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GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

AIR QUALITY BUREAU NEW SOURCE REVIEW PERMIT

Certified Mail No:

DRAFT as of August 04, 2022

Return Receipt Requested

NSR Permit No:

6109M8

Facility Name:

Salado Draw 19 CTB and CS

Facility Owner/Operator:

Chevron U.S.A. Inc.

Mailing Address:

6301 Deauville Blvd
N3203
Midland, TX 79706

TEMPO/IDEA ID No:

35139-PRN20210001

AIRS No:

35-025-0750

Permitting Action:

Significant Permit Revision

Source Classification:

Synthetic Minor > 80

Facility Location:

630,641m E by 3,545,143m N,
Zone 13
Datum NAD 83

County:

Lea County

Air Quality Bureau Contact

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Date

Template version: 06/30/2021

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PART A FACILITY SPECIFIC REQUIREMENTS

A100 Introduction

- A. This permit, NSR 6109M8, supersedes all portions of Air Quality Permit 6109M7, issued February 13, 2020, except portions 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- A. The term of this permit is permanent unless withdrawn or cancelled by the Department.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 function of the facility is to remove water and hydrocarbon liquids from natural gas produced in the surrounding area, and to compress the gas into a pipeline for delivery to a processing plant.
- B. This facility is located approximately 25.3 miles southwest of Jal, New Mexico in Lea County.
- C. This modification consists of an updated gas analysis, updated tank emissions, and updated glycol dehydrator emissions. The description of this modification is for informational purposes only and is not enforceable.
- D. Tables 102.A and Table 102.B show the total potential emission rates (PER) from this facility for information only. This is not an enforceable condition and excludes emissions from Minor NSR exempt activities per 20.2.72.202 NMAC.

Table 102.A: Total Potential Emission Rate (PER) from Entire Facility

Pollutant	Emissions (tons per year)
Nitrogen Oxides (NO _x)	64.1
Carbon Monoxide (CO)	40.5
Volatile Organic Compounds (VOC) ¹	110.4
Sulfur Dioxide (SO ₂)	20.4
Particulate Matter 10 microns or less (PM ₁₀)	3.5
Particulate Matter 2.5 microns or less (PM _{2.5})	3.5
Hydrogen Sulfide (H ₂ S)	0.005

1. VOC total includes emissions from Fugitives, and SSM.

Table 102.B: Total Potential Emissions Rate (PER) for *Hazardous Air Pollutants (HAPs) that exceed 1.0 ton per year

Pollutant	Emissions (tons per year)
Formaldehyde	7.4
n-hexane	1.5
Total HAPs**	9.9

* 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
20.2.38 NMAC New Tank Battery	X	TK-1, TK-2, TK-3, TK-4
20.2.61 NMAC Smoke and Visible Emissions	X	ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6, HTR-1, HTR-2, HTR-3, SEP-1, SEP-2, SEP-3, REB-1, FLARE
20.2.72 NMAC Construction Permit	X	Facility
20.2.73 NMAC Notice of Intent and Emissions Inventory Requirements	X	Facility
20.2.75 NMAC Construction Permit Fees	X	Facility
20.2.77 NMAC New Source Performance Standards	X	ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6, FUG, VRU1, VRU2, VRU3, VRU4, VRU5, and VRU6
20.2.82 NMAC Maximum Achievable Control Technology Standards for Source Categories of HAPs	X	ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6, DHY-1
40 CFR 50 National Ambient Air Quality Standards	X	Facility

Table 103.A: Applicable Requirements

Applicable Requirements	Federally Enforceable	Unit No.
40 CFR 60, Subpart A, General Provisions	X	ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6; Compressors associated with: ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6, FUG
40 CFR 60, Subpart JJJJ	X	ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6
40 CFR 60, Subpart OOOOa	X	Compressors associated with: ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6, FUG, VRU1, VRU2, VRU3, VRU4, VRU5, and VRU6
40 CFR 63, Subpart A, General Provisions	X	ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6, DHY-1
40 CFR 63, Subpart HH	X	DHY-1
40 CFR 63, Subpart ZZZZ	X	ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6

A104 Facility: Regulated Sources

- A. Table 104.A 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.A: Regulated Sources List

Unit No.	Source Description	Make	Model	Serial No.	Construction/ Reconstruction Date	Manufacture Date	Manufacturer Rated Capacity /Permitted Capacity
ENG-1	Compressor Engine	Caterpillar	G3516B LE	JEF02893	07/26/2014	07/26/2014	1380 hp
ENG-2	Compressor Engine	Caterpillar	G3516B LE	N6E00108	01/12/2015	01/12/2015	1380 hp
ENG-3	Compressor Engine	Caterpillar	G3516B LE	JEF02832	06/12/2014	06/12/2014	1380 hp

Table 104.A: Regulated Sources List

Unit No.	Source Description	Make	Model	Serial No.	Construction/ Reconstruction Date	Manufacture Date	Manufacturer Rated Capacity /Permitted Capacity
ENG-4	Compressor Engine	Caterpillar	G3516B LE	N6W00213j	05/31/2017	05/31/2017	1380 hp
ENG-5	Compressor Engine	Caterpillar	G3516B LE	N6W00249	07/05/2017	07/05/2017	1380 hp
ENG-6	Compressor Engine	Caterpillar	G3516B LE	N6W00753	08/16/2018	08/16/2018	1380 hp
HTR-1	Heater Treater	Unknown	Unknown	Unknown	N/A	N/A	4 MMBtu/hr
HTR-2	Heater Treater	Unknown	Unknown	Unknown	N/A	N/A	4 MMBtu/hr
HTR-3	Heater Treater	Unknown	Unknown	Unknown	N/A	N/A	4 MMBtu/hr
SEP-1	Heated Production Separator	Unknown	Unknown	Unknown	N/A	N/A	4 MMBtu/hr
SEP-2	Heated Production Separator	Unknown	Unknown	Unknown	N/A	N/A	4 MMBtu/hr
SEP-3	Heated Production Separator	Unknown	Unknown	Unknown	N/A	N/A	4 MMBtu/hr
REB-1	TEG Reboiler	Unknown	Unknown	Unknown	N/A	N/A	1 MMBtu/hr
DHY-1	TEG Dehydrator	Unknown	Unknown	Unknown	N/A	N/A	35 Mscf/day
LOAD	Truck Loading	Unknown	Unknown	Unknown	N/A	N/A	N/A
TK-1	Condensate Storage	Unknown	Unknown	Unknown	2015	N/A	750 bbl
TK-2	Condensate Storage	Unknown	Unknown	Unknown	2015	N/A	750 bbl
TK-3	Condensate Storage	Unknown	Unknown	Unknown	2015	N/A	750 bbl
TK-4	Condensate Storage	Unknown	Unknown	Unknown	2020	N/A	750 bbl
PW-1	Water Storage	Unknown	Unknown	Unknown	2015	N/A	750 bbl
PW-2	Water Storage	Unknown	Unknown	Unknown	2015	N/A	750 bbl
PW-3	Water Storage	Unknown	Unknown	Unknown	2015	N/A	750 bbl
PW-4	Water Storage	Unknown	Unknown	Unknown	2015	N/A	750 bbl
PW-5	Water Storage	Unknown	Unknown	Unknown	2015	N/A	750 bbl
TK-S1	Slop Tank	Unknown	Unknown	Unknown	2015	N/A	750 bbl
VRU1	Vapor Recovery Unit	Flogistix	HG17222VIE	Unknown	NA	NA	NA

Table 104.A: Regulated Sources List

Unit No.	Source Description	Make	Model	Serial No.	Construction/ Reconstruction Date	Manufacture Date	Manufacturer Rated Capacity /Permitted Capacity
VRU2	Vapor Recovery Unit	Flogistix	HG12258H5I E	Unknown	NA	NA	NA
VRU3	Vapor Recovery Unit	Flogistix	HG12228H5F E	Unknown	NA	NA	NA
VRU4	Vapor Recovery Unit	Flogistix	HGF10000H1	Unknown	NA	NA	NA
VRU5	Vapor Recovery Unit	Flogistix	HGF10000H1	Unknown	NA	NA	NA
VRU6	Vapor Recovery Unit	Flogistix	HG17222VIE	Unknown	NA	NA	NA
FLARE	Flare Pilot, Purge, Predictable SSM	Zeeco	Unknown	Unknown	2015	25 MMSCFD	25 MMSCFD
SITE-SSM	SSM Activities	N/A	N/A	N/A	N/A	Unknown	N/A
FUG	Fugitives	Unknown	Unknown	Unknown	09/18/2015	N/A	N/A
MALF	Malfunction Activities	N/A	N/A	N/A	N/A	N/A	N/A
FGC-1	Flash Gas Compressor	LeROI	HG20262	Unknown	2015	TBD	1315 MSCFD

1. All TBD (to be determined) units and like-kind engine replacements must be evaluated for applicability to NSPS and MACT requirements.
2. This FGC-1 unit does not have emissions associated with normal operations, but SSM emissions are reflected in Table 107.A under SITE-SSM.

A105 Facility: Control Equipment

- A. Table 105 lists all the pollution control equipment required for this facility. Each emission point is identified by the same number that was assigned to it in the permit application.

Table 105: Control Equipment List:

Control Equipment Unit No.	Control Description	Pollutant being controlled	Control for Unit Number(s)¹
CAT-1	DCL – Oxidation – A Coat Catalyst (2 elements) C3F1-01-4A3W-31	CO, VOC, HCHO	ENG-1
CAT-2	DCL – Oxidation – A Coat Catalyst (2 elements) C3F1-01-4A3W-31	CO, VOC, HCHO	ENG-2
CAT-3	DCL – Oxidation – A Coat Catalyst (2 elements) C3F1-01-4A3W-31	CO, VOC, HCHO	ENG-3
CAT-4	DCL – Oxidation – A Coat Catalyst (2 elements) C3F1-01-4A3W-31	CO, VOC, HCHO	ENG-4
CAT-5	DCL – Oxidation – A Coat Catalyst (2 elements) C3F1-01-4A3W-31	CO, VOC, HCHO	ENG-5
CAT-6	DCL – Oxidation – A Coat Catalyst (2 elements) C3F1-01-4A3W-31	CO, VOC, HCHO	ENG-6
VRU1	Flogistix, Model #HG17222VIE	VOC	TK-1, TK-2, TK-3, TK-4, PW-1, PW-2, PW-3, PW-4, PW-5
VRU2	Flogistix, Model #HG12258H5IE	VOC	TK-1, TK-2, TK-3, TK-4, PW-1, PW-2, PW-3, PW-4, PW-5
VRU3	Flogistix, Model #HG12228H5FE	VOC	TK-S1
VRU4	Flogistix, Model #HGF10000H1	VOC	TK-1, TK-2, TK-3, TK-4, PW-1, PW-2, PW-3, PW-4, PW-5
VRU5	Flogistix, Model #HGF10000H1	VOC	TK-1, TK-2, TK-3, TK-4, PW-1, PW-2, PW-3, PW-4, PW-5
VRU6	Flogistix, Model #HG17222VIE	VOC	TK-1, TK-2, TK-3, TK-4, PW-1, PW-2, PW-3,

