

**Draft-Statement of Basis - Narrative**

**Title V**

**Type of Permit Action:** TV Renewal

**Facility:** Carracas CDP Compressor Station

**Company:** Harvest Four Corners LLC

**Permit No(s):** 0968M5R6 (and revisions through M5R11) and P168R4

**Tempo/IDEA ID No.:** 1009 - PRT20190002

**Permit Writer:** Urshula Bajracharya

**Fee Tracking (not required for Title V)**

<b>Tracking</b>	<b>NSR tracking entries completed:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	
	<b>NSR tracking page attached to front cover of permit folder:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	
	<b>Paid Invoice Attached:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	
	<b>Balance Due Invoice Attached:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No	
	<b>Invoice Comments:</b>	

  

<b>Permit Review</b>	<b>Date to Enforcement:</b> TBD	<b>Date of Enforcement Reply:</b> TBD
	<b>Date to Applicant:</b> TBD	<b>Date of Applicant Reply:</b> TBD
	<b>Date to EPA:</b> TBD or N/A	<b>Date of EPA Reply:</b> TBD or N/A
	<b>Date to Supervisor:</b> 5/22/2020, 2/16/2021, 4/9/2021.	

**1.0 Plant Process Description:**

The Carracas CDP Facility compresses and dehydrates natural gas for pipeline transport. Natural gas is delivered via pipeline from independent producers and metered as it enters the facility. The natural gas stream typically contains produced water, which is separated from the gas stream via inlet separator and stored in above ground storage tanks. The natural gas is then compressed for pipeline transmission using compressors driven by the natural gas fired reciprocating internal combustion engines. The compressed gas stream is routed to triethylene glycol (TEG) dehydrators where the TEG solution comes into contact with the natural gas and removes water and some of the hydrocarbons. Rich TEG solution is regenerated by boiling off the water and hydrocarbons and reclaiming the glycol. Emission from the still vent portion of the dehydrators is routed via a closed vent system to process flares for emissions control. Natural gas turbine generators provide auxiliary power for the facility. Operation of the compressor engines is determined by market and pipeline conditions. The compressor engines may be shut down and restarted to respond to changing pipeline pressures, or for routine equipment maintenance. Compressor and piping blowdown emissions occur during startup, shutdown and routine maintenance operations. Insignificant emission sources at the facility include the various storage tanks, and fugitive emissions from process piping.

**2.0 Description of this Modification:**

This application is being submitted to renew the Title V operating permit. The applicable regulation is 20.2.70 New Mexico Administrative Code (NMAC). The lowest level regulatory citation is 20.2.70.300.B(2) NMAC.

This Title V renewal is incorporating changes made in NSR permit 0968M5R7 through 0968M5R11. The facility is/has removed four (4) RICE engines, four (4) TEG dehydrator, four (4) reboilers associated with dehydrators and two (2) flares associated with the dehydrators.

**3.0 Source Determination:**

1. The emission sources evaluated include Carracas Central Delivery Point facility.

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:**

Title V action does not determine PSD applicability; see the History Table for a summary of previous PSD applicability determinations.

**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)
P168R4*	TBD	TV Renewal	This is a TV renewal and incorporates changes from NSR Administrative Permits 0968M5R7 through 968M5R11 since the previous TV Permit P168R3.
0968M5R11*	01/15/2020	Administrative Revision	Administrative revision for like-kind engine replacement for unit 2.
0968M5R10*	10/21/2019	Administrative Revision	Administrative revision for like-kind engine replacement for unit 8.
0968M5R9*	04/12/2019	Administrative Revision	Administrative revision to remove compressor engines unit 17, 18, 19, 20 and Dehydrator units 21a/b, 22a/b, 23a/b and 24a/b.
P168R3M1	12/19/2018	TV Admin Rev	Ownership change from Williams Four Corner to Harvest Four Corner. Operator change from Matt Webre to Kijun Hong.
0968M5R8*	12/19/2018	Administrative Revision	Ownership change from Williams Four Corner to Harvest Four Corner. Operator change from Matt Webre to Kijun Hong.

