

Statement of Basis - Narrative
NSR Permit

Type of Permit Action: Regular-Significant Revision

Facility: Linam Ranch Gas Plant

Company: DCP Midstream, L.P.

Permit No(s): 0039M7 and P094R1M1

Tempo/IDEA ID No.: 589 - PRN20130003

Permit Writer: Melinda Owens

Fee Tracking

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Paid Invoice Attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Balance Due Invoice Attached: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Invoice Comments: Filing fee of \$500 paid 12/16/13. Balance due of \$7,280.00

Permit Review	Date to Enforcement: TBD	Inspector Reviewing: Robert Samaniego
	Date Enf. Review Completed:	Date of Reply: (if necessary)
	Date to Applicant: TBD	Date of Reply:
	Date of Comments from EPA: N/A	Date to EPA: N/A
	Date to Supervisor: TBD	

1.0 Plant Process Description:

Linam Ranch Plant is a natural gas processing plant permitted to process up to 225 MM standard cubic feet of natural gas per day. The natural gas processed at Linam Ranch is mostly methane, but contains other hydrocarbons heavier than methane that can be condensed into liquids in the plant. The gas also contains impurities including water, hydrogen sulfide, and carbon dioxide.

The plant consists of an Inlet Receiving System, Amine Treater, Acid Gas Injection well, Sulfur Recovery Unit, Inlet Compression and Dehydration System, Cryogenic/Turbo Expander Plant with external Propane Refrigeration, Residue Compression, and Product Sales for Residue Gas, NGL Liquids, Stabilized Oil, Slop Oil, and Molten Liquid Sulfur. Additionally, the Fuel Gas Systems, Instrument and Starting Air Systems, Steam Systems, Cooling Towers, ESD Flare, Acid Gas Flare, Acid Gas Injection Flare and Drain Systems are supporting units that aid the processes.

2.0 Description of this Modification:

As requested by the Department, DCP Midstream Services, LP is submitting this NSR Significant Modification, pursuant to 20.2.72.219 (D) NMAC, to quantify the facility's routine or predictable emission during startup, shutdown, and scheduled maintenance. Malfunction emissions are also quantified.

In addition to SSM and Malfunction emissions, DCP is also updating the steady state emissions for the following units:

- 2, Amine Plant Flare East
- 4A, ESD Flare
- AGI Flare
- FUG, facility-wide fugitives

3.0 Source Determination:

1. The emission sources evaluated include Linam Ranch Gas Plant.

2. Single Source Analysis:

- A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? Yes
- B. Common Ownership or Control: Are the facilities under common ownership or control? Yes
- C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes

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

4.0 PSD Applicability:

- A. The source, as determined in 3.0 above, is an existing PSD Major Source that has never had a major modification requiring a BACT analysis.
- B. The project emissions for this modification are not significant.
- C. Netting is not required (project is not significant).
- D. BACT is not required for this modification (minor Mod).

