Draft - Statement of Basis - Narrative
Title V Permit

Type of Permit Action: TV-Renewal and Significant Modification

Facility: Harvest - Chaco Compressor Station
Company: Harvest Four Corners LLC
Permit No(s).: 0759-M6R1 and P236-R3
Tempo/IDEA ID No.: 1189 - PRT20190002
Permit Writer: Urshula Bajracharya

Fee Tracking (not required for Title V)

Tracking	**NSR tracking entries completed:** [] Yes [] No
	NSR tracking page attached to front cover of permit folder: [] Yes [] No
	Paid Invoice Attached: [] Yes [] No
	Balance Due Invoice Attached: [] Yes [] No
	Invoice Comments:

Permit Review	**Date to Enforcement:** N/A	**Date of Enforcement Reply:** N/A
	Date to Applicant: 02/16/2021	**Date of Applicant Reply:** TBD
	Date to EPA: TBD or N/A	**Date of EPA Reply:** TBD or N/A
	Date to Supervisor: 04/28/2020, 02/15/2021	

1.0 Plant Process Description:

The Chaco Compressor Station compresses pipeline natural gas for transmission. The facility will be permitted for the operation of four natural gas-fired turbines (all driving compressors), one standby generator, one pig receiver, truck loading, equipment leaks, two condensate storage tanks, and two produced water storage tanks. Other sources at the facility include heaters and miscellaneous storage tanks. The storage tanks are used to store oil, used oil, condensate, produced water, and methanol. A separator and EVRU reduce emissions from the condensate storage tanks at the station. An alternate operating scenario in the permit allows for increased throughput when the EVRU is replaced by a more efficient VRU.

2.0 Description of this Modification:

This is a Title V Permit Renewal and Significant Modification. This application was submitted to update the Title V operating permit with the changes that were approved in the NSR permit no. 0759-M6. The changes included in the NSR construction permit are:

- Increase the permitted annual throughput and emissions limits for the condensate storage tanks (Units T4 & T5);
- Increase the permitted annual throughput and emissions limits for condensate truck loading (Unit L1);
- Add one existing pig receiver (Unit PR), an exempt source;

- Identify SSM emissions as Unit "SSM", rather than Unit "1a-4a"; and
- Increase SSM emissions (Unit SSM) to allow for a richer gas stream.
- Alternative operating scenario is requested which will allow the facility to increase the throughput from 45,000 bbl/yr to 60,000 bbl/yr only under the condition that vapor recovery system (VRU) is installed and operational.

3.0 Source Determination:

1. The emission sources evaluated include the entire 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)
P236-R3*	05/26/2021	Title V-Renewal and Significant Modification	This is a Title V permit renewal and significant modification which incorporates changes from the NSR permit 0759-M6. The facility is increasing the annual throughput and emission limits for the condensate storage tanks (Unit T4 and T5) and condensate truck loading (Unit L1). The facility is also replacing unit 1a-4a with SSM emissions and increasing the SSM emission (Unit SSM) to allow for richer gas stream. Alternative operating scenario is requested to allow for increase in throughput from 45,000 bbl/yr to 60,000 bbl/yr if VRU is installed and operational.

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)
0759-M6R1	10/25/2018	Administrative Revision	Change in ownership.
0759-M6	10/12/16	Significant Revision	This modification consists of increasing the permitted annual throughput and emissions for condensate storage tanks and condensate truck loading, and increasing startup, shutdown, and maintenance (SSM) emissions based on a richer gas stream. Annual condensate throughput is permitted at 45,000 bbl/yr and at 60,000 bbl/yr with installation of a vapor recovery system under an alternative operating scenario (AOS).
P236R2	8/19/2016	Renewal	Title V Renewal, no significant changes from P236R1M2.
P236R1M2	5/9/2016	Significant Modification	This TV significant modification incorporates NSR 0759M5 and 0759M5R1 revisions as described.

