Permit No.:	141713	Company Name:	ET Gathering & Processing LLC	APD Reviewer:	Ms. Camryn Appert
Project No.:	388976	Unit Name:	Jackson County Gas Plant	(-)	6002 - 116.620 PRE 2011-FEB-27

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GENERAL INFORMATION								
Regulated Entity No.:	RN106225436	Date Received by TCEQ:	February 18, 2025					
Customer Reference No.:	CN606187110	Date Received by Reviewer:	February 19, 2025					
City/County:	Ganado, Jackson County	Physical Location:	from ganado take fm 710 n for 4.5 mi to galow rd turn left & go 1.25 mi to site on right					

CONTACT INFORMATION									
Responsible Official/ Primary Contact Name and Title:	Thomas Becker Director - Environmental	Phone No.: Fax No.:	(210) 403-6482	Email:	THOMAS.BECKER@ENE RGYTRANSFER.COM				
Technical Contact/ Consultant Name and Title:	James Vanassche PE Senior Engineer - Environmental	Phone No.: Fax No.:	(214) 840-5217	Email:	JAMES.VANASSCHE@EN ERGYTRANSFER.COM				

GENERAL PROJECT INFORMATION	YES	NO	COMMENTS
Is confidential information included in the application?		Х	
Are there affected NSR or Title V permits for the project?	Х		Title V permit O3975
Are there permit limits on using PBRs at the site?		Х	
Is PSD or Nonattainment netting required?		Х	
Has the fee been paid?	Х		Reference / Receipt #: 750457 / 582EA000652552
Was an impacts evaluation required for the project?		Х	Only formaldehyde emissions are being revised based on vendor specifications
Have MSS emissions been accounted for in site-wide totals?		Х	MSS is being claimed under PBR 106.359
Site Specific Analysis used?	Х		
Are all vents ≥ 20 ft, and meet 620(a)(3) as applicable?	Х		vent height(s): ≥ 20 ft

Compliance History Evaluation - 30 TAC Chapter 60 Rules						
A compliance history report was reviewed on:	February 24, 2025					
Site rating & classification:	36.67 / Satisfactory					
Company rating & classification:	2.94 / Satisfactory					

PROJECT RULES	How was rule compliance demonstrated? (i.e., checklist, rule language, etc.)
116.620	Compliance is demonstrated with line-by-line rule applicability.

DESCRIBE THE OVERALL PROCESS AT THE SITE

ET Gathering & Processing LLC (ETGP) owns and operates the Jackson County Gas plant located in Jackson County, Texas.

The Jackson County Gas Plant is a natural gas processing plant consisting of four treating trains. Each train is comprised of inlet gas amine treating, glycol and molecular sieve dehydration, cryogenic NGL processing with propane refrigeration, and residue gas compression. Approximately 230 MMSCFD is processed by each train, for a plant-wide total of approximately 920 MMSCFD.

Inlet and Residue Gas Compression

Each of the four trains has the following:

- 2 x inlet compressors with dual-drive Caterpillar 3606 engines (C-100A through C-100H)
- 3 x refrigeration compressors with electric-driven engines
- 3 x residue compressors with dual-drive Caterpillar 3616 engines at Plants 1 through 3 (C-1121A through C-3121C). Plant 4 does not have dual-drives, but gas-driven only 3616's (C-4121A through C-4121C)

Dual drive technology allows the engines to be operated on either natural gas or electricity. The 1,775- horsepower dual-drive CAT 3606 engines are limited to an average of 3,500 hours per year of gas-fired operation, while the 4,735-horsepower dual-drive CAT 3616 engines are limited to an average of about 3,700 hours per year each. The engines at plant 4 are not dual-drives and are therefore evaluated at 8,760 hours per year of gas runtime. The dual-drive engines are primarily operated using gas during peak electrical seasons and when electrical supply to the site is insufficient or

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unavailable. The site is designed to operate continuously, but electrical supply to the site can vary, depending on the loads experienced by the electrical supplier. To avoid blackouts or rolling brownouts during periods of high electricity usage, ETC can switch to gas fired operations, thus providing the electricity supplier with added availability during high demand periods without the supplier needed to build additional generating capacity. In these circumstances, electricity will be made available to more dependent end users (i.e., residences, schools, hospitals, businesses, etc.).

