

AIR CP_100220052_CP_20190613_Investigation_1575631
Texas Commission on Environmental Quality
Investigation Report

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Customer: DCP Operating Company, LP
Customer Number: CN601229917

Regulated Entity Name: SNEED BOOSTER STATION

Regulated Entity Number: RN100220052

Investigation # 1575631

Incident Numbers

290957

Investigator: RANDA RALSTON

Site Classification PREVENTION OF
SIGNIFICANT
DETERIORATION

Conducted: 06/13/2019 -- 06/13/2019

SIC Code: 1311

NAIC Code: 211111

NAIC Code: 211112

Program(s): AIR NEW SOURCE PERMITS

Investigation Type: Compliance Invest File Review

Location: FROM SR 152 & US 287 IN DUMAS TX,
DRIVE 19.4 MI E ON SR 152 TURN S AND DRIVE 2
MI ON RANCH RD 1913 TURN SE AND DRIVE 0.2 MI
ON RANCH RD 1319 TURN S AND DRIVE 0.4 MI
SKELLY SCHOOL RD TO BOOSTER STATION ON
THE LEFT

Additional ID(s): PSDTX1104
83193
MR0029L

Address: ,
, ,

Local Unit: REGION 01 - AMARILLO

Activity Type(s): OG - Oil and Gas - AIR QUALITY High
Level
UML3IH - AIR UML3IH - IN HOUSE
UPSETMAINTENANCE LEVEL 3

Principal(s):

Role	Name
RESPONDENT	DCP OPERATING COMPANY LP

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT	ENVIRONMENTAL SPECIALIST	MR STEVE KUHN	Phone (806) 354-3651

Other Staff Member(s):

Role	Name
QA Reviewer	OMAR CANO
Supervisor	SUSAN THOMPSON

Associated Check List

Checklist Name

AIR EMISSIONS EVENT REVIEW (ON OR AFTER
01/05/2006)

Unit Name

UML3 - DCP Sneed

Investigation Comments:

INTRODUCTION

The purpose of this investigation is to evaluate an emissions event under the criteria for excessive emissions event determinations (30 TAC 101.222(a)) and under the affirmative defense criteria for non-excessive emissions events (30 TAC 101.222(b)).

GENERAL FACILITY AND PROCESS INFORMATION

Sneed Booster Station is a natural gas compressor station which includes a sulfur recovery unit and emergency acid gas flare.

BACKGROUND

Agreed Orders, Court Orders, and Other Compliance Agreements:
See Compliance History Report (attached).

Prior Enforcement Issues:
See Compliance History Report (attached).

Complaints:
The file review indicated that the Region 1 office has not received any complaints against the site in the last 2 years.

ADDITIONAL INFORMATION

Conclusions, Recommendations, and Current Enforcement Issues

Incident No. 290957

This emissions event occurred at this regulated entity on August 24, 2018. The event, which reportedly lasted 58 minutes, resulted in the release of a number of compounds, most notably about 794 pounds of sulfur dioxide and 9 pounds of hydrogen sulfide from the Emergency Acid Gas Flare, EPN FLR1.

On the final report, the company stated, "[The incident occurred] when Sneed's Emergency Acid Gas Flare (FLR1) released approximately 794 lbs of SO₂ and 8.6 lbs of H₂S on August 24, 2018 when the sulfur recovery unit (SRU) had to be restarted as a result of a power dip. Xcel Energy stated the power dip was caused by reclosure operations during foul weather in the area. The SRU was restarted after power was restored."

Excessive Emissions Events Assessment - 30 TAC §101.222(a). Excessive emissions event demonstrations:

Conclusions and Comments:

According to an analysis of the available information, this incident was found to be non-excessive.

Non-Excessive Emissions Events Assessment - 30 TAC §101.222(b). Non-excessive emissions event demonstrations:

All of the applicable demonstration criteria were reviewed and this incident was found to meet all of the affirmative defense criteria.

Conclusions and Comments:

Based on this review, this emissions event is subject to an affirmative defense for all claims, other than claims for administrative technical orders and actions for injunctive relief, if an enforcement action were pursued. Therefore, the agency is not pursuing enforcement action for this event. No violations were issued during this investigation.

