



March 6, 2025

Samuel Short
Director of Air Permits Division
Texas Commission on Environmental Quality
Air Permits Division, MC-163
12100 Park 35 Circle
Austin TX 78735

**Re: RPC Toll, LLC
Plains I Facility
Plains, Texas 79355
Standard Permit Registration No. 171720
RN Number: RN111658415
CN Number: CN606318897
Standard Permit Registration No. 171720 Modification Application –
BSI Project No. 1313217**

Dear Samuel Short:

Please find enclosed a Form PI-1S and supporting documents to modify Standard Permit Registration No. 171720 for the electric generating units (EGUs) located at the RPC Toll, LLC, (RPC) Plains I Facility (Facility) in Plains, Texas.

RPC is requesting to add two EGUs to the site, bringing the total number of EGUs onsite to six. Annual emissions associated with the EGUs will not increase as a result of this request as the annual emissions are requested to be capped based on four engines operating continuously throughout the year for a total of 35,040 hours per year. The number of fugitive components has also been updated in the emission calculations to account for the two additional EGUs. No other changes are requested at this time.

Should there be any questions regarding the application, please contact Ryan Pickett at 512.202.9629 or at ryan.pickett@bsigroup.com.

Regards,

Loren Ladd

Loren Ladd
Consulting Technician

Reviewed by:

Ryan Pickett

Ryan Pickett
Senior Consultant, Manager

cc: Darla Kuntz, HSE Manager – RPC Toll, LLC

Attachments

TCEQ Form PI-1S

Process Description

Process Flow Diagram

Area Map

Plot Plan

Emission Calculations

Form PI-1S
Registrations for Air Standard Permit
(Page 1)
Texas Commission on Environmental Quality

I. Registrant Information
A. Company or Other Legal Customer Name:
RPC Toll, LLC
B. Company Official Contact Information (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Other:)
Name: Darla Kuntz
Title: HSE Manager
Mailing Address: 820 Gessner Rd Suite 895
City: Houston
State: Texas
ZIP Code: 77024
Telephone No.: 281-635-3409
Fax No.:
Email Address: dkuntz@conduitpower.co
<i>All permit correspondence will be sent via email.</i>
C. Technical Contact Information (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Other:)
Name: Darla Kuntz
Title: HSE Manager
Company Name: RPC Toll, LLC
Mailing Address: 820 Gessner Rd Suite 895
City: Houston
State: Texas
ZIP Code: 77024
Telephone No.: 281-635-3409
Fax No.:
Email Address: dkuntz@conduitpower.co
II. Facility and Site Information
A. Name and Type of Facility
Facility Name: Plains I Facility
Type of Facility: ☒ Permanent ☐ Temporary

Form PI-1S
Registrations for Air Standard Permit
(Page 2)
Texas Commission on Environmental Quality

II. Facility and Site Information (<i>continued</i>)
For portable units, please provide the serial number of the equipment being authorized below.
Serial No(s):
B. Facility Location Information
Street Address:
If there is no street address, provide written driving directions to the site and provide the closest city or town, county, and ZIP code for the site (attach description if additional space is needed).
From Plains, TX, travel SW on U.S. HWY 82 for approximately 3.3 miles. Turn left (S) onto FM 1622 and
Continue for approximately 6.7 miles. Turn right onto an unnamed road and travel approximately 0.75 miles.
The site is located on the right side of the unnamed road.
City: Plains
County: Yoakum
ZIP Code:
C. Core Data Form (required for Standard Permits 6006, 6007, and 6013).
Is the Core Data Form (TCEQ Form 10400) attached? ☒ Yes ☐ No
Customer Reference Number (CN): CN606318897
Regulated Entity Number (RN): RN111658415
D. TCEQ Account Identification Number (if known):
E. Type of Action
☐ Initial Application ☒ Change to Registration ☐ Renewal ☐ Renewal Certification
For Change to Registration, Renewal, or Renewal Certification actions provide the following:
Registration Number: 171720
Expiration Date: 02/10/2033
F. Standard Permit Claimed: 6005 Electric Generating Unit
G. Previous Standard Exemption or PBR Registration Number:
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? ☐ Yes ☒ No
If "Yes," enter previous standard exemption number(s) and PBR registration number(s) and associated effective date in the spaces provided below.