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)
P094R2	TBD	TV Renewal	Current in-house TV renewal application (ruled complete on 10/17/2013) will incorporate all NSR permits, if feasible.
0039M7*	TBD	NSR Sig Mod	This revision consist of: <ul style="list-style-type: none"> • Adding SSM and Malfunction emissions, with an alternative operating scenario • Updating steady-state emissions for units: 2(Amine Plant Flare East), 4A (ESD Flare), AGI Flare, and FUG (facility-wide fugitives).
0039M6R1	12/17/13	Tech. Tev.	This revision consists of adding the Linam Ranch Gas Plant Compliance Plan table (see permit condition A114) required per the April 17, 2008 Settlement Agreement for Administrative Compliance Order No. AQCA 06-31, Paragraph 68(5) and Appendix A.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0039M6	11/3/11	Sig Rev.	<p>The expansion project will provide equipment and modifications necessary to expand the Linam Ranch Plant from 175 MMSCFD to 225 MMSCFD. This includes separate subprojects to expand and upgrade the inlet receiving, amine system, inlet/residue, compression, cold plant, and electrical infrastructure.</p> <ol style="list-style-type: none"> 1. The bottlenecked single 12-inch header feeding the V-111A/B inlet receivers will be replaced by two 20-inch headers. 2. Five vertical fixed-roof tanks with a VRU will be installed to receive the condensate. 3. This project will install a new Solar T60 turbine/compressor package which will provide 75 MMSCFD of additional compression capacity. To offset the environmental emissions of the new turbine, only three (3) of the TLA's or HBA's combined will be allowed to operate at any one time (currently a maximum of 2 TLA's and 3 HBA's are permitted to run simultaneously). The T60 turbine will provide enough inlet compression capacity to allow for the remaining TLA's and HBA's (currently in inlet service) to be dual serviced to provide additional residue compression. The dual service will also provide additional reliability at the plant and the ability to absorb lost production during residue turbine troubles or PM's. 4. To increase amine circulation rate in the treater, this project will install two new 300 hp, 5-stage Schlumberger REDA HP pumps with 25 hp booster pumps 5. To allow for the new pump operating pressure, the lean amine filter will be replaced with a Porous Media filter rated to match the rest of the treater system pressure MAWP of 550 psig. 6. This project will also re-tray the four (4) amine contactors with new moving valve trays to accommodate the higher amine circulation rate. 7. To upgrade the cold plant, this project will provide a second turboexpander which will parallel the existing unit. 8. A glycol contactor will be installed to fix the existing high moisture problem with the dehydration regen gas system.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
P094R1M1*	9/3/09	Admin	This Administrative Amendment will change the wording in the Settlement Agreement that is part of the Section 6.5 Compliance Plan. The work practice standards for monitoring for equipment leaks per 40 CFR §60.18(g), (h) and (i) as well as the requirements at 40 CFR Part 60, Subpart KKK are no longer modified by the added sentence as found in P009R1.
P094R1*	8/21/09	Renewal	Renewal consists of the following: 1. Replace Boilers EU 18, 19, 20, 21, 22 with 2 new 99.5 MMBtu/hr boilers REU 36 and 37. 2. Update the Clark TLA-6 engine (EU 6, 7) emission limits based on test data with a safety margin. 3. Revise the language limiting the Clark engines so that any 3 of the 4 may operate at the same time. 4. Increase the specified HP for EU 29, 30 based on manufacture's data. 5. Update the turbine emission limits for NO _x , CO & VOC based on manufacture's data and SO ₂ using AP 42 factors. 6. Increase the lb/hr SO ₂ and H ₂ S emission limits (based on a 3 hr rolling average.) 7. Change the inspection frequency of the CEM sampling probe. 8. Change of the frequency of RATA from bi-annual to tri-annual. 9. Update emission point stack parameters to reflect the field verified configuration and manufactures' data, as applicable. 10. Update existing tank information to accurately reflect the field verified configurations. 11. Installing an acid gas injection system 12. Increasing throughput in TK-2.
0039M5R1	6/3/09	Denied	Basis for Denial: Because Air Quality Permit 0039-M5 is being appealed, the March 30, 2009 letter requesting and administrative revision to address Specific Condition 039M5 3.g cannot be granted at this time.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0039M5	12/15/08	Significant Rev.	<p>The proposed changes are as follows.</p> <ol style="list-style-type: none"> 1. An Acid Gas Injection (AGI) well is being installed approximately 1 ½ miles north of the plant. Acid gas from the plant will be sent to the AGI for injection into an underground formation, with the goal of reducing emissions. Proposed changes at the plant itself consist of the addition of a few tanks and piping, and electric compressors. 2. The AGI location will include an emergency flare, electric compressors, and associated equipment and tanks. 3. Several technical and administrative revisions have been made since Permit 0039-M4 was issued; these are captured in this application. <p>This application also captures small changes such as addresses, telephone numbers, etc.</p> <p>The plant's compliance with standards and applicable requirements has been previously demonstrated in prior applications. In the interest of completeness, relevant portions of the previously-submitted and reviewed material is repeated here. This application focuses on demonstrating compliance with standards and applicable requirements on the part of the AGI and its associated flare. Thus, the new material in this application is primarily limited to material dealing with the AGI.</p> <p>Note that Unit 31 was previously permitted for replacement. However, an administrative revision was authorized to retain this unit. This application restores Unit 31 and adjusts emissions accordingly.</p>
0039M4R9	3/17/08	Admin	This revision consists of a change to the serial no. for unit 30, Solar Taurus T-70. The serial no. originally given for this unit was for a component and not the turbine package.
0039M4R8	2/26/08	Admin	The Department has completed a review of the application for the proposed project and has determined that the permit cannot be issued as an administrative revision.
0039M4R7	1/14/08	Admin	This revision consists of removing Emission Unit 31a, a Solar T-50-6200LS Turbine. Emissions Unit 31, a solar T4700 turbine remains on operational and regulated emissions unit at this facility.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0039M4R6		TBD	Reason for 0039M4R1 permit denial (non-compliance with 20.2.35.111 NMAC) is no longer correct as part A of the regulation was amended to allow “dispersion modeling approved by the department” for approval of stack height.
0039M4R5		Unknown	Admin Revision (not complete?)
0039M4R4	3/14/07	Admin Revision	Like kind engine replacement
0039M4R3		Withdrawn	Re-opening
0039M4R2	9/6/06	Administrative-type	changes that DEFS requested: 1. Table 1.1, Unit 34, Applicable NSPS Subpart – change from ‘NA’ to ‘Dc’. Unit 34 is subject to NSPS Subpart Dc as is noted in other places in the permit. 2. Condition 3.e, first sentence – Change ‘40 CFR parts 60, 61 and/or 63’ to ‘40 CFR 60.18 and 40 CFR 63.11’. This a more specific reference to the applicable regulation for flares. 3. Condition 3.e, second sentence – Change ‘Each flare’ to ‘Unit 4’. Only Unit 4 is subject to the visible emission requirements. 4. Condition 3.h, second sentence – Change ‘daily’ to ‘Monday, Wednesday and Friday of each week’. This less frequent calibration schedule was allowed in a letter from NMED dated 3/26/1996. I can provide this letter to you if needed. 5. Table 2.1, footnote 3 – Change ‘(30-day rolling average)’ to ‘(3-run average)’. See Table 1, Subcategory 7 of 40 CFR 63 Subpart DDD. The format of the standard for heaters/boilers less than 100 mmbtu/hr is the 3-run average. 6. Condition 4.m. – Change the condition reference to 1.k. 7. Condition 5.j – Change “No later than 45 days of” to ‘No later than 45 days after’.
0039M4R1	Denied 8/4/06		Replace existing ESD flare 4 with ESD flare 4A Initially Permit was Denied on August 4, 2006. See top entry for issued date and more information.
0039M4	08/07/06	Sig Mod	Two new boilers and replacement turbine
0039M3R2	10/20/05	Admin	Like kind turbine replacement
0039M3R1	08/24/05	Admin	Like kind turbine replacement
P094M3	NA	Withdrawn	
P094M2	09/02/05	TV Admin	Letter to address Tank VOC’s
P094M1	06/29/05	TV Admin	Letter to change responsible party
P094	12/03/04	TV permit reissued	