**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)
0968M5R7*	10/12/2017	Administrative Revision	Administrative revision for like-kind engine replacement for unit 15.
P168R3	01/05/2016	TV Renewal	This TV Renewal incorporates NSR Technical Revision 0968M5R6.
0968M5R6*	12/18/2015	Technical Revision	This Technical Revision incorporates corrections to Table 106.A Allowable Emissions for Glycol Dehydrator Units 5a, 6a, 9a, 10a, 21a, 22a, 23a, and 24a. These units are controlled by installed Dehydrator Still Vent Flare Units 11, 12, 25, and 26. VOC emissions previously associated with the TEG Dehydrator Still Vents/Flash Tanks are now incorporated into the associated flare (Units 11, 12, 25, and 26) emissions in accordance with Condition A202C. Turbine Unit 28 is removed and all related conditions for the micro-turbines are removed due to a combined PTE < 1 pph and 1 tpy. Existing engine Unit 3 failed and is now listed as TBD. <i>Full permit issued, with updated conditions.</i>
0968M5R5	07/20/2015	Administrative Revision	Administrative revision reflecting a like-kind engine replacement for Unit No. 14.
P168R2M3	07/09/2014	Administrative Revision	Administrative revision reflecting a like-kind engine replacement for Unit No. 7. <i>Note: NMED official communication of Administrative Permit Revision P168R2M3 dated 07/09/2014 featured previously assigned Permit Number P168R2M1.</i>
0968M5R4	07/09/2014	Administrative Revision	Administrative revision reflecting a like-kind engine replacement for Unit No. 7.
P168R2M2	04/10/2014	Administrative Revision	Administrative revision to correct and/or provide current serial numbers for various engines and skid packages alongside manufactured dates.
0968M5R3	04/10/2014	Administrative Revision	Administrative revision to correct and/or provide current serial numbers for various engines and skid packages alongside manufactured dates.
P168R2M1	04/03/2013	Significant Modification	Incorporation of NSR Permits 968M4 and 968M5.
0968M5R2	12/06/2012	Technical Revision	Per WFCs request, permitted malfunction emissions were reduced from ten (10) to five (5) tons per year (tpy) of VOCs.
0968M5R1	08/24/2012	Administrative Revision	Administrative revision correcting equipment serial numbers for Units 14 and 15.
0968M5	03/22/2012	Significant Revision	Changes consists of: <ul style="list-style-type: none"> <li>• Correcting construction dates for Waukesha engine Units 7 and 8,</li> <li>• Changing the associated applicability to Subpart JJJJ and ZZZZ, updating of flare emissions, and</li> <li>• Inclusion of emissions (combined CO emissions that exceed 0.5 tons per year) from three 65kW turbines, Units 4, 27, 28.</li> </ul>

**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)
968M4	07/19/2011	Significant Revision	<p>This permit consisted of the following changes:</p> <ul style="list-style-type: none"> <li>• Raising the stack heights and installing catalytic convertors on Units 1, 2, &amp; 3.</li> <li>• Designating the fourth and fifth compressor engines as Waukesha 7042GLs (not Caterpillar G3608 TALEs) and raising the stack heights.</li> <li>• Installation of seven new Waukesha 7042 GL natural gas fired compressor engines</li> <li>• Retiring the permitted but never installed Capstone C-1000 from the permit</li> <li>• Adjusting the stack height, temperature, and diameter based on manufacturer's design drawings of the existing Capstone C-65 microturbine generator</li> <li>• Installation of two new Capstone C-65 microturbine generators</li> <li>• Installation of two new 12 MMscfd glycol dehydrators</li> <li>• Installation of two new 20 MMscfd glycol dehydrators</li> <li>• Updates to the existing flare calculations based on a revised flare stream</li> <li>• Installation of two new flares</li> <li>• HAP emissions for all emissions units was recalculated based on the current version of GRI-HAPCalc</li> <li>• Fugitive emissions were recalculated based on the current version of GRI-HAPCalc</li> <li>• Addition of 10 tpy VOC Malfunction emissions</li> </ul>
P168R2	05/20/2010	TV Renewal	P168R2 Title V renewal, incorporating changes in NSR Permit 0968M3 Technical Revision, as well as two NSR Administrative Revisions.
0968M3R3	10/28/2009	Administrative Revision	This Administrative Revision clarified Unit T-9 as a storage tank for only Triethylene Glycol (TEG). Additional minor substitution of exempt tanks were made. There was no increase of facility emissions.
0968M3R2	09/03/2009	Administrative Revision	Serial numbers for Units 1, 2, and 3 changed.
0968M3R1	07/22/2009	Technical Revision	Redefined routing for dehydrator, correction of engine serial number, clarified SSM emissions.
0968M3	05/28/2009	Significant Revision	Add two compressor engines, add two TEG dehydrators, add two dehydrator flares, add 1000 kW micro turbine generator, increase plant throughput, and add SSM emissions.
P168R1M3	09/20/2006	NSR Name Change	The revision consisted of a name change for the TV permit: Williams Field Services Company to Williams Four Corners, LLC.