Form PI-1S
Registrations for Air Standard Permit
(Page 3)
Texas Commission on Environmental Quality

II. Facility and Site Information (<i>continued</i>)
H. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit? ☐ Yes ☒ No
If "Yes," enter standard exemption number(s), PBR registration number(s), and Standard Permit registration number(s), and associated effective date in the spaces provided below.
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s) and Effective Date(s)
I. Other Air Preconstruction Permits
Are there any other air preconstruction permits at this site? ☐ Yes ☒ No
If "Yes," enter permit number(s) in the spaces provided below.
J. Affected Air Preconstruction Permits
Does the standard permit directly affect any permitted facility? ☐ Yes ☒ No
If "Yes," enter permit number(s) in the spaces provided below.
K. Federal Operating Permit (FOP) Requirements
Is this facility located at a site that is required to obtain a FOP pursuant to 30 TAC Chapter 122? ☒ Yes ☐ No ☐ To Be Determined
Check the requirements of 30 TAC Chapter 122 that will be triggered if this standard permit is approved (<i>check all that apply</i>).
☐ Initial Application for a FOP ☐ Significant Revision for a SOP ☐ Minor Revision for a SOP
☒ Operational Flexibility/Off Permit Notification for a SOP ☐ Revision for a GOP
☐ To be Determined ☐ None
Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. (<i>check all that apply</i>)
☒ SOP ☐ GOP ☐ GOP application/revision (submitted or under APD review) ☐ N/A
☐ SOP application/revision (submitted or under APD review)

Form PI-1S
Registrations for Air Standard Permit
(Page 4)
Texas Commission on Environmental Quality

III. Fee Information (go to www.tceq.texas.gov/epay to pay online)
A. Fee Amount: \$900
B. Voucher number from ePay:
IV. Public Notice (if applicable)
A. Responsible Person (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____
Name:
Title:
Company:
Mailing Address:
City:
State:
ZIP Code:
Telephone No.:
Fax No.:
Email Address:
B. Technical Contact (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Other:) _____
Name:
Title:
Company:
Mailing Address:
City:
State:
ZIP Code:
Telephone No.:
Fax No.:
Email Address:
C. Bilingual Notice
Is a bilingual program required by the Texas Education Code in the School District? ☐ Yes ☐ No
Are the children who attend either the elementary school or the middle school closest to your facility eligible to be enrolled in a bilingual program provided by the district? ☐ Yes ☐ No

Form PI-1S
Registrations for Air Standard Permit
(Page 5)
Texas Commission on Environmental Quality

IV. Public Notice (<i>continued</i>) (if applicable) (continued)
If "Yes," list which language(s) are required by the bilingual program below?
D. Small Business Classification and Alternate Public Notice
Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts? ☐ Yes ☐ No
Is the site a major source under 30 TAC Chapter 122, Federal Operating Permit Program? ☐ Yes ☐ No
Are the site emissions of any individual regulated air contaminant equal to or greater than 50 tpy? ☐ Yes ☐ No
Are the site emissions of all regulated air contaminant combined equal to or greater than 75 tpy? ☐ Yes ☐ No
V. Renewal Certification Option
A. Does the permitted facility emit an air contaminant on the Air Pollutant Watch List, and is the permitted facility located in an area on the watch list? ☐ Yes ☐ No
B. For facilities participating in the Houston/Galveston/Brazoria area (HGB) cap and trade program for highly reactive VOCs (HRVOCs), do the HRVOCs need to be speciated on the maximum allowable emission rates table (MAERT)? ☐ Yes ☐ No
C. Does the company and/or site have an unsatisfactory compliance history? ☐ Yes ☐ No
D. Are there any applications currently under review for this standard permit registration? ☐ Yes ☐ No
E. Are scheduled maintenance, startup, or shutdown emissions required to be included in the standard permit registration at this time? ☐ Yes ☐ No
F. Are any of the following actions being requested at the time of renewal: ☐ Yes ☐ No
1. Are there any facilities that have been permanently shutdown that are proposed to be removed from the standard permit registration? ☐ Yes ☐ No
2. Do changes need to be made to the standard permit registration in order to remain in compliance? ☐ Yes ☐ No
3. Are sources or facilities that have always been present and represented, but never identified in the standard permit registration, proposed to be included with this renewal? ☐ Yes ☐ No
4. Are there any changes to the current emission rates table being proposed? ☐ Yes ☐ No
<i>Note: If answers to all of the questions in Section V. Renewal Certification Option are "No," use the certification option and skip to Section VII. of this form. If the answers to any of the questions in Section V. Renewal Certification Option are "Yes," the certification option cannot be used.</i>
*If notice is applicable and comments are received in response to the public notice, the application does not qualify for the renewal certification option.

