

**From:** [Randy Ammons](#)  
**To:** [Ramiro Garcia](#)  
**Cc:** [Susan Johnson](#); [Tracy Miller](#); [Jayme Sadlier](#)  
**Subject:** FW: Enforcement Discretion Request  
**Date:** Friday, March 20, 2020 3:50:36 PM

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Below is the email response I sent to Mr. Hancock today.

Thanks

Randy

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**From:** Randy Ammons  
**Sent:** Friday, March 20, 2020 2:21 PM  
**To:** Jansen Hancock <[REDACTED]>  
**Subject:** RE: Enforcement Discretion Request

Good afternoon Mr. Hancock,

The TCEQ has received your request for enforcement discretion on all LDAR activities for the month of April. At this time, your request is denied, however, we are willing to reassess your request at end of April. If necessary, please re-submit your request to [OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov) and [Ramiro.garcia@tceq.texas.gov](mailto:Ramiro.garcia@tceq.texas.gov) at the end of next month and please be as specific as possible as to what conditions of the permit that enforcement discretion is being requested.

Please remember that while the TCEQ may give enforcement discretion for state rules, the EPA may still take action if violations of federal rules are documented.

The TCEQ is committed to working with you as we respond to the COVID-19 pandemic. If you have any questions or new information, please feel free to contact us at any time.

Regards,

Randy J. Ammons, Area Director  
North Central and West Texas Area

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**From:** Jansen Hancock <[REDACTED]>  
**Sent:** Thursday, March 19, 2020 6:39 PM  
**To:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Cc:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Randy Ammons <[randy.ammons@tceq.texas.gov](mailto:randy.ammons@tceq.texas.gov)>; David Durst <[david.durst@tceq.texas.gov](mailto:david.durst@tceq.texas.gov)>; Tracy Miller <[tracy.miller@tceq.texas.gov](mailto:tracy.miller@tceq.texas.gov)>; Susan Johnson <[susan.johnson@tceq.texas.gov](mailto:susan.johnson@tceq.texas.gov)>; Jayme Sadlier <[jayme.sadlier@tceq.texas.gov](mailto:jayme.sadlier@tceq.texas.gov)>; Monica Aplin <[Monica.Aplin@tceq.texas.gov](mailto:Monica.Aplin@tceq.texas.gov)>; Jacqueline Cullather <[Jacqueline.Cullather@tceq.texas.gov](mailto:Jacqueline.Cullather@tceq.texas.gov)>  
**Subject:** Re: Enforcement Discretion Request

Great. Thank you, Ramiro. I do have an update to this request. I was able to move our scheduled LDAR testing up to tomorrow, March, 20th. The panhandle doesn't have a lot of confirmed cases yet, so we feel comfortable having this completed tomorrow. This means we are only requesting enforcement discretion on all LDAR activities for the month of April. Thanks again for your consideration.

Jansen Hancock

Sent from my iPhone

On Mar 19, 2020, at 6:15 PM, Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)> wrote:

**EXTERNAL-EMAIL**

Good afternoon Mr. Hancock

This email confirms receipt of your correspondence. We are reviewing your request and expect to have a reply to you soon.

Sincerely,

Ramiro Garcia, Jr.  
Deputy  
Office of Compliance & Enforcement  
TCEQ

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**From:** Jansen Hancock <[REDACTED]>  
**Sent:** Thursday, March 19, 2020 11:00 AM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** Enforcement Discretion Request

Good morning,  
Pampa Fuels (Permit Number 105050) is requesting enforcement discretion on all LDAR testing for the months of March and April, specifically Special Conditions 18, 19, & 20 of the attached permit. Pampa Fuels is a small facility, and all LDAR testing is conducted through third party contractors. In an effort to limit exposure to the Coronavirus, Pampa Fuels has limited all employees, visitors and contractors to essential personnel only. Pampa Fuels is a small facility (Not Title V) with an excellent LDAR history. LDAR results for the previous two years is shown below. Thanks for your consideration.

