



MICHELLE LUJAN GRISHAM  
GOVERNOR

HOWIE C. MORALES  
LT. GOVERNOR

New Mexico  
**ENVIRONMENT DEPARTMENT**

525 Camino de los Marquez, Suite 1  
Santa Fe, NM 87505  
Phone (505) 476-4300  
Fax (505) 476-4375  
www.env.nm.gov



JAMES C. KENNEY  
CABINET SECRETARY

JENNIFER J. PRUETT  
DEPUTY SECRETARY

**AIR QUALITY BUREAU**  
**NEW SOURCE REVIEW PERMIT**  
Issued under 20.2.72 NMAC

Note to Applicant for Draft Permit Reviews: **The AQB permit specialist provides this draft permit to the applicant as a courtesy to assist AQB with developing practically enforceable permit terms & conditions and correcting any technical errors. Please note that the draft permit may change following completion of the Department's internal reviews. If AQB makes additional changes, and as time allows, the applicant may be provided an opportunity for additional review before the permit is issued.**

Certified Mail No:  
Return Receipt Requested

**NSR Permit No:** PSD-8245  
**Facility Name:** Husky Gas Plant and Central Delivery Point

**Facility Owner/Operator:** XTO Energy Inc.  
**Mailing Address:** 22777 Springwood Village Parkway  
W4.6B.355  
Spring, TX 77389

**TEMPO/IDEA ID No:** 38899-PRN20190002  
**AIRS No:** 35 0152102

**Permitting Action:** PSD New Permit  
**Source Classification:** PSD Major, TV Major

**Facility Location:** 603,290 m E by 3,587,810 m N, Zone 13;  
Datum WGS84

**County:** Eddy County

**Air Quality Bureau Contact** James E. Nellessen  
**Main AQB Phone No.** (505) 476-4300

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**Liz Bisbey-Kuehn**  
**Bureau Chief**

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**Date**

**Air Quality Bureau**

**[Delete all below at time final permit submitted for signature.]**

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**PART B GENERAL CONDITIONS (Attached)**

**PART C MISCELLANEOUS: Supporting On-Line Documents; Definitions; Acronyms (Attached)**

**PART A FACILITY SPECIFIC REQUIREMENTS**

**A100 Introduction**

- A. This is a new permit.
- B. This permit includes Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) requirements that were imposed in accordance with the PSD permit regulation 20.2.74 NMAC. Any removal or revision of any BACT requirement(s) must first be approved by the Department through an appropriate new source review permit application that includes a BACT re-evaluation consistent with 20.2.74 NMAC.

**A101 Permit Duration (expiration)**

- A. The term of this permit is permanent unless withdrawn or cancelled by the Department.

**A102 Facility: Description**

- A. The function of the facility will serve as a natural gas processing plant and oil/natural gas liquid (NGL) central delivery point (CDP). The facility will be designed to accommodate three (3) cryogenic (cryo) trains. In addition to gas processing the CDP portion of the facility will receive up to 200,000 barrels of oil/condensate (oil) per day from surrounding field production batteries. Oil will be transferred offsite through pipeline. The operator is also planning the construction of four (4) Cogen turbines to provide power and auxiliary heat to the facility.
- B. This facility will be located approximately 13.9 miles NE of Loving, New Mexico in Eddy County.
- C. Tables 102.A and Table 102.B show the total potential emission rates (PER) from this facility for information only. This is not an enforceable condition and excludes emissions from Minor NSR exempt activities per 20.2.72.202 NMAC.

**Table 102.A: Total Potential Emission Rate (PER) from Entire Facility**

| <b>Pollutant</b>  | <b>Emissions (tons per year)</b> |
|---|----------------------------------|
| Nitrogen Oxides (NO <sub>x</sub> )                        | 256.7                            |
| Carbon Monoxide (CO)                                      | 225.8                            |
| Volatile Organic Compounds (VOC) <sup>1</sup>             | 741.9                            |
| Sulfur Dioxide (SO <sub>2</sub> )                         | 51.2                             |
| Particulate Matter 10 microns or less (PM <sub>10</sub> ) | 175.7                            |

**Table 102.A: Total Potential Emission Rate (PER) from Entire Facility**

| Pollutant   | Emissions (tons per year) |
|---|---------------------------|
| Particulate Matter (PM) <sup>2</sup>                        | 182.3                     |
| Particulate Matter 2.5 microns or less (PM <sub>2.5</sub> ) | 173.7                     |
| Greenhouse Gas (GHG) as CO <sub>2</sub> e                   | 2,664,709                 |

1. VOC total includes emissions from Fugitives, SSM and Malfunctions.
2. PM is a regulated new source review pollutant per 20.2.74 NMAC Prevention of Significant.

**Table 102.B: Total Potential Emissions Rate (PER) for Hazardous Air Pollutants (HAPs)<sup>1</sup> and New Mexico Toxic Air Pollutants (TAPs)<sup>2</sup> that exceed 1.0 ton per year**

| Pollutant                  | Emissions (tons per year) |
|----------------------------|---------------------------|
| Benzene <sup>1</sup>       | 1.2                       |
| Formaldehyde <sup>1</sup>  | 4.6                       |
| n-Hexane <sup>1</sup>      | 11.0                      |
| Toluene <sup>1</sup>       | 2.1                       |
| Total HAPs <sup>3</sup>    | 25.3                      |
| Ammonia <sup>2</sup>       | 277.9                     |
| Sulfuric acid <sup>2</sup> | 14.4                      |

- 1 – HAP emissions are already included in the VOC emission total.
- 2 – TAP (state toxic air pollutant per 20.2.72.502 NMAC).
- 3 – The total HAP emissions may not agree with the sum of individual HAPs because only individual HAPs greater than 1.0 tons per year are listed here.

**A103 Facility: Applicable Regulations**

- A. The permittee shall comply with all applicable sections of the requirements listed in Table 103.A.

**Table 103.A: Applicable Requirements**

| Applicable Requirements                     | Federally Enforceable | Unit No.  |
|---|-----------------------|---|
| 20.2.1 NMAC General Provisions              | X                     | Entire Facility   |
| 20.2.3 NMAC Ambient Air Quality Standards   | X                     | Entire Facility   |
| 20.2.7 NMAC Excess Emissions                | X                     | Entire Facility   |
| 20.2.38 NMAC Hydrocarbon Storage Facilities |                       | IFR1 to IFR4, and OTK1 to OTK7  |
| 20.2.61 NMAC Smoke and Visible Emissions    | X                     | SHTR1 to SHTR12, CHTR1 to CHTR3, RHTR1 to RHTR3, FL1 to FL3, ECD1, TO1 to TO3, TUR1 to TUR4, GEN1 to GEN8 |
| 20.2.70 NMAC Operating Permits              | X                     | Entire Facility   |
| 20.2.71 NMAC Operating Permit Emission Fees | X                     | Entire Facility   |

**Table 103.A: Applicable Requirements**

| <b>Applicable Requirements</b>   | <b>Federally Enforceable</b> | <b>Unit No.</b>  |
|--|------------------------------|--|
| 20.2.72 NMAC Construction Permit   | X                            | Entire Facility  |
| 20.2.73 NMAC Notice of Intent and Emissions Inventory Requirements                         | X                            | Entire Facility  |
| 20.2.74 NMAC Permits – Prevention of Significant Deterioration (PSD)                       | X                            | Entire Facility  |
| 20.2.75 NMAC Construction Permit Fees  | X                            | Entire Facility  |
| 20.2.77 NMAC New Source Performance Standards  | X                            | Units subject to 40 CFR 60   |
| 20.2.82 NMAC Maximum Achievable Control Technology Standards for Source Categories of HAPs | X                            | Units subject to 40 CFR 63   |
| 40 CFR 50 National Ambient Air Quality Standards   | X                            | Entire Facility  |
| 40 CFR 60, Subpart A, General Provisions   | X                            | See units subject to specific Subparts of 40 CFR 60  |
| 40 CFR 60.40b, Subpart Db  | X                            | CHTR1 to CHTR3   |
| 40 CFR 60.40c, Subpart Dc  | X                            | SHTR1 to SHTR12, and RHTR1 to RHTR3  |
| 40 CFR 60, Subpart Kb  | X                            | IFR1 to IFR4   |
| 40 CFR 60, Subpart JJJJ  | X                            | GEN1 to GEN8   |
| 40 CFR 60, Subpart KKKK  | X                            | TUR1 to TUR4   |
| 40 CFR 60, Subpart OOOOa   | X                            | FUG, ESTCOMP1 to ESTCOMP17, EIACOMP1 to EIACOMP5, CRYO1 to CRYO3, MOL1 to MOL3, AU1 to AU3, and GBS1 |
| 40 CFR 63, Subpart A, General Provisions   | X                            | See units subject to specific Subparts of 40 CFR 63  |
| 40 CFR 63, Subpart DDDDD   | X                            | SHTR1 to SHTR12, RHTR1 to RHTR3, and CHTR1 to CHTR3  |
| 40 CFR 63, Subpart HH  | X                            | OTK1 to OTK7, PWTK1 to PWTK2, and GBS1   |
| 40 CFR 63, Subpart YYYYY   | X                            | TUR1 to TUR4   |
| 40 CFR 63, Subpart ZZZZ  | X                            | GEN1 to GEN8   |
| 40 CFR 64, Compliance Assurance Monitoring (CAM)   | X                            | TUR1 to TUR4, AU1 to AU3, OTK1 to OTK7, GBS1, ECD1, TO1 to TO3                                       |

**A104 Facility: Regulated Sources**

- A. Table 104.A lists the emission units authorized for this facility. Emission units identified as exempt activities (as defined in 20.2.72.202 NMAC) and/or equipment not regulated pursuant to the Act are not included.

**Table 104.A: Regulated Sources List**

| Unit No.         | Source Description                           | Make         | Model                               | Serial No. | Construction/Reconstruction Date | Manufacture Date | Manufacturer Rated Capacity /Permitted Capacity |
|------------------|--|--------------|-------------------------------------|------------|----------------------------------|------------------|---|
| AU1              | Amine Unit 1                                 | TBD          | NA                                  | TBD        | TBD                              | TBD              | 250 MM SCF/d / 250 MM SCF/d                     |
| AU2              | Amine Unit 2                                 | TBD          | NA                                  | TBD        | TBD                              | TBD              | 250 MM SCF/d / 250 MM SCF/d                     |
| AU3              | Amine Unit 3                                 | TBD          | NA                                  | TBD        | TBD                              | TBD              | 250 MM SCF/d / 250 MM SCF/d                     |
| CHTR1            | Cryo Hot Oil Heater                          | THM          | NA                                  | TBD        | TBD                              | TBD              | 103.99 MM BTU/h / 103.99 MM BTU/h               |
| CHTR2            | Cryo Hot Oil Heater                          | THM          | NA                                  | TBD        | TBD                              | TBD              | 103.99 MM BTU/h / 103.99 MM BTU/h               |
| CHTR3            | Cryo Hot Oil Heater                          | THM          | NA                                  | TBD        | TBD                              | TBD              | 103.99 MM BTU/h / 103.99 MM BTU/h               |
| CRYO 1-3         | 3 Cryogenic Trains                           | NA           | NA                                  | NA         | TBD                              | TBD              | /   |
| ECD1             | Combustor (enclosed combustion device)       | Zeeco Inc    | NA                                  | TBD        | TBD                              | TBD              | 45,682 SCF/h / 45,682 SCF/h                     |
| EIACO MP 1-5     | 5 Electric-driven Instrument Air Compressors | NA           | NA                                  | NA         | TBD                              | TBD              | /   |
| ESTCO MP 1-17    | 17 Electric-driven Stabilizer Compressors    | NA           | NA                                  | NA         | TBD                              | TBD              | /   |
| FL1              | SSM/Emergency Flare 1 (dual tip)             | Zeeco Inc    | Continuous pilot                    | TBD        | TBD                              | TBD              | 250 MM SCF/d / 250 MM SCF/d                     |
| FL2              | SSM/Emergency Flare 2 (dual tip)             | Zeeco Inc    | Continuous pilot                    | TBD        | TBD                              | TBD              | 250 MM SCF/d / 250 MM SCF/d                     |
| FL3              | Backup SSM/Emergency Flare 3 (dual tip)      | Zeeco Inc    | Spark ignited – no continuous pilot | TBD        | TBD                              | TBD              | 250 MM SCF/d / 250 MM SCF/d                     |
| FL1-FL3 CRYO-SSM | FL1-FL3 Cryo Blowdown SSM Gas                | Zeeco Inc    | NA                                  | TBD        | TBD                              | TBD              | 0.38 MM SCF/d / 0.38 MM SCF/d                   |
| FL1-FL3 OVHD-SSM | FL1-FL3 Stabilizer Overhead SSM Gas          | Zeeco Inc    | NA                                  | TBD        | TBD                              | TBD              | 1.2 MM SCF/d / 1.2 MM SCF/d                     |
| FUG              | Fugitives                                    | NA           | NA                                  | NA         | TBD                              | NA               | /   |
| GBS1             | Gunbarrel Tank                               | Advance Tank | NA                                  | TBD        | TBD                              | TBD              | 1000 bbl / 153,738.54 M gal/y                   |
| GEN1             | Emergency Generator (4SLB)                   | Caterpillar  | G3520H                              | TBD        | TBD                              | TBD              | 3448 hp / 1500 rpm                              |

**Table 104.A: Regulated Sources List**

| Unit No. | Source Description            | Make         | Model  | Serial No. | Construction/ Reconstruction Date | Manufacture Date | Manufacturer Rated Capacity /Permitted Capacity |
|----------|-------------------------------|--------------|--------|------------|-----------------------------------|------------------|---|
| GEN2     | Emergency Generator (4SLB)    | Caterpillar  | G3520H | TBD        | TBD                               | TBD              | 3448 hp / 1500 rpm                              |
| GEN3     | Emergency Generator (4SLB)    | Caterpillar  | G3520H | TBD        | TBD                               | TBD              | 3448 hp / 1500 rpm                              |
| GEN4     | Emergency Generator (4SLB)    | Caterpillar  | G3520H | TBD        | TBD                               | TBD              | 3448 hp / 1500 rpm                              |
| GEN5     | Emergency Generator (4SLB)    | Caterpillar  | G3520H | TBD        | TBD                               | TBD              | 3448 hp / 1500 rpm                              |
| GEN6     | Emergency Generator (4SLB)    | Caterpillar  | G3520H | TBD        | TBD                               | TBD              | 3448 hp / 1500 rpm                              |
| GEN7     | Emergency Generator (4SLB)    | Caterpillar  | G3520H | TBD        | TBD                               | TBD              | 3448 hp / 1500 rpm                              |
| GEN8     | Emergency Generator (4SLB)    | Caterpillar  | G3520H | TBD        | TBD                               | TBD              | 3448 hp / 1500 rpm                              |
| IFR1     | Oil Storage 1                 | Advance Tank | NA     | TBD        | TBD                               | TBD              | 100,000 bbl / 766,500 M gal/y                   |
| IFR2     | Oil Storage 2                 | Advance Tank | NA     | TBD        | TBD                               | TBD              | 100,000 bbl / 766,500 M gal/y                   |
| IFR3     | Oil Storage 3                 | Advance Tank | NA     | TBD        | TBD                               | TBD              | 100,000 bbl / 766,500 M gal/y                   |
| IFR4     | Oil Storage 4                 | Advance Tank | NA     | TBD        | TBD                               | TBD              | 100,000 bbl / 766,500 M gal/y                   |
| MOL1-3   | 3 Molecular Sieve Dehydrators | NA           | NA     | NA         | TBD                               | TBD              | /   |
| OTK1     | 3rd Party Oil Storage 1       | Advance Tank | NA     | TBD        | TBD                               | TBD              | 2000 bbl / 63,875.01 M gal/y                    |
| OTK2     | 3rd Party Oil Storage 2       | Advance Tank | NA     | TBD        | TBD                               | TBD              | 2000 bbl / 63,875.01 M gal/y                    |
| OTK3     | 3rd Party Oil Storage 3       | Advance Tank | NA     | TBD        | TBD                               | TBD              | 2000 bbl / 63,875.01 M gal/y                    |
| OTK4     | 3rd Party Oil Storage 4       | Advance Tank | NA     | TBD        | TBD                               | TBD              | 2000 bbl / 63,875.01 M gal/y                    |
| OTK5     | 3rd Party Oil Storage 5       | Advance Tank | NA     | TBD        | TBD                               | TBD              | 2000 bbl / 63,875.01 M gal/y                    |
| OTK6     | 3rd Party Oil Storage 6       | Advance Tank | NA     | TBD        | TBD                               | TBD              | 2000 bbl / 63,875.01 M gal/y                    |
| OTK7     | Slop Oil Tank                 | Advance Tank | NA     | TBD        | TBD                               | TBD              | 500 bbl / 31,895.36 M gal/y                     |
| OTL      | Slop Oil Loading              | NA           | NA     | NA         | TBD                               | NA               | 210 bbl/d / 210 bbl/d                           |
| PWTK1    | Produced Water Tank 1         | Advance Tank | NA     | TBD        | TBD                               | TBD              | 750 bbl / 76,869.27 M gal/y                     |

