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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 12, 2014

Mr. Scott Baber, Environmental Manager
Devon Gas Services LP
333 West Sheridan
Oklahoma City OK 73102-5010

RE: Compliance Evaluation Investigation at: East Rhome Compressor Station
Highway 114, Rhome, Wise County, Texas
TCEQ ID No.: WNo217K; RN100212539; CN601320484

Dear Mr. Baber:

On November 26, 2013, Ms. Robin Pugh of the Texas Commission on Environmental Quality (TCEQ) DFW Region Office conducted an investigation of the above-referenced facility to evaluate compliance with applicable requirements for air quality. No violations are being alleged as a result of the investigation; however, please see the attached Area of Concern. No further action is required at this time.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding these matters, please feel free to contact Ms. Pugh in the DFW Region Office at 817/588-5909.

Sincerely,

A handwritten signature in black ink that reads "Jaret Wessel".

Jaret A. Wessel
Barnett Shale Team Leader
DFW Region Office

JAW/tap

Enclosure: Copy of Investigation Report

RECEIVED

MAR 04 2014

TCEQ
CENTRAL FILE ROOM

AIR CO/ Reports

1st: WNo217K Vol: 001 11/26/2013 - 11/26/2013

CBC 100618479

IBC: 100638496



Summary of Investigation Findings

EAST RHOME COMPRESSOR STATION

6867 E HWY 114

RHOME, WISE COUNTY, TX 76078

Investigation #

1144426

Investigation Date: 11/26/2013

Additional ID(s): 2406
WN0217K
83910

AREA OF CONCERN

Track No: 524833

40 CFR Chapter 63.6650(b)

Alleged Violation:

Investigation: 1144426

Comment Date: 01/17/2014

A violation of 40 CFR 63.6650(b) is being alleged for failure to submit NESHAP 40 CFR 63, Subpart ZZZZ Semiannual Report for the July 1, 2012 to December 31, 2012 reporting period by January 31, 2013.

Recommended Corrective Action: The report was submitted to the Region office on March 5, 2013.

Resolution: The report was submitted to the Region office on March 5, 2013.

AIR_CO_WN0217K_RN100212539_RP_20131126_Investigation Report
Texas Commission on Environmental Quality
Investigation Report
Devon Gas Services, L.P.
CN601320484

EAST RHOME COMPRESSOR STATION

RN100212539

Investigation # 1144426

Incident #

Investigator: SARAH SLACK

Site Classification

MAJOR SOURCE

Conducted: 11/26/2013 – 11/26/2013

NAIC Code: 211111

SIC Code: 1311

Program(s): AIR OPERATING PERMITS
AIR NEW SOURCE
PERMITS

Investigation Type : Compliance Invest File Review

Location : FROM THE INTERSECTION
OF HWY 114 AND HWY 506 IN RHOME
TRAVEL EAST ON HWY 114
APPROXIMATELY 3.9 MILES FACILITY
IS NORTH OF HWY 114

Additional ID(s) : 2406
WN0217K
83910

Address: 6867 E HWY 114; RHOME,
TX 76078

Activity Type : REGION 04 - DFW METROPLEX
OPCC - AIR OPCC - OFFICE PERMIT
COMPLIANCE CERTIFICATION

Principal(s) :

Role	Name
RESPONDENT	DEVON GAS SERVICES LP

Contact(s) :

Role	Title	Name	Phone
Regulated Entity Mail Contact	ENVIRONMENTAL MANAGER	MR SCOTT BABER	Work (405) 659-8225
Regulated Entity Contact	EHS SPECIALIST	MR WARREN HINKLEY	Work (940) 394-2548 Fax (940) 394-2560

Other Staff Member(s) :

Role	Name
Supervisor	JARET WESSEL
QA Reviewer	JARET WESSEL

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
AIR GENERIC INVESTIGATION (10 ITEMS)	Devon East Rhome
AIR ANNUAL COMPLIANCE CERTIFICATION REVIEW - OPCC	Devon East Rhome

Investigation Comments :

