2021-1645-AIR-E	PCW
	Respondent	ETC Texas Pipeline, Ltd.	Policy Re	evision 5 (January 28, 2021)
	Case ID No.	61726	PCW	Revision February 11, 2021
Reg.	Ent. Reference No.	RN107716664		
	Media			
	<b>Enf. Coordinator</b>			
	Violation Number	<u> </u>		
	Rule Cite(s)	-		
			.6.115(c), 116.615(2), and 122.143(4), Standard Permit	
		-	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)	
		Failed to prevent unautho	orized emissions. Specifically, the Respondent released	
	Violation Description	362.34 lbs of VOC as fugi	tive emissions, during an emissions event (Incident No.	
	Violation Description	366450) that occurred	on November 20, 2018 and lasted three hours and 12	
			minutes.	
			Base Penalty	\$25,000
			base Femalty	\$25,000
>> Env	vironmental, Prope	rty and Human Healt	h Matrix	
		Harm		
OR	Release		Minor	
UK	Actual		X Payant 30.00/	
	Potential		Percent 30.0%	
>>Pro	grammatic Matrix			
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Falsification	Major Moderate	Minor	
			Percent 0.0%	
	Matrix Human health	or the environment has be	en exposed to insignificant amounts of pollutants that do	
	Notes not exceed I	evels that are protective of	human health or environmental receptors as a result of	
	Notes		the violation.	
			A discourant	
			Adjustment \$17,500	
				\$7,500
Violatio	on Events			
	Number of \	/iolation Events 1	1 Number of violation days	
	Number of v	Violation Events 1	Number of violation days	
		daily		
		weekly		
		monthly x		
		quarterly	Violation Base Penalty	\$7,500
		semiannual		
		annual		
		single event		
		One month	ly event is recommended.	
Good F	aith Efforts to Com	ply 25.0%	<b>6</b> Reduction	\$1,875
			/ NOE/NOV to EDPRP/Settlement Offer	, ,
		Extraordinary		
		Ordinary x		
		N/A		
			ndent completed the corrective measures by	
		Notes September	21, 2021, prior to the NOE dated December	
			9, 2021.	
			Walatian Cultural	4F C2F
			Violation Subtotal	\$5,625
Econon	nic Benefit (EB) for	r this violation	Statutory Limit Test	
	Estimate	ed EB Amount	\$0 Violation Final Penalty Total	<u>\$7 125</u>
	Estimate	ed EB Amount	\$0 Violation Final Penalty Total olation Final Assessed Penalty (adjusted for limits)	

	E	conomic	Benefit	Woı	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	61726						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
Delayed Costs		1		7	1 +0	1 +0 1	+0
Equipment				0.00	\$0 \$0	\$0	\$0 #0
Buildings Other (as needed)				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0 \$0	\$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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided co	osts before er			one-time avoided	
Disposal				0.00	\$0 ¢0	\$0 #0	\$0 #0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0 \$0	\$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	Docke	<b>t No.</b> 2021-1645-AIR-E	PCW
	_	ETC Texas Pipeline,			Policy Revision 5 (January 28, 2021)
	Case ID No.				PCW Revision February 11, 2021
Rea.	Ent. Reference No.				
	Media				
	Enf. Coordinator				
	Violation Number				
	Rule Cite(s)				
	Violation Description	Registration No. 123 (b)(2) and (b) Failed to prevent u 24,792.97 lbs of VO	(19)(E)(ii), and Tex. Heal nauthorized emissions. So from the TEG Still Ven	(2), and 122.143(4), Standard No. 514, Terms and Condition th & Safety Code § 382.085(b) specifically, the Respondent respondent respondent respondent and lasted 121 hours and l	leased s event
				Base	Penalty \$25,000
>> Fn:	vironmental, Prope	rty and Human	Health Matrix		
EII	in omnentar, Frope		arm		
0.0	Release		derate Minor		
OR	Actual		Х	Dorgont FO 00/	
	Potential			<b>Percent</b> 50.0%	
>>Pro	grammatic Matrix				
	Falsification	Major Mo	derate Minor		
				Percent 0.0%	
	Matrix		·	ificant amounts of pollutants w	
	Notes not exceed I	evels that are protect	the violation.	nvironmental receptors as a re	esult of
			the violation.		
				Adjustment	\$12,500
					\$12,500
Violati	on Events				
	Number of \	/iolation Events	1	6 Number of violation da	ays
		daily weekly			
		monthly	X		
		quarterly		Violation Base	<b>Penalty</b> \$12,500
		semiannual			-
		annual			
		single event			
		One	weekly event is recomm	ended.	
<b>Good F</b>	aith Efforts to Com	ply	25.0%	Re	eduction \$3,125
		Before I	NOE/NOV NOE/NOV to EDPRP	Settlement Offer	
		Extraordinary			
		Ordinary	Х		
		N/A	D		
				ne corrective measures by the NOE dated December	
		Notes	9, 2021, prior to		
				Violation S	<b>Subtotal</b> \$9,375
Econor	mic Benefit (EB) for	this violation		Statutory Limit 1	Test
	·				
	Estimate	ed EB Amount	\$0	Violation Final Penal	ty Total \$11,875

