

Statement of Basis - Narrative

NSR Permit

Type of Permit Action: PSD-Minor Modification

Facility: Eunice Gas Processing Plant

Company: Versado Gas Processors, LLC

Permit No(s): NSR 0067-M11 and P109-R3

Tempo/IDEA ID No.: 609 - PRN20200002

Permit Writer: Olivia Yu

Fee Tracking (not required for Title V)

Tracking	NSR tracking entries completed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	NSR tracking page attached to front cover of permit folder: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Paid Invoice Attached: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Balance Due Invoice Attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Invoice Comments: \$5,038; August 19, 2020

Permit Review	Date to Enforcement: Sept 17, 2020	Date of Enforcement Reply:
	Date to Applicant: Sept 17, 2020	Date of Applicant Reply:
	Date to EPA: N/A	Date of EPA Reply: N/A
	Date to Supervisor: September 3, 2020	

1.0 Plant Process Description:

From the application, "Field natural gas entering the plant is sent through an inlet separator designed to remove entrained solids and dissolved liquids from the field gas stream. Condensate from the inlet is separated and stored (Units TK-1, TK-2, and TK-3) prior to loadout via truck (Units L-01 and L-02). Working and breathing losses and flash losses from the tanks are controlled by a VRU. Loadout emissions are controlled by vapor balancing with the condensate tanks, TK-1 and TK-2. Tank VRU downtime emissions (SSM emissions) are included in this application.

Once the field gas passes through the inlet separator, it is routed to the inlet compressors (Units C-01 to C-13, C-20 to C-22, EC-1, EC-2, and EC-3) to increase the pressure of the gas. The stream will then be sent to an amine treater (Unit AM-01) for the purpose of removing carbon dioxide and hydrogen sulfide entrained in the field gas stream. The supply of steam used as the heat source to regenerate the rich amine is created by the two boilers located at the facility (Units B-01 and B-02). Emissions from the amine still overheads are routed to the AGI well (Unit AGI, AGI-C, and proposed AGI-C2) or the emergency acid gas flare (Unit F-01). The inlet/residue flare (Unit F-02) and the acid gas flare (Unit F-01) are used for SSM and malfunction emissions.

After the amine treating, the field gas is sent to a TEG dehydration system (Unit G-01) for the purpose of removing water from the gas stream. A TEG regeneration heater (Unit RH-E) is used to regenerate the rich TEG. Please note Unit RH-W is used as a standby regeneration heater for the dehydration system. TEG regenerator emissions are re-routed to the inlet. The TEG dehydrator system is a completely closed system and has two vapor recovery units controlling the emissions from the unit. When one VRU goes down the second VRU will control the TEG dehydrator. The gas is then sent to multiple mole sieve adsorption towers for additional water removal. One or more towers will be in dehydration mode while one or more are in regeneration mode. The towers contain a solid desiccant material that removes the moisture contained within the field gas stream prior to entrance into the cryogenic unit.

Natural gas liquids (NGL) recovery is achieved through a cryogenic process where the liquid-rich field gas temperature is dropped drastically. This rapid temperature drop condenses out the ethane and heavier NGL's while at the same time maintaining methane in gas form (residue gas). The resulting condensed liquid consists of a marketable NGL Y-Grade product that will be sent to market via pipeline.

The dry, pipeline quality residue gas (consisting of primarily methane) from the top of the demethanizer tower is sent to the suction header of high pressure pipeline compressors (Units C-13A and C-17 to C-19) and low pressure pipeline compressors (Units C-20-22). The residue gas is then compressed up to a pressure high enough for delivery into a high pressure and low pressure natural gas (sales) pipeline.

Please note the large boilers (B-01 and B-02) and the regenerator heater (H-02) send heat to multiple processes at the facility."

The Eunice Gas Processing Plant consists of the following regulated equipment:

- thirteen (13), uncontrolled, 2SLB RICE, natural gas-fired compressor engines: 1,200 hp for Units C-01 to C-09; 1,600 hp for Units C-10 to C-12, and 2,050 hp for Unit C-13
- seven (7) 4SRB RICE, natural gas-fired compressor engines: all 1,200 hp and fitted with Non-Selective Reduction (NSCR) catalytic converters: Units C-13A and C-17 to C-22
- three (3) electric motor-driven compressors (EC-1 to EC-3): all 3,000 hp
- two (2) 100 MMBtu/h steam boilers (B-01 & B-02)
- four (4) process heaters: Unit RH-W (10 MMBtu/h); Unit RH-E (3.5 MMBtu/h); Unit H-01 (1.25 MMBtu/h); and Unit H-02 (2.7 MMscf/y)
- one (1) glycol dehydrator with capacity of 150 MMscf/d (G-01)
- two (2) 500 bbl condensate storage tanks (TK-1 & TK-2) with one (1) 500 bbl gunbarrel (an integrated 3-tank system controlled by VRU-3)
- one (1) 2,800 gallon gasoline storage tank (ME-9)
- one (1) amine unit with 550 gpm capacity (AM-01)
- one (1) cooling tower with 14,100 gpm capacity (CT-1)
- one (1) 5 MMscf/yr acid gas flare (F-01)
- one (1) facility inlet/residue flare for emergencies (F-02)
- one (1) acid gas well system with two (2) electric motor-driven compressors (AGI, AGI-C1, AGI-C2)
- one (1) 1,341 hp diesel emergency generator (EG-01)
- one (1) 125 hp diesel air compressor (EG-02)
- two (2) loading area emissions units (L-01 & L-02)
- various sourced SSM emissions: vessel purging (SSM-VP); compressors' blowdowns (SSM-CB); pump purging (SSM-PP); tank VRU downtime (SSM-VRU); AGI-C2 compressor blowdowns (SSM-AGI-C2)
- fugitive emissions; and a NGL Processing Train which is a source of fugitive VOC and HAP fugitive emissions

2.0 Description of this Modification:

This modification is for a proposed increase in condensate throughput in TK-1 and TK-2 from 5,000,000 gallons/year to 7,080,395 gallons/year. During normal operations, emissions from TK-1 and TK-2 are 100% controlled by the VRU. The same VRU also captures 70% of vapor balanced emissions from L-01 and L-02. SSM-VRU emissions are revised from 5% to 3.75% downtime. SSM-VRU emissions represent downtime emissions from tank flashing, breathing, and working and L-01 and L-02. Emission unit SSM-G-01 (dual VRUs for G-01) is requested to be removed from the facility's total PTE.