**Table 104.A: Regulated Sources List**

| Unit No. | Source Description           | Make         | Model | Serial No. | Construction/ Reconstruction Date | Manufacture Date | Manufacturer Rated Capacity /Permitted Capacity |
|----------|------------------------------|--------------|-------|------------|-----------------------------------|------------------|---|
| PWTK2    | Produced Water Tank 2        | Advance Tank | NA    | TBD        | TBD                               | TBD              | 750 bbl / 76,869.27 M gal/y                     |
| PWTL     | Produced Water Loading       | NA           | NA    | NA         | TBD                               | NA               | 10,308 bbl/d / 10,308 bbl/d                     |
| ROAD     | Haul Road Fugitives          | NA           | NA    | NA         | TBD                               | NA               | /   |
| RHTR1    | Regen Heater                 | THM          | NA    | TBD        | TBD                               | TBD              | 39.14 MM BTU/h / 39.14 MM BTU/h                 |
| RHTR2    | Regen Heater                 | THM          | NA    | TBD        | TBD                               | TBD              | 39.14 MM BTU/h / 39.14 MM BTU/h                 |
| RHTR3    | Regen Heater                 | THM          | NA    | TBD        | TBD                               | TBD              | 39.14 MM BTU/h / 39.14 MM BTU/h                 |
| SHTR1    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR2    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR3    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR4    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR5    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR6    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR7    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR8    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR9    | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR10   | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR11   | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SHTR12   | Stabilization Hot Oil Heater | THM          | NA    | TBD        | TBD                               | TBD              | 64.83 MM BTU/h / 64.83 MM BTU/h                 |
| SSM      | Storage tank SSM emissions   | NA           | NA    | NA         | TBD                               | NA               | /   |
| TO1      | Thermal Oxidizer             | Zeeco Inc    | NA    | TBD        | TBD                               | TBD              | 31.5 MM BTU/h / 31.5 MM BTU/h                   |
| TO2      | Thermal Oxidizer             | Zeeco Inc    | NA    | TBD        | TBD                               | TBD              | 31.5 MM BTU/h / 31.5 MM BTU/h                   |

**Table 104.A: Regulated Sources List**

| Unit No. | Source Description | Make       | Model | Serial No. | Construction/ Reconstruction Date | Manufacture Date | Manufacturer Rated Capacity /Permitted Capacity |
|----------|--------------------|------------|-------|------------|-----------------------------------|------------------|---|
| TO3      | Thermal Oxidizer   | Zeeco Inc  | NA    | TBD        | TBD                               | TBD              | 31.5 MM BTU/h / 31.5 MM BTU/h                   |
| TUR1     | Turbine 1          | Mitsubishi | H-100 | TBD        | TBD                               | TBD              | 120 MW / 120 MW                                 |
| TUR2     | Turbine 2          | Mitsubishi | H-100 | TBD        | TBD                               | TBD              | 120 MW / 120 MW                                 |
| TUR3     | Turbine 3          | Mitsubishi | H-100 | TBD        | TBD                               | TBD              | 120 MW / 120 MW                                 |
| TUR4     | Turbine 4          | Mitsubishi | H-100 | TBD        | TBD                               | TBD              | 120 MW / 120 MW                                 |

1. All TBD (to be determined) units and like-kind engine replacements must be evaluated for applicability to NSPS and MACT requirements.

### **A105 Facility: Control Equipment including BACT**

- A. Table 105.A lists all the pollution control equipment required for this facility. Each emission point is identified by the same number that was assigned to it in the permit application.

**Table 105.A: Control Equipment List:**

| Control Equipment Unit No.          | Control Description   | Pollutant(s) being controlled                           | <sup>1,5</sup> Control for Unit Number(s) in Table 104 | Required for BACT   |
|-------------------------------------|---|---|--|---|
| CAT1 to CAT4                        | Selective Catalytic Reduction (SCR) for NO <sub>x</sub>   | NO <sub>x</sub> (83.7%)                                 | TUR1 to TUR4   | Yes   |
| CAT1 to CAT4                        | Oxidation for CO, VOC, and HAP  | CO (85.5%), VOC and HAP (36.1%)                         | TUR1 to TUR4   | Yes – CO and VOC<br>No – HAP                              |
| See control description             | GCP <sup>2</sup> and pipeline quality natural gas <sup>3</sup>  | SO <sub>x</sub> and H <sub>2</sub> SO <sub>4</sub>      | TUR1 to TUR4   | Yes   |
| See control description             | GCP and pipeline quality natural gas  | PM <sub>10</sub> , PM <sub>2.5</sub> , CO <sub>2e</sub> | TUR1 to TUR4   | Yes   |
| TO1 to TO3                          | Still Vent and Flash Tank emissions sent to Thermal Oxidizers 1, 2, and 3; 100% capture, 99% DRE <sup>4</sup> | VOC, HAP, CO <sub>2e</sub> , and H <sub>2</sub> S       | AU1 to AU3   | Yes – VOC, CO <sub>2e</sub><br>No – HAP, H <sub>2</sub> S |
| See control description             | Thermal Oxidizers 1, 2, and 3 (ultra-low NO <sub>x</sub> )  | NO <sub>x</sub>   | TO1 to TO3   | Yes   |
| GCP                                 | GCP   | CO and VOC  | TO1 to TO3   | Yes   |
| GCP                                 | GCP and pipeline quality natural gas  | CO <sub>2e</sub>  | TO1 to TO3   | Yes   |
| Low NO <sub>x</sub> burners and GCP | Low NO <sub>x</sub> burners and GCP   | NO <sub>x</sub>   | CHTR1 to CHTR3, RHTR1 to RHTR3, SHTR1 to SHTR12        | Yes   |

**Table 105.A: Control Equipment List:**

| <b>Control Equipment Unit No.</b> | <b>Control Description</b>   | <b>Pollutant(s) being controlled</b>   | <b><sup>1,5</sup>Control for Unit Number(s) in Table 104</b>                                | <b>Required for BACT</b>                                |
|-----------------------------------|--|--|---|---|
| GCP                               | GCP  | CO, VOC  | CHTR1 to CHTR3, RHTR1 to RHTR3, SHTR1 to SHTR12   | Yes   |
| See control description           | Pipeline quality natural gas   | SO <sub>x</sub>  | CHTR1 to CHTR3, RHTR1 to RHTR3, SHTR1 to SHTR12   | Yes   |
| See control description           | GCP and pipeline quality natural gas   | PM <sub>10</sub> , PM <sub>2.5</sub> , CO <sub>2e</sub>  | CHTR1 to CHTR3, RHTR1 to RHTR3, SHTR1 to SHTR12   | Yes   |
| ECD1                              | Fixed roof tanks; submerged fill pipe; vented to ECD1<br>100% Capture, 98% DRE                 | VOC, HAP, and CO <sub>2e</sub>   | GBS1, OTK1 to OTK7, PWTK1 to PWTK2  | Yes   |
| ECD1                              | Submerged loading and vented to ECD1<br>98% DRE  | VOC, HAP, and CO <sub>2e</sub>   | OTL and PWTL  | Yes   |
| GCP                               | GCP  | NO <sub>x</sub> , CO, and VOC  | ECD1  | Yes   |
| GCP                               | GCP and pipeline quality natural gas   | CO <sub>2e</sub>   | ECD1  | Yes   |
| FL1 to FL3                        | SSM maintenance activities; 100% Capture, 98% DRE  | VOC, CO <sub>2e</sub> , and H <sub>2</sub> S   | Cryo blowdown gas, Stabilizer overhead blowdown gas, and Facility-wide plant inlet shutdown | Yes – VOC and CO <sub>2e</sub><br>No – H <sub>2</sub> S |
| See control description           | GCP, pipeline quality natural gas for pilot/purge, limitations on flaring events, 40 CFR 60.18 | NO <sub>x</sub> , CO, VOC, PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , and CO <sub>2e</sub> | FL1 to FL3  | Yes   |
| See control description           | Floating roof design with mechanical/liquid primary and secondary seals, and submerged fill    | VOC and HAP  | IFR1 to IFR4  | Yes   |
| LDAR                              | LDAR (leak detection and repair) via NSPS OOOOa  | VOC and CO <sub>2e</sub>   | FUG   | Yes   |
| See control description           | Lean Burn Technology and GCP<br>Also meet 40 CFR 60, Subpart JJJ emission standards            | NO <sub>x</sub>  | GEN1 to GEN8  | Yes   |
| See control description           | GCP and pipeline quality natural gas<br>Operating hours limit                                  | CO, VOC, PM <sub>10</sub> , PM <sub>2.5</sub> , CO <sub>2e</sub>   | GEN1 to GEN8  | Yes   |

**Table 105.A: Control Equipment List:**

| Control Equipment Unit No. | Control Description                  | Pollutant(s) being controlled | <sup>1,5</sup> Control for Unit Number(s) in Table 104 | Required for BACT            |
|----------------------------|--------------------------------------|-------------------------------|--|------------------------------|
| See control description    | Pipeline quality natural gas         | SOx                           | GEN1 to GEN8   | Yes                          |
| See control description    | Base Course surface (60% PM control) | PM, PM10, PM2.5               | ROAD   | Yes – PM10, PM2.5<br>No - PM |

1. Control for unit number refers to a unit number from the Regulated Equipment List Table 104.A.
2. GCP means good combustion practices.
3. Pipeline quality natural gas for this permit means natural gas with no more than 0.75 gr total Sulfur/100 dscf after processing through the inlets, inlet separator, oil stabilization, and amine units to remove impurities. Applies to all combustion units.
4. DRE means destruction rate efficiency.
5. Controls for each unit are required under all operating scenarios.

**A106 Facility: Allowable Emissions**

- A. The following Section lists the emission units and their allowable emission limits. (40 CFR 50, 40 CFR 60, Subparts A, Db, Dc, Kb, JJJJ, KKKK, and OOOOa; 40 CFR 63, Subparts A, DDDDD, HH, YYYY, and ZZZZ; 20.2.72.210.A and B.1 NMAC).

**Table 106.A: Allowable PPH and TPY Emissions.<sup>2,3,4</sup>**

**Refer to Tables 106.B and 107.A for additional unit specific BACT Emission Limits.**

| Unit No.          | NO <sub>x</sub> <sup>1</sup> pph | NO <sub>x</sub> <sup>1</sup> tpy | CO pph | CO tpy | VOC pph | VOC tpy | SO <sub>2</sub> pph | SO <sub>2</sub> tpy | PM <sub>10</sub> pph | PM <sub>10</sub> tpy | PM <sub>2.5</sub> pph | PM <sub>2.5</sub> tpy | H <sub>2</sub> S (pph) | H <sub>2</sub> S (tpy) |
|-------------------|----------------------------------|----------------------------------|--------|--------|---------|---------|---------------------|---------------------|----------------------|----------------------|-----------------------|-----------------------|------------------------|------------------------|
| AU1               | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| AU2               | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| AU3               | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| CHTR <sub>1</sub> | 3.5                              | 15.2                             | 1.7    | 7.4    | 0.6     | 2.5     | 0.2                 | 1.0                 | 0.6                  | 2.8                  | 0.6                   | 2.8                   | -                      | -                      |
| CHTR <sub>2</sub> | 3.5                              | 15.2                             | 1.7    | 7.4    | 0.6     | 2.5     | 0.2                 | 1.0                 | 0.6                  | 2.8                  | 0.6                   | 2.8                   | -                      | -                      |
| CHTR <sub>3</sub> | 3.5                              | 15.2                             | 1.7    | 7.4    | 0.6     | 2.5     | 0.2                 | 1.0                 | 0.6                  | 2.8                  | 0.6                   | 2.8                   | -                      | -                      |
| ECD1              | 1.1                              | 4.3                              | 1.0    | 3.6    | 7.3     | 28.3    | 0.0                 | 0.0                 | 0.09                 | 0.1                  | 0.09                  | 0.1                   | -                      | -                      |
| FL1               | 1.3                              | 5.9                              | 2.7    | 11.7   | 0.4     | 1.8     | 1.6E-4              | 6.8E-4              | 0.07                 | 0.3                  | 0.07                  | 0.3                   | 1.7E-6                 | 7.3E-6                 |
| FL2               | 1.3                              | 5.9                              | 2.7    | 11.7   | 0.4     | 1.8     | 1.6E-4              | 6.8E-4              | 0.07                 | 0.3                  | 0.07                  | 0.3                   | 1.7E-6                 | 7.3E-6                 |

