March 5, 2018

Mr. Matt Armstrong
Environmental Specialist IV
Williams – Operational Excellence
West Environmental Services
295 Chipeta Way
Salt Lake City, UT 84108

RE: NSPS KKK, OOOO, and OOOOa Leak Detection and Repair (LDAR) Monitoring Report – Ignacio Gas Plant, Williams Four Corners, LLC, Ignacio, Colorado

Dear Mr. Armstrong:

During July 1, 2017 through December 31, 2017, Trihydro Corporation (Trihydro) completed routine monthly monitoring for fugitive emissions as required by the Leak Detection and Repair (LDAR) program for the Williams Four Corners (Williams) Ignacio Gas Plant located near Ignacio, Colorado. The monitoring activities were completed to satisfy the requirements of the New Source Performance Standards (NSPS) Subpart KKK, Subpart OOOO, and Subpart OOOOa regulations. This report serves as the semiannual report required for submittal to the regulatory agencies.

## NSPS Subpart KKK Requirements

Subpart KKK requires that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, pressure-relief devices (PRDs), pumps, and compressors for which leaks were detected.
- The number of valves, PRDs, pumps, and compressors for which leaks were not repaired as required or placed on the delay of repair (DOR) list.
- The facility is required to report the reason for each DOR, the dates of process unit shutdowns that occurred within the reporting period and revisions to the component inventory.

## Subpart KKK Results

In accordance with USEPA Method 21 protocol, Trihydro personnel monitored components in volatile organic compound (VOC) service or in wet gas service. During the 6-month reporting period of July 2017 through December 2017, 16 leaks were detected from the components monitored. Repairs were completed on each of the components identified as leaking and received a passing inspection within

the 15-day deadline. The number of valves, pumps, pressure-relief devices, and compressors for which leaks were detected during the reporting period are included in Attachment A.

During the reporting period, 8 components were added to and 29 components were removed from the initial Subpart KKK inventory. The revisions made to the component inventory are provided in Attachment A.

## NSPS Subpart OOOO and Subpart OOOOa Requirements

Subpart OOOO and Subpart OOOOa requires that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, PRDs, pumps, compressors, and connectors for which leaks were detected.
- The number of valves, PRDs, pumps, compressors, and connectors for which leaks were not repaired as required or placed on the DOR list.
- The facility is required to report the reason for each DOR, the dates of process unit shutdowns that occurred within the reporting period and revisions to the component inventory.

## Subpart OOOO Results

In accordance with United States EPA Method 21 protocol, Trihydro personnel monitored components in VOC service or in wet gas service. During the 6-month reporting period of July 2017 through December 2017, 9 leaks were detected from the components monitored. Repairs were completed on each of the components identified as leaking and received a passing inspection within the 15-day deadline. The number of valves, pumps, PRDs, compressors, and connectors for which leaks were detected during the reporting period are presented in Attachment B.

There were no components added to and 6 components removed from the initial Subpart OOOO inventory during the reporting period and is reported in Attachment B.

## Subpart OOOOa Results

In accordance with United States EPA Method 21 protocol, Trihydro personnel monitored components in VOC service or in wet gas service. During the 6-month reporting period of July 2017 through December 2017, 14 leaks were detected from the components monitored. Repairs were completed on each of the components identified as leaking and received a passing inspection within the 15-day deadline. The number of valves, pumps, PRDs, compressors, and connectors for which leaks were detected during the reporting period are presented in Attachment C.

There were 6 components added and no components removed from the initial Subpart OOOOa inventory during the reporting period and is reporting in Attachment C.

The facility had no shutdowns that lasted longer than 24 hours during the reporting period.

If you have any questions and/or comments about this report, please do not hesitate to call us at (307) 745-7474.

Sincerely,
Trihydro Corporation

(b) (6) [redacted]

Calvin Niss
Vice President

(b) (6) [redacted]

Brian Palmer
Group Manager – LDAR Field Services

12Z-012-004

Attachments

# ATTACHMENT A

# NSPS KKK REPORT DATA

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - KKK

Williams Midstream - Ignacio

**Unit:** **Storage and Loading**

| # Components: | Valves: 868 | | Pumps: 13 | | Compressors: 0 | | PRVs: 39 | |
|---|---|---|---|---|---|---|---|---|
| # Added: | 7 | | 0 | | 0 | | 1 | |
| # Perm. OOS: | 27 | | 0 | | 0 | | 2 | |
| Month: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: |
| July 2017 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| August 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| September 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| October 2017 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| November 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| December 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

**Delay of Repairs:**

No Delay of Repairs Performed.

**Late Repairs:**

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - KKK

Williams Midstream - Ignacio

**Unit:** **TXP**

| # Components: | Valves: 683 | | Pumps: 9 | | Compressors: 0 | | PRVs: 6 | |
|---|---|---|---|---|---|---|---|---|
| # Perm. OOS: | 0 | | 0 | | 0 | | 0 | |
| Month: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: |
| July 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| August 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| September 2017 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| October 2017 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 |
| November 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| December 2017 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

**Delay of Repairs:**

No Delay of Repairs Performed.

**Late Repairs:**

No Late Repairs.

# ATTACHMENT B

# NSPS OOOO REPORT DATA

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOO

Williams Midstream - Ignacio

**Unit:** **INLET**

| Count: | Valves: 957 | | Pumps: 5 | | Compressors: 3 | | PRVs: 22 | | Connectors: 6869 | |
|---|---|---|---|---|---|---|---|---|---|---|
| # Added: | 0 | | 0 | | 0 | | 0 | | 0 | |
| # Removed: | 1 | | 0 | | 0 | | 1 | | 4 | |
| Month: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: |
| Jul 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Aug 2017 | 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sep 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Oct 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Nov 2017 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Dec 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 0 |

**Delay of Repairs:**

No Delay of Repairs Performed.

