

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

GENERAL OPERATING PERMIT (GOP) INITIAL ISSUANCE

GOP Type:	514	Company:	Pinnacle Gas Treating LLC
Permit #:	O4736	Site:	Bethel Gas Treating Facility
Project #:	37945	Application Area:	Marquez Plant
Regulated Entity #:	RN104898978	Customer #:	CN603242611
Region:	9	County:	Robertson
NAICS Code:	211112	NAICS Name:	Natural Gas Liquid Extraction
Permit Reviewer:	Gabriela Chio		

SITE INFORMATION

Physical Location: From HWY 79/HWY 7 intersection in Marquez, go west on HWY 7, 5.3 miles. Turn left on CR 472. Go 1.9 miles, turn left (SE) on unnamed Rd. Go 0.7 miles. Facility is SE of the end of the Rd.

Nearest City: Marquez

Major Pollutants: NOX, SO2

Additional FOPs: None

PROJECT SUMMARY

Pinnacle Gas Treating LLC, Marquez Plant is a natural gas liquid extraction facility. An initial issuance application was received by TCEQ on March 27, 2025, for an Authorization to Operate (ATO) under GOP 514. Some of the significant emissions at the site include an amine unit, amine heaters, dehydration unit, engine generators, a thermal oxidizer, flares, a combustor, water tanks, water truck loading, fugitives, and maintenance, startup, and shutdown operations. All required forms were submitted to complete the initial issuance.

PROCESS DESCRIPTION

Approximately 400 MMSCFD sweet gas (approximately 4.7% CO₂, max 19 ppm H₂S, and negligible VOC) from area wells is combined and fed to the slug catcher/inlet separator. Natural gas from the slug catcher/inlet separator enters the amine unit contactor (AMINE-1). Rich amine, which contains hydrogen sulfide (H₂S) and carbon dioxide (CO₂), enters the amine regeneration unit (AMINE-1). The Amine HMO heaters (HT-1710 and HT-1711) provided heat to the amine to drive off the H₂S and CO₂. The amine unit flash gas is used as fuel for the heaters. The amine unit acid gas will be burned in a regenerative thermal oxidizer (TOx-1991). From the amine unit the gas is dehydrated in the glycol dehydration unit (DEHY-1). The dehydration unit flash tank gas is routed to the standard plant flare (FL-1990A). Glycol regenerator overhead is installed with a forced draft BTEX condenser with noncondensables vented to the dehy combustor (SpiralX). After dehydration the dehydrated sweet gas exits the plant.

Liquids (mostly produced water) from the inlet separators/filter coalescer are routed to the 1000-bbl produced water tanks (TK-1898 and TK-1899) through the closed drain drum (CDD). Produced water loaded out by trucks (TL-1). Inlet water flash from the CDD is routed the standard plant flare (FL-1990A). The standard plant flare also burns gas from pressure safety valves (PSVs) and any emergency blowdowns, and provides backup to the thermal oxidizer (TOx-1991). In addition, there are emissions from fugitive sources (FUG), and planned maintenance, start-up, and shut-down (MSS).

The six (6) IC engine driven generators (GEN-1 thru GEN-6) provide power for the facility only.

TECHNICAL REVIEW

Application/Project Summary

1. Were any of the GOP index Nos. submitted in this application revised or updated?..... Yes
a. Were any of these resolved without the submittal of a new UA form?..... No
2. Were provisional requirements or form OP-REQ3 submitted?..... Yes
3. Was form OP-REQ2 submitted?..... No
4. Were any high-level GOP index numbers included in the IMS for this project?..... Yes
5. Was Periodic Monitoring (PM) required and included in the IMS?..... No
6. Was Compliance Assurance Monitoring (CAM) required and included in the IMS?..... Yes
7. Was monitoring added in the IMS for emission limits identified in a Standard Permit or PBR?..... Yes

Permit reviewer notes:

- Forms OP-1, OP-ACPS, OP-REQ1, OP-REQ3, OP-MON, OP-SUM, OP-UA1, 2, 3, 6, 7, 10, and 62 were submitted to complete this initial issuance.
- The application was missing information and had errors but were resolved with the submittal of updated forms.

For units FL-1990B, FL-1990A, and Spiral X, the GOP index number in OP-UA7, Table 1 was updated from 511-12-001 to 514-04-004.

- Compliance Assurance Monitoring (CAM) was added for unit TOX-1991 for standard permit 176668 using GOP CAM number CAMG-OG-TI-002.
- OP-REQ3 was submitted to document applicability requirements for NSPS OOOOb for emission unit AMINE-1.
- High-level GOP index number, 514-NT-HLVL, was used for NSPS OOOOb for emission unit AMINE-1. The high-level GOP index number was used because at the time of this initial issuance application, GOP tables and OP-UA forms had not been developed for NSPS OOOOb.
- An updated OP-REQ1, pg. 89 and OP-PBR SUP were submitted by the applicant to incorporate the latest May 6, 2025, amendment date of standard permit registration no. 176668 and to add PBR 106.359.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on April 25, 2025
 Site rating: Unclassified Company rating: 6.14 / Satisfactory
 (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. If the compliance history is unsatisfactory, is the authorization renewal period less than 5 years?..... No
3. If the compliance history is unsatisfactory, is the permit recommended to be denied..... No
4. Was an OP-ACPS submitted and are any units not in compliance?..... No

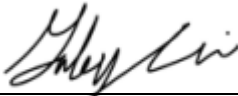
Delinquent Fee Check

1. The delinquent fee check was performed on 06/06/2025.
2. Were there any delinquent fees owed? No

IMPORTANT MILESTONES

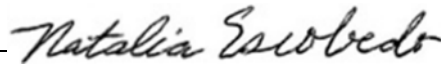
Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	03/27/2025	
Date Project Received by Engineer	04/25/2025	
Technical Review Period	04/25/2025	06/06/2025

EFFECTIVE PERMIT ISSUANCE DATE: July 3, 2025



 Gabriela Chio
 Permit Reviewer
 Operating Permits Section
 Air Permits Division

06/27/2025
 Date



 Natalia ESCOBEDO
 Team Leader
 Operating Permits Section
 Air Permit Division

06/27/2025
 Date

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