INTRODUCTION:

EAST RHOME COMPRESSOR STATION - RHOME

11/26/2013 Inv. # - 1144426

Page 2 of 5

On November 26, 2016, a Compliance Investigation was conducted by, Ms. Sarah Slack, Environmental Investigator of the Texas Commission on Environmental Quality (TCEQ) DFW Region Office, Air Section, as an in-Office Permit Compliance Certification File Review (OPCC) for Devon Gas Services, L.P. (Devon), East Rhome Compressor Station (Devon-East Rhome), located 12.2 miles east of Rhome on Highway 114 E, Rhome, Wise County, Texas. The purpose of this investigation was to confirm compliance with applicable state and federal air quality regulations for a site with an issued Title V Federal Operating Permit (FOP) for the compliance period of August 01, 2013, through July 31, 2013.

Devon-East Rhome is authorized to operate under the provisions of Federal Operating Permit No. O-02406 (General Operating Permit (GOP) No. 514, Oil and Gas), issued on December 3, 2002 and renewed twice, once on May 23, 2007 and second time on July 15, 2011. The facility also operates under New Source Review (NSR) Standard Permit 83910 issued December 22, 2010 and reissued on September 19, 2012. The entity must demonstrate compliance with the requirements of Title 30 Texas Administrative Code (TAC) Chapter 122, including the permit conditions contained in 30 TAC 122.143-122.146 (Recordkeeping and Monitoring), 30 TAC 111.111 (Visible Emissions), and 30 TAC 115, 40 Code of Federal Regulations (CFR) Part 60, and 40 CFR Part 63.

The last Title V investigation for this facility was an on-Site Permit Compliance Investigation (SPCI) conducted on November 29, 2012, for the permit compliance period of August 01, 2011, through July 31, 2012.

Mr. Warren Hinkley, EHS Professional with Devon, participated in this investigation by phone and email.

Daily Narrative:

The facility is made up of seven compressor engines, three glycol dehydration units, one inlet separator and four holding tanks for condensate and salt water, and other associated equipment. A sound barrier lines the perimeter.

Devon-East Rhome submitted a permit compliance certification (PCC) on March 1, 2013, for the compliance period of February 1, 2012, through January 31, 2013. Devon-East Rhome also submitted a permit compliance certification (PCC) on August 29, 2013, for the compliance period of February 1, 2013, through July 31, 2013, meeting the certification requirements in 30 TAC Chapter 122. Both reports included certification by the responsible official. The next PCC required will be for a compliance period of August 1, 2013, through July 31, 2014.

The deviation report from Devon-East Rhome was received on March 4, 2013 (mailed registered mail on March 1, 2013) for the compliance period of August 1, 2012, through January 31, 2013 period and is considered timely. This report included certification by the responsible official.

Nine non-reportable emission events were reported during the compliance period of August 01, 2012, through January 31, 2013. All nine events were blowdowns and are determined not to be violations.

Devon-East Rhome reported deviations of 40 CFR 63.6625(a)(2) where the catalyst was out of outside the inlet temperature range for engines E-14, E-15, E-16, E-17, E-18, E-20 and E-22 For 19, 42, 13, 10, 15, 12 and 136 days respectively. This occurs on the low side of the temperature range when the engine is put on stand-by, starting up or shutting down. Mr. Hinkley was asked if any of these instances occurred during normal operating conditions. Mr. Hinkley stated Devon is unaware of any time the catalyst inlet temperature was out of range during normal operation. The MACT applicable engines are designed to shut down if the catalyst inlet temperature exceeds its operational range. These deviations are determined not to be violations.

Devon-East Rhome submitted their NESHAP 40 CFR 63, Subpart ZZZZ Semiannual Report for July 1, 2012 to December 31, 2012 on March 5, 2013. Pursuant to 40 CFR 63.6650(b), this report was due by January 31, 2013 and is considered late. This will be address as an Area of Concern (AOC). This report listed one deviation occurring from November 14, 2012 through November 16, 2012, for high formaldehyde readings (16 ppm) from engine E-15. The catalyst for

EAST RHOME COMPRESSOR STATION - RHOME

11/26/2013 Inv. # - 1144426

Page 3 of 5

this engine was change to correct this deviation. This deviation is covered under Devon-East Rhome's Startup, Shutdown and Malfunction Plan (SSM). Pursuant to 40 CFR 63 Subpart ZZZZ Table 1b, this deviation is determined not to be a violation.