Form PI-1S
Registrations for Air Standard Permit
(Page 6)
Texas Commission on Environmental Quality

VI. Technical Information Including State and Federal Regulatory Requirements

Place a check next to the appropriate box to indicate what you have included in your submittal.

Note: Any technical or essential information needed to confirm that facilities are meeting the requirements of the standard permit must be provided. Not providing key information could result in an automatic deficiency and voiding of the project.

A. Standard Permit requirements
(Checklists are optional; however, your review will go faster if you provide applicable checklists.)

Did you demonstrate that the general requirements in 30 TAC Sections 116.610 and 116.615 are met? ☒ Yes ☐ No

Did you demonstrate that the individual requirements of the specific standard permit are met? ☒ Yes ☐ No

B. Confidential Information (All pages properly marked "CONFIDENTIAL"). ☒ Yes ☐ No

C. Process Flow Diagram. ☒ Yes ☐ No

D. Process Description. ☒ Yes ☐ No

E. Maximum Emissions Data and Calculations. ☒ Yes ☐ No

F. Plot Plan. ☒ Yes ☐ No

G. Projected Start Of Construction Date, Start Of Operation Date, and Length of Time at Site: ☒ Yes ☐ No

Projected Start of Construction (provide date): N/A

Projected Start of Operation (provide date): N/A

Length of Time at the Site: Permanent

VII. Delinquent Fees and Penalties

This form **will not be processed** until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at: www.tceq.texas.gov/agency/financial/fees/delin/index.html.

Form PI-1S
Registrations for Air Standard Permit
(Page 7)
Texas Commission on Environmental Quality

VIII. Signature Requirements

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA) the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name (printed): Darla Kuntz

Signature (original signature required):

IX. Copies of the Registration

The PI-1S application must be submitted through ePermits. No additional copies need to be sent to the Regional Office or local Air Pollution Control Program(s). The link to ePermits can be found here:

www3.tceq.texas.gov/steers/.