For operational flexibility, ETC has a combined gas-firing operating limit for all the inlet compressors of 28,000 hrs/year and for all of the dual-drive residue compressors of 33,300 hr/yr. With this combined limit, an individual inlet or residue compressor engine may exceed 3,700 hr/yr, provided that the total gas runtime for each engine type does not exceed the combined limit.

All engines have associated maintenance, startup, and shutdown emissions, which are permitted via an unregistered 30 TAC §106.359 PBR for MSS. Each inlet or residue engine has an associated startup process during which a small amount of natural gas is vented. These emissions are routed to the flare for combustion. Compressor blowdowns for maintenance are directed to the compressor inlet suction, when possible, otherwise routed to the plant flare.

Hot Oil System

The purpose of the hot oil system is to provide heat to the plant processes. By using oil, the heat can be transferred to the process with a minimum loss of heat to the oil, allowing for a quicker recovery to the desired temperature in a closed-loop system. The hot oil system is a network of piping that circulates hot oil through each of the four plants and provides heat as needed in various areas of the plants to provide heat needed by the amine regeneration units and various heat exchangers within the plants. All heaters are equipped with Next Generation Ultra Low NOx Burners.

Amine Units

The amine units use amine contactors to remove the CO2 and H2S from the gas and NGL streams. Some hydrocarbons are also absorbed in the process. The rich amine is routed to amine reboilers and regenerated. The lean amine is then returned to the contactors for re-use in this closed-loop system. The waste gas from each amine regenerator is routed to a thermal oxidizer (TO) for combustion with a NMNE VOC destruction efficiency of greater than 99.9%. Emissions estimates provided in the calculations portion of this application apply a 99.5% destruction efficiency to NMNE VOC's, in the interest of maintaining conservative estimates.

TEG Dehydration Units

The dehydration units use TEG to remove water from the gas after passing through the amine units. Rich glycol is routed from the contactor towers to the reboilers, where heat from dedicated regeneration heaters is used to drive off the water from the glycol. Lean glycol is then returned to the contactors for re-use in this closed-loop system. Vapors from the rich glycol flash tanks are recycled to the burners of the regenerator gas heaters. The glycol regenerator still vent at each plant is routed to its respective TO for emission control.

Molecular Sieve Dehydration Units

From the TEG units, the gas is routed to the molecular sieve dehydration units, where water content is reduced further. The mole sieve regeneration heaters are used to heat a small amount of natural gas that is slip-streamed from the inlet gas line as needed to regenerate the beds. The gas is then routed back into the system. There are three beds in each mole sieve, and one bed is regenerated at a time. The mole sieve units do not have vents to the atmosphere. The inlet gas from the beds that are regenerated is routed back to the inlet suction. As such, the only emissions from these units are fugitive piping/equipment leaks and combustion-related emissions from the heaters.

Cryogenic Units

After the molecular sieve dehydration units, the propane-cooled cryogenic units remove heavier components to produce NGL by cooling the stream and reducing the stream pressure. The natural gas leaving the cryogenic units is lean and dry (i.e. pipeline quality gas). The NGL liquid product is then again treated by an amine contactor prior to exiting the site via pipeline.

Storage Tanks

The plants use two 500-bbl slop oil/oily wastewater tanks. The plants will also share ancillary tanks containing amine, glycol, waste oil, lube oil, waste coolant, hot oil, and sulfaguard. There is also a 12,000- gallon pressure vessel for propane.

Loading Operations

The slop oil/oily waste water tanks are each equipped with a loading connection, so that trucks may be loaded directly on an as-needed basis. Heat medium oil, lube oil, antifreeze, glycol, amine, and sulfaguard are received at the site via truck. Unloading emissions for these materials are accounted for in the working emissions for the respective tanks.

Equipment Components (piping)

Fugitive emissions may result from piping equipment leaks. The components that may leak include valves, flanges, pump seals, etc. ETC has implemented the TCEQ 28LAER LDAR program for applicable components. The number of components included in emission estimates is based on the most recent component counts.