<image002.png>

<image003.png>

<image004.png>

<image005.png>

Best Regards,

*Jansen Hancock*

Quality Control/Environmental Manager

Office: 806.370.7652

Cell: 806.663.2262

<image006.png>

8201 FM 2300

PO Box 941

Pampa, TX 79066

**CAUTION:** This email originated from outside of G2X Energy, Inc. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**From:** [Jansen Hancock](#)  
**To:** [OCE](#); [Ramiro Garcia](#)  
**Subject:** Enforcement Discretion Request  
**Date:** Thursday, March 19, 2020 11:00:05 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[image005.png](#)  
[image012.png](#)  
[image013.png](#)  
[PAMPA FUEL Permit105050 ID604202-1 Project278801 Conditions.pdf](#)

Good morning,

Pampa Fuels (Permit Number 105050) is requesting enforcement discretion on all LDAR testing for the months of March and April, specifically Special Conditions 18, 19, & 20 of the attached permit. Pampa Fuels is a small facility, and all LDAR testing is conducted through third party contractors. In an effort to limit exposure to the Coronavirus, Pampa Fuels has limited all employees, visitors and contractors to essential personnel only. Pampa Fuels is a small facility (Not Title V) with an excellent LDAR history. LDAR results for the previous two years is shown below. Thanks for your consideration.

Period	Year	Valve Leaks	Valves Not Repaired in 15 Days	Pump Leaks	Pumps Not Repaired in 15 Days	Compressor Leaks	Compressors Not Repaired in 15 Days	Relief Valve Leaks	Relief Valves Not Repaired in 15 Days	Connector Leaks	Connectors Not Repaired in 15 Days
July	2019	0	0	0	0	0	0	0	0	0	0
August	2019	0	0	0	0	0	0	0	0	0	0
September	2019	0	0	0	0	0	0	0	0	1	0
October	2019	0	0	0	0	0	0	0	0	0	0
November	2019	0	0	0	0	0	0	0	0	0	0
December	2019	4	0	0	0	0	0	0	0	0	0
<b>Totals</b>		<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>Process area shutdowns occurring during reporting period:</b>											
Area Shutdown		Start Date		End Date							
Pampa Fuels, LLC		7/23/2019		7/26/2019							
Pampa Fuels, LLC		8/12/2019		8/14/2019							
Pampa Fuels, LLC		8/17/2019		8/17/2019							
<b>Revisions To Master Equipment Summary:</b>											
Component Type		Added		Removed							
Valves		0		0							
Pumps		0		0							
Pressure Relief Valves		0		0							
Connectors		0		0							
Compressors		0		0							
<b>Delay of Repair Items</b>											
Tag #	Location	Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Reason for Delay	Date Placed on SD	Exp. Rep Date			
None during this time period.											
Previous DDR Items: None											

Period	Year	Valve Leaks	Valves Not Repaired in 15 Days	Pump Leaks	Pumps Not Repaired in 15 Days	Compressor Leaks	Compressors Not Repaired in 15 Days	Relief Valve Leaks	Relief Valves Not Repaired in 15 Days	Connector Leaks	Connectors Not Repaired in 15 Days
January	2019	0	0	0	0	0	0	0	0	0	0
February	2019	0	0	0	0	0	0	0	0	0	0
March	2019	2	0	0	0	0	0	0	0	0	0
April	2019	0	0	0	0	0	0	0	0	0	0
May	2019	0	0	0	0	0	0	0	0	0	0
June	2019	1	0	0	0	0	0	0	0	0	0
<b>Totals</b>		<b>3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Process area shutdowns occurring during reporting period:

Area Shutdown	Start Date	End Date
Pampa Fuels, LLC	5/1/2019	1/26/2019
Pampa Fuels, LLC	2/6/2019	2/6/2019
Pampa Fuels, LLC	2/14/2019	3/1/2019
Pampa Fuels, LLC	3/1/2019	3/11/2019
Pampa Fuels, LLC	3/13/2019	3/14/2019
Pampa Fuels, LLC	4/1/2019	4/1/2019
Pampa Fuels, LLC	4/16/2019	4/19/2019
Pampa Fuels, LLC	5/7/2019	5/7/2019
Pampa Fuels, LLC	5/26/2019	5/26/19
Pampa Fuels, LLC	5/31/2019	5/31/2019

Revisions To Master Equipment Summary:

Component Type	Added	Removed
Valves	9	0
Pumps	0	0
Pressure Relief Valves	0	0
Connectors	29	0
Compressors	0	0

Delay of Repair Items

Tag #	Location	Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Reason for Delay	Date Placed on SD	Exp. Rep Date
None during this time period.								