**Late Repairs:**

No Late Repairs.

# ATTACHMENT C

# NSPS OOOOa REPORT DATA

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOOa

Williams Midstream - Ignacio

**Unit:** **Amine Treatment**

| Count: | Valves: 403 | | Pumps: 0 | | Compressors: 0 | | PRVs: 12 | | Connectors: 1442 | |
|---|---|---|---|---|---|---|---|---|---|---|
| # Added: | 0 | | 0 | | 0 | | 0 | | 0 | |
| # Removed: | 0 | | 0 | | 0 | | 0 | | 0 | |
| Month: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: |
| Jul 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Aug 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sep 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 0 |
| Oct 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Nov 2017 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Dec 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

**Delay of Repairs:**

No Delay of Repairs Performed.

**Late Repairs:**

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: NSPS - OOOOa

Williams Midstream - Ignacio

**Unit:** **Dehy/Molesieve**

| Count: | Valves: | | Pumps: | | Compressors: | | PRVs: | | Connectors: | |
|---|---|---|---|---|---|---|---|---|---|---|
| # Added: | 235 | | 1 | | 0 | | 10 | | 917 | |
| # Removed: | 0 | | 0 | | 0 | | 0 | | 3 | |
| | 0 | | 0 | | 0 | | 0 | | 0 | |
| Month: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: |
| Jul 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Aug 2017 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Sep 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 6 | 0 |
| Oct 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 |
| Nov 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Dec 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

**Delay of Repairs:**

No Delay of Repairs Performed.

**Late Repairs:**

No Late Repairs.

**Williams Four Corners, LLC**
**Ignacio Gas Plant**
**SE ¼ of Section 35 and SW ¼ of Section 36,**
**Township 34 North, Range 9 West**
**La Plata County, Colorado**

***40 CFR Part 63 Subpart HH***
***Glycol dehydration unit proves vent standards***
***Semiannual Monitoring Report***

**Reporting Period – July 1, 2017 through December 31, 2017**

## East Dehydrator – Controlled by Thermal Oxidizer

### Reporting Requirements:

*40 CFR 63.775(e)(2)*

*The owner or operator shall include the information specified in paragraphs (e)(2)(i) through (ix) of this section, as applicable.*

*(i) The information required under §63.10(e)(3). For the purposes of this subpart and the information required under §63.10(e)(3), excursions (as defined in §63.773(d)(6)) shall be considered excess emissions.*

The continuous monitoring system is installed and operational. The information contained within this report shall be considered the continuous monitoring system performance report.

*(ii) A description of all excursions as defined in §63.773(d)(6) of this subpart that have occurred during the 6-month reporting period.*

> *(A) For each excursion caused when the daily average value of a monitored operating parameter is less than the minimum operating parameter limit (or, if applicable, greater than the maximum operating parameter limit), as specified in §63.773(d)(6)(i), the report must include the daily average values of the monitored parameter, the applicable operating parameter limit, and the date and duration of the period that the excursion occurred.*
>
> *(D) For each excursion caused by the lack of monitoring data, as specified in §63.773(d)(6)(iv), the report must include the date and duration of the period when the monitoring data were not collected and the reason why the data were not collected.*

No excursions as a result of daily average operating parameter value or lack of monitoring data occurred during this reporting period.

*(iii) For each inspection conducted in accordance with §63.773(c) during which a leak or defect is detected, the records specified in §63.774(b)(7) must be included in the next Periodic Report.*

Inspection of the closed vent system was conducted in August 2017.

*(v) For each closed-vent system with a bypass line subject to §63.771(c)(3)(i)(A), records required under §63.774(b)(4)(iii) of all periods when the vent stream is diverted from the control device through a*

*bypass line. For each closed-vent system with a bypass line subject to §63.771(c)(3)(i)(B), records required under §63.774(b)(4)(iv) of all periods in which the seal mechanism is broken, the bypass valve position has changed, or the key to unlock the bypass line valve was checked out.*

The bypass line, diverting flow from the thermal oxidizer to atmosphere, was open while the east dehydrator was operating on August 6, from 1:32 am to 5:11 am.

*(vii) The information in paragraphs (e)(2)(vii) (A) and (B) of this section shall be stated in the Periodic Report, when applicable.*

*(A) No excursions.*

An excursion, detailed above, associated with bypass of the thermal oxidizer occurred during this reporting period. No other excursions associated with the thermal oxidizer occurred during the reporting period.

*(B) No continuous monitoring system has been inoperative, out of control, repaired, or adjusted.*

The continuous monitoring system has been operative during the entire reporting period. No instances of out of control, repair or adjustment occurred. Annual maintenance/calibration occurred during the facility annual shutdown in April 2017.

*(viii) Any change in compliance methods as specified in §63.772(f).*

No change in compliance method occurred during the reporting period.

*(xi) The results of any periodic test as required in §63.772(e)(3) conducted during the reporting period.*

No periodic testing, in accordance with *§63.772(e)(3),* occurred on the thermal oxidizer during the reporting period.

## West Dehydrator – Controlled by Flare

### Reporting Requirements:

*40 CFR 63.775(e)(2)*

*The owner or operator shall include the information specified in paragraphs (e)(2)(i) through (ix) of this section, as applicable.*

*(i) The information required under §63.10(e)(3). For the purposes of this subpart and the information required under §63.10(e)(3), excursions (as defined in §63.773(d)(6)) shall be considered excess emissions.*

The continuous monitoring system is installed and operational. The information contained within this report shall be considered the continuous monitoring system performance report.