| Unit No.                       | NO <sub>x</sub> <sup>1</sup> pph | NO <sub>x</sub> <sup>1</sup> tpy | CO pph | CO tpy | VOC pph | VOC tpy | SO <sub>2</sub> pph | SO <sub>2</sub> tpy | PM <sub>10</sub> pph | PM <sub>10</sub> tpy | PM <sub>2.5</sub> pph | PM <sub>2.5</sub> tpy | H <sub>2</sub> S (pph) | H <sub>2</sub> S (tpy) |
|--------------------------------|----------------------------------|----------------------------------|--------|--------|---------|---------|---------------------|---------------------|----------------------|----------------------|-----------------------|-----------------------|------------------------|------------------------|
| FL3 alone                      | 0.0                              | 0.0                              | 0.0    | 0.0    | 0.0     | 0.0     | 0.0                 | 0.0                 | 0.0                  | 0.0                  | 0.0                   | 0.0                   | 0.0                    | 0.0                    |
| FL1-FL3 (pilot-purge combined) | 2.7                              | 11.7                             | 5.4    | 23.4   | 0.8     | 3.5     | 3.1E-4              | 1.4E-3              | 0.1                  | 0.6                  | 0.1                   | 0.6                   | 3.3E-6                 | 1.5E-5                 |
| FUG                            | -                                | -                                | -      | -      | *       | 388.2   | -                   | -                   | -                    | -                    | -                     | -                     | -                      | -                      |
| GBS1                           | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| GEN1                           | 3.8                              | 0.2                              | 11.4   | 0.6    | 1.8     | 0.1     | 0.05                | 0.0                 | 0.2                  | 0.01                 | 0.2                   | 0.01                  | -                      | -                      |
| GEN2                           | 3.8                              | 0.2                              | 11.4   | 0.6    | 1.8     | 0.1     | 0.05                | 0.0                 | 0.2                  | 0.01                 | 0.2                   | 0.01                  | -                      | -                      |
| GEN3                           | 3.8                              | 0.2                              | 11.4   | 0.6    | 1.8     | 0.1     | 0.05                | 0.0                 | 0.2                  | 0.01                 | 0.2                   | 0.01                  | -                      | -                      |
| GEN4                           | 3.8                              | 0.2                              | 11.4   | 0.6    | 1.8     | 0.1     | 0.05                | 0.0                 | 0.2                  | 0.01                 | 0.2                   | 0.01                  | -                      | -                      |
| GEN5                           | 3.8                              | 0.2                              | 11.4   | 0.6    | 1.8     | 0.1     | 0.05                | 0.0                 | 0.2                  | 0.01                 | 0.2                   | 0.01                  | -                      | -                      |
| GEN6                           | 3.8                              | 0.2                              | 11.4   | 0.6    | 1.8     | 0.1     | 0.05                | 0.0                 | 0.2                  | 0.01                 | 0.2                   | 0.01                  | -                      | -                      |
| GEN7                           | 3.8                              | 0.2                              | 11.4   | 0.6    | 1.8     | 0.1     | 0.05                | 0.0                 | 0.2                  | 0.01                 | 0.2                   | 0.01                  | -                      | -                      |
| GEN8                           | 3.8                              | 0.2                              | 11.4   | 0.6    | 1.8     | 0.1     | 0.05                | 0.0                 | 0.2                  | 0.01                 | 0.2                   | 0.01                  | -                      | -                      |
| IFR1                           | -                                | -                                | -      | -      | 1.2     | 5.2     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| IFR2                           | -                                | -                                | -      | -      | 1.2     | 5.2     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| IFR3                           | -                                | -                                | -      | -      | 1.2     | 5.2     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| IFR4                           | -                                | -                                | -      | -      | 1.2     | 5.2     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| OTK1                           | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| OTK2                           | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| OTK3                           | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| OTK4                           | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| OTK5                           | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| OTK6                           | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| OTK7                           | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |

| Unit No.   | NO <sub>x</sub> <sup>1</sup> pph | NO <sub>x</sub> <sup>1</sup> tpy | CO pph | CO tpy | VOC pph | VOC tpy | SO <sub>2</sub> pph | SO <sub>2</sub> tpy | PM <sub>10</sub> pph | PM <sub>10</sub> tpy | PM <sub>2.5</sub> pph | PM <sub>2.5</sub> tpy | H <sub>2</sub> S (pph) | H <sub>2</sub> S (tpy) |
|------------|----------------------------------|----------------------------------|--------|--------|---------|---------|---------------------|---------------------|----------------------|----------------------|-----------------------|-----------------------|------------------------|------------------------|
| OTL        | -                                | -                                | -      | -      | 0.7     | 0.1     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| PWTK<br>1  | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| PWTK<br>2  | -                                | -                                | -      | -      | 0.0     | 0.0     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| PWTL       | -                                | -                                | -      | -      | 0.4     | 2.5     | -                   | -                   | -                    | -                    | -                     | -                     | 0.0                    | 0.0                    |
| ROAD       | -                                | -                                | -      | -      | -       | -       | -                   | -                   | 0.7                  | 2.2                  | 0.07                  | 0.2                   | -                      | -                      |
| RHTR<br>1  | 1.0                              | 4.6                              | 0.6    | 2.8    | 0.2     | 0.9     | 0.09                | 0.4                 | 0.2                  | 1.1                  | 0.2                   | 1.1                   | -                      | -                      |
| RHTR<br>2  | 1.0                              | 4.6                              | 0.6    | 2.8    | 0.2     | 0.9     | 0.09                | 0.4                 | 0.2                  | 1.1                  | 0.2                   | 1.1                   | -                      | -                      |
| RHTR<br>3  | 1.0                              | 4.6                              | 0.6    | 2.8    | 0.2     | 0.9     | 0.09                | 0.4                 | 0.2                  | 1.1                  | 0.2                   | 1.1                   | -                      | -                      |
| SHTR1      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR2      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR3      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR4      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR5      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR6      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR7      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR8      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR9      | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR<br>10 | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR<br>11 | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| SHTR<br>12 | 1.7                              | 7.6                              | 1.1    | 4.6    | 0.4     | 1.5     | 0.1                 | 0.6                 | 0.4                  | 1.8                  | 0.4                   | 1.8                   | -                      | -                      |
| TO1        | 2.5                              | 11.0                             | 2.1    | 9.2    | 0.7     | 3.0     | 0.9                 | 3.8                 | 0.2                  | 1.0                  | 0.2                   | 1.0                   | 0.005                  | 0.02                   |
| TO2        | 2.5                              | 11.0                             | 2.1    | 9.2    | 0.7     | 3.0     | 0.9                 | 3.8                 | 0.2                  | 1.0                  | 0.2                   | 1.0                   | 0.005                  | 0.02                   |
| TO3        | 2.5                              | 11.0                             | 2.1    | 9.2    | 0.7     | 3.0     | 0.9                 | 3.8                 | 0.2                  | 1.0                  | 0.2                   | 1.0                   | 0.005                  | 0.02                   |
| TUR1       | 8.4                              | 36.8                             | 5.1    | 22.3   | 9.2     | 40.3    | 2.1                 | 9.4                 | 9.2                  | 40.3                 | 9.2                   | 40.3                  | -                      | -                      |
| TUR2       | 8.4                              | 36.8                             | 5.1    | 22.3   | 9.2     | 40.3    | 2.1                 | 9.4                 | 9.2                  | 40.3                 | 9.2                   | 40.3                  | -                      | -                      |

| Unit No. | NO <sub>x</sub> <sup>1</sup> pph | NO <sub>x</sub> <sup>1</sup> tpy | CO pph | CO tpy | VOC pph | VOC tpy | SO <sub>2</sub> pph | SO <sub>2</sub> tpy | PM <sub>10</sub> pph | PM <sub>10</sub> tpy | PM <sub>2.5</sub> pph | PM <sub>2.5</sub> tpy | H <sub>2</sub> S (pph) | H <sub>2</sub> S (tpy) |
|----------|----------------------------------|----------------------------------|--------|--------|---------|---------|---------------------|---------------------|----------------------|----------------------|-----------------------|-----------------------|------------------------|------------------------|
| TUR3     | 8.4                              | 36.8                             | 5.1    | 22.3   | 9.2     | 40.3    | 2.1                 | 9.4                 | 9.2                  | 40.3                 | 9.2                   | 40.3                  | -                      | -                      |
| TUR4     | 8.4                              | 36.8                             | 5.1    | 22.3   | 9.2     | 40.3    | 2.1                 | 9.4                 | 9.2                  | 40.3                 | 9.2                   | 40.3                  | -                      | -                      |

- 1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO<sub>2</sub>.
  - 2 For Title V facilities, the Title V annual fee assessments are based on the sum of allowable tons per year emission limits in Sections A106 and A107.
  - 3 Compliance with emergency flare emission limits is demonstrated by limiting combustion to pilot and/or purge gas only.
  - 4 To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110.F
- “-” indicates the application represented emissions of this pollutant are not expected.  
 “<” 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.  
 “\*” indicates hourly emission limits are not appropriate for this operating situation.

| <b>Table 106.B: BACT Emission Limits in Addition to those in Table 107.A</b> |   |                              |                               |  |                           |                            |                            |
|--|---|------------------------------|-------------------------------|--|---------------------------|----------------------------|----------------------------|
| Unit No.   | NO <sub>x</sub> ppmv @ 15% O <sub>2</sub> | CO ppmv @ 15% O <sub>2</sub> | VOC ppmv @ 15% O <sub>2</sub> | SO <sub>2</sub> <sup>2</sup> / H <sub>2</sub> SO <sub>4</sub> gr/100 scf | PM <sub>10</sub> lb/MMBtu | PM <sub>2.5</sub> lb/MMBtu | CO <sub>2</sub> e lb/MMBtu |
| TUR1 to TUR4   | 2.0                                       | 2.0                          | 4.0                           | 0.75   | 0.00786                   | 0.00786                    | 117                        |
| Unit No.   | NO <sub>x</sub> <sup>1</sup> g/bhp-hr     | CO g/bhp-hr                  | VOC g/bhp-hr                  | SO <sub>2</sub> <sup>2</sup> gr/100 scf                                  | PM <sub>10</sub> lb/MMBtu | PM <sub>2.5</sub> lb/MMBtu | CO <sub>2</sub> e lb/MMBtu |
| GEN1 to GEN8   | 0.5                                       | 1.5                          | 0.21                          | 0.75   | 7.71E-05                  | 7.71E-05                   | 117<br>(= 379 g/hp-hr)     |
| <b>Table 106.B: BACT Emission Limits</b>                                     |   |                              |                               |  |                           |                            |                            |
| Unit No.   | NO <sub>x</sub> lb/MMBtu                  | CO lb/MMBtu                  | VOC lb/MMBtu                  | SO <sub>2</sub> <sup>2</sup>   | PM <sub>10</sub> lb/MMBtu | PM <sub>2.5</sub> lb/MMBtu | CO <sub>2</sub> e lb/MMBtu |
| CHTR1 to CHTR3   | 0.034                                     | 0.0163                       | 0.0054                        | 0.75 (P)   | 0.0075                    | 0.0075                     | 117                        |
| RHTR1 to RHTR3   | 0.0267                                    | 0.0163                       | 0.0054                        | 0.75   | 0.0075                    | 0.0075                     | 117                        |
| SHTR1 to SHTR12  | 0.0267                                    | 0.0163                       | 0.0054                        | 0.75   | 0.0075                    | 0.0075                     | 117                        |

|               | <b>NO<sub>x</sub><br/>lb/MMBtu</b>                    | <b>CO<br/>lb/MMBtu</b>                | <b>VOC<br/>lb/MMBtu<br/>or DRE</b> | <b>SO<sub>2</sub><sup>2</sup></b> | <b>PM<sub>10</sub><br/>lb/MMBtu<br/>or DRE</b> | <b>PM<sub>2.5</sub><br/>lb/MMBtu<br/>or DRE</b> | <b>CO<sub>2e</sub><br/>lb/MMBtu</b>        |
|---------------|---|---------------------------------------|------------------------------------|-----------------------------------|--|---|--|
| ECD1          | 0.098   | 0.082                                 | 98-99%<br>DRE                      | 0.75                              | 98-99%<br>DRE                                  | 98-99%<br>DRE                                   | 0.25 lb/scf<br>(= 96.2 lbs<br>/MMBtu)      |
|               | <b>NO<sub>x</sub><br/>ppmv @<br/>3% O<sub>2</sub></b> | <b>CO ppmv<br/>@ 3% O<sub>2</sub></b> | <b>VOC<br/>lb/MMBtu<br/>or DRE</b> | <b>SO<sub>2</sub><sup>2</sup></b> | <b>PM<sub>10</sub><br/>lb/MMBtu<br/>or DRE</b> | <b>PM<sub>2.5</sub><br/>lb/MMBtu<br/>or DRE</b> | <b>CO<sub>2e</sub><br/>lb/MMBtu</b>        |
| TO1 to<br>TO3 | 30  | 50                                    | 98-99%<br>DRE                      | 0.75                              | 98-99%<br>DRE                                  | 98-99%<br>DRE                                   | 117<br>lb/MMBtu<br>(and<br>101,557<br>tpy) |

**Table 106.B: BACT Emission Limits**

| <b>Unit No.</b>            | <b>CO<sub>2e</sub> tpy BACT</b>   |
|----------------------------|---|
| FL1 to<br>FL3              | 5539 for pilot and purge under no cogen scenario;<br>16,618 for pilot and purge under full cogen scenario |
| FL1-<br>FL3<br>CRYO<br>SSM | 16,652 for cryo blowdown gas SSM  |
| FL1-<br>FL3<br>OVHD<br>SSM | 9441 for stabilizer overhead blowdown gas SSM   |

- 1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO<sub>2</sub> and g/bhp-hr stands for grams per brake horsepower hour.
- 2 Pipeline quality natural gas for BACT determination as used in this permit shall be defined as: 0.75 grains of total sulfur/100 dscf of natural gas and after processing through the inlets, inlet separator, oil stabilization, and amine units to remove impurities. Applies to all combustion units.
- 3 “-” indicates no unit/pollutant specific BACT emission limit applies.

**Table 106.C: Allowable Ammonia (NH<sub>3</sub>) Emissions**

| <b>Unit No.</b> | <b>NH<sub>3</sub> pph</b> | <b>NH<sub>3</sub> tpy</b> |
|-----------------|---------------------------|---------------------------|
| TUR1            | 15.9                      | 69.5                      |
| TUR2            | 15.9                      | 69.5                      |
| TUR3            | 15.9                      | 69.5                      |
| TUR4            | 15.9                      | 69.5                      |

- B. Unit FUG, including Units CRYO1 to CRYO3, MOL1 to MOL3, and including all equipment, except compressors, within a process unit shall not exceed volatile organic compound (VOC) equipment leak detection standards (500 ppm) according to 40 CFR 60, Subpart OOOOa (§60.5400a).
- C. Units GEN1 to GEN8 (RICE engines), NO<sub>x</sub> emissions shall not exceed 2.0 g/hp-hr (or 160 ppmvd at 15 percent oxygen), CO emissions shall not exceed 4.0 g/hp-hr (or 540 ppmvd at 15 percent oxygen), and VOC emissions shall not exceed 1.0 g/hp-hr (or 86 ppmvd at 15 percent oxygen). (40 CFR 60, Subpart JJJJ, Table 1)
- D. Units TUR1 to TUR4, nitrogen dioxide emissions shall not exceed 15 ppm at 15 percent oxygen (or 0.43 lbs/MWh) (40 CFR 60, Subpart KKKK, Table 1); and sulfur dioxide emissions shall not exceed 0.90 lbs/MWh or 0.060 lbs/MMBtu (40 CFR 60, Subpart KKKK per §60.4330(a)(1) and (a)(2)).
- E. Units TUR1 to TUR4, formaldehyde emissions shall be limited to 91 ppbvd or less at 15 percent oxygen except during startup (40 CFR 63, Subpart YYYY, Table 1).
- F. Units CHTR1 to CHTR3, NO<sub>x</sub> emissions shall not exceed 0.1 lb/MMBtu (40 CFR 60, Subpart Db per §60.44b(a) NO<sub>x</sub> natural gas standard).

**A107 Facility: Allowable Startup, Shutdown, & Maintenance (SSM) Emissions**

- A. The maximum allowable SSM emission limits for this facility are listed in Table 107.A and were relied upon by the Department to determine compliance with applicable regulations.