Previous DOR Items: None

Period	Year	Valve Leaks	Valves Not Repaired in 15 Days	Pump Leaks	Pumps Not Repaired in 15 Days	Compressor Leaks	Compressors Not Repaired in 15 Days	Relief Valve Leaks	Relief Valves Not Repaired in 15 Days	Connector Leaks	Connectors Not Repaired in 15 Days
July	2018	0	0	0	0	0	0	0	0	0	0
August	2018	0	0	0	0	0	0	0	0	0	0
September	2018	1	0	0	0	0	0	0	0	2	0
October	2018	0	0	0	0	0	0	0	0	0	0
November	2018	0	0	0	0	0	0	0	0	0	0
December	2018	3	0	0	0	0	0	0	0	0	0
<b>Totals</b>		<b>4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>

Process area shutdowns occurring during reporting period:

Area Shutdown	Start Date	End Date
Plant Wide	8/22/2018	8/24/2018
Plant Wide	8/25/2018	8/28/2018
Plant Wide	9/27/2018	11/2/2018
Plant Wide	11/25/2018	11/25/2018
Plant Wide	12/15/2018	12/16/2018
Plant Wide	12/26/2018	-

Revisions To Master Equipment Summary:

Component Type	Added	Removed
Valves	0	1
Pumps	0	0
Pressure Relief Valves	0	0
Connectors	0	5
Compressors	0	0

Delay of Repair Items

Tag #	Location	Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Reason for Delay	Date Placed on SD	Exp. Rep Date
None during this time period.								

Previous DOR Items: None

Period	Year	Valve Leaks	Valves Not Repaired in 15 Days	Pump Leaks	Pumps Not Repaired in 15 Days	Compressor Leaks	Compressors Not Repaired in 15 Days	Relief Valve Leaks	Relief Valves Not Repaired in 15 Days	Connector Leaks	Connectors Not Repaired in 15 Days
January	2018	0	0	0	0	0	0	0	0	0	0
February	2018	0	0	0	0	0	0	0	0	0	0
March	2018	0	0	0	0	0	0	0	0	0	0
April	2018	0	0	0	0	0	0	0	0	0	0
May	2018	0	0	0	0	0	0	0	0	0	0
June	2018	0	0	0	0	0	0	0	0	0	0
<b>Totals</b>		0	0	0	0	0	0	0	0	0	0
<b>Process area shutdowns occurring during reporting period:</b>											
Area Shutdown			Start Date		End Date						
Pampa Fuels, LLC			2/6/2018		2/8/2018						
Pampa Fuels, LLC			3/4/2018		3/5/2018						
Pampa Fuels, LLC			3/11/2018		3/15/2018						
Pampa Fuels, LLC			4/13/2018		4/14/2018						
Pampa Fuels, LLC			5/5/2018		5/6/2018						
Pampa Fuels, LLC			5/24/2018		5/25/2018						
Pampa Fuels, LLC			6/7/2018		6/7/2018						
Pampa Fuels, LLC			6/20/2018		6/20/2018						
Pampa Fuels, LLC			6/22/2018		6/22/2018						
<b>Revisions To Master Equipment Summary:</b>											
		Component Type	Added	Removed							
		Valves:	0	0							
		Pumps:	0	0							
		Pressure Relief Valves:	0	0							
		Connectors:	0	0							
		Compressors:	0	0							
<b>Delay of Repair Items</b>											
Tag #	Location	Equip. Type	Date Leak Detected	Date Repaired	Currently on SD?	Reason for Delay	Date Placed on SD	Exp. Rep Date			
None during this time period.											
<b>Previous DOR Items:</b>											
39700-000	G-03 E Side of V-531	Valve	6/22/2017	3/29/2018	No	USD	7/3/2017	4/30/2018			

Best Regards,  
*Jansen Hancock*  
Quality Control/Environmental Manager

Office: 806.370.7652  
Cell: 806.663.2262  
**PAMPAFUELS**  
8201 FM 2300  
PO Box 941  
Pampa, TX 79066

## Special Conditions

Permit Number 105050

### Emission Limitations

1. This permit authorizes operation of a methanol production facility located at 8201 FM 2300, Pampa, Gray County, Texas.