*(ii) A description of all excursions as defined in §63.773(d)(6) of this subpart that have occurred during the 6-month reporting period.*

*(A) For each excursion caused when the daily average value of a monitored operating parameter is less than the minimum operating parameter limit (or, if applicable, greater than the maximum operating parameter limit), as specified in §63.773(d)(6)(i), the report must include the daily average values of the monitored parameter, the applicable operating parameter limit, and the date and duration of the period that the excursion occurred.*

*(D) For each excursion caused by the lack of monitoring data, as specified in §63.773(d)(6)(iv), the report must include the date and duration of the period when the monitoring data were not collected and the reason why the data were not collected.*

No excursions as a result of daily average operating parameter value occurred during this reporting period.

*(iii) For each inspection conducted in accordance with §63.773(c) during which a leak or defect is detected, the records specified in §63.774(b)(7) must be included in the next Periodic Report.*

The annual visual inspection of the closed vent system associated with the flare was completed in August 2017.

*(v) For each closed-vent system with a bypass line subject to §63.771(c)(3)(i)(A), records required under §63.774(b)(4)(iii) of all periods when the vent stream is diverted from the control device through a bypass line. For each closed-vent system with a bypass line subject to §63.771(c)(3)(i)(B), records required under §63.774(b)(4)(iv) of all periods in which the seal mechanism is broken, the bypass valve position has changed, or the key to unlock the bypass line valve was checked out.*

There is no bypass line on the closed vent system from the west dehydrator regenerator to the flare.

*(vii) The information in paragraphs (e)(2)(vii) (A) and (B) of this section shall be stated in the Periodic Report, when applicable.*

*(A) No excursions.*

No excursions associated with the west dehydrator and flare system occurred during this reporting period.

*(B) No continuous monitoring system has been inoperative, out of control, repaired, or adjusted.*

The continuous monitoring system has been operative during the entire reporting period except during an event on August 5 from 6:00 pm to 8:00 pm. The event stemmed from the loss of control power, resulting in no collection of pilot data. However, while pilot indicator data is absent, visual observations made using the camera on the flare confirmed the pilot was lit and flare operations normal during the event. No other instances of out of control, repair or adjustment occurred during the reporting period. Annual maintenance/calibration occurred during the annual facility shutdown in April 2017.

*(viii) Any change in compliance methods as specified in §63.772(f).*

No change in compliance method occurred during the reporting period.

*(xi) The results of any periodic test as required in §63.772(e)(3) conducted during the reporting period.*

No periodic testing on the flare occurred during the reporting period.

March 5, 2018

Mr. Matt Armstrong
Environmental Specialist IV
Williams – Operational Excellence
West Environmental Services
295 Chipeta Way
Salt Lake City, UT 84108

RE: Semiannual MACT Subpart HH LDAR Monitoring Report – Williams Four Corners, LLC - Ignacio Gas Plant, Ignacio, Colorado

Dear Mr. Armstrong:

During July 1, 2017 through December 31, 2017, routine monthly Leak Detection and Repair (LDAR) monitoring for fugitive emissions was completed for Williams Four Corners (Williams) Ignacio Gas Plant located near Ignacio, Colorado. The monitoring activities were completed to satisfy the requirements of the Maximum Achievable Control Technology (MACT) Subpart HH regulation. This report serves as the semiannual report required for submittal to the regulatory agencies.

## MACT Subpart HH Requirements

Subpart HH requires that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, pressure-relief devices (PRDs), pumps, and compressors for which leaks were detected.
- The number of valves, PRDs, pumps, and compressors for which leaks were not repaired as required or placed on the delay of repair (DOR) list.
- The facility is required to report the reason for each DOR, the dates of process unit shutdowns that occurred within the reporting period and revisions to the component inventory.

## Results

In accordance with United States Environmental Protection Agency (EPA) Method 21 protocol, Trihydro personnel monitored components in volatile hazardous air pollutant (VHAP) service with concentrations greater than 10 percent by weight. During the 6-month reporting period of July 2017 through December 2017, 9 leaks were detected from the components monitored. Repairs were completed on each of the components identified as leaking and received a passing inspection within the 15-day deadline.

The number of valves, pumps, PRDs, and compressors for which leaks were detected during the reporting period are included in Attachment A.

There were 6 components added and 5 components removed from the initial inventory during the reporting period. The revisions to the initial inventory are report in Attachment A.

The facility had no shutdowns that lasted longer than 24 hours during the reporting period.

If you have any questions and/or comments concerning this matter, please do not hesitate to call us at (307) 745-7474.

Sincerely,
Trihydro Corporation

(b) (6) [redacted]

Cal Niss
Vice President

(b) (6) [redacted]

Brian Palmer
Group Manager – LDAR Field Services

12Z-012-004

Attachment

# ATTACHMENT A

# MACT HH SEMIANNUAL REPORT DATA

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: MACTHH

Williams Midstream - Ignacio

**Unit:** **FRAC**

| # Components: | Valves: 35 | | Pumps: 0 | | Compressors: 0 | | PRVs: 0 | |
|---|---|---|---|---|---|---|---|---|
| # Perm. OOS: | 0 | | 0 | | 0 | | 0 | |
| Month: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: |
| July 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| August 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| September 2017 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| October 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| November 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| December 2017 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

**Delay of Repairs:**

No Delay of Repairs Performed.

**Late Repairs:**

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: MACTHH

Williams Midstream - Ignacio

**Unit:** **INLET**

| # Components: | Valves: 260 | | Pumps: 2 | | Compressors: 0 | | PRVs: 1 | |
|---|---|---|---|---|---|---|---|---|
| # Added: | 0 | | 0 | | 0 | | 0 | |
| # Perm. OOS: | 1 | | 0 | | 0 | | 0 | |
| Month: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: |
| July 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| August 2017 | 2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| September 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| October 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| November 2017 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| December 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

**Delay of Repairs:**

No Delay of Repairs Performed.