Unit No.	NO _x ¹ pph	NO _x ¹ tpy	CO pph	CO tpy	VOC pph	VOC tpy	SO ₂ pph	SO ₂ tpy	PM ₁₀ pph	PM ₁₀ tpy	PM _{2.5} pph	PM _{2.5} tpy	H ₂ S pph	H ₂ S tpy
DHY-1	- ³	-	-	-	0.1	0.6	-	-	-	-	-	-	-	-
LOAD	-	-	-	-	*	4.1	-	-	-	-	-	-	<	<
TK-1	-	-	-	-	0	0	-	-	-	-	-	-	<	<
TK-2	-	-	-	-	0	0	-	-	-	-	-	-	<	<
TK-3	-	-	-	-	0	0	-	-	-	-	-	-	<	<
TK-4	-	-	-	-	0	0	-	-	-	-	-	-	<	<
PW-1	-	-	-	-	0	0	-	-	-	-	-	-	<	<
PW-2	-	-	-	-	0	0	-	-	-	-	-	-	<	<
PW-3	-	-	-	-	0	0	-	-	-	-	-	-	<	<
PW-4	-	-	-	-	0	0	-	-	-	-	-	-	<	<
PW-5	-	-	-	-	0	0	-	-	-	-	-	-	<	<
TK-S1	-	-	-	-	0.3	1.3	-	-	-	-	-	-	<	<
FLARE (pilot)	0.1	0.4	0.4	1.6	0.4	1.7	0.00 1	0.00 3	-	-	-	-	0.00 0007 2	0.00 0032
FUG	-	-	-	-	5.3	23.3	-	-	-	-	-	-	<	<
FGC-1	-	-	-	-	0	0	-	-	-	-	-	-	-	-

1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO₂

2 SSM flaring is permitted in Table 107A. Steady-state/pilot-purge is noted in above table.

3 To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110F.

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

“<” indicates that the application represented the uncontrolled mass emission rates are less than 1.0 pph or 1.0 tpy for this emissions unit and this air pollutant.

“*” 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	NO _x (pph)	NO _x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO _x (pph)	SO _x (tpy)	H ₂ S (pph)	H ₂ S (tpy)
SITE-SSM from Blowdowns (Units SSMs from, DHY-1, VRU1, VRU2, VRU3, VRU4, VRU5, VRU6, ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6)	¹ Compressor & Associated Piping Blowdowns during Routine and Predictable Startup, Shutdown, and/or Maintenance (SSM)					*	3.0			<	<
MALF	¹ Venting of Gas Due to Malfunction						10				
SSM Flaring	SSM Flare	45.3	2.0	180.6	8.1	185.9	8.4	0.4	1.6	0.004	0.0002

- This authorization does not include VOC combustion emissions. “<” indicates the application represented that uncontrolled venting, blowdown, or pigging emissions of H₂S are less than 0.1 pph or 0.44 tpy. Allowable limits, monitoring, and recordkeeping are not required on this level of H₂S venting, blowdown, or pigging emissions. “*” indicates hourly emission limits are not appropriate for this operating situation.
- To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110F.

- 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. SSM VOC Emissions (Unit SITE-SSM)

Requirement: The permittee shall perform a facility inlet gas analysis once every year based on a calendar year, and complete the following recordkeeping to demonstrate compliance with routine and predictable startup, shutdown, and maintenance (SSM) emission limits in Table 107.A.

Monitoring: The permittee shall monitor the permitted routine and predictable startups and shutdowns and scheduled maintenance events.

Recordkeeping:

- (1) To demonstrate compliance, each month records shall be kept of the cumulative total of VOC emissions during the first 12 months due to SSM events and, thereafter of the monthly rolling 12-month total VOC emissions.
- (2) Records shall also be kept of the inlet gas analysis, the percent VOC of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the VOC emissions due to SSM events.
- (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.

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

D. SSM Flaring Emissions (Flare SSM)

Requirement: Compliance with routine or predictable startup, shutdown, and maintenance (SSM) emission limits in Table 107.A shall be demonstrated by operating the flare in accordance with the requirements of Condition A206.A, A206.B, A206.C and A206.D of this permit and completing monitoring and recordkeeping as specified below.

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 SSM emissions limits. These emissions shall be reported as excess emissions in accordance with 20.2.7.110 NMAC.

Monitoring: The permittee shall monitor the date, time, cause and duration of routine or predictable startup, shutdown, and scheduled maintenance events.

Recordkeeping: The permittee shall maintain records of all calculations and parameters used to determine emission rates in spreadsheet format and in accordance with Condition B109.

- (1) Hourly Emissions Calculations:** The permittee shall calculate the pph NO_x, CO, VOC, SO₂, and H₂S emission rates for each hour of each SSM event using these parameters:
- (a) the calculated average hourly flow rate of all gas combusted by the flare, including pilot, purge, and assist gas, if applicable, from Condition A205.B;
 - (b) H₂S content, total sulfur content, VOC content, and heating value (BTU/scf) of the gas from Condition A205.B;

- (c) the emission factors represented in the permit application and approved by the Department, for NO_x and CO emission rates; and
- (d) VOC and H₂S emission rates calculated using the destruction efficiency represented in the permit application and approved by the Department.

(2) Annual Emissions Calculations: The permittee shall calculate the total tpy SSM emission rates as a monthly rolling 12-month total, using the pph emission rates for each hour of the month as follows:

- (a) During the first 12 months of this condition taking effect, the permittee shall record the monthly total tons of NO_x, CO, VOC, SO₂, and H₂S emissions.
- (b) After the first 12 months of this condition taking affect, the permittee shall record the monthly rolling 12-month total tpy NO_x, CO, VOC, SO₂, and H₂S emissions.

(3) SSM Events: The permittee shall retain monitoring records, including the date, time, and duration of each SSM event, as well as a description of the event including maintenance performed.

Reporting: The permittee shall report in accordance with Condition B110.

E. Malfunction Emissions (MALF)

Requirement: The permittee shall perform a facility inlet gas analysis once every year based on a calendar year and complete the following recordkeeping to demonstrate compliance with malfunction (MALF) emission limits in Table 107.A.

Monitoring: The permittee shall monitor all malfunction events that result in VOC emissions including identification of the equipment or activity that is the source of emissions.

Recordkeeping:

- (1) To demonstrate compliance, each month records shall be kept of the cumulative total of VOC emissions due to malfunction events during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions due to malfunction events.
- (2) Records shall also be kept of the inlet gas analysis, the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the pound per hour limits in Table 106.A (or the pound per hour limits in condition B110F, if applicable), under 20.2.7 NMAC.
- (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.

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

Requirement: All combustion emission units shall combust only natural gas containing no more than 29 grains of total sulfur per 100 dry standard cubic feet.
Monitoring: No monitoring is required. Compliance is demonstrated through records.
Recordkeeping: <ul style="list-style-type: none"> (1) The permittee shall demonstrate compliance with the natural gas or fuel oil limit on total sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous or liquid fuel, or fuel gas analysis, specifying the allowable limit or less. (2) If fuel gas analysis is used, the analysis shall not be older than one year. (3) Alternatively, compliance shall be demonstrated by keeping a receipt or invoice from a commercial fuel supplier, with each fuel delivery, which shall include the delivery date, the fuel type delivered, the amount of fuel delivered, and the maximum sulfur content of the fuel.
Reporting: The permittee shall report in accordance with Section B110.

A111 Facility: 20.2.61 NMAC Opacity

- A. 20.2.61 NMAC Opacity Limit (Units ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6, HTR-1, HTR-2, HTR-3, SEP-1, SEP-2, SEP-3, REB-1, FLARE)

Requirement: Visible emissions from all stationary combustion emission stacks shall not equal or exceed an opacity of 20 percent in accordance with the requirements at 20.2.61.109 NMAC.
Monitoring: <ul style="list-style-type: none"> (1) Use of natural gas fuel constitutes compliance with 20.2.61 NMAC unless opacity equals or exceeds 20% averaged over a 10-minute period. When any visible emissions are observed during operation other than during startup mode, opacity shall be measured over

a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 9 (EPA Method 9) as required by 20.2.61.114 NMAC, or the operator will be allowed to shut down the equipment to perform maintenance/repair to eliminate the visible emissions. Following completion of equipment maintenance/repair, the operator shall conduct visible emission observations following startup in accordance with the following procedures:

- (a) Visible emissions observations shall be conducted over a 10-minute period during operation after completion of startup mode in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 22 (EPA Method 22). If no visible emissions are observed, no further action is required.
- (b) If any visible emissions are observed during completion of the EPA Method 22 observation, subsequent opacity observations shall be conducted over a 10-minute period, in accordance with the procedures at EPA Method 9 as required by 20.2.61.114 NMAC.

For the purposes of this condition, *Startup mode* is defined as the startup period that is described in the facility's startup plan.

Recordkeeping:

- (1) If any visible emissions observations were conducted, the permittee shall keep records in accordance with the requirements of Section B109 and as follows:
 - (a) For any visible emissions observations conducted in accordance with EPA Method 22, record the information on the form referenced in EPA Method 22, Section 11.2.
 - (b) For any opacity observations conducted in accordance with the requirements of EPA Method 9, record the information on the form referenced in EPA Method 9, Sections 2.2 and 2.4.

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

- A. This facility may not be relocated.

EQUIPMENT SPECIFIC REQUIREMENTS**OIL AND GAS INDUSTRY****A200 Oil and Gas Industry**

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

A201 Engines

- A. Periodic Emissions Testing (Units ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6)

Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by completing periodic emission tests during the monitoring period.

Monitoring: The permittee shall test using a portable analyzer or EPA Reference Methods subject to the requirements and limitations of Section B108, General Monitoring Requirements. Emission testing is required for NO_x and CO and shall be carried out as described below.

Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.

For units with g/hp-hr emission limits, in addition to the requirements stated in Section B108, the engine load shall be calculated by using the following equation:

$$\text{Load(Hp)} = \frac{\text{Fuel consumption (scfh)} \times \text{Measured fuel heating value (LHV btu/scf)}}{\text{Manufacturer's rated BSFC (btu/bhp-hr) at 100\% load or best efficiency}}$$

- (1) The testing shall be conducted as follows:
 - (a) Testing frequency shall be once per quarter.
 - (b) The monitoring period is defined as a calendar quarter.
- (2) The first test shall occur within the first monitoring period occurring after permit issuance.
- (3) All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period.
- (4) The permittee shall follow the General Testing Procedures of Section B111.
- (5) Performance testing required by 40 CFR 60, Subpart JJJJ or 40 CFR 63, Subpart ZZZZ may be used to satisfy these periodic testing requirements if they meet the requirements of this condition and are completed during the specified monitoring period.

Recordkeeping: The permittee shall maintain records in accordance with Section B109, B110, and B111.

Reporting: The permittee shall report in accordance with Section B109, B110, and B111.