Permit Number	Issue Date	Action Type	Description of Action (Changes)
P094	12/03/03	Original TV permit	
0039M3	10/29/03		Update emission factors, replace turbine & remove flares
0039M2R1	11/12/03	Admin	Changed company name
0039M2	07/18/95		Increased plant capacity to 225 MMSCF/D
0039M1	NA		Withdrew 06/93
0039	07/08/74		Increased acid gas concentrations

6.0 **Public Response/Concerns:** The Public Notice was published January 15, 2014 in the *Hobbs Daily News-Sun*.

AQB received a citizen concern e-mail from Don Shepherd, with the National Park Service in Lakewood, CO, on January 23 2014. An initial e-mail letter was sent to Mr. Shepherd January 28, 2014.

7.0 **Compliance Testing:**

Unit No.	Compliance Test	Test Dates
6	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.3	1/6/2011 3/29/2011 6/30/2011 1/12/2012 7/2/2012
7	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.3	1/5/2011 3/29/2011 6/30/2011 1/6/2012
8	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.3	3/29/2011 1/7/2012
9	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.3	Out of Service ('04)
10	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.3	1/5/2011 1/5/2012
11	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.3	1/5/2011 1/5/2012 1/11/2012
28	Tested using portable emission analyzer in accordance with NSR permit 0039-M6 condition A205	12/4/2012 (scheduled)
29	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.2	1/6/2011 3/30/2011 1/13/2012
30	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.2	1/7/2011 3/31/2011 1/13/2012

Unit No.	Compliance Test	Test Dates
31a	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.2	1/7/2011 3/31/2011 1/13/2012
32b	Tested using portable emission analyzer in accordance with Title V permit P-094-R1-M1 condition 3.4.2.2	1/10/2011 4/1/2011 1/13/2012
34	Operational inspection monitoring in accordance with Title V permit P-094-R1-M1 condition 3.4.2.4	4/1/2011 3/30/2012
36	Operational inspection monitoring in accordance with Title V permit P-094-R1-M1 condition 3.4.2.4	4/1/2011 3/30/2012
37	Operational inspection monitoring in accordance with Title V permit P-094-R1-M1 condition 3.4.2.4	4/1/2011 9/30/2011 3/30/2012
38	Emission Test for Turbines (EU 29, 30, 31A, 32B), in accordance with NSR Permit 0039M3R1 A205 Turbines A. Periodic Testing (Units 28, 29, 30, and 31A)	1/16/2013 1/17/2013 1/18/2013
39	Emission Test for RICE Unit EU 6, in accordance with NSR Permit 0039M3R1 A201 Engines B. Periodic Testing (Units 6, 7, 8, 9, 10 and 11)	1/10/2013 9/30/2013
40	Emission Test for RICE Unit EU 7, in accordance with NSR Permit 0039M3R1 A201 Engines B. Periodic Testing (Units 6, 7, 8, 9, 10 and 11)	4/10/2013 Next test scheduled for week-ending 12/20/2013
41	Emission Test for RICE Unit EU 10 & EU 11, in accordance with NSR Permit 0039M3R1 A201 Engines B. Periodic Testing (Units 6, 7, 8, 9, 10 and 11)	4/10/2013
42	Emission Test for RICE Unit EU 8 & EU 9, in accordance with NSR Permit 0039M3R1 A201 Engines B. Periodic Testing (Units 6, 7, 8, 9, 10 and 11)	Did not operated in 2013

8.0 Startup and Shutdown:

- A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? No
- B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes
- C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes
- D. Were emissions from startup, shutdown, and scheduled maintenance operations calculated and included in the emission tables? Yes. This permit action incorporates SSM and Malfunction emissions.

