

Bryan W. Shaw, Ph.D., P.E., *Chairman*
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Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



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: Allison Compressor Station
County Road 4511, Decatur, Wise County, Texas
TCEQ ID No.: WN0234K; RN102913225; CN601320484

Dear Mr. Baber:

On November 19, 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 cursive script 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: WN0234K Vol: 001 11/19/2013 - 11/19/2013

CBC 100637506

IBC: 100638498



Summary of Investigation Findings

ALLISON COMPRESSOR STATION

Investigation #

1134797

Investigation Date: 11/19/2013

, WISE COUNTY,

Additional ID(s): WN0234K
2495

AREA OF CONCERN

Track No: 526330

30 TAC Chapter 113.1090

5C THSC Chapter 382.085(b)

Alleged Violation:

Investigation: 1134797

Comment Date: 02/04/2014

Failure to submit RICE MACT semi-annual compliance report within 30 days of the end of the compliance period. It was documented that the RICE MACT semi-annual compliance report for the period July 1, 2012-December 31, 2012 was due on January 30, 2013. This report was not received until March 6, 2013;34 days past the due date. This report was dated for March 5, 2013.

Recommended Corrective Action: Submit documentation of corrective action within 14 days.

Resolution: Semi-annual report was submitted on March 5, 2013. This was reported as a deviation in the subsequent deviation report.

Texas Commission on Environmental Quality

Investigation Report

Devon Gas Services, L.P.

CN601320484

ALLISON COMPRESSOR STATION

RN102913225

Investigation # 1134797

Incident #

Investigator: ROBIN PUGH

Site Classification

MAJOR SOURCE

Conducted: 11/19/2013 -- 11/19/2013

NAIC Code: 211111

SIC Code: 1311

Program(s): AIR OPERATING PERMITS

Investigation Type : Compliance Invest File Review

Location : FROM THE INTERSECTION
OF BUSINESS 81 & CR 4010 SOUTH OF
DECATUR TRAVEL EAST ON CR 4010
9.41 MI TURN RIGHT ON CR 4511
TRAVEL 1.02 MI FACILITY IS ON RIGHT

Additional ID(s) : WN0234K
2495

Address: ; ,

Activity Type : REGION 04 - DFW METROPLEX
OPCCFCE - AIR OPCCFCE - OFFICE
PERMIT COMPLIANCE CERTIFICATION
FOR IN-HOUSE FCE

Principal(s) :

Role

Name

RESPONDENT

DEVON GAS SERVICES LP

Contact(s) :

Role

Title

Name

Phone

Notified

EHS SPECIALIST

MR WARREN
HINKLEY

Regulated Entity Contact

ENVIRONMENTAL
MANAGER

MR SCOTT BABER

Other Staff Member(s) :

Role

Name

Supervisor
QA Reviewer

JARET WESSEL
JARET WESSEL

Associated Check List

Checklist Name

AIR GENERIC INVESTIGATION (10 ITEMS)
AIR ANNUAL COMPLIANCE CERTIFICATION
REVIEW - OPCCFCE

Unit Name

Violation
Allison

Investigation Comments :

INTRODUCTION

ALLISON COMPRESSOR STATION - DECATUR

11/19/2013 Inv. # - 1134797

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An investigation was conducted on Devon Gas Services LP. (Devon), Allison Compressor Station on November 19, 2013. The Allison Compressor Station is located about 1 mile south of the intersection of CR 4010 and CR 4511 southeast of Decatur in Wise County, Texas. This file review investigation was an Office Permit Compliance Certification In-House Full Compliance Investigation (OPCCFCE). The focus of the investigation was to determine compliance with Federal Air Quality Regulations under 40 Code of Federal Regulations (CFR) and Texas State regulations under 30 Texas Administrative Code (TAC). The primary focus was placed on the reporting period from August 1, 2012-July 31, 2013. This investigation was conducted by Environmental Investigator Robin Pugh of the Texas Commission on Environmental Quality (TCEQ), Dallas, Fort Worth Region. The last compliance investigation of this facility was conducted on November 27, 2012 and covered the reporting period of August 1, 2011-July 31, 2012. Title V General Operating Permit O2495 was reviewed in an Authorization to Operate letter dated July 27, 2011.