DESCRIBE THE PROJECT

ETGP submitted an application to revise the emissions associated with oil and gas production under Standard Permit 116.620. Maintenance, startup and shutdown emissions (MSS) are authorized under claimed PBR 106.359.

Co-located at the gas plant property is the Jackson County Stabilizer, a liquids-handling facility that existed on the site property prior to construction of the gas plant. The stabilizer is authorized via PBR registration 99369 and has been assigned its own RN (RN106262975), as it is a separate and independent operation from the gas plant. The PBR will not be affected by this project.

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- With this revision, ETGP will be proposing the following:

 Replacing the Plant 1 Hot Oil Heater (EPN: H-1706) with a newer heater (EPNH-1706A)

 Revising the fugitive emissions based on updated site-specific gas analysis

 Updating compressor engine formaldehyde emissions

FEDERAL STANDARDS	EDERAL STANDARDS APPLICABILITY					
Applicable Rule(s):	Υ	NA	Explanation of how it meets (if applicable), or why it isn't applicable:			
NSPS Subpart Dc	Х		This subpart, regarding standards of performance for small steam generating units, is applicable to the four hot oil heaters at the site only, as process heaters are excluded from the definition of steam generating units in this rule.			
NSPS Subpark KKK	Х		This subpart does apply to the site since construction was commenced prior to August 23, 2011. For start of construction, ETGP committed funds and established contractual obligations for equipment purchases prior to August 23, 2011. Therefore, ETGP will continue to comply with the requirements of this rule.			
NSPS Subpart OOOO	Х		Construction of the plant commenced prior to August 23, 2011. As such, this subpart does not apply to gas processing, component leaks, or tanks. However, ETGP had not committed funds and established contractual obligations to purchase the compressors prior to August 23, 2011. Therefore, NSPS OOOO does apply to each reciprocating compressor affected facility.			
NSPS Subpart OOOOb		Х	The project does not constitute a modification or reconstruction to the process unit as the hot oil heater is a replacement unit that does not modify the existing process unit. The hot oil heater is also not a reconstructed unit. The updates to fugitive emissions are not a result of this replacement heater or other physical modifications to the process but are an update to the existing fugitive PTE for a more accurate PTE value as this fugitive emissions calculation had not been updated with actual counts or updated gas analysis in previous projects. The project does not increase production capacity of the process unit and is not a result of modifying the process.			
MACT Subpart HH	Х		The Plant will continue to comply with the requirements to keep on-site records of benzene emission determinations and natural gas flowrates for the dehydration units in compliance with this subpart.			
MACT Subpart ZZZZ	Х		All of the internal combustion engines at the Plant are classified as new RICE, and they comply with the requirements of MACT Subpart ZZZZ.			
MACT Subpart DDDDD	Х		This subpart affects the boilers and process heaters at the Plant, and they comply with the requirements of MACT Subpart DDDDD that include conducting periodic tune-ups. A one-time energy assessment was previously conducted.			

SITE INFORMATION							
What is the Natural Gas Throughput?	920	MMSCF/day					
What is the Oil/Condensate Throughput?	-	bbl/day					
What is the Produced Water Throughput?	-	bbl/day					
Site specific H2S content of inlet gas (ppm)	<24	ppm					

FACILITY INFORMATION						
Equipment:	# of each	Calculation Methodology				
Compressor Engines	19	Manufacturer data sheets and AP-42				
Storage Tanks	14	Emissions unchanged – calculations provided in previous projects				
Glycol Dehydrators	4	Emissions unchanged – calculations provided in previous projects				
Heater Treaters	12	Vendor specifications and AP-42, VOC emissions are calculated by multiplying the calculated TOC emissions by the concentration of NMNE components in the fuel gas.				
Amine Units	4	Emissions unchanged – calculations provided in previous projects				
Flares / Combustion Control Devices	4 TO 1 flare	Emissions unchanged – calculations provided in previous projects				

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Separators	Υ	
Truck Loading	Υ	Emissions unchanged – calculations provided in previous projects
Fugitives	Υ	TCEQ guidance

CONTROL DEVICE(S)											
Flare (2)	Destruction Efficiency:	98%	Controls what?	MSS and TO downtime							
Thermal Oxidizer (4)	Destruction Efficiency:	99.5%	Controls what?	Dehy unit after BTEX condensers							

Additional notes: The thermal oxidizers meeting the TCEQ control device requirements to support the 99.5% destruction efficiency.