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)
0759M5R1	3/9/2016	Technical Revision	Technical Revision to meet the requirements of Settlement Agreement AQCA 09-00 (CO) dated May 18, 2010, Item 16 Environmental Projects and Item 64 Integration in Permits. New Condition A203.B establishes monitoring requirements for the Ejector Vapor Recovery Unit (EVRU) installed to control emissions from condensate storage tanks, per the Settlement Agreement Environmental Project requirements. In addition, this technical revision incorporates revision of Condition A203.A to be consistent with the requirements in the recently issued NSR permit for the Kutz Gas Plant, NSR 0301-M9. A new condition is added for produced water tanks T-6 and T-12. Allowable emissions have been updated to reflect the change in calculated emissions for T-6 and T-12 (+ 0.5 tpy) due to updated emission factors. The applicability determination listed for 40 CFR 63, Subpart YYYY in P236-R1M1 and 0759-M5, Table 103.A Applicable Requirements has been reviewed and determined to be incorrect. All references to this regulation have been removed.
0759M5	7/23/2014	Significant Revision	PSD Minor After this Action. The proposed significant permit revision includes: reducing condensate tank emissions using a 3-phase separator and ejector vapor recovery unit, modifying condensate monitoring requirements, updating turbine data, identifying the emergency generator as an exempt source, increasing startup, shutdown and maintenance emissions, adding existing equipment leaks emissions, adding existing truck loading emissions, increasing emissions from a produced water tank, adding a produced water tank, adding an exempt heater, and modifying turbine monitoring requirements.

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)
P236R1M1	9/7/2012	Administrative Amendment	This Administrative permit amendment in accordance with 20.2.70.404.A(1)(e) NMAC consists of replacing the General Conditions, Part B of this permit with more current and valid conditions. There are no physical changes to the facility, or changes in emissions, or changes to Specific Conditions for monitoring, recordkeeping and reporting.
NA	2/23/2012	RO Change	Don Wicburg, General Manager of the Four Corners Area, will become the Responsible Official. Eric Edmanson, Manager Operations in Four Corners Area, is now the Alternate Responsible Official.
0759M4R1	5/30/2012	Administrative Revision	This revision consists of permitting a source exempt under 20.2.72.202.B(5) NMAC. The Unit VRU-Heater, is a natural gas fired heater for 3-phase separator on VRU, with capacity of 0.51 MMBtu/hr, model # SB20-14, serial # 1110-67 A. The unit also qualifies as an insignificant activity per 20.2.70.302.D(6) and shall be added to the next Title V application.
P236R1	12/05/11	Title V Renewal	There are no significant changes from the current operating permit and the following are incorporated into this permit: Routine Startup, Shutdown and Maintenance blow down emissions of volatile organic compounds (VOC) from the compressors and associated piping (Units 1a-4a); emissions of sulfur dioxide (SO2) and particulate matter for permitted combustion equipment (Units 1-4); existing emissions from condensate truck loading; change the capacity of Used Oil Storage Tank (T-2) from 1000 gal to 840 gal; and remove Methanol Storage Tank (T-9).

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)
0759M4	10/17/11	Significant Revision	SSM: In accordance with 20.2.7.15 NMAC, applying to permit emissions exceeding an emission limitation due to routine and predictable startup, shutdown, and maintenance (SSM). For this facility SSM emissions include venting natural gas from compressors (units 1a through 4a) and associated piping resulting in emissions of 368 pph and 19.3 tons per year of VOCs and small quantities of HAPs. Malfunction: Applying for a maximum of 10 tpy of VOC emissions from venting caused by malfunctions as defined in 20.2.7.7.E NMAC. This request is in accordance with AQB's guidance Implementation Guidance for Permitting SSM Emissions and Excess Emissions dated January 1, 2011.
AQCA-09-00(CO)	5/18/2010	Settlement Agreement	Supplemental environmental project to Settlement Agreement AQCA-09-00(CO) required installation of Vapor Recovery Units (VRUs) at both the Chaco Compressor Station and the Blanco/Hare Compressor Station for an estimated total VOC emissions reduction of 422 tons per year.
NA	3/1/2010	RO Change	Allen Johnson new RO, Don Wicburg, FCA Area General Manager, is new Alternate RO. Don's title changed also.
0759M3R2 P236M2	8/22/2006 9/20/2006	Administrative Amendment	Owner Name Change from Williams Fields Services Company to Williams Four Corners, LLC.
P236M1	6/26/2006	Administrative Amendment	Don Wicburg, Director, Four Corners Area assigned as RO.
P236	4/27//2006	Title V (new)	Includes all NSR actions resulting from modifications.
0759M3R1	11/16/2004	Administrative Amendment	Part of a permitting action to update the serial numbers of Williams Equipment in all facilities.