9.0 Compliance and Enforcement Status: Not required for NSR

10.0 Modeling: TBD – waiting for Dave Heath’s report.

Pervious modeling:

For NSR Permit 0039M6, issued 11/3/11, a modeling waiver was submitted with the air quality application to modify this facility. The waiver was approved by Department Modeling staff and indicated the previous modeling performed for NSR 0039M5 was still valid. According to that modeling analysis, the facility demonstrated compliance with NAAQS and NMAAQS.

The modeling analysis for NSR Permit 0039M5, issued 12/15/8, Gi-Dong Kim Stated that the operation of the facility in the report neither “causes nor significantly contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for CO, NO₂ and SO₂; NMAAQS for CO, NO₂, SO₂, and H₂S; and PSD Class II Increment for NO₂ and SO₂.”

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

20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Comments
2.1	GENERAL PROVISIONS	Y	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	Y	Entire Facility	20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.
2.7	Excess Emissions	Y	Entire Facility	Applies to all facilities' sources
2.33	Gas Burning Equipment - Nitrogen Dioxide	N		The facility does not have existing gas burning equipment with a heat input > 1,000,000 million BTU/yr.
2.34	Oil Burning Equipment - Nitrogen Dioxide	N		This facility has no oil burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit.
2.35	Natural Gas Processing Plant – Sulfur	Y	Entire Facility	Portions of this facility are subject to the requirements of 20.2.35.7.A NMAC for “New Natural Gas Processing Plants for which a modification commenced on or after July 1, 1974.
2.37	Petroleum Processing Facilities	Y	Entire Facility	This facility is subject to the requirements of 20.2.37.7.C NMAC for “New Natural Gas Processing Plants for which a modification commenced on or after July 1, 1974 (see permitting history above).
2.38	Hydrocarbon Storage Facilities	Y	TK-VRU & TK-VRUTMP	This facility has units subject to this regulation.
2.61	Smoke and Visible Emissions	N		20.2.37 NMAC applies; therefore, 20.2.61 NMAC does not apply.

20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Comments
2.70	Operating Permits	Y	Entire Facility	PTE is > 100 TPY, Source is major for NO _x , CO, VOCs, SO ₂ , Formaldehyde, and Total HAPs as defined at 20.2.70.200 NMAC. HAPs is ≥ 10 tpy single
2.71	Operating Permit Fees	Y	Entire Facility	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Y	Entire Facility	PER > 10 pph or 25 tpy
2.73	NOI & Emissions Inventory Requirements	Y	Entire Facility	Applicable to all facilities that require a permit.
2.74	Permits-Prevention of Significant Deterioration	Y	Entire Facility	Source is not one of the 28 listed – PTE ≥ 250 tpy Applicable because the facility has PTE in excess of 250 tpy for NO _x , and CO; however, this permitting action does not trigger PSD requirements. This facility is a PSD major source that has never had a major modification requiring a BACT analysis.
2.75	Construction Permit Fees	N	Entire Facility	No, 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	Y	28, 29, 30, 31 32B, 34, 36, 37, FUG, AM-10, TK-VRU and TK-VRUTMP	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60, as amended through January 31, 2009 and 40 CFR 60 Subpart Dc, Kb, GG, KKK, and KKKK applies.
2.78	Emissions Standards for HAPs	N		This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61. May apply during demolition.
2.79	Permits - Nonattainment Areas	N		This facility is or is not located in a non-attainment area. Non-attainment Link
2.82	MACT Standards for Source Categories of HAPs	Y	28	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63. Subparts A, HH, and YYYY apply.

