



MICHELLE LUJAN GRISHAM  
GOVERNOR

JAMES C. KENNEY  
CABINET SECRETARY

**Air Quality Bureau**  
**NOTICE OF VIOLATION**

<b>TRACKING NUMBER:</b>	ETC-0569-2201 and ETC-0569-2301	<b>ICIS ENFORCEMENT ACTION ID:</b>	NM000A87904
<b>COMPANY NAME:</b>	ETC Texas Pipeline LTD	<b>FACILITY NAME:</b>	Jal #3 Gas Plant
<b>PERMIT(S):</b>	Title V Permit P090-R3 and New Source Review (NSR) Permits 1092-M8 to 1092-M10	<b>SOURCE CLASS:</b>	Major (Title V), PSD Major
<b>INSPECTION DATE:</b>	July 13-19, 2022 & July 10, 2023	<b>EARLIEST DISCOVERY:</b>	August 5, 2021
<b>SELF-REPORTED:</b>	No	<b>*NRV, FRV OR HPV:</b>	HPV
<b>FACILITY LOCATION:</b>	4 Miles NNE of Jal	<b>COUNTY:</b>	Lea County
<b>MAILING ADDRESS:</b>	ETC Texas Pipeline LTD 8111 Westchester Dr Suite 600 Dallas, TX 75225	<b>CONTACT PERSON:</b>	Alena Miro, <a href="mailto:alena.miro@energytransfer.com">alena.miro@energytransfer.com</a> , 713-865-6825
<b>AGENCY INTEREST:</b>	AI # 0569	<b>AQB AIRS #:</b>	350250008

This Notice of Violation is a written record of the AIR QUALITY BUREAU'S ("Bureau") finding that a violation of AIR QUALITY CONTROL REGULATIONS OR AIR QUALITY PERMIT CONDITIONS has occurred. A Notice is issued each time a violation is observed or discovered. This Notice may subject you to monetary penalties through administrative, civil, or criminal prosecution.

Each violation set forth in this NOV has been evaluated in accordance with EPA's Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources (September 2014) and Timely and Appropriate Enforcement Response to High Priority Violations (August 2014). The overall assessment of this enforcement case reflects the highest level determined. This case is determined to be a High Priority Violation (HPV).

If you have questions or believe any statement in this notice is erroneous, please contact Charles Butler, Enforcement Specialist, at (505) 660-6110 or [charles.butler@env.nm.gov](mailto:charles.butler@env.nm.gov) or Teresa McDill, Enforcement Manager, at (505) 629-8732 or [teresa.mcdill@env.nm.gov](mailto:teresa.mcdill@env.nm.gov). If you are represented by counsel, please contact Christopher Westenberger, Assistant General Counsel, at (505) 469-8862 or [christopher.westenberger@env.nm.gov](mailto:christopher.westenberger@env.nm.gov).

\_\_\_\_\_  
Air Quality Bureau Official

\_\_\_\_\_  
Date

<b>Company:</b>	ETC Texas Pipeline LTD	<b>Inspection By:</b>	Linsey Hurst and Maxwell Schechter
<b>Facility:</b>	Jal #3 Gas Plant	<b>Date of Discovery:</b>	August 5, 2021
<b>NOV #:</b>	ETC-0569-2201 and ETC-0569-2301	<b>NOV Prepared By:</b>	Charles Butler
<b>Permit #:</b>	Title V Permit P090-R3 and New Source Review (NSR) Permits 1092-M8 to 1092-M10	<b>NRV, FRV or HPV:</b>	HPV

**VIOLATION 1:** Title V Permit P090-R3, Specific Condition A106 - *Facility: Allowable Emissions*

**Number of Claims:** 1220

**Requirement:**

Title V Permit P090-R3, Specific Condition A106 - *Facility: Allowable Emissions* states in relevant part, "The following Section lists the emission units, and their allowable emission limits. (40 CFR 50, 40 CFR 60, Subparts A, Db, and JJJ, 40 CFR 63, Subparts A and ZZZZ, 40 CFR 64 CAM, 20.2.33 NMAC, 20.2.35 NMAC, 20.2.61 NMAC, and 20.2.72.210.A and B.1 NMAC and NSR Permits 1092-M8 & M8R2)."