Chemical	PBR Claimed	L, mg/m³	Emission Limit (E = L/K), lb/hr	Emission Limit tpy	Actual Emissions lb/hr	Actual Emissions tpy
Hydrogen Sulfide	106.261(a)(2)	10.0, [116.620(a)(17)]	1.25	5.00	<0.01	<0.01
Propane	106.261(a)(2)		6.00	10.00	1.83	8.02
Butanes	106.261(a)(2)		6.00	10.00	0.87	3.83
Pentanes	106.262	350	6.00	5.00	0.32	1.41
Hexanes	106.262	176	6.00	5.00	0.11	0.49
Heptanes	106.262	350	6.00	5.00	0.05	0.22
Octanes	106.262	350	6.00	5.00	0.02	0.08
Benzene	106.262	3	0.38	1.64	0.01	0.02
Toluene	106.262	188	6.00	5.00	0.01	0.03
Ethylbenzene	106.262	434	6.00	5.00	<0.01	<0.01
Xylene	106.262	434	6.00	5.00	<0.01	0.01
	•		Tota	al VOC Emissions:	3.22	14.11
			Tot	al H2S Emissions:	<0.01	<0.01

Note: Speciated emissions include fugitive and heater emission increases only.

ESTIMATED EMISSIONS																
EPN / Emission Source	voc		NOx		С	0	PM/PM:	10/PM 2.5	S	O ₂	H ₂	s	нсон		NH	1 3
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
						New E	missions	5								
H-1706A / Plant 1 Hot Oil Heater (New)	<0.01	<0.01	1.47	6.45	2.45	10.74	0.46	2.00	0.04	0.16	-		0.01	0.02		
						Revised	Emissio	ns								
C-100A / CAT 3606 Plant 1 Inlet Compressor Engine 1	0.99	-	1.96	-	0.75	-	0.13	-	<0.01	-	1		0.24	-		
C-100B / CAT 3606 Plant 1 Inlet Compressor Engine 2	0.99	-	1.96	-	0.75	-	0.13	-	<0.01	-	1		0.24	-		
C-100C / CAT 3606 Plant 2 Inlet Compressor Engine 1	0.99	-	1.96	-	0.75	-	0.13	-	<0.01	-	-		0.24	-		
C-100D / CAT 3606 Plant 2 Inlet Compressor Engine 2	0.99	-	1.96	-	0.75	-	0.13	-	<0.01	-	1		0.24	-		
C-100E / CAT 3606 Plant 3 Inlet Compressor Engine 1	0.99	-	1.96	-	0.75	-	0.13	-	<0.01	-			0.24	-		
C-100F / CAT 3606 Plant 3	0.99	-	1.96	-	0.75	-	0.13	-	<0.01	-			0.24	-		

APD Reviewer:

Ms. Camryn Appert

ET Gathering & Processing LLC

Permit No.:

141713

Company Name:

