

Executive Summary – Enforcement Matter – Case No. 63823

JGE Gas Solutions, LP

RN100237502

Docket No. 2023-0434-AIR-E

Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

AIR

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Longview Gas Plant, 3407 West Camp Switch Road, Longview, Gregg County

Type of Operation:

Natural gas 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 25, 2025

Comments Received: No

Penalty Information

Total Penalty Assessed: \$31,590

Amount Deferred for Expedited Settlement: \$6,318

Total Paid to General Revenue: \$25,272

Total Due to General Revenue: \$0

Payment Plan: N/A

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: March 15, 2023

Date(s) of NOE(s): March 22, 2023

Executive Summary – Enforcement Matter – Case No. 63823
JGE Gas Solutions, LP
RN100237502
Docket No. 2023-0434-AIR-E

Violation Information

1. Failed to report each instance of deviation from the emission and operating limitations. Specifically, the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the July 1, 2021 through December 31, 2021 reporting period did not include the deviation for failing to demonstrate continuous compliance with the catalyst inlet temperature limit from August 30, 2021 to September 1, 2021 for the Waukesha L7042G Engine C-28 [30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 63.6640(b), Federal Operating Permit ("FOP") No. O3097, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") Nos. 1.A and 1.E, and TEX. HEALTH & SAFETY CODE § 382.085(b)].
2. Failed to postmark or submit the semiannual compliance report no later than July 31 or January 31 following the end of the semiannual reporting period. Specifically, the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the January 1, 2021 through June 30, 2021 reporting period was not postmarked or submitted to the TCEQ by July 31, 2021 [30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6650(b)(2)(4), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and TEX. HEALTH & SAFETY CODE § 382.085(b)].
3. Failed to maintain the catalyst inlet temperature greater than or equal to 750 degrees Fahrenheit ("°F"). Specifically, the Respondent did not maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L7042G Engine C-28 when the catalyst inlet temperature was less than 750°F for a total of 21 hours and 45 minutes on seven days from March 7, 2022 to May 25, 2022 [30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6640(a), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and TEX. HEALTH & SAFETY CODE § 382.085(b)].
4. Failed to maintain the catalyst inlet temperature greater than or equal to 750°F. Specifically, the Respondent did not maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L5790G Engine C-04 when the catalyst inlet temperature was less than 750°F for a total of 61 hours and 15 minutes on six days from March 14, 2022 to March 22, 2022 [30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6640(a), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

N/A

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RN100237502

Docket No. 2023-0434-AIR-E

Technical Requirements:

The Order will require the Respondent to:

a. Within 30 days:

i. Submit a revised 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the July 1, 2021 through December 31, 2021 reporting period to report the deviation for failing to demonstrate continuous compliance with the catalyst inlet temperature limit from August 30, 2021 to September 1, 2021 for the Waukesha L7042G Engine C-28;

ii. Submit the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the January 1, 2021 through June 30, 2021 reporting period;

iii. Maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L7042G Engine C-28; and

iv. Maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L5790G Engine C-04.

b. Within 45 days, submit written certification to demonstrate compliance with a.

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Johnnie Wu, Enforcement Division, Enforcement Team 2, MC 219, (512) 239-2524; Michael Parrish, Enforcement Division, MC 219, (512) 239-2548

Respondent: Cristiano M. Beraldo, Chief Executive Officer, JGE Gas Solutions, LP, 5847 San Felipe Street, Suite 2850, Houston, Texas 77057

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 5 (January 28, 2021)

PCW Revision February 11, 2021

DATES	Assigned	27-Mar-2023	Screening	28-Mar-2023	EPA Due	
	PCW	11-Mar-2025				

RESPONDENT/FACILITY INFORMATION			
Respondent	JGE Gas Solutions, LP		
Reg. Ent. Ref. No.	RN100237502		
Facility/Site Region	5-Tyler	Major/Minor Source	Major

CASE INFORMATION			
Enf./Case ID No.	63823	No. of Violations	4
Docket No.	2023-0434-AIR-E	Order Type	1660
Media Program(s)	Air	Government/Non-Profit	No
Multi-Media		Enf. Coordinator	Johnnie Wu
		EC's Team	Enforcement Team 2
Admin. Penalty \$ Limit Minimum	\$0	Maximum	\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)	Subtotal 1	\$20,250
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ADJUSTMENTS (+ / -) TO SUBTOTAL 1

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

Compliance History	56.0 %	Adjustment	Subtotals 2, 3, & 7	\$11,340
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Notes

Enhancement for two NOV's with same/similar violations, three NOV's with dissimilar violations, and two orders containing a denial of liability.