B. Initial Compliance Test (Units ENG-5, and ENG-6)

<p>Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by performing an initial compliance test.</p>
<p>Monitoring: The permittee shall perform an initial compliance test in accordance with the General Testing Requirements of Section B111. Emission testing is required for NOx and CO. Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.</p> <p>The monitoring exemptions of Section B108 do not apply to this requirement.</p> <p>For units with g/hp-hr emission limits, the engine load shall be calculated by using the following equation: $\text{Load (Hp)} = \frac{\text{Fuel consumption (scfh)} \times \text{Measured fuel heating value (LHV btu/scf)}}{\text{Manufacturer's rated BSFC (btu/bhp-hr) at 100\% load or best efficiency}}$</p>
<p>Recordkeeping: The permittee shall maintain records in accordance with the applicable Sections in B109, B110, and B111.</p>
<p>Reporting: The permittee shall report in accordance with the applicable Sections in B109, B110, and B111.</p>

C. Catalytic Converter Operation (Units ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6)

<p>Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by:</p> <p>(1) The units shall be equipped and operated with an oxidation catalytic converter to control CO, VOC, and HAP emissions.</p> <p>The permittee shall maintain the units according to manufacturer's or supplier's recommended maintenance, including replacement of oxygen sensor as necessary for oxygen-based controllers.</p>
<p>Monitoring: The unit(s) shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.</p>
<p>Recordkeeping: The permittee shall maintain records in accordance with Section B109.</p>
<p>Reporting: The permittee shall report in accordance with Section B110.</p>

D. 40 CFR 60, Subpart JJJJ (Units ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6)

<p>Requirement: The units are subject to 40 CFR 60, Subparts A and JJJJ and shall comply with the notification requirements in Subpart A and the specific requirements of Subpart JJJJ.</p>
<p>Monitoring: The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to 60.4243.</p>

Recordkeeping: The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to 60.4245.

Reporting: The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart JJJJ, including but not limited to 60.4245.

E. 40 CFR 63, Subpart ZZZZ (Units ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, ENG-6)

Requirement: The units are subject to 40 CFR 63, Subpart ZZZZ and the permittee shall comply with all applicable requirements of Subpart A and Subpart ZZZZ.

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

Recordkeeping: The permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63, Subpart A and Subpart ZZZZ, including but not limited to 63.6655 and 63.10.

Reporting: The permittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and ZZZZ, including but not limited to 63.6645, 63.6650, 63.9, and 63.10.

A202 Glycol Dehydrators

A. Extended Gas Analysis and GRI-GLYCalc Calculation (Unit DHY-1)

Requirement: Compliance with the allowable VOC emission limits in Table 106.A shall be demonstrated by conducting an extended gas analysis on the dehydrator inlet gas annually and by calculating emissions using GRI-GLYCalc.

Monitoring: The permittee shall conduct an annual GRI-GlyCalc analysis using the most recent extended gas analysis, and verify the input data. The permittee may use a method of calculating dehydrator emissions other than the most current version of GRI-GlyCalc if approved by the Department. Changes in the calculated emissions due solely to a change in the calculation methodology shall not be deemed an exceedance of an emission limit.

Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYcalc model. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYcalc.

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

B. Glycol Pump Circulation Rate (Unit DHY-1)

Requirement: Compliance with the allowable VOC emission limits in Table 106.A shall be demonstrated by monitoring the glycol pump circulation rate for the dehydration unit shall not exceed 180 gallons per hour (3.0 gallons per minute).

Monitoring: The permittee shall monitor the circulation rate quarterly, based on a calendar quarter (January 1st through March 31st, April 1 through June 30th, July 1st through September 30th, and October 1st through December 31st). Monitoring shall include a visual inspection of pump rate setting.

Recordkeeping: The permittee shall maintain records that include a description of the monitoring and are in accordance with Section B109.

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

C. Control Device Inspection (Unit DHY-1, REB-1)

Requirement: To demonstrate compliance with the allowable VOC emission limits in Table 106.A:

- (1) The still vent emissions (Unit: DHY-1) shall be routed at all times to the associated condenser.
- (2) The flash tank vent shall be routed at all times to a process point that allows the off-gas to be recycled and recompressed, and not vented to the atmosphere.
- (3) All the non-condensed hydrocarbon vapors from the condenser associated with the DHY-1 shall be routed directly to the firebox of the reboiler and/or glowplug (Unit REB-1) and destroyed.
- (4) The condenser associated with (Unit: DEHY-1), the reboiler (Unit: REB-1), and the glowplug shall be operational at all times the facility is in operation and shall be installed, operated, and maintained according to manufacturers' specifications.

Monitoring: The permittee shall inspect the glycol dehydrator and the control equipment semi-annually to ensure it is operating in accordance with the manufacturer's recommended procedures.

Recordkeeping: The permittee shall record the inspection and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance.

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

D. 40 CFR 63, Subpart HH (Unit DHY-1)

Requirement: The unit is subject to 40 CFR 63, Subpart HH and the permittee shall comply with all applicable requirements.

Monitoring: The permittee shall monitor as required by 40 CFR 63.772(b)(2) to demonstrate facility is exempt from general standards.

Recordkeeping: The permittee shall generate and maintain the records required by 40 CFR 63.774(d)(1)(ii) to demonstrate compliance with the general standard exemptions found in 40 CFR 63.764(e).

Reporting: The permittee shall meet all applicable reporting in 40 CFR 63, Subparts A and HH and in Section B110.

A203 Tanks and VRUs

A. Condensate Tank Throughput (Units TK-1, TK-2, TK-3, TK-4)

Requirement: Compliance with the allowable VOC emission limits in Table 106.A shall be

demonstrated by limiting the monthly rolling 12-month total condensate throughput for units TK-1, TK-2, TK-3, and TK-4 to 344,925,000 gallons per year (8,212,500 barrels/year).

Monitoring: The permittee shall monitor the monthly total throughput and the upstream separator pressure once per month.

Recordkeeping: The permittee shall record:

- (1) the monthly total throughput of liquids and,
- (2) Each month the permittee shall use these values to calculate and record:
 - (a) during the first 12 months of monitoring, the cumulative total liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total liquid throughput and,
 - (b) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure.
- (3) Annually, the permittee shall calculate pre-control tank breathing, working and flashing emissions that were calculated using EPA's AP-42 Section 7.1 and the gas-oil-ratio (GOR). Emission rates computed using the same parameters, but with a different Department approved algorithm that exceed these values will not be deemed non-compliance with this permit.

Records shall be maintained in accordance with Section B109.

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

B. Water Tank Throughput (Units PW-1, PW-2, PW-3, PW-4, PW-5)

Requirement: Compliance with the allowable VOC emission limits in Table 106.A shall be demonstrated by limiting the monthly rolling 12-month total produced water throughput for units PW-1, PW-2, PW-3, PW-4 and PW-5 to 927,465,000 gallons per year (22,082,500 barrels/year).

Monitoring: The permittee shall monitor the monthly total throughput and the upstream separator pressure once per month.

Recordkeeping: The permittee shall record:

- (1) the monthly total throughput of liquids and,
- (2) Each month the permittee shall use these values to calculate and record:
 - (a) during the first 12 months of monitoring, the cumulative total liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total liquid throughput and,
 - (b) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure.
- (3) Annually, the permittee shall calculate pre-control tank breathing, working and flashing emissions that were calculated using EPA's AP-42 Section 7.1 and the gas-oil-ratio (GOR). Emission rates computed using the same parameters, but with a different Department approved algorithm that exceed these values will not be deemed non-compliance with this permit.

Records shall be maintained in accordance with Section B109.

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

C. Slop Water Tank Throughput (Unit TK-S1)

Requirement: Compliance with the allowable VOC emission limits in Table 106.A shall be demonstrated by limiting the monthly rolling 12-month total slop water throughput for unit TK-S1 to 1,533,000 gallons per year (36,500 barrels/year) and limiting the monthly rolling 12 month average separator pressure to less than 125 psia.

Monitoring: The permittee shall monitor the monthly total throughput and the upstream separator pressure once per month.

Recordkeeping: The permittee shall record:

- (1) the monthly total throughput of liquids and,
- (2) Each month the permittee shall use these values to calculate and record:
 - (a) during the first 12 months of monitoring, the cumulative total liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total liquid throughput and,
 - (b) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure.
- (3) Annually, the permittee shall calculate pre-control tank breathing, working and flashing emissions that were calculated using EPA's AP-42 Section 7.1 and the gas-oil-ratio (GOR). Emission rates computed using the same parameters, but with a different Department approved algorithm that exceed these values will not be deemed non-compliance with this permit.

Records shall be maintained in accordance with Section B109.

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

D. Redundant Vapor Recovery Units, Condensate Oil Tank, Produced Water Tanks (Units VRU-1, VRU-2, VRU-4, VRU-5, VRU-6, TK-1, TK-2, TK-3, TK-4, PW-1, PW-2, PW-3, PW-4, PW-5)

Requirement: Compliance with the allowable VOC emissions in Table 106.A shall be demonstrated by the following:

Redundant vapor recovery units (VRU-1, VRU-2, VRU-4, VRU-5, AND VRU-6) shall capture all emissions from TK-1, TK-2, TK-3, TK-4, PW-1, PW-2, PW-3, PW-4, PW-5, and route all gas to sales.

Emissions that are not captured by the VRU-1 shall be routed to VRU-2, VRU-4, VRU-5, or VRU-6 and shall not be vented to the atmosphere.

Monitoring: At least once per month, the permittee shall inspect units VRU-1, VRU-2, VRU-4, VRU-5, VRU-6, TK-1, TK-2, TK-3, TK-4, PW-1, PW-2, PW-3, PW-4, PW-5 and associated piping 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 hatches, access covers, caps, 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.

The permittee shall monitor all VRU (VRU-1, VRU-2, VRU-4, VRU-5, VRU-6) downtime.

Recordkeeping: The permittee shall record the name of the person conducting the inspections for defects and the results of the inspection chronologically, noting any maintenance or repairs that are required and when any required repairs are completed.

The permittee shall record the date, start time and end time of any downtime and or maintenance of the VRUs (VRU-1, VRU-2, VRU-4, VRU-5, VRU-6). Any emissions resulting from VRU downtimes, that are not flared under SSM emissions limits, shall be reported under 20.2.7 NMAC.

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

E. Slop Water Tank (TK-S1), Vapor Recovery Unit (VRU-3)

Requirement: Compliance with the allowable VOC emissions in Table 106.A shall be demonstrated by the following:

The Vapor Recovery Unit (VRU-3) shall capture all emissions from TK-S1 and route all gas to sales.

During VRU downtime, emissions from TK-S1 that are not captured by the unit VRU-3 that are vented to the atmosphere from TK-S1 shall not exceed the emissions established in table 106.A.

Monitoring: At least once per month, the permittee shall inspect units VRU-3, and TK-S1 and associated piping 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 hatches, access covers, caps, 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.

The permittee shall monitor all VRU (VRU-3) downtime.

Recordkeeping: The permittee shall record the name of the person conducting the inspections for defects and the results of the inspection chronologically, noting any maintenance or repairs that are required and when any required repairs are completed.

