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

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

Certified Mail No: xxxx xxxx xxxx xxxx  
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**NSR Permit No:** 1313-M6  
**Facility Name:** Western Refining -Wingate Facility

**Permittee Name:** Western Refining Southwest, Inc.  
**Mailing Address:** 92 Giant Crossing Road  
Gallup, NM 87301

**TEMPO/IDEA ID No:** 884-PRN20150001  
**AIRS No:** 35-031-0004

**Permitting Action:** Significant Permit Revision  
**Source Classification:** PSD Major and Title V Major

**Facility Location:** 714,000m E by 3,935,000m N, Zone 12  
**County:** McKinley

**Air Quality Bureau Contact** Daren K. Zigich  
**Main AQB Phone No.** (505) 476-4300

**Richard L. Goodyear, PE**  
**Bureau Chief**  
**Air Quality Bureau**

**Date**

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

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**PART B GENERAL CONDITIONS (Attached)**

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

**PART A FACILITY SPECIFIC REQUIREMENTS**

**A100 Introduction**

- A. This permit, NSR 1313M6, supersedes all portions of Air Quality Permit 1313M5R1, issued September 24, 2013; Permit 1313M5R2 issued June 11, 2013; Permit 1313M5R3 issued November 26, 2014 and Permit 1313M5R4 issued December 23, 2014 except the portion requiring compliance tests. Compliance test conditions from previous permits, if not completed, are still in effect, in addition to compliance test requirements contained in this permit.

**A101 Permit Duration (expiration)**

- A. The term of this permit is permanent unless withdrawn or cancelled by the Department.

**A102 Facility: Description**

- A. The previous function of the facility was to fractionate hydrocarbon liquids from a natural gas liquid stream into propane, n-butane, iso-butane and other fractions using a distillation train. After this modification the facility’s primary function will be to operate as a petroleum bulk terminal that performs crude oil and LPG storage and transloading activities.
- B. This facility is located approximately 6 miles east of Gallup, New Mexico in McKinley County.
- C. This modification consists of changing the primary function of the facility from a natural gas processing plant to a crude oil trans-loading facility. As a result, the facility will now be categorized under the SIC code for petroleum bulk stations and terminals (SIC code 5171) instead of under the category for natural gas liquids (SIC code 1321). In addition to the crude trans-loading operations, Western will install a vapor combustion unit (VCU-1) and two external floating roof tanks (TK-1 and TK-2) and retire or remove existing emissions units 7, 11, 12, 19, 27, 28, 29. The description of this modification is for informational purposes only and is not enforceable.
- D. [Table 102.A](#) and [Table 102.B](#) show the total potential emissions from this facility for information only, not an enforceable condition, excluding exempt sources or activities.

**Table 102.A: Total Potential Pollutant Emissions from Entire Facility**

<b>Pollutant</b>	<b>Emissions (tons per year)</b>
Nitrogen Oxides (NOx)	10.3

**Table 102.A: Total Potential Pollutant Emissions from Entire Facility**

Pollutant	Emissions (tons per year)
Carbon Monoxide (CO)	25.7
Volatile Organic Compounds (VOC) *	217.4
Sulfur Dioxide (SO <sub>2</sub> )	0.7
Total Suspended Particulates (TSP)	1.3
Particulate Matter less than 10 microns (PM <sub>10</sub> )	0.5
Particulate Matter less than 2.5 microns (PM <sub>2.5</sub> )	0.4
Greenhouse Gas (GHG)	<75,000

\* VOC total includes emissions from Fugitives, SSM and Malfunctions

**Table 102.B: Total Potential \*HAPS that exceed 1.0 ton per year**

Pollutant	Emissions (tons per year)
n-hexane	1.0
Total HAPs **	9.2

\* HAP emissions are already included in the VOC emission total.

\*\* The total HAP emissions may not agree with the sum of individual HAPs because only individual HAPs greater than 1.0 tons per year are listed here.