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)
0759M3	8/31/2004	Significant Revision	Set limits on condensate tanks and increased emission on the engines, giving the facility major status. Title V application received 10/20/05.
0759M2	4/22/1994	Significant Revision	Added an emergency standby generator
0759M1	10/13/1992	Significant Revision	Added two more engines, Units 003 and 004
0759	4/9/1990	NSR	Permitted two Solar Engines, Units 001 and 002

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

7.0 Compliance Testing:

Unit No.	Test Description	Test Date
1	NOX and CO testing with a portable analyzer.	6/26/2018
2	NOX and CO testing with a portable analyzer.	6/26/2018
3	NOX and CO testing with a portable analyzer.	6/4/2015
4	NOX and CO testing with a portable analyzer.	6/26/2018

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:

Per email from Shannon Duran on 11/15/2019: "Enforcement currently has no outstanding NOVs or SAs for the facility."

10.0 Modeling:

This is a Title V application; therefore, modeling is not required. Modeling was last completed by Gi-Dong Kim for this facility during NSR modification 0759-M3. Per the Modeling Summary Report dated August 30, 2004, "operation of the facility described in

this report neither causes not significantly contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for CO and NO_2; NMAAQS for CO and NO_2; and Class II PSD increments for NO_2." Modeling waiver was approved for Application 0759-M6 which incorporated a change in VOC and HAP emissions only and thus, there were no changes to the facility air dispersion modeling. Modeling waiver was also approved for NSR Permit 0759-M5 by Gi-Dong Kim on April 4, 2014.

11.0 State Regulatory Analysis (NMAC/AQCR):

STATE REGU-LATIONS CITATION 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	JUSTIFICATION:
2.1	GENERAL PROVISIONS	Yes	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	No for TV	Entire Facility	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	Entire Facility	Applies to all facilities' sources
2.61	Smoke and Visible Emissions	Yes	Units 1, 2, 3, 4, 5	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). **If equipment at your facility was subject to the repealed regulation 20.2.37 NMAC it is now subject to 20.2.61 NMAC.**
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).
2.73	NOI & Emissions Inventory Requirements	Yes	Entire Facility	Applicable to all facilities that require a permit. PER **>** 10 tpy for a regulated air contaminant.

STATE REGU-LATIONS CITATION 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	JUSTIFICATION:
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		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	Unit 4	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60, Subparts A and GG.
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.
2.82	MACT Standards for Source Categories of HAPs	Yes	Unit 5	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63, Subparts A and ZZZZ.

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	Unit 4	Applies if any other subpart applies. This unit is subject to Subpart GG.
40 CFR 60.330 Subpart GG	Stationary Gas Turbines	Yes	Unit 4	This regulation is applicable because one the turbines at the facility, Unit 4, has a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour and commenced construction after October 3, 1977. This regulation is not applicable to Units 1-3, as they were constructed prior to the applicability date. Unit 4 must comply with the NO_X emission limitation of 150 ppmv at 15% O_2 on a dry basis. The units must comply with the SO_2 emissions limitation of 0.015% by volume at 15% O_2 on a dry basis or use a fuel that does not contain sulfur in excess of 0.8 percent by weight (8,000 ppmw).
40 CFR 60,	Standards of Performance	No		This is not a natural Gas Processing Plant.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Subpart KKK	for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants			
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark. Ignition Internal Combustion Engines	No		There are no stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of section 60.4230.
40 CFR Part 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines	No		The existing combustion turbines were installed on before the applicability date of February 18, 2005.
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	No		This regulation does not apply because the facility will not be equipped with "affected" sources that are constructed, modified, or reconstructed after Aug 23, 2011 and on or before September 18, 2015: gas wells, centrifugal or reciprocating compressors, pneumatic controllers, and storage vessels (see §60.5365). Note that the facility is not a natural gas processing plant as defined by the subpart (see §60.5430).
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	VRU-AOS (Potentially)	This regulation does not apply because the facility will not be equipped with "affected" sources that are constructed, modified, or reconstructed after September 18, 2015: gas wells, centrifugal or reciprocating compressors, pneumatic controllers, storage vessels, pneumatic pumps, and equipment leaks (see §60.5365a). Note that the facility is not a natural gas processing plant as defined by the subpart (see §60.5430a). The VRU-AOS may be regulated under OOOOa when installed.
NESHAP Subpart A (40 CFR 61)	General Provisions	No		This regulation does not apply, because none of the other 40 CFR Part 61 subparts apply (see §61.1(c)).
MACT Subpart A (40 CFR 63)	General Provisions	Yes	Unit 5	Applies if any other subpart applies. The Unit 5 is subject to Subpart ZZZZ (see §63.1(b)).
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	No		The facility is not a production facility
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	Unit 5	See 63.6580 and EPA Region 1's Reciprocating Internal Combustion Guidance website. A facility is subject to this subpart if they own or operate a stationary RICE at an area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand. The engine is an existing (constructed or reconstructed before June 12, 2006) emergency stationary RICE as defined by the subpart. It must

