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March 8, 2018

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

James Lake Midstream, LLC
333 Clay Street, Suite 4500
Houston, Texas 77002
Certified Mail # 7017 2620 0001 1198 8496

Canyon Midstream Partners, LLC
333 Clay Street, Suite 4500
Houston, Texas 77002
Certified Mail # 7017 2620 0001 1198 8502

RE: Notice of Intent to Sue for Violations of the Clean Air Act

Dear Addressees:

On behalf of Sierra Club and its members, we are writing to provide you with notice that Sierra Club intends to file a civil lawsuit against you for repeated violations, described below, of the federal Clean Air Act, 42 U.S.C. § 7401 et seq., which occurred and continue to occur at the James Lake Gas Plant (“James Lake”).

The citizen suit provision of the Clean Air Act allows Sierra Club to commence a civil action in a United States District Court for violations of a Clean Air Act emission standard or limitation or for constructing without a permit. 42 U.S.C. § 7604(a)(1) and (a)(3). An emission standard or limitation is defined as any requirement under 42 U.S.C. § 7411 or § 7412, any condition or requirement applicable under a state implementation plan approved by the U.S. EPA, any Title V permit, or any requirement to obtain a permit as a condition of operations. 42 U.S.C. § 7604(f).

This notice is being provided pursuant to 42 U.S.C. § 7604(b) and 40 C.F.R. Part 54. Sierra Club will ask the Court to impose appropriate injunctive relief and civil penalties and require a beneficial environmental project under 42 U.S.C. § 7604(g)(2) in the areas directly impacted by the highest concentrations of air pollution emissions from James Lake. Sierra Club will also ask the Court to award Sierra Club its costs of litigation and attorneys’ fees.

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A. The Specific Provisions, Standards, Limitations, or Orders Which Have Been Violated

1. Texas State Implementation Plan Rules Related to Standard Permits that James Lake Has Repeatedly Violated and Is Violating.

On January 13, 2014, the Texas Commission on Environmental Quality (“TCEQ”) received a registration sent by you for a Standard Permit. On May 14, 2014, you received a letter from TCEQ providing you with Standard Permit Registration Number 116553 and a Standard Permit Maximum Emission Rates Table for that Permit. To the extent your Standard Permit has not become void by subsequent events, the Texas State Implementation Plan contains the following requirements regarding Standard Permits which James Lake has violated and is violating.

- a. You have repeatedly violated and are violating Standard Permit 116553’s Maximum Emission Rate Table and 30 TAC § 116.115(b)(2)(F) (Approved by EPA October 25, 2012 (77 Fed. Reg. 65119), effective November 26, 2012; *see* 40 C.F.R. § 52.2270).¹ 30 TAC § 116.115(b)(2)(F) provides:

Holders of permits, special permits, standard permits, and special exemptions shall comply with the following:

...

(F) Maximum allowable emission rates. The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." Emissions that exceed the maximum allowable emission rates are not authorized and are a violation of the permit.

¹EPA’s compilation of Texas SIP can be found at:
<https://www.epa.gov/sips-tx/current-texas-sip-approved-regulations>

- b. You have repeatedly violated and are violating Standard Permit 116553's Maximum Emission Rate Table and 30 TAC § 116.115(b)(2)(F) because emissions from James Lake have exceeded the following limits:
- (i) 8790.145 lbs/hr of SO₂ from FL-2²
 - (ii) 246.12 tons per year of SO₂ from FL-2
 - (iii) 8790.79 lbs/hr of SO₂ from James Lake
 - (iv) 248.94 tons per year of SO₂ from James Lake

2. Texas State Implementation Plan Rules Related to Prevention of Significant Deterioration that James Lake Has Violated and Is Violating.

