

Statement of Basis - Narrative

NSR Permit

Type of Permit Action: Regular-Significant Revision

Facility: 3 Bear Libby Gas Plant

Company: 3 Bear Delaware Operating – NM, LLC.

Permit No(s): 7482-M1

Tempo/IDEA ID No.: 38067 - PRN20190001

Permit Writer: Julia Kuhn

Fee Tracking

Tracking	NSR tracking entries completed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NA
	NSR tracking page attached to front cover of permit folder: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No NA
	Paid Invoice Attached: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Balance Due Invoice Attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Invoice Comments: Invoice paid in full on 10/18/2019

Permit Review	Date to Enforcement: 2/11/2020	Date of Enforcement Reply: 3/3/2020
	Date to Applicant: 2/11/2020	Date of Applicant Reply: 3/3/2020
	Date to EPA: NA	Date of EPA Reply: NA
	Date to Supervisor: 1/15/2020, 3/25/2020	

1.0 Plant Process Description:

The 3 Bear Libby Gas Plant will be equipped to gather natural gas from three surrounding compressor stations: 3 Bear Aztec Compressor Station, 3Bear Outland Compressor Station, and 3Bear Lariat Compressor Station, which are owned and operated by 3Bear. The gas from the compressor stations is sent to the gas processing plant for treatment.

Libby will separate natural gas liquids (NGLs) from the field gas, producing natural gas liquids and residue gas for transmission to a pipeline owned by others. The process utilizes a cryogenic gas separation plant and associated compressors for collecting field gas from the gathering system nearby. Gas and NGLs will be piped to the respective nearby interconnect metering stations, by others. The plant is to be located within 5 miles of the residue gas and NGL pipelines.

Compressor engines on site (ENG 1-4) will compress inlet gas and send the gas to the processing plant where an amine unit (AMINE-1) on site will treat and sweeten the gas. The amine unit is controlled by a thermal oxidizer (TO-1), and in the event that the thermal oxidizer is down, the gas will be sent to a flare (FL-1). The NGLs produced will be stored in pressurized vessels. Liquids from process drains will be sent to a gunbarrel tank (TK-1) for hydrocarbon separation. Oil from the gunbarrel separation will be stored in one 400-bbl slop oil tank (TK-6) and produced water will be stored in produced water tank (PWTK-1). Condensate tanks will store

stabilized condensate (TK 2-5). A tank flare (FL-2) controls all tanks on site, and condensate and oil will be trucked off site (CONDLOAD-1 and OILLOAD-1). An emergency and maintenance flare (FL-1) will control compressor blowdowns (COMP), plant blowdowns (PLANT BD), and emergency upset conditions. Fugitive emissions occur from process piping and other components (FUG 1-2). Road dust emissions occur from daily routine traffic to the production facility (HR-1). Additional equipment on site will include: residue compressor engines (Either ENG 5-8 or ENG 9-12), two generator engines (GEN 1-2 operating less than 500 hours), one 50 MMBtu/hr hot oil heater (HTR-1), and one 11 MMBtu/hr regen gas heater (HTR-2).

2.0 Description of this Modification:

The application and accompanying material revise the New Source Review (NSR) Construction Permit No. 7482 for the 3Bear Libby Gas Plant (Libby), owned and operated by 3 Bear Delaware Operating – NM, LLC (3Bear). NSR Permit No. 7482 was issued on January 8, 2018.

Changes since the last permit issuance include: addition of residue compressor engine options, addition of generator engine, changes to the numbering of the tank units, removal of methanol tank, addition of loadout, update to increased fugitive emissions, as well as increased flaring volumes.

The facility will consist of one of the inlet compressor engine options listed in Table 1.

Table 1: Compressor Engine Options

Option No.	Unit Name	Make & Model
1	ENG-1	Caterpillar G3508
2	ENG 2	Caterpillar G3516

Note: The worst-case emissions are included in the total facility emissions.

The facility will consist of one of the residue compressor engine options listed in Table 2.

Table 2: Compressor Engine Options

Option No.	Unit Name	Make & Model
1	ENG 5-8	Caterpillar G3516
2	ENG 9-12	Waukesha 7044GSI

Note: The worst-case emissions are included in the total facility emissions.