12.0 Federal Regulatory Analysis:

Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Applies (Y/N)	Comments
C	Federal Ambient Air Quality Standards	Y	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Comments
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NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Comments
A	General Provisions	Y	Applies if any other subpart applies and Dc, Kb, GG, KKK, LLL, and KKKK applies
40 CFR 60.40b, Subpart Dc	Small Industrial- Commercial- Institutional Steam Generating Units	Y (34, 36, and 37)	<p>Applicable: facility has steam generating units for which construction, modification or reconstruction is commenced after June 9, 1989 and that have a maximum design heat input capacity of 29 MW or less, but greater than or equal to 2.9 MW. This regulation applies to Units 34, 36 and 37.</p> <p>This regulation establishes standards of performance for small industrial-commercial-institutional steam generating units. Units 34, 36, and 37 were installed or modified after June 9, 1989, with a heat input capacity greater than or equal to 10 MMBtu/hr but less than 100 MMBtu/hr. The units will <u>only burn natural gas</u> and therefore will <u>not be subject</u> to NOx and SO2 emission standards or operating limitations under this regulation.</p>
40 CFR 60, Subpart, Kb	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	Y	<p>This facility has storage vessels with a capacity greater than or equal to 75 cubic meters (m³) that are used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.</p> <p>The facility operates a combine group of nine (9) tanks that ranges from 210 to 1,500 bbl (33.39 to 238.5 m³) that are part of the vapor recovery units. From these nine tanks, two tanks, one of 210 bbl and one of 400 bbl, have capacity lower than the threshold of 75 m³, thus they are exempted to comply with this regulation.</p> <p>The five (5) 750 bbl tanks are covered under this regulations since they were installed after July 23, 1984, implementation date, and they have a capacity equivalent to 119.2 m³. These units are noted in the application as TK-VRU-1 – TK-VRU-5.</p> <p>The remainder two (2) 1,500 bbl tanks were installed in 1954 and are also covered with this regulation since these tanks used to be pressurized tanks that were modified to be atmospheric tanks after the date this rule was implemented. These units are noted in the application as TK-VRUTMP1 – TK-VRUTMP2.</p> <p>Note: All of the above referenced condensate tanks are routed to VRU control devices (Units TK-VRU & TK-VRUTMP). The 2 VRUs are assigned allowable limits in the permit.</p> <p>The VRUs at the facility are inherent to the process and design of the facility. The VRUs are designed to recover vapor and return the vapors back into the low pressure gathering system. The tanks that meet this capacity and date of construction date are subject to this regulation and compliant with this subpart because VOC emissions are routed to a VRU with 95% efficiency.</p>
40 CFR 60.330 Subpart GG	Stationary Gas Turbines	Y	Units 29, 30, 31 and 32B have a heat input which is greater than the 10 MMBtu/hour threshold and were installed after the October 3, 1977 GG applicability date and before the Subpart KKKK

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Comments
			<p>applicability date of February 18, 2005.</p> <p>The emission limitations for the units are as follows:</p> <ol style="list-style-type: none"> 1) SO₂ emissions shall not exceed 150 ppmv at 15 percent oxygen and on a dry basis, and the fuel burned shall not contain total sulfur in excess 0.8 percent by weight (8000 ppmw) 2) NO_x emissions shall not exceed standards pursuant to §60.332
40 CFR 60, Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	Y	<p>Affected Facility with Leaks of VOC from Onshore Gas Plants. Any affected facility under paragraph (a) of this section that commences construction, reconstruction, or modification after January 20, 1984, is subject to the requirements of this subpart. The group of all equipment (each pump, pressure relief device, open-ended valve or line, valve, compressor, and flange or other connector that is in VOC service or in wet gas service, and any device or system required by this subpart) except compressors (defined in § 60.631) within a process unit is an affected facility. 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. Unit FUG is subject to this subpart. The applicant states in the application that the facility has instituted a Leak Detection and Repair program.</p>
40 CFR Part 60, Subpart KKKK	Standards of Performance for Stationary Combustion Turbines	Y	<p>Unit 28 has a heat input > the 10 MMBtu/hour and < the 100 MMBtu/hour thresholds and will be installed after the applicability date of February 18, 2005. Therefore, the unit will be subject when if installed.</p> <p>Determination of the subpart's emission limitations should be made if/when the unit is installed.</p>
40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions	Y	<p>The facility is a natural gas processing plant, including a sweetening unit followed by a sulfur recovery unit, constructed after January 20, 1984, and meets the applicability criteria of 40 CFR 60.640</p> <p>The facility is a natural gas processing but pursuant to 60.640(e) the sweetening unit is not subject to this subpart.</p> <p>The sweetening units produce acid gas that is completely re-injected into geologic strata or that is otherwise not released to the atmosphere; pursuant to §60.640(e) the sweetening units are not subject to this subpart.</p>
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark Ignition Internal Combustion	N	<p>Each of the six 2-SLB RICE Clark engine units at this facility was constructed before June 12, 2006. This subpart does not apply to these units.</p>

