

FAQs for Streamline Permits

1/4/05

What is a Streamline permit?

Reciprocating internal combustion engines and turbines that are subject to Construction Permit requirements under 20.2.72 NMAC (Part 72) may have the option of being permitted under Streamline permit provisions. The streamline provisions allow the source to be issued a permit more quickly than typically occurs under the usual permitting process. Specific regulatory requirements for Streamline permits may be found at 20.2.72.300-399 NMAC.

What are my permitting options if a Streamline permit does not work for my facility?

If you need a permit and, for some reason, a Streamline permit does not work for your facility, you have three permitting options:

- **Regular Permit:** Use the Universal application found on our Air Quality Bureau (AQB) web site: http://www.env.nm.gov/aqb/permit/app_form.html . We suggest using this permitting process for facilities that do not meet the requirements of a GCP-1, GCP-4, or a Streamline permit. It should also be used in situations where more flexibility is required than these permits offer.
- **GCP-1:** In many respects, the GCP-1 permit has more restrictions than the Streamline permit, but can be obtained in 30 days of receipt of the application by the AQB. Note that the facility must meet **all** the restriction requirements of a GCP-1 in order to qualify.
- **GCP-4:** In many respects the GCP-4 permit provides greater flexibility than both the GCP-1 permit and the Streamline permit and can be obtained in 30 days of receipt of the application by the AQB. Note that the facility must meet **all** the restriction requirements of a GCP-4 in order to qualify.

What are the emissions allowed under Streamline provisions?

For each regulated contaminant, the total potential to emit from all emissions units at the facility must be less than 40 tons per year (TPY) for Level 1 Streamline permits [301.D.1] or 100 TPY for Level 2 Streamline permits [301.D.2]. The 'potential to emit' is the maximum level of emissions that will be emitted after taking into account the emissions controls and the other limitations proposed in the permit application [300.E]. Level 3 Streamline permits [301.D.3] are available to sources that will not exceed specific ambient impact limitations. These FAQs deal with Level 1 Streamline permits only. Contact the NSR Section manager or your permit specialist for questions regarding Level 2 & 3 Streamline permits.

What are the 'regulated contaminants' to which the TPY thresholds apply?

'Regulated contaminants' typically emitted at compressor stations include: oxides of nitrogen (NOX (expressed as NO₂) and NO₃), sulfur dioxide (SO₂), hydrogen sulfide (H₂S), carbon monoxide (CO), volatile organic carbons (VOC) and particulate matter (TSP, PM₁₀ and PM_{2.5}).

What are the restrictions to 'ancillary' equipment (equipment other than IC engines and turbines) at the facility?

Part 72 states that a "compressor station may have auxiliary equipment which emits small quantities [italics added] of regulated air contaminants" [300.A] and lists as examples "separators, de-hydration units heaters, treaters and storage tanks" located at the facility. For purposes of Streamline permits, the Bureau defines the term 'small quantities' as follows:

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sum of emissions prior to controls from all equipment at the facility other than IC engines and turbines shall be less than 10 pounds per hour or 25 TPY for each regulated contaminant other than VOC, and less than 40 TPY for VOC. A further discussion of the basis for this determination may be found in the What ancillary equipment is allowed under a Streamline permit? FAQ in this document. Note that the sum of all equipment includes equipment that would otherwise be exempted in a non-streamline permit; the introductory language to the exemption language in Section 202 of Part 72 excludes streamline permits from such exemptions. Ancillary equipment and their associated emissions should be listed on the permit application.

What are the fees for a Streamline permit?

Under 20.2.75 NMAC – Construction Permit Fees, the fee for a Streamline permit is currently \$3150.00 (10 points at \$315.00 per point). For portable source Streamline permits, this fee applies to each engine, or turbine, or compressor package/equipment set (consisting of an engine or turbine with permitted, associated equipment) included in the portable source permit. Submit the fee at the time of application. Annual fees of \$1,500 per permit also apply.

How can Streamline permits be revised, once issued?