In addition to the compressor engine options, the facility will consist of the following emission units: two additional inlet compressor engines, one gunbarrel tank, four condensate tanks, one slop oil tank, one produced water tank, one hot oil heater, one regen gas heater, one amine unit, one condensate loadout, one oil loadout, one thermal oxidizer, one upset/maintenance flare, one

tank flare, process piping fugitives, and haul road fugitives. The facility will also have two generators (GEN 1-2) on site that are exempt under 20.2.72.202.B.3.

SSM Overview:

SSM emissions are expected at the facility and are included in the total facility wide emissions. The compressor blowdowns and plant blowdowns will be controlled by the maintenance flare. Additional maintenance flaring has been included in the application to account for other maintenance activities. Maintenance activities that cannot be controlled, such as painting and tank degassing, have been included in the application as well. An estimated 10 tpy has been used for these uncontrolled maintenance activities. In the event that the thermal oxidizer is down, the maintenance flare (FL-1) is used as a backup control device for the amine unit.

3.0 **Source Determination:**

1. The emission sources evaluated include the entire 3 Bear Libby Gas Plant.

2. Single Source Analysis:

A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? Yes

B. Common Ownership or Control: Are the facilities under common ownership or control? Yes

C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes

3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? Yes

4.0 **PSD Applicability:**

A. The source, as determined in 3.0 above, is a minor source before and after this modification. Note: CO and SO₂ emissions are close to PSD level. Calculations were thoroughly reviewed. Amine unit and thermal oxidizer included a 25% safety factor.

5.0 **History (In descending chronological order, showing NSR and TV):** *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
7482M1*	TBD	NSR - Significant Revision	Addition of residue compressor engine options (Waukesha), addition of generator engine (exempt under 20.2.72.202.B.3), changes to the numbering of the tank units, removal of methanol tank, addition of loadout, update to increased fugitive emissions, as well as increased flaring volumes.
P285	10/31/2019	Title V - New	Initial operating permit application Ruled Incomplete due to concurrent review of NSR permit.
7482	1/8/2018	NSR - New	Permitting for new 60MMscfd natural gas plant.

6.0 **Public Response/Concerns:** Comments were received from WildEarth Guardians, via e-mail, on January 17, 2020. A copy of the comments can be found in the Administrative Record (file folder), as well as Tempo. The Draft Permit, Statement of Basis, and Database Summary were published on the AQB web-site “Permitting Actions with Public Interest” January 21, 2020. The first AQB citizen letter was sent to WildEarth Guardians on January 30, 2010. The second AQB citizen letter, including notification of Department analysis availability on the web-site, was sent March 5, 2020. A second letter from WildEarth Guardians was received on March 27, 2020. The AQB final citizen letter was sent to WildEarth Guardians on April 8, 2020.

7.0 **Compliance Testing:**

Unit No.	Test Description	Test Date
ENG-5 (Previously ENG-1b)	Tested in accordance with EPA test methods as required by NSR permit 7482.	4/16/2019
ENG-6 (Previously ENG-2)	Tested in accordance with EPA test methods as required by NSR permit 7482.	4/18/2019

8.0 **Startup and Shutdown:**

- A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? No.
- B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes.
- C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes.
- D. Does the facility have emissions due to routine or predictable startup, shutdown,

and maintenance? If so, have all emissions from startup, shutdown, and scheduled maintenance operations been permitted? Yes.

9.0 **Compliance and Enforcement Status:** There are no known outstanding compliance or enforcement cases or actions in process or pending.

10.0 **Modeling:** Modeling review provided by AQB Modeler Angela Raso on February 7, 2020 states the following: *“This modeling analysis demonstrates that operation of the facility described in this report neither causes nor contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NM/NAAQS for CO, NO₂, PM₁₀, PM_{2.5}, and SO₂; and Class II PSD increments for NO₂, PM_{2.5}, PM₁₀, and SO₂.”*

Note: Modeling assumptions include engine options as stated in permit conditions.

11.0 **State Regulatory Analysis(NMAC/AOCR):**

<u>STATE REGULATIONS</u> CITATION 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	JUSTIFICATION:
2.1	GENERAL PROVISIONS	Yes	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	Yes	Entire Facility	NSR: 20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.
2.7	Excess Emissions	Yes	Entire Facility	Applies to all facilities' sources
2.33	Gas Burning Equipment - Nitrogen Dioxide	No		This facility DOES NOT have new gas burning equipment (external combustion emission sources, such as gas and oil-fired boilers and heaters) having a heat input of greater than 1,000,000 million British Thermal Units per year per unit. This facility DOES NOT have existing gas burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit Note: "New gas burning equipment" means gas burning equipment, the construction or modification of which is commenced after February 17, 1972.