The permittee shall record the date, start time and end time of any downtime and or maintenance of the VRU (VRU-3). Any emissions resulting from VRU downtime, that are not flared under SSM emissions limits, shall be reported under 20.2.7 NMAC.

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

F. Truck Loading – Slop Water Loadout (Unit LOAD)

Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by limiting the total annual slop water loadout volume to 1,533,000 gallons per

year. (36,500 barrels/year).
Monitoring: The permittee shall monitor the slop water truck loadout volume on a monthly basis.
Recordkeeping: The permittee shall record the monthly condensate truck loadout volume. Each month during the first 12 months of monitoring the permittee shall record the cumulative slop water 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.

G. 20.2.38 NMAC, Hydrocarbon Storage Facilities (Units TK-1, TK-2, TK-3, TK-4)

Requirement: The permittee shall comply with 20.2.38.109 and 20.2.38.112 NMAC. The permittee shall install vapor recovery units to minimize hydrocarbon and hydrogen sulfide loss to the atmosphere and shall not operate the tank without the control device.
Monitoring: The permittee shall monitor the tanks operation.
Recordkeeping: The permittee shall record in accordance with Section B109
Reporting: The permittee shall report in accordance with Section B110.

A204 Heaters/Boilers

A. Operational Inspections of Boilers and/or Heaters (Units HT-1, HT-2, HT-3, SEP-1, SEP-2, SEP-3)

Requirement: <ol style="list-style-type: none"> (1) Compliance with the allowable emission limits in Table 106.A shall be demonstrated by performing annual inspections to ensure proper operation of the Heaters (HT-1, HT-2, HT-3). (2) At a minimum, the operational inspections shall meet those recommended by the manufacturer, or shall meet the facility specific procedure submitted to the Department. (3) If the permittee is using a facility specific procedure it shall submit an electronic version of the procedure to the Department’s Permit Section Manager within 90 days of implementing the procedure. If the plan cannot be submitted within 90 days, the permittee shall obtain written approval to extend the deadline from the Department’s Permit Section, either by regular or electronic mail. The permittee shall provide additional information or make changes to the plan as requested by the Department. (4) The permittee shall make changes or improvements to the inspection procedure based on experience with the unit and/or new information provided by the manufacturer. This updated procedure shall be made available to the Department upon request
Monitoring: <ol style="list-style-type: none"> (1) Inspections shall be completed at least once per year or at the frequency recommended by the manufacturer.

- (2) At a minimum, inspections shall include the following:
- (a) checking indicators to verify that the optimal amount of excess combustion air is introduced into the boiler combustion process such as a blue colored, steady flame;
 - (b) inspections of the unit(s) components and housing for cracks or worn parts.

Recordkeeping:

- (1) The permittee shall maintain records of operational inspections, including the indicators used to verify optimal excess combustion air, a description of the indicators, the unit component and housing inspections, and any adjustments needed to ensure optimal operation of the unit.
- (2) The permittee shall also keep records of the manufacturer's recommended or the permittee's facility specific operational inspection procedure and shall keep records of the percent of excess combustion air required for optimal performance.
- (3) The permittee shall maintain records in accordance with Section B109.

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

A205 Turbines – Not Required

A206 Flares

A. Flare Flame & Visible Emissions (20.2.61 NMAC) (Unit FLARE)

Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by the flare(s) being equipped with a system to ensure that it is operated with a flame present at all times and operated with no visible emissions.

The flare is subject to the 20% opacity standards in 20.2.61 NMAC and complying with the no visible emissions requirements demonstrates compliance with 20.2.61 NMAC opacity limit.

Monitoring:

- (1) **Flare Pilot Flame:** The permittee shall continuously monitor the presence of a flare pilot flame using a thermocouple or any equivalent device approved by the Department and shall be equipped with a continuous recorder and alarm or equivalent, to detect the presence of a flame.
- (2) **Visible Emissions:** Annually, the permittee shall conduct a visible emissions observation in accordance with the requirements at 40 CFR 60, Appendix A, Reference Method 22 to certify compliance with the no visible emission requirement on the process flare. The observation period is at least 2 consecutive hours where visible emissions are not to exceed a total of 5 minutes during any 2 consecutive hours.

At least once per year during a blow down event, the permittee shall conduct a visible emissions observation in accordance with the requirements at 40 CFR 60, Appendix A, Reference Method 22 to certify compliance with the no visible emission requirements. Each Method 22 test shall occur for the duration of the blow down event or for 30 minutes, whichever is less. Visible emissions shall not occur for more than 5 minutes during any consecutive 30-minute period.

For blowdown events that occur for less than 30 minutes, visible emissions shall not occur for more the 15% during the duration of the blow down event.

If the flare is located at an unmanned site, used only for emergencies, and where there are no scheduled blowdown-maintenance events to observe flare combustion, the permittee shall at a minimum conduct the visible emissions observation in accordance with the requirements of EPA Method 22 on the pilot flame.

Recordkeeping:

- (1) **Flare Pilot Flame:** The permittee shall record all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and maintenance activities.
- (2) **Visible Emissions:** For any visible emissions observations conducted in accordance with EPA Method 22, the permittee shall record the information on the form referenced in EPA Method 22, Section 11.2.

For any visible emissions observations conducted in accordance with EPA Method 22, record the information on the form referenced in EPA Method 22, Section 11.2. If the visible emissions observation was conducted only on the pilot flame, the record shall also include the reasons that the test could not be conducted during a blowdown event.

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

B. Flare Operating Requirement (Unit FLARE)

Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by installing, operating, and maintaining the flare in accordance with the manufacturer's specifications. Compliance with the operating practices according to the manufacturer's specifications demonstrates compliance with the opacity limits required by 20.2.61 NMAC.

Monitoring: The permittee shall inspect the flare monthly to ensure they are operating in accordance with the manufacturer's specifications.

Recordkeeping:

- (1) Record, chronologically, the name of the person conducting the inspection, the results of all equipment inspections, and any maintenance or repairs needed for the flare(s) to be compliant.
- (2) Maintain a copy of the manufacturer's maintenance recommendations.

Reporting: The permittee shall report in accordance with the requirements of Section B110.

C. Flare Gas Flow Monitoring and Gas Analysis (Unit FLARE)

Requirement: Requirement: Compliance with the flare allowable emission limits in Table 106.A shall be demonstrated by completing the monitoring, recordkeeping, and reporting required by this condition and Condition A205.D. All flow meters and inline monitors shall meet the minimum data capture and quality assurance requirements of Condition B108.H.

Monitoring:

(1) Gas Flow Monitoring:

- (a) One or more gas flowmeters equipped with a chart recorder or data logger (electronic storage) shall be installed to continuously monitor the flow (scf) of gas sent to the flare.
- (b) Pilot, purge, and assist gas, if applicable, shall be monitored using a gas flowmeter under
 - (a) or determined using manufacturer's specifications or engineering estimates.

(2) Gas Analysis:

- (a) Once per calendar year, the permittee shall perform a gas analysis, including measurement of the H₂S content, total sulfur content, VOC content, and heating value (BTU/scf) of gas sent to the flare for combustion. Gas analyses shall be separated by a minimum of six (6) months.
- (b) Alternatively, for H₂S only, in lieu of an annual analysis, H₂S may be measured quarterly using a stain tube(s) of the appropriate size range or with an inline chemical composition analyzer.

(3) Calibration: Flow meters and inline monitors shall be operated, calibrated, and maintained as specified by Condition B108.H and, if applicable, the site-specific operations and maintenance plan.

Recordkeeping: The following records shall be maintained in accordance with Condition B109.

(1) Gas Flow:

- (a) Records of continuous flowmeter measurements and the hourly flow rate in scf/hr calculated by averaging a minimum of four (4) equally spaced readings for each hour.
- (b) Manufacturer's specifications or engineering estimates used for pilot, purge, and assist (if applicable) gas flow rates.

(2) Gas Analysis: All sample documentation received from the laboratory or testing service company, including H₂S content, the total sulfur content, the VOC content, and the heating value (BTU/scf), analysis method utilized, and sample chain of custody. If stain tubes are used for measuring H₂S content, records of the results, including size range of stain tubes used, the date of the test, and the name of the person conducting the test.

(3) Calibration: Records of all flowmeter and inline monitor certifications, calibrations, data capture calculations and documentation as specified by Condition B108.H, as well as any breakdowns, reasons for the breakdown, and corrective actions. The permittee shall also maintain a copy of the manufacturer specifications for operation and calibration or the site-specific operations and maintenance plan for flowmeters and inline monitors.

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

D. Flare Parametric Monitoring (Unit FLARE)

Requirement: The permittee shall operate the flare in accordance with the requirements specified in recordkeeping below.

Monitoring: The permittee shall monitor the flare in accordance with Conditions A.205.A - D.

Recordkeeping:

- (1) The permittee shall use the information recorded in Condition A.205.C to calculate the flow rate to determine if the facility meets the velocity requirements of this Condition.
- (2) The maximum tip velocity of the flare, (Vmax), shall be determined annually, and records kept demonstrating that the actual flare tip velocity does not exceed the allowable Vmax.

The maximum permitted velocity (i.e., the greater of either calculated Vmax, 60 ft/sec or 400 ft/sec, based on method (a), (b), or (c) below) shall be recorded as feet/second and the corresponding total flow rate to the flare in MMscf/hour shall be used to compare to the actual volumetric flow rate (at STP) to demonstrate compliance with the maximum velocity permitted.

Compliance shall be determined utilizing either method (a), (b), or (c) below:

- (a) Actual tip velocity less than 60 feet per second (ft/sec) for gases having a lower heating value less than 1000 Btu/ft³ will be in compliance with this requirement.
- (b) Actual tip velocity less than 400 ft/sec for gases having a lower heating value greater than 1000 Btu/ft³ will be in compliance with this requirement.
- (c) Actual tip velocity less than the calculated maximum velocity (Vmax) using the following equations will be in compliance with this requirement. The calculated Vmax shall be based on the weighted mean heating value of the inlet gas plus supplemental fuel gas.

Vmax of the flare shall be calculated annually and determined using the following equation:

$$\text{Log}_{10} (V_{\text{max}}) = (\text{HT} + 28.8) / 31.7$$

Vmax=Maximum permitted velocity, M/sec

28.8=Constant

31.7=Constant

HT=The net heating value is determined using the following equation:

$$H_r = K \left[\sum_{i=1}^n C_i H_i \right]$$

where:

HT=Net heating value of the sample, MJ/scm; where the net enthalpy per mole of off-gas is based on combustion at 25 °C and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 °C;

$$K = \text{Constant}, \frac{1}{1.740 \times 10^{-7}} \left(\frac{1}{\text{ppm}} \right) \left(\frac{\text{g mole}}{\text{scm}} \right) \left(\frac{\text{MJ}}{\text{kcal}} \right)$$

where the standard temperature for $\left(\frac{\text{g mole}}{\text{scm}} \right)$ is 20°C;

Ci=Concentration of sample component “i” in ppm on a wet basis, as measured for organics by

Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-77 or 90 (Reapproved 1994); and

H_i =Net heat of combustion of sample component i , kcal/g mole at 25 °C and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 or 88 or D4809-95

The maximum permitted velocity, V_{max} , for air-assisted flares shall be determined by the following equation:

$$V_{max}=8.706 + 0.7084 (HT)$$

V_{max} =Maximum permitted velocity, m/sec

8.706=Constant

0.7084=Constant

HT=The net heating value as determined above.