Daily Narrative

On November 19, 2013 the writer conducted an in-house file review of the Allison Compressor Station. A Permit Compliance Certification (PCC) and deviation report were submitted on March 4, 2013, for the compliance period of August 1, 2012 through January 31, 2013. The deadline of 30 days after the end of the compliance period was March 2, 2013. Since the 30th day fell on a Saturday and was a non-working day, the receipt of the DevRep and certification on the following Monday is within the required timeline. An OPCRO1 Form was submitted at this time. A PCC and deviation report for the compliance period of February 1, 2013 through July 31, 2013 were received on August 29, 2013. An OPCRO1 Form was submitted at this time. RICE MACT semi-annual compliance report for the period July 1, 2012-December 31, 2012 was due on January 30, 2013. This report was not received until March 6, 2013; 34 days past the due date. This report was dated for March 5, 2013. This late report was reported as a deviation on the subsequent DevRep. This is an Area of Concern (AOC) of 30 Texas Administrative Code 113.1090 in accordance with the 'Enforcement Initiation Criteria for Air, Water and Waste Violations' ('EIC'), Revision 14. This will be handled as an Area of Concern (AOC). The report for the period January 1, 2013 to June 30, 2013 was received on July 24, 2013, within the 30 day deadline.

Most deviations reviewed during this investigation were deviations that occurred due to maintenance activities or deviations that were carried over from the previous reporting period and addressed in a previous investigation. Catalyst temperature outside the required temperature range was reported for several engines. In each case it was later determined (See Attachment 1, Facility Communications) that the temperature measured was below the required parameters. Most of the reported instances occurred during times of shutdown when engine temperatures, and therefore, catalyst temperatures would be expected to be lower than normal. Catalyst temperatures were reported to return to normal with continued engine operation. Other reported instances were for times when no reading could be made due to power outage or electrical equipment malfunction. No violations were determined as a result of these deviations. The RICE MACT semi-annual compliance reports included deviations for a broken thermocouple wire and a formaldehyde reading above the required range. The thermocouple wire was replaced and the catalyst was changed to correct the formaldehyde. Since each of these deviations was properly reported and repaired, no violations are being alleged at this time.

Exit Interview

An Exit Interview Form detailing clarification of reported deviations was sent on December 17, 2013. The Exit Interview Form was discussed with Devon Gas Service LP, Environmental Health and Safety Professional, Warren Hinkley. A response was received on December 13, 2012 with follow-up information on December 26, 2013. An Exit Interview Form detailing the results of this investigation was sent via email and discussed via phone on January 12, 2014 (See Attachment 2, Exit Interview Forms).

GENERAL FACILITY AND PROCESS INFORMATION

Process Description

The Allison Compressor Station is a natural gas production facility permitted under Standard Permit Registration Number 84846 and Title V General Operating Permit Number O2495. Natural

ALLISON COMPRESSOR STATION - DECATUR

11/19/2013 Inv. # - 1134797

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gas stream enters the facility where liquids are removed and returned to the exit stream. Liquids may be sent to the slop tank to be trucked off the facility in the case of an emergency. The natural gas stream is compressed via seven on-site compressors and sent via pipeline for processing.

The Allison Compressor Station is permitted as a major source for formaldehyde.

BACKGROUND

This Regulated Entity has a compliance history rating of 9.80 and a performance classification of satisfactory. The Customer has a compliance history rating of 5.15 and a performance classification of satisfactory.

Current Enforcement Actions

One violation is being alleged for: failure to submit a RICE MACT semi-annual compliance report within 30 days of the end of the compliance period. Details can be found above.

Agreed Orders, Court Orders, and other Compliance Agreements

One Agreed Order (Docket No. 2011-0685-AIR-E) exists for this facility, effective December 19,, 2011, for failure to submit an accurate deviation report within 60 days of when it was due. A Notice of Compliance with this Agreed Order was sent on August 20, 2012. See investigation number 906651 for further details.

One Agreed Order (Docket No. 2012-1068-AIR-E) has been proposed for this facility for failure to conduct required testing and demonstrate compliance with Federal MACT RICE requirements. Approval of this Agreed Order is pending. See investigation number 988884 for further details.

Prior Enforcement Issues

An NOV was issued on January 7, 2010 and resolved for failure to submit performance test results within 60 days and for failure to certify accuracy and completeness of an annual compliance certification. This violation was resolved on June 23, 2010. See investigation number 785487 for further details.

An NOE was issued on April 20, 2011 for failure to submit an accurate deviation report within 60 days of when it was due. An Agreed Order was issued and is currently pending payment. See investigation number 906651, Enforcement Case Number 41592 for further details.

An NOE and NOV was issued on May 9, 2012 for failure to conduct JJJJ testing within 8760 engine hours, failure to conduct required testing and demonstrate compliance with Federal MACT RICE requirements, failure to report all deviations within a reporting period, and failure to submit a PCC within 30 days. See investigation Number 988884 and Enforcement Case Number 44217 for further details.