Part 72 (Section 301.D(4)) allows streamline sources to make modifications to auxiliary equipment that emit 1.0 lb/hr or less without revising the streamline permit, however the Department must be notified of such change no later than 15 days prior to the expected change. Other equipment changes, including adding additional identical unit (s) to an existing portable permit, require a new permit and are subject to permit fees. The new permit generally has a permit number similar to the old one; for example, the Bureau may just add “M1” to the old number. The permit revision provisions in Section 219 of Part 2.72 do not apply to Streamline permits. The Department, at its discretion, may elect to reopen a Streamline permit to make administrative changes similar to those allowed under Section 219.A of Part 2.72. An owner may request the permit be reopened to make these administrative changes.

May additional engines or turbines be added onto an existing portable streamline permit that does not meet the requirements of this FAQ?

No. Any new streamline permit and any revision to an existing streamline permit must meet the provisions of this FAQ. For example, the potential emissions and the auxiliary equipment in the permit must conform to the limitations referred to above.

Who is the responsible party when equipment permitted by the rental company is located on site?

Both the rental company that holds the permit and the owner/operator of the site may be subject to enforcement action if permits or regulations are violated. The rental company that holds the permit for the equipment located at a site is responsible as the permittee. The owner//operator of the site is also responsible, as operator of the equipment, that all regulatory requirements and all permit requirements are met at the site.

Are multiple equipment sets with the same permit number multiple permits?

Yes, for all considerations except annual permit fees, each equipment set is considered a single permit. For instance, if one or more of the equipment sets are sold, they will need to obtain their own permit under the new owner’s name. The permit cannot be split between two owners. Each equipment set is required to pay construction permit fees (\$500 filing fee and \$2,650 permit fee) when it is added to the permit. There is a single annual fee assessed to the permit number, which

covers all the equipment sets included in the permit document. Note that each equipment set must be operated in a different location than the other sets.

What are the site requirements for relocation of portable compressors?

A portable unit may not be located at the same site as any other source of air emissions, unless the language in the permit specifically allows for co-location, or the facility obtains a new construction permit under 20 NMAC 2.72, or the sum of emissions of the other sources is no more than 1 pound per hour for each contaminant. If the applicant wishes to relocate, they may obtain a portable permit concurrently with a permit under 20 NMAC 2.72 (Section 200 or 301) for a fixed site. If a unit already has a portable permit, it may retain that permit while also being permitted and located with other units at a permitted fixed site under a new 20 NMAC 2.72 stationary permit.

What are the relocation procedures for relocation of portable compressors?

A company that has a permit for a portable compressor unit may move it anytime after they have completed the relocation notice form and have determined that they comply with restrictions listed in the relocation form; the company does not have to submit the relocation notice to the Environment Department, but must put it in their own files and provide it to the Department upon request. See the NMED website (www.env.nm.gov) for the relocation form. The completed relocation form shall be retained for two years after the unit moves from the location to which the form applies. In situations where the holder of a permit rents the permitted equipment to another party, the permittee shall keep a copy of the permit and relocation notice for two years after the relocation. In case the permittee is not the owner/operator, the owner/operator should keep a copy for the same period of time.

What are the requirements for listing multiple equipment sets under a single Streamline permit?

A company may submit an application that has multiple portable compressor units (or multiple identical compressor 'equipment sets'). Each set must meet the description of the equipment set described in the application and the engines must be the same model and horsepower and made by the same manufacturer. The AQB will list all of the units in the streamline permit (w/ serial numbers). Each additional portable streamline compressor permit application must be submitted with a \$500 application fee and will be assessed a \$2650 permit fee (per 20 NMAC 2.75). For example, a streamline portable with 5 identical units would require a filing fee of \$2,500 and a permit fee of \$13,250. If your company has multiple equipment sets under the same permit, all equipment sets at all locations must independently meet the requirements of the streamline permit. When adding units to an existing portable streamline permit that meets the provisions of this FAQ, the applicant only needs to submit a letter identifying the existing portable permit number and number of units currently permitted, the number of new units they are adding to the permit and the appropriate application and permit fees. A detailed permit application is not necessary.

How should I provide the serial number information for the engines package(s) covered under a portable Streamline permit?

When submitting the Streamline application or adding an engine package(s) to an existing portable Streamline permit, please provide the serial number information for each engine covered by the permit in an Excel spreadsheet (both electronically and in print), formatted as shown below unless the total number of packages is five or less. If this is the case, provide this information on the Streamline application form.