- a. You violated and are violating 30 TAC § 116.110(a)(Approved by EPA September 6, 2006 (71 FR 52664) effective October 6, 2006; *see* 40 C.F.R. § 52.2270). Under this provision, facilities that do not qualify for Standard Permits must obtain a permit under 30 TAC § 116.111, which as explained below, you did not do. This provision provides:

Before any actual work is begun on the facility, any person who plans to construct any new facility or to engage in the modification of any existing facility which may emit air contaminants into the air of this state shall either:

- (1) obtain a permit under Section 116.111 of this title (relating to General Application);
- (2) satisfy the conditions for a standard permit under the requirements in ... (A) Subchapter F of the chapter relating to Standard Permits....
- (3) NOT IN SIP [regarding flexible air permits]
- (4) satisfy the conditions for facilities permitted by rule under Chapter 106 of this title (relating to Permits by Rule), or

²FL-2 is James Lake's acid gas flare and is also referred to as FL-720. FL-1 is also referred to as the "emergency flare" and FL-721.

(5) NOT IN SIP [satisfy criteria for de minimis sources]

- b. 30 TAC § 116.111(a) requires that:

In order to be granted a permit...the application must include....

(2) information which demonstrates that emissions from the facility ... meet all of the following.

(I) Prevention of Significant Deterioration (PSD) review. If the proposed facility is located in an attainment area, it shall comply with all applicable requirements in this chapter concerning PSD review.

- c. PSD review requirements are in 30 TAC §§ 116.160 -116.169. 30 TAC § 116.160(a) states (emphasis added):

Each proposed **new major source** or major modification in an attainment or unclassifiable area shall comply with the requirements of this section. The owner or operator of a proposed new or modified facility that will be a new major stationary source for the prevention of significant deterioration air contaminant shall meet the additional requirements of subsection (c)(1) - (4) of this section.

- d. Under 30 TAC § 116.12(19), a “major source” is defined as:

[A]ny stationary source that emits, or has the potential to emit, a threshold quantity of emissions or more of any air contaminant (including volatile organic compounds (VOCS)) for which a national ambient air quality standard has been issued.... [T]he major source thresholds for prevention of significant deterioration pollutants are identified in 40 Code of Federal Regulations (C.F.R.) § 51.166(b)(1)....

- e. Under 40 C.F.R. § 51.166(b)(1)(i)(b), the major source threshold for SO₂ for a facility like James Lake is 250 tons per year.

- f. Your Standard Permit registration does not satisfy the requirements of 30 TAC § 116.110(a). Under 30 TAC §§ 116.610(b) & (c), sources subject to PSD cannot obtain standard permits:

(b) Any project, except those authorized under §116.617 of this title (relating to Standard Permits for Pollution Control Projects), which constitutes a new major source, or major modification under the new source review requirements of the FCAA, Part C (Prevention of Significant Deterioration Review) or Part D (Nonattainment Review) and regulations promulgated thereunder is subject to the requirements of §116.110 of this title (relating to Applicability) rather than this subchapter.

(c) Persons may not circumvent by artificial limitations the requirements of §116.110 of this title.

3. Clean Air Act Provisions Related to Prevention of Significant Deterioration that James Lake Has Violated and Is Violating.

- a. You violated and are violating 42 U.S.C. § 7475(a), which provides in pertinent part that:

No major emitting facility on which construction is commenced after August 7, 1977, may be constructed in any area to which this part applies unless—

(1) a permit has been issued for such proposed facility in accordance with this part setting forth emission limitations for such facility which conform to the requirements of this part...

- b. 42 U.S.C. § 7479(1) provides that:

The term “major emitting facility” means any of the following stationary sources of air pollutants which emit, or have the potential to emit, one hundred tons per year or more of any air pollutant from the following types of stationary sources.... Such term also includes any other source with the potential to emit two hundred and fifty tons per year or more of any air pollutant....

4. Federal Operating Permit Program Requirements that James Lake Has Repeatedly Violated and Is Violating.

- a. You have violated and are violating 30 TAC § 122.121,³ which provides that subject facilities may not operate without a federal operating permit. This section provides that:

Except as provided in § 122.138 of this title (relating to Application Shield), owners and operators of sites identified in § 122.120 of this title (relating to Applicability) shall not operate emission units at those sites without a permit issued or granted under this chapter.