Complaints

A review of the region files indicates that no complaints have been filed against this regulated entity in the five years prior to this investigation.

ADDITIONAL INFORMATION

Conclusions and Recommendations

One violation is being alleged for: failure to submit a RICE MACT semi-annual compliance report within 30 days of the end of the compliance period. Details can be found above. No further violations were noted at this time. No further investigation is recommended at this time. An AOC letter will be sent to Devon Gas Services LP.

Additional Issues

None noted.

ALLISON COMPRESSOR STATION - DECATUR

11/19/2013 Inv. # - 1134797

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NOV Date
02/12/2014

Method
AREA OF CONCERN

AREA OF CONCERN

Track No: 526330

Resolution Status Date: 2/4/2014

Violation Start Date: 1/30/2013

Violation End Date: 3/5/2013

30 TAC Chapter 113.1090
5C THSC Chapter 382.085(b)

Alleged Violation:

Investigation: 1134797

Comment Date: 02/04/2014

Failure to submit RICE MACT semi-annual compliance report within 30 days of the end of the compliance period. It was documented that the RICE MACT semi-annual compliance report for the period July 1, 2012-December 31, 2012 was due on January 30, 2013. This report was not received until March 6, 2013; 34 days past the due date. This report was dated for March 5, 2013.

Recommended Corrective Action: Submit documentation of corrective action within 14 days.

Resolution: Semi-annual report was submitted on March 5, 2013. This was reported as a deviation in the subsequent deviation report.

Signed



Environmental Investigator

Date

2/4/14

Signed



Supervisor

Date

2/4/14

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

1 Correspondence from the facility

2 Other (specify) :

Exit Interview Forms

TCEQ
DFW Region

Attachment 1

Facility Communications

Customers: Devon Gas Services, LP
CN601320484

Regulated Entity: Allison Compressor Station
RN102913225

Investigation Number: 1134797
Investigation Date: November 19, 2013
Investigator: Robin Pugh
Number of Pages: 2

Robin Pugh

From: Hinkley, Warren <Warren.Hinkley@dvn.com>
Sent: Thursday, December 26, 2013 3:48 PM
To: Robin Pugh
Cc: Baber, Scott; Frazier, Billy
Subject: RE: Allison Compressor Station
Attachments: ALLI TCEQ EIF 2013-1217.pdf; ALLI Off Spec Catalyst Temp Events.pdf; ALLI 71012 E-15 Inlet Temp Event 2013-0818.pdf

Robin,

Please see below for the responses to the issues in the Exit Interview Form for the Devon Allison Compressor Station.

Issue No.1

Most of the instances of off spec inlet catalyst temperatures were due to engine downtime for PMs, repairs or on standby. All instances were below 450 deg F, the RICE MACT lower limit for 4-stroke lean-burn (4SLB) engines. All units are equipped with high temperature shutdowns set at 1250 deg F, which is below the upper allowable limit for 4SLB engines of 1350 deg F. Please see the second attachment for events other than PMs, repairs and on standby.

Issue No. 2

The wire that broke was the wire that transmits the signal from the pre-catalyst inlet temperature thermocouple of compressor engine unit no. DV071012 (EPN E-15), to the SCADA electronic data recording system. The wire broke at the thermocouple that is mounted in the exhaust piping for the engine, upstream of the catalytic converter housing. The wire broke at approximately 12:00 AM on Saturday, 8/18/2012, which is when the temperature readings stopped. The appropriate personnel were not informed about the malfunctioning thermocouple until the following week of 8/20/2013. The broken wire was replaced and the thermocouple restored to operation at 1:00 PM on Friday, 8/31/2012. Please see the third attachment for more information.

Thanks,

Warren Hinkley
EHS Professional
Devon Gas Services, L.P.
Bridgeport Gas Plant
(940) 394-2548 Ofc
(940) 393-5143 Cell

From: Robin Pugh [<mailto:robin.pugh@tceq.texas.gov>]
Sent: Tuesday, December 17, 2013 2:55 PM
To: Baber, Scott; Hinkley, Warren
Subject: Allison Compressor Station

Mr.'s. Hinkley and Baber,

I have attached an Exit Interview Form detailing records that I would like to complete my in house review of the Allison Compressor Station. Please contact me with any questions that you may have.

Robin Pugh
Environmental Investigator
TCEQ DFW Region 4
817/588-5909
Robin.Pugh@tceq.texas.gov

Confidentiality Warning: This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of all or any portion of this message and any attachments is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system.