**Table 107.A: Allowable SSM Units, Activities, and Emission Limits (including BACT<sup>2</sup>)<sup>5</sup>**

| Unit No.                             | NO <sub>x</sub> <sup>1</sup> pph Bact | NO <sub>x</sub> <sup>1</sup> tpy | CO pph Bact | CO tpy | VOC pph Bact | VOC tpy | SO <sub>2</sub> pph Bact | SO <sub>2</sub> tpy | PM <sub>10</sub> pph Bact | PM <sub>10</sub> tpy | PM <sub>2.5</sub> pph Bact | PM <sub>2.5</sub> tpy | H <sub>2</sub> S (pph) | H <sub>2</sub> S (tpy) |
|--------------------------------------|---------------------------------------|----------------------------------|-------------|--------|--------------|---------|--------------------------|---------------------|---------------------------|----------------------|----------------------------|-----------------------|------------------------|------------------------|
| <sup>3</sup> FL1-FL3<br>CRY<br>O-SSM | 102.4                                 | 18.6                             | 204.5       | 37.2   | 210.1        | 38.2    | 0.05                     | 0.01                | 5.5                       | 1.0                  | 5.5                        | 1.0                   | 5.4E-4                 | 1.0E-4                 |

| Unit No.                       | NO <sub>x</sub> <sup>1</sup> pph Bact | NO <sub>x</sub> <sup>1</sup> tpy | CO pph Bact | CO tpy | VOC pph Bact | VOC tpy | SO <sub>2</sub> pph Bact | SO <sub>2</sub> tpy | PM <sub>10</sub> pph Bact | PM <sub>10</sub> tpy | PM <sub>2.5</sub> pph Bact | PM <sub>2.5</sub> tpy | H <sub>2</sub> S (pph) | H <sub>2</sub> S (tpy) |
|--------------------------------|---------------------------------------|----------------------------------|-------------|--------|--------------|---------|--------------------------|---------------------|---------------------------|----------------------|----------------------------|-----------------------|------------------------|------------------------|
| <sup>3</sup> FL1-FL3 OVH D-SSM | 61.5                                  | 11.2                             | 122.8       | 22.4   | 404.3        | 73.6    | 0.0                      | 0.0                 | 3.3                       | 0.6                  | 3.3                        | 0.6                   | 0.0                    | 7.3E-6                 |
| SSM <sup>4</sup>               | -                                     | -                                | -           | -      | -            | 10.0    | -                        | -                   | -                         | -                    | -                          | -                     | -                      | -                      |

1. Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO<sub>2</sub>.
2. Pound per hour limits for NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are PSD BACT limits for Units FL1-FL3-CRYO-SSM and FL1-FL3-OVHD-SSM.
3. This authorization represents emissions sent to the flares and does not represent venting emissions.
4. This authorization does not include VOC combustion emissions. This SSM is due only to venting of VOC such as equipment blowdowns.
5. To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110.F.  
 “-” indicates the application represented emissions of this pollutant are not expected.  
 “<” indicates the application represented that uncontrolled venting, blowdown, or pigging emissions of H<sub>2</sub>S are less than 0.1 pph or 0.44 tpy. Allowable limits, monitoring, and recordkeeping are not required on this level of H<sub>2</sub>S venting, blowdown, or pigging emissions.

B. The authorization of emission limits for startup, shutdown, maintenance, and malfunction does not supersede the requirements to minimize emissions according to General Conditions B101.F and B107.A.

C. SSM Emissions for Venting of VOC (SSM)

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| <p><b>Requirement:</b> The permittee shall perform a facility inlet gas analysis once every year based on a calendar year and complete the following recordkeeping to demonstrate compliance with routine and predictable startup, shutdown, and maintenance (SSM) emission limits in Table 107.A.</p>  |
| <p><b>Monitoring:</b> The permittee shall monitor the permitted routine and predictable startups and shutdowns and scheduled maintenance events.</p>  |
| <p><b>Recordkeeping:</b></p> <ol style="list-style-type: none"> <li>(1) To demonstrate compliance, each month records shall be kept of the cumulative total of VOC emissions during the first 12 months due to SSM events and, thereafter of the monthly rolling 12-month total VOC emissions.</li> <li>(2) Records shall also be kept of the inlet gas analysis, the percent VOC of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the VOC emissions due to SSM events.</li> <li>(3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.</li> </ol> |

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| <b>Reporting:</b> The permittee shall report in accordance with Section B110. |
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D. Facility SSM Emissions (Units FL1-FL3-CRYO-SSM and FL1-FL3-OVHD-SSM)

**Requirement:** To demonstrate compliance with the allowable routine and predictable startup, shutdown, and maintenance (SSM) emission limits, including BACT limits, in Table 107.A and in Table 106.B for Unit FL1-FL3-CRYO-SSM (cryo blowdown to flares) and Unit FL1-FL3-OVHD-SSM (overhead blowdown to flares), the permittee shall operate the flare in accordance with the requirements of Condition A206.A and A206.B of this permit and meet the following monitoring and recordkeeping:

(1) **Emissions included in Permit Limit and/or Reported as Excess Emissions**

- (a) All emissions due to routine or predictable startup, shutdown, and/or maintenance (SSM) must be included under and shall not exceed the SSM emission limits in this permit. For any emissions due to malfunctions, the permittee shall report these as excess emissions in accordance with 20.2.7 NMAC.
- (b) Once emissions from a malfunction event are submitted in the final report (due no later than ten days after the end of the excess emissions event) per 20.2.7.110.A(2) NMAC, the event is considered an excess emission and cannot be applied toward the SSM limits in this permit.

(2) **Emissions Exceeding the Permit Limit**

If emissions from SSM exceed the SSM emission limits, the permittee shall report the emissions as excess emissions in accordance with 20.2.7.110 NMAC.

(3) **Emissions Due to Preventable Events**

Emissions that are due entirely or in part to poor maintenance, careless operation, or any other preventable equipment breakdown shall not be included under the SSM emission limits. These emissions shall be reported as excess emissions in accordance with 20.2.7 NMAC.

**Monitoring:** The permittee shall monitor the date, time, and duration of all SSM events and distinguish Table 107.A emissions for Unit FL1-FL3-CRYO-SSM (cryo blowdown to flares) from Unit FL1-FL3-OVHD-SSM (overhead blowdown to flares) and distinguish both of these from flare (FL1-FL3) pilot/purge emissions in Table 106.A.

(1) For flared SSM emissions the permittee shall measure:

- (a) Total SCF of gas sent to each of the three flares (FL1 to FL3) for each hour and each month using a gas flowmeter and flow totalizer. A data logger (electronic storage) shall keep records of the total SCF each hour and each month for each flare. After hourly and monthly total SCF sent to each flare has been determined, the grand total SCF sent all three flares can be determined (summed). Cryo blowdowns (FL1-FL3-CRYO-SSM) shall be distinguished from Overhead blowdowns (FL1-FL3-OVHD-SSM).
- (b) The H<sub>2</sub>S content of the facility inlet gas shall be measured at least quarterly using a stain tube of the appropriate range, an inline H<sub>2</sub>S monitor, or an extended gas analysis.
- (c) With an extended gas analysis at least once every calendar year, the total sulfur content, VOC content, CH<sub>4</sub> content, the CO<sub>2</sub> content and heating value (Btu/SCF) of the gas that is

sent to each flare. The heating value shall be calculated using the combined gas stream, including pilot gas, assist gas, and waste gas accounting for differences in heat value between each gas stream component.

- (2) The flow meter, totalizer and, if used, the inline monitor for each flare shall be operated, calibrated, and maintained as specified by the manufacturer or by site specific maintenance practice and as necessary to ensure correct and accurate readings.

**Recordkeeping:**

For flared SSM, the records for Cryo blowdowns (FL1-FL3-CRYO-SSM) shall be distinguished from Overhead blowdowns (FL1-FL3-OVHD-SSM):

- (1) The permittee shall maintain hourly flowmeter and flow totalizer measurements of gas including pilot, purge, and assist gas, if applicable, sent to each of the three flares.
- (2) Each month, the permittee shall record and summarize in a table format the following:
  - (a) quarterly stain tube and/or inline H<sub>2</sub>S measurements documenting the H<sub>2</sub>S and the total sulfur content
  - (b) percent VOC, CH<sub>4</sub>, and CO<sub>2</sub> content
  - (c) gas heating value (Btu/SCF)
  - (d) the maximum hourly gas flow rate (SCF/hr) that occurred during the month for each flare
  - (e) the total month's SCF of gas sent to each flare
  - (f) the summed total month's SCF of gas sent to all three flares combined
  - (g) during the first 12-months of monitoring, the cumulative total of gas sent to all three flares combined (but distinguished by Cryo blowdowns (FL1-FL3-CRYO-SSM) from Overhead blowdowns (FL1-FL3-OVHD-SSM)
  - (h) after the first 12 months of monitoring, the monthly rolling 12-month total of gas sent to all three flares combined (but distinguished by Cryo blowdowns (FL1-FL3-CRYO-SSM) from Overhead blowdowns (FL1-FL3-OVHD-SSM).

For SSM:

- (3) The permittee shall maintain records of the annual gas analysis.
- (4) The permittee shall maintain records of flowmeter, totalizer, and inline monitor certifications, calibrations, breakdowns, reasons for the breakdown, and corrective actions taken to restore the item to service for each flare. The permittee shall also maintain documentation describing the manufacturer's operation and calibration recommendations for each item.
- (5) The permittee shall calculate and summarize the NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and H<sub>2</sub>S emissions for the maximum pph for each pollutant and the monthly-rolling 12-month total emissions for each pollutant. During the first 12 months of this condition taking effect, the permittee shall record the monthly total tons of NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, and H<sub>2</sub>S emissions. After the first 12 months of this condition taking affect, the permittee shall record the monthly rolling 12-month total tpy NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, and H<sub>2</sub>S. Any emissions that have been reported in a final excess emissions report per 20.2.7.110.A(2) NMAC, shall be excluded from this total. The permittee shall use the following information:
  - (a) the H<sub>2</sub>S content, total sulfur content, VOC content, CH<sub>4</sub> and CO<sub>2</sub> content and the gas

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| <p>heating value (Btu/SCF) from the most recent H<sub>2</sub>S measurements and gas analyses</p> <p>(b) the maximum hourly gas flow rate (SCF/hr), total monthly volume (SCF) of gas sent to each flare, emission factors used to calculate emissions, and any other parameters used to calculate NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and H<sub>2</sub>S emissions.</p> <p>(6) The permittee shall subtract out actual flare (FL1 to FL3) pilot/purge emissions as authorized in Table 106.A to verify compliance with Table 107.A limits.</p> <p><b>(7) Emissions included Under Permit Limit or Reported as Excess Emissions</b></p> <p>The permittee shall record whether emissions are included under the permit limits for SSM or if an event resulted in a final excess emissions report per 20.2.7.110.A(2) NMAC.</p> <p><b>(8) Condition B109 Records</b></p> <p>The permittee shall retain monitoring records, including the date, time, and duration of each SSM event. The permittee shall keep records in accordance with Condition B109 of this permit except that the requirement to record a description of the <u>cause</u> of the event shall not apply to SSM events as long as the emissions do not exceed the SSM emission limits.</p> |
| <p><b>Reporting:</b> The permittee shall report in accordance with Section B110.</p>   |

#### **A108 Facility: Allowable Operations**

- A. This facility is authorized for continuous operation. Monitoring, recordkeeping, and reporting are not required to demonstrate compliance with continuous hours of operation.
- B. Facility Throughput Limits

**Requirement:** To demonstrate compliance with the allowable emission limits in Table 106.A and BACT limits in Table 106.B, the permittee shall limit facility-wide throughputs to the following maximum figures:

- (1) Natural gas: 750 MMscf/day;
- (2) Oil/condensate: 200 million barrels/day;
- (3) Produced water: 10 million barrels/day.

**Monitoring:** Facility inlet flowrates from:

- (1) gas inlet;
- (2) NGL inlet; and
- (3) oil inlet;

Shall be continuously monitored. The flowrates shall be determined using an appropriate monitoring instrument or method that directly measures natural gas, NGL, or oil flowrates into the facility with an accuracy of  $\pm 2\%$  or better.

Monitoring shall also include third party truck in-loading of oil products.

**Recordkeeping:** The permittee shall continuously monitor daily volumetric flowrates, for inlet pipelines (gas inlet, NGL inlet, and oil inlet), using appropriate flowmeter(s) and flow totalizer(s) that are equipped with a chart recorder or data loggers (electronic storage). For third party truck in-loading of oil products, daily number of truck loads, and volume (in gallons or barrels) per day shall be recorded.

Flow meters and totalizers shall be operated, calibrated, and maintained as specified by the manufacturer or equivalent and as necessary to ensure correct and accurate readings.

Records for each of 1) natural gas, 2), oil/condensate, and 3) produced water:

- (1) During the first 12-months of monitoring, the cumulative total of each
- (2) After the first 12 months of monitoring, the monthly rolling 12-month total of each.

Records indicating the daily flows/throughputs, the total annual (calendar year) flows/throughputs, and the monthly rolling 12-month average flows/throughputs shall be maintained onsite for a minimum of five (5) years from the time of recording and made available to Department personnel upon request.

**Reporting:** The permittee shall report in accordance with Section B110.

#### C. Annual Inlet Extended Gas Analyses (Gas Inlet, NGL Inlet, and Oil Inlet)

**Requirement:** The permittee shall obtain an extended gas analysis of the facility inlets for each of the three inlets: Gas Inlet, NGL Inlet, and Oil Inlet. Gas, NGL, and oil composition (including BTEX, H<sub>2</sub>S, and total sulfur components) shall be determined annually (calendar year). H<sub>2</sub>S shall be determined by Reference Method 15 with detection limit  $\leq 0.5$  ppmv.

**Monitoring:** Monitoring shall be accomplished by performing the above stated requirement for the annual extended gas analyses and can be used to meet Conditions A107.C, A107.D, and A206.A as appropriate to meeting those conditions.

**Recordkeeping:** The permittee shall maintain records of the extended gas analyses and H<sub>2</sub>S measurements in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

### A109 Facility: Reporting Schedules

- A. The permittee shall report according to the Specific Conditions and General Conditions of this permit.

**A110 Facility: Fuel and Fuel Sulfur Requirements**

- A. Fuel and Fuel Sulfur Requirements (all combustion equipment including turbines, heaters, generators, and pilot/purge gas sent to the flares, thermal oxidizers, and enclosed combustion device)

**Requirement:** All combustion emission units shall combust only natural gas containing no more than 0.75 grains of total sulfur per 100 dry standard cubic feet (as BACT, Table 106.B, based on emissions calculations for turbines and other combustion equipment).

**Monitoring:** Compliance is demonstrated through keeping records.

**Recordkeeping:**

- (1) The permittee shall demonstrate compliance with the natural gas or fuel oil limit on total sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous or liquid fuel, or fuel gas analysis, specifying the allowable limit or less.
- (2) If fuel gas analysis is used, the analysis shall not be older than six months.
- (3) Alternatively, compliance shall be demonstrated by keeping a receipt or invoice from a commercial fuel supplier, with each fuel delivery, which shall include the delivery date, the fuel type delivered, the amount of fuel delivered, and the maximum sulfur content of the fuel.

**Reporting:** The permittee shall report in accordance with Section B110.

**A111 Facility: 20.2.61 NMAC Opacity**

- A. 20.2.61 NMAC Opacity Limit (combustion equipment: Units SHTR1-12, CHTR1-3, RHTR1-3, TUR1-4, and the emergency engines GEN1-8)

**Requirement:** Visible emissions from all stationary combustion emission stacks shall not equal or exceed an opacity of 20 percent in accordance with the requirements at 20.2.61.109 NMAC.

**Monitoring:**

- (1) Use of natural gas fuel constitutes compliance with 20.2.61 NMAC unless opacity equals or exceeds 20% averaged over a 10-minute period. When any visible emissions are observed during operation other than during startup mode, opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 9 (EPA Method 9) as required by 20.2.61.114 NMAC, or the operator will be allowed to shut down the equipment to perform maintenance/repair to eliminate the visible emissions. Following completion of equipment maintenance/repair, the operator shall conduct visible emission observations following startup in accordance with the following procedures:
  - (a) Visible emissions observations shall be conducted over a 10-minute period during operation after completion of startup mode in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 22 (EPA Method 22). If no visible emissions are observed, no further action is required.