- b. Chapter 122 of Title 30 of the Texas Administrative Code addresses the Federal Operating Permits Program.

- c. 30 TAC § 122.120 provides as follows:

(a) Except as identified in subsection (b) of this section, owners and operators of one or more of the following are subject to the requirements of this chapter:

(1) any site that is a major source as defined in §122.10 of this title (relating to General Definitions)

...

(4) any site that is a non-major source which the United States Environmental Protection Agency (EPA), through rulemaking, has designated as no longer exempt or no longer eligible for a deferral from the obligation to obtain a permit. For the purposes of this chapter, those sources may be any of the following:

(A) any non-major source so designated by the EPA, and subject to a standard, limitation, or other requirement under FCAA, § 111 (Standards of Performance for New Stationary Sources).

³EPA has approved the federal operating permit program for the State of Texas. *See* 40 C.F.R. Pt. 70, App. A.

- d. 30 TAC §122.10(13)(C) provides as follows:

The definitions in the Texas Clean Air Act, Chapter 101 of this title (relating to General Air Quality Rules), and Chapter 3 of this title (relating to Definitions) apply to this chapter. In addition, the following words and terms, when used in this chapter, have the following meanings, unless the context clearly indicates otherwise.

...

(13) Major Source –

...

- (C) Any site which directly emits or has the potential to emit, 100 tpy or more of any air pollutant.

- e. Under 30 TAC § 122.130(b), new sites cannot operate until an abbreviated application is submitted.
- f. Under 30 TAC § 122.134(c), if an applicant has submitted an abbreviated application, the Executive Director shall inform the application of the deadline for submitting the remaining information.
- g. Under 30 TAC § 122.136, if “an applicant omits any relevant facts or submits incorrect information in an application, the applicant shall submit the relevant facts or correct the information no later than 60 days after discovering the error.”
- h. On May 27, 2015, you received a letter from TCEQ stating that James Lake qualified for Oil and Gas General Operating Permit (GOP) 514. Specifically, the letter stated (emphasis added):

After reviewing your initial application, the Texas Commission on Environmental Quality (TCEQ) executive director has determined that the emission units identified at the James Lake Gas Plant qualify for the Oil and Gas General Operating Permit (GOP) Number 514, if operated as represented in your application. This letter serves to authorize James Lake Midstream LLC, James Lake Gas Plant, to operate the emission units identified in the GOP application under the provisions of GOP Number 514. This authorization is granted based on the information provided in

your application. **In the event the agency subsequently determines that the emission units do not qualify for the GOP or are not operating in compliance with the GOP, enforcement action may be initiated.**

- i. Condition (a)(2) of GOP 514 (both as in effect on May 27, 2015 and the version that took effect in July 2017) provides that:

Emission units authorized by any case-by-case New Source Review (NSR) permits under Title 30 Texas Administrative Code (TAC) Chapter 116 (Control of Air Pollution by Permits for New Construction or Modification) shall not be authorized under this GOP.

5. New Source Performance Standard Requirements that James Lake Has Repeatedly Violated and Is Violating.

- a. NSPS Subpart OOOO, 40 C.F.R. §§ 60.5360 - 5430, applies to natural gas processing facilities with sweetening units, such as James Lake. 40 C.F.R. § 60.5365(g) provides that:

You are subject to the applicable provisions of this subpart if you are the owner or operator of one or more of the onshore affected facilities listed in paragraphs (a) through (g) of this section for which you commence construction, modification or reconstruction after August 23, 2011, and on or before September 18, 2015.

...

(g) Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

(1) Each sweetening unit that processes natural gas is an affected facility; and

(2) Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.

(3) Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and §§60.5410(g) and 60.5415(g) of this subpart.