3.0 Source Determination:

1. The emission sources evaluated include the entire Eunice Gas Processing Plant.

2. Single Source Analysis:
- A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? Yes
 - B. Common Ownership or Control: Are the facilities under common ownership or control? Yes
 - C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes
3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? Yes

4.0 PSD Applicability:

Once a source is PSD major for any single pollutant, all other pollutants, other than non-attainment pollutants, must be evaluated against Table 20.2.74.502 Significant Emission Rate for applicability regardless if that pollutant is over the 100/250 tpy threshold per 20.2.74.200(d)(1), 74.302.A and 302.B NMAC. See Section A, PSD Applicability, of the 1990 Workshop Manual for details, but keep in mind that the regulation has changed since the guidance was published.

- A. The source, as determined in 3.0 above, is **an existing PSD Major Source**.
- B. The project emissions for this modification are **not significant**.
- C. Netting is **not required**.
- D. BACT is **not required for this modification (Minor Mod)**.

From Section 12 of the application:

PSD Applicability Review

Targa proposes to modify the NSR Permit 0067-M9R2 by increasing the annual condensate throughput at the site.

PSD Applicability Steps 1 and 2 – Project Determination and Project Net Increases

For this application, the “project” includes the VRU downtime emissions and loading emissions. This change is not associated with any past projects. The project net emission changes considered for this analysis are described below.

In Step 1 of the PSD applicability review, the net emissions change from the project are compared to the PSD significant emission rate (SER). Any pollutants with a net emissions change that exceeds the respective SER must undergo PSD Netting in Step 2. The project emissions described in this application include the following sources in the below table:

- Condensate Tanks (TK-1 & TK-2);
- VRU Downtime (Unit SSM-VRU); and
- Annual Condensate Loading (Unit L-01 & L-02).

SSM-VRU Baseline Emissions

Year	NO _x (ton/yr)	CO (ton/yr)	VOC (ton/yr)	SO _x (ton/yr)	PM ₁₀ , PM _{2.5} (ton/yr)	H ₂ S (ton/yr)	CO _{2e} (ton/yr)
2017	-	-	1.50	-	-	0.10	-

2018	-	-	1.50	-	-	0.10	-
SSM-VRU Two Year Actual Average (2017 & 2018):	-	-	1.50	-	-	0.10	-

L-01/L-02 Baseline Emissions

Year	NO _x (ton/yr)	CO (ton/yr)	VOC (ton/yr)	SO _x (ton/yr)	PM ₁₀ , PM _{2.5} (ton/yr)	H ₂ S (ton/yr)	CO ₂ e (ton/yr)
2017	-	-	7.13	-	-	-	-
2018	-	-	7.85	-	-	-	-
L-01/L-02 Two Year Actual Average (2017 & 2018):	-	-	7.49	-	-	-	-

SSM-VRU Actuals to PTE¹

Actuals / PTE	NO _x (ton/yr)	CO (ton/yr)	VOC (ton/yr)	SO _x (ton/yr)	PM ₁₀ , PM _{2.5} (ton/yr)	H ₂ S (ton/yr)	CO ₂ e (ton/yr)
Actuals	-	-	1.50	-	-	0.10	-
Proposed PTE	-	-	39.41	-	-	0.42	6.23
SSM-VRU Project Net Emissions Change	-	-	37.91	-	-	0.32	6.23

L-01/L-02 Actuals to PTE¹

Actuals / PTE	NO _x (ton/yr)	CO (ton/yr)	VOC (ton/yr)	SO _x (ton/yr)	PM ₁₀ , PM _{2.5} (ton/yr)	H ₂ S (ton/yr)	CO ₂ e (ton/yr)
Actuals	-	-	7.49	-	-	-	-
Proposed PTE	-	-	8.15	-	-	0.045	0.18
L-02/L-02 Project Net Emissions Change	-	-	0.65	-	-	0.045	0.18

Step 1 - Project Net Emissions Change

Unit	NO _x (ton/yr)	CO (ton/yr)	VOC (ton/yr)	SO _x (ton/yr)	PM ₁₀ , PM _{2.5} (ton/yr)	H ₂ S (ton/yr)	CO ₂ e (ton/yr)

TK-1	-	-	-	-	-	-	-
TK-2	-	-	-	-	-	-	-
SSM-VRU	-	-	37.91	-	-	0.32	6.23
L-01/L-02	-	-	0.65	-	-	0.045	0.18
Project Total	0.00	0.00	38.56	0.00	0.00	0.37	6.41
PSD Significance Thresholds	40	100	40	40	10	10	75000
Are project Emissions Significant?	NO	NO	NO	NO	NO	NO	NO

¹ Past actual and proposed PTE emissions are estimated using the same calculation methodology.

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

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0067-M11*	TBD	PSD minor modification	The proposed change is to increase condensate throughput of condensate tanks (TK-1 and TK-2) from 5,000,000 gal/year to 7,080,395 gal/year. Truck loading emissions (L-01 and L-02) reflecting 30% uncaptured emissions will increase. TK-1, TK-2, L-01, and L-02 will be controlled by VRU and vapor balancing. SSM-VRU reflect 3.75% downtime. Emission unit SSM-G01 was requested for removal from this permit.
0067-M10	TBD	PSD minor modification	The redundant acid gas compressor (AGI-C2) that will be added, driven by an electric motor, is due to Settlement Agreement and Stipulated Final Compliance Order (NOV TAR-0610-1701). Emissions units that are modified as a result are acid gas flare (F-01), facility inlet/residue emergency flare (F-02), and fugitives (FG-01). SSMs due to redundant acid gas compressor blowdowns (SSM-AGI-C2) will be added as a new emissions unit. Unit C-15 has been removed and replaced with 3 electric engines with rotary screw compressors. NSR exempt unit EG-01 was requested for inclusion and subject to NSPS IIII and MACT ZZZZ to correspond with TV P109-R3 language. Extension request was submitted on June 29, 2020 to revise Condition A210 for AGI well system to entirely new A210A and A210B. Extension request granted on July 7, 2020. Revised issuance deadline is September 27, 2020.
0067-M9R3	12/19/2019	NSR Admin Revision	Like kind engine replacement of Unit C-21 with change in manufacturer date of Oct 2008 to April 2005 and SN 266069 to C155801.