**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)
0968M2R5	09/20/2006	NSR Name Change	The revision consisted of a name change for the NSR permit: Williams Field Services Company to Williams Four Corners, LLC.
P168R1M2	06/22/2006	Administrative Revision	This administrative amendment changed the responsible company official.
0968M2R4	10/12/2005	Administrative Revision	Like kind engine replacement was made for two Waukesha 7042GL engines. No changes in emissions.
P168R1M1	04/13/2005	Administrative Revision	This Administrative Amendment consists of waiving the opacity monitoring requirements in condition 3.2.2.1 of the permit due to the use of pipeline quality natural gas at the facility. There are no changes in emissions.
0968M2R3	12/07/2004	Administrative Revision	This administrative revision amended the permit with a complete inventory of the unit package serial numbers for all reciprocating internal combustion engine and turbine, specified by NOV #WIL-1006-0301.
P168R1	10/05/2004	TV Renewal	First TV permit renewal. The TV renewal Allowable Emissions reflected the following reductions from NSR Permit #0968M2R1: 69.3 to 59.1 TPY of NO <sub>x</sub> ; 112.0 to 105.0 TPY of CO, and 45.9 to 45.5 TPY of VOC.
0968M2R2	01/30/2002	Administrative Revision	Revision consisted of replacing and retiring a Kohler 100 RZ62 electrical generator and installing a Capstone C60 Turbine.
0968M2R1	09/05/2001	Administrative Revision	Revision consisted of identical replacement of a Waukesha 7042GL. Although this action has virtually the same permit number as the NSR issuance dated 1/30/1996, the actions are totally different.
P168	08/27/1997	TV Permit Issuance	Initial TV Permit issuance.
0968M2R1	01/30/1996	NSR Modification	M2 was a modification of equipment and emissions. Permit revision authorizes operation of 3 Waukesha 7042 GL engines (derated at 1378 hp), 1 Kohler 100 RZ62 electrical generator, and 2 glycol dehydrators. Permit removes the 679.6 hp and 990 hp Waukesha GL engines. The emissions were reduced: 73.3 to 69.3 TPY of NO <sub>x</sub> , 119.0 to 112.0 TPY of CO, and 51.4 to 45.9 TPY of VOCs.
0968M2	10/29/1993	NSR Modification	One Waukesha 7042 GL 679.6 derated hp engine was removed; one Kohler 100RZ62 engine generator was added. After modification, the facility was authorized to operate 5 Waukesha 7042 GL engines and 1 Kohler engine generator.
0968M1	12/02/1992	NSR Modification	Permit modification to add 4 Waukesha 7042 GL engines derated at 990 hp.
0968	09/13/1991	NPR	Issuance of NPR for original installation of 2 Waukesha 7042 GL compressor engines de-rated at 679.6 hp.

**6.0 Public Response/Concerns:** As of the current date of this permit, this permit writer is

not aware of any public comment or concern.

**7.0 Compliance Testing:**

<b>Unit No.</b>	<b>Compliance Test</b>	<b>Test Dates</b>
1	Portable analyzer testing of NOX and CO	08/29/2019
2	Portable analyzer testing of NOX and CO	08/07/2019
3	Not installed	Not installed
7	Portable analyzer testing of NOX and CO	08/07/2019
8	Portable analyzer testing of NOX and CO	08/13/2013
14	Portable analyzer testing of NOX and CO	08/08/2019
15	Portable analyzer testing of NOX and CO	80/08/2019
16	Not installed	Not installed
17	Not installed	Not installed
18	Not installed	Not installed
19	Not installed	Not installed
20	Not installed	Not installed

**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:**

According to enforcement manger Shannon Duran on January 23, 2020: “There are currently no ongoing NOVs or Settlement Agreements for this facility with Enforcement.”

**10.0 Modeling:**

This is a Title V renewal application and does not require modeling. Modeling was last completed by Gi-Dong Kim for NSR 968M4, issued July 11, 2011. Conclusions from the 2011 modeling report state that “operation of the facility neither causes nor contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for NO2 and CO; NMAAQs for NO2 and CO; and PSD Class I and II for NO2.”