This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the special conditions.

2. Non-fugitive emissions from relief valves, safety valves, or rupture discs of gases containing volatile organic compounds (VOC) at a concentration of greater than 1 percent are not authorized by this permit unless authorized on the MAERT. Any releases directly to atmosphere from relief valves, safety valves, or rupture discs of gases containing VOC at a concentration greater than 1 weight percent are not consistent with good practice for minimizing emissions. **(03/17)**

### Federal Applicability

3. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60):
  - A. Subpart A, General Provisions.
  - B. Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.
  - C. Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984.
  - D. Subpart VVa, Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006.
  - E. Subpart NNN, Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations.
  - F. Subpart RRR, Standards of Performance for Volatile Organic Compound (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes.
4. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63:
  - A. Subpart A, General Provisions.
  - B. Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.
5. If any condition of this permit is more stringent than the applicable regulations in Special Condition Nos. 3 and 4, then for the purposes of complying with this permit, the permit shall govern and be the standard by which compliance shall be demonstrated.

### Emission Standards and Operational Specifications

6. Steam Methane Reformer (Emission Point Number (EPN) F-501) shall be fired with natural gas or fuel gas containing no more than 0.20 grains of total sulfur per 100 dry standard cubic feet (dscf).
7. Package Boiler (EPN B-601) shall be fired with natural gas containing no more than 0.20 grains of total sulfur per 100 dscf.
8. The natural gas shall be sampled every 6 months to determine total sulfur and net heating value. Test results from the fuel supplier may be used to satisfy this requirement.
9. The permit holder shall install and operate totalizing fuel flow meters to measure the gas fuel usage for the Steam Methane Reformer and the package boiler and fuel usage for each shall be recorded monthly. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications or at least annually, whichever is more frequent, and shall be accurate to within 5 percent.

Quality assured (or valid) data must be generated when the Steam Methane Reformer or boiler is operating. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the Steam Methane Reformer or boiler operated over the previous rolling 12 month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded.

10. NO<sub>x</sub> and CO emissions from the Steam Methane Reformer (EPN F-501) shall not exceed the following:
  - 0.035 lb NO<sub>x</sub>/MMBtu on an hourly average
  - 50 ppmvd CO corrected to 3 percent oxygen on an hourly average.
11. NO<sub>x</sub> and CO emissions from the Package Boiler (EPN B-601) shall not exceed the following:
  - 0.013 lb NO<sub>x</sub>/MMBtu on an hourly average
  - 50 ppmvd CO corrected to 3 percent oxygen on an hourly average.
12. The Firewater Pumps and Emergency Diesel Generators (EPNs FWP-1, FWP-2, FWP-3, and EGEN-1) are authorized to fire diesel fuel containing no more than 0.05 weight percent sulfur. The Firewater Pumps are each limited to a maximum of 26 non-emergency hours of operation annually. The Emergency Diesel Generator is limited to a maximum of 50 non-emergency hours of operation annually.
13. Accumulators V-304A and V-304B service is limited to storing crude methanol. Tanks T-314A, T-314B, and T-324 are limited to storing refined or product methanol. Accumulators V-304A and V-304B shall be vented to the flare (EPN F-305) for control of emissions. Tanks T-314A, T-314B, and T-324 shall be fitted with internal floating roofs for the control of emissions. **(7/14)**

Storage tanks are subject to the following requirements. The control requirements specified in paragraphs A-D of this condition shall not apply (1) where the VOC has an aggregate partial



pressure of less than 0.50 psia at the maximum feed temperature or 95°F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons.

