DRAFT as of August 22, 2022

Statement of Basis - Narrative
NSR Permit

Type of Permit Action: Regular-New

Facility: Black River Gas Processing Plant
Company: DLK Black River Midstream, LLC
Permit No(s).: 6567-M8
Tempo/IDEA ID No.: 36133 - PRN20210001
Permit Writer: Julia Kuhn

Fee Tracking

Tracking	**NSR tracking entries completed:** [X] Yes [] No
	NSR tracking page attached to front cover of permit folder: [] Yes [] No NA
	Paid Invoice Attached: [X] Yes [] No
	Balance Due Invoice Attached: [] Yes [] No NA
	Invoice Comments: $27,648.00 paid in full on 7/6/2021

Permit Review	**Date to Enforcement:** TBD	**Date of Enforcement Reply:** TBD
	Date to Applicant: 9/8/2021, 1/21/2022	**Date of Applicant Reply:** 9/24/2021, 11/5/2021
	Date to EPA: NA	**Date of EPA Reply:** NA
	Date to Supervisor: 06/22/2021, 7/28/2021, 9/2/2021, 9/8/2021, 11/9/2021	

1.0 Plant Process Description:

The Black River Gas Processing Plant is an existing natural gas processing plant located in Eddy County. The primary function of the plant is to remove CO2, water and natural gas liquids from sweet field gas so that the gas can meet pipeline specifications. The plant has been designated a primary Standard Industrial Classification (SIC) Code of 1321.

The plant has the capability to receive both low-pressure and high-pressure deliveries. The field gas flows through inlet slug catchers. The condensate collected in the slug catchers is routed to accumulators, stabilized, then collected in condensate storage tanks (TK-702A-TK-702F). The stabilizers are located in Plant 1 and Plant 3, and they are heated by natural gas fired hot oil heaters (HT-801, HT-802, and HT-803). The produced water from the accumulators is routed to a produced water storage tank (TK-701). The condensate and produced water leave the facility through a lease automatic custody transfer unit and water pipeline, respectively.

The low-pressure gas is compressed at the inlet of the facility by four gas engine driven compressors (ENG 1-ENG-4) and five electric driven compressors. This compressed gas is combined with the high-pressure field gas and distributed to plants 1, 2, and 3. Plants 1 and 2 share a common amine unit (AM-1) and a common glycol dehydration unit (DEHY-1). Plant 3

has a dedicated amine unit (AM-2) and a dedicated glycol dehydration unit (DEHY-2). The amine hot oil heaters (AR-1, AR-2) are natural gas fired heaters that provide heat to the amine units (AM-1, AM-2). The glycol dehydration units (DEHY-1, DEHY-2) are heated by a direct fired reboilers (DR-1, DR-2). Acid gas from the plant 1 and 2 amine unit (AM-1) is routed to the thermal oxidizer in Plant 2 (TO-1). Acid gas from the plant 3 amine unit (AM-2) is routed to the thermal oxidizer in Plant 3 (TO-2).

The Plant 1 and 2 glycol dehydration unit (Dehy-1) regenerator stream is routed to the plant 2 flare (FL-2), and its flash gas is routed back into the process. The plant 3 glycol dehydration unit (Dehy-2) regenerator stream is routed to the plant 3 thermal oxidizer (TO-2), and its flash gas is routed back into the process. The gas exiting the glycol dehydrators is sent to molecular sieve dehydration beds in Plants 1, 2, and 3. Each molecular sieve is heated by a natural gas fired heater (HT-101, HT-102, and HT-103).

The gas exiting molecular sieves is sent to the Cryogenic plants (CRYO-1, CRYO-2, and CRYO-3) which include demethanizer towers. The demethanizer towers separate residue gas from natural gas liquids. The gas exiting the cryogenic plants is compressed by electric drive residue compressors and leaves the facility to a gas pipeline through custody transfer meters. The natural gas liquids are pumped to a pipeline through lease automatic custody transfer meters. Each plant's compressor blowdowns and planned SSM are routed to the respective flares (FL-1, FL-2, and FL-3).