- (b) If any visible emissions are observed during completion of the EPA Method 22 observation, subsequent opacity observations shall be conducted over a 10-minute period, in accordance with the procedures at EPA Method 9 as required by 20.2.61.114 NMAC.
- (2) For emergency, standby, or limited use compression ignition engines that operate on a limited basis, the permittee shall, at least once during any year that the unit is operated and no less frequently than once every 5 years regardless of unit operation, measure opacity during steady state operation on each Unit for a minimum of 10 minutes in accordance with the procedures of 40 CFR 60, Appendix A, Method 9. The permittee shall also measure opacity on a Unit's emissions stack anytime when visible emissions are observed during steady state operation.

For the purposes of this condition, *Startup mode* is defined as the startup period that is described in the facility's startup plan.

**Recordkeeping:**

- (1) If any visible emissions observations were conducted, the permittee shall keep records in accordance with the requirements of Section B109 and as follows:
- (a) For any visible emissions observations conducted in accordance with EPA Method 22, record the information on the form referenced in EPA Method 22, Section 11.2.
- (b) For any opacity observations conducted in accordance with the requirements of EPA Method 9, record the information on the form referenced in EPA Method 9, Sections 2.2 and 2.4.
- (c) For each emergency, black start, and limited use engine, the permittee shall also record the number of operating hours per year of each unit and the reason for operating the unit.

**Reporting:** The permittee shall report in accordance with Section B110.

**A112 Facility: Haul Roads**

A. Haul Road Particulate Matter Control (Unit ROAD)

**Requirements:** The haul road shall be treated and maintained with applications of base course to reduce the amount of dust on the road. This requirement shall demonstrate compliance with the PM10 and PM2.5 (pph and tpy) emission limits in Table 106.A and the BACT control requirements in Table 105.A for Unit ROAD. This condition shall demonstrate compliance with the 60% control efficiency used in the permit application and modeling.

**Monitoring:** Every six months, at a minimum, the permittee shall inspect the road to determine if road surfaces need any maintenance and to ensure that the road has not eroded.

**Recordkeeping:** The permittee shall record the dates of the six-month inspections, including a record of any road maintenance or road repair that results from the inspection. The records shall include the date, time, quantity, and location(s) of the measures taken.

**Reporting:** The permittee shall report in accordance with Section B110.

**A113 Alternative Operating Scenarios**

- A. The permittee shall operate this facility under only one of the following three scenarios or sub-scenarios at a time.
- B. No cogeneration scenario: Under this operating scenario the facility shall not have any turbines operating. Turbine installation shall be allowed as determined by this permit, but the turbines shall not operate under this scenario. A maximum of 12 stabilizer heaters (SHTR1 to SHTR12) may be operating and a maximum of three cryo heaters (CHTR1 to CHTR3) may be operating.
- C. Full cogeneration scenario: Under this operating scenario all four turbines (TUR1 to TUR4) shall be installed and operational. A maximum of two stabilizer heaters may be operating.
- D. Partial cogeneration scenario: This operating scenario has three sub-scenarios:
  - (1) One turbine is operating. A maximum of eight stabilizer heaters and a maximum of three cryo heaters may be operating.
  - (2) Two turbines are operating. A maximum of six stabilizer heaters and a maximum of two cryo heaters may be operating.
  - (3) Three turbines are operating. A maximum of four stabilizer heaters and a maximum of one cryo heater may be operating.
- E. Flare operating scenarios: Flares FL1 and FL2 are the primary flares and FL3 serves as a backup or emergency flare to either FL1 or FL2. FL3 is an auto-ignite flare and has no pilot/purge emissions unless it is operating. If at any time all three flares became operational simultaneously, combined emissions from all three flares shall not exceed the allowable limits in Table 106.A and Table 107.A.

**EQUIPMENT SPECIFIC REQUIREMENTS****OIL AND GAS INDUSTRY****A200 Oil and Gas Industry**

- A. This section has common equipment related to most Oil and Gas Operations.

**A201 Engines****A. Hours of Operation (Units GEN1 to GEN8)**

**Requirement:** To ensure compliance with allowable emission limits in Table 106.A, and BACT limits in Table 106.B:

- (1) Each generator is limited to a total operating time of 100 hours per 12 months;
- (2) No more than three (3) individual generator units from the pool of GEN1 to GEN8 may operate simultaneously; and
- (3) Units GEN6, GEN7, and GEN8 may not operate for more than 1-hour at a time.

The permittee shall demonstrate compliance with this BACT requirement by meeting the following monitoring and recordkeeping.

**Monitoring:** The permittee shall monitor the operating hours of each unit with a non-resettable hour meter installed on each unit.

**Recordkeeping:** The permittee shall keep the following operating hour records for each unit:

- (1) During the first 12 months of monitoring, the cumulative total of operating hours per unit;
- (2) After the first 12 months of monitoring, the monthly rolling 12-month total operating hours per unit.
- (3) The permittee shall record dates and times of operation for each generator to demonstrate that paragraphs (2) and (3) under Requirement have been met.

The permittee shall meet the recordkeeping requirements in Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

**B. Maintenance and Repair Monitoring and Good Combustion Practices (Units GEN1 to GEN8)**

**Requirement:** Compliance with the allowable emission limits in Table 106.A and BACT controls in Table 105.A and BACT Limits in Table 106.B shall be demonstrated by the following Good Combustion Practices:

- (1) All generator engines shall be of lean burn design and shall be fueled only by pipeline quality natural gas as defined in this permit (0.75 gr S/100scf).
- (2) Each generator engine shall meet any guaranteed emission rates as provided by the manufacturer.
- (3) Perform annual (once per 12-month) inspections to ensure proper operation of the units and perform tune-ups as needed, and properly maintaining and repairing the units per manufacturer recommendations.

**Monitoring:** Maintenance and repair shall meet the minimum manufacturer's or permittee's recommended maintenance schedule. Activities that involve maintenance, adjustment, replacement, or repair of functional components with the potential to affect the operation of an emission unit shall be documented as they occur. Each unit shall be maintained as specified at 40 CFR 60.4237.

**Recordkeeping:** The permittee shall maintain records in accordance with Section B109, including records of maintenance and repairs activities and a copy of the manufacturer's or permittee's recommended maintenance schedule.

**Reporting:** The permittee shall report in accordance with Section B110.

C. Initial Compliance Tests NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> (Units GEN1 to GEN8)

**Requirement:** Compliance with the allowable emission limits in Table 106.A and BACT limits in Table 106.B shall be demonstrated by performing an initial compliance test.

**Monitoring:** The permittee shall perform an initial compliance test in accordance with the General Testing Requirements of Section B111. Emission testing is required for NO<sub>x</sub> and CO. Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.

The monitoring exemptions of Section B108 do not apply to this requirement. For units with g/hp-hr emission limits, the engine load shall be calculated by using the following equation:

$$\text{Load (hp)} = \frac{\text{Fuel consumption (scfh)} \times \text{Measured fuel heating value (LHV btu/scf)}}{\text{Manufacturer's rated BSFC (btu/bhp-hr) at 100\% load or best efficiency}}$$

- (1) EPA Reference Method Tests for NO<sub>x</sub> and CO, listed in Condition B111.B, shall be completed on each engine.
- (2) Compliance with the CO emission limits shall be deemed to demonstrate compliance with the VOC emission limits.
- (3) EPA Reference Method Tests for PM and condensable particulate matter (CPM) listed in Condition B111.B shall be completed on at least 3 of Units GEN1 to GEN8.
- (4) Test results for filterable PM and CPM shall be combined to verify compliance with allowable PM<sub>10</sub> and PM<sub>2.5</sub> emission limits in Table 106.A and with the PM<sub>10</sub> and PM<sub>2.5</sub> BACT limits in Table 106.B. Only test results for filterable particulate matter shall be used to demonstrate compliance with the PM emission limits.
- (5) The tests required for PM and CPM shall be extended to 2-hour test runs to ensure accurate samples are obtained.
- (6) Tests shall be completed in accordance with Section B111 of this permit, including the timeframe(s) according to B111.A(2).

**Recordkeeping:** The permittee shall maintain records in accordance with the applicable Sections in B109, B110, and B111.

**Reporting:** The permittee shall report in accordance with the applicable Sections in B109, B110, and B111.

D. 40 CFR 60, Subpart JJJJ (Units GEN1 to GEN8)

**Requirement:** The units will be subject to 40 CFR 60, Subparts A and JJJJ if the units are constructed (ordered) and manufactured after the applicability dates in 40 CFR 60.4230 and the

permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart JJJJ, including the emission standards for emergency engines in Table 1 of Subpart JJJJ.

**Monitoring:** The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to §60.4237 and §60.4243.

**Recordkeeping:** The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to §60.4245.

**Reporting:** The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to §60.4245.

E. 40 CFR 63, Subpart ZZZZ (Units GEN1 to GEN8)

**Requirement:** The units will be subject to 40 CFR 63, Subparts A and ZZZZ if they meet the applicability criteria in 40 CFR 63.6590. The permittee shall comply with any applicable notification requirements in Subpart A and any specific requirements of Subpart ZZZZ, including initial notification.

**Monitoring:** The permittee shall comply with all applicable monitoring requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.

**Recordkeeping:** The permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63, Subpart A and Subpart ZZZZ, including but not limited to §63.6655 and §63.10.

**Reporting:** The permittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and ZZZZ, including but not limited to §63.6645, §63.6650, §63.9, and §63.10.

**A202 Glycol Dehydrators – Not Required**

**A203 Tanks**

A. Tank Operations and Controls (Units OTK1 to OTK6, OTK7, GBS1, and PWTK1 to PWTK2)

**Requirement:** Compliance with the allowable emission limits in Table 106.A and BACT control requirements in Table 105.A and BACT limits in Table 106.B shall be demonstrated by meeting the following requirements for tanks and separators.

- (1) The vents for tanks, vessels, and separators, Units OTK1 to OTK6, OTK7, GBS1, and PWTK1 to PWTK2 shall be routed at all times to the enclosed combustion device (ECD1).
- (2) No flash emissions from OTK1 to OTK6, OTK7, GBS1, and PWTK1 to PWTK2 shall be emitted directly to the atmosphere. Flashing emissions shall be captured and managed at all times, either by other processing stages (such as oil stabilization), back to the inlet, or routing to the ECD1. In addition to venting to the ECD1:
  - (a) GBS1 liquids flow to tanks PWTK1 to PWTK2 and OTK7,
  - (b) OTK7 liquids flow to oil stabilization or to truck off-loading (OTL),

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| <p>(c) PWTK1 to PWTK2 liquids flow to truck off-loading (PWTL) or to pipeline,</p> <p>(d) OTK1 to OTK6 liquids flow to oil tanks IFR1 to IFR4 or back to inlet.</p> <p>(3) All emissions from these fixed roof tanks and vessels shall also be controlled as described in this condition and in Table 105.A, and where appropriate the tanks shall be filled through a submerged fill pipe.</p>   |
| <p><b>Monitoring:</b> The permittee shall conduct the following monitoring on a semi-annual basis:</p> <p>(1) Inspect each tank, vessel, and separator vent and all associated piping to ensure that the closed vent system is properly routed to the ECD1,</p> <p>(2) Inspect all piping and closed vent systems to oil stabilization equipment to ensure that all flash emissions not captured by the ECD1 are captured by stabilization and routing back to inlet,</p> <p>(3) Inspect each tank/vessel, the ECD1, and all associated piping for corrosion and gas leaks,</p> <p>(4) Although the tanks are not subject to NSPS OOOOa, the leak detection monitoring required by 40 CFR 60, Subpart OOOOa may be used to satisfy monitoring of the closed vent systems for corrosion and gas leaks if they meet or exceed the requirements of this condition.</p> |
| <p><b>Recordkeeping:</b></p> <p>(1) The permittee shall maintain records of the tanks/vessels to include the following:</p> <p>(a) Tank/vessel capacity</p> <p>(b) Material stored</p> <p>(c) Fill pipe design</p> <p>(2) The permittee shall record the results of all semi-annual tank and equipment inspections chronologically, noting any maintenance or repairs needed to bring the oil tanks, slop oil tank, gunbarrel tank, produced water tanks, and closed loop systems into compliance with permit conditions.</p> <p>(3) Records shall also be maintained in accordance with Section B109.</p>  |
| <p><b>Reporting:</b> The permittee shall report in accordance with Section B110.</p>  |

#### B. Tank Operations and Controls (Units IFR1 to IFR4)

**Requirement:** Compliance with the allowable emission limits in Table 106.A and BACT control requirements in Table 105.A and BACT limits in Table 106.B shall be demonstrated by meeting the following requirements for the IFR tanks.

These tanks shall be controlled by floating roof design that has mechanical/liquid primary and secondary seals and the tanks shall only be filled through a submerged fill pipe. The tanks shall also be connected to pipelines that will transport oil off site.

**Monitoring:** The permittee shall conduct the following monitoring on a quarterly basis:

- (1) Inspect for each tank during roof landings that floating roofs are functioning properly and inspect all primary and secondary seals,
- (2) Follow all maintenance and repair procedures as recommended in maintenance schedules for this tank design,
- (3) Inspect each tank and all associated piping for corrosion and gas leaks,
- (4) Although the tanks are not subject to NSPS OOOOa, the leak detection monitoring required by 40 CFR 60, Subpart OOOOa may be used to satisfy monitoring if they meet or exceed the requirements of this condition.

**Recordkeeping:**

- (1) The permittee shall maintain records of the tanks to include the following:
  - (a) Tank/vessel capacity
  - (b) Material stored
  - (c) Fill pipe design
- (2) The permittee shall record the results of all quarterly tank and equipment inspections chronologically, noting any maintenance or repairs needed to bring the oil tanks, into compliance with permit conditions.
- (3) Records shall be kept of maintenance and repair activities and the permittee shall keep onsite a copy of the manufacturer's or permittee's recommended maintenance schedule,
- (4) Records shall also be maintained in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

- C. Tank Throughput and Separator Pressure (for units with flash emissions, Units OTK1 to OTK6, OTK7, and GBS1)

**Requirement:** Compliance with the allowable emission limits in Table 106.A, BACT controls in Table 105.A and BACT in Table 106.B shall be demonstrated by limiting the monthly rolling 12-month total oil and/or condensate throughput to tank units as follows:

- (1) OTK1 to OTK6: 9,125,002 barrels per year, for all six tanks combined;
- (2) OTK7: 759,414 barrels per year;
- (3) GBS1: 3,660,442 barrels per year;
- (4) And limiting the monthly rolling 12-month average inlet separator pressure to a maximum of 135.3 psig.

**Monitoring:** The permittee shall monitor the monthly total throughputs and the upstream inlet separator pressure once per month.