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				meet the following requirements: a. Change oil and filter every 500 hours of operation or annually, whichever comes first; b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
40 CFR 64	Compliance Assurance Monitoring	No		This regulation is not applicable because there are no sources at the station using control devices to achieve compliance with emission limits where pre control emissions equal or exceed the major source threshold (100 tons per year). Note that the EVRU is not a control device as defined by the part. The installed EVRU system is classified as inherent process equipment and does not meet the definition of a control device under this part (§64.1 Definitions).
40 CFR 70	Title V- State Operating Permit Programs	No		Operating Permit Program – is not applicable – New Mexico State has full delegated authority and Title V is administered under 20.2.70 NMAC.

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	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	Insignificant Activity citation (e.g. IA List Item #1.a)
6	EVRU Separator Heater		SB20-14	0.51	20.2.72.202.B.5
			1110-67 A	MMBtu/hr	#1a &#1b
7	Fuel Gas Heater			0.005	20.2.72.202.B.5
				MMBtu/hr	#1a &#1b
L2	Truck Loading (Produced Water)				20.2.72.202.B.5
					#1a &#1b
PR	Pig Receiver				20.2.72.202.B.5
					#1a &#1b
T1	Lubrication Oil Storage Tank			1000	20.2.72.202.B.2
				gal	#1a,#1b&#5
T2	Used Oil Storage Tank			840	20.2.72.202.B.2
				gal	#1a,#1b&#5
T3	Diesel Storage Tank			160	20.2.72.202.B.2
				gal	#1a,#1b&#5
T7	Methanol Storage Tank			500	20.2.72.202.B.5
				gal	#1a &#1b
T8	Methanol Storage Tank			300	20.2.72.202.B.5
				gal	#1a,#1b&#5
T10	Methanol Storage Tank			125	20.2.72.202.B.5
				gal	#1a,#1b&#5
T11	Methanol Storage Tank			65	20.2.72.202.B.5
				gal	#1a,#1b&#5

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

A. Modified 1: Condition A110.A: Updated Fuel and Fuel Sulfur Requirement - Recordkeeping section of the condition to match the most current template.

B. New 1: Condition A110.B: Added Fuel and Fuel Sulfur Requirement for Diesel fuels for Unit

5.

C. Modified 2: Condition A111.B: Updated Opacity Requirement condition for Unit 5 (Diesel Engine) to the most current template.