- A. An internal floating deck or "roof" or equivalent control shall be installed in all tanks. The floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (1) a liquid-mounted seal, (2) two continuous seals mounted one above the other, or (3) a mechanical shoe seal.
  - B. An open-top tank containing a floating roof (external floating roof tank) which uses double seal or secondary seal technology shall be an approved control alternative to an internal floating roof tank provided the primary seal consists of either a mechanical shoe seal or a liquid-mounted seal and the secondary seal is rim-mounted. A weathershield is not approvable as a secondary seal unless specifically reviewed and determined to be vapor-tight.
  - C. For any tank equipped with a floating roof, the permit holder shall perform the visual inspections and seal gap measurements as specified in 40 CFR § 60.113b Testing and Procedures (as amended at 54 FR 32973, Aug. 11, 1989) to verify fitting and seal integrity. Records shall be maintained of the dates seals were inspected and seal gap measurements made, results of inspections and measurements made (including raw data), and actions taken to correct any deficiencies noted.
  - D. The floating roof design shall incorporate sufficient flotation to conform to the requirements of API Code 650 dated November 1, 1998 except that an internal floating cover need not be designed to meet rainfall support requirements and the materials of construction may be steel or other materials.
  - E. Uninsulated tank exterior surfaces exposed to the sun shall be white or aluminum. Storage tanks must be equipped with permanent submerged fill pipes.
  - F. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all storage tanks during the previous calendar month and the past consecutive 12 month period. The record shall include tank identification number, control method used, tank capacity in gallons, name of the material stored, VOC molecular weight, VOC monthly average temperature in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, VOC throughput for the previous month and year-to-date. Records of VOC monthly average temperature are not required to be kept for unheated tanks which receive liquids that are at or below ambient temperatures.
  - G. Emissions for tanks shall be calculated using the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks."
14. The following requirements apply to Tanks T-314A, T-314B, and T-324: **(7/14)**
- A. Tanks shall be constructed with a sloped bottom and a sump that can be emptied to less than 1 percent of its nominal volume.
  - B. Tanks shall be constructed or equipped with the capability for connection to a vapor recovery system that routes vapors from the vapor space under the landed roof to a control device.
  - C. The tank's outlet to the vapor recovery system shall be located at a height from the tank floor no less than 90 percent of the tank roof's leg height, or be of such a design that demonstrably allows the control of no less than 90 percent of the vapors generated under the IFR during tank re-filling































- (2) Conduct statistical test analysis at low, medium, and high levels (of the defined operating envelop) of the most significant operating parameter affecting NO<sub>x</sub> emissions. A minimum of 30 successive paired data points which are either 15-minute averages, 20-minute averages, or hourly averages must be collected at each tested level before a reliable statistical test can be performed.

Data collection must be continuous at all times except when calibration of the reference method must be conducted for the purpose of collecting data for RATA.

As per PS-16 Section 8.3 Statistical Tests for PEMS that are used for Continual Compliance in addition to the RA determination, evaluate the paired RA and PEMS data using the following statistical tests:

- (a) 8.3.1 Bias Test. From the RA data taken at the mid-level, determine if a bias exists between the RM and PEMS. Use the equations in section 12.3.1.
  - (b) 8.3.2 F-test. Perform a separate F-test for the RA paired data from each operating level to determine if the RM and PEMS variances differ by more than might be expected from chance. Use the equations in section 12.3.2.
  - (c) 8.3.3 Correlation Analysis. Perform a correlation analysis using the RA paired data from all operating levels combined to determine how well the RM and PEMS correlate. Use the equations in section 12.3.3. The correlation is waived if the process cannot be varied to produce a concentration change sufficient for a successful correlation test because of its technical design. In such cases, should a subsequent RATA identify a variation in the RM measured values by more than 30 percent, the waiver will not apply, and a correlation analysis test must be performed at the next RATA.
- (3) For NO<sub>x</sub> and for the purpose of conducting an F-test, if the standard deviation (SD) of the reference method is less than either 3 percent of the span or 5 ppm, use a reference method SD of the greater of 5 ppm or 3 percent of span.
  - (4) For diluent CO<sub>2</sub> or O<sub>2</sub> and for the purpose of conducting an F-test, if the SD of the reference method is less than 3 percent of span, use a reference method SD of 3 percent of span.
  - (5) For NO<sub>x</sub> and at any one tested level, if the mean value of the reference method is less than either 10 ppm or 5 percent of the standard, all statistical tests are waived for that emission parameter at that specific tested level.
  - (6) For either O<sub>2</sub> or CO<sub>2</sub> and at any one tested level, if the mean value of the reference method is less than 3 percent of span, all the statistical tests are waived for that diluent parameter at that specific tested level.
- C. The monitoring data shall be reduced to hourly average concentrations at least once every day, using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of NO<sub>x</sub> lb/MMBtu and CO ppmvd at 3% on an hourly average at least once every week as follows:
- The (hourly averaging period) average concentration from the PEMS shall be multiplied by the modelled exhaust gas flow rate determined by PS-16 standards to determine the hourly emission rate.
- D. All monitoring data and quality-assurance data shall be maintained by the permit holder.