**Recordkeeping:** The permittee shall record:

- (1) The monthly total throughput of liquids to OTK1 to OTK6, OTK7, and GBS1;
- (2) The monthly inlet separator pressure;

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| <p>(3) Each month the permittee shall use these values to calculate and record:</p> <ul style="list-style-type: none"> <li>(a) During the first 12 months of monitoring, the cumulative total liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total liquid throughput to OTK1 to OTK6, OTK7, and GBS1 and;</li> <li>(b) During the first 12 months of monitoring, the average inlet separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average inlet separator pressure.</li> </ul> <p>Tank breathing and working emissions were calculated using HYSIS (for fluids analysis) and ProMax (for throughputs and emissions), which includes tank flashing emissions. Emission rates computed using the same parameters, but with a different Department approved algorithm that exceed these values will not be deemed non-compliance with this permit.</p> <p>Records shall be maintained in accordance with Section B109.</p> <p><b>Reporting:</b> The permittee shall report in accordance with Section B110.</p> |
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D. Tank Throughput (without flash emissions, Units IFR1 to IFR4)

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| <p><b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A, BACT controls in Table 105.A and BACT in Table 106.B shall be demonstrated by limiting the monthly rolling 12-month total oil throughput to the units to 73 million barrels per year, for all four tanks combined.</p>  |
| <p><b>Monitoring:</b> The permittee shall monitor the monthly total throughput once per month.</p>   |
| <p><b>Recordkeeping:</b> The permittee shall record the monthly total throughput of petroleum liquids. Each month, during the first 12 months of monitoring, the permittee shall record the cumulative total liquid throughput and after the first 12 months of monitoring, the permittee shall calculate and record the monthly rolling 12-month total petroleum liquid throughput.</p> <p>Tank breathing and working emissions were calculated using HYSIS (for fluids analysis) and ProMax (for throughputs and emissions). Emission rates computed using the same parameters, but with a different Department approved algorithm that exceed these values will not be deemed non-compliance with this permit.</p> <p>Records shall also be maintained in accordance with Section B109.</p> |
| <p><b>Reporting:</b> The permittee shall report in accordance with Section B110.</p>   |

E. Tank Throughput (without flash emissions, Units PWTK1 to PWTK2)

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| <p><b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A, BACT controls in Table 105.A and BACT in Table 106.B shall be demonstrated by limiting the monthly rolling 12-month total produced water throughput to the units to 3,660,442 barrels per year, for both tanks combined.</p>  |
| <p><b>Monitoring:</b> The permittee shall monitor the monthly total throughput once per month.</p>   |
| <p><b>Recordkeeping:</b> The permittee shall record the monthly total throughput of petroleum liquids. Each month, during the first 12 months of monitoring, the permittee shall record the cumulative total liquid throughput and after the first 12 months of monitoring, the permittee shall calculate and record the monthly rolling 12-month total petroleum liquid throughput.</p> <p>Tank breathing and working emissions were calculated using HYSIS (for fluids analysis) and</p> |

ProMax (for throughputs and emissions). Emission rates computed using the same parameters, but with a different Department approved algorithm that exceed these values will not be deemed non-compliance with this permit.

Records shall also be maintained in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

F. Truck Loadout – Produced Water (Unit PWTL) and Slop Oil/Condensate (Unit OTL)

**Requirement:** Compliance with the allowable emission limits in Table 106.A, BACT controls in Table 105.A and BACT in Table 106.B shall be demonstrated by limiting the total annual truck loadout for:

- (1) Produced water (PWTL) to 3,660,442 barrels per year;
- (2) Slop oil/condensate (OTL) to 76,650 barrels per year;
- (3) Loadout to trucks shall occur through a submerged process to minimize off-gas vapors;
- (4) A sleeve or vapor capturing device shall direct and route off-gas vapors during truck loadout to the enclosed combustion device (ECD1) for destruction.

**Monitoring:** The permittee shall:

- (1) Monitor each produced water or slop oil/condensate truck load-out to ensure that the process meets the control requirements.
- (2) Semi-annually, the permittee shall inspect the closed vent system that routes the off-gases to the ECD1.

**Recordkeeping:** The permittee shall record the monthly produced water and oil/condensate truck loadout volumes. Each month during the first 12 months of monitoring the permittee shall record the cumulative produced water (PWTL) and cumulative oil/condensate (OTL) loadout volume and after the first 12 months of monitoring, the permittee shall calculate and record a monthly rolling 12-month total loadout volume for each of PWTL and OTL. The permittee shall record the dates of the closed vent system inspections, and any repairs needed.

Records shall also be maintained in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

G. 20.2.38 NMAC, Hydrocarbon Storage Facilities (Units IFR1 to IFR4, and OTK1 to OTK7)

**Requirement:** The permittee shall comply with 20.2.38.109 NMAC and 20.2.38.112 NMAC. The permittee shall comply with the floating roof design with mechanical/liquid primary and secondary seals for Units IFR1 to IFR4 and shall comply with the fixed roof design and venting to the enclosed combustion device (ECD1) for Units OTK1 to OTK7; to minimize hydrocarbon and hydrogen sulfide loss to the atmosphere and shall not operate any of these tanks without the control devices.

**Monitoring:** The permittee shall monitor the tanks operation.

**Recordkeeping:** The permittee shall make a record of the floating rood design for IFR1 to IFR4, and of the fixed roof design and venting to ECD1 for OTK1 to OTK7.

**Reporting:** The permittee shall report in accordance with Section B110.

## H. 40 CFR 60, Subpart Kb (Units IFR1 to IFR4)

**Requirement:** The units are subject to 40 CFR 60, Subpart Kb and the permittee shall comply with the VOC standard as specified by 40 CFR 60.112b.

**Monitoring:** The permittee shall comply with the testing requirements of 40 CFR 60.113b and the monitoring requirements of 40 CFR 60.116b.

**Recordkeeping:** The permittee shall maintain records as specified by 40 CFR 60.115b and §60.116b.

**Reporting:** The permittee shall comply with reporting requirements of 40 CFR 60.115b.

## I. 40 CFR 60, Subpart OOOOa (Unit GBS1)

**Requirement:** The unit is subject to 40 CFR 60, Subparts A and OOOOa if the affected facility is constructed, modified, or reconstructed after the applicability date in 40 CFR 60.5365a and meets the applicability criteria specified at §60.5365a(e). The permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart OOOOa, including standards in §60.5395a.

**Monitoring:** The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to initial compliance at §60.5410a, §60.5411a, and §60.5412a, performance testing at §60.5413a, continuous compliance at §60.5415a, and continuous cover and control monitoring at §60.5416a and §60.5417a.

**Recordkeeping:** The permittee shall comply with all applicable notification and recordkeeping requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a.

**Reporting:** The permittee shall comply with all applicable notification and reporting requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a, and in Section B110.

## J. 40 CFR 63, Subpart HH (Units OTK1 to OTK7, PWTK1 to PWTK2, and GBS1)

**Requirement:** The units are subject to 40 CFR 63, Subpart HH including the standards at §63.766 and compliance is demonstrated by using a closed vent system connected to an enclosed combustion device (ECD1) to meet §63.766(b).

**Monitoring:** The permittee shall monitor the control conditions as specified at §63.771(c) or combination of controls specified at §63.771(d).

**Recordkeeping:** The permittee shall generate and maintain the records required by 40 CFR 63.774.

**Reporting:** The permittee shall meet all applicable reporting in 40 CFR 63.775 and in Section B110.

**A204 Heaters/Boilers**

## A. Operational Inspections of Boilers and/or Heaters and Good Combustion Practices (Units CHTR1 to CHTR3, RHTR1 to RHTR3, and SHTR1 to SHTR12)

**Requirement:** Compliance with the allowable pph and tpy emission limits in Table 106.A and BACT controls in Table 105.A and BACT Limits in Table 106.B shall be demonstrated by the

following Good Combustion Practices (GCP):

- (4) All heaters/boilers shall have low NO<sub>x</sub> burners and shall be fueled only by pipeline quality natural gas as defined in this permit (0.75 gr S/100scf).
- (5) Each heater/boiler shall meet any guaranteed emission rates as provided by the manufacturer.
- (6) Perform annual (once per 12-month) inspections to ensure proper operation of the units and perform tune-ups as needed.
- (7) At a minimum, the operational inspections shall meet those recommended by the manufacturer or shall meet the facility specific procedure submitted to the Department.
- (8) If the permittee is using a facility specific procedure it shall submit an electronic version of the procedure to the Department's Permit Section Manager within 90 days of implementing the procedure. If the plan cannot be submitted within 90 days, the permittee shall obtain written approval to extend the deadline from the Department's Permit Section, either by regular or electronic mail. The permittee shall provide additional information or make changes to the plan as requested by the Department.
- (9) The permittee shall make changes or improvements to the inspection procedure based on experience with the unit and/or new information provided by the manufacturer. This updated procedure shall be made available to the Department upon request.

**Monitoring:**

- (1) Inspections shall be completed at least once per year or more frequently as recommended by the manufacturer.
- (2) At a minimum, inspections shall include the following:
  - (a) checking indicators to verify that the optimal amount of excess combustion air is introduced into the boiler combustion process such as a blue colored, steady flame;
  - (b) inspections of the unit's components and housing for cracks or worn parts.

**Recordkeeping:**

- (1) The permittee shall maintain records of operational inspections, including the indicators used to verify optimal excess combustion air, a description of the indicators, the unit component and housing inspections, and any adjustments needed to ensure optimal operation of the unit.
- (2) The permittee shall also keep records of the manufacturer's recommended or the permittee's facility specific operational inspection procedure and shall keep records of the percent of excess combustion air required for optimal performance.
- (3) The permittee shall maintain records in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

**B. Initial Compliance Test (Units CHTR1 to CHTR3, and SHTR1 to SHTR12)**

**Requirement:** Compliance with the allowable emission limits in Table 106.A, BACT controls in Table 105.A, and BACT Limits in Table 106.B shall be demonstrated by performing initial compliance tests. Each of Units CHTR1 to CHTR3 shall be tested. A subset of at least two units and up to four units of the installed and operational Units SHTR1 to SHTR12 shall be tested.

Under the cogen scenario two SHTR units shall be tested and under the no cogen scenario up to four SHTR units shall be tested.

**Monitoring:**

- (1) The permittee shall perform an initial compliance test in accordance with the General Testing Requirements of Section B111. Emission testing is required for NO<sub>x</sub> and CO.
- (2) Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.
- (3) The monitoring exemptions of Section B108 do not apply to this requirement.
- (4) Performance testing required by 40 CFR 60, Subpart Db may be used to satisfy these testing requirements if they meet the requirements of this condition and are completed during the timelines specified in Section B111.

**Recordkeeping:** The permittee shall maintain records in accordance with the applicable Sections in B109, B110, and B111.

**Reporting:**

- (1) The permittee shall report in accordance with the applicable Sections in B109, B110, and B111.
- (2) The test report shall also include the gas flow rate, the stack gas temperature, the level of excess air, and the percent moisture.

- C. Fuel Usage for CO<sub>2</sub>e BACT (Units CHTR1 to CHTR3, and up to four of the SHTR1 to SHTR12 units)

**Requirement:** Compliance with the BACT emission limits for CO<sub>2</sub>e in Table 106.B shall be demonstrated by completing fuel flow monitoring as described in this condition. Fuel usage for each of Units CHTR1 to CHTR3 shall be monitored. A subset of at least two units and up to four units of the installed and operational Units SHTR1 to SHTR12 shall be monitored for fuel usage, and these can be the same units as monitored according to Condition A204.B.

**Monitoring:**

- (1) During all times of operation, the permittee shall monitor the monthly fuel flow rate using a properly calibrated fuel flow meter equipped with a chart recorder or datalogger (electronic storage).
- (2) Once per year, the permittee shall measure the fuel heating value by a direct analysis of the fuel or determine it by records from a commercial fuel supplier.

**Recordkeeping:**

- (1) Each month, the permittee shall calculate and record the total month's fuel usage.
- (2) The calculations used to determine the monthly CO<sub>2</sub>e emissions using the methods in 40 CFR 98, Subpart C.
- (3) During the first 12 months of monitoring, each month the permittee shall record the total fuel used to date for each heater and the cumulative tons per year (tpy) CO<sub>2</sub>e emissions from each heater.
- (4) After the first 12 months of monitoring, the permittee shall record a monthly rolling 12-month total fuel usage for each heater and the monthly rolling 12-month total of CO<sub>2</sub>e tpy emissions from each heater.

- (5) The permittee shall record the fuel heating value, CH content, and CO<sub>2</sub> content of the natural gas sent to each heater unit obtained from gas analyses required in Condition A110. The permittee shall record both the HHV and the LHV.
- (6) The permittee shall maintain records of the fuel flow meter calibrations and maintenance.
- (7) The permittee shall maintain records in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

D. 40 CFR 60, Subpart Db (Units CHTR1 to CHTR3)

**Requirement:** The units are subject to 40 CFR 60, Subpart Db and the permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A and Subpart Db, including the NO<sub>x</sub> standards at §60.44b(a).

**Monitoring:** The permittee shall comply with all applicable monitoring and testing requirements of 40 CFR 60, Subpart Db.

**Recordkeeping:** The permittee shall comply with the recordkeeping requirements of 40 CFR 60.49b.

**Reporting:** The permittee shall comply with the reporting requirements of 40 CFR 60.49b and the Section B110 of the permit.

E. 40 CFR 60, Subpart Dc (Units RHTR1 to RHTR3, and SHTR1 to SHTR12)

**Requirement:** The units are subject to 40 CFR 60, Subpart Dc and the permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A and Subpart Dc.

**Monitoring:** The permittee shall comply with all applicable monitoring and testing requirements of 40 CFR 60, Subpart Dc.

**Recordkeeping:** The permittee shall comply with the recordkeeping requirements of 40 CFR 60.48c.

**Reporting:** The permittee shall comply with the reporting requirements of 40 CFR 60.48c and the Section B110 of the permit.

F. 40 CFR 63, MACT Subpart DDDDD, Industrial, Commercial, and Institutional Boilers and Process Heaters (CHTR1 to CHTR3, RHTR1 to RHTR3, and SHTR1 to SHTR12)

**Requirement:** The units are subject to 40 CFR 63, Subpart DDDDD and the permittee shall comply with the applicable requirements of 40 CFR 63, Subpart A and Subpart DDDDD. The units are designed to burn gas 1 fuels and shall comply with work practice standards in Table 3 as specified at §63.7500(e) and §63.7540.

**Monitoring:** The permittee shall comply with all applicable monitoring and testing requirements of 40 CFR 63, Subpart A and Subpart DDDDD.

**Recordkeeping:** The permittee shall comply with the applicable recordkeeping requirements of 40 CFR 63, Subpart A and Subpart DDDDD.

**Reporting:** The permittee shall comply with the applicable reporting requirements of 40 CFR 63, Subpart A and Subpart DDDDD and the Section B110 of the permit.

**A205 Turbines****A. Initial Compliance Test (Units TUR1 to TUR4)**

**Requirement:** Compliance with the allowable emission limits in Table 106.A and BACT controls in Table 105.A and BACT Limits in Table 106.B shall be demonstrated by performing initial compliance testing.

**Monitoring:** The permittee shall perform an initial compliance test in accordance with the General Testing Requirements of Section B111. Emission testing is required for NO<sub>x</sub> and CO. Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.

The monitoring exemptions of Section B108 do not apply to this requirement.

**Recordkeeping:** The permittee shall maintain records in accordance with applicable Sections in B109, B110, and B110.

**Reporting:** The permittee shall report in accordance with the applicable Sections in B109, B110, and B111.

**B. Periodic Emissions Tests (Units TUR1 to TUR4)**

**Requirement:** Compliance with the allowable emission limits in Table 106.A and BACT controls in Table 105.A and BACT Limits in Table 106.B shall be demonstrated by conducting periodic emission tests during the monitoring period.

**Monitoring:** The permittee shall test using a portable analyzer or EPA Reference Methods subject to the requirements and limitations of Section B108, General Monitoring Requirements. Emission testing is required for NO<sub>x</sub> and CO. Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.

(1) The testing shall be conducted as follows:

- (a) Testing frequency shall be once per year.
- (b) The monitoring period is defined as a calendar year.