3) The permittee shall maintain records in accordance with Section B109

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

A207 Sulfur Recovery Unit – Not Required

A208 Amine Unit – Not Required

A209 Fugitives

A. 40 CFR 60, Subpart OOOOa (Unit FUG)

Requirement: The collection of fugitive emissions components (as defined in 40 CFR §60.5430a) at this facility are subject to the fugitive emissions GHG and VOC leak standards at 40 CFR §60.5397a of 40 CFR 60, Subpart OOOOa. The permittee shall comply with all applicable requirements in Subparts A and OOOOa.

Monitoring: The permittee shall implement a leak detection and repair program and shall comply with the standards as specified at 40 CFR §60.5397a. Alternative means of emissions limitations at §60.5398a can only be approved by the US EPA.

Recordkeeping: The permittee shall comply with the applicable recordkeeping requirements specified at 40 CFR §60.5420a(c), including §60.5420a(c)(15)

Reporting: The permittee shall comply with the applicable reporting requirements specified at 40 CFR §60.5420a(b), including §60.5420a(b)(7).

B. 40 CFR60, Subpart OOOOa (Units Reciprocating compressors associated with ENG-1, ENG-2, ENG-3, ENG-4, ENG-5, and ENG-6)

Requirement: The permittee shall comply with 40 CFR 60, Subparts A and OOOOa if a source is constructed, modified, or reconstructed after the applicability date in 40 CFR 60.5365a; and the permittee shall comply with the notification requirements in Subpart A and the specific

requirements of Subpart OOOOa, including standards in 60.5385a.
Monitoring: The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to 60.5410a, 60.5415a(c), and 60.5415a(h).
Recordkeeping: The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to 60.5415a(c), 60.5415a(h), and 60.5420a.
Reporting: The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to 60.5420a, and Section B110.

- C. 40 CFR 60, Subpart OOOOa – Fugitives (Units VRU-1, VRU-2, VRU-3, VRU-4, VRU-5, and VRU-6)

Requirement: The units are subject to 40 CFR 60, Subparts A and OOOOa if the affected facility is constructed, modified, or reconstructed after the applicability date in 40 CFR 60.5365a and meets the applicability criteria specified at §60.5365a(j). The permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart OOOOa, including standards in §60.5397a.
Monitoring: The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5397a (or §60.5398a as approved by the US EPA), §60.5410a, and §60.5415a.
Recordkeeping: The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a.
Reporting: The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart OOOOa, including but not limited to §60.5420a, and in Section B110.

A210 Acid Gas Injection – Not Required

A211 Miscellaneous

- A. Flash Gas Compressor (FGC-1)

Requirement: Compliance with the allowable emission limits in Tables 106.A and 107.A shall be demonstrated by operating the FGC-1 at all times by routing process gas from the heater treaters to the scrubber. FGC-1 shall not vent to the atmosphere, except during allowable blowdowns under SITE-SSM.
Monitoring: At least once per month, the permittee shall inspect the FGC-1 for defects that could result in air emissions. 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 emissions to the atmosphere.
Recordkeeping: The permittee shall record the results of monthly inspections chronologically, noting any maintenance or repairs that are required.

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

PART B GENERAL CONDITIONS (Attached)

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

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

GENERAL CONDITIONS AND MISCELLANEOUS

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PART B GENERAL CONDITIONS**B100 Introduction**

- A. The Department has reviewed the permit application for the proposed construction/modification/revision and has determined that the provisions of the Act and ambient air quality standards will be met. Conditions have been imposed in this permit to assure continued compliance. 20.2.72.210.D NMAC, states that any term or condition imposed by the Department on a permit is enforceable to the same extent as a regulation of the Environmental Improvement Board.

B101 Legal

- A. The contents of a permit application specifically identified by the Department shall become the terms and conditions of the permit or permit revision. Unless modified by conditions of this permit, the permittee shall construct or modify and operate the Facility in accordance with all representations of the application and supplemental submittals that the Department relied upon to determine compliance with applicable regulations and ambient air quality standards. If the Department relied on air quality modeling to issue this permit, any change in the parameters used for this modeling shall be submitted to the Department for review. Upon the Department's request, the permittee shall submit additional modeling for review by the Department. Results of that review may require a permit modification. (20.2.72.210.A NMAC)
- B. Any future physical changes, changes in the method of operation or changes in restricted area may constitute a modification as defined by 20.2.72 NMAC, Construction Permits. Unless the source or activity is exempt under 20.2.72.202 NMAC, no modification shall begin prior to issuance of a permit. (20.2.72 NMAC Sections 200.A.2 and E, and 210.B.4)
- C. Changes in plans, specifications, and other representations stated in the application documents shall not be made if they cause a change in the method of control of emissions or in the character of emissions, will increase the discharge of emissions or affect modeling results. Any such proposed changes shall be submitted as a revision or modification. (20.2.72 NMAC Sections 200.A.2 and E, and 210.B.4)
- D. The permittee shall establish and maintain the property's Restricted Area as identified in plot plan submitted with the application. (20.2.72 NMAC Sections 200.A.2 and E, and 210.B.4)
- E. Applications for permit revisions and modifications shall be submitted to:
Program Manager, Permits Section
New Mexico Environment Department

Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505

- F. The owner or operator of a source having an excess emission shall, to the extent practicable, operate the source, including associated air pollution control equipment, in a manner consistent with good air pollutant control practices for minimizing emissions. (20.2.7.109 NMAC). The establishment of allowable malfunction emission limits does not supersede this requirement.

B102 Authority

- A. This permit is issued pursuant to the Air Quality Control Act (Act) and regulations adopted pursuant to the Act including Title 20, Chapter 2, Part 72 of the New Mexico Administrative Code (NMAC), (20.2.72 NMAC), Construction Permits and is enforceable pursuant to the Act and the air quality control regulations applicable to this source.
- B. The Department is the Administrator for 40 CFR Parts 60, 61, and 63 pursuant to the delegation and exceptions of Section 10 of 20.2.77 NMAC (NSPS), 20.2.78 NMAC (NESHAP), and 20.2.82 NMAC (MACT).

B103 Annual Fee

- A. The Department will assess an annual fee for this Facility. The regulation 20.2.75 NMAC set the fee amount at \$1,500 through 2004 and requires it to be adjusted annually for the Consumer Price Index on January 1. The current fee amount is available by contacting the Department or can be found on the Department's website. The AQB will invoice the permittee for the annual fee amount at the beginning of each calendar year. This fee does not apply to sources which are assessed an annual fee in accordance with 20.2.71 NMAC. For sources that satisfy the definition of "small business" in 20.2.75.7.F NMAC, this annual fee will be divided by two. (20.2.75.11 NMAC)
- B. All fees shall be remitted in the form of a corporate check, certified check, or money order made payable to the "NM Environment Department, AQB" mailed to the address shown on the invoice and shall be accompanied by the remittance slip attached to the invoice.

B104 Appeal Procedures

- A. Any person who participated in a permitting action before the Department and who is adversely affected by such permitting action, may file a petition for hearing before the Environmental Improvement Board. The petition shall be made in writing to the

Environmental Improvement Board within thirty (30) days from the date notice is given of the Department's action and shall specify the portions of the permitting action to which the petitioner objects, certify that a copy of the petition has been mailed or hand-delivered and attach a copy of the permitting action for which review is sought. Unless a timely request for hearing is made, the decision of the Department shall be final. The petition shall be copied simultaneously to the Department upon receipt of the appeal notice. If the petitioner is not the applicant or permittee, the petitioner shall mail or hand-deliver a copy of the petition to the applicant or permittee. The Department shall certify the administrative record to the board. Petitions for a hearing shall be sent to: (20.2.72.207.F NMAC)

For Mailing:

Administrator, New Mexico Environmental Improvement Board
P.O. Box 5469
Santa Fe, NM 87502-5469

For Hand Delivery:

Administrator, New Mexico Environmental Improvement Board
1190 St. Francis Drive, Harold Runnels Bldg.
Santa Fe, New Mexico 87505

B105 Submittal of Reports and Certifications

- A. Stack Test Protocols and Stack Test Reports shall be submitted electronically to Stacktest.AQB@state.nm.us or as directed by the Department.
- B. Excess Emission Reports shall be submitted as directed by the Department. (20.2.7.110 NMAC)
- C. Routine reports shall be submitted to the mailing address below, or as directed by the Department:

Manager, Compliance and Enforcement Section
New Mexico Environment Department
Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505

B106 NSPS and/or MACT Startup, Shutdown, and Malfunction Operations

- A. If a facility is subject to a NSPS standard in 40 CFR 60, each owner or operator that installs and operates a continuous monitoring device required by a NSPS regulation shall comply with the excess emissions reporting requirements in accordance with 40 CFR 60.7(c), unless specifically exempted in the applicable subpart.

- B. If a facility is subject to a NSPS standard in 40 CFR 60, then in accordance with 40 CFR 60.8(c), emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction shall not be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.
- C. If a facility is subject to a MACT standard in 40 CFR 63, then the facility is subject to the requirement for a Startup, Shutdown and Malfunction Plan (SSM) under 40 CFR 63.6(e)(3), unless specifically exempted in the applicable subpart.

B107 Startup, Shutdown, and Maintenance Operations

- A. The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)

B108 General Monitoring Requirements

- A. These requirements do not supersede or relax requirements of federal regulations.
- B. The following monitoring requirements shall be used to determine compliance with applicable requirements and emission limits. Any sampling, whether by portable analyzer or EPA reference method, that measures an emission rate over the applicable averaging period greater than an emission limit in this permit constitutes noncompliance with this permit. The Department may require, at its discretion, additional tests pursuant to EPA Reference Methods at any time, including when sampling by portable analyzer measures an emission rate greater than an emission limit in this permit; but such requirement shall not be construed as a determination that the sampling by portable analyzer does not establish noncompliance with this permit and shall not stay enforcement of such noncompliance based on the sampling by portable analyzer.
- C. If the emission unit is shutdown at the time when periodic monitoring is due to be completed, the permittee is not required to restart the unit for the sole purpose of conducting the monitoring. Using electronic or written mail, the permittee shall notify the Department's Compliance and Enforcement Section of a delay in emission tests prior to the deadline for completing the tests. Upon recommencing operation, the permittee shall submit pre-test notification(s) to the Department's Compliance and Enforcement Section and shall complete the monitoring.