**A103 Facility: Applicable Regulations**

- A. The permittee shall comply with all applicable sections of the requirements listed in [Table 103.A](#).

**Table 103.A: Applicable Requirements**

Applicable Requirements	Federally Enforceable	Unit No.
20.2.1 NMAC General Provisions	X	Facility
20.2.3 NMAC Ambient Air Quality Standards	X	Facility
20.2.7 NMAC Excess Emissions	X	Facility
20.2.61 NMAC Smoke and Visible Emissions		VCU-1
20.2.70 NMAC Operating Permits	X	Facility
20.2.71 NMAC Operating Permit Emission Fees	X	Facility
20.2.72 NMAC Construction Permit	X	Facility
20.2.73 NMAC Notice of Intent and Emissions Inventory Requirements	X	Facility
20.2.74 NMAC Permits - PSD	X	Facility
20.2.75 NMAC Construction Permit Fees	X	Facility
20.2.77 NMAC New Source Performance	X	18, TK-1 and TK-2
40 CFR 50 National Ambient Air Quality Standards	X	Facility
40 CFR 60, Subpart A, General Provisions	X	18, TK-1 and TK-2
40 CFR 60, Subpart Kb	X	TK-1 and TK-2
40 CFR 60, Subpart NNN	X	18

**Table 103.A: Applicable Requirements**

Applicable Requirements	Federally Enforceable	Unit No.
40 CFR 60, Subpart RRR	X	18
40 CFR 64, Compliance Assurance Monitoring	X	RC-LOAD and VCU-1

**A104 Facility: Regulated Sources**

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

**Table 104: Regulated Sources List**

Unit No.	Source Description	Make Model	Serial No.	Maximum Capacity/ Permitted Capacity	Construction Date	Other
16	Fugitive emissions from Truck Rack System	NA	NA	TBD	<1997	NA
18	Butamer Unit	NA	NA	NA	1998	NA
20	Fugitive emissions from Propane Storage and Rail Loading	NA	NA	NA	NA	NA
21	Fugitive emissions from Isobutane Storage and Rail Loading	NA	NA	NA	NA	NA
22	Fugitive emissions from N-butane Storage and Rail Loading	NA	NA	NA	NA	NA
23	Fugitive emissions from Pentanes (natural gasoline) Storage and Rail Loading	NA	NA	NA	NA	NA
24	Fugitive emissions from Ethyl Mercaptan Storage and Rail Loading	NA	NA	NA	NA	NA

**Table 104: Regulated Sources List**

<b>Unit No.</b>	<b>Source Description</b>	<b>Make Model</b>	<b>Serial No.</b>	<b>Maximum Capacity/ Permitted Capacity</b>	<b>Construction Date</b>	<b>Other</b>
25	Fugitive emissions from Product Pumping System	NA	NA	NA	NA	NA
26	Blowdown from Loading/Off-Loading Hoses at LPG Truck and Rail Racks	NA	NA	NA	NA	NA
Non-Fugitive LPG Activities	LPG Loading Operations, LPG system pressure reliefs and maintenance activities	NA	NA	NA	NA	Controlled by Flare Unit 17. See Title V permit NN OP 05-011 issued by the Navajo Nation EPA
TK-1	External Floating Roof Crude Oil Tank	TBD	TBD	120,000 bbl	TBD	NSPS Kb
TK-2	External Floating Roof Crude Oil Tank	TBD	TBD	120,000 bbl	TBD	NSPS Kb
TR-HOSE	Hose disconnect fugitive emissions from truck unloading	N/A	N/A	2160 bbl/hr / 9.125 MMbbl/yr	TBD	N/A
RC-FUG	Fugitive emissions from crude oil rail loading	N/A	N/A	N/A	TBD	N/A
RC-LOAD	Crude Oil Rail loading emissions captured by the VCU	N/A	N/A	3465 bbl/hr / 14.6 MMbbl/yr	TBD	N/A
RC-UNCAP	Crude Oil Rail loading emissions uncaptured by the VCU	N/A	N/A	3465 bbl/hr / 14.6 MMbbl/yr	TBD	N/A
RC-HOSE	Hose disconnect fugitive emissions from Crude Oil Rail Loading	N/A	N/A	3465 bbl/hr / 14.6 MMbbl/yr	TBD	N/A