RPC Toll, LLC – Plains I Facility

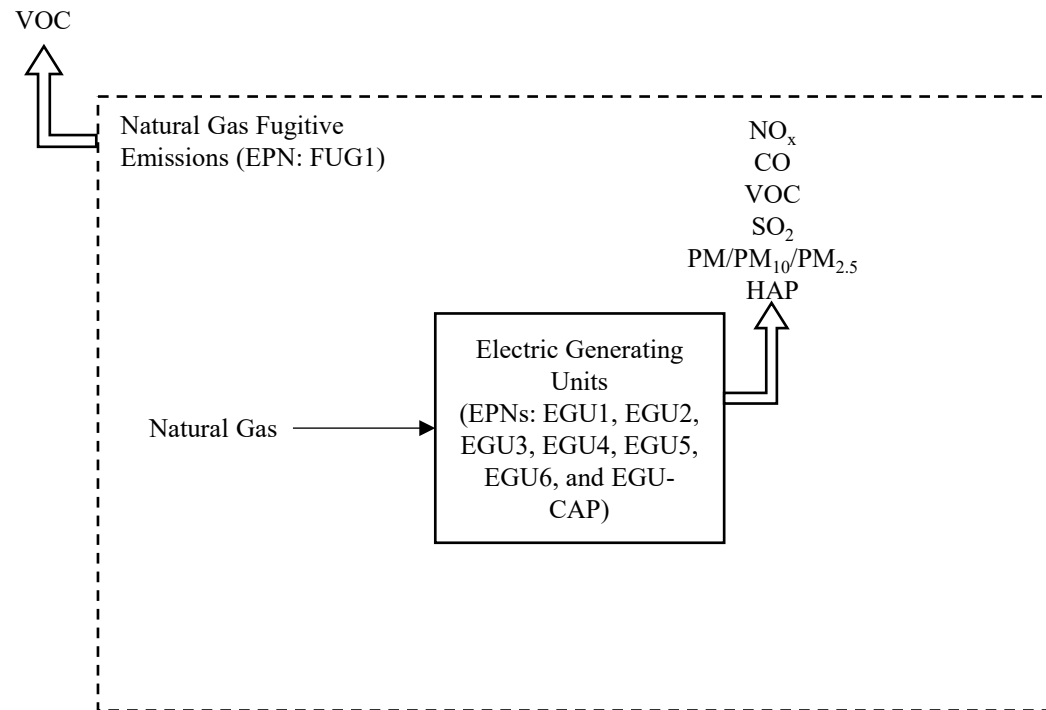
Process Description

RPC Toll, LLC (RPC) proposes to install and operate six 2.5-Megawatt (MW) mtu/Rolls-Royce pipeline quality natural gas-fired engines (Model: GG20V4000) at the Facility located near Plains, Texas to generate and provide non-emergency electrical power to oil and gas operations and the electrical grid. The proposed electric generating units (EGUs; Emission Point Numbers [EPNs] EGU1, EGU2, EGU3, EGU4, EUG5, and EUG6) are fired with pipeline-quality natural gas with a sulfur content of 10 grains per one hundred standard cubic feet (gr/100 scf) or less.

Although six engines are proposed to be onsite, the annual emissions are requested to be capped (EPN EGUCAP) based on continuous operation of four engines totaling 35,040 hours per year (hr/yr). Therefore, annual emissions associated with the EGUs are not increasing as a result of this request. Emissions are estimated using a combination of vendor supplied emission profiles and emission factors from United States Environmental Protection Agency (U.S. EPA) AP-42 Chapter 3.2, Table 3.2-1 for 2-stroke lean-burn engines.