The deviation report from Devon-East Rhome was received on March 4, 2013 (mailed registered mail March 1, 2013) for the compliance period of February 1, 2013, through July 31, 2013 period and is considered timely. This report included certification by the responsible official.

One non-reportable emission event was reported during the compliance period of February 01, 2013, through July 31, 2013. It was a blowdown and determined not to be a violation.

Devon-East Rhome reported deviations of 40 CFR 63.6625(a)(2) where the catalyst was out of outside the inlet temperature range for engines E-14, E-15, E-16, E-17, E-18, E-20 and E-22 For 7, 46, 12, 12, 13, 89 and 5 days respectively. This occurs on the low side of the temperature range when the engine is put on stand-by, starting up or shutting down. Mr. Hinkley was asked if any of these instances occurred during normal operating conditions. Mr. Hinkley stated Devon is unaware of any time the catalyst inlet temperature was out of range during normal operation. The MACT applicable engines are designed to shut down if the catalyst inlet temperature exceeds its operational range. These deviations are determined not to be violations.

Devon-East Rhome reported a deviation of 40 CFR 63.6650(b)(4) for failure to submit NESHAP 40 CFR 63, Subpart ZZZZ Semiannual Report for the July 1, 2012 to December 31, 2012 reporting period by January 31, 2013. The report was submitted to the Region office on March 5, 2013. This is a C.3 violation in accordance to the Enforcement Initiation Criteria Revision 14 dated December 1, 2012.

Devon-East Rhome submitted their NESHAP 40 CFR 63, Subpart ZZZZ Semiannual Report for January 1, 2013 to June 30, 2013 on July 24, 2013. Pursuant to 40 CFR 63.6650(b), this report was due by July 31, 2013 and is considered timely. This report listed one deviation occurring May 28, 2013 to June 4, 2013, for the Differential Transmitter Valve (DTP) left in the wrong position by third party calibration crew on engine E-18. This did not affect emissions or the collection of data, since the data involve only needs a representative point taken once a month. The valve was place to correct position to correct this deviation. This deviation is covered under Devon-East Rhome's Startup, Shutdown and Malfunction Plan (SSM). This deviation is determined not to be a violation. Devon-East Rhome included an updated Startup, Shutdown and Malfunction plan with this report. The investigator reviewed this plan and it appears to be acceptable.

Exit Interview:

On January 16, 2013, Mr. Hinkley was informed via telephone of the results on the investigation.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description:

Field natural gas (consisting primarily of pipeline quality natural gas and accumulated produced water) enters the facility; the gas/liquid stream is routed to the suction separator which removes the liquids from the gas stream. The liquids are routed to the Produced Water Storage Tanks for storage and subsequent removal from the Station via a tank truck loading operation. The gas stream from the separator is then routed to the compression portion of the Station. The engines compress the field natural gas from the suction pressure to the discharge pressure. Water is removed from the compressed natural gas stream via a glycol dehydration process. Triethylene Glycol is used to remove the water from the compressed natural gas steam through use of a contactor. The vapors and liquids from the dehydration process are routed to a condenser which further removes liquids. The liquids recovered in the dehydration process are routed to the Produced Water Storage Tanks and subsequently loaded into tank trucks for offsite disposal. The vapors from the condenser are further controlled with the use of an enclosed flare. The dehydrated natural gas stream is discharged to the sales line leaving the facility.

BACKGROUND

The regulated entity has a compliance history rating of 0.83 and a performance classification of

EAST RHOME COMPRESSOR STATION - RHOME

11/26/2013 Inv. # - 1144426

Page 4 of 5

Satisfactory. The customer has a compliance history rating of 5.15 and a performance classification of Satisfactory.