(2) The first test shall occur within the first monitoring period occurring after permit issuance, or within the first monitoring period after completion of the initial compliance test.

(3) All subsequent testing shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period.

(4) The permittee shall follow the General Testing Procedures of Section B111.

(5) Performance testing required by 40 CFR 60, Subpart KKKK may be used to satisfy these periodic testing requirements if they meet the requirements of this condition and are completed during the specified monitoring period.

**Recordkeeping:**

- (1) The permittee shall maintain records in accordance with Section B109, B110 and B111. The permittee shall also record the results of the periodic emissions tests, including the

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| turbine's fuel flow rate and horsepower at the time of the test, and the type of fuel fired (natural gas).  |
| (2) The permittee shall also keep records of all raw data used to determine exhaust gas flow and of all calculations used to determine flow rates and mass emissions rates. |
| <b>Reporting:</b> The permittee shall report in accordance with Sections B109, B110, and B111.  |

C. Catalytic Reduction and Oxidation Operation (Units CAT1 to CAT4 for Units TUR1 to TUR4)

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| <b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A and BACT controls in Table 105.A and BACT Limits in Table 106.B shall be demonstrated by the following:   |
| (1) The units shall be equipped and operated with Selective Catalytic Reduction (SCR) to control NO <sub>x</sub> emissions; and  |
| (2) Oxidation Catalyst to control CO, VOC, and HAP emissions.  |
| The permittee shall maintain the units according to manufacturer's or supplier's recommended maintenance, including replacement of oxygen sensor as necessary for oxygen-based controllers.  |
| <b>Monitoring:</b> The units shall be operated with the selective catalytic reduction and catalytic oxidation, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation. |
| <b>Recordkeeping:</b> The permittee shall maintain records in accordance with Section B109.  |
| <b>Reporting:</b> The permittee shall report in accordance with Section B110.  |

D. Good Combustion Practices (GCP) and Operation (Units TUR1 to TUR4)

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| <b>Requirement:</b> To demonstrate compliance with the BACT limits in Table 106.B, including BACT for PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , H <sub>2</sub> SO <sub>4</sub> , and CO <sub>2e</sub> the permittee shall meet the following Good Combustion Practices (GCPs). |
| (1) Each turbine shall be a "new" turbine based on turbine technical data sheets provided in the permit application to the Department.  |
| (2) The permittee shall operate each turbine at the combustion conditions recommended by the manufacturer.  |
| (3) Each turbine shall be maintained and tuned at least once per 12-months, or more frequently if recommended by the manufacturer.  |
| (4) The permittee shall meet the manufacturer's specifications and recommended maintenance and tune up requirements.  |
| (5) Each turbine shall combust only the BACT pipeline quality natural gas as defined in this permit (0.75 gr S/100scf).   |
| (6) To ensure on-going good combustion practice of the units, the permittee shall update the inspection and maintenance protocol as needed based on operational experience with the units.  |

**Monitoring:** At a minimum, the permittee shall complete the following monitoring according to the turbine operation and maintenance protocol:

- (1) Monitor the air to fuel ratio, oxygen range, and temperature as specified by turbine design protocol and operating parameters provided and approved in the application and any updates to the protocol,
- (2) Complete any additional monitoring to properly update turbine operations to meet the intended approved design parameters.

**Recordkeeping:**

- (1) The permittee shall maintain a copy of the manufacturer's engine specifications and recommended maintenance and tune-up requirements along with a written site-specific inspection and maintenance protocol.
- (2) The permittee shall maintain records of the dates and the results of monitoring of the air to fuel ratio, oxygen range, and temperature; and the tune ups and maintenance.
- (3) The permittee shall maintain records in accordance with Section B109.

**Reporting:** The permittee shall report in accordance with Section B110.

- E. Ammonia Injection for Selective Catalytic Reduction (SCR) (Units TUR1 to TUR4 and their control Units CAT1 to CAT4)

**Requirement:** Compliance with the allowable emission limits in Table 106.C, Table 106.A and BACT controls in Table 105.A and BACT Limits in Table 106.B shall be demonstrated by the following:

- (1) Ammonia injection to the SCR (Units CAT1 to CAT4) shall commence when the inlet temperature to the ammonia injection grid has exceeded 582 °F. This condition is included to reduce NO<sub>x</sub> emissions during startup.
- (2) The facility shall not store or use aqueous ammonia in concentrations greater than 19% in CAT1 to CAT4. However, if aqueous ammonia in concentrations greater than 20% is utilized, storage shall be limited to 20,000 pounds.
- (3) Annual compliance testing is required on the turbine Stacks TUR1 to TUR4 for ammonia using EPA method CTM-027 or another Department-approved method. When the measured concentration equals or exceeds 75% of the permitted limit, the permittee shall determine the catalyst activity and schedule replacement in accordance with the procedures required in A205.C for catalyst maintenance.

**Monitoring:** The permittee shall monitor the quantity of aqueous ammonia injected into each SCR system (CAT1 to CAT4) on an hourly basis.

**Recordkeeping:**

- (1) The ammonia injection systems shall be inspected on a daily basis to insure proper operation.
- (2) The permittee shall maintain records of the following requirements using data from the annual compliance test to demonstrate compliance with established emission limits:
  - i) The hourly (lb/hr) ammonia emission rate observed for each turbine during the most recent annual compliance test.

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| <p>ii) The daily-rolling 365-day total tons/year ammonia for each turbine unit calculated by the daily hours of operation times the hourly emission rate observed during the most recent annual compliance test (updated monthly by the 15<sup>th</sup> of the following month).</p> |
| <p><b>Reporting:</b> The permittee shall report in accordance with Section B110.</p>   |

F. 40 CFR 60, Subpart KKKK (Units TUR1 to TUR4)

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| <p><b>Requirement</b> The units are subject to 40 CFR 60, Subpart KKKK and the permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A and Subpart KKKK; including NOx emission standards at §60.4320(a) and Table 1; and SO2 emission standards at §60.4330(a)(1) and (a)(2).</p> |
| <p><b>Monitoring:</b> The permittee shall comply with all applicable monitoring and testing requirements, including but not limited to 40 CFR 60.4333.</p>   |
| <p><b>Recordkeeping:</b> The permittee shall comply with all applicable recordkeeping requirements of KKKK, including but not limited to 40 CFR 60.7.</p>  |
| <p><b>Reporting:</b> The permittee shall comply with all applicable reporting requirements of KKKK, including but not limited to 40 CFR 60.4375, §60.4395, and §60.7.</p>  |

G. 40 CFR 63, Subpart YYYY (Units TUR1 to TUR4)

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| <p><b>Requirement:</b> The units will be subject to 40 CFR 63, Subparts A and YYYY according to the applicability criteria at 40 CFR 63.6085. The permittee shall comply with any applicable notification requirements in Subpart A and any specific requirements of Subpart YYYY; including §63.6100 emissions limitations for formaldehyde and operating limitations according to Tables 1 and 2.</p> |
| <p><b>Monitoring:</b> The permittee shall comply with all applicable monitoring requirements of 40 CFR 63, Subpart A and Subpart YYYY.</p>  |
| <p><b>Recordkeeping:</b> The permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63, Subpart A and Subpart YYYY, including but not limited to §63.6155 and §63.10.</p>  |
| <p><b>Reporting:</b> The permittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and YYYY, including but not limited to §63.6145, §63.6150, §63.9, and §63.10.</p>  |

**A206 Flares, Thermal Oxidizers, and Enclosed Combustion Devices**

A. Visible Emissions Monitoring (20.2.61 NMAC) (Units FL1, FL2, FL3, TO1 to TO3, and ECD1)

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| <p><b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A and BACT controls in Table 105.A and BACT Limits in Table 106.B shall be demonstrated by the flares, thermal oxidizers, and enclosed combustion device being equipped with a system to ensure that they are either operated with a flame present at all times or have automatic spark ignition systems that ensure operation with no visible emissions.</p> <p>Units FL1 to FL3, TO1 to TO3, and ECD1 are subject to the 20% opacity standards in 20.2.61 NMAC and complying with the no visible emissions requirements demonstrates compliance with 20.2.61 NMAC opacity limit.</p> |
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**Monitoring:****(1) Units with Pilot Flame:**

The permittee shall continuously monitor the presence of a pilot flame using a thermocouple or any equivalent device approved by the Department and shall be equipped with a continuous recorder and alarm or equivalent, to detect the presence of a flame.

**(2) Units without Pilot Flame (FL3):**

The permittee shall ensure that for units with spark ignition, that the sparking mechanism functions properly as designed. The sparking mechanism shall be tested semi-annually to verify that it functions. If at any time gas flow to the unit is detected (per Condition A206.D) but ignition has not occurred, the unit shall be immediately shut down and all gas flow stopped.

**(3) Visible Emissions for units running continuously (ECD1, TO1 to TO3):**

Annually, the permittee shall conduct a visible emissions observation in accordance with the requirements at 40 CFR 60, Appendix A, Reference Method 22 to certify compliance with the no visible emission requirement on the process flare or combustion unit. The observation period is at least 2 consecutive hours where visible emissions are not to exceed a total of 5 minutes during any 2 consecutive hours.

**(4) Visible Emissions for units operating during blowdown events (FL1, FL2, FL3):**

At least once per year during a blow down event, the permittee shall conduct a visible emissions observation in accordance with the requirements at 40 CFR 60, Appendix A, Reference Method 22 to certify compliance with the no visible emission requirements. Each Method 22 test shall occur for the duration of the blow down event or for 30 minutes, whichever is less. Visible emissions shall not occur for more than 5 minutes during any consecutive 30-minute period. For blowdown events that occur for less than 30 minutes, visible emissions shall not occur for more the 15% during the duration of the blow down event.

If a flare is used only for emergencies, and/or where there are no scheduled blowdown-maintenance events to observe flare combustion, the permittee shall at a minimum conduct the visible emissions observation in accordance with the requirements of EPA Method 22 on the pilot flame.

**Recordkeeping:****(1) Units with Pilot Flame:**

The permittee shall record all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and maintenance activities.

**(2) Units without Pilot Flame (FL3):**

The permittee shall record results of semi-annual spark ignition testing and make a record of all times in which the sparking mechanism fails, and record any repairs needed to make the sparking mechanism functional again.

**(3) Visible Emissions for units running continuously (ECD1, TO1 to TO3):**

For any visible emissions observations conducted in accordance with EPA Method 22, the permittee shall record the information on the form referenced in EPA Method 22, Section 11.2.

**(4) Visible Emissions for units operating during blowdown events (FL1, FL2, FL3):**

For any visible emissions observations conducted in accordance with EPA Method 22, record the information on the form referenced in EPA Method 22, Section 11.2. If the visible emissions observation was conducted only on the pilot flame, the record shall also include the reasons that the test could not be conducted during a blowdown event.

**Reporting:** The permittee shall report in accordance with Condition B110.

**B. Gas Flow Monitoring and Gas Analysis for Flares, Thermal Oxidizers, and Enclosed Combustion Devices (Units FL1, FL2, FL3, TO1, TO2, TO3, and ECD1)**

**Requirement:** Compliance with flare allowable pilot/purge emission limits, and emission limits for thermal oxidizers and enclosed combustion devices in Table 106.A, emissions in Table 107.A, BACT controls in Table 105.A, and BACT Limits in Table 106.B shall be demonstrated by completing the monitoring, recordkeeping, and reporting required by this condition and Condition A206.C. All flow meters and inline chemical composition analyzers shall be installed, calibrated, operated and maintained in accordance with the requirements of Condition B108.H. For Flares, in addition to the individual flare pilot/purge limits in Table 106.A, the combined pilot/purge limits of all three flares (FL1, FL2, and FL3) shown in Table 106.A shall not be exceeded.

**Monitoring:**

**(1) Gas Flow:**

- (a) One or more gas flowmeters equipped with a chart recorder or data logger (electronic storage) shall be installed to continuously monitor the flow (scf) of gas to each flare, each thermal oxidizer, and to the enclosed combustion device.
- (b) Pilot, purge, and assist gas, if applicable, shall be monitored using gas flowmeter under paragraph (a) or determined using manufacturer's specifications or engineering estimates.

**(2) Gas Analysis:**

- (a) Once per calendar year the permittee shall perform a gas analysis, including measurement of the H<sub>2</sub>S content, total sulfur content, VOC content, CH<sub>4</sub> content, CO<sub>2</sub> content, and heating value (BTU/scf) of gas sent to each of the flares, thermal oxidizers, and enclosed combustion device for combustion. Gas analyses shall be separated by a minimum of six (6) months. Gas analyses as required by Condition A108.D, gas inlet, NGL inlet, and oil inlet shall be used if they also meet the requirements of this condition.
- (b) Alternatively, for H<sub>2</sub>S only, in lieu of an annual analysis, H<sub>2</sub>S may be measured quarterly using a stain tube(s) of the appropriate size range or with an inline chemical composition analyzer.

**(3) Calibration:** In addition to the requirements of Condition B108.H, flowmeters and inline chemical composition analyzers shall be operated, calibrated, and maintained as

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| <p>specified by the site-specific operations and maintenance plan, if applicable.</p>  |
| <p><b>Recordkeeping:</b> The following records shall be maintained in accordance with Condition B109.</p> <p><b>(1) Gas Flow:</b></p> <ul style="list-style-type: none"> <li>(a) Records of continuous flowmeter measurements and the hourly flow rate in scf/hr calculated by averaging <i>a minimum</i> of four (4) equally spaced readings for each hour.</li> <li>(b) Manufacturer’s specifications or engineering estimates used for pilot, purge, and assist (if applicable) gas flow rates.</li> </ul> <p><b>(2) Gas Analysis:</b> All sample documentation received from the laboratory or testing service company, including H<sub>2</sub>S content, the total sulfur content, the VOC content, and the heating value (BTU/scf), analysis method utilized, and sample chain of custody. If stain tubes are used for measuring H<sub>2</sub>S content, records of the results, including size range of stain tubes used, the date of the test, and the name of the person conducting the test.</p> <p><b>(3) Calibration:</b> Records of all flowmeter and inline monitor certifications, calibrations, data capture calculations and documentation as specified by Condition B108.H, as well as any breakdowns, reasons for the breakdown, and corrective actions. The permittee shall also maintain a copy of the manufacturer specifications for operation and calibration or the site-specific operations and maintenance plan for flowmeters and inline monitors.</p> |
| <p><b>Reporting:</b> The permittee shall report in accordance with Condition B110.</p>   |

C. Emissions Calculations for Flares, Thermal Oxidizers, and Enclosed Combustion Devices (Units FL1, FL2, FL3, TO1, TO2, TO3, and ECD1)

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| <p><b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A, emissions in Table 107.A, BACT controls in Table 105.A, and BACT Limits in Table 106.B shall be demonstrated by operating each of the flares, thermal oxidizers, and enclosed combustion device in accordance with the requirements, monitoring, and recordkeeping of Condition A206.A and completing emissions calculations as specified in this condition.</p>  |
| <p><b>Monitoring:</b> Compliance is demonstrated through keeping records.</p>  |
| <p><b>Recordkeeping:</b> The permittee shall maintain records of all calculations and parameters used to determine emission rates in spreadsheet (or similar compatible) format and in accordance with Condition B109.</p> <p><b>(1) Hourly Emissions Calculations:</b> The permittee shall calculate the pounds per hour (pph) NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and H<sub>2</sub>S emission rates using these parameters:</p> <ul style="list-style-type: none"> <li>(a) the calculated average hourly flow rate of all gas combusted by the flare, including pilot, purge, and assist gas, if applicable, from Condition A206.A;</li> <li>(b) gas analysis, including H<sub>2</sub>S content, total sulfur content, VOC content, and heating value (BTU/scf) of the gas from Condition A206.A;</li> <li>(c) the emission factors represented in the permit application and approved by the Department, for NO<sub>x</sub> and CO emission rates; and</li> </ul> |

(d) VOC and H<sub>2</sub>S emission rates calculated using the destruction efficiency represented in the permit application and approved by the Department.