**Table 106.A: Allowable Emissions**

Unit No.	NO <sub>x</sub> <sup>1</sup> pph	NO <sub>x</sub> <sup>1</sup> tpy	CO pph	CO tpy	VOC pph	VOC tpy	SO <sub>2</sub> pph	SO <sub>2</sub> tpy	TSP pph	TSP tpy	PM <sub>10</sub> pph	PM <sub>10</sub> tpy	PM <sub>2.5</sub> pph	PM <sub>2.5</sub> tpy
20	-	-	-	-	*	23.6	-	-	-	-	-	-	-	-
21	-	-	-	-	*	19.3	-	-	-	-	-	-	-	-
22	-	-	-	-	*	12.8	-	-	-	-	-	-	-	-
23	-	-	-	-	*	16.3	-	-	-	-	-	-	-	-
24	-	-	-	-	*	5.8	-	-	-	-	-	-	-	-
25	-	-	-	-	*	20.4	-	-	-	-	-	-	-	-
26	-	-	-	-	*	1.1	-	-	-	-	-	-	-	-
TK-1	-	-	-	-	*	4.7	-	-	-	-	-	-	-	-
TK-2	-	-	-	-	*	4.7	-	-	-	-	-	-	-	-
TR-HOSE	-	-	-	-	*	1.7	-	-	-	-	-	-	-	-
RC-FUG	-	-	-	-	*	5.9	-	-	-	-	-	-	-	-
RC-LOAD / RC-UNCAP	-	-	-	-	*	22.4	-	-	-	-	-	-	-	-
RC-HOSE	-	-	-	-	*	0.8	-	-	-	-	-	-	-	-
Haul-Rd	-	-	-	-	-	-	-	-	0.5	1.0	0.1	0.2	0.03	0.05
VCU-1	4.9	10.3	12.2	25.7	12.1	25.6	<	<	<	<	<	<	<	<

1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO<sub>2</sub>

2 For Title V facilities, the Title V annual fee assessments are based on the sum of allowable tons per year emission limits in Sections A106 and A107.

“-” indicates the application represented emissions of this pollutant are not expected.

“<” indicates the application represented uncontrolled emissions are less than 1.0 pph or 1.0 tpy for this pollutant. Allowable limits are not imposed on this level of emissions, except for flares and pollutants with controls.

“\*” indicates hourly emission limits are not appropriate for this operating situation.

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

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

**Table 107.A: Allowable SSM and Malfunction Units, Activities, and Emission Limits**

Unit No.	Description	VOC (tpy)	H <sub>2</sub> S (pph)	H <sub>2</sub> S (tpy)
SSM/M from TK-1 & TK-2, VCU-1 and Liquefied Petroleum Systems	<sup>1</sup> Tank degassing of TK-1 and/or TK-2 VCU-1 bypass and venting of Liquefied Petroleum during Routine and Predictable Startup, Shutdown, and/or Maintenance (SSM)  <sup>1</sup> venting of crude oil loading vapors and Liquefied Petroleum Due to Malfunction	10	<	<

1. This authorization does not include VOC combustion emissions. “<” indicates the application represented that uncontrolled venting or blowdown emissions of H<sub>2</sub>S are less than 0.1 pph or 0.44 tpy. Allowable limits, monitoring, and recordkeeping are not required on this level of H<sub>2</sub>S venting or blowdown emissions.

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

C. Combined SSM and Malfunction Emissions (VOCs)

**Requirement:**

**(1) Compliance Method**

The permittee shall sample crude oil from either TK-1 or TK-2 and perform an analysis once every year and, on a monthly basis, complete the following monitoring and recordkeeping to demonstrate compliance with the allowable emission limits in Table 107.A for routine or predictable startup, shutdown, and maintenance (SSM); and/or malfunctions (M) herein referred to as SSM/M.