	E	conomic	Benefit	Woı	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	61726						
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	<b>Item Cost</b>	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
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 \$0	n/a	\$0
Permit Costs Other (as needed)				0.00	\$0 \$0	n/a n/a	\$0 \$0
Notes for DELAYED costs					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided co	osts before er			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0 #0	\$0 #0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0
Notes for AVOIDED costs				1 0.00	, <del> </del>	ų į	
Approx. Cost of Compliance		\$0			TOTAL		\$0

	E	conomic	Benefit	Woi	rksheet		
Respondent		eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.							-
Media Violation No.						Percent Interest	Years of
Violation No.	9					5.0	
	Ttom Cost	Data Baguirad	Final Date	Vec	Interest Saved	Costs Saved	EB Amount
Item Description	Item Cost	Date Required	rillai Date	115	Interest Saveu	Costs Saveu	EB Allioulit
Item Description							
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
 Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
<b>Engineering/Construction</b>				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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided c	<u>osts before en</u>	tering		one-time avoide	
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	\$0
Financial Assurance				0.00	\$0	\$0	\$0
ONE-TIME avoided costs				0.00	\$0 \$0	\$0 \$0	\$0 #0
Other (as needed)  Notes for AVOIDED costs		<u>.ll</u>		0.00	1 \$0	1 \$0	\$0
Approx. Cost of Compliance		\$0			TOTAL		\$0

	Е	conomic	Benefit	Woı	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	61726						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	EB Amount
Item Description							
Delayed Costs				=1			
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 ¢0	n/a n/a	\$0
Record Keeping System Training/Sampling				0.00	\$0 \$0	n/a	\$0 \$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	ANNUL				efit in Violation No		d aceta)
Avoided Costs	ANNU	ALIZE avoided C	osts before er			one-time avoided	
Disposal Personnel				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment				0.00	\$0	\$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

	E	conomic	<b>Benefit</b>	Woı	rksheet		
Respondent		eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.							
Media						<b>Percent Interest</b>	Years of Depreciation
Violation No.	11						•
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
Delayed Costs		1		1 0 00	T +0	L +0	<b>+0</b>
Equipment Buildings				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Other (as needed)		1		0.00	\$0 \$0	\$0	\$0 \$0
Engineering/Construction		1		0.00	\$0	\$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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided c	<u>osts before er</u>			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0	\$0 \$0
Financial Assurance				0.00	\$0	\$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

	E	conomic	Benefit	Woi	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	61726						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description							
Delayed Costs		11 11		7			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed) Engineering/Construction		<del> </del>		0.00	\$0 \$0	\$0 \$0	\$0 \$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling		i		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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided co	osts before er			one-time avoide	
Disposal		<u> </u>		0.00	\$0	\$0	\$0
Personnel Inspection/Reporting/Sampling				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/Equipment		1		0.00	\$0	\$0 \$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
		ETC Texas Pipeline, Ltd.	Policy Ro	evision 5 (January 28, 2021)
	Case ID No.	61726	PCW	Revision February 11, 2021
Reg.	Ent. Reference No.	RN107716664		
	Media	Air		
	<b>Enf. Coordinator</b>	Yuliya Dunaway		
	<b>Violation Number</b>			
	Rule Cite(s)	30 Tex. Admin. Code 88 116	6.115(c), 116.615(2), and 122.143(4), Standard Permit	
		55	OP No. O3840/GOP No. 514, Terms and Conditions Nos.	
			(ii), and Tex. Health & Safety Code § 382.085(b)	
			wined envioring. Considerable the Decreadest valored	
		•	rized emissions. Specifically, the Respondent released he TEG Still Vent, EPN TO, during an emissions event	
	<b>Violation Description</b>		occurred on March 31, 2020 and lasted three hours and	
		,	42 minutes.	
	'			
			Base Penalty	\$25,000
>> Env	vironmental, Prope	rty and Human Health	n Matrix	
	D-1	Harm Major Moderate	Minor	
OR	<b>Release</b> Actual	-	Minor	
	Potential		Percent 30.0%	
>>Pro	grammatic Matrix			
	Falsification	Major Moderate	Minor	
			Percent 0.0%	
	Human health	or the environment has bee	n exposed to insignificant amounts of pollutants that do	
	not exceed I		uman health or environmental receptors as a result of	
	Notes		the violation.	
			Adjustment \$17,500	
				\$7,500
Violati	on Events			
Violati	on Events			
	Number of \	/iolation Events 1	1 Number of violation days	
		de the	7	
		daily weekly		
		monthly x		
		quarterly	Violation Base Penalty	\$7,500
		semiannual		
		annual		
		single event		
		One monthly	y event is recommended.	
		_		
Good F	aith Efforts to Com	ply 25.0%  Before NOE/NOV		\$1,875
		Extraordinary Extra	NOL/NOV to EDITA-/ Settlement Offer	
		Ordinary x		
		N/A		
			dent completed the corrective measures by	
		•	21, 2021, prior to the NOE dated December	
			9, 2021.	
			Violation Subtotal	\$5,625
Econom	nic Ronofit (ED) for	thic violation		
ECOHOL	nic Benefit (EB) for		Statutory Limit Test	
	Estimate	ed EB Amount	\$0 Violation Final Penalty Total	\$7,125
		This vio	lation Final Assessed Penalty (adjusted for limits)	\$7,125