According to the Excess Emission Reports (EERs), the two pieces of equipment responsible for the excess emissions are units 9F, a treatment flare, and 10F, an inlet flare. Their limits can be found in Attachment 1 on the Allowable Emissions Table 106.A, which is reproduced from the permit.

**Description:**

ETC Texas Pipeline LTD failed to meet permitted allowable emissions at their Jal #3 Gas Plant as laid out in their Title V permit, P090-R3 (see Attachment #1). ETC submitted one hundred and seventeen (117) excess emissions reports (EER) between August 1, 2021, and July 10 2023. The excess emissions were released from Units 9F and 10F. Attachment 2 outlines the emissions from the EER, including the activity numbers of the emissions along with the duration and the amounts of pollutants.

ETC submitted twelve (12) Affirmative Defense Demonstrations (ADDs) for EERs filed during this review period. Eleven (11) ADDs were rejected for failing to meet the requirements of 20.2.7 NMAC. EER data is summarized in Attachment 2 - Malfunction Excess Emission Event Duration, Excess Emissions, and Number of Hourly Exceedances. One ADD was accepted and not included in the penalty calculations. Please see Attachment 3 for ADD analysis.

After accepting the one ADD, the total amount of excess emissions was adjusted downward. The total excess emissions for regulated pollutants reported are now 16,722.27 pounds of carbon monoxide (CO), 4,177.19 pounds of nitrogen dioxide (NO<sub>x</sub>), 75,551.96 pounds of sulfur dioxide (SO<sub>x</sub>), 9,928.69 pounds of volatile organic compounds (VOC), and 222.50 pounds of hydrogen sulfide (H<sub>2</sub>S).

The number of claims represents the number of hours, per pollutant, the Facility exceeded allowable pounds per hour limits. Penalties will be assessed based on the pounds emitted.

**Conclusion:**

The failure of ETC Texas Pipeline LTD to meet permitted allowable emission is in violation of TV Permit P090-R3 Specific Condition A106. The number of claims represents the sum of all hours exceeding the permitted emission rates for each regulated pollutant.

**Additional Information Required:**

ETC Texas Pipeline LTD shall provide a report to the Bureau within 30 days of receipt of this Notice of Violation, detailing the following:

1. Description of the cause(s) of this violation;
2. Documentation of the steps taken to correct the violation to date;
3. Documentation of steps taken (or description of steps to be taken) to prevent the recurrence of this violation;
4. Gas Flow Rates to Treatment Flare (9F) and Inlet Flare (10F) for date range: January 1, 2023, to July 31, 2023; and
5. Emission calculations for NOX, CO, VOC, SO<sub>2</sub> and H<sub>2</sub>S for date range: January 1, 2023, to July 31, 2023. Provide the data in editable excel format and pdf format, and make sure formulas are visible in the excel document.

<b>Company:</b>	ETC Texas Pipeline LTD	<b>Inspection By:</b>	Linsey Hurst
<b>Facility:</b>	Jal #3 Gas Plant	<b>Date of Discovery:</b>	August 5, 2021
<b>NOV #:</b>	ETC-0569-2201 and ETC-0569-2301	<b>NOV Prepared By:</b>	Charles Butler
<b>Permit #:</b>	Title V Permit P090-R3 and New Source Review (NSR) Permits 1092-M8 to 1092-M10	<b>NRV, FRV or HPV:</b>	FRV

**VIOLATION 2:** 20.2.7.110.A NMAC *Excess Emissions*

**Number of Claims:** 2

**Requirement:**

20.2.7.110.A NMAC *Excess Emissions*, states in relevant part “(2) Initial report: the owner or operator shall file an initial report, no later than the end of the next regular business day after the time of discovery of an excess emission that includes all available information for each item in Subsection B of 20.2.7.110 NMAC.”