Project No.:	3889	76	Unit Nan	ne:	Jacks	on Coun	ty Gas P	lant			9	SP No(s).: 6002 - 116.620 PRE 2011-FEB-27			PRE		
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Inlet Compressor Engir	ne 2																
C-100G / CAT 3606 Pl 4 Inlet Compressor End 1		0.99	-	1.96	-	0.75	-	0.13	-	<0.01	-			0.24	-		
C-100H / CAT 3606 Pla 4 Inlet Compressor Eng 2		0.99	-	1.96	-	0.75	-	0.13	-	<0.01	-			0.24	-	-	
C-100A, B, C, D, E, F, / All I inlet engines combined Annual Ops (3,000 hrs/engine; 28,0 hrs per year total)		-	13.81	-	27.39	-	10.55	-	1.87	-	0.05			-	3.42		
Annual HCOH Emissio from all inlet engines	ns	-	3.42	-	-	-	-	-	-	-	-	-	-	-	-	-	-
P1-FUG / Plant 1 fugiti	ves	2.24	9.79									0.01	0.01				
P2-FUG / Plant 2 fugiti	ves	2.19	9.57									0.01	0.01				
P3-FUG / Plant 3 fugiti	ves	2.19	9.57									0.01	0.01				
P4-FUG / Plant 4 fugiti	ves	2.19	9.57									0.01	0.01				
			•			U	nchange	d Emiss	ions								ı
FS-800 / Emergency F Pilot and Sweep Gas to Flare				0.03	0.14	0.07	0.29										
C-1121A / CAT 3616 P 1 Residue Compressor Engine 1		2.63	-	0.52	-	2.01	-	0.36	-	0.01	-			0.16	-	0.19	-
C-1121B / CAT 3616 P 1 Residue Compressor Engine 2	lant	2.63	-	0.52	-	2.01	-	0.36	-	0.01	-			0.16	-	0.19	-
C-1121C / CAT 3616 F 1 Residue Compressor Engine 3		2.63	-	0.52	-	2.01	-	0.36	-	0.01	-			0.16	-	0.19	-
C-2121A / CAT 3616 P 2 Residue Compressor Engine 1		2.63	-	0.52	-	2.01	-	0.36	1	0.01	-			0.16	-	0.19	-
C-2121B / CAT 3616 P 2 Residue Compressor Engine 2		2.63	-	0.52	-	2.01	-	0.36	1	0.01	-			0.16	-	0.19	-
C-2121C / CAT 3616 F 2 Residue Compressor Engine 3		2.63	-	0.52	-	2.01	-	0.36	1	0.01	-			0.16	-	0.19	-
C-3121A / CAT 3616 P 3 Residue Compressor Engine 1		2.63	-	0.52	-	2.01	-	0.36	1	0.01	-			0.16	-	0.19	-
C-3121B / CAT 3616 P 3 Residue Compressor Engine 2	lant	2.63	-	0.52	-	2.01	-	0.36	-	0.01	-			0.16	-	0.19	-
C-3121C / CAT 3616 F 3 Residue Compressor Engine 3		2.63	-	0.52	-	2.01	-	0.36	-	0.01	-			0.16	-	0.19	-
RESIDUE / Combined residue engines Plant 3 (33,000 hrs/yr)	1, 2,	-	43.80	-	8.69	ı	33.46	1	5.91	-	0.15			-	3.16	-	2.69
Annual HCOH emissio	ns	-	3.16	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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nbined resi ant 1, 2, 3)	due																
		2.63	11.52	0.52	2.29	2.01	8.80	0.36	1.55	0.01	0.04			0.19	0.83	0.16	0.
		2.63	11.52	0.52	2.29	2.01	8.80	0.36	1.55	0.01	0.04			0.19	0.83	0.16	0.7
		2.63	11.52	0.52	2.29	2.01	8.80	0.36	1.55	0.01	0.04			0.19	0.83	0.16	0.7
OH emissio 4 residue	ns		2.50														
nt 1 Mol Sie ter	eve	<0.01	<0.01	0.35	1.22	0.80	2.80	0.07	0.25	0.01	0.02			<0.01	<0.01		
		<0.01	<0.01	0.15	0.66	0.35	1.51	0.03	0.14	<0.01	0.01			<0.01	<0.01		-
ant 2 Hot C	il	<0.01	<0.01	2.12	9.30	4.86	21.28	0.44	1.93	0.03	0.15			<0.01	0.02		-
ant 2 Mol S ter	ieve	<0.01	<0.01	0.35	1.22	0.80	2.80	0.07	0.25	0.01	0.02			<0.01	<0.01		-
		<0.01	<0.01	0.15	0.66	0.35	1.51	0.03	0.14	<0.01	0.01			<0.01	<0.01		-
ant 3 Hot C	il	<0.01	<0.01	2.12	9.30	4.86	21.28	0.44	1.93	0.03	0.15			<0.01	0.02		-
ant 3 Mol S ter	ieve	<0.01	<0.01	0.35	1.22	0.80	2.80	0.07	0.25	0.01	0.02			<0.01	<0.01		-
ant 3 TEG Heater	Dehy	<0.01	<0.01	0.15	0.66	0.35	1.51	0.03	0.14	<0.01	0.01			<0.01	<0.01	==	-
ant 4 Hot C	il	<0.01	<0.01	2.12	9.30	4.86	21.28	0.44	1.93	0.03	0.15			<0.01	0.02		-
ant 4 Mol S ter	ieve	<0.01	<0.01	0.35	1.22	0.80	2.80	0.07	0.25	0.01	0.02			<0.01	<0.01	1	-
ant 4 TEG n Heater	Unit	<0.01	<0.01	0.15	0.66	0.35	1.51	0.03	0.14	<0.01	0.01			<0.01	<0.01		-
Plant 1 TO				2.21	9.67	2.14	9.35	0.58	2.54								-
Plant 1 Ar Unit	nine	0.10	0.42							6.44	28.22	2 0.07	0.30				-
Plant 1 De Unit	ehy	0.09	0.40														-
Plant 2 TO				2.21	9.67	2.14	9.35	0.58	2.54								
Plant 2 Ar Unit	nine	0.10	0.42							6.44	28.22	2 0.07	0.30				
Plant 2 De	by	0.09	0.40														1
	inbined resident 1, 2, 3) CAT 3616 FC Compressor CAT 3616 FC Compres	nbined residue ant 1, 2, 3) CAT 3616 Plant Compressor CAT 3616 Plant Comp	Sect No.: 388976 Sect No	Sect No.: 388976 Unit Name Unit Na	Sect No.: 388976 Unit Name: Section Unit Name: Unit Name	Sect No.: 388976 Unit Name: Jacks	Description Section Description Desc	Sect No.: 388976 Unit Name: Jackson County Gas Plant 1, 2, 3) Replace CAT 3616 Plant Compressor 2.63 11.52 0.52 2.29 2.01 8.80			Decision Sassy Decision D	Sect No. 388976 Unit Name: Jackson County Gas Plant Section Sect	See No. 388976 Unit Name: Jackson County Gas Plant See No(s): See No(s)	SP No(s) SP No(s)	Part March September S	Description September Se	Second S