	E	conomic	Benefit	Woi	rksheet		
Respondent	ETC Texas Pip	eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.							
Media	Air					Percent Interest	Years of
Violation No.	13						Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided c	<u>osts before er</u>			one-time avoide	
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	\$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$0	\$0 \$0
Other (as needed)  Notes for AVOIDED costs		<u>JI</u>		<u> </u>	1 \$0	<u>  \$0</u>	\$U
Approx. Cost of Compliance		\$0			TOTAL		\$0

	Screening Date		<b>Docket No.</b> 2021-1645-AIR-E	PCW
	<del>-</del>	ETC Texas Pipeline, Ltd.	Policy Re	evision 5 (January 28, 2021)
	Case ID No.		PCW	Revision February 11, 2021
Reg. I	Ent. Reference No.			
	Media			
	Enf. Coordinator			
	Violation Number			
	Rule Cite(s)		16.115(c), 116.615(2), and 122.143(4), Standard Permit	
			FOP No. O3840/GOP No. 514, Terms and Conditions Nos.	
		(b)(2) and (b)(9)(E	E)(ii), and Tex. Health & Safety Code § 382.085(b)	
		F 11 11 11 11 11		
		750 11 lbs of VOC from	norized emissions. Specifically, the Respondent released the TEG Still Vent, EPN TO, during an emissions event	
	<b>Violation Description</b>		at occurred on May 20, 2020 and lasted five hours and 26	
		,	minutes.	
	'			+25.000
			Base Penalty	\$25,000
>> Env	rironmental, Prope	rty and Human Heal	th Matrix	
		Harm		
OR	<b>Release</b> Actual			
OK	Potential		Percent 30.0%	
	i occirciai		1 er cent 30.0 %	
>>Prog	grammatic Matrix			
	Falsification	Major Moderate		
			Percent 0.0%	
	Human hoalth	or the environment has be	een exposed to insignificant amounts of pollutants that do	
	Matrix not exceed I		human health or environmental receptors as a result of	
	Notes		the violation.	
			Adjustment \$17,500	
			Adjustment \$17,500	\$7,500
			Adjustment \$17,500	\$7,500
Violatio	on Events		Adjustment \$17,500	\$7,500
Violatio		/iolation Events 1		\$7,500
Violatio		/iolation Events 1	Adjustment \$17,500	\$7,500
Violatio		/iolation Events 1		\$7,500
Violatio		daily weekly		\$7,500
Violatio		daily weeklyx	1 Number of violation days	
Violatio		daily weekly monthly x quarterly		\$7,500 \$7,500
Violatio		daily weeklyx	1 Number of violation days	
Violatio		daily weekly monthly quarterly semiannual	1 Number of violation days	
Violatio		daily weekly monthly quarterly semiannual annual	1 Number of violation days	
Violatio		daily weekly monthly quarterly semiannual annual single event	1 Number of violation days	
Violatio		daily weekly monthly quarterly semiannual annual single event	1 Number of violation days  Violation Base Penalty	
	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont	1 Number of violation days  Violation Base Penalty  hly event is recommended.	\$7,500
		daily weekly monthly quarterly semiannual annual single event  One mont	1 Number of violation days  Violation Base Penalty  hly event is recommended.	
	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont	1 Number of violation days  Violation Base Penalty  hly event is recommended.  Reduction	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont  Extraordinary Ordinary  X  Very Company  April 25.00  Before NOE/NO  Extraordinary  Ordinary X	1 Number of violation days  Violation Base Penalty  hly event is recommended.  Reduction	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont  Semiannual Apply  One mont  One mont  One mont  One mont  One mont  One mont	1 Number of violation days  Violation Base Penalty  hly event is recommended.  Reduction  NOE/NOV to EDPRP/Settlement Offer	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont  Semiannual Apply  One mont  One mont  One mont  The Respect of the Note of th	Number of violation days  Violation Base Penalty  hly event is recommended.  Reduction  NOE/NOV to EDPRP/Settlement Offer  ondent completed the corrective measures by	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont  Semiannual Apply  One mont  One mont  One mont  The Respect of the Note of th	1 Number of violation days  Violation Base Penalty  hly event is recommended.  Reduction  NOE/NOV to EDPRP/Settlement Offer	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont  Semiannual Apply  One mont  One mont  One mont  The Respect of the Note of th	Violation Base Penalty  hly event is recommended.  Reduction  NOE/NOV to EDPRP/Settlement Offer  ondent completed the corrective measures by er 21, 2021, prior to the NOE dated December 9, 2021.	\$7,500 \$1,875
	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont  Semiannual Apply  One mont  One mont  One mont  The Respect of the Note of th	Violation Base Penalty  Number of violation days  Violation Base Penalty  Noewness recommended.  Reduction  Noewness by Noewness by Per 21, 2021, prior to the NOE dated December	\$7,500
Good F	Number of \	daily weekly monthly quarterly semiannual annual single event  One mont  September  One Mont  One Mont  One Mont  The Response September  One Mont  September  One Mont  One Mont  One Mont  September  One Mont  One Mont  One Mont  September  One Mont  One M	Violation Base Penalty  hly event is recommended.  Reduction  NOE/NOV to EDPRP/Settlement Offer  ondent completed the corrective measures by er 21, 2021, prior to the NOE dated December 9, 2021.	\$7,500 \$1,875
Good F	nic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event  One mont  September  This violation	Number of violation days  Violation Base Penalty  hly event is recommended.  Reduction  NOE/NOV to EDPRP/Settlement Offer  ondent completed the corrective measures by er 21, 2021, prior to the NOE dated December 9, 2021.  Violation Subtotal  Statutory Limit Test	\$7,500 \$1,875 \$5,625
Good F	nic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event  One mont  September  One Mont  One Mont  One Mont  The Response September  One Mont  September  One Mont  One Mont  One Mont  September  One Mont  One Mont  One Mont  September  One Mont  One M	Violation Base Penalty  Number of violation days  Violation Base Penalty  Reduction  NOE/NOV to EDPRP/Settlement Offer  Ondent completed the corrective measures by er 21, 2021, prior to the NOE dated December 9, 2021.  Violation Subtotal	\$7,500 \$1,875