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

(a) All emissions due to routine or predictable startup, shutdown, and/or maintenance (SSM) must be included under and shall not exceed the 10 tpy SSM/M emission limit in this permit. For emissions due to malfunctions, the permittee has the option to report these malfunction emissions as excess emissions under 20.2.7.110.A(2) NMAC or include the emissions under the 10 tpy limit.

(b) Once emissions from a malfunction event are submitted in the final report (due no later than ten days after the end of the excess emissions event) per 20.2.7.110.A(2) NMAC, the event is considered an excess emission and cannot be applied toward the 10 tpy SSM/M limit in this permit.

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

If the monthly rolling 12-month total of SSM/M exceeds the 10 tpy emission limit, the

permittee shall report the emissions as excess emissions in accordance with 20.2.7.110 NMAC.

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

Emissions that are due entirely or in part to poor maintenance, careless operation, or any other preventable equipment breakdown shall not be included under the 10 tpy SSM/M emission limit. These emissions shall be reported as excess emissions in accordance with 20.2.7.110 NMAC.

**Monitoring:** The permittee shall monitor all SSM/M events. The permittee shall monitor the permitted routine and predictable startups and shutdowns and scheduled maintenance events of the crude oil storage and loading systems including TK-1 and TK-2, VCU-1 and the liquefied petroleum storage and loading systems. The permittee shall also monitor all malfunction events that result in VOC emissions including the identification of the equipment or activity that is the source of emissions.

**Recordkeeping:**

**(1) Compliance Method**

- (a) Each month records shall be kept of the cumulative total of all VOC emissions related to SSM/M during the first 12 months and, thereafter of the monthly rolling 12 month total of SSM/M VOC emissions. Any malfunction emissions that have been reported in a final excess emissions report per 20.2.7.110.A(2) NMAC, shall be excluded from this total.
- (b) Records shall also be kept of the crude oil analysis, the percent VOC of the vented gas and the calculations that are used to calculate the VOC emissions from crude oil. For liquefied petroleum products records shall be kept of the type of liquefied petroleum product, the volume of total gas vented in MMscf used to calculate the VOC emissions and the calculations. All liquefied petroleum products shall be assumed to be 100 percent VOC.
- (c) The permittee shall identify the equipment or activity and shall describe the event that is the source of emissions.

**(2) Emissions included Under Permit Limit or Reported as Excess Emissions**

The permittee shall record whether emissions are included under the 10 tpy permit limit for SSM/M or if the event is included in a final excess emissions report per 20.2.7.110.A(2) NMAC.

**(3) Condition B109 Records**

The permittee shall keep records in accordance with Condition B109 of this permit except for the following:

- (a) The requirement to record the start and end times of SSM/M events shall not apply to venting of known quantities of VOCs as long as the emissions do not exceed the SSM/M emission limit.

(b) The requirement to record a description of the cause of the event shall not apply to SSM/M events as long as the emissions do not exceed the SSM/M emission limit.

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

**A108 Facility: Allowable Operations**

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

**A109 Facility: Reporting Schedules**

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

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

- A. Fuel and Fuel Sulfur Requirements (Unit VCU-1)

**Requirement:** Emission unit VCU-1 shall combust only natural gas containing no more than 0.75 grains of total sulfur per 100 dry standard cubic feet and crude oil vapors from crude oil containing no more than 300 ppmw H<sub>2</sub>S.

**Monitoring:** None

**Recordkeeping:** The permittee shall demonstrate compliance with the natural gas limit on total sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, or fuel gas analysis, specifying the allowable limit or less. If fuel gas analysis is used, the analysis shall not be older than one year.