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

<a href="#">STATE REGULATIONS</a> 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 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, Not for TV actions		20.2.3.9 NMAC, LIMITATION OF APPLICABILITY TO 20.2.70 NMAC. The requirements of NMAAQs are not applicable requirements under 20.2.70 NMAC, as defined by 20.2.3.9 NMAC, 20.2.3.9 NMAC does not limit the applicability of this part to sources required to obtain a permit under the minor NSR regulation, 20.2.72 NMAC, nor does it limit which terms and conditions of NSR permits issued pursuant to 20.2.72 NMAC are applicable requirements in a Title V permit.
2.7	Excess Emissions	Yes, Always	Entire Facility	Applies to all facilities' sources
2.35	Natural Gas Processing Plant – Sulfur	No		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.  <b>This facility is not a natural gas processing facility.</b>
2.38	Hydrocarbon Storage Facilities	No		<a href="#">20.2.38</a> NMAC This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities.  This regulation is not applicable because the facility will not be equipped with a tank battery storing hydrocarbon liquids (condensate) that will have a capacity greater than or equal to 65,000 gallons.
2.61	Smoke and Visible Emissions	Yes	1, 2, 3, 7, 8, 11, 12, 14, 15, 16, 5b, 6b, 9b, 10b,	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC). <b>If equipment at your facility was subject to the repealed regulation 20.2.37 NMAC it is now subject to 20.2.61 NMAC.</b>
2.70	Operating Permits	Yes	Entire Facility	The source is a Title V Major Source as defined at 20.2.70.7 NMAC.
2.71	Operating Permit Fees	Yes	Entire Facility	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Yes	Entire Facility	This regulation is applicable because the facility has potential emission rates (PER) greater than 10 pph or 25 tpy for pollutants subject to a state or federal ambient air quality standards (does not include VOCs or HAPs).

<a href="#">STATE REGULATIONS</a> CITATION 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	JUSTIFICATION:
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	No	Entire Facility	This regulation is not applicable because the facility is not currently a PSD major source and the emissions increase associated with this modification is not significant.
2.75	Construction Permit Fees	No	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	Yes (Potentially)	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	See Sources subject to 40 CFR 61	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61.
2.79	Permits – Nonattainment Areas	No		This facility is not located in, not does it affect, a nonattainment area. Link to <a href="#">Non-attainment Link</a> areas
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 (40 CFR 50)	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.
NSPS Subpart A (40 CFR 60)	General Provisions	Yes (Potentially)	See sources subject to a Subpart in 40 CFR 60	Applies if any other subpart applies.
40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No		This regulation is not applicable because the facility is not equipped with turbines constructed after the applicability date of October 3, 1977 and having heat inputs at peak load greater than 10.15 MMBtu/hr.
40 CFR 60, Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	No		This regulation is not applicable because the facility is not a natural gas processing plant as defined by the subpart.



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	Yes (Potentially)	3, 16	<p>The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of section 60.4230. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.</p> <p>The existing engines (Units 1, 2, 7, 8, 14, and 15) were constructed prior to June 13, 2006. The engines have not undergone “modifications” or “reconstructions.”</p> <p>Units 3 &amp; 16 are not installed. If and when they are installed, the applicability of Subpart JJJJ will be evaluated at that time.</p> <p><a href="#">Link to regulation – read more</a></p>
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 (Potentially)	3, 16	<p>The rule applies to “affected” facilities that are constructed, modified, or reconstructed after Aug 23, 2011 and on or before September 18, 2015 (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>The units installed at the facility were constructed, modified or reconstructed before 2011. The units 3 and 16 are not installed and might be subject to this regulation depending on their history ,but more likely subject to OOOOa (see below).</p>
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 (Potentially)	3, 16	<p>The rule applies to “affected” facilities that are constructed, modified, or reconstructed after September 18, 2015 (40 CFR 60.5365a): 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>The units 3 and 16 are not installed and are potentially subject to this regulation when installed.</p>
NESHAP Subpart A (40 CFR 61)	General Provisions	No	See sources subject to a	Applies if any other subpart applies.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
			Subpart in 40 CFR 61	
MACT Subpart A (40 CFR 63)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 63	Applies if any other subpart applies.
MACT 40 CFR 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants For Oil and Natural Gas Production Facilities	Yes, and Potentially	5a, 6a, 9a & 10a (Yes)	<p>This regulation is applicable because the facility is equipped with dehydrators. The station is an area HAP source and the dehydrators will have to comply with the area source requirements of the subpart. It is currently anticipated the dehydrators will continue to qualify for the benzene exemption under §63.764(e)(1)(ii).</p> <p>The station does not contain storage vessels with the potential for flashing losses or compressors or ancillary equipment in volatile HAP service as defined by the subpart, thus these portions of the regulation are not applicable.</p> <p>The dehydrators will comply with the applicable portions of the subpart.</p>
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes, and Potentially	1, 2, 7, 8, 14 & 15 (Yes)  3, 16(Potentially)	<p>A facility is subject to this subpart if they own or operate a stationary RICE at a major, except if the stationary RICE is being tested at a stationary RICE test cell/stand.</p> <p>In accordance with the provisions of §63.6603(a), Units 1, 2, 7, 8, 14 and 15 are non-emergency, non-black start, 4-stroke, lean burn (4SLB) engines, site-rated &gt; 500 bhp, and located at a remote facility. They must comply with the maintenance and operating standards in Table 2d, row #8, including oil and filter changes and inspections of spark plugs, hoses and belts every 2,160 hours of operating time or annually, whichever comes first. Engine startup and idle times must be minimized in accordance with the regulation.</p> <p>Units 3 &amp; 16 are not yet installed. If and when the units are installed at the facility, the applicability of Subpart ZZZZ to these units will be evaluated at that time. The engines will comply with the applicable portions of the subpart.</p>
40 CFR 64	Compliance Assurance Monitoring	No		The uncontrolled emissions for this unit are not above the Title V major source thresholds.