**Late Repairs:**

No Late Repairs.

# Semi-Annual Report

From: 7/1/2017 To: 12/31/2017, Rule: MACTHH

Williams Midstream - Ignacio

**Unit:** **Storage and Loading**

| # Components: | Valves: 227 | | Pumps: 6 | | Compressors: 0 | | PRVs: 7 | |
|---|---|---|---|---|---|---|---|---|
| # Added: | 0 | | 0 | | 0 | | 1 | |
| # Perm. OOS: | 4 | | 0 | | 0 | | 0 | |
| Month: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: | Leaking: | Not Repaired in Repair Period: |
| July 2017 | 3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| August 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| September 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| October 2017 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| November 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| December 2017 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

**Delay of Repairs:**

No Delay of Repairs Performed.

**Late Repairs:**

No Late Repairs.

**Emergency Engine Records - IC Engine NESHAP Requirements (40 CFR 63 Subpart ZZZZ)** **Calendar Year:** 2017

**Facility Name:** Ignacio Gas Plant **Fuel Used:** Diesel

**Unit Description:** PU-2103A - 384 Hp Waukesha H866D Fire water Pump (Unit #25) **Date Constructed:** 1978

| Date | Hour Meter Readings | Operating Information - Emergency (No Operating Hours Limitation) | | Operating Information - Non Emergency 100 hrs per calendar year, includes 50 hrs of non-emergency use WARNINGS - Within 50% of limit, cells shaded yellow; Within 25%, cell shaded red | | | | Annual Hours Operated Emergency & Non-Emergency Complete Required Maintenance every 500 operated hours or annually |
|---|---|---|---|---|---|---|---|---|
| | Meter Value | # of Minutes | Reason for Emergency Operation | # of Minutes | Utilization Category - see below 1) maintenance/readiness testing 2) non-emergency use (50 hr limit) | Annual Hours Remaining (100 hr limit) | Non Emergency Hours Remaining (50 hr limit) | |
| 7/5/2017 | 110.8 | | | 30 | maintenance/readiness testing | 86.70 | 50.00 | 13.80 |
| 7/12/2017 | 111.3 | | | 30 | maintenance/readiness testing | 86.20 | 50.00 | 14.30 |
| 7/17/2017 | 111.8 | | | 30 | maintenance/readiness testing | 85.70 | 50.00 | 14.80 |
| 7/24/2017 | 112.3 | | | 30 | maintenance/readiness testing | 85.20 | 50.00 | 15.30 |
| 8/1/2017 | 112.8 | | | 30 | maintenance/readiness testing | 84.70 | 50.00 | 15.80 |
| 8/5/2017 | 113.3 | 30 | plant ESD | | | 84.70 | 50.00 | 16.30 |
| 8/9/2017 | 113.8 | | | 30 | maintenance/readiness testing | 84.20 | 50.00 | 16.80 |
| 8/14/2017 | 114.3 | | | 30 | maintenance/readiness testing | 83.70 | 50.00 | 17.30 |
| 8/24/2017 | 114.8 | | | 30 | maintenance/readiness testing | 83.20 | 50.00 | 17.80 |
| 8/28/2017 | 115.3 | | | 30 | maintenance/readiness testing | 82.70 | 50.00 | 18.30 |
| 9/5/2017 | 115.8 | | | 30 | maintenance/readiness testing | 82.20 | 50.00 | 18.80 |
| 9/11/2017 | 116.3 | | | 30 | maintenance/readiness testing | 81.70 | 50.00 | 19.30 |
| 9/18/2017 | 116.8 | | | 30 | maintenance/readiness testing | 81.20 | 50.00 | 19.80 |
| 9/25/2017 | 117.3 | | | 30 | maintenance/readiness testing | 80.70 | 50.00 | 20.30 |
| 10/2/2017 | 117.8 | | | 30 | maintenance/readiness testing | 80.20 | 50.00 | 20.80 |
| 10/3/2017 | 117.9 | | | 6 | maintenance/readiness testing | 80.10 | 50.00 | 20.90 |
| 10/3/2017 | 118.3 | | | 24 | maintenance/readiness testing | 79.70 | 50.00 | 21.30 |
| 10/3/2017 | 118.8 | | | 30 | maintenance/readiness testing | 79.20 | 50.00 | 21.80 |
| 10/4/2017 | 120.6 | | | 108 | maintenance/readiness testing | 77.40 | 50.00 | 23.60 |
| 10/10/2017 | 121.2 | | | 36 | maintenance/readiness testing | 76.80 | 50.00 | 24.20 |
| 10/11/2017 | 121.3 | | | 6 | non-emergency use | 76.70 | 49.90 | 24.30 |
| 10/17/2017 | 121.9 | | | 36 | maintenance/readiness testing | 76.10 | 49.90 | 24.90 |
| 10/23/2017 | 122.4 | | | 30 | maintenance/readiness testing | 75.60 | 49.90 | 25.40 |
| 10/27/2017 | 122.6 | 12 | Cooling Tower Deluge Tripped. | | | 75.60 | 49.90 | 25.60 |
| 10/30/2017 | 123.2 | | | 36 | maintenance/readiness testing | 75.00 | 49.90 | 26.20 |