The permittee shall demonstrate compliance with the crude oil limit on H<sub>2</sub>S by maintaining records of a current crude oil H<sub>2</sub>S and total sulfur analysis, specifying the allowable limit or less. The crude oil H<sub>2</sub>S and total sulfur analysis shall not be older than one year.

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

**A111 Facility: 20.2.61 NMAC Opacity**

- A. 20.2.61 NMAC Opacity Limit (Unit VCU-1)

**Requirement:** Visible emissions from unit VCU-1 shall not equal or exceed an opacity of 20 percent.

**Monitoring:** Once every 90 days of operation, an opacity measurement shall be performed on each Unit for a minimum of 10 minutes in accordance with the procedures of 40 CFR 60, Appendix A, Method 9.

Once every calendar year an opacity measurement shall be performed on each Unit for a minimum of 10 minutes in accordance with the procedures of 40 CFR 60, Appendix A, Method 9.

**Recordkeeping:** The permittee shall record the opacity measures with the corresponding opacity readings in accordance with Method 9 in 40 CFR 60, Appendix A.

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

**A112 Facility: Haul Roads – Not Required**

**A113 Facility: Initial Location Requirements – Not Required**

**A114 Facility: Relocation Requirements – Not Required**

**A115 Alternative Operating Scenario – Not Required**

**A116 Compliance Plan – Not Required**

**A117 Reducing Facility Emissions**

- A. Certain terms and conditions of this permit retire or remove specific regulated equipment, Units 7, 11, 12, 19, 27, 28 and 29 and the associated allowable emissions that were permitted previously and currently remain in the facility's Title V operating permit P117R2M1. The compliance date for retirement or removal of Units 7, 11, 12, 19, 27, 28 and 29 is the date of issuance of this permit.

**EQUIPMENT SPECIFIC REQUIREMENTS**

**OIL AND GAS INDUSTRY**

**A200 Oil and Gas Industry**

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

**A201 Engines – Not Required**

**A202 Glycol Dehydrators – Not Required**

**A203 Tanks, Loading and Loading Disconnects**

A. 40 CFR 60, Subpart Kb (Tanks TK-1 and TK-2)

<b>Requirement:</b> The tanks are subject to 40 CFR 60, Subpart Kb and the permittee shall comply with the VOC standard as specified by 40 CFR 60.112b.
<b>Monitoring:</b> The permittee shall comply with the testing requirements of 40 CFR 60.113b and the monitoring requirements of 40 CFR 60.116b.
<b>Recordkeeping:</b> The permittee shall maintain records as specified by 40 CFR 60.115b and 60.116b.
<b>Reporting:</b> The permittee shall comply with reporting requirements of 40 CFR 60.115b.

B. Truck Unloading – Crude oil (Units TR-HOSE, Haul-Rd)

<b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A shall be demonstrated by limiting the total annual crude oil truck unloading (delivery) volume to 9,125,000 barrels per year.
<b>Monitoring:</b> The permittee shall monitor the crude oil truck unloading volume on a monthly basis.
<b>Recordkeeping:</b> The permittee shall record the monthly crude oil truck unloading volume. Each month during the first 12 months of monitoring the permittee shall record the cumulative crude oil truck unloading volume and after the first 12 months of monitoring, the permittee shall calculate and record a monthly rolling 12-month total unloading volume.
Records shall also be maintained in accordance with Section B109.
<b>Reporting:</b> The permittee shall report in accordance with Section B110.

C. Railcar Loading – Crude oil (Units RC-LOAD / RC-UNCAP and RC-HOSE)

<b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A shall be demonstrated by limiting the total annual crude oil loadout volume to 14,600,000 barrels per year and by capturing, routing and controlling the loading emissions through the use of a cap and capture loadout device, closed vent system and Vapor Combustion Unit (VCU-1).
<b>Monitoring:</b> The permittee shall monitor the crude oil loadout volume on a monthly basis.
<b>Recordkeeping:</b> The permittee shall record the monthly crude oil loadout volume. Each month during the first 12 months of monitoring the permittee shall record the cumulative crude oil loadout volume and after the first 12 months of monitoring, the permittee shall calculate and

record a monthly rolling 12-month total loadout volume.