2.0 Description of this Modification:

DLK Black River Midstream, LLC (DLK) proposes to replace the GCP O&G Permit, 6567M7 for the Black River Gas Processing Plant, which consists of Plants 1, 2 and 3, with a standard NSR construction permit. The facility dehydrates and removes water, CO_2 and natural gas liquids from sweet field gas for transportation in a sales pipeline.

DLK modification increases emissions at the facility resulting from the following: changes in operation time of engines from 2190 hours/year to 8760 hours/year; and revision of emissions based on manufacturer's data. This modification also includes addition of stabilizer heater (HT-803) and SSM/M emissions to the permit. The proposed emissions from the facility are listed in the table below:

Pollutant	**Emissions** (tons per year)
Nitrogen Dioxide	151.0
Carbon Monoxide	184.4
Volatile Organic Compounds (VOC)	227.9
Sulfur Dioxide	100.2
Particulate Matter (total suspended)	9.9
Particulate Matter (10 microns or less)	9.9
Particulate Matter (2.5 microns or less)	8.1

Pollutant	**Emissions** (tons per year)
Hydrogen Sulfide (H_2S)	1.89
Greenhouse Gas (GHG) as CO_2e	113,121.9

3.0 Source Determination:

1. The emission sources evaluated include Black River Gas Processing 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.

Note: on 8/22/2022 the answer above was changed to "yes" based on correspondence with applicant to verify Section 11 information from the application.

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.

A. The source, as determined in 3.0 above, is a minor source – for PSD applicability, before and after this modification.

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)
*6567M8	TBD	NSR - New	NSR – New permit application due to increased emissions resulting from the revision of emissions based on manufacturer's data, increased engine operation to 8760 hours/year, equipment addition, and addition of SSM/M.
6567M7	8/28/2020	GCP OG Rev	Application submitted to reduced engine operation to 2190 hours/year in order to qualify for this type of permit.
6567M6	8/20/2020	GCP OG Rev	Denied - This GCP OG application was submitted while the NSR application 6567M5 was under review.
6567M5	8/25/2020	NSR – New	Withdrawn - New permit application due to emission increases resulting from the revision of emissions based on manufacturer's data and addition of SSM/M.

6567M4	1/23/2019	GCP OG Rev	This application represents an expansion which will utilize the existing plant utilities and add the equipment outlined below to increase total treating capacity to 460 MMSCFD (Increase of 200 MMSCFD). • Amine Unit (AM-2) • Amine Reboiler (AR-2) • Dehydration Unit (DEHY-2) • Dehydrator Reboiler (DR-2) • Cryogenic System (FUG) • Process Flare HP (Flare-3) • Thermal Oxidizer (TO-2)
6567M3	9/13/2018	GCP OG	New permit application.
6567M2	9/13/2018	Sig Rev	Withdrawn. Permit modification addressed with issuance of GCP O&G permit 6567M3.
6567M1	7/21/2017	GCP-4 Permit	Expansion of facility due increased throughput from 60 MMSCFD to 260 MMSCFD, by adding four (4) compressor engines, one (1) molecular sieve heaters, one (1) hot oil heater, one (1) flare, one (1) vapor combustion unit one (1) glycol dehydrator, one (1) one glycol dehydrator reboiler, haul road emissions, and updated SSM and malfunction emissions.
6567	9/30/2016	GCP-4 Permit	New Permit – Form A

6.0 **Public Response/Concerns:** On June 24, 2021 this permit writer received correspondence from WildEarth Guardians (WEG) requesting a Public Hearing (pending) due to the impacts of the proposed permitting action to air quality and public health. As a response, the Initial Citizen letter was sent via email to WEG on June 24, 2021.