Monitoring Results:
Not applicable.

Current Enforcement Actions:
One violation is alleged as a result of this investigation:

A violation of 40 CFR 63.6650(b) is being alleged for failure to submit NESHAP 40 CFR 63, Subpart ZZZZ Semiannual Report for the July 1, 2012 to December 31, 2012 reporting period by January 31, 2013. The report was submitted to the Region office on March 5, 2013. This is a C.3 violation in accordance to the Enforcement Initiation Criteria, Revision 14 dated December 1, 2012. Since this site has not been cited for this violation within the previous twelve months and this violation was resolved prior to the investigation, this alleged violation will be handled as an Area of Concern.

Agreed Orders, Court Orders and Other Compliance Agreements:
There are no current air quality related orders or compliance agreements associated with this regulated entity.

Prior Enforcement Issues:
There have been three prior Notice of Violations issued to this regulated entity in the five years prior to this investigation.

There was a violation of 40 CFR 63.6645(g) and 40 CFR 63.7(b) (1). This was a resolved category C3 violation and was resolved with the receipt of testing notification received July 22, 2011. See investigation 1002006 for further details.

There was a violation of 30 TAC 116.115(b)(2)(F). This was a resolved category B19.g.1 violation and was resolved with the issuance of a modification to permit 83910 effective December 22, 2010. See investigation 1002006 for further details.

The violation was for failure to notify within 30 days after a change in the firing rate of a reboiler authorized under standard permit number 83910. The rule requires that "...Notice of changes in representations must be received by the executive director no later than 30 days after the change". The application for this modification was submitted November 24, 2010, therefore this violation is considered resolved. See violation tracking number 443690 for further information.

There have also been to Area of Concerns issued in the past five years regarding air quality.

An Area of Concern was also issued for failure to submit a notification of intent to conduct an initial performance test on an engine at least 60 days before the scheduled performance date. The notification was submitted August 3, 2010, therefore this issue is considered resolved. For further information see tracking number 443746.

An Area of Concern was issued for violation of 40 CFR 60.4243(b)(2)(ii) is being alleged because the annual performance test for units E-18 was conducted at greater than 8760 hours of operation since the previous test. This engine was tested June 25, 2012, therefore the violation is resolved. See investigation 1057078 for further details.

Complaints:
A review of the region files indicates there have been 2 complaints filed against this entity in the five years prior to this investigation. Incident 148555 was in regard to a water discharge concern. No violations were noted. See investigation 891036 for further details. Incident 148928 alleged odor nuisance. No nuisance was confirmed. See investigation 891036 for further detail.

ADDITIONAL INFORMATION/RECOMMENDATIONS

11/26/2013 Inv. # - 1144426

Page 5 of 5

Conclusions and Recommendations:

One Area of Concern has been noted as a result of this investigation. A Notice of Area of Concern will be sent to Devon Gas Services, L.P.

Additional Issues:

No additional issues were noted as a result of this investigation.

NOV Date
02/12/2014

Method
AREA OF CONCERN

AREA OF CONCERN

Track No: 524833

Resolution Status Date: 1/17/2014

Violation Start Date: 1/31/2013

Violation End Date: 3/5/2013

40 CFR Chapter 63.6650(b)

Alleged Violation:

Investigation: 1144426

Comment Date: 01/17/2014

A violation of 40 CFR 63.6650(b) is being alleged for failure to submit NESHAP 40 CFR 63, Subpart ZZZZ Semiannual Report for the July 1, 2012 to December 31, 2012 reporting period by January 31, 2013.

Recommended Corrective Action: The report was submitted to the Region office on March 5, 2013.

Resolution: The report was submitted to the Region office on March 5, 2013.

Signed


Environmental Investigator

Date

1/31/2014

Signed


Supervisor

Date

1/31/14

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

___ Letter to Facility (specify type) : _____

___ Investigation Report

___ Sample Analysis Results

___ Manifests

___ NOR

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

___ Other (specify) : _____