Records shall also be maintained in accordance with Section B109.

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

D. Railcar Loading – Liquefied Petroleum Products (Unit 26 – Hose Blowdowns)

**Requirement:** Compliance with the allowable emission limits in Table 106.A shall be demonstrated by limiting the total number of Truck Rack blowdown events to 9,912 and Rail Rack blowdown events to 5,676 per year.

**Monitoring:** The permittee shall monitor the Truck Rack blowdown events and Rail Rack blowdown events on a monthly basis.

**Recordkeeping:** The permittee shall record the monthly Truck Rack blowdown events and monthly Rail Rack blowdown events. Each month during the first 12 months of monitoring the permittee shall record the cumulative Truck Rack blowdown events and the cumulative Rail Rack blowdown events and after the first 12 months of monitoring, the permittee shall calculate and record a monthly rolling 12-month total Truck Rack blowdown events and a monthly rolling 12-month total Rail Rack blowdown events.

Records shall also be maintained in accordance with Section B109.

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

**A204 Heaters/Boilers - Not Required**

**A205 Turbines - Not Required**

**A206 Vapor Combustor Units**

A. Operation (Unit VCU-1)

**Requirement:** Crude Oil Railcar loadout shall be controlled by the unit VCU-1. The vapor combustion unit shall be maintained and operated to achieve the emissions limits stated in Section A106. During all crude oil railcar loadout the vapor combustion unit shall maintain proper combustion control over the entire loading period, defined as the period crude oil is flowing into the railcar, by maintaining the temperature at or above the temperature recorded during the latest stack test that demonstrated compliance with the emission limits in Section A106.

**Monitoring:** The presence of combustion in the thermal oxidizer shall be monitored continuously using a flame scanner, or any other equivalent device, **and** a thermocouple to detect the presence of a flame and proper operation. In addition, the vapor combustion unit shall be equipped with a well-maintained alarm that signals non-combustion during operation and an associated loadout interlock that automatically shuts down the crude oil loadout. Additionally,

time stamps (date and time) of each alarm shall be continuously monitored.

The monitoring and recording devices shall be maintained in good operating condition.

**Recordkeeping:** The permittee shall maintain the following records in accordance with Section B109:

- Strip chart or electronic records of the time stamp for each alarm signaling non-combustion during operation.
- Manual or electronic record of date and time when loadout is performed without VCU operating.
- Strip chart or electronic records of thermocouple temperature readings. Reading shall be recorded a minimum of once every 15 minutes.
- Maintenance records for the Vapor Combustion Unit and monitoring devices.

The permittee shall maintain records in accordance with Section in B109.

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

#### B. Railcar Loading Vapor Capture Device Inspection (Unit RC-LOAD / RC-UNCAP)

**Requirement:** Compliance with the allowable emission limits in Table 106.A shall be demonstrated by operating a vapor capture system, that captures and routes VOCs emissions from all railcars being loaded to the vapor combustion unit VCU-1.

**Monitoring:** At least once per month, the permittee shall inspect the vapor capture system for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatch covers, or other closure devices. In the event that a leak or defect is detected, the permittee shall repair the leak or defect as soon as practicable and in a manner that minimizes VOC and HAPs emissions to the atmosphere.

**Recordkeeping:** The permittee shall record the results of the vapor recovery unit inspections chronologically, noting any maintenance or repairs that are required.

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

#### C. Initial Compliance Test (Unit VCU-1)

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

**Monitoring:** The permittee shall perform an initial compliance test in accordance with the General Testing Requirements of Section B111. Emission testing is required for NO<sub>x</sub>, CO and VOC. Testing shall occur during periods of near maximum crude oil vapor production (equal to or greater than 90 percent of the maximum hourly loading capacity 3465 bbl/hr) and shall occur during periods when the ambient temperature is above 60° F. Each test run (sample time) may be limited to less than 1-hour to correspond with periods of equal or greater than 90 percent of maximum hourly loading capacity and near maximum crude oil vapor production.