## Emergency Engine Records - IC Engine NESHAP Requirements (40 CFR 63 Subpart ZZZZ)

**Calendar Year:** 2017

**Facility Name:** Ignacio Gas Plant

**Fuel Used:** Diesel

**Unit Description:** PU-2103A - 384 Hp Waukesha H866D Fire water Pump (Unit #25)

**Date Constructed:** 1978

| Date | Hour Meter Readings | Operating Information - Emergency (No Operating Hours Limitation) | | Operating Information - Non Emergency 100 hrs per calendar year, includes 50 hrs of non-emergency use WARNINGS - Within 50% of limit, cells shaded yellow; Within 25%, cell shaded re | | | | Annual Hours Operated Emergency & Non-Emergency Complete Required Maintenance every 500 operated hours or annually |
|---|---|---|---|---|---|---|---|---|
| | Meter Value | # of Minutes | Reason for Emergency Operation | # of Minutes | Utilization Category - see below 1) maintenance/readiness testing 2) non-emergency use (50 hr limit) | Annual Hours Remaining (100 hr limit) | Non Emergency Hours Remaining (50 hr limit) | |
| 11/6/2017 | 123.7 | | | 30 | maintenance/readiness testing | 74.50 | 49.90 | 26.70 |
| 11/13/2017 | 124.2 | | | 30 | maintenance/readiness testing | 74.00 | 49.90 | 27.20 |
| 11/20/2017 | 124.7 | | | 30 | maintenance/readiness testing | 73.50 | 49.90 | 27.70 |
| 11/23/2017 | | 18 | Cooling Tower Deluge Tripped. | | | 73.50 | 49.90 | 28.00 |
| 11/27/2017 | 125.6 | | | 36 | maintenance/readiness testing | 72.90 | 49.90 | 28.60 |
| 12/7/2017 | 126.1 | | | 30 | maintenance/readiness testing | 72.40 | 49.90 | 29.10 |
| 12/13/2017 | 126.6 | | | 30 | maintenance/readiness testing | 71.90 | 49.90 | 29.60 |
| 12/18/2017 | 127.1 | | | 30 | maintenance/readiness testing | 71.40 | 49.90 | 30.10 |
| 12/27/2017 | 127.6 | | | 30 | maintenance/readiness testing | 70.90 | 49.90 | 30.60 |

**Emergency Engine Records - IC Engine NESHAP Requirements (40 CFR 63 Subpart ZZZZ)** **Calendar Year:** 2017

**Facility Name:** Ignacio Gas Plant **Fuel Used:** Diesel

**Unit Description:** PU-3109 - 305 Hp Caterpillar 4W-3798 Fire water Pump (Unit #26) **Date Constructed:** 1985

| Date | Hour Meter Readings | Operating Information - Emergency (No Operating Hours Limitation) | | Operating Information - Non Emergency 100 hrs per calendar year, includes 50 hrs of non-emergency use WARNINGS - Within 50% of limit, cells shaded yellow; Within 25%, cell shaded red | | | | Annual Hours Operated Emergency & Non-Emergency Complete Required Maintenance every 500 operated hours or annually |
|---|---|---|---|---|---|---|---|---|
| | Meter Value | # of Minutes | Reason for Emergency Operation | # of Minutes | Utilization Category - see below 1) maintenance/readiness testing 2) non-emergency use (50 hr limit) | Annual Hours Remaining (100 hr limit) | Non Emergency Hours Remaining (50 hr limit) | |
| 7/5/2017 | 109.4 | | | 30 | maintenance/readiness testing | 87.00 | 50.00 | 13.10 |
| 7/12/2017 | 109.9 | | | 30 | maintenance/readiness testing | 86.50 | 50.00 | 13.60 |
| 7/17/2017 | 110.4 | | | 30 | maintenance/readiness testing | 86.00 | 50.00 | 14.10 |
| 7/24/2017 | 111 | | | 36 | maintenance/readiness testing | 85.40 | 50.00 | 14.70 |
| 8/1/2017 | 111.5 | | | 30 | maintenance/readiness testing | 84.90 | 50.00 | 15.20 |
| 8/5/2017 | 113.2 | 72 | plant ESD | | | 84.90 | 50.00 | 16.40 |
| 8/9/2017 | 113.7 | | | 30 | maintenance/readiness testing | 84.40 | 50.00 | 16.90 |
| 8/14/2017 | 114.2 | | | 30 | maintenance/readiness testing | 83.90 | 50.00 | 17.40 |
| 8/24/2017 | 114.7 | | | 30 | maintenance/readiness testing | 83.40 | 50.00 | 17.90 |
| 8/28/2017 | 115.2 | | | 30 | maintenance/readiness testing | 82.90 | 50.00 | 18.40 |
| 9/5/2017 | 115.7 | | | 30 | maintenance/readiness testing | 82.40 | 50.00 | 18.90 |
| 9/11/2017 | 116.2 | | | 30 | maintenance/readiness testing | 81.90 | 50.00 | 19.40 |
| 9/18/2017 | 116.7 | | | 30 | maintenance/readiness testing | 81.40 | 50.00 | 19.90 |
| 9/25/2017 | 117.2 | | | 30 | maintenance/readiness testing | 80.90 | 50.00 | 20.40 |
| 10/2/2017 | 117.7 | | | 30 | maintenance/readiness testing | 80.40 | 50.00 | 20.90 |
| 10/3/2017 | 117.8 | | | 6 | maintenance/readiness testing | 80.30 | 50.00 | 21.00 |
| 10/3/2017 | 118.2 | | | 24 | maintenance/readiness testing | 79.90 | 50.00 | 21.40 |
| 10/3/2017 | 118.6 | | | 24 | maintenance/readiness testing | 79.50 | 50.00 | 21.80 |
| 10/4/2017 | 119.2 | | | 36 | maintenance/readiness testing | 78.90 | 50.00 | 22.40 |
| 10/10/2017 | 119.7 | | | 30 | maintenance/readiness testing | 78.40 | 50.00 | 22.90 |
| 10/13/2017 | 119.9 | | | 12 | non-emergency use | 78.20 | 49.80 | 23.10 |
| 10/17/2017 | 120.4 | | | 30 | maintenance/readiness testing | 77.70 | 49.80 | 23.60 |
| 10/23/2017 | 120.9 | | | 30 | maintenance/readiness testing | 77.20 | 49.80 | 24.10 |