Culpability	No	0.0 %	Enhancement	Subtotal 4	\$0
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Notes

The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments	Subtotal 5	\$0
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Economic Benefit	0.0 %	Enhancement*	Subtotal 6	\$0
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Total EB Amounts
Estimated Cost of Compliance

\$3,810
\$20,500

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7	Final Subtotal	\$31,590
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OTHER FACTORS AS JUSTICE MAY REQUIRE	0.0 %	Adjustment	\$0
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Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount	\$31,590
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STATUTORY LIMIT ADJUSTMENT	Final Assessed Penalty	\$31,590
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DEFERRAL	20.0 %	Reduction	Adjustment	-\$6,318
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Reduces the Final Assessed Penalty by the indicated percentage.

Notes

Deferral offered for expedited settlement.

PAYABLE PENALTY	\$25,272
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Screening Date	28-Mar-2023	Docket No.	2023-0434-AIR-E	PCW
Respondent	JGE Gas Solutions, LP	<i>Policy Revision 5 (January 28, 2021)</i>		
Case ID No.	63823	<i>PCW Revision February 11, 2021</i>		
Reg. Ent. Reference No.	RN100237502			
Media	Air			
Enf. Coordinator	Johnnie Wu			

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Number	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	2	10%
	Other written NOVs	3	6%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	2	40%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%
Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 56%

>> Repeat Violator (Subtotal 3)

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for two NOVs with same/similar violations, three NOVs with dissimilar violations, and two orders containing a denial of liability.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 56%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 56%

Screening Date	28-Mar-2023	Docket No.	2023-0434-AIR-E	PCW
Respondent	JGE Gas Solutions, LP	Policy Revision 5 (January 28, 2021)		
Case ID No.	63823	PCW Revision February 11, 2021		
Reg. Ent. Reference No.	RN100237502			
Media	Air			
Enf. Coordinator	Johnnie Wu			
Violation Number	1			
Rule Cite(s)	30 Tex. Admin. Code §§ 101.20(2), 113.1090, and 122.143(4), 40 Code of Federal Regulations ("CFR") § 63.6640(b), Federal Operating Permit ("FOP") No. O3097, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") Nos. 1.A and 1.E, and Tex. Health & Safety Code § 382.085(b)			
Violation Description	Failed to report each instance of deviation from the emission and operating limitations. Specifically, the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the July 1, 2021 through December 31, 2021 reporting period did not include the deviation for failing to demonstrate continuous compliance with the catalyst inlet temperature limit from August 30, 2021 to September 1, 2021 for the Waukesha L7042G Engine C-28.			
Base Penalty				\$25,000
>> Environmental, Property and Human Health Matrix				
OR	Harm			
	Release	Major	Moderate	Minor
	Actual			
	Potential			
				Percent 0.0%
>> Programmatic Matrix				
	Falsification	Major	Moderate	Minor
				x
				Percent 1.0%
Matrix Notes	Less than 30% of the rule requirements were not met.			
Adjustment				\$24,750
				\$250
Violation Events				
Number of Violation Events		1	421	Number of violation days
	daily			
	weekly			
	monthly			
	quarterly			
	semiannual			
	annual			
	single event		x	
				Violation Base Penalty \$250
One single event is recommended.				
Good Faith Efforts to Comply		0.0%	Reduction \$0	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer				
	Extraordinary			
	Ordinary			
	N/A	x		
Notes	The Respondent does not meet the good faith criteria for this violation.			
Violation Subtotal				\$250
Economic Benefit (EB) for this violation Statutory Limit Test				
Estimated EB Amount		\$48	Violation Final Penalty Total \$390	
This violation Final Assessed Penalty (adjusted for limits)				\$390

Economic Benefit Worksheet

Respondent JGE Gas Solutions, LP
Case ID No. 63823
Reg. Ent. Reference No. RN100237502
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$250	31-Jan-2022	23-Nov-2025	3.81	\$48	n/a	\$48