- D. The requirement for monitoring during any monitoring period is based on the percentage of time that the unit has operated. However, to invoke the monitoring period exemption at B108.D(2), hours of operation shall be monitored and recorded.
- (1) If the emission unit has operated for more than 25% of a monitoring period, then the permittee shall conduct monitoring during that period.
 - (2) If the emission unit has operated for 25% or less of a monitoring period then the monitoring is not required. After two successive periods without monitoring, the permittee shall conduct monitoring during the next period regardless of the time operated during that period, except that for any monitoring period in which a unit has operated for less than 10% of the monitoring period, the period will not be considered as one of the two successive periods.
 - (3) If invoking the monitoring **period** exemption in B108.D(2), the actual operating time of a unit shall not exceed the monitoring period required by this permit before the required monitoring is performed. For example, if the monitoring period is annual, the operating hours of the unit shall not exceed 8760 hours before monitoring is conducted. Regardless of the time that a unit actually operates, a minimum of one of each type of monitoring activity shall be conducted during any five-year period.
- E. For all periodic monitoring events, except when a federal or state regulation is more stringent, three test runs shall be conducted at 90% or greater of the unit's capacity as stated in this permit, or in the permit application if not in the permit, and at additional loads when requested by the Department. If the 90% capacity cannot be achieved, the monitoring will be conducted at the maximum achievable load under prevailing operating conditions except when a federal or state regulation requires more restrictive test conditions. The load and the parameters used to calculate it shall be recorded to document operating conditions and shall be included with the monitoring report.
- F. When requested by the Department, the permittee shall provide schedules of testing and monitoring activities. Compliance tests from previous NSR and Title V permits may be re-imposed if it is deemed necessary by the Department to determine whether the source is in compliance with applicable regulations or permit conditions.
- G. If monitoring is new or is in addition to monitoring imposed by an existing applicable requirement, it shall become effective 120 days after the date of permit issuance. For emission units that have not commenced operation, the associated new or additional monitoring shall not apply until 120 days after the units commence operation. All pre-existing monitoring requirements incorporated in this permit shall continue to apply from the date of permit issuance.
- H. Unless otherwise indicated by Specific Conditions or regulatory requirements, all instrumentation used for monitoring in accordance with applicable requirements including emission limits, to measure parameters including but not limited to flow, temperature, pressure and chemical composition, or used to continuously monitor

emission rates and/or other process operating parameters, shall be subject to the following requirements:

- (1) The owner or operator shall install, calibrate, operate and maintain monitoring instrumentation (monitor) according to the manufacturer's procedures and specifications and the following requirements.
 - (a) The monitor shall be located in a position that provides a representative measurement of the parameter that is being monitored.
 - (b) At a minimum, the monitor shall complete one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.
 - (c) At a minimum, the monitor shall be spanned to measure the normal range +/- 5% of the parameter that is being monitored.
 - (d) At least semi-annually, perform a visual inspection of all components of the monitor for physical and operational integrity and all electrical connections for oxidation and galvanic corrosion.
 - (e) Recalibrate the monitor in accordance with the manufacturer's procedures and specifications at the frequency specified by the manufacturer, or every two years, whichever is less.
- (2) Except for malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall operate and maintain all monitoring equipment at all times that the emissions unit or the associated process is operating.
- (3) The monitor shall measure data for a minimum of 90 percent of the time that the emissions unit or the associated process is in operation, based on a calendar monthly average.
- (4) The owner or operator shall maintain records in accordance with Section B109 to demonstrate compliance with the requirements in B108H (1)-(3) above, as applicable.

B109 General Recordkeeping Requirements

- A. The permittee shall maintain records to assure and verify compliance with the terms and conditions of this permit and any other applicable requirements that become effective after permit issuance. The minimum information to be included in these records is as follows:
 - (1) Records required for testing and sampling:
 - (a) equipment identification (include make, model and serial number for all tested equipment and emission controls)
 - (b) date(s) and time(s) of sampling or measurements
 - (c) date(s) analyses were performed

- (d) the qualified entity that performed the analyses
 - (e) analytical or test methods used
 - (f) results of analyses or tests
 - (g) operating conditions existing at the time of sampling or measurement
- (2) Records required for equipment inspections and/or maintenance required by this permit:
- (a) equipment identification number (including make, model and serial number)
 - (b) date(s) and time(s) of inspection, maintenance, and/or repair
 - (c) date(s) any subsequent analyses were performed (if applicable)
 - (d) name of the person or qualified entity conducting the inspection, maintenance, and/or repair
 - (e) copy of the equipment manufacturer's or the owner or operator's maintenance or repair recommendations (if required to demonstrate compliance with a permit condition)
 - (f) description of maintenance or repair activities conducted
 - (g) all results of any required parameter readings
 - (h) a description of the physical condition of the equipment as found during any required inspection
 - (i) results of required equipment inspections including a description of any condition which required adjustment to bring the equipment back into compliance and a description of the required adjustments
- B. Except as provided in the Specific Conditions, records shall be maintained on-site or at the permittee's local business office for a minimum of two (2) years from the time of recording and shall be made available to Department personnel upon request. Sources subject to 20.2.70 NMAC "Operating Permits" shall maintain records on-site for a minimum of five (5) years from the time of recording.
- C. Unless otherwise indicated by Specific Conditions, the permittee shall keep the following records for malfunction emissions and routine or predictable emissions during startup, shutdown, and scheduled maintenance (SSM):
- (1) The owner or operator of a source subject to a permit shall establish and implement a plan to minimize emissions during routine or predictable startup, shutdown, and scheduled maintenance through work practice standards and good air pollution control practices. This requirement shall not apply to any affected facility defined in and subject to an emissions standard and an equivalent plan under 40 CFR Part 60 (NSPS), 40 CFR Part 63 (MACT), or an equivalent plan under 20.2.72 NMAC - Construction Permits, 20.2.70 NMAC - Operating Permits, 20.2.74 NMAC -

Permits - Prevention of Significant Deterioration (PSD), or 20.2.79 NMAC - Permits - Nonattainment Areas. The permittee shall keep records of all sources subject to the plan to minimize emissions during routine or predictable SSM and shall record if the source is subject to an alternative plan and therefore, not subject to the plan requirements under 20.2.7.14.A NMAC.

- (2) If the facility has allowable SSM emission limits in this permit, the permittee shall record all SSM events, including the date, the start time, the end time, a description of the event, and a description of the cause of the event. This record also shall include a copy of the manufacturer's, or equivalent, documentation showing that any maintenance qualified as scheduled. Scheduled maintenance is an activity that occurs at an established frequency pursuant to a written protocol published by the manufacturer or other reliable source. The authorization of allowable SSM emissions does not supersede any applicable federal or state standard. The most stringent requirement applies.
- (3) If the facility has allowable malfunction emission limits in this permit, the permittee shall record all malfunction events to be applied against these limits. The permittee shall also include the date, the start time, the end time, and a description of the event. **Malfunction means** any sudden and unavoidable failure of air pollution control equipment or process equipment beyond the control of the owner or operator, including malfunction during startup or shutdown. A failure that is caused entirely or in part by poor maintenance, careless operation, or any other preventable equipment breakdown shall not be considered a malfunction. (20.2.7.7.E NMAC) The authorization of allowable malfunction emissions does not supersede any applicable federal or state standard. The most stringent requirement applies. This authorization only allows the permittee to avoid submitting reports under 20.2.7 NMAC for total annual emissions that are below the authorized malfunction emission limit.
- (4) The owner or operator of a source shall meet the operational plan defining the measures to be taken to mitigate source emissions during malfunction, startup or shutdown. (20.2.72.203.A(5) NMAC)

B110 General Reporting Requirements

(20.2.72 NMAC Sections 210 and 212)

- A. Records and reports shall be maintained on-site or at the permittee's local business office unless specifically required to be submitted to the Department or EPA by another condition of this permit or by a state or federal regulation. Records for unmanned sites may be kept at the nearest business office.
- B. The permittee shall notify the Department's Compliance Reporting Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B):

- (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date;
 - (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and
 - (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.
- C. The permittee shall notify the Department's Permitting Program Manager, in writing of, or provide the Department with (20.2.72.212.C and D):
- (1) any change of operators or any equipment substitutions within fifteen (15) days of such change;
 - (2) any necessary update or correction no more than sixty (60) days after the operator knows or should have known of the condition necessitating the update or correction of the permit.
- D. Results of emission tests and monitoring for each pollutant (except opacity) shall be reported in pounds per hour (unless otherwise specified) and tons per year. Opacity shall be reported in percent. The number of significant figures corresponding to the full accuracy inherent in the testing instrument or Method test used to obtain the data shall be used to calculate and report test results in accordance with 20.2.1.116.B and C NMAC. Upon request by the Department, CEMS and other tabular data shall be submitted in editable, MS Excel format.
- E. The permittee shall submit reports of excess emissions in accordance with 20.2.7.110.A NMAC.
- F. Allowable Emission Limits for Excess Emissions Reporting for Flares and Other Regulated Sources with No Pound per Hour (pph) and/or Ton per Year (tpy) Emission Limits.
- (1) When a flare has no allowable pph and/or tpy emission limits in Sections A106 and/or A107, the authorized allowable emissions include only the combustion of pilot and/or purge gas. Compliance is demonstrated by limiting the gas stream to the flare to only pilot and/or purge gas.
 - (2) For excess emissions reporting as required by 20.2.7 NMAC, the allowable emission limits are 1.0 pph and 1.0 tpy for each regulated air pollutant (except for H₂S) emitted by that source as follows:
 - (a) For flares, when there are no allowable emission limits in Sections A106 and/or A107.

- (b) For regulated sources with emission limits in Sections A106 or A107 represented by the less than sign (“<”).
 - (c) For regulated sources that normally would not emit any regulated air pollutants, including but not limited to vents, pressure relief devices, connectors, etc.
- (3) For excess emissions reporting as required by 20.2.7 NMAC for H₂S, the allowable limits are 0.1 pph and 0.44 tpy for each applicable scenario addressed in paragraph (2) above.

B111 General Testing Requirements

Unless otherwise indicated by Specific Conditions or regulatory requirements, the permittee shall conduct testing in accordance with the requirements in Sections B111A, B, C, D and E, as applicable.

A. Initial Compliance Tests

The permittee shall conduct initial compliance tests in accordance with the following requirements:

- (1) Initial compliance test requirements from previous permits (if any) are still in effect, unless the tests have been satisfactorily completed. Compliance tests may be re-imposed if it is deemed necessary by the Department to determine whether the source is in compliance with applicable regulations or permit conditions. (20.2.72 NMAC Sections 210.C and 213)
- (2) Initial compliance tests shall be conducted within sixty (60) days after the unit(s) achieve the maximum normal production rate. If the maximum normal production rate does not occur within one hundred twenty (120) days of source startup, then the tests must be conducted no later than one hundred eighty (180) days after initial startup of the source.
- (3) The default time period for each test run shall be **at least** 60 minutes and each performance test shall consist of three separate runs using the applicable test method. For the purpose of determining compliance with an applicable emission limit, the arithmetic mean of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the Department approval, be determined using the arithmetic mean of the results of the two other runs.
- (4) Testing of emissions shall be conducted with the emissions unit operating at 90 to 100 percent of the maximum operating rate allowed by the permit. If it is not possible to test at that rate, the source may test at a lower operating rate

- (5) Testing performed at less than 90 percent of permitted capacity will limit emission unit operation to 110 percent of the tested capacity until a new test is conducted.
- (6) If conditions change such that unit operation above 110 percent of tested capacity is possible, the source must submit a protocol to the Department within 30 days of such change to conduct a new emissions test.