TCEQ

DFW Region

Attachment 2

Exit Interview Forms

Customers: Devon Gas Services, LP
CN601320484

Regulated Entity: Allison Compressor Station
RN102913225

Investigation Number: 1134797
Investigation Date: November 19, 2013
Investigator: Robin Pugh
Number of Pages: 2

TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

Regulated Entity/Site Name	Devon Gas Services LP, Allison Compressor Station			TCEQ Add. ID No. RN No (optional)	102913225
Investigation Type	AIR OPCCF CE	Contact Made In-House (Y/N)		Purpose of Investigation	Determine compliance with TCEQ regulations and Federal Title V regulations.
Regulated Entity Contact	Scott Baber, Environmental Compliance			Telephone No.	405-228-8457
	Warren Hinkley			FAX #/Email address	Scott.Baber@dvn.com
				Date Contacted	12/17/2013
				FAX/Email date	12/17/2013

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCEQ findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation-report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.			
No.	Type ¹	Rule Citation (if known)	Description of Issue		
1	RR		Between 8/1/2012 and 7/31/2013 Engine catalyst temperatures were reported to have been recorded outside of the acceptable temperature range. Please provide the date and time for each occurrence. For each occurrence please define how far outside of the normal ranges they were and what was the reason found for these ranges? Did they occur during upset, maintenance or malfunction periods? What actions were taken to correct the temperature readings?		
2	RR		The semi-annual RICE MACT Compliance Report for the period ending 12/31/2012. Reported a broken TC wire on Engine E-15. Is this a broken thermocouple wire? Where is this wire located? (Catalyst? Emissions control?) Please document when and how this broken wire was noted and when it was repaired.		
			Please provide documentation by close of business 12/30/2013		

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.

 Investigator Name (Signed & Printed) Robin Pugh	Date 12/17/2013	Regulated Entity Representative Name (Signed & Printed) 	Date
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TCEQ EXIT INTERVIEW FORM: Potential Violations and/or Records Request

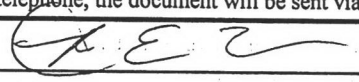
Regulated Entity/Site Name	Devon Gas Services LP, Allison Compressor Station			TCEQ Add. ID No.	102913225		
Investigation Type	AIR	Contact Made In-House (Y/N)		Purpose of Investigation	Determine compliance with TCEQ regulations and Federal Title V regulations.		
	OPCCF						
Regulated Entity Contact	Scott Baber, Environmental Compliance			Telephone No.	405-228-8457	Date Contacted	1/13/2014
				FAX #/Email address	Scott.Baber@dvn.com	FAX/Email date	1/13/2014
	Warren Hinkley						

NOTICE: The information provided in this form is intended to provide clarity to issues that have arisen during the investigation process between the TCEQ and the regulated entity named above and *does not represent final TCEQ findings related to violations*. Any potential or alleged violations discovered after the date on this form will be communicated to the regulated entity representative prior to the issuance of a notice of violation or enforcement. Conclusions drawn from this investigation, including additional violations or potential violations discovered (if any) during the course of this investigation, will be documented in a final investigation-report.

Issue		For Records Request, identify the necessary records, the company contact and date due to the agency. For Alleged and Potential Violation issues, include the rule in question with the clearly described potential problem. Other type of issues: fully describe.					
No.	Type ¹	Rule Citation (if known)	Description of Issue				
1	AV	30TAC 113.1090, 40 CFR 63.6650	Failure to submit the RICE MACT Semi-Annual Compliance Report for the period July 1, 2012-December 31, 2012 within 30 days of the end of the compliance period. This report was received on March 6, 2013. This will be recommended to be handled as a Notice of Violation (NOV) and resolved at this time.				

Note 1: Issue Type Can Be One or More of: AV (Alleged Violation), PV (Potential Violation), O (Other), or RR (Records Request)

Did the TCEQ document the regulated entity named above operating without proper authorization?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Did the investigator advise the regulated entity representative that continued operation is not authorized?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Document Acknowledgment. Signature on this document establishes only that the regulated entity (RE) representative received a copy of this document and associated continuation pages on the date noted. If contact was made by telephone, the document will be sent via FAX or Email to RE; therefore, the RE signature is not required.			
 Investigator Name (Signed & Printed) Robin Pugh	Date 1/13/2014	Regulated Entity Representative Name (Signed & Printed) 	Date

If you have questions about any information on this form, please contact your local TCEQ Regional Office.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, call 512/239-3282.