**Emergency Engine Records - IC Engine NESHAP Requirements (40 CFR 63 Subpart ZZZZ)**

**Calendar Year:** 2017

**Facility Name:** Ignacio Gas Plant

**Fuel Used:** Diesel

**Unit Description:** PU-3109 - 305 Hp Caterpillar 4W-3798 Fire water Pump (Unit #26)

**Date Constructed:** 1985

| Date | Hour Meter Readings | Operating Information - Emergency (No Operating Hours Limitation) | | Operating Information - Non Emergency 100 hrs per calendar year, includes 50 hrs of non-emergency use WARNINGS - Within 50% of limit, cells shaded yellow; Within 25%, cell shaded red | | | | Annual Hours Operated Emergency & Non-Emergency Complete Required Maintenance every 500 operated hours or annually |
|---|---|---|---|---|---|---|---|---|
| | Meter Value | # of Minutes | Reason for Emergency Operation | # of Minutes | Utilization Category - see below 1) maintenance/readiness testing 2) non-emergency use (50 hr limit) | Annual Hours Remaining (100 hr limit) | Non Emergency Hours Remaining (50 hr limit) | |
| 10/27/2017 | 121 | 6 | Cooling Tower Deluge Tripped | | | 77.20 | 49.80 | 24.20 |
| 10/30/2017 | 121.5 | | | 30 | maintenance/readiness testing | 76.70 | 49.80 | 24.70 |
| 11/6/2017 | 122 | | | 30 | maintenance/readiness testing | 76.20 | 49.80 | 25.20 |
| 11/13/2017 | 122.5 | | | 30 | maintenance/readiness testing | 75.70 | 49.80 | 25.70 |
| 11/20/2017 | 123 | | | 30 | maintenance/readiness testing | 75.20 | 49.80 | 26.20 |
| 11/23/2017 | 123.3 | 18 | Cooling Tower Deluge Tripped | | | 75.20 | 49.80 | 26.50 |
| 11/27/2017 | 123.8 | | | 30 | maintenance/readiness testing | 74.70 | 49.80 | 27.00 |
| 12/7/2017 | 124.3 | | | 30 | maintenance/readiness testing | 74.20 | 49.80 | 27.50 |
| 12/13/2017 | 124.8 | | | 30 | maintenance/readiness testing | 73.70 | 49.80 | 28.00 |
| 12/18/2017 | 125.3 | | | 30 | maintenance/readiness testing | 73.20 | 49.80 | 28.50 |
| 12/27/2018 | 125.8 | | | 30 | maintenance/readiness testing | 72.70 | 49.80 | 29.00 |

**Attachment E**

Unit No: **Amine Treatment System**

EU No. **17**

Condition III 4.2.4 - equipment leaks limited to 0.72 tpy VOC

| | Original Equipment Count | | | | | |
|---|---|---|---|---|---|---|
| | Valves | Connectors | Pump Seals | Compressor Seals | PRVs | Open-end |
| Gas | 110 | 118 | 0 | 0 | 7 | 30 |
| Glycol, Amine, Aqueous | 499 | 341 | 16 | 0 | 7 | 182 |
| Condensate | 18 | 7 | 0 | 0 | 0 | 3 |

| Component additions/ deletions | | Monthly Emissions, tons | Emissions baseline 12-month Rolling Total, tons | 0.72 | tpy |
|---|---|---|---|---|---|
| Jul-17 | no modifications | 0.0592 | 0.7100 | | |
| Aug-17 | no modifications | 0.0592 | 0.7100 | | |
| Sep-17 | no modifications | 0.0592 | 0.7100 | | |
| Oct-17 | no modifications | 0.0592 | 0.7100 | | |
| Nov-17 | no modifications | 0.0592 | 0.7100 | | |
| Dec-17 | MOCR 17-066, added (3) 1/4" valves | 0.0592 | 0.7100 | | |

**Attachment F**

Unit: **17 - Amine Plant**

Condition III.4.2.5

| | natural gas throughput | | amine circ rate: 2500 |
|---|---|---|---|
| permit limit => | 15,208 | 182,500 | |
| DATE (mm/yy) | throughput (mmcf/mo) | throughput (mmcf/calendar yr) | RATE (gpm) |
| Jul-17 | 11038 | 124,291 | 1574.9 |
| Aug-17 | 11430.4 | 124,447 | 1604.9 |
| Sep-17 | 10893.8 | 124,422 | 1616.9 |
| Oct-17 | 10887.3 | 124,112 | 1528.6 |
| Nov-17 | 10709.0 | 124,323 | 1578.5 |
| Dec-17 | 10663.0 | 124,635 | 1546.3 |

**Attachment G**

Unit: **15 - West Dehydrator**

Condition III.4.4.3

| | | VOC | | Annual VOC emissions from GLYCalc analysis | | |
|---|---|---|---|---|---|---|
| permit limit => | | | 6.7 | | | |
| DATE (mm/yy) | Hours of Operation | FACTOR[1] (lb/hr) | RATE (tpy) | Gas analysis | GLYCalc filename | GLYCalc run date |
| Jul-17 | 744 | 0.44 | 2.44 | | | |
| Aug-17 | 738 | 0.44 | 2.44 | | | |
| Sep-17 | 720 | 0.44 | 2.44 | | | |
| Oct-17 | 744 | 0.32 | 2.40 | 8/29/2017 | Ign West Dehy 10-2017 | 10/17/2017 |
| Nov-17 | 720 | 0.32 | 2.35 | | | |
| Dec-17 | 744 | 0.32 | 2.31 | | | |