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Comments
	Engines		
NSPS 40 CFR Part 60 Subpart OOOO (Quad -O)	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution	Y	<p>The rule applies to “affected” facilities that are constructed, modified, or reconstructed after Aug 23, 2011 (40 CFR 60.5365): gas wells, including fractured and hydraulically refractured wells, centrifugal compressors, reciprocating compressors, pneumatic controllers, certain equipment at natural gas processing plants, sweetening units at natural gas processing plants, and storage vessels.</p> <p>This regulation establishes emission standards and compliance schedule for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities.</p> <p>The following are equipment constructed after August 23, 2011 and subject to this regulation: Turbine (TBD Unit 28), and equipment leaks associated with the equipment added in NSR 0039-M6R1.</p> <p>The acid gas from the amine unit (sweetening unit) at the facility is completely injected into oil or gas-bearing geological strata (AGI wells) and is not subject to 60.5405 through 60.5407, 60.5410(g), and 60.5423 of this subpart [per NSPS OOOO 60.5365(g)(4)]. When the acid gas flare is used during planned SSM and, the acid gas is not sent to the AGI wells, the facility is subject to SO₂ standards for the amine unit. Since the flare will be used as a control device during planned SSM, the flare is subject to NSPS 60.18. The permittee states the facility will comply with this regulation upon startup.</p> <p>The pneumatic devices located at the facility are not continuous bleed and therefore will not have applicable requirements under this regulation.</p> <p>The tanks are subject to NSPS Kb and are therefore not subject to this regulation.</p>

NESHAP Subpart (40 CFR 61)	Title	Applies (Y/N)	Comments
A	General Provisions	N	Applies if any other subpart applies; no subpart applies.

MACT Subpart (40 CFR 63)	Title	Applies (Y/N)	Comments
A	General Provisions	Y	Applies if any other subpart applies and HH and YYYY applies
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	Y	A glycol contactor is being added to the dehydration process to address a moisture problem with the existing regenerator gas system and will be subject as an affected source (TEG glycol dehydrators, 63.760(b)(2)). However, as actual benzene emissions are less than 1.0 Mg/yr (63.764(e)(ii)), the dehydrators are exempt and the records of the determination must be maintained as required in §63.774(d)(1).

MACT Subpart (40 CFR 63)	Title	Applies (Y/N)	Comments
			<p>The facility is a Major Source of HAPs, with 48 tpy of Total HAPs, 13 tpy of formaldehyde, and 24 tpy of n-Hexane.</p> <p>According to current estimates, the storage tanks do not meet the definition of “storage vessels with the potential for flash emissions” since the gas-to-oil-ratio (GOR) is less than 0.31 m³/l (40 CFR 63.761). If the GOR of the storage tanks changes at the facility and the tanks are later determined to meet the definition of “storage vessels with the potential for flash emissions” given in Subpart HH, DCP will comply with applicable requirements.</p> <p>No equipment at the facility is in VHAP service (greater than 10% HAP).</p>
40 CFR 63 Subpart HHH		N	This is not a transmission and storage facility.
40 CFR 63 Subpart YYYY	NESHAP for Stationary Combustion Turbines	Y	<p>Units 29, 30, 31 and 32B are existing units and pursuant to §63.6090(b)(4) have no requirements under this subpart or subpart A.</p> <p>Unit 28 is subject to this subpart if/when installed. Unit 28 is a new or reconstructed gas-fired combustion turbine. Pursuant to §63.6095(d), this TBD unit will be subject to the initial notification requirements set forth in §63.6145 but need not comply with any other requirement of Subpart YYYY until final action on compliance by the EPA is taken.</p>
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	N	<p>A facility is subject to this subpart if they own or operate a stationary RICE at a major of HAP emissions. The facility is a Major Source of HAPs, with 48 tpy of Total HAPs, 13 tpy of formaldehyde, and 24 tpy of n-Hexane.</p> <p>Units 6 and 7 are 2SLB RICE (construct date of 1974) with 200 hp; Units 8, 9, 10, and 11 are 2SLB RICE (construct date of 1954) with 1,267 hp.</p> <p>The facility engines all meet the criteria of affected sources that are existing stationary RICE per §63.6590(a)(1)(i):</p> <p><i>For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.</i></p> <p>Per §63.6600(c):</p> <p><i>If you own or operate any of the following stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or</i></p>

MACT Subpart (40 CFR 63)	Title	Applies (Y/N)	Comments
			<p><i>operating limitations in Tables 1b and 2b to this subpart: an existing 2SLB stationary RICE.</i></p> <p>Therefore, the engines so not have emission limitations or operating requirements.</p>
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	Y	<p>The facility is a major source of HAPS. Units 34, 36 and 37 are natural gas-fired affected sources because they are located at a major source of HAPs and are boilers and heaters as categorized in §63.7575.</p> <p>There are no emission limitations for the units under this regulation.</p> <p>There are operating requirements, per §63.7540(a)(10): <i>If your boiler or process heater has a heat input capacity of 10 million Btu per hour or greater, you must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as specified in paragraphs (a)(10)(i) through (vi) of this section. This frequency does not apply to limited-use boilers and process heaters, as defined in §63.7575, or units with continuous oxygen trim systems that maintain an optimum air to fuel ratio.</i></p>