	E	conomic	Benefit	Woı	rksheet		
Respondent		eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.  Media  Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		•					
_							
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 Record Keeping System				0.00	\$0 \$0	n/a n/a	\$0 \$0
Training/Sampling				0.00	\$0	n/a	\$0 \$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 Econon	nic Bene	efit in Violation No.	5.	
Avoided Costs	ANNU	ALIZE avoided c	osts before en			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 #0	\$0 #0	\$0 \$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$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 N	<b>0.</b> 2021-1645-AIR-E		PCW
	Respondent		line, Ltd.			Policy Revision	n 5 (January 28, 2021)
	Case ID No.	61726				PCW Revis	sion February 11, 2021
Reg. l	Ent. Reference No.	RN107716664					
	Media	Air					
	Enf. Coordinator	Yuliya Dunaway	У				
	<b>Violation Number</b>						
	Rule Cite(s)	30 Tev Admin	Code 88 116	5 115(c) 116 615(2)	and 122.143(4), Standard	l Permit	
					. 514, Terms and Condition		
		_			Safety Code § 382.085(b)		
		(1)(1)	- (-)(-)(-)(-)(-)		, 5(.,		
					ifically, the Respondent rele		
	<b>Violation Description</b>				TO, during an emissions e		
		(Incident No.	300472) that	46 minutes.	2020 and lasted three hour	rs and	
				40 minutes.			
					Base P	Penalty	\$25,000
=							
>> Env	vironmental, Prope	rty and Hun		n Matrix			
	Release	Major	<b>Harm</b> Moderate	Minor			
OR	Actual			X			
	Potential				Percent 30.0%		
_							
>>Prog	grammatic Matrix	Majau	Madausta	Minau			
	Falsification	Major	Moderate	Minor	Percent 0.0%		
					0.070		
	Human health	or the environr	ment has beer	n exposed to insignific	ant amounts of pollutants	that do	
	matrix not exceed I				nmental receptors as a res		
	Notes		t	the violation.			
	<u> </u>						
					Adjustment \$	\$17,500	
					Adjustment \$	17,500	\$7,500
					Adjustment \$	\$17,500	\$7,500
Violatio	on Events				Adjustment \$	\$17,500	\$7,500
Violatio		/iolation Events	1				\$7,500
Violatio		/iolation Events	1	1	Adjustment \$  Number of violation da		\$7,500
Violatio		/iolation Events daily	1				\$7,500
Violatio			1	1			\$7,500
Violatio		daily weekly monthly	1 x		Number of violation da	ys	
Violatio		daily weekly monthly quarterly				ys	\$7,500 \$7,500
Violatio		daily weekly monthly quarterly semiannual			Number of violation da	ys	
Violatio		daily weekly monthly quarterly semiannual annual			Number of violation da	ys	
Violatio		daily weekly monthly quarterly semiannual			Number of violation da	ys	
Violatio		daily weekly monthly quarterly semiannual annual	X		Number of violation da	ys	
Violatio		daily weekly monthly quarterly semiannual annual	X	1  y event is recommend	Number of violation da	ys	
	Number of \	daily weekly monthly quarterly semiannual annual single event	X One monthly	1  y event is recommend	Number of violation da  Violation Base P	Penalty	\$7,500
		daily weekly monthly quarterly semiannual annual single event	One monthly	1 y event is recommend	Number of violation da  Violation Base P  ed.	ys	