Item #Unit NoEngine Make and Model Engine Serial NumberH/PPermit that added
Engines 130008Caterpillar G3306NA7Y5951451538R21260099Caterpillar
G3306NAHCC50000431451538R21360125Caterpillar
G3306NA07Y005951451538R21470028Caterpillar
G3306NAHCC55002361451538R21570099Caterpillar G3306NA07Y030181451538R21

These guidelines have changed somewhat. If I have a streamline permit that meets the previous guidelines, can I add (or replace) new equipment sets to the old permit that do not meet these current guidelines?

No, any changes made to any Streamline permit must meet the most current set of guidelines.
If I have multiple equipment sets under a single Streamline permit, how will the annual enforcement/compliance fees be assessed?

As per 20 NMAC 2.75, the Department will assess an annual enforcement/compliance fee, as specified in Section 110. 20 NMAC 2.75 set the annual fee amount at \$1,500 per permit (not per unit in a portable streamline permit) through 2004 and requires it to be adjusted annually for the Consumer Price Index on January 1 of each year. The current fee amount is available by contacting the Department or can be found on the Department's website. The AQB will invoice the permittee for the annual fee amount at the beginning of each calendar year.

What happens when we sell an equipment set(s) from a portable Streamline permit?

Multiple portable units in a permit remain permitted for as long as the units are owned by a single permittee. When a unit is sold it is removed from the permit, but the permit remains in effect for the remaining units. The permittee must notify the Department of units that are sold or removed from a portable permit. The portable streamline permit may be transferred to a new owner, however the ownership transfer must include all the compressor engines listed and cannot be split between different owners. The seller of a permit must notify the Department of the change in ownership. The buyer of a permit may notify the Department of the change in ownership providing that the notice is accompanied with proper documentation of the transfer of ownership.

What ancillary equipment is allowed under a Streamline permit?

An engine or turbine may be located with ancillary equipment, and that ancillary equipment may have total emissions equal to or less than 10 pounds per hour or 25 tons per year of each regulated contaminant, except volatile organic compound emissions could be up to 40 tons per year. Yet the sum of all emissions from the facility, including ancillary equipment, may not exceed 40 tons per year of any one contaminant. Modifications may be made to ancillary equipment without obtaining a permit change only if the regulated contaminants that are affected are emitted before and after the change at 1 pound per hour or less.

The limitations to auxiliary equipment are based on interpretation of the term 'small quantities' in 20.2.72.300.A. Part 72 states that a "compressor station may have auxiliary equipment which emits small quantities [italics added] of regulated air contaminants" [300.A] and lists as examples "separators, de-hydration units heaters, treaters and storage tanks" located at the

facility. Although the term ‘small quantities’ is not specifically quantified in Part 72, the regulation later states [301.D(4)] that modifications may be made to auxiliary equipment without a permit revision “as long as the total potential to emit of all auxiliary equipment remains [italics added] at or below 1.0 lb/hr for any one regulated air contaminant”. However, Part 72 also states [301.B(4)] that a streamline compressor station may not be located “at any facility containing sources in addition to IC engines and/or turbines for which an air quality permit is required”. While the latter statement could be interpreted by its context to apply only to co-located facilities not necessarily integral to the compressor station, the Bureau has historically interpreted Part 72 to limit the sum of all auxiliary equipment at Streamline facilities to that which would not emit greater than 10 pounds per hour or 25 TPY, calculated prior to controls for each pollutant for which an air quality ambient standard exists. Such pollutants include oxides of nitrogen (NO (expressed as NO₂) and NO₂), sulfur dioxide (SO₂), hydrogen sulfide (H₂S), carbon monoxide (CO) and particulate matter (TSP, PM₁₀ and PM_{2.5}). This interpretation of ‘small quantities’ for Streamline permit auxiliary equipment remains. In addition, a ‘small quantity’ of VOC is determined to be 40 TPY, which is the maximum VOC allowable at a Level 1 facility. By using the broader definition, the Bureau allows more sources to use Streamline permitting and also assures that more complex permits, such as those that trigger the MACT, will be unlikely to use this permit process. The review time granted for processing Streamline permits is not sufficient to adequately evaluate complex permit applications.

What are the H₂S Emissions Limits for a Streamline Permit?

H₂S emissions after taking into account the emissions controls and the other limitations proposed in the permit application [300.E] must be less than 0.5 TPY. If H₂S emissions exceed this