No Violations Associated to this Investigation

Signed


Environmental Investigator

Date

06-14-2019

Signed


Supervisor

Date

~~13~~ST 13 AUG 2019**Attachments: (in order of final report submittal)**

☐ Enforcement Action Request (EAR)
☐ Letter to Facility (specify type) : _____
☐ Investigation Report
☐ Sample Analysis Results
☐ Manifests
☐ Notice of Registration

☐ Maps, Plans, Sketches
☐ Photographs
☒ Correspondence from the facility
☒ Other (specify) :

Compliance History

Confirm Initial Notification to Send to TCEQ
Regulated Entity: RN100220052 Today's date is: 08/24/2018

Incident Tracking Number:	290957			Incident Status:	OPEN
Submittal Type:	INITIAL NOTIFICATION				
Name of Owner or Operator:	DCP OPERATING COMPANY LP		Regulated Entity Number:	RN100220052	
Physical Location:	FROM SR 152 & US 287 IN DUMAS TX, DRIVE 19.4 MI E ON SR 152 TURN S AND DRIVE 2 MI ON RANCH RD 1913 TURN SE AND DRIVE 0.2 MI ON RANCH RD 1319 TURN S AND DRIVE 0.4 MI SKELLY SCHOOL RD TO BOOSTER STATION ON THE LEFT				
Event/Activity Type:	EMISSIONS EVENT				
Date and Time Event Discovered or Scheduled Activity Start:	08/24/2018 @ 07:10				
Event Duration:	0 hours, 58 minutes				
Process Unit or Area Common Names					
Sneed Booster					
Facility Common Name			Facility Identification Number (FIN)		
Sneed Emergency Acid Gas Flare			FLR1		
Emission Point Common Name:			Emission Point Number:		
Sneed Emergency Acid Gas Flare			FLR1		
List of Air Contaminant Compounds					
Description	Est. Quantity/Opacity	Units	Emission Limit	Units	Authorization
Carbon Monoxide	7.28	POUNDS	0		83193 and PSDTX1104
Hydrogen Sulfide	8.62	POUNDS	0		83193 and PSDTX1104
Nitrogen dioxide	0.18	POUNDS	0		83193 and PSDTX1104
Nitrogen oxide	3.64	POUNDS	0		83193 and PSDTX1104
Sulfur dioxide	793.64	POUNDS	0		83193 and PSDTX1104
VOC	0.001	POUNDS	0		83193 and PSDTX1104
Cause of Emission Event or Excess Opacity Event, or Reason for Scheduled Activity:					
Reportable Upset Emission Event: Sneed's Emergency Acid Gas Flare (FLR1) released approximately 794 lbs of SO2 and 8.6 lbs of H2S on August 24, 2018 when the sulfur recovery unit (SRU) had to be restarted as a result of a power dip. Currently DCP is waiting on a reply from Xcel Energy for the root cause of the power dip. The SRU was restarted after power was restored.					
Actions Taken, or Being Taken, to Minimize Emissions And/or Correct the Situation:					
Reportable Upset Emission Event: Sneed's Emergency Acid Gas Flare (FLR1) released approximately 794 lbs of SO2 and 8.6 lbs of H2S on August 24, 2018 when the sulfur recovery unit (SRU) had to be restarted as a result of a power dip. Currently DCP is waiting on a reply from Xcel Energy for the root cause of the power dip. The SRU was restarted after power was restored.					
Basis Used to Determine Quantities and Any Additional Information Necessary to Evaluate the Event:					
Carbon Monoxide: Decode(Sign(1000-1000), -1, 0.5496, 0.2755) {lb/mmBtu} * 26.41045 {mcf/event} * 1000 {Btu/scf} / 1000 {cf/mcf} Hydrogen Sulfide: 26.41045 {mcf/event} * 1000 {cf/mcf} * 0.1841715 {mole fraction} * 34.1 {lb/lb-mole} / 385 {scf/lb-mole} * (1 - 0.98) Nitrogen Dioxide: 0.138 {lb/mmBtu} * 26.41045 {mcf/event} * 1000 {Btu/scf} / 1000 {cf/mcf} * 0.05 Nitrogen Oxide: 0.138 {lb/mmBtu} * 26.41045 {mcf/event} * 1000 {Btu/scf} / 1000 {cf/mcf} * 0.95 Sulfur Dioxide: (430.81605 {lb/event for Hydrogen Sulfide} / 34.1 {lb/lb-mole for Hydrogen Sulfide}) * 64.1 {lb/lb-mole for SO2} * 0.98 {Control Efficiency} VOC: Sum of emissions: 0.00007 {lb/event for Propane}					
Person Making Notification:	Steve Kuhn		Date/Time:	08/24/2018 11:50:21 AM	
Notifier Phone:	806-3543651 ext:				