	Number of \	daily weekly monthly quarterly semiannual annual single event	One monthly	1  y event is recommend	Number of violation da  Violation Base P  ed.	Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event	One monthly  25.0%  Sefore NOE/NOV	1 y event is recommend	Number of violation da  Violation Base P  ed.	Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event  aply  Extraordinary Ordinary	One monthly  25.0%  Sefore NOE/NOV	1 y event is recommend	Number of violation da  Violation Base P  ed.	Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event	One monthly  25.0%  Sefore NOE/NOV	y event is recommend  NOE/NOV to EDPRP/Settl	Number of violation date  Violation Base P  ed.  Recement Offer	Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event  aply  Extraordinary Ordinary	One monthly  25.0%  Sefore NOE/NOV  X  The Respon	y event is recommend  NOE/NOV to EDPRP/Settl  dent completed the co	Number of violation da  Violation Base P  ed.	Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event     Extraordinary  Ordinary N/A	One monthly  25.0%  Sefore NOE/NOV  X  The Respon	y event is recommend  NOE/NOV to EDPRP/Settl  dent completed the co	Violation Base P  ed.  Recement Offer  orrective measures by	Penalty	\$7,500
	Number of \	daily weekly monthly quarterly semiannual annual single event     Extraordinary  Ordinary N/A	One monthly  25.0%  Sefore NOE/NOV  X  The Respon	v event is recommend  NOE/NOV to EDPRP/Settl  dent completed the co	Violation Base P  ed.  Recement Offer  orrective measures by NOE dated December	Penalty duction	\$7,500 \$1,875
	Number of \	daily weekly monthly quarterly semiannual annual single event     Extraordinary  Ordinary N/A	One monthly  25.0%  Sefore NOE/NOV  X  The Respon	v event is recommend  NOE/NOV to EDPRP/Settl  dent completed the co	Violation Base P  ed.  Recement Offer  orrective measures by	Penalty duction	\$7,500
Good F	Number of \	daily weekly monthly quarterly semiannual annual single event   Extraordinary Ordinary N/A Notes	One monthly  25.0%  Sefore NOE/NOV  X  The Respon September 2	v event is recommend  NOE/NOV to EDPRP/Settl  dent completed the co	Violation Base P  ed.  Recement Offer  prrective measures by NOE dated December  Violation Su	Penalty duction	\$7,500 \$1,875
Good F	nic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event   B Extraordinary Ordinary N/A Notes	One monthly  25.0%  Sefore NOE/NOV  X  The Respon September 2	y event is recommend  NOE/NOV to EDPRP/Settl  dent completed the co 21, 2021, prior to the 9, 2021.	Violation Base P  ed.  Recement Offer  Orrective measures by NOE dated December  Violation Su  Statutory Limit T	Penalty duction btotal est	\$7,500 \$1,875 \$5,625
Good F	nic Benefit (EB) for	daily weekly monthly quarterly semiannual annual single event   Extraordinary Ordinary N/A Notes	One monthly  25.0%  Sefore NOE/NOV  X  The Respon September 2	v event is recommend  NOE/NOV to EDPRP/Settl  dent completed the co	Violation Base P  ed.  Recement Offer  prrective measures by NOE dated December  Violation Su	Penalty duction btotal est	\$7,500 \$1,875

