

From: [Jayme Sadlier](#)
To: [REDACTED]
Cc: [TCEQR1AIR](#); [Ramiro Garcia](#); [Susan Johnson](#); [Tracy Miller](#); [OCE](#); [Randy Ammons](#)
Subject: Fw: Scout Energy PCC and Deviation Report Enforcement Discretion - SOP O-03161
Date: Tuesday, March 31, 2020 9:31:18 AM
Attachments: [image001.png](#)
[BurnettMain&B PCC & Deviation Report 3.2020.pdf](#)

Hello Ms. Morgan,

During the COVID-19 pandemic, the TCEQ is accepting electronic versions of documents if a customer is unable to mail or otherwise deliver a hard copy document, as required by permit/rule/statute. Dedicated email addresses, by TCEQ Region, have also been set-up for receiving the documents <35MB in size during the pandemic. The TCEQ Amarillo Region email (TCEQR1AIR) has been cc:ed on this email, so please consider the attached deviation report received by the TCEQ Amarillo region.

The TCEQ-region specific email addresses will be posted on the TCEQ public website soon. In the meantime, if you have additional air program documents for the Carson County facility that you are unable to provide as a hard copy, please utilize the TCEQR1AIR address and provide a brief summary within the body of your email describing the COVID-19 circumstance preventing the hard copy submittal. If you have an electronic document >35MB, please send an email to TCEQR1AIR to request a file transfer protocol. Please only use this email address if you are unable to provide the submittal via postal mail.

Once the COVID-19 pandemic has ended, please resume providing hard copies with original signatures, if required. You do not need resubmit, by hard copy, the underlying report/data already electronically-submitted during the pandemic timeframe.

Thank you,
Jayme Sadlier, Special Assistant
TCEQ Office of Compliance and Enforcement

From: Elizabeth Morgan <[REDACTED]>
Sent: Monday, March 30, 2020 2:04 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Kevin Rathke <[REDACTED]> Chris Marlais <[REDACTED]> Bonnie Epp <[REDACTED]>
Subject: Scout Energy PCC and Deviation Report Enforcement Discretion - SOP O-03161

To Whom it May Concern:

Scout Energy Management LLC (Scout) is requesting enforcement discretion concerning the submittal of annual Permit Compliance Certification (PCC) and Semi-Annual Deviation Reports.

Scout's PCC and Semi-Annual Deviation Report for the Lynx Main & B facility (RN100211580, SOP #O-03161) is due by the end of March.

Code of Federal Regulations Title 40 Part 70 and Texas Administrative Code Title 30 Chapter 122 guidance state PCC's and deviation reports are to be mailed in, and electronic versions are not accepted. However, due to the current outbreak of the Coronavirus Disease 2019 (COVID-19), Scout's offices are closed to employees at this time. Therefore, it is not possible to obtain the appropriate signatures and hard copies of this report to mail in without potentially endangering the health and welfare of Scout employees. As such, Scout will keep the attached record as documentation of compliance and mail the hard copy when it is deemed safe to do so. The current reopen date for Scout's office is unknown at this time; however, we will reevaluate this delay in compliance no later than April 30th, 2020.

The certifying Responsible Official, Kevin Rathke, is aware of our need to delay submitting these reports and is included on this email. Please let me know if any additional information is needed.

Thank you,

Liz Morgan
Environmental Specialist



Scout Energy Management LLC
4901 LBJ Freeway, Suite 300
Dallas, TX 75244
(972) 430-2466





March 30, 2020

Texas Commission on Environmental Quality
Amarillo Field Office – Region 1
3918 Canyon Dr.
Amarillo, TX 79109

*RE: Annual Permit Compliance Certification and Semi-Annual Deviation Report
Lynx Main & B
Customer Reference CN605147479
Regulated Entity RN100211580
Permit #O-03161*

To Whom it May Concern:

Scout Energy Management, LLC (Scout) owns and operates the Lynx Main & B natural gas compressor station in Carson County, Texas, which is currently authorized under Federal Operating Permit No. O-03161. Scout is providing the annual permit compliance certification (PCC) for Lynx Main & B for the period of March 1, 2019 through February 29, 2020. The following documents are also provided with this certification:

- Form OP-CRO1 (Certification by Responsible Official); and
- Form Dev Rep – Part 1 (Federal Operating Permit Deviation Report Form) for the period of September 1, 2019 through February 29, 2020.

Code of Federal Regulations Title 40 Part 70 and Texas Commission on Environmental Quality guidance state PCC's and deviation reports are to be mailed in, and electronic versions are not accepted. However, due to the current outbreak of the Coronavirus Disease 2019 (COVID-19), Scout's offices are closed to employees at this time. Therefore, it is not possible to obtain the appropriate signatures and hard copies of this report to mail in without potentially endangering the health and welfare of Scout employees. As such, Scout will keep this record as documentation of compliance and mail the hard copy when it is deemed safe to do so. The current reopen date for Scout's office is unknown at this time.

If you have any questions, please contact me via email at [REDACTED] or call my office number at 972-430-2466.