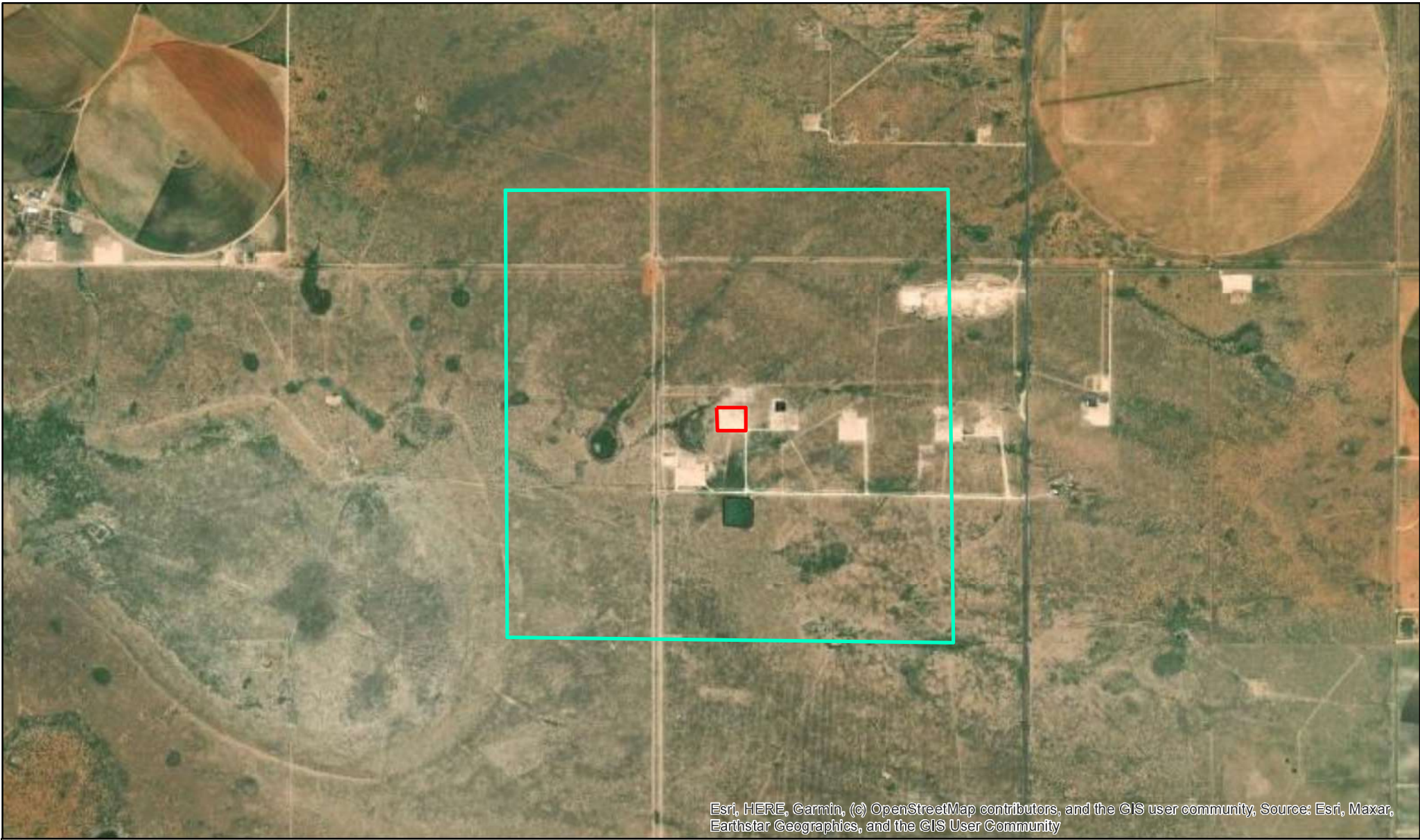
Fugitive component emissions (EPN FUG1) from the natural gas supply to the EGUs are calculated based on Oil and Gas Production Operation emission factors from Texas Commission on Environmental Quality (TCEQ) Fugitive Guidance (APDG 6422; June 2018).

