

# TECHNICAL REVIEW: AIR PERMIT BY RULE

<b>Permit No.:</b>	120769	<b>Company Name:</b>	Left Behind Recovery, LLC	<b>APD Reviewer:</b>	Mr. Tory Wingate
<b>Project No.:</b>	212397	<b>Unit Name:</b>	Grace Hamilton Tank Battery	<b>PBR No(s).:</b>	106.352(l) Effective Date: 11/22/2012

GENERAL INFORMATION			
<b>Regulated Entity No.:</b>	RN107294530	<b>Project Type:</b>	Permit by Rule Application
<b>Customer Reference No.:</b>	CN604583971	<b>Date Received by TCEQ:</b>	June 16, 2014
<b>Account No.:</b>	Not Assigned	<b>Date Received by Reviewer:</b>	July 16, 2014
<b>City/County:</b>	Dale, Caldwell County	<b>Physical Location:</b>	From HWY 183 & San Antonio St in Lockhart go 0.7 mi & take a slight L onto S Commerce St go 0.9 mi continue onto FM 1322 s & go 8.4 mi turn L onto FM 86 N & go 4.0 mi turn R onto FM 3158 & go 1.1 mi to lease road on the R

CONTACT INFORMATION					
<b>Responsible Official/ Primary Contact Name and Title:</b>	Mr. Forest Hamilton Attorney At Law	<b>Phone No.:</b> <b>Fax No.:</b>	(281) 734-4579	<b>Email</b> <b>:</b>	FORESTHAMILTON@GMAIL.COM
<b>Technical Contact/ Consultant Name and Title:</b>	Mr. Jeff Solecki Laboratory & Technical Services	<b>Phone No.:</b> <b>Fax No.:</b>	(972) 814-6945	<b>Email</b> <b>:</b>	JEFFS@ALLIEDTESTINGCO.COM

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?		X	
Are there affected NSR or Title V permits for the project?		X	
Is each PBR > 25/250 tpy?		X	
Are PBR sitewide emissions > 25/250 tpy?		X	
Are there permit limits on using PBRs at the site?		X	
Is PSD or Nonattainment netting required?		X	
Do NSPS, NESHAP, or MACT standards apply to this registration?		X	
Does NOx Cap and Trade apply to this registration?		X	
Is the facility in compliance with all other applicable rules and regulations?	X		

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### DESCRIBE OVERALL PROCESS AT THE SITE

Left Behind Recovery, LLC ("LBR") is seeking a Permit-By-Rule Air Permit authorization "PBR" for an oil production lease and facility (the Grace Hamilton Lease ("GH")) located 10 miles south of Dale, Texas in Caldwell County. The GH consists of one oil well and a tank battery (as well as ancillary plumbing and transfer equipment).

The GH's sole purpose is for removing, processing and storing fluids pumped from the wells of the lease for the purpose of selling crude oil. The facility is designed, built, and intended to be operated in accordance with 30 TAC §106.352. All tanks described herein are above-ground storage tanks ("AST"). The GH's wells remove fluids from the well bores which contain water, liquid hydrocarbons and entrained gases which they transmit/pump to the tank battery facility via a 2" steel flow line. These pumped fluids are received at the Gun Barrel and separated into the three streams – natural gas, crude oil, and produced water.

The gas stream is separated initially in the flume of the Gun Barrel and vented to atmosphere via a riser atop the flume. The exit point of this riser is 25' AGL. The hatch of the Gun Barrel has a double-acting relief valve set for 4 oz. (pressure) and .4 oz. (vacuum) and the headspace is vented to atmosphere through the double acting thief hatch so it can safely be assumed that the exit point of the emissions from the gun barrel (and flume) are at the 21' AGL.

The oil stream is separated by the stratification of the produced water and oil within the Gun Barrel. The oil on top of the water column exits the Gun Barrel and gravity flows into the top two oil stock tanks where it is stored until removal by oil gather for sale to the purchaser. As on the Gun Barrel, the oil tanks have the same double-acting relief valves built into the hatches on top. The headspace of these tanks is vented to the atmosphere via a riser which is 20' AGL and open-ended. Again, the settings on the relief hatches assure the emission point is 20' AGL.