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

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

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

**A207 Sulfur Recovery Unit - Not Required**

**A208 Amine Unit - Not Required**

**A209 Fugitives**

A. Leak Detection and Repair Program (Units 16, 18, 20, 21, 22, 23, 24, 25 and RC-FUG)

**Requirement:** To demonstrate compliance with the allowable emission limits in Table 106.A, the permittee shall limit weight percent of VOC in key containers or pipeline to those values used to calculate allowable emission limits, and repair component leaks (>10,000 ppm) within 30 days of discovery.

**Monitoring:** The permittee shall conduct an annual chemical analysis of the pipe contents; and an annual inspection of components in VOC service (VOC weight >10%). An inspection of components in VOC service shall also be performed within 15 days of any maintenance or repair that affects components. The permittee shall place a visible tag on all components that have a liquid leak or a vapor leak greater than 10,000 ppm VOCs until those components are repaired.

**Recordkeeping:** The permittee shall maintain the following records.

- 1) Component identification or description and location
- 2) Date a leak is detected
- 3) Dates of attempts to repair
- 4) Designation of "repair delayed" and reason for delay if the leak is not repaired within 30 days of leak discovery
- 5) Date of successful leak repair

**Reporting:** The permittee shall report the following in accordance with Section B110: 1) The number of leaking components discovered, 2) The number of leaking components not repaired within 30 days, and 3) The duration of the leaks that exceeded 30 days.

B. 40 CFR 60, Subpart NNN (Unit 18, Butamer Deisobutanizer)

**Requirement:** The unit is subject to 40 CFR 60, Subpart NNN and the permittee shall comply with all applicable requirements of Subpart A and Subpart NNN.

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

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

**Reporting:** The permittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and NNN.

C. 40 CFR 60, Subpart RRR (Unit 18, Isobutanizer Reactors)

<p><b>Requirement:</b> The units are subject to 40 CFR 60, Subpart RRR and the permittee shall comply with all applicable requirements of Subpart A and Subpart RRR.</p>
<p><b>Monitoring:</b> The permittee shall comply with all applicable monitoring requirements of 40 CFR 63, Subpart A and Subpart RRR.</p>
<p><b>Recordkeeping:</b> The permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63, Subpart A and Subpart RRR.</p>
<p><b>Reporting:</b> The permittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and RRR.</p>

D. Non-Fugitive LPG Activities

<p><b>Requirement:</b> The following non-fugitive LPG activities shall be controlled by a vapor capture system and routed to Flare Unit 17 permitted under Title V permit NN OP 05-011, issued by the Navajo Nation EPA:</p> <ol style="list-style-type: none"> <li>1) Venting of 'liquid empty' LPG railcars prior shipment / loading</li> <li>2) Venting of fuel gas – the 'push' gas used to offload LPG railcars.</li> <li>3) Venting from LPG storage tanks / pumps / piping as a means to maintain safe operating limits.</li> <li>4) Venting for maintenance purposes.</li> </ol>
<p><b>Monitoring:</b> At least once per month, the permittee shall inspect the vapor capture system for defects that could result in air emissions. Defects include, but are not limited to, visible cracks, holes, or gaps; broken, cracked, or otherwise damaged seals or gaskets on closure devices; and broken or missing hatch covers, or other closure devices. In the event that a leak or defect is detected, the permittee shall repair the leak or defect as soon as practicable and in a manner that minimizes VOC and HAPs emissions to the atmosphere.</p>
<p><b>Recordkeeping:</b> The permittee shall record the results of the vapor recovery unit inspections chronologically, noting any maintenance or repairs that are required.</p>
<p><b>Reporting:</b> The permittee shall report in accordance with Section B110.</p>

**PART B GENERAL CONDITIONS (Attached)**

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