**Description:**

ETC Texas Pipeline LTD at the Jal #3 Gas Plant failed to submit two (2) Initial EERs within the defined regulatory timelines in 20.2.7.110.A NMAC. Initial EERs for EER # 000569-02072022-01 and 000569-02082023-01 were due on February 4, 2022, and January 30, 2023, respectively. AQB received EER # 000569-02072022-01 on February 7, 2022, which is three (3) days late and received EER # 000569-02082023- on February 8, 2023, which is seven (7) days late. Both were submitted electronically via the Air Quality Bureau Compliance Reporting (AQBCR) application.

**Conclusion:**

The failure of ETC Texas Pipeline LTD to submit two timely Initial Excess Emissions Reports is in violation of 20.2.7.110.A NMAC.

**Additional Information Required:**

ETC Texas Pipeline LTD shall provide a report to the Bureau within 30 days of receipt of this Notice of Violation, detailing the following:

1. Description of the cause(s) of this violation;
2. Documentation of the steps taken to correct the violation to date; and
3. Documentation of steps taken (or description of steps to be taken) to prevent recurrence of this violation.

**ADDITIONAL INFORMATION VERIFICATION AND REPORT**

This form must be completed and signed by the facility’s Responsible Official (Title V) or other designee and returned within 30 days of the receipt of the Notice of Violation. All additional information must be submitted according to each violation’s instructions. Documentation for additional information (in addition to this form) must be submitted electronically no later than the dates specified for each violation to Enforcement Specialist Charles Butler at [charles.butler@env.nm.gov](mailto:charles.butler@env.nm.gov) or Enforcement Manager Teresa McDill at [teresa.mcdill@env.nm.gov](mailto:teresa.mcdill@env.nm.gov).

All submittals must be submitted using the Reporting Submittal Form. The form and instructions can be located at: <https://www.env.nm.gov/air-quality/compliance-and-enforcement/#>.

Please note that your facility now appears on the Department’s Enforcement Watch as a result of this NOV (see: <https://www.env.nm.gov/enforcement-watch/>). Further the Department will issue a press release to local media highlighting your facility as appearing on this webpage. Your facility will remain on the Enforcement Watch website as an active matter until this matter is fully resolved, including the payment of the assessed civil penalty.

*I hereby verify that ETC Texas Pipeline LTD has initiated the required additional information response outlined in this Notice of Violation. The following information has been submitted or will be submitted by the dates indicated below for each violation. All required documentation will be submitted electronically within 30 days of the receipt of the Notice of Violation.*

Date NOV received: \_\_\_\_\_

*Alleged Violation 1*

\_\_\_\_\_ *A description of the cause of the violation*

\_\_\_\_\_ *Documentation of the steps taken to correct the violation to date.*

\_\_\_\_\_ *The gas flow rates the equipment requested*

\_\_\_\_\_ *The emission calculations requested from January 1<sup>st</sup>, 2023, to July 31<sup>st</sup>, 2023.*

*Alleged Violation 2*

\_\_\_\_\_ *The cause of the violation*

\_\_\_\_\_ *Documentation of the steps taken to correct the violation to date*

\_\_\_\_\_ *Documentation of steps taken (or to be taken) to prevent recurrence of this violation*

\_\_\_\_\_

**Signature**

\_\_\_\_\_

**Date**

Printed Name:

Title:

**ETC-569-2201 NOV Attachment #1 Allowable Emissions**

Title V Permit P090-R3, A106 Facility: Allowable Emissions

**Table 106.A: Allowable Emissions**

Unit No.	<sup>1</sup> NO <sub>x</sub> pph	NO <sub>x</sub> tpy	CO pph	CO tpy	VOC pph	VOC tpy	SO <sub>2</sub> pph	SO <sub>2</sub> tpy	PM <sub>10</sub> / PM <sub>2.5</sub> pph	PM <sub>10</sub> / PM <sub>2.5</sub> tpy
1A	4.9	21.2	6.1	26.6	2.4	10.6	<	<	<	1.6
2A	4.9	21.2	6.1	26.6	2.4	10.6	<	<	<	1.6
3A	4.9	21.2	6.1	26.6	2.4	10.6	<	<	<	1.6
4A	27.9	122.0	11.4	50.1	1.2	5.2	<	<	<	1.6
5A	27.9	122.0	11.4	50.1	1.2	5.2	<	<	<	1.6
C1	3.9	17.1	2.1	9.4	1.7	7.7	<	1.7	<	1.2
C2	3.9	17.1	2.1	9.4	1.7	7.7	<	1.7	<	1.2
C3	3.9	17.1	2.1	9.4	1.7	7.7	<	1.7	<	1.2
C4	3.9	17.1	2.1	9.4	1.7	7.7	<	1.7	<	1.2
S1	8.8	39.0	3.0	13.1	3.5	15.5	<	1.4	<	3.6
S2	8.8	39.0	3.0	13.1	3.5	15.5	<	1.4	<	3.6
S3	8.8	39.0	3.0	13.1	3.5	15.5	<	1.4	<	3.6
S4	8.8	39.0	3.0	13.1	3.5	15.5	<	1.4	<	3.6
S5	8.3	36.2	2.1	9.3	1.3	5.8	<	1.0	<	2.7
7H	< <sup>2</sup>	2.4	<	2.0	<	<	<	<	<	<
9S	3.5	15.4	146.6	642.3	1.1	4.8	275.3	1205.9	<	<
11H	<	3.3	<	2.8	<	<	<	<	<	<
31B	3.3	14.3	3.4	14.7	<	4.0	1.3	5.7	<	4.0
32B	4.7	20.6	10.0	43.6	<	2.9	1.7	7.4	<	3.9
8F	0.05	0.22	0.04	0.18	0.0	0.1	<	<	<	<
9F	0.25	1.1	2.0	8.8	2.2	9.5	<	<	<	<
10F	0.08	0.33	0.06	0.28	0.0	0.1	<	<	<	<
TK 3	-	-	-	-	*	<	-	-	-	-

**Table 106.A: Allowable Emissions**

Unit No.	<sup>1</sup> NO <sub>x</sub> pph	NO <sub>x</sub> tpy	CO pph	CO tpy	VOC pph	VOC tpy	SO <sub>2</sub> pph	SO <sub>2</sub> tpy	PM <sub>10</sub> / PM <sub>2.5</sub> pph	PM <sub>10</sub> / PM <sub>2.5</sub> tpy
TK 4	-	-	-	-	*	<	-	-	-	-
TK 46	-	-	-	-	*	0.2	-	-	-	-
TK-519					*	0.0027				
TK-519C					*	0.089				
TK-519A					*	0.00007				
LOAD					*	<				
FUG1	-	-	-	-	*	34.8 <sup>3</sup>	-	-	-	-
FUG2	-	-	-	-	*	0.6 <sup>3</sup>	-	-	-	-
Loadout	-	-	-	-	<	6.4	-	-	-	-

- 1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO<sub>2</sub>.
  - 2 Title V annual fee assessments are based on the sum of allowable tons per year emission limits in Sections A106 and A107.
  - 3 FUG1 emissions are vented to Flares 8F or 10F; FUG2 emissions are vented to Flare 9F.
  - 4 Compliance with emergency flare emission limits is demonstrated by limiting combustion to pilot and/or purge gas only.
  - 5 To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110.E.
- <sup>“-”</sup> indicates the application represented emissions are not expected for this pollutant.
- <sup>“<”</sup> indicates that the application represented the uncontrolled mass emission rates are less than 1.0 pph or 1.0 tpy for this emissions unit and this air pollutant. The Department determined that allowable mass emission limits were not required for this unit and this pollutant.
- <sup>“\*”</sup> indicates hourly emission limits are not appropriate for this operating situation.