B. EPA Reference Method Tests

The test methods in Section B111.B(1) shall be used for all initial compliance tests and all Relative Accuracy Test Audits (RATAs), and shall be used if a permittee chooses to use EPA test methods for periodic monitoring. Test methods that are not listed in Section B111.B(1) may be used in accordance with the requirements at Section B111.B(2).

- (1) All compliance tests required by this permit shall be conducted in accordance with the requirements of CFR Title 40, Part 60, Subpart A, General Provisions, and the following EPA Reference Methods as specified by CFR Title 40, Part 60, Appendix A:
 - (a) Methods 1 through 4 for stack gas flowrate
 - (b) Method 5 for particulate matter (PM)
 - (c) Method 6C SO₂
 - (d) Method 7E for NO_x (test results shall be expressed as nitrogen dioxide (NO₂) using a molecular weight of 46 lb/lb-mol in all calculations (each ppm of NO/NO₂ is equivalent to 1.194 x 10⁻⁷ lb/SCF)
 - (e) Method 9 for visual determination of opacity
 - (f) Method 10 for CO
 - (g) Method 19 for particulate, sulfur dioxide and nitrogen oxides emission rates. In addition, Method 19 may be used in lieu of Methods 1-4 for stack gas flowrate. The permittee shall provide a contemporaneous fuel gas analysis (preferably on the day of the test, but no earlier than three months prior to the test date) and a recent fuel flow meter calibration certificate (within the most recent quarter) with the final test report.
 - (h) Method 7E or 20 for Turbines per §60.335 or §60.4400
 - (i) Method 22 for visual determination of fugitive emissions from material sources and smoke emissions from flares
 - (j) Method 25A for VOC reduction efficiency
 - (k) Method 29 for Metals
 - (l) Method 30B for Mercury from Coal-Fired Combustion Sources Using Carbon Sorbent Traps
 - (m) Method 201A for filterable PM₁₀ and PM_{2.5}

- (n) Method 202 for condensable PM
 - (o) Method 320 for organic Hazardous Air Pollutants (HAPs)
 - (2) Permittees may propose test method(s) that are not listed in Section B111.B(1). These methods may be used if prior approval is received from the Department.
- C. Periodic Monitoring and Portable Analyzer Requirements for the Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Concentrations in Emissions from Reciprocating Engines, Combustion Turbines, Boilers, and Process Heaters
- Periodic emissions tests (periodic monitoring) shall be conducted in accordance with the following requirements:
- (1) Periodic emissions tests may be conducted in accordance with EPA Reference Methods or by utilizing a portable analyzer. Periodic monitoring utilizing a portable analyzer shall be conducted in accordance with the requirements of the current version of ASTM D 6522. However, if a facility has met a previously approved Department criterion for portable analyzers, the analyzer may be operated in accordance with that criterion until it is replaced.
 - (2) The default time period for each test run shall be **at least** 20 minutes.
Each performance test shall consist of three separate runs. The arithmetic mean of results of the three runs shall be used to determine compliance with the applicable emission limit.
 - (3) Testing of emissions shall be conducted in accordance with the requirements at Section B108.E.
 - (4) During emissions tests, pollutant and diluent concentration shall be monitored and recorded. Fuel flow rate shall be monitored and recorded if stack gas flow rate is determined utilizing Reference Method 19. This information shall be included with the test report furnished to the Department.
 - (5) Stack gas flow rate shall be calculated in accordance with Reference Method 19 utilizing fuel flow rate (scf) determined by a dedicated fuel flow meter and fuel heating value (Btu/scf). The permittee shall provide a contemporaneous fuel gas analysis (preferably on the day of the test, but no earlier than three months prior to the test date) and a recent fuel flow meter calibration certificate (within the most recent quarter) with the final test report. Alternatively, stack gas flow rate may be determined by using EPA Reference Methods 1-4.
 - (6) The permittee shall submit a notification and protocol for periodic emissions tests upon the request of the Department.
- D. Initial Compliance Test and RATA Procedures
- Permittees required to conduct initial compliance tests and/or RATAs shall comply with the following requirements:

- (1) The permittee shall submit a notification and test protocol to the Department's Program Manager, Compliance and Enforcement Section, at least thirty (30) days before the test date and allow a representative of the Department to be present at the test. Proposals to use test method(s) that are not listed in Section B111.B(1) (if applicable) shall be included in this notification.
- (2) Contents of test notifications, protocols and test reports shall conform to the format specified by the Department's Universal Test Notification, Protocol and Report Form and Instructions. Current forms and instructions are posted to NMED's Air Quality web site under Compliance and Enforcement Testing.
- (3) The permittee shall provide (a) sampling ports adequate for the test methods applicable to the facility, (b) safe sampling platforms, (c) safe access to sampling platforms and (d) utilities for sampling and testing equipment.
- (4) Where necessary to prevent cyclonic flow in the stack, flow straighteners shall be installed

E. General Compliance Test Procedures

The following requirements shall apply to all initial compliance and periodic emissions tests and all RATAs:

- (1) Equipment shall be tested in the "as found" condition. Equipment may not be adjusted or tuned prior to any test for the purpose of lowering emissions, and then returned to previous settings or operating conditions after the test is complete.
- (2) The stack shall be of sufficient height and diameter and the sample ports shall be located so that a representative test of the emissions can be performed in accordance with the requirements of EPA Reference Method 1 or the current version of ASTM D 6522, as applicable.
- (3) Test reports shall be submitted to the Department no later than 30 days after completion of the test.

B112 Compliance

- A. The Department shall be given the right to enter the facility at all reasonable times to verify the terms and conditions of this permit. Required records shall be organized by date and subject matter and shall at all times be readily available for inspection. The permittee, upon verbal or written request from an authorized representative of the Department who appears at the facility, shall immediately produce for inspection or copying any records required to be maintained at the facility. Upon written request at other times, the permittee shall deliver to the Department paper or electronic copies of any and all required records maintained on site or at an off-site location. Requested records shall be copied and delivered at the permittee's expense within three business days from receipt of request unless the Department allows additional time. Required records may include records required by permit and other information necessary to

demonstrate compliance with terms and conditions of this permit. (NMSA 1978, Section 74-2-13)

- B. A copy of the most recent permit(s) issued by the Department shall be kept at the permitted facility or (for unmanned sites) at the nearest company office and shall be made available to Department personnel for inspection upon request. (20.2.72.210.B.4 NMAC)
- C. Emissions limits associated with the energy input of a Unit, i.e. lb/MMBtu, shall apply at all times unless stated otherwise in a Specific Condition of this permit. The averaging time for each emissions limit, including those based on energy input of a Unit (i.e. lb/MMBtu) is one (1) hour unless stated otherwise in a Specific Condition of this permit or in the applicable requirement that establishes the limit.

B113 Permit Cancellation and Revocation

- A. The Department may revoke this permit if the applicant or permittee has knowingly and willfully misrepresented a material fact in the application for the permit. Revocation will be made in writing, and an administrative appeal may be taken to the Secretary of the Department within thirty (30) days. Appeals will be handled in accordance with the Department's Rules Governing Appeals From Compliance Orders.
- B. The Department shall automatically cancel any permit for any source which ceases operation for five (5) years or more, or permanently. Reactivation of any source after the five (5) year period shall require a new permit. (20.2.72 NMAC)
- C. The Department may cancel a permit if the construction or modification is not commenced within two (2) years from the date of issuance or if, during the construction or modification, work is suspended for a total of one (1) year. (20.2.72 NMAC)

B114 Notification to Subsequent Owners

- A. The permit and conditions apply in the event of any change in control or ownership of the Facility. No permit modification is required in such case. However, in the event of any such change in control or ownership, the permittee shall notify the succeeding owner of the permit and conditions and shall notify the Department's Program Manager, Permits Section of the change in ownership within fifteen (15) days of that change. (20.2.72.212.C NMAC)
- B. Any new owner or operator shall notify the Department's Program Manager, Permits Section, within thirty (30) days of assuming ownership, of the new owner's or operator's name and address. (20.2.73.200.E.3 NMAC)

B115 Asbestos Demolition

- A. Before any asbestos demolition or renovation work, the permittee shall determine whether 40 CFR 61 Subpart M, National Emissions Standards for Asbestos applies. If required, the permittee shall notify the Department's Program Manager, Compliance and Enforcement Section using forms furnished by the Department.

B116 Short Term Engine Replacement

- A. The following Alternative Operating Scenario (AOS) addresses engine breakdown or periodic maintenance and repair, which requires the use of a short term replacement engine. The following requirements do not apply to engines that are exempt per 20.2.72.202.B(3) NMAC. Changes to exempt engines must be reported in accordance with 20.2.72.202.B NMAC. A short term replacement engine may be substituted for any engine allowed by this permit for no more than 120 days in any rolling twelve month period per permitted engine. The compliance demonstrations required as part of this AOS are in addition to any other compliance demonstrations required by this permit.
- (1) The permittee may temporarily replace an existing engine that is subject to the emission limits set forth in this permit with another engine regardless of manufacturer, model, and horsepower without modifying this permit. The permittee shall submit written notification to the Department within 15 days of the date of engine substitution according to condition B110.C(1).
- (a) The potential emission rates of the replacement engine shall be determined using the replacement engine's manufacturer specifications and shall comply with the existing engine's permitted emission limits.
- (b) The direction of the exhaust stack for the replacement engine shall be either vertical or the same direction as for the existing engine. The replacement engine's stack height and flow parameters shall be at least as effective in the dispersion of air pollutants as the modeled stack height and flow parameters for the existing permitted engine. The following equation may be used to show that the replacement engine disperses pollutants as well as the existing engine. The value calculated for the replacement engine on the right side of the equation shall be equal to or greater than the value for the existing engine on the left side of the equation. The permitting page of the Air Quality Bureau website contains a spreadsheet that performs this calculation.

EXISTING ENGINEREPLACEMENT ENGINE

$$\frac{[(g) \times (h1)] + [(v1)^2/2] + [(c) \times (T1)]}{q1} \leq \frac{[(g) \times (h2)] + [(v2)^2/2] + [(c) \times (T2)]}{q2}$$

Where

g = gravitational constant = 32.2 ft/sec²

h_1 = existing stack height, feet

v_1 = exhaust velocity, existing engine, feet per second

c = specific heat of exhaust, 0.28 BTU/lb-degree F

T_1 = absolute temperature of exhaust, existing engine = degree F + 460

q_1 = permitted allowable emission rate, existing engine, lbs/hour

h_2 = replacement stack height, feet

v_2 = exhaust velocity, replacement engine, feet per second

T_2 = absolute temperature of exhaust, replacement engine = degree F + 460

q_2 = manufacturer's potential emission rate, replacement engine, lbs/hour

The permittee shall keep records showing that the replacement engine is at least as effective in the dispersion of air pollutants as the existing engine.