Miscellaneous	Title	Applies (Y/N)	Comments
40 CFR 64	Compliance Assurance Monitoring	Y	<p>The sulfur recovery unit (Unit 5) has been removed and is no longer subject to CAM.</p> <p>Amine Unit AM-10 is a controlled major source and is subject to CAM.</p> <p>Units TK-VRU and TK-VRUTMP are a combined group of 9 tanks with integrated vapor recovery units (VRU). The VRUs at the facility are inherent to the process and design of the facility and are not subject to CAM. The VRUs are designed to recover vapors and return the vapors back into the low pressure gathering system.</p>

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

NSR Exempt Equipment (not entered into Tempo database)

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
			Serial No.	Capacity Units	Exempt Activity citation (e.g. Exemption List Item #5)
TK-1	Diesel	Unknown	N/A	500	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-3	Diesel	Unknown	N/A	250	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-7	Detergent	Unknown	N/A	300	Not a source of regulated pollutants
			N/A	gal	Not a source of regulated pollutants
TK-8	Solvent	Unknown	N/A	560	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-9	Boiler Treatment	Unknown	N/A	500	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-10	Boiler Treatment	Optisperse	APO200	500	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-11	Boiler Treatment	Unknown	NA2460	560	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-13	Clark Engine Lube Oil	Unknown	V-505	9590	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
			Serial No.	Capacity Units	Exempt Activity citation (e.g. Exemption List Item #5)
TK-14	Ethylene Glycol	Thor Steel	V-511a	1368	20.2.72.202.B.2.a NMAC
			687-1	gal	List Item #2.a
TK-15	Ethylene Glycol	Unknown	V-511b	1368	20.2.72.202.B.2.a NMAC
			10/28/3022	gal	List Item #2.a
TK-16	Clark Engine Lube Oil	Unknown	V-504a	410	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-17	Clark Engine Lube Oil	Unknown	V-504b	410	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-19	Lube Oil Make-up	Unknown	N9406	500	20.2.72.202.B.2.a NMAC
			95-108	gal	List Item #2.a
TK-20	Methanol Tank ³	Unknown	N/A	1130	20.2.72.202.B.5 NMAC
			N/A	gal	List Item #5
TK-21	Methanol Tank ³	Unknown	N/A	660	20.2.72.202.B.5 NMAC
			N/A	gal	List Item #5
TK-22	Corrosion Inhibitor	Spectrus	BD1501	500	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-23	Corrosion Inhibitor	Dianodic	DN2478	2000	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
			Serial No.	Capacity Units	Exempt Activity citation (e.g. Exemption List Item #5)
TK-27	Methanol Tank ³	API	Birmingham	168	20.2.72.202.B.5 NMAC
			TS-8540	bbbl	List Item #5
TK-30	Lube Oil Make-up	Unknown	N9406	500	20.2.72.202.B.2.a NMAC
			95-107	gal	List Item #2.a
TK-32	Amine DGA	Wyatt	95-V106a	5000	20.2.72.202.B.2.a NMAC
			53-412	gal	List Item #2.a
TK-33	DGA	Unknown	N/A	5000	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-41	Stabilized Crude	Unknown	N/A	66960	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-42	Produced Water	Wyatt	N/A	49980	Pressurized Vessel: Not a source of regulated pollutants
			53-567	gal	Not a source of regulated pollutants
TK-43	Produced Water	Wyatt	N/A	49980	Pressurized Vessel: Not a source of regulated pollutants
			53-566	gal	Not a source of regulated pollutants
TK-44	Condensate	Unknown	N/A	42000	Pressurized Vessel: Not a source of regulated pollutants

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
			Serial No.	Capacity Units	Exempt Activity citation (e.g. Exemption List Item #5)
			N/A	gal	Pressurized Vessel: Not a source of regulated pollutants
TK-45	Condensate	Unknown	N/A	42000	Pressurized Vessel: Not a source of regulated pollutants
			N/A	gal	Pressurized Vessel: Not a source of regulated pollutants
TK-46	Condensate	Unknown	N/A	42000	Pressurized Vessel: Not a source of regulated pollutants
			N/A	gal	Pressurized Vessel: Not a source of regulated pollutants
TK-47	Condensate	Unknown	N/A	42000	Pressurized Vessel: Not a source of regulated pollutants
			N/A	gal	Pressurized Vessel: Not a source of regulated pollutants
TK-48	Condensate	N/A	N/A	42000	Pressurized Vessel: Not a source of regulated pollutants
			N/A	gal	Pressurized Vessel: Not a source of regulated pollutants
TK-53	Propane	Unknown	N/A	77820	Pressurized Vessel: Not a source of regulated pollutants