**General Condition B110.E: Allowable Emission Limits for Excess Emissions Reporting for Flares and Other Regulated Sources with No Pound per Hour (pph) and/or Ton per Year (tpy) Emission Limits**

<p>E. Allowable Emission Limits for Excess Emissions Reporting for Flares and Other Regulated Sources with No Pound per Hour (pph) and/or Ton per Year (tpy) Emission Limits.</p> <ol style="list-style-type: none"> <li>(1) When a flare has no allowable pph and/or tpy emission limits in Sections A106 and/or A107, the authorized allowable emissions include only the combustion of pilot and/or purge gas. Compliance is demonstrated by limiting the gas stream to the flare to only pilot and/or purge gas.</li> <li>(2) For excess emissions reporting as required by 20.2.7 NMAC, the allowable emission limits are 1.0 pph and 1.0 tpy for each regulated air pollutant (except for H<sub>2</sub>S) emitted by that source as follows: <ol style="list-style-type: none"> <li>(a) For flares, when there are no allowable emission limits in Sections A106 and/or A107.</li> <li>(b) For regulated sources with emission limits in Sections A106 or A107 represented by the less than sign (“&lt;”).</li> <li>(c) For regulated sources that normally would not emit any regulated air pollutants, including but not limited to vents, pressure relief devices, connectors, etc.</li> </ol> </li> <li>(3) For excess emissions reporting as required by 20.2.7 NMAC for H<sub>2</sub>S, the allowable limits are 0.1 pph and 0.44 tpy for each applicable scenario addressed in paragraph (2) above.</li> </ol>
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**ETC-569-2201 NOV Attachment # 2 Malfunction Excess Emission Event Duration, Excess Emissions, and Number of Hourly Exceedances**

Activity No.	Unit	Duration (Hours)	No <sub>x</sub> (lbs)	CO (lbs)	VOC (lbs)	SO <sub>2</sub> (lbs)	Pb (lbs)	H <sub>2</sub> S (lbs)	# of Pollutants	Claims
000569-07232021-01	9F	2				407.2			1	2
000569-07262021-01	9F	0.25				349.56			1	1
000569-08022021-02	9F	18		0.62		996.63			2	36
000569-08022021-01	10F	5	285.97	2455.08	365.33				3	15
000569-08022021-03	10F	12	98.83	854.88	36.26				3	36
000569-08022021-04	9F	2				619.17			1	2
000569-08022021-05	9F	5				922.25			1	5
000569-08042021-01	9F	0.17				146.89			1	1
000569-08052021-01	9F	8				1690.18			1	8
000569-08102021-01	9F	0.25				332.83			1	1
000569-08132021-01	10F	2	142.66	1224.5	98.94				3	6
000569-08132021-02	9F	6.98				552.24			1	7
000569-08162021-02	9F	10				1418.71			1	10
000569-08162021-03	10F	38	298.11	2577.95	669.75				3	114
000569-08162021-01	10F	6.98	304.6	608.79	600.45	963.18			4	28
000569-08202021-01	9F	2				790.24			1	2
000569-08202021-02	10F	8	268.85	537.33	529.96	850.1			4	32
000569-08232021-01	9F	4				998.49			1	4
000569-08252021-01	9F	0.23				0			0	0
000569-08272021-01	10F	5	168.04	335.86	331.27	531.39			4	20
000569-09022021-01	9F	18.75				0			0	0
000569-09072021-01	10F	2	121.86	243.48	240.1	385.14			4	8