0.58

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2.54

6.44

28.22

0.07

0.30

Plant 3 TO

Unit

Plant 3 Amine

Plant 3 Dehy

0.10

0.09

0.42

0.40

TO-3901 / Plant 3 TO 2.21

9.67

2.14

9.35

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	Unit																
TO 4004 /	Plant 4 TO			2.21	9.67	2.14	9.35	0.58	2.54								
TO-4901 / Plant 4 TO	Plant 4 Amine Unit	0.10	0.42							6.44	28.22	0.07	0.30				
	Plant 4 Dehy Unit	0.09	0.40														
TK-812 / A	mine Tank	0.18	<0.01														
TK-835 / G	lycol Tank	0.04	<0.01														
TK-860A, T Tanks	K-860B / Slop	0.02	<0.01														
TK-832, TK Lube Oil Ta	(-839 / Waste anks	0.02	<0.01														
TK-LO-1 – Lube Oil Ta		0.02	<0.01														
TK-833, TK Coolant/Wa Tanks	aste Coolant	0.08	<0.01														
TK-834 / H	ot Oil Tank	0.01	<0.01														
TK1123 – T Sulfaguard		0.94	0.17														
P-617-621 Water Load	/ Slop/Waste ling	1.91	0.03														
тот	AL EMISSIONS (TPY):		143.23	-	123.64		199.92		31.94		113.93	-	1.24		9.15		4.82
MAXIMU	M OPERATING SCHEDULE:	_	Но	urs/Day	-	_	Days/We	eek		Week	s/Year			Hou	rs/Year	_	8,760*

Note: HCOH emissions are included in VOC emissions for the engines but not for the heaters.

*The heaters and engine hours of operation vary. See additional information in the process description and electronic file.

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
SIGNATURE:	Canning Approx	on man	Michael Patu
PRINTED NAME:	Ms. Camryn Appert	John Ma, Peer Reviewer	Michael Partee, Manager
DATE:	March 12, 2025	March 13, 2025	March 13, 2025