(4) Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

b. You have violated and are violating, 40 C.F.R. § 60.5405(b), which provides that:

After demonstrating compliance with the provisions of paragraph (a) of this section, you must achieve at a minimum, an SO₂ emission reduction efficiency (Z_c) to be determined from Table 2 of this subpart based on the sulfur feed rate (X) and the sulfur content of the acid gas (Y) of the affected facility.

Table 2, referred to above, provides as follows:

Table 2 to Subpart OOOO of Part 60—Required Minimum SO₂ Emission Reduction Efficiency (Z_c)

H ₂ S content of acid gas (Y), %	Sulfur feed rate (X), LT/D			
	2.0 ≤ X ≤ 5.0	5.0 < X ≤ 15.0	15.0 < X ≤ 300.0	X > 300.0
Y ≥ 50	74.0	85.35X ^{0.0144} Y ^{0.0128} or 99.9, whichever is smaller.		
20 ≤ Y < 50	74.0	85.35X ^{0.0144} Y ^{0.0128} or 97.5, whichever is smaller		97.5
10 ≤ Y < 20	74.0	85.35X ^{0.0144} Y ^{0.0128} or 90.8, whichever is smaller		90.8
Y < 10	74.0	74.0	74.0	74.0

X = The sulfur feed rate from the sweetening unit (*i.e.*, the H₂S in the acid gas), expressed as sulfur, Mg/D(LT/D), rounded to one decimal place.

Y = The sulfur content of the acid gas from the sweetening unit, expressed as mole percent H₂S (dry basis) rounded to one decimal place.

Z = The minimum required sulfur dioxide (SO₂) emission reduction efficiency, expressed as percent carried to one decimal place. Z_i refers to the reduction efficiency required at the initial performance test. Z_c refers to the reduction efficiency required on a continuous basis after compliance with Z_i has been demonstrated.

c. You have also violated and are violating 40 C.F.R. § 60.11(d), which provides that:

At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with

good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

B. The Activities Alleged to Be in Violation and Dates of Those Violations

1. Violations of Standard Permit 116553, Maximum Emission Rate Table and 30 TAC § 116.115(b)(2)(F)

- a. To the extent your Standard Permit 116553 is not void, you have repeatedly violated Standard Permit 116553, Maximum Emission Rate Table and 30 TAC § 116.115(b)(2)(F) by exceeding the SO₂ emission limit for FL-2 of 246.12 tons per year for calendar years 2015, 2016, and 2017.
- b. To the extent your Standard Permit 116553 is not void, you have repeatedly violated Standard Permit 116553, Maximum Emission Rate Table and 30 TAC § 116.115(b)(2)(F) by exceeding the SO₂ emission limit for James Lake of 248.94 tons per year for calendar years 2015, 2016, and 2017.
- c. To the extent your Standard Permit 116553 is not void, you have repeatedly violated Standard Permit 116553, Maximum Emission Rate Table and 30 TAC § 116.115(b)(2)(F) exceeding the hourly SO₂ limit of 8790.145 lb/hr SO₂ for FL-2 58 times during the following dates:

Air Emissions Event Incident Number	Dates	Average SO₂ Rate over Duration of Incident, lb/hr	Number of Exceedances of 8,790.145 lb/hr SO₂ Limit
240601	8/2/2016	9,418.338	1
242054	8/10/2016	14,148.780	1
241928	8/15-16/2016	11,109.419	3
244472	9/23/2016	9,038.719	1
246499	11/2/2016	12,345.289	1

Air Emissions Event Incident Number	Dates	Average SO₂ Rate over Duration of Incident, lb/hr	Number of Exceedances of 8,790.145 lb/hr SO₂ Limit
248464	12/8-9/2016	9,418.014	10
251313	12/13/2016	39,560.556	2
251472	12/13/2016	39,560.556	2
250206	1/10/2017	12,073.640	1
258006	5/16/2017	13,720.036	1
259729	6/6/2017	12,512.459	6
260541	6/19/2017	17,252.000	1
262146	6/29/2017	18,709.785	6
301622	1/27-28/2019	11,712.519	22