- E. Any PEMS downtime shall be reported to the appropriate TCEQ Regional Director within three days of any downtime, and necessary corrective action shall be taken. Quality-assured (or valid) data must be generated when the Steam Methane Reformer (EPN F-501) is operating except during the performance of a sensor validation check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the Steam Methane Reformer (EPN F-501) operated over the previous rolling 12-month period. Owners or operators shall demonstrate that all missing data can be accounted for in accordance with the applicable missing data procedures of 40 CFR Part 60, Appendix-B; PS-16. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.
- F. The appropriate TCEQ Regional Office shall be notified at least 30 days prior to each annual RATA in order to provide them the opportunity to observe the testing.
- G. The owner or operator shall perform daily sensor validation as per PS-16 sections 6.1.8 and 9.2.
  - (1) 6.1.8 Sensor Evaluation System. Your PEMS must be designed to perform automatic or manual determination of defective sensors on at least a daily basis. This sensor evaluation system may consist of a sensor validation sub-model, a comparison of redundant sensors, a spot check of sensor input readings at a reference value, operation, or emission level, or other procedure that detects faulty or failed sensors. Some sensor evaluation systems generate substitute values (reconciled data) that are used when a sensor is perceived to have failed.
    - (a) You must obtain prior approval before using reconciled data.
  - (2) 9.2 Daily Sensor Evaluation Check. Your sensor evaluation system must check the integrity of each PEMS input at least daily.
  - (3) The owner or operator shall develop and implement plans that will ensure proper functioning of the monitoring systems, ensure proper accuracy and calibration of all operational parameters that affect emissions and serve as input to the predictive monitoring system, and ensure continuous operation within the certified operating range.
- H. In accordance with the procedure of Section 9.0, Appendix B of 40 CFR Part 60 PS-16, a RATA must be performed by the following section 9 QA/QC standards:

(1) ONGOING QUALITY ASSURANCE TESTS

Test	PEMS regulatory purpose	Acceptability	Frequency
Sensor Evaluation	All		Daily.
RAA	Compliance	3-test avg $\leq$ 10% of simultaneous analyzer or RM average	Each quarter except quarter when RATA performed.

RATA	All	Same as for RA in Sec. 13.1	Yearly in quarter when RAA not performed.
Bias Correction	All	If $d_{avg} \leq  cc $	Bias test passed (no correction factor needed).
PEMS Training	All	If $F_{critical} \geq F_r \geq 0.8$	Optional after initial and subsequent RATAs.