	E	conomic	Benefit	Woi	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	61726						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	<b>EB Amount</b>
Item Description							
Delayed Costs				=1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 #0	\$0 #0	\$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided c	<u>osts before er</u>			one-time avoide	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0	\$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Financial Assurance				0.00	\$0 \$0	\$0 \$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

	E	conomic	<b>Benefit</b>	Wor	rksheet		
Respondent		eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
_							
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		1		0.00	\$0	n/a	\$0
Record Keeping System Training/Sampling				0.00	\$0 \$0	n/a n/a	\$0 \$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 Econor	mic Bene	efit in Violation No.	5.	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	ntering	item (except for	one-time avoided	d 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)  Notes for AVOIDED costs		<u> </u>		0.00	\$0	\$0	\$0
Approx. Cost of Compliance		\$0			TOTAL		\$0

	Screening Date	17-Dec-2021		Docket No.	2021-1645-AIR-E		PCW
	Respondent	ETC Texas Pipeline,	Ltd.			Policy Re	evision 5 (January 28, 2021)
	Case ID No.	61726				PCW	Revision February 11, 2021
Reg.	<b>Ent. Reference No.</b>	RN107716664					
	Media	Air					
	<b>Enf. Coordinator</b>	Yuliya Dunaway					
	<b>Violation Number</b>	17					
	Rule Cite(s)						
		Registration No. 123 (b)(2) and (b	3434, FOP ))(9)(E)(ii),	.15(c), 116.615(2), and No. O3840/GOP No. 51, and Tex. Health & Saf	14, Terms and Conditi fety Code § 382.085(	ons Nos. b)	
	Violation Description	476.30 lbs of VO	from the	ed emissions. Specifica TEG Still Vent, EPN TO curred on July 2, 2020 minutes.	, during an emissions	event	
					Base	Penalty	\$25,000
>> Env	vironmental, Prope	-		Matrix			
	Delegas		arm dorato	Minor			
OR	<b>Release</b> Actual	-	derate	Minor x			
	Potential			^	Percent 30.0%		
>>Pro	grammatic Matrix						
	Falsification	Major Mo	derate	Minor			
					Percent 0.0%		
	Matrix		ive of hum	exposed to insignificant nan health or environm e violation.	•		
				Adj	justment	\$17,500	
							+7.500
						L	\$7,500
Violati	on Events						
	Number of \	/iolation Events	1	1	Number of violation of	lays	
		daily					
		daily weekly					
		monthly	Х				
		quarterly			<b>Violation Base</b>	Penalty	\$7,500
		semiannual					
		annual					
		single event					
		One	monthly e	event is recommended.			
Cood	aith Effactata Carr	m ly c	25 22				44 075
900a F	aith Efforts to Com		<b>25.0%</b> NOE/NOV N	IOE/NOV to EDPRP/Settleme		Reduction	\$1,875
		Extraordinary	NOL/NOV N	OL/NOV to LDPRP/Settleme	int Onei		
		Ordinary	Х				
		N/A	A				
			Responde	ent completed the corre	ective measures by		
		Notes Sep	tember 21	, 2021, prior to the NO 9, 2021.	E dated December		
				·	Violation	Subtotal	\$5,625
Econor	mic Benefit (EB) for	this violation			<b>Statutory Limit</b>		
	-				•	_	
	Estimate	ed EB Amount		\$0 <b>\</b>	/iolation Final Pena	Ity Total	\$7,125
		7	his violat	tion Final Assessed P	enalty (adjusted fo	r limits)	\$7,125

	E	conomic	Benefit	Woı	rksheet		
Respondent	ETC Texas Pip	eline, Ltd.					
Case ID No.	61726						
Reg. Ent. Reference No.	RN107716664						
Media Violation No.	Air					Percent Interest	Years of Depreciation
Violation No.	_,					5.0	15
	Item Cost	Date Required	Final Date	Yrs	<b>Interest Saved</b>	Costs Saved	EB Amount
Item Description		•					
<u> </u>							
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 Econor	mic Bene	efit in Violation No.	. 5.	
Avoided Costs	ANNU	<b>ALIZE avoided c</b>	osts before er		item (except for	one-time avoided	d 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