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

Permit Number	Issue Date	Action Type	Description of Action (Changes)
P109-R3*	11/29/2019	Title V Renewal (Joe Kimbrell)	This permit supersedes permit P109-R2M1.TV 5-year permit renewal incorporates changes authorized by NSRs 0067-M9 and M9R1, but not NSR 0067-M9R2, per the Applicant's request. Technical Revision NSR 0067-M9R2 was issued on 3/27/2019; but it will be incorporated in a separate TV permit modification since the company is planning another NSR permit revision. NSR 0067-M9R2 and M10 will be incorporated into the next Title V permit.
0067-M9R2	3/27/2019	NSR Technical Revision (Jim Nellessen) complete rewrite of permit	Replace (remove) a 2SLB RICE (Unit C-15, 1100 hp) and its associated compressor with three rotary screw compressors driven by three electric motors, modify associated fugitives (Unit FG-01) and compressor blowdown emissions (Unit SSM-CB). The additional pph fugitive VOC emissions (0.95 pph from FG-01 and SSM-CB combined) are less than 1.0 pph and meet the technical revision threshold. PSD: Project emissions are not significant (2.1 tpy VOC) as this figure is below the 40 tpy significant emission rate threshold. 20.2.74.7.AT NMAC states: "No creditable emission reductions shall be generated from shutting down the existing emissions unit that is replaced." Unit C-15 (5.3 tpy VOC, 7.1 tpy CO, and 20.4 tpy NOx) is being shutdown/replaced; hence the potential applicability of this definition needs to be properly investigated for any future permitting action that might require PSD netting analysis.
0067-M9R1	7/12/2018	NSR Technical Revision (Kirby Olson)	Increased only the fugitive VOCs by 0.44 tpy to account for leaks from new components that will be installed as part of a piping upgrade for the propane service portion of the facility.
0067-M9	4/04/2018	NSR Significant Revision (Kirby Olson)	Added an electric compressor (Unit EC-3). The electric compressor will have blowdown SSM (Unit SSM-CB) and fugitive (Unit FG-01) emissions associated with it. The source is an existing PSD major source, but the project emissions for this modification are not significant; so, neither netting nor BACT is required.
0067-M8R3	12/20/2017	NSR Admin (Teri Waldron)	Like-kind engine replacement for Unit C-18, an Ingersol Rand Gas Compressor, from SN 189879 to new SN 352869.

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

Permit Number	Issue Date	Action Type	Description of Action (Changes)
P109-R2M1*	12/14/2017	Title V- Significant Modification (Kirby Olson)	TV permit incorporated changes from NSR permits 0067-M8, 0067-M7 and 0067-M6R3. Those changes included a addition of SSM emission limits for flare F-02 and various other venting operations; 9 tpy VOC malfunction emissions, and two electric compressors (EC-1 and EC-2). The revisions reduced operation of C-9, C-10, C-11, and C-12 to backup use only (<500 hr/yr). The revisions also included language changes (see history table below); although AQB is modifying language pertaining to compliance order, Stipulated Final Order (SFO) No. AQCA 09-00(CO) (dated 1/6/2010) to indicate that the order was terminated on 3/7/2013, instead of removing the language because two of the requirements that were met must remain as permit conditions: 1) all equipment that could be subject to NSPS KKK (constructed before 2011) is subject to KKK (SFO paragraph V.17); and 2) flares were required to be upgraded, consolidated, retired, or replaced (SFO paragraph V.16). This revision also associated the Malfunction emissions to both Flare F-01 and Flare F-02, so malfunction emissions can be routed to either flare; removed a 1,000 gallon gasoline tank (unit ME8); and added a 2,800 gallon gasoline tank (ME9). Four tanks (ME10-ME13) are added that are Title V Insignificant. Tank ME-6 was removed. The Subpart KKK/OOOO applicability was updated. Serial numbers were corrected for several engines and tanks. This revision also incorporated the admin revision requested on 7/6/16 for a like-kind replacement of engine C-20 (new serial number 250078). Added CAM plan for AM-01. Paragraph V.16 of SFO AQCA 09-00(CO) [dated 1-5-2010, terminated 3/7/13] also required that both flares be upgraded, consolidated, retired, or replaced to comply with the operational standards in 40 CFR 60.18. Jon Lutz checked the compliance and enforcement records on 12/20/16, and verified that the permittee met this condition by replacing the tips on both flares.
0067-M8R2	Withdrawn 11/15/2017	NSR Admin (Kirby Olson)	Proposed switching the roles of two identical compressor engines. Unit C-08 to be designated as backup and limited to 500 hours/year. Unit C-09 to be moved back to full time operating status. Request withdrawn by Targa.
0067-M8R1	8/5/2016	NSR Technical Revision (Kirby Olson)	This modification added a second electric compressor (EC-2) to substitute some of the capacity of engines C-09 and C-12. Engines C-09 and C-12 are restricted to 500 hours/year of operation as a result of this modification. The emission limits for these units were reduced to account for the reduction in operating hours. This modification also incorporated the admin revision requested on 7/6/16 for a like-kind replacement of engine C-20.