Incident Contact:	Steve Kuhn
Contact E-mail:	[REDACTED]
Contact Phone:	806-3543651 ext:
Notification Jurisdictions:	REGION 01 - AMARILLO
Affirmative Defense	The owner or operator of the regulated entity asserts this reported event or activity, as applicable, meets the applicable affirmative defense criteria. YES
Publication Status:	VERIFIED

I agree that data displayed in this report is the exact data or is acceptably equivalent to the data provided for the specified regulated entity, and the information is, to the best of my knowledge, true, accurate and complete. By entering my password and pressing the 'Confirm Submit' button, I agree that:

1. I am Steve R Kuhn, the owner of the STEERS account ER006502.
2. I have the authority to submit this data on behalf facility located at RN100220052.
3. I have personally examined the foregoing and am familiar with its content and the content of any attachments, and based upon my personal knowledge and/or inquiry of any individual responsible for information contained herein, that this information is true, accurate, and complete.
4. I further certify that I have not violated any term in my TCEQ STEERS participation agreement and that I have no reason to believe that the confidentiality or use of my password has been compromised at any time.
5. I understand that use of my password constitutes an electronic signature legally equivalent to my written signature.
6. I also understand that the attestations of fact contained herein pertain to the implementation, oversight and enforcement of a federal environmental program and must be true and complete to the best of my knowledge.
7. I am aware that criminal penalties may be imposed for statements or omissions that I know or have reason to believe are untrue or misleading.
8. I am knowingly and intentionally submitting 1 incident record.

This document was signed by Steve R Kuhn.

Signature Hash: 049C372CFECE1E2AABDC21E1962362EB35E9F580B59AFF3C2B5E56C942687CDE

The following is additional information contained in your Copy of Record:

Submission IP address: 63.117.98.228

Submission date and time: 08/24/2018 11:50:22 AM

Submission STEERS Version: 6.20

Submission Confirmation Number: 150373

Submission Data Hash Code: 2D82C33382D803A68E57DA3E79C7755B433A53F3C6BF8DEAFA27E6D940D62AD7

STEERS AEME Incident Id: 158283

Confirm Final Report of Incident 290957 to Send to TCEQ
Regulated Entity: RN100220052 Today's date is: 09/05/2018

Incident Tracking Number:	290957	Incident Status:	OPEN		
Submittal Type:	FINAL REPORT				
Name of Owner or Operator:	DCP OPERATING COMPANY LP	Regulated Entity Number:	RN100220052		
Physical Location:	FROM SR 152 & US 287 IN DUMAS TX, DRIVE 19.4 MI E ON SR 152 TURN S AND DRIVE 2 MI ON RANCH RD 1913 TURN SE AND DRIVE 0.2 MI ON RANCH RD 1319 TURN S AND DRIVE 0.4 MI SKELLY SCHOOL RD TO BOOSTER STATION ON THE LEFT				
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Event Duration:	0 hours, 58 minutes				
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Sneed Booster					
Facility Common Name		Facility Identification Number (FIN)			
Sneed Emergency Acid Gas Flare		FLR1			
Emission Point Common Name:		Emission Point Number:			
Sneed Emergency Acid Gas Flare		FLR1			
List of Air Contaminant Compounds					
Description	Est. Quantity/Opacity	Units	Emission Limit	Units	Authorization
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Hydrogen Sulfide	8.62000	POUNDS	0		83193 and PSDTX1104
Nitrogen dioxide	0.18000	POUNDS	0		83193 and PSDTX1104
Nitrogen oxide	3.64000	POUNDS	0		83193 and PSDTX1104
Sulfur dioxide	793.64000	POUNDS	0		83193 and PSDTX1104
VOC	0.00100	POUNDS	0		83193 and PSDTX1104
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Person Making Notification:	STEVE KUHN	Date/Time:	08/24/2018 @ 11:50:21 AM		
Notifier Phone:	806-3543651				