- (c) Test measurement of NO_x and CO emissions from the temporary replacement engine shall be performed in accordance with Section B111 with the exception of Condition B111A(2) and B111B for EPA Reference Methods Tests or Section B111C for portable analyzer test measurements. Compliance test(s) shall be conducted within fifteen (15) days after the unit begins operation, and records of the results shall be kept according to section B109.B. This test shall be performed even if the engine is removed prior to 15 days on site.
- i. These compliance tests are not required for an engine certified under 40CFR60, subparts IIII, or JJJJ, or 40CFR63, subpart ZZZZ if the permittee demonstrates that one of these requirements causes such engine to comply with all emission limits of this permit. The permittee shall submit this demonstration to the Department within 48 hours of placing the new unit into operation. This submittal shall include documentation that the engine is certified, that the engine is within its useful life, as defined and specified in the applicable requirement, and shall include calculations showing that the applicable emissions standards result in compliance with the permit limits.
 - ii. These compliance tests are not required if a test was conducted by portable analyzer or by EPA Method test (including any required by 40CFR60, subparts IIII and JJJJ and 40CFR63, subpart ZZZZ) within the last 12 months. These previous tests are valid only if conducted at the same or lower elevation as the existing engine location prior to commencing operation as a temporary replacement. A copy of the test results shall be kept according to section B109.B.

- (d) Compliance tests for NO_x and CO shall be conducted if requested by the Department in writing to determine whether the replacement engine is in compliance with applicable regulations or permit conditions.
 - (e) Upon determining that emissions data developed according to B116.A.1(c) fail to indicate compliance with either the NO_x or CO emission limits, the permittee shall notify the Department within 48 hours. Also within that time, the permittee shall implement one of the following corrective actions:
 - i. The engine shall be adjusted to reduce NO_x and CO emissions and tested per B116.A.1(c) to demonstrate compliance with permit limits.
 - ii. The engine shall discontinue operation or be replaced with a different unit.
- (2) Short term replacement engines, whether of the same manufacturer, model, and horsepower, or of a different manufacturer, model, or horsepower, are subject to all federal and state applicable requirements, regardless of whether they are set forth in this permit (including monitoring and recordkeeping), and shall be subject to any shield afforded by this permit.
 - (3) The permittee shall maintain a contemporaneous record documenting the unit number, manufacturer, model number, horsepower, emission factors, emission test results, and serial number of any existing engine that is replaced, and the replacement engine. Additionally, the record shall document the replacement duration in days, and the beginning and end dates of the short term engine replacement.
 - (4) The permittee shall maintain records of a regulatory applicability determination for each replacement engine (including 40CFR60, subparts III and JJJJ and 40CFR63, subpart ZZZZ) and shall comply with all associated regulatory requirements.
- B. Additional requirements for replacement of engines at sources that are major as defined in regulation 20.2.74 NMAC, Permits – Prevention of Significant Deterioration, section 7.AG. For sources that are major under PSD, the total cumulative operating hours of the replacement engine shall be limited using the following procedure:
- (1) Daily, the actual emissions from the replacement engine(s) of each pollutant regulated by this permit for the existing engine shall be calculated and recorded.
 - (2) The sum of the total actual emissions since the commencement of operation of the replacement engine(s) shall not equal or exceed the significant emission rates in Table 2 of 20.2.74 NMAC, section 502 for the time that the replacement engine is located at the facility.
- C. All records required by this section shall be kept according to section B109.

PART C MISCELLANEOUS**C100 Supporting On-Line Documents**

- A. Copies of the following documents can be downloaded from NMED's web site under Compliance and Enforcement or requested from the Bureau.
- (1) Excess Emission Form (for reporting deviations and emergencies)
 - (2) Universal Stack Test Notification, Protocol and Report Form and Instructions

C101 Definitions

- A. **"Daylight"** is defined as the time period between sunrise and sunset, as defined by the Astronomical Applications Department of the U.S. Naval Observatory. (Data for one day or a table of sunrise/sunset for an entire year can be obtained at <http://aa.usno.navy.mil/>. Alternatively, these times can be obtained from a Farmer's Almanac or from <http://www.almanac.com/rise/>).
- B. **"Decommission"** and **"Decommissioning"** applies to units left on site (not removed) and is defined as the complete disconnecting of equipment, emission sources or activities from the process by disconnecting all connections necessary for operation (i.e. piping, electrical, controls, ductwork, etc.).
- C. **"Exempt Sources"** and **"Exempt Activities"** is defined as those sources or activities that are exempted in accordance with 20.2.72.202 NMAC. Note; exemptions are only valid for most 20.2.72 NMAC permitting actions.
- D. **"Fugitive Emission"** means those emissions which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.
- E. **"Insignificant Activities"** means those activities which have been listed by the department and approved by the administrator as insignificant on the basis of size, emissions or production rate. Note; insignificant activities are only valid for 20.2.70 NMAC permitting actions.
- F. **"Malfunction"** for the requirements under 20.2.7 NMAC, means any sudden and unavoidable failure of air pollution control equipment or process equipment beyond the control of the owner or operator, including malfunction during startup or shutdown. A failure that is caused entirely or in part by poor maintenance, careless operation, or any other preventable equipment breakdown shall not be considered a malfunction. (20.2.7.7.E NMAC)
- G. **"Natural Gas"** is defined as a naturally occurring fluid mixture of hydrocarbons that contains 20.0 grains or less of total sulfur per 100 standard cubic feet (SCF) and is either composed of at least 70% methane by volume or has a gross calorific value of between 950 and 1100 Btu per standard cubic foot. (40 CFR 60.631)

- H. **“Natural Gas Liquids”** means the hydrocarbons, such as ethane, propane, butane, and pentane, that are extracted from field gas. (40 CFR 60.631)
- I. **“National Ambient air Quality Standards”** means, unless otherwise modified, the primary (health-related) and secondary (welfare-based) federal ambient air quality standards promulgated by the US EPA pursuant to Section 109 of the Federal Act.
- J. **“Night”** is the time period between sunset and sunrise, as defined by the Astronomical Applications Department of the U.S. Naval Observatory. (Data for one day or a table of sunrise/sunset for an entire year can be obtained at <http://aa.usno.navy.mil/>. Alternatively, these times can be obtained from a Farmer’s Almanac or from <http://www.almanac.com/rise/>).
- K. **“Night Operation or Operation at Night”** is operating a source of emissions at night.
- L. **“NO₂”** or "Nitrogen dioxide" means the chemical compound containing one atom of nitrogen and two atoms of oxygen, for the purposes of ambient determinations. The term "**nitrogen dioxide**," for the purposes of stack emissions monitoring, shall include nitrogen dioxide (the chemical compound containing one atom of nitrogen and two atoms of oxygen), nitric oxide (the chemical compound containing one atom of nitrogen and one atom of oxygen), and other oxides of nitrogen which may test as nitrogen dioxide and is sometimes referred to as NO_x or NO₂. (20.2.2 NMAC)
- M. **“NO_x”** see NO₂
- N. **“Paved Road”** is a road with a permanent solid surface that can be swept essentially free of dust or other material to reduce air re-entrainment of particulate matter. To the extent these surfaces remain solid and contiguous they qualify as paved roads: concrete, asphalt, chip seal, recycled asphalt and other surfaces approved by the Department in writing.
- O. **“Potential Emission Rate”** means the emission rate of a source at its maximum capacity to emit a regulated air contaminant under its physical and operational design, provided any physical or operational limitation on the capacity of the source to emit a regulated air contaminant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its physical and operational design only if the limitation or the effect it would have on emissions is enforceable by the department pursuant to the Air Quality Control Act or the federal Act.
- P. **“Restricted Area”** is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with a steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.

- Q. **"Shutdown"** for requirements under 20.2.72 NMAC, means the cessation of operation of any air pollution control equipment, process equipment or process for any purpose, except routine phasing out of batch process units.
- R. **"SSM"** for requirements under 20.2.7 NMAC, means routine or predictable startup, shutdown, or scheduled maintenance.
 - (1) **"Shutdown"** for requirements under 20.2.7 NMAC, means the cessation of operation of any air pollution control equipment or process equipment.
 - (2) **"Startup"** for requirements under 20.2.7 NMAC, means the setting into operation of any air pollution control equipment or process equipment.
- S. **"Startup"** for requirements under 20.2.72 NMAC, means the setting into operation of any air pollution control equipment, process equipment or process for any purpose, except routine phasing in of batch process units.

C102 Acronyms

2SLB	2-stroke lean burn
4SLB	4-stroke lean burn
4SRB	4-stroke rich burn
acfm	actual cubic feet per minute
AFR	air fuel ratio
AP-42	EPA Air Pollutant Emission Factors
AQB	Air Quality Bureau
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CAA	Clean Air Act of 1970 and 1990 Amendments
CEM	continuous emissions monitoring
cfh	cubic feet per hour
cfm	cubic feet per minute
CFR	Code of Federal Regulation
CI	compression ignition
CO	carbon monoxides
COMS	continuous opacity monitoring system
EIB	Environmental Improvement Board
EPA	United States Environmental Protection Agency
gr/100 cf	grains per one hundred cubic feet
gr/dscf	grains per dry standard cubic foot
GRI	Gas Research Institute
HAP	hazardous air pollutant
hp	horsepower
H ₂ S	hydrogen sulfide
IC	internal combustion
KW/hr	kilowatts per hour

lb/hr	pounds per hour
lb/MMBtu	pounds per million British thermal unit
MACT	Maximum Achievable Control Technology
MMcf/hr	million cubic feet per hour
MMscf	million standard cubic feet
N/A	not applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NG	natural gas
NGL	natural gas liquids
NMAAQS	New Mexico Ambient Air Quality Standards
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMSA	New Mexico Statues Annotated
NO _x	nitrogen oxides
NSCR	non-selective catalytic reduction
NSPS	New Source Performance Standard
NSR	New Source Review
PEM	parametric emissions monitoring
PM	particulate matter (equivalent to TSP, total suspended particulate)
PM ₁₀	particulate matter 10 microns and less in diameter
PM _{2.5}	particulate matter 2.5 microns and less in diameter
pph	pounds per hour
ppmv	parts per million by volume
PSD	Prevention of Significant Deterioration
RATA	Relative Accuracy Test Assessment
RICE	reciprocating internal combustion engine
rpm	revolutions per minute
scfm	standard cubic feet per minute
SI	spark ignition
SO ₂	sulfur dioxide
SSM	Startup Shutdown Maintenance (see SSM definition)
TAP	Toxic Air Pollutant
TBD	to be determined
THC	total hydrocarbons
TSP	Total Suspended Particulates
tpy	tons per year
ULSD	ultra low sulfur diesel
USEPA	United States Environmental Protection Agency
UTM	Universal Transverse Mercator Coordinate system
UTMH	Universal Transverse Mercator Horizontal
UTMV	Universal Transverse Mercator Vertical
VHAP	volatile hazardous air pollutant
VOC	volatile organic compounds