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

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0067-M8	6/3/2016	NSR Significant Revision (Kirby Olson)	Associated the already permitted Malfunction emissions to both Flare F-01 and Flare F-02, so malfunction emissions can be routed to either flare. Removed a 1000 gallon gasoline tank (Unit ME8) and added a 2800 gallon gasoline tank (Unit ME9). Tank ME-6 was removed. Four tanks (ME10-ME13) added are NSR exempt. Subpart KKK/ OOOO applicability was updated. Serial numbers corrected for several engines and tanks.
0067-M7	4/15/2015	NSR Significant Revision	1) Added SSM emission limits for flare F-02 and various other venting operations; 2) added 10 tpy VOC malfunction emissions; 3) added electric compressor EC-1; 3) reduced operation of C-10 and C-11 to backup use only (<500 hr/yr); and 4) added fugitives associated with L-02. TK-3 went from regulated equipment to NSR exempt status. No clear documentation. The project emissions for this modification are significant for NOx and VOC. Application did not properly account for all VOC emissions increases. VOC increase for VRU should be 9.8 tpy instead of the 3.6 tpy used in the application. A 6.2 tpy VOC increase from the VRU puts the total project emissions increase at 40.2 tpy. Netting analysis shows the reduction in use of the engines C-10 and C-11 resulted in a net reduction of NOx emissions and a less than significant (<40 tpy) increase in VOC emissions for this permitting action. This permit action also added Units EG-01 and EG-02 to this facility.
0067-M6R3	4/25/2014	NSR Technical Revision	1) Removed Unit SVE-1 (Soil Vapor Extraction (SVE) Unit); 2) Removed Unit I-01 (sulfur recovery unit (SRU) and incinerator); 3) Performed equipment maintenance on Unit AM-01 (amine unit by replacing the heat exchanger and re-tray the absorber tower); 4) renamed Unit RH-01 (SRU regeneration heater) to Unit H-02 (hot oil heater); and 5) removed language pertaining to compliance order, Stipulated Final Order (SFO), No. AQCA 09-00(CO), dated 1/6/2010 that was terminated on 3/7/2013. Permit conditions that were requirements from the SFO and that remained in the permit as continuing requirements are as follows: 1) A206.D Flare upgrade, consolidation, retirement, or replacement for Units F-01 and F-02; 2) A208.D Sulfur monitoring (20.2.35 NMAC) for Unit AM-01 (amine unit reflux accumulator); 3) A209.A and A209.C Current and Future operations – facility-wide fugitives for equipment in VOC or wet gas service and not subject to NSPS KKK for Unit FG-01; and 4) A201.A AGI System and Operation.
P109-R2	4/4/2014	TV Renewal	Renewal incorporated NSR 0067-M6R2 and the following updates: 1) Removed Soil Vapor Extraction (SVE) Unit; 2) Removed SRU and SRU-SSM; 3) Updated serial numbers for 3 tanks; and 4) Removed all references to SFO (compliance order AQCA 09-00(CO), dated 1/6/2010) from the permit.

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

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0067-M6R2	11/13/2013	NSR Technical Revision	Targa seeks to add a new Soil Vapor Extraction (SVE) Unit. The SVE is rich burn, natural-gas fired internal combustion engine that has been modified to draw soil vapors into the intake manifold and burn them along with supplemental natural gas. The SVE is controlled with a three-way catalyst and is expected to operate for less than 60 days on site. The unit is being permitted at 8760 hrs/yr. The unit will be identical to the one used at Kirtland AFB, with site-specific emission factors, based on initial compliance tests reports. The Ford engines are purchased from the manufacturer as NSPS JJJJ compliant engines and the after controls emissions are used as PTE. This project was not PSD Significant Modification and processed as a NSR Tech Rev per 20.2.72.219.B(1)(b) NMAC.
0067-M6R1	5/24/2011	Reopening	This document summarizes changes to four permit conditions that appeared in Permit 0067-M6 (issued 8/8/2010) and requires slight language modifications to make these conditions consistent with the Title V permit, the SFO, and to clarify excess emissions reporting for the amine unit. The changes were requested by Cal Wrangham of Targa, via telephone conversations on 4/20/2011 and 5/24/2011.
0067-M6	8/6/2010	NSR Significant Revision	Initiation of 3 Environmental Improvement Projects as required by the SFO dated 1/6/2010: 1) Installation of AGI by 7/15/2011; 2) Flare upgrade/replacement by 1/15/2012; 3) Leak detection program by 1/15/2012. Also, inclusion of SSM emissions for current SRU Incinerator and future AGI.
P109-R1M1	11/21/2008	TV Admin	Like-kind engine replacement: Units C-18 and C-22.
0067-M5R1	11/21/2008	NSR Admin	Like-kind engine replacement: Units C-18 and C-22.
P109-R1	8/6/2008	Title V Renewal	This renewal will incorporate the changes of NSRs 0067-M5 and 0067-M4R2. For changes in emissions from the last NSR see the Database Summary.
0067-M5	10/4/2007	NSR Significant Revision	0067-M5 increased the amount of allowable sulfur removed by the SRU and increased the short-term SO ₂ emission limit from the thermal oxidizer. This permit also reduced allowable emissions by removing engine C-14, taking credit for installing a catalytic converter on engine C-13A, retiring three existing tanks, and installing two smaller tanks with a VRU. This application also makes minor corrections and updates to contact information, etc. Net changes in emissions are: NO _x = -2,648.4 t/y VOC = -79.5 t/y CO = -388.1 t/y SO ₂ = -1.0 t/y

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

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0067-M4R3	11/22/2006	NSR Technical Revision	This permitting request was denied. The application did not address the affect the proposed reconfiguration of the Sulfur Recovery Unit Air Blower System would have on applicability of 20.2.74NMAC - Prevention of Significant Deterioration or 40 CFR 60 Subpart LLL – Standards of Performance for Onshore Natural Gas Processing: SO2 Emissions. The application also did not include verification of public notice as required by 20.2.72, 203.B NMAC.
0067-M4R2	2/11/2006	NSR Admin	This was an operator and billing party change from Dynegy Midstream Services to Targa Midstream Services LP. Versado Gas Processing remains the owner. This change affects 12 facilities in total.
P109	12/16/2002	New Title V Permit	Title V issued incorporating the terms and conditions of NSR permits 0067 to 0067-M4.
0067-M4R1	7/30/2001	NSR Significant Revision	Replaces the 10 MMBTU/hr heater (Unit RH-E) with a 3.5 MMBTU/hr heater. This change lowers NOx by 11.6 tpy, CO by 2 tpy, and VOCs by 0.22 tpy.
0067-M4	6/5/2000	NSR Modification	No change in conditions or emissions. The modification allowed removal of the SRU tailgas CEMS in lieu of a complex monitoring system outlines in a Dynegy-written document referred to as the “Hick’s paper”. This method requires a H2S continuous monitor, but not a true SO2 CEMS.
0067-M3	9/15/1995	NSR Modification	Installs catalytic converters on two existing Waukesha engines and installs five new Waukesha engines equipped with catalytic converters. This change lowers NOx emissions by 92.8 tpy; CO emissions by 23 tpy; and VOC emissions by 8.3 tpy.
0067-M2	12/6/1992	NSR Modification	Install one hot oil heater and one 11 tpy SRU. This increases NOx by 4.5 tpy and SO2 by 632.8 tpy.
0067-M1	12/17/1982	NSR Modification	This modification adds two Clark 1200 hp engines and one Cooper Bessemer engine. Net effect on emissions: NOx will increase by nnn tpy; CO will increase by nnn tpy; and VOCs will increase by nnn tpy.
0067	5/23/1975	NSR	Authorized the replacement of the oil absorption unit with a cryogenic unit. No information is available on the net effects of the emission limits.