Notes for DELAYED costs

Estimated cost to submit a revised 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the July 1, 2021 through December 31, 2021 reporting period to report the deviation for failing to demonstrate continuous compliance with the catalyst inlet temperature limit from August 30, 2021 to September 1, 2021 for the Waukesha L7042G Engine C-28. The Date Required is the date the deviation should have been reported and the Final Date is the estimated date of compliance.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$250

TOTAL

\$48

Screening Date 28-Mar-2023 Respondent JGE Gas Solutions, LP Case ID No. 63823 Reg. Ent. Reference No. RN100237502 Media Air Enf. Coordinator Johnnie Wu	Docket No. 2023-0434-AIR-E	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	2	
Rule Cite(s)	30 Tex. Admin. Code §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6650(b)(2)(4), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and Tex. Health & Safety Code § 382.085(b)	
Violation Description	Failed to postmark or submit the semiannual compliance report no later than July 31 or January 31 following the end of the semiannual reporting period. Specifically, the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the January 1, 2021 through June 30, 2021 reporting period was not postmarked or submitted to the TCEQ by July 31, 2021.	

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR		Harm			
	Release	Major	Moderate	Minor	
	Actual				Percent 0.0%
	Potential				

>> Programmatic Matrix

	Falsification	Major	Moderate	Minor	
		x			Percent 20.0%

Matrix Notes	100% of the rule requirements were not met.
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Adjustment \$20,000

\$5,000

Violation Events

Number of Violation Events	1	605	Number of violation days
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	daily		Violation Base Penalty \$5,000
	weekly		
	monthly		
	quarterly		
	semiannual		
	annual		
	single event	x	

One single event is recommended.

Good Faith Efforts to Comply

	0.0%	
		Reduction \$0

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

Notes	The Respondent does not meet the good faith criteria for this violation.
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Violation Subtotal \$5,000

Economic Benefit (EB) for this violation

	Statutory Limit Test
Estimated EB Amount \$54	Violation Final Penalty Total \$7,800
This violation Final Assessed Penalty (adjusted for limits) \$7,800	

Economic Benefit Worksheet

Respondent JGE Gas Solutions, LP
Case ID No. 63823
Reg. Ent. Reference No. RN100237502
Media Air
Violation No. 2

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$250	31-Jul-2021	23-Nov-2025	4.32	\$54	n/a	\$54

Notes for DELAYED costs

Estimated cost to submit the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the January 1, 2021 through June 30, 2021 reporting period. The Dates Required is the date the report was due and the Final Date is the estimated date of compliance.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$250

TOTAL

\$54

Screening Date 28-Mar-2023 Respondent JGE Gas Solutions, LP Case ID No. 63823 Reg. Ent. Reference No. RN100237502 Media Air Enf. Coordinator Johnnie Wu	Docket No. 2023-0434-AIR-E	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	3	
Rule Cite(s)		30 Tex. Admin. Code §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6640(a), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and Tex. Health & Safety Code § 382.085(b)
Violation Description		Failed to maintain the catalyst inlet temperature greater than or equal to 750 degrees Fahrenheit ("°F"). Specifically, the Respondent did not maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L7042G Engine C-28 when the catalyst inlet temperature was less than 750°F for a total of 21 hours and 45 minutes on seven days from March 7, 2022 to May 25, 2022.

Base Penalty	\$25,000
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> > Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual			x	
	Potential				

30.0%

> > Programmatic Matrix

Matrix Notes	Falsification	Major	Moderate	Minor	Percent

0.0%

	Adjustment
	\$17,500

	\$7,500
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Violation Events

Number of Violation Events	1		7	Number of violation days
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daily		Violation Base Penalty
weekly		
monthly		
quarterly	x	
semiannual		
annual		
single event		

\$7,500

One quarterly event is recommended for the instances of non-compliance that occurred from March 7, 2022 to May 25, 2022.	
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Good Faith Efforts to Comply

	0.0 %	
		Reduction
		\$0

	Before NOE/NOV	NOE/NOV to EDPRP/Settlement Offer	
Extraordinary			
Ordinary			
N/A	x		
Notes	The Respondent does not meet the good faith criteria for this violation.		

