

## EHS COMPLIANCE SUPPORT, AIR PERMITTING & SPCC PLANS



### PROJECT SCOPE

ESE Partners conducted comprehensive environmental compliance services for multiple facilities located in South Texas, including Spill Prevention, Control, and Countermeasure (SPCC) plan development and air permitting support. For the SPCC scope, ESE visited each facility to examine all relevant oil storage, handling, transfer, and loading/unloading operations, and conducted interviews with designated facility personnel to confirm operational practices. Containment deficiencies were identified, communicated to company personnel, and corrective actions were recommended. Based on these findings, ESE prepared final SPCC Plans for each site in accordance with regulatory requirements, ensuring they could be maintained and implemented on-site. For the air permitting scope, ESE prepared and submitted application packages to the Texas Commission on Environmental Quality (TCEQ) for both Permit By Rule (PBR) and Non-Rule Standard Permits. As facility equipment and operations evolved, ESE also prepared and submitted permit amendments to ensure all permits remained accurate, up-to-date, and in compliance with applicable TCEQ regulations.

### KEY CHALLENGES

ESE provided compliance and permitting assistance for the Client's assets, including 150 wellheads and 50 production facilities located in the Eagle Ford Shale reservoir. Client needed operational efficiency with rapid response to bring the assets into compliance with SPCC and Air permitting within 45 days of project authorization, to provide status to the company board. Additionally, with equipment swaps, asset acquisition, and required leak monitoring, the project was ever evolving to meet project and client environmental demands.

### OUTCOMES/RESULTS

ESE received TCEQ authorization on all air permitting application packages, SPCC plans were developed and certified, and projects were completed on schedule and under budget to bring the client into compliance in a timely manner (3-4 weeks of project authorization).

### LOCATION

Assets located in the Eagle Ford Shale reservoir