6.0 Public Response/Concerns: As of XXXX XX, 2020, or the issuance date of this permit, this permit writer is not aware of any public comment or concern.

7.0 Compliance Testing:

Unit No.	Test Description	Test Date
C-1 thru 13, C-15	Tested in accordance with EPA test methods for NOx and CO as required in NSR Permit 0067-M7.	C13, C15 – Down NN C1, C2, C3, – 11/26/19 C4, C5, C6, C7 – 11/27/19
C-13A	Tested in accordance with EPA test methods for NOx and CO as required in NSR Permit 0067-M7.	12/5/18 3/25/19 6/10/19 9/26/19

		12/27/19
C-17	Tested in accordance with EPA test methods for NOx and CO as required in NSR Permit 0067-M7.	12/4/18 3/28/19 6/10/19 9/26/19 12/27/19
C-18	Tested in accordance with EPA test methods for NOx and CO as required in NSR Permit 0067-M7.	12/3/18 3/25/19 6/10/19 9/26/19 12/27/19
C-19	Tested in accordance with EPA test methods for NOx and CO as required in NSR Permit 0067-M7.	12/4/18 3/25/19 6/10/19 9/26/19 12/27/19
C-20	Tested in accordance with EPA test methods for NOx and CO as required in NSR Permit 0067-M7.	12/5/18 3/28/19 06/19 – down NN 9/26/19 12/27/19
C-21	Tested in accordance with EPA test methods for NOx and CO as required in NSR Permit 0067-M7.	12/13/18 3/25/19 6/11/19 9/26/19
C-22	Tested in accordance with EPA test methods for NOx and CO as required in NSR Permit 0067-M7.	12/13/18 3/25/19 6/11/19 09/19 – down NN 12/27/19

8.0 Startup and Shutdown:

- A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? **Yes**
- B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? **Yes**
- C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? **Yes**
- D. Does the facility have emissions due to routine or predictable startup, shutdown, and maintenance? If so, have all emissions from startup, shutdown, and scheduled maintenance operations been permitted? **Yes**

9.0 Compliance and Enforcement Status [Title V and NSR/PSD new or modification].

Per Cember Hardison, “There is one outstanding notice of violation (NOV) for Targa’s Eunice Gas Processing Plant, case number TAR-0609-1802... As part of the TAR-0610-1701 Settlement/SEP for past excess emissions violations also caused by flaring, Targa is required to install a redundant AGI compressor.” These are active actions as of September xx, 2020 or issuance of this permit.

10.0 Modeling:

The proposed modification will increase VOC and H₂S emissions. A modeling waiver for H₂S was requested and granted via email May 12, 2020 by Sufi Mustafa, AQB Modeling Manager.

No modeling request or waiver is required for VOCs.

11.0 State Regulatory Analysis(NMAC/AQCR):

STATE REGULATIONS CITATION 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	JUSTIFICATION:
2.1	GENERAL PROVISIONS	Yes, Always	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code, so it is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	Yes, for NSR	Entire Facility	NSR: 20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide, and Nitrogen Dioxide.
2.7	Excess Emissions	Yes, Always	Entire Facility	Applies to all facilities' sources
2.33	Gas Burning Equipment – Nitrogen Dioxide	No	B-01, B-02, RH-W, RH-E, H-01, H-02	This facility has existing gas burning equipment: two boilers (B-01, B-02) and four heaters (RH-W, RH-E, H-01, H-02). B-01 and B-02 each have a heat input of 876,000 million BTU/year; RH-W: 87,600 million BTU/year; RH-E: 30,660 million BTU/year; H-01: 10,950 million BTU/year; and H-02: 2,700 million BTU/year. None of these units have a heat input of greater than 1,000,000 million BTU per year per unit; therefore, this regulation does not apply.
2.34	Oil Burning Equipment – Nitrogen Dioxide	No	Entire facility	This facility does not have oil burning equipment (heaters or boilers).
2.35	Natural Gas Processing Plant – Sulfur	No	Entire Facility	This regulation could apply to existing (prior to July 1, 1974) or new (on or after July 1, 1974) natural gas processing plants that use a Sulfur Recovery Unit to reduce sulfur emissions. This facility no longer has a Sulfur Recovery Unit (removed in NSR 0067-M6R3). AQB determination by Robert Samaniego (March 4, 2016) stated that facilities with an acid gas injection well for acid gas control are not subject to this regulation.
2.38	Hydrocarbon Storage Facilities	Yes	TK-1, TK-2	This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities. TK-1 & TK-2 meet the criteria in 20.2.38.109: more than 20,000 gallons capacity and more than 30,000 gallons per week throughput. TK-3 does not meet the throughput threshold at 35,000 gallons/year.
2.39	Sulfur Recovery Plant - Sulfur	No	Entire facility	This regulation could apply to sulfur recovery plants that are not part of petroleum or natural gas processing facilities. Eunice Gas Processing Plant does not have a sulfur recovery plant, so this regulation is not applicable.