<u>STATE REGULATIONS</u> CITATION 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	JUSTIFICATION:
2.34	Oil Burning Equipment - Nitrogen Dioxide	No		This facility DOES NOT have oil burning equipment (external combustion emission sources, such as gas and oil-fired boilers and heaters) having a heat input of greater than 1,000,000 million British Thermal Units per year per unit.
2.35	Natural Gas Processing Plant – Sulfur	No		This facility is a natural gas processing plant but DOES NOT have a Sulfur Recovery Unit to reduce sulfur emissions.
2.38	Hydrocarbon Storage Facilities	Yes	TK 2-6	20.2.38 NMAC This regulation applies to oil and condensate storage tanks at the facility. The tanks will be manifold to a flare to meet the requirements of this regulation.
2.39	Sulfur Recovery Plant - Sulfur	No		This facility is NOT a sulfur recovery plant.
2.61	Smoke and Visible Emissions	Yes	ENG 1-12, HTR 1-2, TO-1, FL 1-2 GEN-1, 2	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares. Generators are back up units exempt under 20.2.72.202.B.3.
2.70	Operating Permits	Yes	Entire Facility	This facility is a Title V Major Source as defined at 20.2.70.7 NMAC.
2.71	Operating Permit Fees	Yes	Entire Facility	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Yes	Entire Facility	NSR Permits are the applicable requirement, including 20.2.72 NMAC.
2.73	NOI & Emissions Inventory Requirements	Yes	Entire Facility	Emissions Inventory Reporting: 20.2.73.300 NMAC applies. This facility will be issued a permit under 20.2.72 NMAC, therefore it will meet the applicability requirements of 20.2.73.300 NMAC.
2.74	Permits-Prevention of Significant Deterioration	No		This facility is NOT a PSD major source.
2.75	Construction Permit Fees	Yes	Entire Facility	This facility is subject to 20.2.72 NMAC .

<u>STATE REGULATIONS</u> CITATION 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	JUSTIFICATION:
2.77	New Source Performance	Yes	ENG 1-12, HTR 1-2, FUG-1, COMP, AMINE-1 GEN-1, 2	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60. HTR 1-2 are subject to NSPS Dc ENG 1-12 (potentially) and GEN-1 are subject to NSPS Subpart JJJJ. GEN-2 is subject to NSPS Subpart IIII FUG-1, COMP, AMINE-1 are subject to NSPS Subpart OOOOa. Generators are back up units exempt under 20.2.72.202.B.3.
2.78	Emissions Standards for HAPs	No		This facility DOES NOT emit hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61. PTE for total HAPs is 15.7 tpy.
2.79	Permits Nonattainment Areas	No		This facility is not located in, not does it affect, a nonattainment area.
2.80	Stack Heights	Yes	ENG 1-12 HTR 1-2, TO-1, FL-1, FL-2	3 Bear considered GEP requirements in the analysis. Stack heights do not exceed GEP (40 CFR 51).
2.82	MACT Standards for Source Categories of HAPs	Yes	ENG 1-12 GEN 1-2	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63. Generators are back up units exempt under 20.2.72.202.B.3.

12.0 **Federal Regulatory Analysis:**

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Yes	Entire Facility	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.
NSPS Subpart A (40 CFR 60)	General Provisions	Yes	ENG 1-12, HTR 1-2, FUG-1, COMP, AMINE-1 GEN 1-2	Applies if any other subpart applies. HTR 1-2 are subject to NSPS Dc ENG 1-12 (potentially) are subject to NSPS Subpart JJJJ. FUG-1, COMP, AMINE-1 are subject to NSPS Subpart OOOOa. Generators are back up units exempt under 20.2.72.202.B.3.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional	Yes	HTR 1-2	Facility has steam generating units for which construction, modification or reconstruction is commenced after June 9, 1989 and that have a