- d. To the extent your Standard Permit 116553 is not void, you have repeatedly violated Standard Permit 116553, Maximum Emission Rate Table and 30 TAC § 116.115(b)(2)(F) exceeding the hourly SO₂ limit of 8790.79 lb/hr SO₂ for James Lake 58 times during the following dates:

Air Emissions Event Incident Number	Dates	Average SO₂ Rate over Duration of Incident, lb/hr	Number of Exceedances of 8,790.79 lb/hr SO₂ Limit
240601	8/2/2016	9,418.34	1
242054	8/10/2016	14,148.78	1
241928	8/15-16/2016	11,426.83	3
244472	9/23/2016	9,038.13	1
246499	11/2/2016	12,345.29	1

Air Emissions Event Incident Number	Dates	Average SO2 Rate over Duration of Incident, lb/hr	Number of Exceedances of 8,790.79 lb/hr SO2 Limit
248464	12/8-9/2016	9,418.01	10
251313	12/13/2016	39,560.56	2
251472	12/13/2016	39,560.56	2
250206	1/10/2017	15,092.05	1
258006	5/16/2017	13,732.44	1
259729	6/6/2017	12,539.51	6
260541	6/19/2017	17,252.00	1
262146	6/29/2017	18,709.78	6
301622	1/27-28/2019	11,712.52	22

2. Violation of 30 TAC § 116.110(a)

Under, 30 TAC § 116.12(19), James Lake is a “major source” for purposes of the Prevention of Significant Deterioration program because it emitted more than 250 tons per year of SO₂ between the time the plant began operation in 2014 and March 12, 2015. In fact, the plant continued to emit above major source thresholds from March 12, 2015 until June 14, 2018. Under 30 TAC § 116.610(b) & (c), sources subject to the Prevention of Significant Deterioration program are ineligible for Standard Permits. Consequently, as of March 12, 2015, James Lake became of Prevention of Significant Deterioration source and therefore violated 30 TAC § 116.110(a) by constructing and operating James Lake without a permit issued pursuant to 30 TAC § 116.111 containing Prevention of Significant Deterioration requirements. It has violated this requirement every day the plant has operated since March 12, 2015.

3. Violation of Section 7475 of the Clean Air Act

Pursuant to the facts laid out in the previous paragraph, you are also violating 42 U.S.C. § 7475, which prohibits the construction of a major emitting facility without a Prevention of Significant

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Deterioration Permit. This violation began on March 12, 2015 and has continued every day the plant has operated since that time.

4. Violation of 30 TAC § 122.121

You submitted an abbreviated application for a General Operating Permit a (GOP) on October 29, 2014. You submitted a complete application for a GOP on December 22, 2014. As discussed in the previous two paragraphs, the facility's emissions exceeded the major source threshold as of March 12, 2015. In its GOP permit applications, you did not disclose that the facility is a major source for Prevention of Significant Deterioration program purposes, and once the facility became a major source, you were obligated under 30 TAC § 122.136 to correct your application within 60 days. You did not, however, disclose the change in circumstances to TCEQ. On May 27, 2015, TCEQ authorized you to operate under GOP Number 514. In providing that authorization, TCEQ stated:

Emission units authorized by any case-by-case New Source Review (NSR) permits under Title 30 Texas Administrative Code (TAC) Chapter 116 (Control of Air Pollution by Permits for New Construction or Modification) shall not be authorized under this GOP.

Accordingly, because at the time of issuance, the facility was already subject to case-by-case new source review (the facility required a PSD permit), the GOP permit was immediately void. Consequently, since May 27, 2015, the facility has been operating without a federal operating permit in violation of 30 TAC § 122.121.

5. Violation of 40 C.F.R. § 60.5405(b)

James Lake is a natural gas processing facility with a sweetening unit. Therefore, it is subject to NSPS Subpart OOOO. *See* 40 C.F.R. § 60.5365(g).