STATE REGULATIONS CITATION 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	JUSTIFICATION:
2.61	Smoke and Visible Emissions	Yes	C-01 to C-13, C-13A, C-17 to C-22, EG-01, EG-02, B-01, B-02, H-01, H-02, RH-W, RH-E, F-01, F-02	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares. The emissions units listed are all stationary combustion equipment: engines & generators (C-01 to C-13, C-13A, C-17 to C-22, EG-01, EG-02); boilers (B-01 & B-02); heaters (RH-W, RH-E, H-01, H-02); and flares (F-01 & F-02).
2.70	Operating Permits	Yes	Entire Facility	The source is a Title V Major Source as defined at 20.2.70.7 NMAC. The facility is major for NOx, CO, VOC, and SOx.
2.71	Operating Permit Fees	Yes	Entire Facility	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC. Therefore, operating permit fees are applicable.
2.72	Construction Permits	Yes	Entire Facility	The proposed modification is subject per 20.2.72.200.A(2). The PER is > 10 pph and 25 tpy for CO, NOx, and SOx criteria pollutants.
2.73	NOI & Emissions Inventory Requirements	Yes, Always	Entire Facility	Applicable to all facilities that require a permit. PER > 10 tpy for a regulated air contaminant.
2.74	Permits-Prevention of Significant Deterioration	Yes	Entire Facility	This facility is subject to this regulation per 20.2.74.7.AG(2) NMAC: A stationary source not listed in Table 1 of this Part (20.2.74.501 NMAC) and which emits or has the potential to emit stack emissions of two hundred fifty (250) tons per year or more of any regulated pollutant. CO, NOx, and SOx all exceeds the threshold of 250 tpy.
2.75	Construction Permit Fees	Yes	Entire Facility	This facility is subject to 20.2.72 NMAC; but in accordance with 20.2.75.11.E, an annual NSR enforcement and compliance fee shall not apply to sources subject to 20.2.71 NMAC.
2.77	New Source Performance	Yes	See sources subject to 40 CFR 60	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60
2.78	Emissions Standards for HAPs	No	Entire facility	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61. Subpart M would apply in the eventuality of asbestos demolition.
2.79	Permits-Nonattainment Areas	No	Entire facility	This facility is not located in, nor does it affect, a nonattainment area, yet.
2.82	MACT Standards for Source Categories of HAPs	Yes	See sources subject to 40 CFR 63	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63

12.0 Federal Regulatory Analysis:

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Air Programs Subchapter C	National Primary and Secondary Ambient Air Quality Standards	Yes	Entire Facility	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard. There are NAAQSs for NOx, CO, SO ₂ , H ₂ S, PM ₁₀ & PM _{2.5} .

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
(40 CFR 50)				
NSPS Subpart A (40 CFR 60)	General Provisions		See Subpart in 40 CFR 60	Applies if any other subpart applies.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	B-01, B-02, RH-W, RH-E, H-01, H-02	Units B-01, B-02 and RH-W are not subject to this regulation because these units were constructed before the applicability date of June 9, 1989 in 60.40c(a). Units RH-E, H-01, and H-02 are not subject to this regulation because these units do not meet the maximum design heat capacity of 10MMBtu/h in 60.40c(a).
40 CFR 60, Subpart Kb	Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	No	TK-1, TK-2	The facility has storage vessels TK-1 and TK-2, each with storage capacity of 79.5 m ³ , which is greater than 75m ³ that are used to store volatile organic liquids and construction, reconstruction, or modification did commence after a applicability date of July 23, 1984. However, per 60.110b(d)(4), TK-1 and TK-2 are exempt: “(4) Vessels with a design capacity less than or equal to 1,589.874 m ³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.”
40 CFR 60, Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	Yes	Affected units in 60.630 except EC-1, EC-2, EC-3, L-02, FG-01 (see Subpart OOOOa)	Per 60.630(a), (b) & (e), this facility and units located at the onshore natural gas processing plant is an affected facility: (a)(3) The group of all equipment except compressors (defined in §60.631) within a process unit is an affected facility. (b) Any affected facility under paragraph (a) of this section that commences construction, reconstruction, or modification after January 20, 1984, and on or before August 23, 2011, is subject to the requirements of this subpart. (e) A compressor station, dehydration unit, sweetening unit, underground storage tank, field gas gathering system, or liquefied natural gas unit is covered by this subpart if it is located at an onshore natural gas processing plant. If the unit is not located at the plant site, then it is exempt from the provisions of this subpart. From the SOB's of NSR 0067-M9R2 and TV P109-R3: “The applicability dates for this subpart don’t apply because a settlement agreement between Targa and NMED [AQCA 09-00(CO)] mandated Subpart KKK monitoring for all units. However, NSPS OOOO applies to VOC leaks for similar (e.g., KKK) facilities after August 23, 2011.”
40 CFR Part 60 Subpart IIII (Quad-I)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Yes	EG-01 (but NSR exempt)	Unit EG-01 is subject to this regulation as per 60.4200(a)(2)(i). EG-01 (emergency generator, 1341 hp), per 60.4205(b), emissions standards to follow are under 60.4202(a)(2). However, it is a NSR-exempt emergency engine. For 125 hp EG-02, as per 60.4204(b), emissions standards to follow for new (2007 model year and later), non-emergency, < 30 L displacement per cylinder, are under 60.4201 (a). The applicant used certification emissions standards in Table 1 of 40CFR 89.112. However, as a non-road engine, Subpart IIII is not applicable per 60.4200(e).