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
			Serial No.	Capacity Units	Exempt Activity citation (e.g. Exemption List Item #5)
			N/A	gal	Pressurized Vessel: Not a source of regulated pollutants
TK-54	NGL	Unknown	N/A	67200	Pressurized Vessel: Not a source of regulated pollutants
			N/A	gal	Pressurized Vessel: Not a source of regulated pollutants
TK-55	Firewater	J&J Steel	N/A	9065	Not a source of regulated pollutants
			11-481	bb1	Not a source of regulated pollutants
TK-56	Firewater	Unknown	N/A	3500	Not a source of regulated pollutants
			W6537	bb1	Not a source of regulated pollutants
TK-57	Firewater	Unknown	N/A	147000	Not a source of regulated pollutants
			FW-318	gal	Not a source of regulated pollutants
TK-58	Softened Water	Unknown	N/A	21000	Not a source of regulated pollutants
			N/A	gal	Not a source of regulated pollutants

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
			Serial No.	Capacity Units	Exempt Activity citation (e.g. Exemption List Item #5)
TK-59	Water	Unknown	95-V700	500	Not a source of regulated pollutants
			N/A	bb1	Not a source of regulated pollutants
TK-GBW1	Gunbarrel Water Tank	Unknown	TBD	500	Not a source of regulated pollutants
			TBD	bb1	Not a source of regulated pollutants
TK-GBW2	Gunbarrel Water Tank	Unknown	TBD	500	Not a source of regulated pollutants
			TBD	bb1	Not a source of regulated pollutants
TK-9A	Antifreeze (Ethylene glycol)	Unknown	N/A	1000	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-25A	Sulfuric Acid	Unknown	N/A	2000	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-26A	Corrosion Inhibitor (Sodium Hypochlorite)	Unknown	N/A	300	Not a source of regulated pollutants
			N/A	gal	Not a source of regulated pollutants
TK-31A	Lube Oil	Unknown	N/A	500	20.2.72.202.B.2.a NMAC
			95-109	gal	List Item #2.a

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
			Serial No.	Capacity Units	Exempt Activity citation (e.g. Exemption List Item #5)
TK-34A	Lube Oil	Unknown	N-99406	500	20.2.72.202.B.2.a NMAC
			95-206	gal	List Item #2.a
TK-72	Skimmer Water (10% oil)	Unknown	N/A	19000	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-73	Solvent	Stoddard	N/A	500	20.2.72.202.B.2.a NMAC
			N/A	gal	List Item #2.a
TK-74	Soap	Unknown	N/A	305	Not a source of regulated pollutants
			N/A	gal	Not a source of regulated pollutants
TK-75	Soap	Unknown	N/A	305	Not a source of regulated pollutants
			N/A	gal	Not a source of regulated pollutants
TK-76	Slop Water	Unknown	N/A	8820	Not a source of regulated pollutants
			N/A	gal	Not a source of regulated pollutants
TK-77	Methanol Tank ³	TBD	TBD	500	20.2.72.202.B.5 NMAC
			TBD	gal	List Item #5
TK-78	Cylinder Oil Tank	TBD	TBD	1000	20.2.72.202.B.2.a NMAC

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
			Serial No.	Capacity Units	Exempt Activity citation (e.g. Exemption List Item #5)
			TBD	gal	List Item #2.a
TK-79	Crankcase Oil Tank	TBD	TBD	1000	20.2.72.202.B.2.a NMAC
			TBD	gal	List Item #2.a
TK-80	Waste lube Tank	TBD	TBD	1000	20.2.72.202.B.2.a NMAC
			TBD	gal	List Item #2.a
TK-1325	Cylinder Oil Tank	TBD	TBD	1000	20.2.72.202.B.2.a NMAC
			TBD	gal	List Item #2.a
TK-1327	Crankcase Oil Tank	TBD	TBD	1000	20.2.72.202.B.2.a NMAC
			TBD	gal	List Item #2.a
TK-1329	Waste lube Tank	TBD	TBD	1000	20.2.72.202.B.2.a NMAC
			TBD	gal	List Item #2.a
TK-1370	Methanol Tank ³	TBD	TBD	500	20.2.72.202.B.5 NMAC
			TBD	gal	List Item #5
TK-2801	Turbine lube Tank	TBD	TBD	500	20.2.72.202.B.2.a NMAC
			TBD	gal	List Item #2.a

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

MONITORING SPECIFICATIONS:

Date of [Monitoring Protocol](#) used for Engines: 11/25/13

Date of [Monitoring Protocol](#) used for Turbines: 6/13/13

Date of [Monitoring Protocol](#) used for Flares: 9/20/12

Date of [Monitoring Protocol](#) used for Cooling Towers: 11/8/13

Date of [Monitoring Protocol](#) used for Boilers: 11/8/13

Date of [Monitoring Protocol](#) used for Dehydrators: 11/8/13

15.0 For Title V action: Cross Reference Table - Not required for NSR

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

A. None