7.0 **Compliance Testing:**

Unit No.	Compliance Test	Test Dates
ENG-1	Annual Test	8/14/2020
ENG-2	Annual Test	8/13/2020
ENG-3	Annual Test	8/14/2020
ENG-4	Annual Test	8/13/2020

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. 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 Compliance and Enforcement Section dated May 13, 2021, "There is no outstanding notice of violation and no settlement agreement for which all actions have not been completed. In addition, no compliance plan needs to be placed in the NSR permit."

10.0 **Modeling:** The review and summary report was submitted by AQB Modeler Angela Raso on September 23, 2021. The conclusion states the following: *"This modeling analysis demonstrates that operation of the facility described in this report neither causes nor contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for CO, NO_2, PM2.5, PM10, and SO_2; NMAAQS for CO, H_2S, NO_2, and SO_2; and Class I and Class II PSD increments for NO_2, PM2.5, PM10, and SO_2."*

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, 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	Entire Facility	**NSR:** 20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.
2.7	Excess Emissions	Yes, Always	Entire Facility	Applies to all facilities' sources
2.23	Fugitive Dust Control	No	NA	This regulation does not apply to oil and gas facilities.
2.33	Gas Burning Equipment - Nitrogen Dioxide	No	NA	This facility DOES NOT have existing gas burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit Note: **"New gas burning equipment"** means gas burning equipment, the construction or modification of which is commenced after February 17, 1972.
2.34	Oil Burning Equipment - Nitrogen Dioxide	No	NA	This facility DOES NOT have oil burning equipment (external combustion emission sources, such as gas and oil-fired boilers and heaters) having a heat input of greater than 1,000,000 million British Thermal Units per year per unit.

STATE REGU-LATIONS Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.35	Natural Gas Processing Plant – Sulfur	No	NA	This regulation applies 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. **See 'Guidance and Clarification Regarding Applicability of 20.2.35 NMAC' located with the Air Quality Bureau's Permit Section website guidance documents.**
2.38	Hydrocarbon Storage Facilities	No	NA	20.2.38 NMAC This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	NA	This regulation could apply to sulfur recovery plants that are not part of petroleum or natural gas processing facilities.
2.61	Smoke and Visible Emissions	Yes	ENG-1, ENG-2, ENG-3, ENG-4, HT-101, HT-102, HT-103, HT-801, HT- 802, HT-803, AR-1, AR-2, VCU-1 FL-1, FL-2, FL-3, DR-1, DR-2, TO-1, TO-2	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).
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	NSR Permits are the applicable requirement, including 20.2.72 NMAC.

STATE REGU-LATIONS 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	NA	This regulation establishes requirements for obtaining a prevention of significant deterioration permit. The facility currently does not have the potential to emit greater than 250 tons per year of any criteria pollutant and, therefore, is not subject to this regulation.
2.75	Construction Permit Fees	Yes	Entire Facility	This facility is subject to 20.2.72 NMAC
2.77	New Source Performance Standards	Yes	ENG-1, ENG-2, ENG-3, ENG-4, FUG, AM-1, AM-2, CRYO-1, CRYO-2, CRYO-3, TK 702A-F, TK-701	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	NA	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	NA	This facility is not located in, not does it affect, a nonattainment area.
2.82	MACT Standards for Source Categories of HAPs	Yes	ENG-1, ENG-2, ENG-3, ENG-4, DEHY-1, DEHY-2	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	General Provisions	Yes	ENG-1, ENG-2,	Applies if any other subpart applies. ENG-1, ENG-2, ENG-3, ENG-4 are subject

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
(40 CFR 60)			ENG-3, ENG-4, FUG, AM-1, AM-2, CRYO-1, CRYO-2, CRYO-3 Tk-702A-F, TK-701	to NSPS Subpart JJJJ. FUG, AM-1, AM-2, CRYO-1, CRYO-2, CRYO-3, TK-702A-F and TK-701 are subject to NSPS Subpart OOOOa.
40 CFR60.40a, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units,	No	NA	This regulation establishes standards of performance for electric utility steam generating units. This regulation does not apply because the facility does not operate any electric utility steam generating units.
40 CFR 60.40b, Subpart Db,	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	No	NA	(a) The affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour). This regulation does not apply because the facility does not operate any electric utility steam generating units.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	NA	This regulation does not apply. Facility does not have any Commercial – Institutional Steam Generating Units.
40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and **Prior** to July 23, 1984	No	NA	Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a storage capacity greater than 151,416 liters (40,000 gallons) that is used to store petroleum liquids for which construction is commenced after May 18, 1978 and prior to July 23, 1984. The condensate tanks at this facility were constructed after July 23, 1984,