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark-Ignition Internal Combustion Engines	No	C-01 to C-13, C-13A, C-17 to C-22	According to the SOB for NSR 0067-M9R2, the exact installation dates are not known. The stationary SI ICE engines were in place between 1984 and 2011. On that assumption, all the stationary SI ICE engines at this facility commenced construction before the applicability date of June 12, 2006 as stated in 60.4230(a)(6).
NSPS 40 CFR Part 60 Subpart OOOO (Quad -O)	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	Yes	Compressors for EC-01 and EC-02, fugitives for L-02	The compressors associated with C-01 to C-13, C-13A, C-17 to C-22 are before the applicability date of August 23, 2011. The compressors associated with EC-01 and EC-02 were constructed between August 23, 2011 and September 18, 2015 and are considered affected facilities as per 60.5365(c). Fugitives associated with L-02, constructed April 15, 2015, are subject to this regulation as per 60.5365(f)(2). In accordance with the SOBs for NSR 0067-M9R2 & TV P109-R3: "If a unit at this facility is not subject to 40 CFR 60 Subpart OOOO or OOOOa, it is subject to 40 CFR 60, Subpart KKK per AQCA 09-00(CO). If any part of 40 CFR 60 Subpart OOOO or OOOOa is stayed, the equipment must meet the relevant parts of 40 CFR 60 Subpart KKK."
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	Yes	EC-3, FG-01, FG-01-RSC, AGI-C2	Reciprocating compressor (EC-3) was permitted on April 4, 2018, so is subject per 60.5365a(c). Rotary screw compressors, permitted on March 28, 2019, are not subject as per the definition of 'Centrifugal compressor' under 60.5430a. The associated fugitives in propane service (FG-01-RSC) and facility fugitives (FG-01) are at 60.5410a. Redundant acid gas compressor (AGI-C2) to be installed is subject as a new compressor. In accordance with the SOBs for NSR 0067-M9R2 & TV P109-R3: "If a unit at this facility is not subject to 40 CFR 60 Subpart OOOO or OOOOa, it is subject to 40 CFR 60, Subpart KKK per AQCA 09-00(CO). If any part of 40 CFR 60 Subpart OOOO or OOOOa is stayed, the equipment must meet the relevant parts of 40 CFR 60 Subpart KKK." The emissions represented by L-01 and L-02 are considered affected facilities per 60.5365a(f). However, per 60.5365a(f)(1), "Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart." Therefore, emission increases at L-01 and L-02 do not constitute applicability.
NESHAP Subpart A (40 CFR 61)	General Provisions	Yes	See Subpart in 40 CFR 61	Applies if any other subpart applies.
NESHAP 40 CFR 61 Subpart M	National Emission Standards for Asbestos	Potentially	Facility	Although this standard does not apply to this facility under routine operating conditions, in the case of a asbestos demolition, Subpart M would apply.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	Yes	G-01	AREA SOURCE (Minor for HAPs): The facility contains affected sources (TEG glycol dehydrators, 63.760(b)(2)). However, as actual benzene emissions are less than one ton per year (63.764(e)(ii)) at 0.4 tpy, Unit G-01 is exempt. The records of the determination must be maintained as required

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				in 63.774(d)(1).
40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities	No	Facility	This subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas <u>prior</u> to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271. This facility does not meet the definition of a natural gas transmission and storage facility as defined in 63.1271.
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	C-01 to C-13, C-13A, C-17 to C-22 (EG-01, but NSR exempt)	A facility is subject to this subpart if they own or operate a stationary RICE at a major OR area source of HAP emissions. This facility is a major source of HAPs with 62 tpy, according to the definition for major source at 63.6675. Engines C-01 to C-13, C-13A, C-17 to C-22 are all affected sources at 63.6590(a)(1)(i). All units are > 500 hp and C-01 to C-13, C-13A, C-17 to C-22 were constructed before the applicability date of December 12, 2002, so are considered existing. Generators EG-01 and EG-02 were constructed in 2015; therefore, they are considered new per 63.6590(a)(2)(i) & (ii). Per 63.6590(b)(3)(i) for C-01 to C-13, the requirements of Subpart ZZZZ and Subpart A do not have to be met by these units, including initial notification. Per 63.6600(a), C-13A and C-17 to C-22 are subject to emission limitations in Table 1a and operating limitations in Table 1b. EG-01 is an emergency, CI, stationary RICE, > 500 hp at a major source and will comply according to operating limits set in Table 2b as per 63.6600(b). Per 63.6600(c), emissions limitations in Table 2a are not required for emergency stationary RICE. EG-02 is exempt as a nonroad engine as indicated in 63.6585(a).
40 CFR 63 Subpart DDDDD (5-Ds)	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Yes	B-01, B-02, RH-W, RH-E, H-01, H-02	Facility is subject to this subpart if it owns or operates an industrial, commercial, or institutional boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAP as defined in 63.2 or 63.761 (40 CFR part 63, Subpart HH), except as specified in 63.7491. Eunice Gas Processing Plant is a major source of HAPs. All units (B-01, B-02, RH-W, RH-E, H-01, H-02) are existing affected sources as per 63.7490(a)(1), constructed before the applicability date of June 4, 2010 in 63.7490(b), and are boilers and heaters per 63.7499(l). For the boilers (B-01 & B-02) and RH-W: <ul style="list-style-type: none"> - There are no numeric emissions limits per Table 2. - Per 63.7510(e), complete initial tune-ups and one-time energy assessment by 1/31/2016. - Per 63.7545(b), submit initial notification no later than 120 days after 1/31/2013. - Per 63.7550(b), compliance certification 1st report submitted by January 31, 2017. Annual or 5-year compliance reports submitted by January 31. For heaters RH-E, H-01, H-02, all with heat input capacity <= 5MMBtu/hr: <ul style="list-style-type: none"> - Per 63.7500(e), complete tune-up every 5 years according to

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				63.7540.
40 CFR 63 Subpart JJJJJ (6-Js)	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources	No	B-01, B-02	Units B-01 and B-02 are not subject to MACT 6-J per 63.11195(e) since these units are gas-fired boilers and boilers are not at an area source as defined in 63.2.
40 CFR 64	Compliance Assurance Monitoring	Yes	AM-01, AGI, F-01, C-13A, C-17 to C-22.	In accordance with the SOBs for TV P109-R3 and NSR 0067-M9R2: "The dehydrator (Unit G-01) at Eunice Gas Processing Plant has pre-control VOC emissions greater than 100 tpy VOC, is subject to a VOC emission limitation in NSR Permit 67-M6R2 and uses a control device (the VRU) to achieve compliance with this limit. However, the dehydrator is subject to MACT Subpart HH (proposed by EPA on 2/6/98), so it is exempt from CAM requirements pursuant to 40 CFR 64.2(b)(1)(i). The amine unit (AM-01) at the facility is not directly subject to any permit emission limitations or standards. It is controlled by both the acid gas injection well (AGI), and the acid gas flare (F-01). The AGI and the acid gas flare are subject to CAM." Engine units C-13A, C-17 to C-22 meet the applicable requirements in 64.2(a): (1) There are emissions limits under TV P109-R3; (2) The engine units each have a NSCR catalyst and AFR controller; and (3) each engine unit have pre-control device emissions > 100 tpy for NOx and CO.
40 CFR 68	Chemical Accident Prevention	Yes	Entire facility	An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under § 68.115 Threshold determination and 68.130 List of substances. The facility has more than a threshold quantity of a regulated substance in a process, as determined under § 68.115 Threshold determination and 68.130. According to the applicant, "The facility maintains a current RMP."
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	Yes	Entire facility	According to the applicant, "Targa owns appliances containing CFCs and is therefore technically subject to this requirement. Targa uses only certified technicians for the maintenance, service, repair, and disposal of appliances and maintains the appropriate records for this requirement."