Incident Contact:	STEVE KUHN
Contact E-mail:	[REDACTED]
Contact Phone:	806-3543651
Notification Jurisdictions:	REGION 01 - AMARILLO
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Publication Status:	VERIFIED

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Submission IP address: 63.117.98.228

Submission date and time: 09/05/2018 04:10:23 PM

Submission STEERS Version: 6.20

Submission Confirmation Number: 150646

Submission Data Hash Code: 1BDE2EE21D949B7B037CD267F1A3E8CB0D2B5D3B5DF67059E60E1291E58C670B

STEERS AEME Incident Id: 158572



Compliance History Report

Compliance History Report for CN601229917, RN100220052, Rating Year 2018 which includes Compliance History (CH) components from September 1, 2013, through August 31, 2018.

Customer, Respondent, or Owner/Operator:	CN601229917, DCP Operating Company, LP	Classification: SATISFACTORY	Rating: 1.71
Regulated Entity:	RN100220052, SNEED BOOSTER STATION	Classification: SATISFACTORY	Rating: 10.61
Complexity Points:	11	Repeat Violator: NO	
CH Group:	03 - Oil and Gas Extraction		
Location:	FROM SR 152 & US 287 IN DUMAS TX, DRIVE 19.4 MI E ON SR 152 TURN S AND DRIVE 2 MI ON RANCH RD 1913 TURN SE AND DRIVE 0.2 MI ON RANCH RD 1319 TURN S AND DRIVE 0.4 MI SKELLY SCHOOL RD TO BOOSTER STATION ON THE LEFT MOORE, TX, MOORE COUNTY		
TCEQ Region:	REGION 01 - AMARILLO		

ID Number(s):

AIR OPERATING PERMITS ACCOUNT NUMBER MR0029L

TAX RELIEF ID NUMBER 16021

AIR NEW SOURCE PERMITS PERMIT 7894

AIR NEW SOURCE PERMITS PERMIT 73350

AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1104

AIR EMISSIONS INVENTORY ACCOUNT NUMBER MR0029L

AIR OPERATING PERMITS PERMIT 2568

AIR NEW SOURCE PERMITS AFS NUM 4834100014

AIR NEW SOURCE PERMITS ACCOUNT NUMBER MR0029L

AIR NEW SOURCE PERMITS REGISTRATION 38617

AIR NEW SOURCE PERMITS PERMIT 83193

Compliance History Period: September 01, 2013 to August 31, 2018 **Rating Year:** 2018 **Rating Date:** 09/01/2018

Date Compliance History Report Prepared: June 07, 2019

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: September 01, 2013 to August 31, 2018

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

Name: TCEQ Staff Member

Phone: (512) 239-1000

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: 04/18/2014 ADMINORDER 2013-1949-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 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)

5C THSC Chapter 382 382.085(b)

Rqmt Prov: Special Conditions No. 11 PERMIT

Special Terms and Conditions No. 7 OP

Description: Failed to maintain exhaust O2 concentrations at or above 3% in the TGI Stack on 116 instances during the period of January 1, 2011 and March 20, 2011.

2 Effective Date: 05/07/2015 ADMINORDER 2014-1481-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: STC No. 1.A. OP

Description: Failed to maintain the four-hour rolling average temperature of the stationary reciprocating internal combustion catalyst inlet greater than or equal to 750 degrees Fahrenheit ("°F"). Specifically, between July 14 and October 30, 2013, the four-hour rolling average catalyst inlet temperature for three Sandelius TC, Type K engines, Emissions Point Nos. ENG-28, ENG-30, and ENG-31, fell below 750°F on nine days for a total of 23 hours.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 113, SubChapter C 113.690
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT AA 63.642(b)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Permit Numbers 83193 and PSDTX1104 PERMIT

STC Nos. 1.A. OP

STC Nos. 8 OP

Description: Failed to maintain the sulfur recovery efficiency for the Sulfur Recovery Unit ("SRU") at a minimum of 98.5% on a daily average when the sulfur production rate exceeds five long tons per day. Specifically, on October 12, November 23, and December 8, 2013, from May 12 to 16, and on June 20 and 29, 2014, the sulfur recovery efficiency for the SRU fell below 98.5%.