Violation Subtotal	\$7,500
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Economic Benefit (EB) for this violation

	\$1,859	
Estimated EB Amount		Statutory Limit Test
		Violation Final Penalty Total
		\$11,700

This violation Final Assessed Penalty (adjusted for limits)	\$11,700
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Economic Benefit Worksheet

Respondent JGE Gas Solutions, LP
Case ID No. 63823
Reg. Ent. Reference No. RN100237502
Media Air
Violation No. 3

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$10,000	7-Mar-2022	23-Nov-2025	3.72	\$1,859	n/a	\$1,859

Notes for DELAYED costs

Estimated cost to maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L7042G Engine C-28. The Date Required is the initial date of non-compliance and the Final Date is the estimated date of compliance.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$10,000

TOTAL

\$1,859

Screening Date 28-Mar-2023 Respondent JGE Gas Solutions, LP Case ID No. 63823 Reg. Ent. Reference No. RN100237502 Media Air Enf. Coordinator Johnnie Wu	Docket No. 2023-0434-AIR-E	PCW <i>Policy Revision 5 (January 28, 2021)</i> <i>PCW Revision February 11, 2021</i>
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Violation Number	4	Rule Cite(s)	
		30 Tex. Admin. Code §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6640(a), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and Tex. Health & Safety Code § 382.085(b)	
Violation Description		Failed to maintain the catalyst inlet temperature greater than or equal to 750°F. Specifically, the Respondent did not maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L5790G Engine C-04 when the catalyst inlet temperature was less than 750°F for a total of 61 hours and 15 minutes on six days from March 14, 2022 to March 22, 2022.	

Base Penalty	\$25,000
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>> Environmental, Property and Human Health Matrix

OR	Release	Harm			Percent
		Major	Moderate	Minor	
	Actual	[]	[]	x	
	Potential	[]	[]	[]	

>> Programmatic Matrix

Falsification	Major	Moderate	Minor	Percent
[]	[]	[]	[]	
Matrix Notes	Human health or the environment has been exposed to insignificant amounts of pollutants that do not exceed levels that are protective of human health or environmental receptors as a result of the violation.			

Adjustment	\$17,500
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Adjustment	\$7,500
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Violation Events

Number of Violation Events	1	6	Number of violation days
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daily	[]	Violation Base Penalty	\$7,500
weekly	[]		
monthly	[]		
quarterly	x		
semiannual	[]		
annual	[]		
single event	[]		

One quarterly event is recommended for the instances of non-compliance that occurred from March 14, 2022 to March 22, 2022.	
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Good Faith Efforts to Comply

0.0 %		Reduction	\$0
	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
Extraordinary	[]		
Ordinary	[]		
N/A	x		
Notes	The Respondent does not meet the good faith criteria for this violation.		

Violation Subtotal	\$7,500
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Economic Benefit (EB) for this violation

Statutory Limit Test	
Estimated EB Amount	\$1,849
Violation Final Penalty Total	\$11,700
This violation Final Assessed Penalty (adjusted for limits)	
\$11,700	

Economic Benefit Worksheet

Respondent JGE Gas Solutions, LP
Case ID No. 63823
Reg. Ent. Reference No. RN100237502
Media Air
Violation No. 4

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Costs Saved	EB Amount
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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)	\$10,000	14-Mar-2022	23-Nov-2025	3.70	\$1,849	n/a	\$1,849

Notes for DELAYED costs

Estimated cost to maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L5790G Engine C-04. The Date Required is the date of the first non-compliance and the Final Date is the estimated date of compliance.