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
	Steam Generating Units			maximum design heat input capacity of 29 MW) (100 million British thermal units per hour (MMBtu/h) or less, but greater than or equal to 2.9 MW. This regulation applies to the specified heaters
40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	No		This facility does not have storage capacity greater than 151,416 liters (40,000 gallons) that are used to store petroleum liquids for which construction is commenced after May 18, 1978, therefore the regulation is not applicable to this facility.
40 CFR 60, Subpart Kb	Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	No		The facility does not have storage vessels with storage capacity greater than 75m ³ that are used to store volatile organic liquids and for which construction, reconstruction, or modification commenced after 7/23/84, therefore the facility is not applicable to this regulation.
40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No		There are no stationary gas turbines exceeding the 10 MMBtu/hour threshold at this facility.
40 CFR 60, Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	No		This facility is an onshore gas plant that will commence construction, reconstruction, or modification after August 23, 2011, therefore the facility is not subject to the requirements of this subpart.
40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO2 Emissions	No		This facility is an onshore natural gas processing plant that will commence construction, reconstruction, or modification after August 23, 2011, therefore the facility is not subject to the requirements of this subpart.
40 CFR Part 60 Subpart III (Quad-I)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Yes	GEN-2	GEN-2 is a stationary CI that commenced construction after July 11, 2005 where the stationary CI ICE was manufactured after April 1, 2006. GEN-2 unit is exempt under 20.2.72.202.B.3.
40 CFR Part 60 Subpart JJJ (Quad -J)	Standards of Performance for Stationary Spark. Ignition Internal Combustion Engines	Yes	ENG 1-12, GEN-1	ENG-1 (potentially) is subject to NSPS Subpart JJJ because the engine has a manufacture date after July 1, 2007 and has a maximum engine power greater than or equal to 500 hp and less than 1,350 hp.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				<p>ENG 2-12 (potentially) are subject to NSPS Subpart JJJJ because the engines have a manufacture date after July 1, 2007 and have a maximum engine power greater than 500 hp.</p> <p>GEN-1 is subject to NSPS Subpart JJJJ because the engine has a manufacture date after July 1, 2008 and has a maximum engine power less than 500 hp.</p> <p>GEN-1 unit is exempt under 20.2.72.202.B.3.</p>
40 CFR Part 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines	No		There are no stationary gas turbines exceeding 10 MMBtu/hour at this facility.
NSPS 40 CFR Part 60 Subpart OOOO (Quad -O)	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	No		The facility is NOT subject to the provisions of NSPS Subpart OOOO because the facility will be constructed after September 18, 2015.
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	Yes	FUG-1, COMP, AMINE-1	<p>The facility IS subject to the provisions of NSPS Subpart OOOOa listed below because:</p> <ul style="list-style-type: none"> - The compressors (COMP) are not co-located with a wellhead, so the reciprocating compressor requirements are applicable. - AMINE-1 is a sweetening unit located at onshore natural gas processing plants that process natural gas produced from onshore wells. - This is an onshore natural gas processing plant therefore the equipment-leak standards apply to the affected facilities (FUG 1). <p>The facility is NOT subject to the provisions of NSPS Subpart OOOOa listed below because:</p> <ul style="list-style-type: none"> - There are no gas-fired, continuous high bleed pneumatic controllers at this site, so the pneumatic controller requirements are not applicable. - TK-1 is a process vessel not a storage vessel, therefore the storage vessel affected facility requirements are not applicable.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				<ul style="list-style-type: none"> - TK 2-6 and PWTK-1 are storage vessels that emit less than 6 tpy VOC, therefore the storage vessel affected facility requirements are not applicable. - OOOOa is not applicable to FUG-2 based on the residue side of the operation which does not have VOC wt% greater than 10%, 60.5400a(f)
NESHAP Subpart A (40 CFR 61)	General Provisions	No		This facility does not emit HAP's in quantities that trigger these requirements.
MACT Subpart A (40 CFR 63)	General Provisions	Yes	ENG 1-12 GEN 1-2	Applies if any other subpart applies. This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63. The MACT Subpart ZZZZ applies as discussed below.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	No		AREA SOURCE (Minor for HAPs): There are no affected sources (TEG glycol dehydrators, 63.760(b)(2)) at this facility.
40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities	No		This facility is not a natural gas transmission and storage facility or a major source of HAPs.
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	ENG 1-12 GEN 1-2	<p>40 CFR 63, Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from existing, new, modified and reconstructed stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. The regulation contains provisions for initial and continuous compliance demonstration. The facility is an area source of HAP, as defined under the regulation.</p> <p>ENG 1-12 (potentially) and GEN-1:</p> <p>Under §63.6590(a)(2)(iii) and (a)(3)(iii), a RICE located at an area source of HAP is a <i>new</i> or <i>reconstructed</i> unit if it is constructed or reconstructed on or after June 12, 2006. Under §63.6590(c)(1), a <i>new</i> or <i>reconstructed</i> SI RICE at an area source of HAP must meet the requirements of the part by meeting the requirements of 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines).</p>