Respondent Case ID No. 61726 PCW Revision 5 (January 28, PCW Revision 5 (January 28, PCW Revision February 11 Reg. Ent. Reference No. Media Air  Enf. Coordinator Yuliya Dunaway  Violation Number 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)	1
Reg. Ent. Reference No. Media  Enf. Coordinator  Violation Number  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.	, 2021
Media Enf. Coordinator Yuliya Dunaway Violation Number 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.	
Media Enf. Coordinator Yuliya Dunaway Violation Number 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.	
Violation Number 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.	
Violation Number  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.	
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.	
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.	
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.	
	5,000
>> Environmental, Property and Human Health Matrix	
Harm Release Major Moderate Minor	
OR 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	
Adjustment #17,500	
<b>\$</b>	7,500
Violatian Frants	
Violation Events	
Number of Violation Events 1 Number of violation days	
Number of Violation Events 1	
daily	
weekly	
monthly x	
	7,500
semiannual	
annual single event	
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	
Fortune and the arm of the second sec	
Extraordinary	
Ordinary x	
Ordinary x N/A	
Ordinary x  N/A  The Respondent completed the corrective measures by	
Ordinary x  N/A  The Respondent completed the corrective measures by Notes September 21, 2021, prior to the NOE dated December	
Ordinary x  N/A  The Respondent completed the corrective measures by	
Ordinary x  N/A  The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.	5.625
Ordinary x  N/A  The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.  Violation Subtotal \$	5,625
Ordinary x  N/A  The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.	5,625
Ordinary x N/A  The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.  Violation Subtotal \$  Economic Benefit (EB) for this violation  Statutory Limit Test	5,625 7,125
Ordinary x N/A  The Respondent completed the corrective measures by September 21, 2021, prior to the NOE dated December 9, 2021.  Violation Subtotal \$  Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$0 Violation Final Penalty Total \$	

	Е	conomic	Benefit	Woı	ksheet		
Respondent		eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.		•					
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
Delayed Costs				-1			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 #0	\$0 #0	\$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Record Keeping System				0.00	\$0 \$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					efit in Violation No.		
Avoided Costs	ANNU	ALIZE avoided co	osts before en			one-time avoided	
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0 #0	\$0 #0	\$0
Inspection/Reporting/Sampling Supplies/Equipment				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Financial Assurance				0.00	\$0 \$0	\$0 \$0	\$0 \$0
ONE-TIME avoided costs				0.00	\$0	\$0 \$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. 20	21-1645-AIR-E	PCW
	Respondent	ETC Texas Pipeline, Ltd.		Policy	Revision 5 (January 28, 2021)
	Case ID No.	61726		PC	CW Revision February 11, 2021
Reg.	Ent. Reference No.	RN107716664			
	Media				
	Enf. Coordinator				
	Violation Number				<b>-</b>
	Rule Cite(s)		5.115(c), 116.615(2), and 1	22 143(4) Standard Permi	+
		55	OP No. O3840/GOP No. 514,	· //	
			(ii), and Tex. Health & Safety		
				· · · · · ·	
		•	rized emissions. Specifically,	•	
	<b>Violation Description</b>		he TEG Still Vent, EPN TO, d t occurred on September 4,		
		(including 1401 300 177) that	and six minutes.	2020 and lasted six floars	
	•				
				Base Penalty	\$25,000
>> Env	vironmental, Prope	rty and Human Healtl	n Matrix		
	Dalanas	Harm Maior Madarata	Minau		
OR	<b>Release</b> Actual	Major Moderate	Minor X		
	Potential			ercent 30.0%	
>>Prog	grammatic Matrix				
	Falsification	Major Moderate	Minor	ercent 0.0%	
			Pe	0.0%	
	Human health	or the environment has bee	n exposed to insignificant an	nounts of pollutants that do	
	Matrix not exceed le	evels that are protective of h	•	•	
	Notes		the violation.		
			Adjus	<b>tment</b> \$17,500	
					\$7,500
Violatio	on Events				
Violatio	on Events				
	Number of V	/iolation Events 1	1 Nu	imber of violation days	
		daily	1		
		weekly	1		
		monthly x	1		
		quarterly		<b>Violation Base Penalty</b>	\$7,500
		semiannual			
		annualsingle event	-		
		Single event	<u> </u>		
		One monthl	y event is recommended.		
Good F	aith Efforts to Com		<b>-</b> }	Reduction	\$1,875
			NOE/NOV to EDPRP/Settlement (	Offer	
		Extraordinary			
		Ordinary x N/A			
			dent completed the corrective	ve measures by	
			21, 2021, prior to the NOE of		
			9, 2021.		
				Violation Subtota	\$5,625
					• φυ,υευ
Econon	nic Benefit (EB) for	this violation	St	tatutory Limit Test	
	Estimate	ed EB Amount	\$0 Vio	lation Final Penalty Tota	<b>I</b> \$7,125
		This vio	lation Final Assessed Pen	alty (adjusted for limite	\$7,125
		THIS VIO	on i mai Assesseu Pen	arry (adjusted for illilles	φ/,123