Avoided Costs

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

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

Notes for AVOIDED costs

Approx. Cost of Compliance

\$10,000

TOTAL

\$1,849



Compliance History Report

Compliance History Report for CN604797068, RN100237502, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator: CN604797068, JGE Gas Solutions, LP **Classification:** SATISFACTORY **Rating:** 12.85

Regulated Entity: RN100237502, Longview Gas Plant **Classification:** SATISFACTORY **Rating:** 12.85

Complexity Points: 19 **Repeat Violator:** NO

CH Group: 03 - Oil and Gas Extraction

Location: 3407 West Camp Switch Road, Longview, Gregg County, Texas 75604-9124

TCEQ Region: REGION 05 - TYLER

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER GJ0003W

AIR NEW SOURCE PERMITS PERMIT 19994

AIR NEW SOURCE PERMITS ACCOUNT NUMBER GJ0003W

AIR NEW SOURCE PERMITS REGISTRATION 14352

AIR NEW SOURCE PERMITS REGISTRATION 26085

AIR NEW SOURCE PERMITS REGISTRATION 47116

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX835

AIR NEW SOURCE PERMITS REGISTRATION 159255

WASTEWATER PERMIT WQ0005349000

AIR EMISSIONS INVENTORY ACCOUNT NUMBER GJ0003W

AIR OPERATING PERMITS PERMIT 3097

AIR NEW SOURCE PERMITS PERMIT 23110

AIR NEW SOURCE PERMITS AFS NUM 4818300001

AIR NEW SOURCE PERMITS REGISTRATION 15368

AIR NEW SOURCE PERMITS REGISTRATION 44414

AIR NEW SOURCE PERMITS REGISTRATION 54008

AIR NEW SOURCE PERMITS REGISTRATION 135206

AIR NEW SOURCE PERMITS REGISTRATION 178936

WASTEWATER EPA ID TX0000485

Compliance History Period: September 01, 2019 to August 31, 2024 **Rating Year:** 2024 **Rating Date:** 09/01/2024

Date Compliance History Report Prepared: March 11, 2025

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: March 11, 2020 to March 11, 2025

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

Name: Johnnie Wu

Phone: (512) 239-2524

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: 06/02/2020 ADMINORDER 2019-1617-AIR-E (1660 Order-Agreed Order With Denial)
- Classification: Moderate
- Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
- 30 TAC Chapter 113, SubChapter C 113.1090
- 30 TAC Chapter 122, SubChapter B 122.143(4)
- 40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6640(a)
- 5C THSC Chapter 382 382.085(b)
- Rqmt Prov: FOP O-3097, STC 1A OP
- FOP O-3097, STC 1F OP
- Description: Failure to maintain engine catalyst temperature within operating limitations.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 113, SubChapter C 113.1090
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT ZZZZ 63.6650(b)(3)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-3097, STC 1A OP
FOP O-3097, STC 1F OP

Description: Failed to submit a semi-annual 40 CFR Part 63 Subpart ZZZZ compliance report, in violation of 30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6650(b)(3), FOP No. O3097, GTC and STC Nos. 1.A and 1.F, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the semi-annual 40 CFR Part 63 Subpart ZZZZ compliance report for the July 1, 2019 through December 31, 2019 reporting period was due by January 31, 2020, but was not submitted until January 6, 2021.

Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter A 106.8(c)(2)(B)
30 TAC Chapter 106, SubChapter W 106.512(2)(C)(i)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O3097 OP
FOP O-3097, STC 1A OP

Description: Failed to create and maintain records for a period of at least two years and make available upon request to the Commission and any local air pollution control agency having jurisdiction, in violation of 30 TEX. ADMIN. CODE §§ 106.8(c)(2)(B), 106.512(2)(C)(i), and 122.143(4), Federal Operating Permit ("FOP") No. O3097, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, on October 22, 2020, TCEQ staff

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT IIII 60.4214(b)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O3097 OP
FOP O-3097, STC 1A OP

Description: Failed to maintain records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1) and 122.143(4), 40 CFR § 60.4214(b), FOP No. O3097, GTC and STC No. 1.A, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain the records for the time of operation and the reason the engine was operating during that time for the Standby Diesel Generator.

Classification: Moderate

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-3097, STC 3(A)(iv)(3) OP
FOP O-3097, STC 1A OP

Description: Failed to record at least 98 percent ("%") of the required daily flare observations in the flare operation log, in violation of 30 TEX. ADMIN. CODE §§ 111.111(a)(4)(A)(ii) and 122.143(4), FOP No. O3097, GTC and STC Nos. 1.A and 3.A.(iv)(3), and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent conducted daily flare observations during the operational shift walk throughs and any time operators or contractors were out at the Plant, but the Respondent did not record that the

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(f)(2)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O3097 OP
FOP O-3097, STC 11 OP
Permit No. 23110, SC 2 PERMIT