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				therefore, this subpart does not apply.
40 CFR 60, Subpart Kb	Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced **After** July 23, 1984	No	NA	Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m3) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. The tanks at this facility have a design capacity less than or equal to 1,589.874 m3 used for petroleum or condensate stored, processed, or treated prior to custody transfer. The tanks are not subject to the regulation.
40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No	NA	The provisions of this subpart are applicable to the following affected facilities: All stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired. The facility does not contain the affected units. This regulation does not apply.
40 CFR 60, Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	No	NA	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. If the unit is

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				not located at the plant site, then it is exempt from the provisions of this subpart. A *natural gas processing plant* is defined as any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both. The Black River Gas Processing is a natural gas processing plant but constructed after August 11, 2011 hence the facility is not subject to Subpart KKK.
40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO2 Emissions	No	NA	The facility is a natural gas processing plant, however, there is not sulfur recovery plant, thus this location does not meet the applicability criteria of 40 CFR 60.640.
40 CFR Part 60 Subpart IIII (Quad-I)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	No	NA	(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. Link to regulation - read more The facility does not operate an affected source under this regulation.
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark. Ignition Internal Combustion Engines	Yes	ENG-1, ENG-2, ENG-3, ENG-4	This regulation establishes standards of performance for stationary spark ignition internal combustion engines. The Waukesha engines at this facility are subject to NSPS JJJJ as it commenced construction after June 12, 2006 and were manufactured on or after July 1, 2007 [§60.4230(a)(4)(i)].
40 CFR Part 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines	No	NA	The facility does not operate an affected source under this regulation.
NSPS 40 CFR Part 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas	No	NA	The facility is NOT subject to the provisions of NSPS Subpart OOOO because the facility construction started

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
(Quad -O)	Production, Transmission and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015			after September 18, 2015.
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	Compressors for ENG-1 through ENG-4, FUG, AM-1, AM-2, CRYO-1, CRYO-2, CRYO-3, TK 702A-F, TK-701	The facility is subject to the provisions of NSPS Subpart OOOOa This regulation applies to amine units, reciprocating compressors, tanks and fugitive equipment leaks (including cryo units) which commenced construction after September 18, 2015.
NESHAP Subpart A (40 CFR 61)	General Provisions	No	NA	This facility does not emit HAPs in quantities that trigger these requirements.
MACT Subpart A (40 CFR 63)	General Provisions	Yes	ENG-1, ENG-2, ENG-3, ENG-4 DEHY-1, DEHY-2	Applies if any other subpart applies. ENG-1, ENG-2, ENG-3, ENG-4 are subject to MACT Subpart ZZZZ. DEHY-1 and DEHY-2 are subject to MACT Subpart HH.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	DEHY-1, DEHY-2	This regulation establishes national emission standards for hazardous air pollutants from oil and natural gas production facilities. The facility is not a major source of HAPs and meets the definition of a natural gas processing plant. The dehydrator will have a natural gas flow rate equal to or greater than 85 thousand standard cubic feet. The dehydrator vents less than 0.90 megagrams of benzene per year to the atmosphere and is therefore exempt from the emissions control requirements of MACT HH per 63.764(e)(1)(ii). Because the dehydrator complies with the 1 tpy control option