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

**Title V - INSIGNIFICANT ACTIVITIES** (Dated March 24, 2005) as defined by 20.2.70.7.Q NMAC:

Unit Number	Source Description	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)
		Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)
T1	Produced Water	6500	Items # 1.a & 1.b
		Gallons	
T2	Wastewater	6300	Items # 1.a & 1.b
		Gallons	
T3	Used Oil	6930	Items # 1.a, 1.b & 5
		Gallons	
T4	Lube Oil	4200	Items # 1.a, 1.b & 5
		Gallons	
T5, T6, T9, T10 & T41-T44	Triethylene Glycol (TEG)	500	Items # 1.a, 1.b & 5
		Gallons (each)	
T7 & T49	Antifreeze	500	Items # 1.a, 1.b & 5
		Gallons (each)	
T8	Corrosion Inhibitor	800	Items # 1.a, 1.b & 5
		Gallons	
T11-T13 & T17-T25	Lube Oil	500	Items # 1.a, 1.b & 5
		Gallons (each)	
T14 & T15	Produced Water	12600	Items # 1.a & 1.b
		Gallons (each)	
T16	Wastewater	6930	Items # 1.a & 1.b
		Gallons	
T29 - T36	Triethylene Glycol (TEG)	100	Items # 1.a, 1.b & 5
		Gallons (each)	
F-1	Fugitive Emissions	-	Items # 1.a & 1.b
		-	

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

- A. Table 104.A Updated for removed/retired equipment and some updates of serial numbers and manufacture-construction dates.

- B. Table 106.A Included dehydrator and reboiler units.
- C. Condition A201.G Engine Maintenance and Repair removed because these all have controls and control devices are monitored.
- D. A204.A, Operational Inspections of Heaters.
- E. New Conditions A206.C Flare Gas Flow Monitoring and Gas Analysis; and A206.D Flare Emissions Calculation.

**15.0 For Title V action: Cross Reference Table between NSR Permit 0968M5R6 and TV Permit P168R4. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:**