	Е	conomic	Benefit	Wor	ksheet		
Respondent		eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.		ŀ					
Media Violation No.						Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	<b>Final Date</b>	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
Delayed Costs							
<sup>*</sup> 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 \$0	n/a	\$0
Training/Sampling Remediation/Disposal				0.00	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs				0.00	\$0 \$0	n/a	\$0
Other (as needed)				0.00	\$0	n/a	\$0
Notes for DELAYED costs			See the Econor	nic Bene	efit in Violation No.	5.	
Avoided Costs	ANNU	ALIZE avoided c	osts before en	tering	item (except for	one-time avoided	l 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)  Notes for AVOIDED costs		JI II		0.00	\$0	\$0	\$0
Approx. Cost of Compliance		\$0			TOTAL		\$0

	E	conomic	<b>Benefit</b>	Wo	rksheet		
Respondent		eline, Ltd.					
Case ID No.							
Reg. Ent. Reference No.							
Media Violation No.						<b>Percent Interest</b>	Years of Depreciation
Violation No.	20					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
Item Description		•					
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 Econor	mic Bene	efit in Violation No.	5.	
Avoided Costs	ANNU	ALIZE avoided c	osts before er	tering		one-time avoide	d 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

	E	conomic	<b>Benefit</b>	Woı	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	61726						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	<b>EB Amount</b>
Item Description							
Delayed Costs				_			
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0 ¢0	\$0 #0	\$0 \$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$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	ANNUL				efit in Violation No.	5. one-time avoided	L costs)
Avoided Costs Disposal	ANNU	ALIZE avoided C	osts before er	0.00	\$0	\$0	\$0
Personnel				0.00	\$0 \$0	\$0	\$0 \$0
Inspection/Reporting/Sampling				0.00	\$0 \$0	\$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

	E	conomic	Benefit	Woı	rksheet		
Respondent Case ID No. Reg. Ent. Reference No.	61726						
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	<b>Date Required</b>	Final Date	Yrs	<b>Interest Saved</b>	<b>Costs Saved</b>	EB Amount
Item Description							
Delayed Costs		-Ir		7	T +0	1 +0 1	+0
Equipment				0.00	\$0	\$0	\$0 ¢0
Buildings Other (as needed)				0.00	\$0 \$0	\$0 \$0	<u>\$0</u> \$0
Engineering/Construction				0.00	\$0 \$0	\$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  Avoided Costs	ANNU				efit in Violation No.	. 5. one-time avoided	i 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)  Notes for AVOIDED costs		<u>JI JI</u>		0.00	\$0	\$0	\$0
Approx. Cost of Compliance		\$0			TOTAL		\$0

To request a more accessible version of this report, please contact the TCEQ Help Desk at (512) 239-4357.



# 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, CN601587652, ETC Texas Pipeline, Ltd. Classification: SATISFACTORY Rating: 1.01

or Owner/Operator:

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

HSA001

**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:

#### 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	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
ETC TEXAS PIPELINE, LTD.	§	
RN107716664	§	ENVIRONMENTAL QUALITY

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

## I. JURISDICTION AND STIPULATIONS

On	the Texas Commission on Environmental Quality ("the
Commission" or "To	CEQ") considered this agreement of the parties, resolving an enforcement
action regarding ET	C Texas Pipeline, Ltd. (the "Respondent") under the authority of Tex. HEALTH
& SAFETY CODE ch. 3	82 and Tex. Water Code ch. 7. The Executive Director of the TCEQ, through
the Enforcement Di	vision, 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. 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). 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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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. O3840/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

ETC Texas Pipeline, Ltd. DOCKET NO. 2021-1645-AIR-E Page 7

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.

ETC Texas Pipeline, Ltd. DOCKET NO. 2021-1645-AIR-E Page 8

## SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	Date				
(Ma)	7/22/2024				
For the Executive Director	Date				
the attached Order, and I do agree to the	tand the attached Order. I am authorized to agree to terms and conditions specified therein. I further payment for the penalty amount, is materially relying				
I also understand that failure to comply and/or failure to timely pay the penalty a	with the Ordering Provisions, if any, in this Order amount, may result in:				
<ul> <li>A negative impact on compliance history;</li> <li>Greater scrutiny of any permit applications submitted;</li> <li>Referral of this case to the OAG for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;</li> <li>Increased penalties in any future enforcement actions;</li> <li>Automatic referral to the OAG of any future enforcement actions; and</li> <li>TCEQ seeking other relief as authorized by law.</li> </ul>					
In addition, any falsification of any comp	oliance documents may result in criminal prosecution.				
Signature	07/61/2624 Date				
Chief Inglis	UP of Ops				
Name (Printed or typed)	Title				
Authorized Representative of					
ETC Texas Pipeline, Ltd.					

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

#### 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:	Texas PTA Clean School Bus Replacement Program
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.

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#### 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 ETC Texas Pipeline, Ltd. Docket No. 2021-1645-AIR-E Agreed Order - Attachment A

### 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 Incident No. 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, 20		
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	