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				under 63.765(b)(1)(ii) it is considered to be a large dehydrator under MACT HH.
40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities	No	NA	This subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271. This regulation does not apply because this facility is not a natural gas transmission or storage facility as defined in this regulation [40 CFR Part 63.1270(a)].
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	ENG-1, ENG-2, ENG-3, ENG-4	A facility is subject to this subpart if because they own or operate a stationary RICE at a major or area source of HAP emissions.
40 CFR 64	Compliance Assurance Monitoring	Yes	DEHY-1, DEHY-2, TK-701	This regulation defines compliance assurance monitoring. This regulation does apply to the glycol dehydration units DEHY-1 and DEHY-2, and the produced water tank unit TK-701 at this facility because the units have potential pre-control device emissions that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. DLK must submit CAM Plans in the initial TV application.
40 CFR 68	Chemical Accident Prevention	Yes	Facility	Regulation applicable to an owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115 Threshold determination and 68.130 List of substances. This facility uses flammable process chemicals such as propane and will develop and maintain an RMP for these chemicals.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
40 CFR 70	Title V- State Operating Permit Programs	No	NA	Operating Permit Program – is not applicable – New Mexico State has full delegated authority and Title V is administered under 20.2.70 NMAC.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No	NA	This facility does not "service", "maintain" or "repair" Class I or Class II appliances nor "disposes" of such appliances. Thus, this regulation is not applicable.

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

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)
ST-1	Glycol Storage Tanks	100	20.2.72.202.B.2
		bbl	
ST-2	Amine Storage Tanks	300	20.2.72.202.B.2
		bbl	
ST-3	Methanol Tanks	500	20.2.72.202.B.2
		gallons	
ST-4	Lube Oil Tanks	500 & 2000	20.2.72.202.B.2
		gallons	
ST-5	Antifreeze Tanks	1000	20.2.72.202.B.2
		gallons	
Haul Roads	Haul Road Emission	N/A	20.2.72.202.B.5
		N/A	

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

A. Date of Engine Monitoring Protocol used: December 11, 2019
B. Date of Glycol Dehydrator Monitoring Protocol used: February 12, 2018
C. Date of Gas-Fired Heaters, Furnaces and Boilers Monitoring Protocols used: August 18, 2017.
D. Date of Flares Monitoring Protocol used: February 12, 2018.
E. Date of Tanks & Loading Monitoring Protocols used: September 19, 2017.

15.0 <u>For Title V action: Cross Reference Table between NSR Permit 6567-M8 and TV Permit - NA. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:</u>

Not Required, a TV permit has not been issued.

NSR conditions identified as "NSR Unique" do not establish any applicable requirements or federally enforceable conditions that require adoption in the TV operating permits.

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

A. This permit reflects newly updated conditions and current monitoring protocol language.
B. Initial Compliance Testing is not required. This facility has been operating under GCP O&G permit and all engines have been tested.
C. AQB agreed to accept the addition of 1% VCU-1 SSM per June 7, 2021 meeting with Melinda Owens, Julia Kuhn, Gauri Gajewar, Jason Conway, and Kha Mach.
D. Malfunction emissions in the application have been separated as: Venting, FL-1, FL-2, and FL-3 malfunctions.
E. Requested revision of converting DEHY-1 SSM venting to malfunction venting 8.12.21, per the consultant:
   AQB: DEHY-1's regenerator VOCs of 193.81 pph are being controlled steady-state at flare FL-2. You have requested SSMs for the regenerator emissions to vent 193.81 pph for a 2% downtime per year. What type of event would make the flare have 2% downtime to require SSM venting for those emissions?
   Gauri: The operation of the pumps associated with the regenerator has changed. Currently we have 100% back up, so if one pump is down the other pump is takes over and there aren't any SSM emissions. If the electricity goes out (a malfunction) both pumps go down and then the regenerator emissions route to atmosphere. Can we move these SSM emissions to malfunction emissions?
   AQB: We can switch the SSMs to malfunctions. But note: the maximum allowed for malfunctions is 10 tpy of any pollutant. Since there are already 6 tpy of allowable flaring emissions, that leaves up to 4 tpy of venting.