000569-09072021-02	10F	0.25	1.01	9.31	0.45				3	3
000569-09092021-01	9F	0.25				373.74			1	1
000569-09102021-01	9F	3			1.83				1	3
000569-09132021-01	9F	4			1.21				1	4
000569-09132021-02	9F	8				821.85			1	8
000569-09152021-01	9F	21			1.63	589.42			2	42
000569-09172021-01	9F	0.33				316.1			1	1
000569-09212021-01	9F	8				1087.74			1	8
000569-09222021-01	9F	0.42		0.46		529.92			2	2
000569-09272021-01	9F	0.75				431.38			1	1
000569-09272021-02	9F	25		1.49		6786.75			2	50
000569-09272021-03	10F	0.53	21.36	184.38	18.37				3	3
000569-09282021-01	9F	0.08				141.31			1	1
000569-09292021-01	9F	7.75			0.54	310.52			2	16
000569-09292021-03	10F	11				1784.79			1	11
000569-09292021-02	10F	4	171.35	1471.7	107.21				3	12
000569-10192021-01	9F	0.12				120.86			1	1
000569-10222021-01	9F	0.5				198.95			1	1
000569-10222021-02	9F	18				721.44			1	18
000569-10252021-01	9F	22.98				2160.6			1	23
000569-10262021-01	9F	0.12				6.8			1	1
000569-10282021-01	9F	0.17				109.7			1	1
000569-10292021-01	10F	0.62				0			0	0
000569-11042021-01	10F	0.25	1.17	10.67	1.54				3	3
000569-11152021-01	10F	9	283.51	566.6	816.98	786.31			4	36
000569-11222021-01	10F	0.5	12.29	106.03	1.08				3	3
000569-11222021-02	9F	3				738.18			1	3

000569-12132021-02	10F	7	429.22	857.58	1236.38	1189.96			4	28
000569-12132021-01	9F	26				256.59			1	26
000569-12212021-01	10F	0.05	0.56	4.8	0.02				3	3
000569-12292021-01	9F	0.13				169.2			1	1
000569-12302021-01	9F	0.03				117.14			1	1
000569-01032022-01	9F	0.2				180.36			1	1
000569-01132022-01	9F	0.13				105.98			1	1
000569-01142022-01	9F	0.1				37.19			1	1
000569-01142022-02	9F	17				505.75			1	17
000569-01172022-01	9F	0.25				392.33			1	1
000569-01182022-01	9F	0.08				251.02			1	1
000569-02022022-01	9F	0.17				206.39			1	1
000569-02032022-01	9F	0.33				345.85			1	1
000569-02072022-01	10F	6	4.42	9.02	13.17	12.68			4	24
000569-02112022-02	9F	0.25				444.39			1	1
000569-02112022-01	10F	0.83	96.26	825.99	29.28				3	3
000569-02142022-01	9F	31				3121.9			1	31
000569-02152022-01	9F	0.08				70.66			1	1
000569-02252022-01	9F	7		4.62		4012.55			2	14
000569-02252022-02	10F	0.17		2.9	0.2				2	2
000569-02282022-01	9F	0.1				87.39			1	1
000569-03042022-01	9F	0.15				70.66			1	1
000569-03082022-01	10F	0.25		13.36	1.04				2	2
000569-03152022-01	9F	0.17				154.33			1	1
000569-03282022-01	10F	6.98		198.73	12.76				2	14
000569-03282022-02	10F	0.25		7.11	10.33	9.94			3	3
000569-03282022-03	9F	0.25	0.17	1.58	0.45	771.64			4	4

000569-03282022-04	9F	0.17				200.81			1	1
000569-04212022-01	9F	4		4.97		2796.51			2	8
000569-04212022-02	9F	16				1061.71			1	16
000569-04252022-01	9F	0.25			0.99				1	1
000569-04252022-02	10F	6.23		556.72	802.75	772.62			3	21
000569-04272022-01	9F	4				349.56			1	4
000569-04282022-01	9F	0.25				148.75			1	1
000569-05022022-01	9F	3				1221.61			1	3
000569-05032022-01	9F	10.98				671.24			1	11
000569-05042022-01	9F	0.08				119			1	1
000569-05052022-01	9F	0.5		0.36		507.61			2	2
000569-05092022-01	9F	0.75				425.8			1	1
000569-05092022-02	9F	0.18				143.17			1	1
000569-05112022-01	9F	0.63			1.2				1	1
000569-05182022-01	10F	0.28		36.47		50.66			2	2
000569-05252022-01	9F	8.13				316.1			1	9
000569-05262022-01	9F	10				669.38			1	10
000569-06092022-01	10F	3		55.28		76.67			2	6
000569-06132022-02	10F	33				700.15			1	33
000569-06132022-01	10F	0.25				12.78			1	1
000569-06132022-03	9F	9				1015.22			1	9
000569-06152022-01	10F	1							0	0
000569-06162022-01	10F	7				2600.2			1	7
000569-06162022-02	9F	0.5				159.91			1	1
000569-06202022-01	10F	30				21.4			1	30
000569-06202022-02	10F	0.05				6.34			1	1
000569-06212022-01	10F	0.17				9.23			1	1