In its initial application for a standard permit, the facility disclosed that its uncontrolled acid gas flow from its regenerator would be 20,482.5 tons per year, or around 50 long tons per day. Therefore, because the facility has the capacity to process more than two long tons per day of hydrogen sulfide, it is not entitled to the exemptions in 40 C.F.R. § 60.5365(g)(3).

In that same permit application, the facility asserted that its sweetening unit would not be subject to Subpart OOOO because its acid gas was being routed to an injection well: "The amine unit will also be exempted from coverage because the amine still vent emissions will be routed to an acid gas injection well." Under 40 C.F.R. § 60.5365(g)(4), complete acid gas injection into the ground exempts sweetening units from most of Subpart OOOO's requirements:

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Sweetening facilities producing acid gas that is **completely reinjected** into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

(Emphasis added). However, James Lake is not achieving complete reinjection of the acid gas from the sweetening unit. Almost 2500 tons of SO₂ have been emitted since the plant began operation in late 2014, and most of this SO₂ comes from flaring acid gas from the sweetening unit that was never reinjected into the ground.

Sweetening facilities subject to all of the requirements of Subpart OOOO, as alleged here, must meet an SO₂ emission reduction efficiency requirement through the use of some SO₂ control device, such as a sulfur recovery unit. *See* 40 C.F.R. § 60.5405(b). Given the sulfur content of the acid gas the sweetening unit generates,⁴ according to Table 2 of Subpart OOOO, James Lake must achieve between a 74.0% and 97.5% SO₂ reduction efficiency, with the specific daily SO₂ reduction efficiency required by Subpart OOOO dependent on the daily sulfur feed rate from the sweetening unit (i.e., the H₂S in the acid gas expressed as sulfur in long tons per day). When James Lake injects the acid gas into the oil- or gas-bearing geologic strata, that is presumably achieving 100% control, but no control of SO₂ occurs when James Lake is flaring the acid gas. Given the SO₂ control efficiency requirements of Subpart OOOO, James Lake violated the SO₂ control efficiency requirements required to be met under 40 C.F.R. § 60.5405(b) for 170 days between November 17, 2014 and January 28, 2019, due to flaring of the acid gas from the sweetening unit on those days. The specific days of violation and flaring events are provided in Appendix 1 to this letter.

C. The Person or Persons Responsible for the Alleged Violations

The persons or persons responsible for the alleged violations are the owners and operators of James Lake, identified below:

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333 Clay Street, Suite 4500
Houston, Texas 77002
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333 Clay Street, Suite 4500
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⁴*See* Railroad Commission of Texas, Hearings Division, Oil & Gas Docket No. 08-0289658, James Lake Midstream Application for a Commercial Permit to Inject Fluid Containing Hydrogen Sulfide into a Reservoir Productive of Oil or Gas, at 7.

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D. The Location of the Alleged Violations

The location of the alleged violations is the James Lake Gas Plant. The nearest city is Goldsmith, Texas. The plant's physical location is:

From the intersection of US-385 and 2nd street in Odessa head North West on US-385 for 1.1 Miles. Go slightly West onto TX-450 Spur for 2.8 Miles. Continue on TX-302 for 9.8 Miles, then turn North on FM 866. The plant is East in 4.6 Miles.

E. The Date or Dates of Alleged Violations

The dates of the alleged violations are set forth in Section B above.

F. The Full Name and Address of the Person Giving the Notice

The person giving this notice is:

Sierra Club
2101 Webster St., Suite 1300
Oakland, California 94612
Phone: (415) 977-5500

Sierra Club's Lone Star Chapter's Office is:

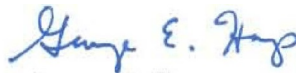
Sierra Club
Lone Star Chapter
6406 N IH-35, Suite 1806
Austin, Texas 78765

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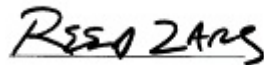
G. Conclusion

If you believe any of the facts described above are in error or have any information indicating that you have not violated the Clean Air Act, we urge you to contact us immediately. In addition, Sierra Club is always interested in resolving such matters without expensive litigation. Consequently, if you are interested in discussing settlement, please contact us.