GRI-GLYCalc VERSION 4.0 - SUMMARY OF INPUT VALUES

Case Name: West Dehy 2017
File Name: W:\0EnvironmentalCompliance\Facilities\MOA\Ignacio Plant\Dehy GlyCalc Runs\2017\West Dehy 9-17.ddf
Date: October 17, 2017

DESCRIPTION:
---

Description: 9/14/17 ext gas analysis and operating parameters

Annual Hours of Operation: 8760.0 hours/yr

WET GAS:
---

Temperature: 97.00 deg. F
Pressure: 760.00 psig
Wet Gas Water Content: Saturated

| Component | Conc. (vol %) |
|---|---|
| Carbon Dioxide | 0.1160 |
| Nitrogen | 0.8750 |
| Methane | 85.8180 |
| Ethane | 6.5960 |
| Propane | 3.3210 |
| Isobutane | 0.5720 |
| n-Butane | 0.9870 |
| Isopentane | 0.3350 |
| n-Pentane | 0.2670 |
| n-Hexane | 0.1260 |
| Cyclohexane | 0.0690 |
| Other Hexanes | 0.0320 |
| Heptanes | 0.2800 |
| Benzene | 0.0210 |
| Toluene | 0.0500 |
| Ethylbenzene | 0.0030 |
| Xylenes | 0.0300 |
| C8+ Heavies | 0.5000 |

DRY GAS:
---

Flow Rate: 344.0 MMSCF/day
Water Content: 3.0 lbs. H2O/MMSCF

LEAN GLYCOL:
---

Glycol Type: TEG
Water Content: 1.5 wt% H2O
Flow Rate: 26.0 gpm

PUMP:
---

Glycol Pump Type: Electric/Pneumatic

FLASH TANK:

---

Flash Control: Recycle/recompression
Temperature: 95.0 deg. F
Pressure: 84.0 psig

REGENERATOR OVERHEADS CONTROL DEVICE:

---

Control Device: Condenser
Temperature: 90.0 deg. F
Pressure: 12.0 psia

Control Device: Combustion Device
Destruction Efficiency: 98.0 %
Excess Oxygen: 25.0 %
Ambient Air Temperature: 68.0 deg. F

GRI-GLYCalc VERSION 4.0 - EMISSIONS SUMMARY

Case Name: West Dehy 2017
File Name: W:\0EnvironmentalCompliance\Facilities\MOA\Ignacio Plant\Dehy GlyCalc Runs\2017\West Dehy 9-17.ddf
Date: October 17, 2017

CONTROLLED REGENERATOR EMISSIONS

| Component | lbs/hr | lbs/day | tons/yr |
|---|---|---|---|
| Methane | 0.0861 | 2.067 | 0.3773 |
| Ethane | 0.0937 | 2.248 | 0.4102 |
| Propane | 0.1307 | 3.136 | 0.5723 |
| Isobutane | 0.0322 | 0.774 | 0.1412 |
| n-Butane | 0.0639 | 1.533 | 0.2798 |
| Isopentane | 0.0128 | 0.306 | 0.0559 |
| n-Pentane | 0.0127 | 0.306 | 0.0558 |
| n-Hexane | 0.0047 | 0.113 | 0.0207 |
| Cyclohexane | 0.0081 | 0.194 | 0.0355 |
| Other Hexanes | 0.0012 | 0.029 | 0.0052 |
| Heptanes | 0.0080 | 0.192 | 0.0350 |
| Benzene | 0.0173 | 0.415 | 0.0757 |
| Toluene | 0.0210 | 0.505 | 0.0922 |
| Ethylbenzene | 0.0006 | 0.015 | 0.0028 |
| Xylenes | 0.0080 | 0.192 | 0.0350 |
| C8+ Heavies | 0.0003 | 0.008 | 0.0014 |
| Total Emissions | 0.5014 | 12.033 | 2.1960 |
| Total Hydrocarbon Emissions | 0.5014 | 12.033 | 2.1960 |
| Total VOC Emissions | 0.3216 | 7.718 | 1.4085 |
| Total HAP Emissions | 0.0517 | 1.241 | 0.2264 |
| Total BTEX Emissions | 0.0470 | 1.127 | 0.2057 |

UNCONTROLLED REGENERATOR EMISSIONS

| Component | lbs/hr | lbs/day | tons/yr |
|---|---|---|---|
| Methane | 4.4077 | 105.785 | 19.3057 |
| Ethane | 5.3161 | 127.587 | 23.2847 |
| Propane | 11.5081 | 276.193 | 50.4053 |
| Isobutane | 4.2205 | 101.293 | 18.4860 |
| n-Butane | 10.4757 | 251.418 | 45.8838 |
| Isopentane | 4.7334 | 113.601 | 20.7321 |
| n-Pentane | 4.9535 | 118.885 | 21.6965 |
| n-Hexane | 4.9452 | 118.685 | 21.6601 |
| Cyclohexane | 12.2141 | 293.138 | 53.4976 |
| Other Hexanes | 0.9334 | 22.401 | 4.0881 |
| Heptanes | 24.0693 | 577.664 | 105.4237 |
| Benzene | 31.3757 | 753.016 | 137.4254 |
| Toluene | 127.1122 | 3050.694 | 556.7516 |
| Ethylbenzene | 11.9593 | 287.024 | 52.3818 |
| Xylenes | 173.2240 | 4157.376 | 758.7212 |
| C8+ Heavies | 272.1095 | 6530.629 | 1191.8397 |
| Total Emissions | 703.5578 | 16885.388 | 3081.5833 |
| Total Hydrocarbon Emissions | 703.5578 | 16885.388 | 3081.5833 |
| Total VOC Emissions | 693.8340 | 16652.016 | 3038.9929 |

| | | | |
|---|---|---|---|
| Total HAP Emissions | 348.6165 | 8366.795 | 1526.9401 |
| Total BTEX Emissions | 343.6712 | 8248.110 | 1505.2800 |

FLASH GAS EMISSIONS

Note: Flash Gas Emissions are zero with the Recycle/recompression control option.