3 Effective Date: 05/04/2017 ADMINORDER 2016-1281-AIR-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Federal Operating Permit No. O2568, Gen PERMIT

Description: Failed to submit an initial notification for Incident No. 231584 no later than 24 hours after the discovery of the emissions event, in violation of 30 TEX. ADMIN. CODE §§ 101.201(a)(1)(B) and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), and Federal Operating Permit ("FOP") No. O2568, General Terms and Conditions. Specifically, the initial notification was due by April 17, 2016 at 1:47 a.m., but was not submitted until April 18, 2016 at 10:18 p.m.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(3)
30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: Federal Operating Permit No. O2568, Gene PERMIT

Description: Failed to prevent unauthorized emissions, in violation of 30 TEX. ADMIN. CODE §§ 101.20(3), 116.115(b)(2) (F) and (c), and 122.143(4), TEX. HEALTH & SAFETY CODE § 382.085(b), FOP No. O2568, Special Terms and Conditions No. 8, and New Source Review Permit Nos. 83193 and PSDTX1104, Special Conditions No. 1. Specifically, the Respondent released 15,423.13 pounds of volatile organic compounds from the Sneed Booster Station Blowdown Vent during an emissions event (Incident No. 231584) that began on

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

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

Item 1	September 27, 2013	(1120676)
Item 0	September 30, 2013	(1122154)
Item 0	November 19, 2013	(1088278)
Item 0	December 13, 2013	(1134539)
Item 0	December 19, 2013	(1134721)
Item 0	January 07, 2014	(1135032)
Item 0	January 08, 2014	(1139703)
Item 0	January 14, 2014	(1139537)
Item 0	February 06, 2014	(1140275)
Item 0	February 10, 2014	(1143892)
Item 2	May 12, 2014	(1166498)

Compliance History Report for CN601229917, RN100220052, Rating Year 2018 which includes Compliance History (CH) components from September 01, 2013, through August 31, 2018.

Item 0	June 26, 2014	(1177912)
Item 0	September 04, 2014	(1192686)
Item 3	September 09, 2014	(1193011)
Item 0	October 28, 2014	(1204328)
Item 0	November 04, 2014	(1204496)
Item 0	December 15, 2014	(1215562)
Item 4	January 05, 2015	(1216494)
Item 0	February 09, 2015	(1223249)
Item 0	March 05, 2015	(1229758)
Item 0	March 27, 2015	(1230250)
Item 0	May 12, 2015	(1252118)
Item 0	May 14, 2015	(1252357)
Item 5	May 19, 2015	(1252810)
Item 0	June 22, 2015	(1258851)
Item 0	June 29, 2015	(1260035)
Item 0	June 30, 2015	(1260023)
Item 0	July 29, 2015	(1266854)
Item 0	August 11, 2015	(1268542)
Item 6	August 25, 2015	(1274383)
Item 0	September 24, 2015	(1280780)
Item 0	October 06, 2015	(1280903)
Item 0	October 29, 2015	(1288315)
Item 0	November 23, 2015	(1286685)
Item 7	February 26, 2016	(1314089)
Item 0	April 14, 2016	(1323692)
Item 0	April 15, 2016	(1323734)
Item 8	May 16, 2016	(1330977)
Item 0	May 31, 2016	(1329121)
Item 0	June 10, 2016	(1337327)
Item 0	August 22, 2016	(1356333)
Item 0	September 15, 2016	(1362901)
Item 0	November 03, 2016	(1371313)
Item 0	February 27, 2017	(1395876)
Item 9	May 19, 2017	(1415138)
Item 10	May 23, 2017	(1414699)
Item 0	March 19, 2018	(1477578)

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:	08/30/2018	(1512525)		
	Self Report?	NO		Classification:	Moderate
	Citation:	30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THSC Chapter 382 382.085(b) SC 4 of Permit No. 83193/PSDTX1104 PA			
	Description:	Failure to meet minimum sulfur recovery efficiency			
	Self Report?	NO		Classification:	Moderate
	Citation:	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) STC 1E of FOP O2568 PERMIT			
	Description:	Failure to maintain records to demonstrate continuous compliance with catalyst inlet temperature requirements			
	Self Report?	NO		Classification:	Moderate
	Citation:	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) STC 1E of FOP O2568 OP			
	Description:	Failure to record pressure drop across the catalyst on a monthly basis			

F. Environmental audits:

Compliance History Report for CN601229917, RN100220052, Rating Year 2018 which includes Compliance History (CH) components from September 01, 2013, through August 31, 2018.

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