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				<p>GEN-2 Under §63.6590(a)(2)(iii) and (a)(3)(iii), a RICE located at an area source of HAP is a <i>new</i> or <i>reconstructed</i> unit if it is constructed or reconstructed on or after June 12, 2006. Under §63.6590(c)(1), a <i>new</i> or <i>reconstructed</i> SI RICE at an area source of HAP must meet the requirements of the part by meeting the requirements of 40 CFR 60, Subpart IIII (NSPS for Stationary Compression Ignition Engines).</p> <p>Generators are back up units exempt under 20.2.72.202.B.3.</p>
40 CFR 64	Compliance Assurance Monitoring	No		<p>The amine sweetening unit has pre-control VOC and H2S emissions greater than 100 TPY and uses a control device to achieve compliance with an emission limitation or standard.</p> <p>The amine sweetening unit is an affected facility under NSPS OOOOa, therefore, it is exempt under §64.2(b)(1)(i) for control of H2S. The facility is not subject to 40 CFR 64.</p>
40 CFR 68	Chemical Accident Prevention	Yes	Entire Facility	<p>An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115 Threshold determination and 68.130 List of substances. This facility will handle naturally occurring hydrocarbon mixtures at a natural gas processing plant and the Accidental Release Prevention Provisions may be applicable to this facility. The facility may be required to submit the appropriate accidental release emergency response program plan prior to operation of the facility with more than the threshold quantity of a regulated substance.</p>
40 CFR 70	Title V- State Operating Permit Programs	No		<p>Operating Permit Program – is not applicable – New Mexico State has full delegated authority and Title V is administered under 20.2.70 NMAC.</p>
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No		<p>Not Applicable –facility will not “service”, “maintain” or “repair” class I or class II appliances nor “disposes” of the appliances.</p>

13.0 **Exempt and/or Insignificant Equipment that do not require monitoring:**

NSR Exempt Equipment

Source Description	JUSTIFICATION
Miscellaneous Insignificant Tanks	Activity has a potential emission rate of no more than one-half (1/2) ton per year of any pollutant set by national or New Mexico ambient air quality standards, 20.2.72.202.B.5
Olympian-Generator Engine (GEN-1)	Stand by generator operated less than 500 hour per year and accompanied by sufficient record keeping, to verify that it is operated less than 500 hours per year, 20.2.72.202.B.3
Generac-Generator Engine (GEN-2)	Standby generator operated less than 500 hour per year and accompanied by sufficient record keeping, to verify that it is operated less than 500 hours per year, 20.2.72.202.B.3

14.0 **New/Modified/Unique Conditions (Format: Condition#: Explanation):**

- A. Date of Engine Monitoring Protocols used: December 11, 2019.
- B. Date of Flare Monitoring Protocols used: July 12, 2017.
- C. Date of VOC/HAPS LDAR Fugitive Monitoring Protocols used: September 15, 2017.
- D. Date of Gas-Fired Heaters, Furnaces and Boilers Monitoring Protocols used: August 18, 2017.
- E. Date of Tanks & Loading Monitoring Protocols used: September 19, 2017.

15.0 **For Title V action: Cross Reference Table between NSR Permit 7482-M1 and TV Permit P285 . NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:**

Not Required, P285 has not been issued.

16.0 **Permit specialist's notes to other NSR or Title V permitting staff concerning changes and updates to permit conditions.**

- A. Section A201 of NSR permit 7482-M1 was updated to reflect current Engine Monitoring Protocols. The following conditions were added to this section: Non-Selective Catalytic Reduction Operation (C), Notification of Engine Option Installation (E), 40 CFR 60, Subpart JJJJ (F), 40 CFR 60, Subpart ZZZZ (G), and 40 CFR 60, Subpart IIII (H).
- B. GEN-1 and GEN-2 are exempted equipment under 20.2.72.202.B.3. Although exempt equipment it is not regulated under the NSR permit, GEN-1 and GEN-2 will be subject to TV regulations. Per consultant approval, the generators were added to Tables A.103 and A.104, and Section A.201 of the NSR permit.
- C. Revised section A202 to reflect correction of tank configuration and process. The new application resulted in changes to the numbering of the tank units deferring from previous permit.