FLASH TANK OFF GAS

| Component | lbs/hr | lbs/day | tons/yr |
|---|---|---|---|
| Methane | 33.8137 | 811.529 | 148.1040 |
| Ethane | 10.9806 | 263.535 | 48.0952 |
| Propane | 9.0640 | 217.535 | 39.7002 |
| Isobutane | 2.0978 | 50.347 | 9.1884 |
| n-Butane | 3.8146 | 91.550 | 16.7078 |
| Isopentane | 1.3809 | 33.141 | 6.0483 |
| n-Pentane | 1.1652 | 27.964 | 5.1035 |
| n-Hexane | 0.5993 | 14.383 | 2.6248 |
| Cyclohexane | 0.4080 | 9.792 | 1.7871 |
| Other Hexanes | 0.1523 | 3.655 | 0.6671 |
| Heptanes | 1.3673 | 32.815 | 5.9888 |
| Benzene | 0.1229 | 2.950 | 0.5384 |
| Toluene | 0.2984 | 7.162 | 1.3070 |
| Ethylbenzene | 0.0150 | 0.359 | 0.0655 |
| Xylenes | 0.1399 | 3.358 | 0.6128 |
| C8+ Heavies | 1.5134 | 36.321 | 6.6287 |
| Total Emissions | 66.9333 | 1606.398 | 293.1676 |
| Total Hydrocarbon Emissions | 66.9333 | 1606.398 | 293.1676 |
| Total VOC Emissions | 22.1389 | 531.334 | 96.9684 |
| Total HAP Emissions | 1.1755 | 28.211 | 5.1485 |
| Total BTEX Emissions | 0.5762 | 13.829 | 2.5237 |

**Attachment I**

Unit No: **Thermal Oxidizer**
EU No. **22**
Meter 12491-01
Condition III.4.5.2

| | | NOx | | CO | | VOC | | SO2 | | supplemental fuel use |
|---|---|---|---|---|---|---|---|---|---|---|
| permit limit => | | | 38.52 | | 23.45 | | 5.10 | | 7.80 | 55 |
| DATE (mm/yy) | Hours of Operation | FACTOR (lb/hr) | RATE (tpy) | FACTOR (lb/hr) | RATE (tpy) | FACTOR (lb/hr) | RATE (tpy) | FACTOR (lb/hr) | RATE (tpy) | Average Fuel Use (MMBtu/hr) |
| | | 4.78 | | 0.36 | | 0.08 | | 1.34 | | |
| Jul-17 | 744 | | 20.75 | | 1.56 | | 1.36 | | 5.82 | 27.30 |
| Aug-17 | 736.6 | | 20.74 | | 1.56 | | 1.36 | | 5.81 | 27.80 |
| Sep-17 | 720 | | 20.75 | | 1.56 | | 1.36 | | 5.82 | 30.80 |
| Oct-17 | 744 | | 20.75 | | 1.56 | | 1.36 | | 5.82 | 27.60 |
| Nov-17 | 720 | | 20.75 | | 1.56 | | 1.36 | | 5.82 | 30.02 |
| Dec-17 | 744 | | 20.76 | | 1.56 | | 1.37 | | 5.82 | 29.50 |

**Attachment J**
**Ignacio Gas Plant Part 64 Compliance Assurance Monitoring (CAM) Plan Excursion Monitoring**

An excursion is defined as *any loss of flare flame*

No more than six excursions may occur in any semiannual reporting period.

Reporting Period July 1, 2017 to December 31, 2017
Emission Unit Flare

| | |
|---|---|
| **Event Date** | 11/14/17 |
| **Event Summary** | Flare pilot extinguished |
| **Response to Event** | Pilot manually re-ignited |
| **Qualifies as Excursion?** | Yes |
| **Justification for Determination** | No presence of pilot |

| | |
|---|---|
| **Event Date** | 12/22/17 |
| **Event Summary** | Flare pilot extinguished |
| **Response to Event** | Pilot manually re-ignited |
| **Qualifies as Excursion?** | Yes |
| **Justification for Determination** | No presence of pilot |

**Attachment J**

**Ignacio Gas Plant Part 64 Compliance Assurance Monitoring (CAM) Plan Excursion Monitoring**

An excursion is defined as *any occurrence in which the waste gas flow to the thermal oxidizer is diverted through a bypass line* and vented to the atmosphere.

The diversion of wasted gas through a bypass valve to the atmosphere when necessary **to maintain a safe work environment due to upset conditions** is not considered an excursion for this indicator.

No more than two excursions may occur in any semiannual reporting period.

Reporting Period July 1, 2017 to December 31, 2017

Emission Unit Thermal Oxidizer

| | |
|---|---|
| **Event Date** | 8/6/17 |
| **Event Summary** | Power outage on the grid knocked plant down. Orginally thought no vent to atmosphere occurred during event. Review of operational data indicate that the dehy was being routed to atmosphere from 1:32 am until 5:11 am. |
| **Response to Event** | Operations brought the plant back on-line ASAP. Dehy routed to thermal oxidizer upon discovery of vent to atmosphere |
| **Qualifies as Excursion?** | Yes |
| **Justification for Determination** | Stream should have been routed to TO during event |