RPC Toll, LLC Process Flow Diagram

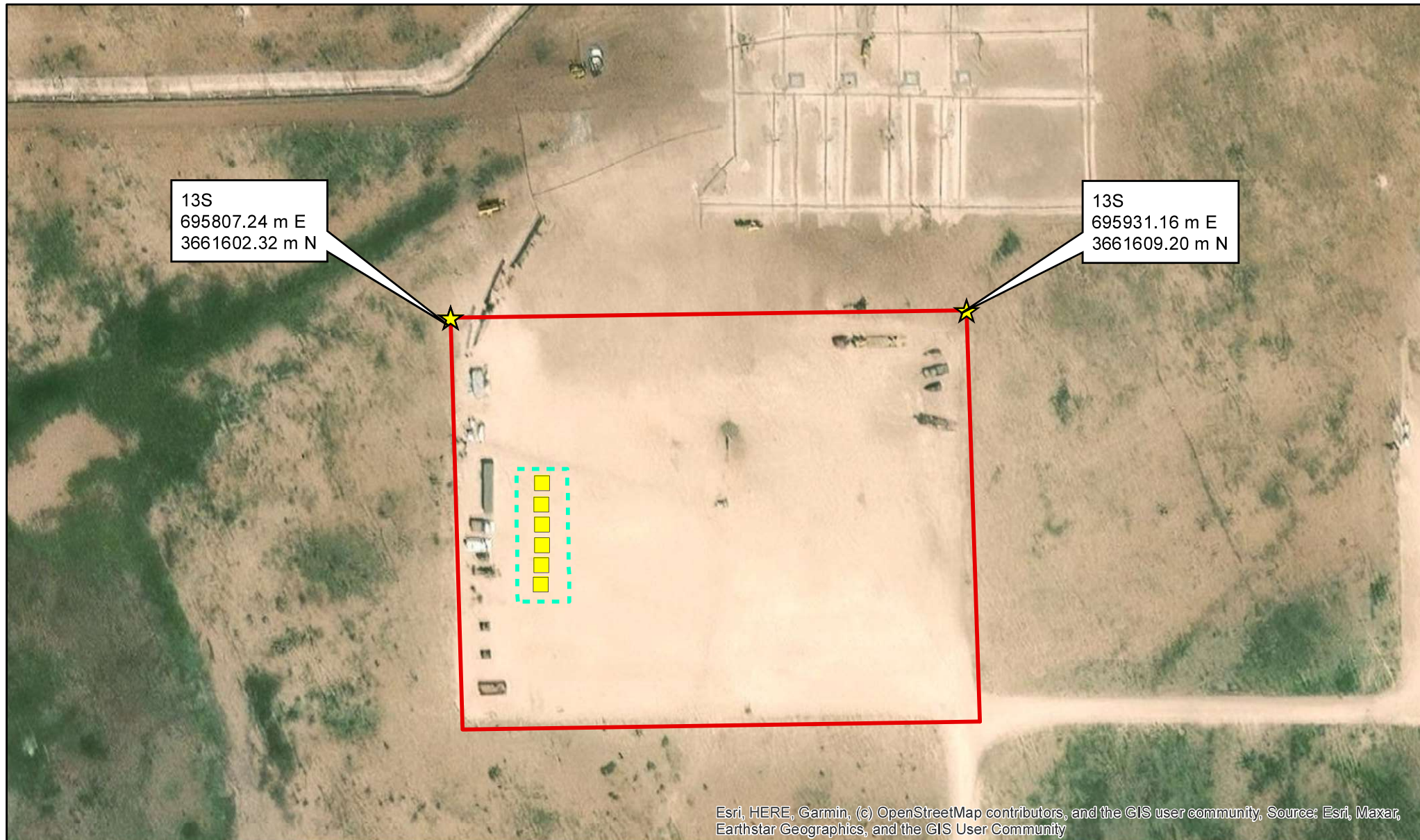


Legend

-  : Emissions to Atmosphere
 : Process Flow
 CO = Carbon Monoxide
 NO_x = Nitrogen Oxides
 PM = Particulate Matter
 PM₁₀ = Particulate Matter less than 10 microns in diameter
 PM_{2.5} = Particulate Matter less than 2.5 microns in diameter
 SO₂ = Sulfuric Dioxide
 VOC = Volatile Organic Compounds
 HAP = Hazardous Air Pollutant
 EPN = Emission Point Number



Legend Property Boundary Property Boundary 3,000 ft Buffer	Source: ESRI World Imagery Datum: WGS 1984	N	RPC Toll, LLC Plains I Facility Area Map
	bsi 7800 N. Mopac Expwy, Suite 325 Austin, TX 78759	Location: 33° 4'13.83"N -102° 54'6.17"W	01,2502,5005,000 Feet March 2025



Legend

- ★ Benchmark
- Proposed Fugitive Emissions
- Proposed EGU Locations
- ▭ Property Boundary