- (2) 9.2 Daily Sensor Evaluation Check. Your sensor evaluation system must check the integrity of each PEMS input at least daily.
- (3) 9.3 Quarterly Relative Accuracy Audits. In the first year of operation after the initial certification, perform a RAA consisting of at least three 30-minute portable analyzer or RM determinations each quarter a RATA is not performed. To conduct a RAA, follow the procedures in Section 8.2 for the relative accuracy test, except that only three sets of measurement data are required, and the statistical tests are not required. The average of the three or more portable analyzer or RM determinations must not exceed the limits given in Section 13.5. Report the data from all sets of measurement data. If a PEMS passes all quarterly RAAs in the first year and also passes the subsequent yearly RATA in the second year, you may elect to perform a single mid-year RAA in the second year in place of the quarterly RAAs. This option may be repeated, but only until the PEMS fails either a mid-year RAA or a yearly RATA. When such a failure occurs, you must resume quarterly RAAs in the quarter following the failure and continue conducting quarterly RAAs until the PEMS successfully passes both a year of quarterly RAAs and a subsequent RATA.
- (4) 9.4 Yearly Relative Accuracy Test. Perform a minimum 9-run RATA at the normal operating level on a yearly basis in the quarter that the RAA is not performed. The statistical tests in Section 8.3 are not required for the yearly RATA.
  - I. When an alternative fuel is fired in a unit, excluding times during planned startup and shutdown, PEMS must be re-certified in accordance with the certification procedures outlined for initial certification under Section B. Owners or operators may justify to the satisfaction of the TCEQ Executive Director that slight changes in fuel composition do not constitute an alternative fuel. No additional recertification procedures are required if the unit meets the current monitoring requirements when switching back to the normal fuel from an alternate fuel.
  - J. The system is required to provide valid emission predictions for at least 95 percent of the time that the unit being monitored is operated. The following rules for tuning without recertification shall be followed:
    - (1) The model did not change fundamentally.

(2) The model continues to operate within the initially certified operating ranges.

Otherwise, the system must be recertified. Any tuning must be documented, and the records must be made available during any future inspection.

- K. All owners or operators shall develop a quality-assurance plan or manual that insures continuous and reliable performance of the PEMS. As part of the plan, owners or operators shall recommend a frequency for calibrating each sensor whose readout serves as an input to the model. All sensors, at a minimum, shall be calibrated as often as recommended by the manufacturer.

### Recordkeeping

34. The permit holder shall maintain the following records electronically or in hard copy format for at least five years. These records shall be used to demonstrate compliance with the Special Conditions and the limits specified in the MAERT:
- A. Records of sulfur and heating value analyses as required by Special Condition 8.
  - B. Records of fuel gas usage, hours of operation of the fuel flow meters, and records of hours of operation of the Steam Methane Reformer and package boiler as required by Special Condition 9.
  - C. Records of hours of operation of the firewater pumps and emergency generator, as required by Special Condition 12.
  - D. Records for storage tanks as required by Special Condition 13.F.
  - E. Records of methanol loading rates as limited by Special Condition 15.
  - F. Records of flare flow, net heating value of gas sent to the flare, and hours of operation of the monitors and analyzers as required by Special Condition 16.D.
  - G. Records of temperature at the inlet to the catalyst bed, inside the catalyst bed and at the outlet of the catalyst bed in the catalytic oxidizer (EPNs VCO-1 and VCO-2) as required by Special Condition 17.B. **(03/17)**
  - H. Records to demonstrate compliance with the leak detection and repair requirements in Special Condition 18 and 19. **(03/17)**
  - I. Records of annual flange monitoring as required by Special Condition 19.
  - J. Records of cooling water VOC monitoring required by Special Condition 20.
  - K. Records of TDS and conductivity monitoring required by Special Condition 21.
  - L. Records of MSS activities as required by Special Conditions 22 - 29.
  - M. Records of initial and subsequent stack sampling required by Special Condition 30.

Date: September 11, 2018

**Permit 105050**

Attachment A

ROUTINE MAINTENANCE ACTIVITIES

Pump repair/replacement

Fugitive component (valve, pipe, flange) repair/replacement

Compressor repair/replacement

Heat exchanger repair/replacement

Vessel repair

Date: January 15, 2013

**Permit 105050**

Attachment B

MSS ACTIVITY SUMMARY

<b>Facilities</b>	<b>Description</b>	<b>Emissions Activity</b>	<b>EPN</b>
all process units	process unit shutdown/depressurize/drain	vent to flare	F-305 MSS-C
all process units	process unit purge/degas/drain	vent to atmosphere	MSS-U
all process units	process unit startup	vent to flare	F-305 MSS-C
all process units and tanks	preparation for facility/component repair/replacement	vent to flare	F-305 MSS-C
all process units and tanks	preparation for facility/component repair/replacement	vent to atmosphere	MSS-U
Tanks T-314A, T-314B, and T-324	tank roof landing	operation with landed roof	MSS-U
Tanks T-314A, T-314B, and T-324	degas of tank with landed roof	controlled degassing	F-305 MSS-C

Date: July 25, 2014