D. New 2: Condition A206.C: Added Maintenance and Repair Monitoring for turbines that did not have control equipment.

15.0 For Title V action: Cross Reference Table between NSR Permit 0759-M6 and TV Permit P236-R3. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:

Changed by TV*	NSR Condition # 0759-M6	TV Section # P236-M3
	A100 Introduction	A100 Introduction
X	A101 Permit Duration	A101 Permit Duration
	A102 Facility Description	A102 Facility Description
X	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.C Facility: Allowable SSM	A107.C SSM VOC Emissions for venting of gas
	A107.D Malfunction Emissions	A107.D Malfunction Emissions
	A108 Facility: Hours of Operations	A108 Facility: Hours of Operations
X	A109 Facility: Reporting Schedules NR for NSR	A109 Facility: Reporting Schedules
	A110 Facility: Fuel Sulfur Requirements	A110.A Facility: Fuel Sulfur Requirements (Units 1, 2, 3 and 4)
X		A110.B Facility: Fuel Sulfur Requirements (Diesel Fuel) (Unit 5)
	A111.A Facility: 20.2.61 NMAC Opacity Requirements (Units 1, 2, 3 and 4)	A111.A Facility: 20.2.61 NMAC Opacity Requirements (Units 1, 2, 3 and 4)
X	A111.A Facility: 20.2.61 NMAC Opacity Requirements (Unit 5)	A111.A Facility: 20.2.61 NMAC Opacity Requirements (Unit 5)
	A112 Facility: Alternative Operating Scenario	
	A201.A Engines: 40 CFR 63, Subpart ZZZZ (Unit 5)	A201.A Engines: 40 CFR 63, Subpart ZZZZ (Unit 5)
	A201.B Engines: Hours of Operation (Unit 5)	A201.B Hours of Operation (Unit 5)
	A202 Glycol Dehydrator – Not required	A202 Glycol Dehydrator – Not required
	A203.A Tanks: Alternative Operating	A203.A Tanks: Alternative Operating

Changed by TV*	NSR Condition # 0759-M6	TV Section # P236-M3
	Scenario	Scenario
	A203.B Tanks: Tank Operation (Unit T4 and T5)	A203.B Tanks: Tank Operation (Unit T4 and T5)
	A203.C Tanks: Tank EVRU Operations (Units T4 & T5)	A203.C Tanks: Tank EVRU Operations (Units T4 & T5)
	A203.D Tanks: Tank Throughput (Units T-6 and T-12) [without flash emissions]	A203.D Tanks: Tank Throughput (Units T-6 and T-12) [without flash emissions]
	A203.E Tanks: Truck Loading - Condensate Loadout (Unit L1)	A203.E Tanks: Truck Loading - Condensate Loadout (Unit L1)
	A204.A Tanks and VRU-AOS: Tank Operations (Units T4 AOS & T5 AOS) [with flash emissions]	A204.A Tanks and VRU-AOS: Tank Operations (Units T4 AOS & T5 AOS) [with flash emissions]
	A204.B Tanks and VRU-AOS: Tank VRU AOS Operations (Units T4 AOS/T5 AOS and control device)	A204.B Tanks and VRU-AOS: Tank VRU AOS Operations (Units T4 AOS/T5 AOS and control device)
	A204.C Tanks and VRU-AOS: Tank Throughput (Units T-6 AOS and T-12 AOS) [without flash emissions]	A204.C Tanks and VRU-AOS: Tank Throughput (Units T-6 AOS and T-12 AOS) [without flash emissions]
	A204.D Tanks and VRU-AOS: Truck Loading - Condensate Loadout (Unit L1 AOS)	A204.D Tanks and VRU-AOS: Truck Loading - Condensate Loadout (Unit L1 AOS)
	A204.E Tanks and VRU-AOS: 40 CFR 60, Subpart OOOOa (Potentially Unit VRU-AOS)	A204.E Tanks and VRU-AOS: 40 CFR 60, Subpart OOOOa (Potentially Unit VRU-AOS)
	A205. A Turbines: Periodic Emissions Tests (Units 1, 2, 3, and 4)	A206. A Turbines: Periodic Emissions Tests (Units 1, 2, 3, and 4)
	A205. B Turbines: 40 CFR 60, Subpart GG (Unit 4)	A206. B Turbines: 40 CFR 60, Subpart GG (Unit 4)
X		A206. C Turbines: Maintenance and Repair Monitoring (Units 1, 2, 3, and 4)
X	Part B General Conditions	Part B General Conditions, **entire Section updated**

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

A. The facility has requested Alternative operating scenario (AOS) which will allow them to increase the throughput from 45,000 bbl/yr to 60,000 bbl/yr only if the VRU is installed and operational.

B. This permit incorporated changes from NSR permit 0759-M6.