Description: Failed to monitor the flare with a flame present at all times using a thermocouple or any other equivalent device to detect the presence of a flame, in violation of 30 TEX. ADMIN. CODE §§ 101.20(1) and (3), 116.115(c), and 122.143(4), 40 CFR § 60.18(f)(2), New Source Review Permit Nos. 23110 and PSD-TX-835, SC No. 2, FOP No. O3097, GTC and STC No. 11, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the thermocouple for the Normal Operation Flare became inoperable on June 30, 2020

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: FOP O-3097, General Terms and Conditions OP

Description: Failed to report all instances of deviations, in violation of 30 TEX. ADMIN. CODE §§ 122.143(4) and 122.145(2)(A), FOP No. O3097, GTC, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the deviation report for the December 16, 2019 through June 15, 2020 reporting period did not include the deviations for failing to maintain the records for the engine maintenance, failing to maintain the records for the operation of the Standby Diesel Generator, failing to record at least 98% of the

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	April 20, 2020	(1776441)
Item 2	July 27, 2020	(1776461)
Item 3	August 04, 2020	(1663328)
Item 4	September 21, 2020	(1677234)
Item 5	October 21, 2020	(1776471)
Item 6	January 13, 2021	(1692463)
Item 7	January 19, 2021	(1776487)
Item 8	April 29, 2021	(1776442)
Item 9	July 27, 2021	(1776457)
Item 10	October 18, 2021	(1776472)
Item 11	January 25, 2022	(1790545)
Item 12	April 26, 2022	(1813280)
Item 13	July 27, 2022	(1834983)
Item 14	October 26, 2022	(1856119)
Item 15	November 21, 2022	(1854976)
Item 16	January 30, 2023	(1875241)
Item 17	April 27, 2023	(1898438)
Item 18	July 21, 2023	(1925980)
Item 19	October 27, 2023	(1939078)
Item 20	November 20, 2023	(1951624)
Item 21	July 19, 2024	(2011101)
Item 22	August 20, 2024	(2016705)
Item 23	September 30, 2024	(2023723)
Item 24	October 28, 2024	(2029845)
Item 25	November 19, 2024	(2023290)
Item 26	November 20, 2024	(2036167)
Item 27	December 23, 2024	(2042278)
Item 28	January 21, 2025	(2049105)

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.

1	Date: 03/31/2024 (1990139)		
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
2	Date: 04/30/2024 (1996595)		
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		

3	Date: 05/31/2024 (2003547)		
	Self Report? YES	Classification: Moderate	
	Citation: 2D TWC Chapter 26, SubChapter A 26.121(a) 30 TAC Chapter 305, SubChapter F 305.125(1)		
	Description: Failure to meet the limit for one or more permit parameter		
4	Date: 07/08/2024 (1996194)		
	Self Report? NO	Classification: Moderate	
	Citation: 30 TAC Chapter 101, SubChapter A 101.10(b)(2) 30 TAC Chapter 101, SubChapter A 101.10(e) 5C THSC Chapter 382 382.085(b)		
	Description: Failure to submit a 2023 Emissions Inventory. CATEGORY B18 (g)(3).		
5	Date: 08/30/2024 (2008384)		
	Self Report? NO	Classification: Moderate	
	Citation: 30 TAC Chapter 113, SubChapter C 113.1090 30 TAC Chapter 122, SubChapter B 122.143(4) 3097 OP 5C THSC Chapter 382 382.085(b)		
	Description: Failure to monitor and record engine catalyst temperature.		

F. Environmental audits:
N/A

G. Type of environmental management systems (EMSs):
N/A

H. Voluntary on-site compliance assessment dates:
N/A

I. Participation in a voluntary pollution reduction program:
N/A

J. Early compliance:
N/A

Sites Outside of Texas:
N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
JGE GAS SOLUTIONS, LP
RN100237502

§ BEFORE THE
§
§ TEXAS COMMISSION ON
§
§ ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2023-0434-AIR-E

I. JURISDICTION AND STIPULATIONS

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

1. The Respondent owns and operates a natural gas plant located at 3407 West Camp Switch Road in Longview, Gregg 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 \$31,590 is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent paid \$25,272 of the penalty and \$6,318 is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Order. The deferred amount shall be waived only upon full compliance with all the terms and conditions contained in this Order. If the Respondent fails to timely and satisfactorily comply with any of the terms or requirements contained in this Order, the Executive Director may demand payment of all or part of the deferred penalty amount.
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.