000569-06222022-01	10F	0.03				2.48			1	1
000569-06232022-01	10F	13				11.76			1	13
000569-06302022-01	10F	0.53							0	0
000569-06302022-02	9F	0.88				462.99			1	1
000569-07112022-01	9F	0.25				37.19			1	1
000569-07182022-01	9F	0.33				50.2			1	1
000569-08122022-01	10F	0.65				1.004			1	1
000569-08152022-02	10F	0.13				1.4009			1	1
000569-08152022-01	10F	4.3				42.4569			1	5
000569-09082022-01	9F	0							0	0
000569-09082022-02	9F	0							0	0
000569-09122022-02	9F	9.87	4.312	23.05	10.71	7453.69		79.195	5	50
000569-12292022-01	9F	28.58	55.68	122.2	98.7	5961		63.3	5	145
000569-02082023-01	10F-SSM	7.77	1690.47	3375	2920	7558		80	5	40

**ETC-569-2201 NOV Attachment #3 Table for ADD Analysis**

Activity No	Release Pt No.	Release Pt Description	Event Type	ADD Due Date	ADD Submittal Date	ADD Accepted	If NO, Regulation Citation	Notes
000569-08022021-05	9F	Treatment Flare	Malfunction, Title V Deviation	9/15/2021	9/15/2021	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outage due to weather, power outages occur on a regular basis and must be planned for. EER event type selected as Malfunction not Emergency, no proof of electrical storm provided, compliance reviewer reviewed
000569-08162021-01	10F	Inlet Flare	Malfunction, Title V Deviation	9/27/2021	9/24/2021	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.
000569-08162021-02	9F	Treatment Flare	Malfunction, Title V Deviation	9/27/2021	9/24/2021	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.
000569-08162021-03	10F	Inlet Flare	Malfunction, Title V Deviation	9/27/2021	9/24/2021	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.
000569-09292021-02	10F	Inlet Flare	Malfunction, Title V Deviation	11/8/2021		No	20.2.7.111.A(9) NMAC	ADD not submitted with in 30 days.
000569-11152021-01	10F	Inlet Flare	Malfunction, Title V Deviation	12/17/2021	12/15/2021	Yes		
000569-12132021-01	9F	Treatment Flare	Malfunction, Title V Deviation	1/14/2022	1/14/2022	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.
000569-12132021-02	10F	Inlet Flare	Malfunction, Title V Deviation	1/14/2022	1/14/2022	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.
000569-02072022-01	10F	Inlet Flare	Malfunction, Title V Deviation	3/11/2022	3/10/2022	No	20.2.7.111.A(9) NMAC	Late Initial EER (3 days), no AQBCR outages logged for time period.
000569-02112022-01	10F	Inlet Flare	Malfunction, Title V Deviation	3/25/2022	3/24/2022	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.
000569-03282022-01	10F	Inlet Flare	Malfunction, Title V Deviation	4/29/2022	4/20/2022	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.
000569-03282022-02	10F	Inlet Flare	Malfunction, Title V Deviation	4/29/2022	4/27/2022	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.
000569-03282022-03	9F	Treatment Flare	Malfunction, Title V Deviation	4/29/2022	4/27/2022	No	20.2.7.111.A(2)(a) and (b) NMAC	Power outages occur on a regular basis and must be planned for. Source did not take all possible actions to reduce/limit EE.