Sincerely,



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Canyon Midstream Partners, LLC*
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Appendix 1	
Air Emissions Event Incident Number	Dates of NSPS Subpart OOOO, 40 CFR 60.5405(b) Violations at James Lake Plant
206622	11/17/2014
206621	11/18/2014
206661	11/19/2014
206721	11/21/2014
206739	11/22/2014
206784	11/23/2014
206812	11/24/2014
206846	11/25/2014
206850	11/26/2014
206855	11/27/2014
206860	11/28/2014
206866	11/29/2014
206947	11/30/2014
207011	12/1/2014
207074	12/2/2014
207092	12/3/2014
207142	12/5/2014
207161	12/5/2014
207167	12/6/2014
207219	12/7/2014
207243	12/8/2014
207314	12/9/2014
207363	12/10/2014
207424	12/11/2014
207435	12/12/2014
207433	12/12/2014
207460	12/14/2014
207529	12/15/2014
207582	12/16/2014
207643	12/17/2014
207695	12/18/2014
207750	12/21/2014
207786	12/22/2014
207794	12/23/2014
207800	12/24/2014
207805	12/25/2014
207811	12/26/2014
207817	12/27/2014
207840	12/28/2014
207891	12/29/2014
207927	12/30/2014
207964	12/31/2014
207990	1/1/2015
208576	1/12/2015
208578	1/13/2015
208707	1/14/2015
208838	1/16/2015

Air Emissions Event Incident Number	Dates of NSPS Subpart OOOO, 40 CFR 60.5405(b) Violations at James Lake Plant
208821	1/16/2015
208839	1/17/2015
208849	1/18/2015
208985	1/19/2015
208989	1/20/2015
209128	1/22/2015
209181	1/23/2015
209274	1/25/2015
209355	1/26/2015
209450	1/27/2015
209869	2/5/2015
209893	2/7/2015
210072	2/9-11/2015
210552	2/22-23/2015
210655	2/24-25/2015
210714	2/26/2015
211456	3/11-12/2015
212259	3/27/2015
212258	4/1/2015
217499	7/17-19/2015
219592	8/29-31/2015
222257	10/21-22/2015
225328	12/14-15/2015
246159	9/12/2016
245903	10/23/2016
246584	11/3/2016
246628	11/6-9/16
247508	11/18/2016
247640	11/23-12/8/2016
248464	12/8-9/2016
248621	12/11/2016
249490	12/28/2016
251658	1/23-24/2017
253718	3/2/2017
254042	3/11-12/2017
254375	3/18/2017
254421	3/20/2017
255495	4/3/2017
255896	4/8-9/2017
256417	4/16/2017
256623	4/19/2017
257205	4/26/2017
258463	5/22/2017
259058	5/31/2017
259639	6/5-6/2017
259729	6/6/2017
259795	6/7/2017
260221	6/12-15/2017
260457	6/16/2017

Air Emissions Event Incident Number	Dates of NSPS Subpart OOOO, 40 CFR 60.5405(b) Violations at James Lake Plant
260352	6/17/2017
260642	6/20/2017
260780	6/21/2017
260933	6/22/2017
261135	6/23/2017
262146	6/29/2017
262233	7/3-4/2017
262372	7/5/2017
262638	7/10/2017
263617	7/19/2017
264934	8/8/2017
265223	8/12-13/2017
267537	9/11/2017
267675	9/13/2017
268058	9/18/2017
267977	9/25/2017
269242	9/30/2017
270272	10/15/2017
276512	1/15/2018
277681	1/31/2018
284701	5/26/2018
287500	7/1/2018
287628	7/2/2018
289056	7/25/2018
290085	8/11/2018
293366	9/28-29/2018
299082	12/17/2018
299485	12/27/2018
299573	12/28/2018
299673	1/2-5/2019
301622	1/27-28/2019