<b>Changed by TV*</b>	<b>NSR 0968M5R6 Condition #</b>	<b>TV P168R4 Section #</b>
	A100 Introduction	A100 Introduction
	A101 Permit Duration	A101 Permit Duration
	A102 Facility Description	A102 Facility Description
	Table 102.A Total Potential Emissions	Table 102.A Total Potential Emissions
	A103 Facility: Applicable Regulations	A103 Facility: Applicable Regulations
	A104 Facility: Regulated Sources	A104 Facility: Regulated Sources
	A105 Facility: Control Equipment	A105 Facility: Control Equipment
	A106 Facility: Allowable Emissions	A106 Facility: Allowable Emissions
	A107 Facility: Allowable SSM	A107 Facility: Allowable SSM
	A107.C SSM	A107.C SSM
	A107.D Malfunction	A107.D Malfunction
	A108 Facility: Hours of Operations	A108 Facility: Hours of Operations
	A109 Facility: Reporting Schedules NR for NSR	A109 Facility: Reporting Schedules
	TV Unique	A109.A TV Semi-Annual
	TV Unique	A109.B TV ACC
	TV Unique	A109.C TV Quarterly Reporting
	A110 Facility: Fuel Sulfur Requirements	A110 Facility: Fuel Sulfur Requirements
	A111 Facility: 20.2.61 NMAC Opacity	A111 Facility: 20.2.61 NMAC Opacity
	A200 Oil and Gas Industry	A200 Oil and Gas Industry
	A201 Engines	A201 Engines
	A201.A: Initial Compliance (Units 3 & 16)	A201.A: Initial Compliance (Units 3 & 16 - 20)
	A201.B: Periodic Testing (Units 1-2, 7, 8, and 14-15; TBD Units 3 & 16, after installation)	A201.B: Periodic Testing (Units 1-2, 7, 8, and 14-15; TBD Units 3 & 16 – 20, after installation)
	A201.C: Catalytic Converter Operation (Units 1-2, 7, 8, and 14-15; TBD Units 3 & 16)	A201.C: Catalytic Converter Operation (Units 1-2, 7, 8, and 14-15; TBD Units 3 & 16 - 20)
	A201.D: 40 CFR 60, Subpart JJJJ (Units 3 & 16)	A201.D: 40 CFR 60, Subpart JJJJ (Units 3 & 16 - 20)
	A201.E: 40 CFR 63, Subpart ZZZZ (Units	A201.E: 40 CFR 63, Subpart ZZZZ (Units 1-

<b>Changed by TV*</b>	<b>NSR 0968M5R6 Condition #</b>	<b>TV P168R4 Section #</b>
	1-2, 7, 8, and 14-15)	2, 7, 8, and 14-15)
	A201.F: 40 CFR 63, Subpart ZZZZ (Units 3 & 16)	A201.F: 40 CFR 63, Subpart ZZZZ (Units 3 & 16 - 20)
Removed from TV	A201.G: Maintenance and Repair Monitoring (Units 1-2, 7, 8, and 14-15; TBD Units 3, 16)	A201.G: Maintenance and Repair Monitoring (Units 1-2, 7, 8, and 14-15; TBD Units 3, 16 - 20)
	A202 Glycol Dehydrators	A202 Glycol Dehydrators
	A202.A: Extended Gas Analysis and GRI-GLYCalc Calculation (Units 5, 6, 9, and 10)	A202.A: Extended Gas Analysis and GRI-GLYCalc Calculation (Units 5, 6, 9, and 10; TBD 21 – 24)
	A202.B: Glycol pump circulation rate (Units 5, 6, 9, and 10)	A202.B: Glycol pump circulation rate (Units 5, 6, 9, and 10; TBD 21 – 24)
	A202.C: Control Device Inspection (Units 5, 6, 9, and 10)	A202.C: Control Device Inspection (Units 5, 6, 9, and 10; TBD 21 – 24)
	A202.D: 40 CFR 63, Subpart HH (Units 5, 6, 9, and 10)	A202.D: 40 CFR 63, Subpart HH (Units 5, 6, 9, and 10; TBD 21 – 24)
	A205 Turbines (Not Required)	A205 Turbines (Not Required)
	A206 Flares	A206 Flares
	A206.A Flare Flame & Visible Emissions (20.2.61 NMAC) (Units 11 and 12)	A206.A Flare Flame & Visible Emissions (20.2.61 NMAC) (Units 11 and 12; TBD Units 25 and 26)
	A206.B Flare Emissions (Units 11 and 12)	A206.B Flare Emissions (Units 11 and 12; TBD Units 25 and 26)
Added to the TV	A206.C Flare Gas Flow Monitoring and Gas Analysis (Units 11 and 12)	A206.C Flare Gas Flow Monitoring and Gas Analysis (Units 11 and 12; TBD Units 25 and 26)
Added to the TV	A206.D Flare Emissions Calculation (Units 11 and 12)	A206.D Flare Emissions Calculation (Units 11 and 12; TBD Units 25 and 26)
Updated EPA address.	Part B General Conditions	Part B General Conditions, <b>entire Section updated</b>

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

- A. This is a renewal of the Title V permit from Permit no.: P168R3
- B. Removed condition A201.G Maintenance and Repair because all the engines have controls and the condition does not apply according to the monitoring protocol.