Sincerely,

Liz Morgan
Environmental Specialist

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information		
RN: 100211580	CN: 605147479	Account No.: CF-0094-I
Permit No.: O-3161	Project No.:	
Area Name: Lynx Main & B	Company Name: Scout Energy Management, LLC	
II. Certification Type <i>(Please mark the appropriate box)</i>		
<input checked="" type="checkbox"/> Responsible Official	<input type="checkbox"/> Duly Authorized Representative	
III. Submittal Type <i>(Please mark the appropriate box) (Only one response can be accepted per form)</i>		
<input type="checkbox"/> SOP/TOP Initial Permit Application	<input type="checkbox"/> Update to Permit Application	
<input type="checkbox"/> GOP Initial Permit Application	<input type="checkbox"/> Permit Revision, Renewal, or Reopening	
<input checked="" type="checkbox"/> Other: <u>Annual Permit Compliance Certification and Semi-Annual Deviation Report</u>		
IV. Certification of Truth		
<p>This certification does not extend to information which is designated by the TCEQ as information for reference only.</p> <p>I, <u>Kevin Rathke</u> certify that I am the <u>RO</u> <i>(Certifier Name printed or typed)</i> <i>(RO or DAR)</i></p> <p>and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:</p> <p><i>Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).</i></p> <p>Time Period: From <u>03/01/2019</u> to <u>02/29/2020</u> <i>Start Date</i> <i>End Date</i></p> <p>Specific Dates: <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <i>Date 1</i> <i>Date 2</i> <i>Date 3</i> <i>Date 4</i> <i>Date 5</i> <i>Date 6</i></p>		
Signature: _____ Signature Date: _____		
Title: <u>VP of Operations</u>		

Texas Commission on Environmental Quality
 Federal Operating Permit Form
 Permit Compliance Certification - PCC (Part 1)

AIR CO/ 100211580 /RP

Permit Holder Name Scout Energy Management, LLC

Customer Number /CN

CN 605147479

Area Name Lynx Main & B

Account Number

CF-0094-I

Operating Permit Number O 03161

Report Submittal Date

TBD

Certification Period Start Date Mar 1, 2019

End Date

Feb 29, 2020

I. Certification of Continuous Compliance with Permit Terms and Conditions Response:
 (Indicate response by placing a 'x' in the appropriate column for each of the following questions)

With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?

Yes No

II. Summary of Deviations Response:
 (Indicate response by placing a 'x' in the appropriate column for each of the following questions)

A. Were there any deviations from any permit requirements during the Certification Period that have *previously* been reported to the agency?

If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal.

Important Note: If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.

Yes No

B. Were there any deviations from any terms or conditions of the permit during the Certification Period that are *currently* being submitted to the agency?

If the answer to this questions is 'Yes', please include the relevant reports along with this page.

Yes No

Texas Commission on Environmental Quality
 Federal Operating Permit Form
 Permit Compliance Certification - PCC (Part 2)

AIR CO/ 100211580 /RP

Permit Holder Name Scout Energy Management, LLC

Customer Number /CN CN 605147479

Area Name Lynx Main & B

Account Number CF-0094-I

Operating Permit Number O 03161

Report Submittal Date TBD

Certification Period Start Date Mar 1, 2019

End Date Feb 29, 2020

Identification of Deviation Reports Submitted During the Certification Period
 (Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of Unit, Name of Rule, Driver for Report, etc.)	Report Submitted To	Report Previously Certified?
TBD	Semi-Annual Deviation Report September 1, 2019 - February 29, 2020	TCEQ Region 1 Office, EPA Region 6	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Sep 27, 2019	Semi-Annual Deviation Report March 1, 2019 - August 31, 2019	TCEQ Region 1 Office, EPA Region 6	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
July 3, 2019	Semi-Annual Deviation Report September 1, 2017 - February 28, 2019	TCEQ Region 1 Office, EPA Region 6	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No

Texas Commission on Environmental Quality
 Federal Operating Permit Form
 PCC - Monitoring Options Selected (Part 3)

AIR CO/ /RP

Permit Holder Name

Customer Number

CN

Area Name

Account Number

Operating Permit Number

Report Submittal Date

Certification Period Start Date

End Date

ID Number		Regulatory Requirement (Rule or Permit No. and Prov.)	Pollutant Monitored	SOP or GOP Index Number	Monitoring Option Used	Date		Description/Comments
Unit ID	Group ID GRPXXXXXXX				Specification Citation	Begin	End	
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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**Texas Commission on Environmental Quality
Federal Operating Permit Deviation Report Form
Form Dev Rep (Part 1)**

Permit Holder Name		Scout Energy Management, LLC				Customer Number	CN605147479	
Area Name		Lynx Main & B				Account Number	CF-0094-I	
Report Period Start Date	Sept 1, 2019	Report Period End Date	Feb 29, 2020	Operating Permit Number	O-03161	Report Submittal Date	TBD	
Operating Permit Requirement for Which Deviations are Being Reported								
ID Number		Term & Condition No.	Pollutant	Regulatory Requirement Citation	Type of Requirement	SOP or GOP Index Number	Monitoring Method	Monitoring Frequency
Unit ID	Group ID							
ENG-4 (CZZ-11), ENG-5 (CZZ-12)				40 CFR 63 Subpart ZZZZ		63ZZZZ-01		See cause of deviation

Dev Item No.	STEERS Incident No.	Deviation Period				No. of Dev	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
		Start		End				
		Date	Time	Date	Time			
1	N/A	09/01/2019		02/29/2020		2	Failure to replace oil filters within 2160 hours.	Oil filters are regularly changed; however, timing of filter change was slightly later than 2160 hours of operation. A new schedule is being put in place to track the change within a database.
Total Deviations:						2	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	