Source: ESRI World Imagery

Datum: WGS 1984



RPC Toll, LLC
Plains I Facility
Plot Plan Map



7800 N. Mopac Expwy, Suite 325
Austin, TX 78759

Location:
33° 4'13.83"N
-102° 54'6.17"W

0 70 140 280
Feet

March 2025

RPC Toll, LLC Emissions Summary

Emissions Summary

EPN	FIN	Source Name	NO _x		CO		VOC		PM ₁₀ /PM _{2.5}		SO ₂		HAP	
			(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
EGU1	EGU1	Electric Generating Unit 1	7.68	--	14.14	--	2.35	--	0.34	--	0.01	--	0.70	--
EGU2	EGU2	Electric Generating Unit 2	7.68	--	14.14	--	2.35	--	0.34	--	0.01	--	0.70	--
EGU3	EGU3	Electric Generating Unit 3	7.68	--	14.14	--	2.35	--	0.34	--	0.01	--	0.70	--
EGU4	EGU4	Electric Generating Unit 4	7.68	--	14.14	--	2.35	--	0.34	--	0.01	--	0.70	--
EGU5	EGU5	Electric Generating Unit 5	7.68	--	14.14	--	2.35	--	0.34	--	0.01	--	0.70	--
EGU6	EGU6	Electric Generating Unit 6	7.68	--	14.14	--	2.35	--	0.34	--	0.01	--	0.70	--
EGUCAP	EGUCAP	Electric Generating Units Annual Emissions Cap*	--	134.57	--	222.02	--	41.17	--	5.97	--	0.09	--	12.34
FUG1	FUG1	Natural Gas Fugitives	--	--	--	--	4.18E-03	0.02	--	--	--	--	--	--
Total			46.08	134.57	84.86	222.02	14.10	41.19	2.04	5.97	0.03	0.09	4.22	12.34
Title V (State) Major Source Threshold**			--	100	--	100	--	100	--	100	--	100	--	10/25
PSD (Federal) Major Source Threshold			--	250	--	250	--	250	--	250	--	250	--	250

Notes:

*Annual EGU emissions are capped based on four engines operating continuously throughout the year for a total of 35,040 hours per year.

**The major source threshold for a single HAP and any combination of HAPs is 10 tpy and 25 tpy, respectively.

RPC Toll, LLC
Emission Calculations - mtu/Rolls-Royce GG20V4000 Engines

Engine Data

Manufacture	mtu/Rolls-Royce	
Model	GG20V4000	
Engine Rating	3,486	hp
Engine Rating	2.60	MW
Engine Rating	8.872	MMBtu/hr
Operating Time	8,760	hr/yr
Collective Operating Time	35,040	hr/yr

EPN	FIN	Source Name	Pollutant	Engine Vendor Emission Factor g/kW-hr	Maximum Stack Testing Emission Factor g/kW-hr	Average Stack Testing Emission Factor g/kW-hr	AP-42 Emission Factor (lb/MMBtu)	Maximum Hourly Emission Rate (lb/hr)	Average Hourly Emission Rate (lb/hr)	Annual Emission Rate (tpy)
EGU1	EGU1	Electric Generating Unit 1	NO _x	1.34	--	--	--	7.68	--	See Annual Cap Below
			CO	--	2.47	2.21	--	14.14	12.67	
			VOC	0.41	--	--	--	2.35	--	
			PM ₁₀ /PM _{2.5}	--	--	--	0.0384	0.34	--	
			SO ₂	--	--	--	0.0006	0.01	--	
			HAP	--	--	--	0.0794	0.70	--	
EGU2	EGU2	Electric Generating Unit 2	NO _x	1.34	--	--	--	7.68	--	See Annual Cap Below
			CO	--	2.47	2.21	--	14.14	12.67	
			VOC	0.41	--	--	--	2.35	--	
			PM ₁₀ /PM _{2.5}	--	--	--	0.0384	0.34	--	
			SO ₂	--	--	--	0.0006	0.01	--	
			HAP	--	--	--	0.0794	0.70	--	
EGU3	EGU3	Electric Generating Unit 3	NO _x	1.34	--	--	--	7.68	--	See Annual Cap Below
			CO	--	2.47	2.21	--	14.14	12.67	
			VOC	0.41	--	--	--	2.35	--	
			PM ₁₀ /PM _{2.5}	--	--	--	0.0384	0.34	--	
			SO ₂	--	--	--	0.0006	0.01	--	
			HAP	--	--	--	0.0794	0.70	--	
EGU4	EGU4	Electric Generating Unit 4	NO _x	1.34	--	--	--	7.68	--	See Annual Cap Below
			CO	--	2.47	2.21	--	14.14	12.67	
			VOC	0.41	--	--	--	2.35	--	
			PM ₁₀ /PM _{2.5}	--	--	--	0.0384	0.34	--	
			SO ₂	--	--	--	0.0006	0.01	--	
			HAP	--	--	--	0.0794	0.70	--	
EGU5	EGU5	Electric Generating Unit 5	NO _x	1.34	--	--	--	7.68	--	See Annual Cap Below
			CO	--	2.47	2.21	--	14.14	12.67	
			VOC	0.41	--	--	--	2.35	--	
			PM ₁₀ /PM _{2.5}	--	--	--	0.0384	0.34	--	
			SO ₂	--	--	--	0.0006	0.01	--	
			HAP	--	--	--	0.0794	0.70	--	
EGU6	EGU6	Electric Generating Unit 6	NO _x	1.34	--	--	--	7.68	--	See Annual Cap Below
			CO	--	2.47	2.21	--	14.14	12.67	
			VOC	0.41	--	--	--	2.35	--	
			PM ₁₀ /PM _{2.5}	--	--	--	0.0384	0.34	--	
			SO ₂	--	--	--	0.0006	0.01	--	
			HAP	--	--	--	0.0794	0.70	--	
EGUCAP	EGUCAP	Electric Generating Units Annual Emissions Cap	NO _x	1.34	--	--	--	--	--	134.57
			CO	--	2.47	2.21	--	--	--	222.02
			VOC	0.41	--	--	--	--	--	41.17
			PM ₁₀ /PM _{2.5}	--	--	--	0.0384	--	--	5.97
			SO ₂	--	--	--	0.0006	--	--	0.09
			HAP	--	--	--	0.0794	--	--	12.34