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

Title V - INSIGNIFICANT ACTIVITIES and/or NSR Exempt (Table 2-B)

Unit Number	Source Description	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²
		Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List	Date of Installation /Construction ²

				Item #1.a)	
AGI-C1	Electric Compressor at AGI Well	TBD	TBD	Not a source of regulated pollutants	2010
		Y6R-3815C	TBD	-	~2010
TK-3	Gunbarrel (Fixed Roof Storage Tank)	N/A	500	Not a source of regulated pollutants	09/01/2007
		N/A	bbl	-	TBD
Haul	Haul Road	N/A	N/A	20.2.72.202.B.5 NMAC	N/A
		N/A	N/A	IA List Item #1.a	N/A
ME10	Diesel Storage Tank	N/A	1,000	20.2.72.202.B.5 NMAC	2010
		N/A	gal	IA List Item #1.a	~2010
ME11	Methanol Storage Tank	N/A	2,000	20.2.72.202.B.5 NMAC	TBD
		N/A	gal	IA List Item #1.a	TBD
ME12	Used Engine Oil	N/A	42,000	20.2.72.202.B.2	TBD
		N/A	gal	IA List Item #5	TBD
ME13	Norkool Tank (Coolant)	N/A	500	20.2.72.202.B.2	TBD
		N/A	gal	IA List Item #5	TBD
EG-01	Diesel Emergency Generator	Unknown	1341 hp	20.2.72.202.B.3	2015
		JAZ 03085	1341 hp	-	2015
AGI-C2 SSM	SSM for Redundant Electric Compressor at AGI Well	TBD	TBD	20.2.72.202.B.5 NMAC	2020

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

- A. Revised Condition A107.I SSM Emissions from VRU Downtime (SSM-VRU) modified to remove citation of NSR permit 0067-M9R1.
- B. Removed Condition A107.K for SSM-G-01 per email request dated 13 July 2020. SSM-G-01 also removed from Table 107.A.
- C. Removed Condition A107.L SSM for AGI-C2 blowdowns and SSM-AGI-C2 emissions unit from Table 107.A. This emission unit, permitted in PSD minor modification 0067-M10, is below NSR threshold limits and considered NSR exempt
- D. Revised Condition A108.B to include hours of operation for EG-01 (diesel emergency generator).
- E. Addition of Condition A110.C. for fuel sulfur content of supplemental and pilot fuel for F-01 and F-02.
- F. Revised Condition A203.C. Truck Loading Throughput: updated per Tanks & Loading monitoring protocol (version September 19, 2017).
- G. Addition of Condition A203.D. Tank Vapor Recovery Unit Control Device Inspection: Tanks & Loading monitoring protocol (version September 19, 2017) to reflect VRU-3 controlling emissions from TK-1 and TK-2.
- H. Revised Conditions A210A and A210B from PSD minor modification 0067-M10 incorporated.
- I. Updated General Conditions B (version June 18, 2019).

15.0 For Title V action: Cross Reference Table between NSR Permit 0067-M11 and TV Permit P109-R3. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:

Not applicable for this NSR permit action.

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

- A. ME-12 and Haul roads were verified to maintain NSR exempt status: 20.2.72.202.B(2) and B(5), respectively.
- B. SSM VRU downtime (VRU-3 for TK-1, TK-2, L-01, L-02) changed from 5% to 3.75%.
- C. Truck loading L-01 and L-02 have collection efficiency of 70%. The uncollected proportion (30%) is represented at these units. During VRU-3 downtime (3.75%), TK-1 and TK-2 are not vapor balanced during condensate loadout at L-01 and L-02, so the 70% collected vapors from L-01 and L-02 are represent within SSM VRU.
- D. Table 105 was modified to separate the 2 VRUs for Unit G-01 and the VRU (Unit VRU-3) for Units TK-1, TK-2, L-01, and L-02. Correspondingly, Units VRU-1 and VRU-2 are identified in Condition A202.A (Glycol Dehydrator Control Device Inspection) and VRU-3 in Condition A107.A (SSM from VRU downtime) and new Condition A203.D Tank VRU Control Device Inspection.
- E. Table 107.A. was reorganized to more clearly indicate that the total malfunction emissions (tpy) encompass combustion flaring from F-01 and F-02 and venting.
- F. According to the applicant (email dated July 2, 2020), GHG emissions vary among units with the same parameters due to fuel usage adjustment to each combustion unit.
- G. For the next permit action involving engine modifications, the permit writer should review the fuel sulfur content to ensure that A110.A. Fuel and Fuel Sulfur Requirements are accurate.
- H. Emissions for EG-01, as presented in Table 2-D and Table 2-E and representing 8760 hours of operation for tpy, would not be considered a NSR-exempt equipment (emergency generator). EG-01 is included in PSD Minor Modification 0067-M11 to correspond with TV permits as requested by applicant (email dated June 4, 2020 for PSD Minor Modification 0067-M10). Facility PTE does not include EG-01 emissions, so these emissions should not be in Tables 2-D or 2-E. EG-01 is subject to 40 CFR 60 Subpart IIII and there are emissions limitations as per 40 CFR 60.4202(a)(2); however, AQB does not have delegated authority for 40 CFR 89. EG-01 is also subject to 40 CFR 63 Subpart ZZZZ, emissions limitations per Table 2a. However, per 63.6600(c), these are not requirements. Emissions for EG-01 were provided for future PSD determination as indicated in the Database summary for TV P109-R3 and originally reviewed under PSD minor modification 0067-M7.
- I. Unit EG-01 was added to Conditions A110.C (Fuel and Fuel Sulfur Requirements); A111.B (20.2.61 NMAC Opacity Requirements);
- J. EG-02 (backup diesel air compressor), a non-road engine, had allowable limits set for the equipment (in PSD minor mod 0067-M7) in correspondence with Condition A108.B. Limits on Hours of Operation.