**(2) Annual Emissions Calculations:** The permittee shall calculate the total ton per year (tpy) emission rates as a monthly rolling 12-month total, using the totaled pph emission rates for each hour of the month:

- (a) During the first 12 months of this condition taking effect, the permittee shall record the total tons of NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and H<sub>2</sub>S emissions.
- (b) After the first 12 months of this condition taking effect, the permittee shall record the monthly rolling 12-month total tpy NO<sub>x</sub>, CO, VOC, SO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and H<sub>2</sub>S emissions.

**Reporting:** The permittee shall report in accordance with Section B110.

#### D. Flares Used for Emergencies Only (Unit FL3)

**Requirement:** To determine the actual pound per hour and ton per year emissions for flare Unit FL3 using spark ignition and that is used only for emergencies, the permittee shall install a flow meter to continuously measure all gas flows to the flare. This is to determine excess emissions pursuant to 20.2.7 NMAC; to determine if the source is subject to 20.2.70, 20.2.74, 20.2.79 NMAC; and to determine if the source is a major Title V HAP source pursuant to 40 CFR 61 and/or 40 CFR 63.

**Monitoring:** The permittee shall continuously monitor the flow of all gas streams routed to the flare.

**Recordkeeping:** The permittee shall maintain records of the actual pound per hour and ton per year emission rates of each regulated air pollutant from the flare, used to report excess emissions pursuant to the requirements at 20.2.7 NMAC.

**Reporting:** The permittee shall report in accordance with the requirements of 20.2.7 NMAC.

#### E. Flare Good Combustion Practices (GCP) Operating Requirements and BACT Requirements, 40 CFR 60, Subpart A, and 20.2.61 NMAC (Units FL1, FL2, and FL3)

**Requirement:** Compliance with the flare BACT controls in Table 105.A, the allowable emission limits in Table 106.A, BACT limits in Table 106.B, emissions limits in Table 107.A, and BACT Limits in Table 107.A shall be demonstrated by:

Each flare complying with the operational requirements (including but not limited to flame presence and no visible emissions) specified by the general control device requirements at 40 CFR §60.18. Compliance with the operating requirements of 40 CFR 60 demonstrates compliance with the opacity limits required by 20.2.61 NMAC.

**Monitoring:** The permittee shall monitor flare operation of each flare in accordance the applicable requirements at 40 CFR 60.18, including but not limited to §60.18(c)(1) operated with no visible emissions, and §60.18(c)(2) operated with a flame present at all times. Flare FL3 being a spark ignited flare shall meet these requirements when it is operating.

**Recordkeeping:** The permittee shall maintain records of flare operation for each flare in accordance with the applicable requirements of 40 CFR §60.18 and with the requirements of Section B109.

**Reporting:** The permittee shall report in accordance with the requirements of Section B110.

F. Thermal Oxidizer Good Combustion Practices (GCP), General Operating Requirements, BACT Requirements, and 20.2.61 NMAC (Units TO1 to TO3)

**Requirement:** Compliance with the thermal oxidizer the allowable emission limits in Table 106.A, BACT limits in Table 106.B, and BACT controls in Table 105.A, shall be demonstrated by:

- (1) The permittee shall ensure that all emissions from the amine units (Units AU1 to AU3) are at all times routed to the thermal oxidizers (Units TO1 to TO3) according to this condition and Condition A208.A. The thermal oxidizers shall be equipped with a piezoelectric igniter and shall be operational at all times emissions are sent to them. The thermal oxidizers shall be installed, operated, and maintained according to manufacturer's specifications.
- (2) The thermal oxidizers shall be operated such that no visible emissions are observed, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

**Monitoring:**

- (1) The permittee shall inspect the amine flash tanks, still vents, and the control equipment semi-annually to ensure they are routed and operating in accordance with Condition A208.A, and that the thermal oxidizers are operating in accordance with the manufacturer's recommended operating and maintenance procedures.
- (2) Annually, the permittee shall perform a visible emissions observation in accordance with the requirements of EPA Method 22 to certify compliance with the visible emission requirements. The observation period shall be two hours.

**Recordkeeping:**

- (1) The permittee shall record the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the amine units and thermal oxidizers into compliance. The permittee shall maintain a copy of the manufacturer's maintenance recommendations.
- (2) The results of the visible emissions observation shall be recorded on the form referenced by EPA Method 22, Section 11.2.

**Reporting:** The permittee shall report in accordance with Section B110.

G. Thermal oxidizer and Enclosed Combustion Device Initial Compliance Tests (Units TO1 to TO3 and ECD1)

**Requirement:** To demonstrate compliance with the allowable emission limits in Table 106.A, and BACT limits in Table 106.B, and BACT controls in Table 105.A, the permittee shall perform an initial compliance test on the thermal oxidizer emissions stacks and the enclosed combustion device emissions stack. During the test all amine unit still vent and flash gas streams, authorized by this permit, shall be routed to the thermal oxidizers during the tests; and all tanks, authorized by this permit, shall be vented/routed to the enclosed combustion device during the test. If these conditions are not physically possible at the time the compliance testing is due pursuant to Condition B111.A(2), the permittee shall meet the requirements at B111.A(4) until another compliance test is completed.

**Monitoring:** The permittee shall perform the initial compliance tests in accordance with the General Testing Requirements of Section B111. Emission testing is required for NO<sub>x</sub>, CO, and VOCs.

**Recordkeeping:** The permittee shall maintain records in accordance with the applicable Sections in B109, B110, and B111.

**Reporting:** The permittee shall report in accordance with the applicable Sections in B109, B110, and B111.

H. Enclosed Combustion Device Good Combustion Practices (GCP), General Operating Requirements, BACT Requirements, and 20.2.61 NMAC (Unit ECD1)

**Requirement:** Compliance with the enclosed combustion device allowable emission limits in Table 106.A, BACT limits in Table 106.B, and BACT controls in Table 105.A, shall be demonstrated by:

- (1) The permittee shall ensure that all emissions from storage tanks and vessels including the oil storage tanks (OTK1 to OTK6), slop oil tank (OTK7), gun barrel tank (GBS1), produced water tanks (PWTK1 to PWTK2), produced water loading (PWTL), and slop oil loading (OTL) are at all times routed to the enclosed combustion device (Unit ECD1) per Conditions A203A and A203.F. The combustor shall be equipped with a piezoelectric igniter and shall be operational at all times emissions are sent to it.
- (2) The combustor shall be operated such that no visible emissions are observed, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

**Monitoring:**

- (1) The permittee shall inspect that all tanks are routed/vented to the control equipment semi-annually to ensure all routing/venting is in accordance with Conditions A203.A and A203.F, and that the ECD1 is operating in accordance and the manufacturer's recommended operating and maintenance procedures.
- (2) Annually, the permittee shall perform a visible emissions observation in accordance with the requirements of EPA Method 22 to certify compliance with the visible emission requirements. The observation period shall be two hours.

**Recordkeeping:**

- (1) The permittee shall record the inspection and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the tanks and the ECD1 into compliance. The permittee shall maintain a copy of the manufacturer's maintenance recommendations.
- (2) The results of the visible emissions observation shall be recorded on the form referenced by EPA Method 22, Section 11.2.

**Reporting:** The permittee shall report in accordance with Section B110.

I. Flare Construction and Stack Height (Units FL1, FL2, and FL3)

**Requirement:** Compliance with the applicable NMAAQS, NAAQS, and PSD increments for Class I and Class II Areas shall be demonstrated by constructing each of the flare Units FL1,

FL2, and FL3 to the parameters used in the Air Dispersion Modeling. The flare height shall be a minimum of 170 feet above ground for each flare. All facility equipment that is routed to the flares shall be connected by hard piping to each of the flares. Each flare must be constructed as described in the permit application, including the dual tip design, and any/all subsequent materials submitted by the applicant.

**Monitoring:** The permittee shall construct each of the flares as required and maintain a copy of the stamped engineering specification sheet and as-built drawing.

**Recordkeeping:** Records shall be kept of the post-construction inspections, engineering stamped specification sheets, and as-built drawing.

**Reporting:** The permittee shall report in accordance with Condition B110.

### A207 Sulfur Recovery Unit – Not Required

### A208 Amine Units

#### A. Operating and Control Requirements (Units AU1, AU2, and AU3)

**Requirement:** Compliance with the allowable emission limits in Table 106.A and with the BACT control requirements in Table 105.A shall be demonstrated by:

- (1) Inspecting all amine unit equipment components (including the amine contactor, flash tank(s), amine tanks, amine pumping system, and amine still) semi-annually for proper function and operation.
- (2) Emissions from the amine still vents shall be routed at all times to the thermal oxidizers (Units TO1 to TO3).
- (3) Flash tank emissions shall be recovered and sent to the thermal oxidizers (TO1 to TO3) at all times.
- (4) At no time shall amine unit emissions from the still vents or flash tanks be vented directly to the atmosphere.

**Monitoring:** Semi-annually, the permittee shall inspect all amine unit equipment components for proper operation and function and to ensure that the flash tank emissions and amine unit still overhead vents are routed at all times to their control devices.

**Recordkeeping:** The permittee shall maintain a record of the semi-annual inspections, any deviations from the requirements of this condition, and any necessary repairs.

**Reporting:** The permittee shall report in accordance with Section B110.

#### B. Gas Throughput (Units AU1, AU2, and AU3)

**Requirement:** Compliance with the allowable VOC and H<sub>2</sub>S emission limits in Table 106.A, and with the BACT control requirements in Table 105.A shall be demonstrated by each unit inlet gas stream not exceeding 250 MMscf/day. The permittee shall install, calibrate and maintain a flow meter that measures the flow rate of gas into each of the contactors.

**Monitoring:**

- (1) The permittee shall calibrate the flow meter semi-annually, and shall install, calibrate,

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| operate and maintain the flow meter according to the manufacturer's procedures and in accordance with applicable specifications in Section B108.H. |
| (2) The permittee shall monitor the natural gas flow rate daily (in units of MMscf/day).   |
| <b>Recordkeeping:</b> The permittee shall keep records in accordance with Section B109, and of the following:                                      |
| (1) Flow meter calibration results;  |
| (2) Daily total of natural gas throughput each day for each amine unit in units of MMscf/day.  |
| <b>Reporting:</b> The permittee shall report in accordance with Section B110.  |

C. Amine pump circulation rate (Units AU1, AU2, and AU3)

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| <b>Requirement:</b> Compliance with the allowable VOC and H2S emission limits in Table 106.A, and with the BACT control requirements in Table 105.A shall be demonstrated by the amine pump circulation rate for each unit not exceeding 600 gallons per minute (gpm). |
| <b>Monitoring:</b> The permittee shall monitor the circulation rate (gpm) on a monthly basis.  |
| <b>Recordkeeping:</b> The permittee shall keep records in accordance with Section B109 and of the following:   |
| (1) Pump flow rate in gpm.   |
| (2) Basis for determination of flowrate.   |
| <b>Reporting:</b> The permittee shall report in accordance with Section B110.  |

D. 40 CFR 60, Subpart OOOOa (Units AU1, AU2, and AU3)

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| <b>Requirement:</b> The units are subject to 40 CFR 60, Subpart OOOOa at §60.5365a(g). Since each unit design capacity will be less than 2 long tons per day (LT/D) of hydrogen sulfide (§60.5365a(g)(3)) in the acid gas (expressed as sulfur), the permittee shall ensure that each unit complies with recordkeeping and reporting requirements specified in §60.5423a(c) but are not required to comply with standards and monitoring at §60.5405a through §60.5407a and §60.5410a(g) and §60.5415a(g). |
| <b>Monitoring:</b> The permittee shall maintain records as described below to demonstrate facility is exempt from monitoring.  |
| <b>Recordkeeping:</b> The permittee shall generate and maintain the records required by 40 CFR 60.5420a, and §60.5423a(c) to demonstrate exemptions found in 40 CFR 60.5365a(g)(3) from standards, test methods, and monitoring in §60.5405a through §60.5407a, §60.5410a(g), and §60.5415a(g) (if applicable).  |
| <b>Reporting:</b> The permittee shall meet all applicable reporting in 40 CFR 60, Subpart A, in §60.5423a(b) and in Section B110.  |

## A209 Fugitives – Equipment Leak Standards

A. 40 CFR 60, Subpart OOOOa for Unit FUG (which includes named Units CRYO1 to CRYO3, and MOL1 to MOL3)

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| <b>Requirement:</b> The Unit FUG is subject to 40 CFR 60, Subparts A and OOOOa because it will be an affected facility constructed after the applicability date in 40 CFR 60.5365a and the permittee shall comply with the notification requirements in Subpart A and the specific |
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requirements of Subpart OOOOa, including standards in §60.5400a. Unit FUG includes the three cryogenic trains (CRYO1 to CRYO3), the three molecular sieve dehydrators (MOL1 TO MOL3), and any/all associated piping, connections, flanges, etc. that are part of the natural gas liquids process units.

**Monitoring:** The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5410a and §60.5415a.

**Recordkeeping:** The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a.

**Reporting:** The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a, and in Section B110.

### **A210 Compressors - Reciprocating**

- A. 40 CFR 60, Subpart OOOOa (Reciprocating compressors for stabilization gas (ESTCOMP1 to ESTCOMP17) and for instrument air (EIACOMP1 to EIACOMP5))

**Requirement:** The reciprocating compressors used for stabilization gas (ESTCOMP1 to ESTCOMP17) and those used for instrument air (EIACOMP1 to EIACOMP5) are subject to the rule at §60.5365a(c). The permittee shall comply with the notification requirements of 40 CFR 60, Subpart A and the specific requirements of Subpart OOOOa, including standards in §60.5385a.

**Monitoring:** The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5410a, §60.5411a, §60.5415a, and §60.5416a.

**Recordkeeping:** The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a.

**Reporting:** The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a, and in Section B110.

### **A211 40 CFR 64 – Compliance Assurance Monitoring (CAM)**

- A. Facility Compliance Assurance Monitoring (CAM) Requirements per 40 CFR 64. For this facility the following units will be subject to CAM: Turbines (TUR1-4) and their associated controls (catalytic reduction and oxidation); Amine units (AU1-3) controlled by thermal oxidizers (TO1-3); Oil storage tanks (OTK1-6) controlled by the enclosed combustion device (ECD1); Slop oil tank (OTK7) controlled by the ECD1; and the Gunbarrel separator (GBS1) controlled by the ECD1. CAM is implemented under the Title V (TV) permitting program once a facility becomes operational as a TV major source. This condition is included in NSR PSD-8245 as a required future applicability determination.

## **PART B      GENERAL CONDITIONS (Attached)**

**PART C MISCELLANEOUS: Supporting On-Line Documents; Definitions;  
Acronyms (Attached)**

[DO NOT PRINT GENERAL CONDITIONS AND MISCELLANEOUS UNTIL  
YOU SUBMIT FINAL DOCUMENT FOR SIGNATURE.

FINAL DOCUMENT MUST HAVE PERMIT NUMBER IN HEADER FOR LEGAL  
REASONS AND IT MUST BE SINGLE SIDED LIKE THE PERMIT.]