Notes and Calculation Methodology:

Annual EGU emissions are capped based on four engines operating continuously throughout the year for a total of 35,040 hours per year.

NO_x and VOC emission factors are derived from vendor supplied emissions profiles.

CO emission factors are derived from recent stack testing results.

PM₁₀/PM_{2.5}, SO₂ and HAP emission factors are sourced from U.S. EPA AP-42 Chapter 3.2 Table 3.2-1 for 2-stroke lean-burn engines

HP provided by vendor and converted to MMBtu/hr.

NO_x, CO, VOC Hourly Emission Rate (lb/hr) = Engine Rating (MW) * 1,000 (kW/MW) * Emission Factor (g/kW-hr) * 0.002205 (lb/g)

PM₁₀/PM_{2.5}, SO₂, and HAP Hourly Emission Rate (lb/hr) = Emission Factor (lb/MMBtu) * Engine Rating (MMBtu/hr)

NO_x, VOC, PM₁₀/PM_{2.5}, SO₂ and HAP Annual Emission Rate (tpy) = Maximum Hourly Emission Rate (lb/hr) * Collective Operating Time (hr/yr) / 2,000 (lb/ton)

CO Annual Emission Rate (tpy) = Average Hourly Emission Rate (lb/hr) * Collective Operating Time (hr/yr) / 2,000 (lb/ton)

RPC Toll, LLC

Emission Calculations - Natural Gas Fugitives

EPN	Source Name	Equipment / Service	Contaminant	Gas and Oil Production Fugitive Emission Factor (lb/hr/component)	Hours of Operation (hr/yr)	Number of Components (#)	Non-methane, Non-ethane weight fraction of Natural Gas (%)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (tpy)
FUG1	Natural Gas Fugitives	Valves Gas/Vapor	VOC	0.00992	8,760	14	1.50%	0.0021	0.0091
		Flanges Gas/Vapor	VOC	0.00086	8,760	27	1.50%	0.0003	0.0015
		Compressors	VOC	0.0194	8,760	6	1.50%	0.0017	0.0076
Total								0.0042	0.0183

Notes and Calculation Methodology:

The number of components are estimated.

Hourly Emission Rate (lb/hr) = Gas and Oil Production Fugitive Emission Factor (lb/hr/component) * Number of Components * Non-methane, Non-ethane weight fraction of natural gas

Annual Emission Rate (tpy) = Hourly Emission Rate (lb/hr) * Hours of Operation (hr/yr) / 2,000 (lb/ton)