Saltwater waste or "produced water" from the Gun Barrel is routed to a separate Produced Water Storage Tank via the "water leg" or plumbing which exits the bottom of the Gun Barrel to assure that only water exits. The water leg has a water riser with a vent to atmosphere (22' AGL) which controls the fluid level of the water within the Gun Barrel. The slight pressure drop at the water leg vent to atmosphere causes some entrained gases to escape the fluid and be vented at this point. The water storage tank is open-topped and stores the produced water until said produced water flows to a separate facility where the produced water is disposed at a separate SWD (Salt Water Disposal) facility.

The only mechanical feature of the GH is the artificial lift means at the well-head (pump jack) which lifts fluid to the surface and then to the gun barrel. The remainder of the facility functions off gravity for the flow involved in the entire process. If the pump jack either ceases to operate or is either shut down or started during any maintenance, there is no flow of the combined fluid from the well into the facility. As no fluid even leaves the well, there are no emissions to the atmosphere. Any emissions that would occur from the fluid in the facility's storage tanks is already included in the calculations made by E&P Tank 2.0 software utilized in this permitting application. As such, no MSS emissions are included in this application packet.

The facility has natural dirt roads on the property as well as under and around its tank battery facility. This lease/facility will operate in compliance with Title 30, Texas Administrative Code (30TAC) Section 106.352.

### DESCRIBE PROJECT AND INVOLVED PROCESS

Left Behind Recovery has submitted a PI-7 CERT and supporting documentation to certify this site under PBR rule 106.352.

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COMMUNICATION LOG				
Date	Time	Name/Company	Subject of Communication	
7/22/14	1120	Mr. Jeff Solecki / Allied Testing	Mr. Solecki, In regards to the Grace Hamilton Tank Battery registration number 120769, the following items need to be addressed to continue this review: <ul style="list-style-type: none"> <li>A detailed process description</li> <li>Truck loading emission</li> </ul> Per our phone call today you requested a deficiency letter be issued.	
7/23/14	1704	Mr. Jeff Solecki / Allied Testing	Mr. Wingate, I have revised the application and packaged it in a clearer and more understandable format. I hope this answers and satisfies any questions about the previous submission. These 2 files, the TCEQ emissions spreadsheet and a PDF with all supporting documentation, will replace all previously submitted data. If you have any additional questions, please let me know. Thanks and have a great day,	
7/29/14	1025	Mr. Jeff Solecki / Allied Testing	Per phone call, the reviewer confirmed that this site was tested for H <sub>2</sub> S and is a sweet site.	

Left Behind Recovery, LLC  
Grace Hamilton

ESTIMATED EMISSIONS														
EPN / Emission Source	VOC		NOx		CO		PM <sub>10</sub>		PM <sub>2.5</sub>		SO <sub>2</sub>		Other	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
FUG / Sitewide Fugitives	0.1439	0.6303									0	0		
O <sub>1</sub> / (3) Oil Tank	0.018	0.081									0	0		
O <sub>2</sub> / (4) Oil Tank	0.018	0.081									0	0		
W <sub>1</sub> / (1) Water Tank	0.014	0.063									0	0		
GB / (2) Gun Barrel	0.021	0.09									0	0		
LJ / Oil Output	0.0218	0.0953									0	0		
<b>TOTAL EMISSIONS (TPY):</b>	<b>0.24</b>	<b>1.04</b>									<b>0</b>	<b>0</b>		
<b>MAXIMUM OPERATING SCHEDULE:</b>	<b>Hours/Day</b>		<b>Days/Week</b>		<b>Weeks/Year</b>		<b>Hours/Year</b>		<b>Days/Year</b>		<b>Hours/Year</b>		<b>Days/Year</b>	
	24		7		52		8760							

SITE REVIEW / DISTANCE LIMIT	Yes	No	Description/Outcome	Date	Reviewed by
Site Review Required?		X	Site review not required	July 22, 2014	Mr. Tory Wingate
PBR Distance Limits Met?	X		Company claims distance limits will be met.	July 22, 2014	Mr. Tory Wingate

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
<b>SIGNATURE:</b>			
<b>PRINTED NAME:</b>	Mr. Tory Wingate	Ms. Dana Johnson	Ms. Anne Inman, P.E., Manager
<b>DATE:</b>	July 24, 2014	July 29, 2014	July 30, 2014

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<b>BASIS OF PROJECT POINTS</b>	<b>POINTS</b>
<i>Base Points: 352</i>	1
<i>Project Complexity Description and Points:</i> Complete in < 14 days	1
Technical Reviewer Project Points Assessment:	2
Final Reviewer Project Points Confirmation:	