II. ALLEGATIONS

During a record review for the Plant conducted on March 15, 2023, an investigator documented that the Respondent:

1. Failed to report each instance of deviation from the emission and operating limitations, in violation of 30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 63.6640(b), Federal Operating Permit ("FOP") No. O3097, General Terms and Conditions ("GTC") and Special Terms and Conditions ("STC") Nos. 1.A and 1.E, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the July 1, 2021 through December 31, 2021 reporting period did not include the deviation for failing to demonstrate continuous compliance with the catalyst inlet temperature limit from August 30, 2021 to September 1, 2021 for the Waukesha L7042G Engine C-28.
2. Failed to postmark or submit the semiannual compliance report no later than July 31 or January 31 following the end of the semiannual reporting period, in violation of 30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6650(b)(2)(4), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the January 1, 2021 through June 30, 2021 reporting period was not postmarked or submitted to the TCEQ by July 31, 2021.
3. Failed to maintain the catalyst inlet temperature greater than or equal to 750 degrees Fahrenheit ("°F"), in violation of 30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6640(a), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L7042G Engine C-28 when the catalyst inlet temperature was less than 750°F for a total of 21 hours and 45 minutes on seven days from March 7, 2022 to May 25, 2022.
4. Failed to maintain the catalyst inlet temperature greater than or equal to 750°F, in violation of 30 TEX. ADMIN. CODE §§ 101.20(2), 113.1090, and 122.143(4), 40 CFR § 63.6640(a), FOP No. O3097, GTC and STC Nos. 1.A and 1.E, and TEX. HEALTH & SAFETY CODE § 382.085(b). Specifically, the Respondent did not maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L5790G Engine C-04 when the catalyst inlet

temperature was less than 750°F for a total of 61 hours and 15 minutes on six days from March 14, 2022 to March 22, 2022.

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: JGE Gas Solutions, LP, Docket No. 2023-0434-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 undertake the following technical requirements at the Plant:
 - a. Within 30 days after the effective date of the Order:
 - i. Submit a revised 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the July 1, 2021 through December 31, 2021 reporting period to report the deviation for failing to demonstrate continuous compliance with the catalyst inlet temperature limit from August 30, 2021 to September 1, 2021 for the Waukesha L7042G Engine C-28;
 - ii. Submit the 40 CFR Part 63 Subpart ZZZZ semiannual compliance report for the January 1, 2021 through June 30, 2021 reporting period;
 - iii. Maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L7042G Engine C-28; and
 - iv. Maintain the catalyst inlet temperature greater than or equal to 750°F and less than or equal to 1,250°F based on a four-hour rolling average for the Waukesha L5790G Engine C-04.
 - b. Within 45 days after the effective date of this Order, submit written certification, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision No. 2.a. The certification shall be signed by the Respondent and shall include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certification shall be submitted to:

Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Air Section Manager
Tyler Regional Office
Texas Commission on Environmental Quality
2916 Teague Drive
Tyler, Texas 75701-3734

3. All relief not expressly granted in this Order is denied.
4. The duties and provisions imposed by this Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of this Order to personnel who maintain day-to-day control over the Plant operations referenced in this Order.
5. The Executive Director may grant an extension of any deadline in this Order or in any plan, report, or other document submitted pursuant to this Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director. Extension requests shall be sent to the Enforcement Division at the address listed above.
6. This Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
7. This Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate

reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms: electronic transmission, owner, person, writing, and written, shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

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

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Date

Krista Mello-Jurach

08/27/2025

For the Executive Director

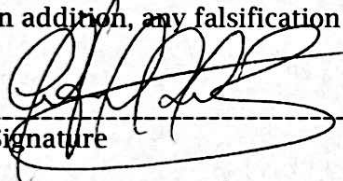
Date

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

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

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

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



Signature

6-10-2025

Date

CRISTIANO M BERALDO

Name (Printed or typed)
Authorized Representative of
JGE Gas Solutions, LP

CEO

Title

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

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