

PROPOSED as of December 15, 2022

Statement of Basis - Narrative

Title V

Type of Permit Action: New Title V permit

Facility: **Maverick Compressor Station**
Company: XTO Energy Inc
Permit No(s): 7565M2 and P292
Tempo/IDEA ID No.: 38149 - PRT20210001
Permit Writer: Julia Kuhn

Permit Review	Date to Enforcement: TBD	Date of Enforcement Reply: TBD
	Date to Applicant: 10/20/2022	Date of Applicant Reply: 11/4/2022
	Date to EPA: TBD	Date of EPA Reply: TBD
	Date to Supervisor: 10/13/2022, 10/20/2022, 11/15/2022	

1.0 Plant Process Description:

Field gas flows into two inlet slug catchers. The site uses natural gas engines to compress the field gas to 1200-1300 psig, including nine (9) Caterpillar 3616TA engines (ENG1-ENG9) and two (2) Caterpillar 3516J engines (ENG11-ENG12). The Caterpillar engines are equipped with oxidation catalysts to reduce CO, VOC, and formaldehyde emissions.

The high-pressure gas is then dehydrated using triethylene glycol dehydration units (DEHY1-DEHY3), each handling up to 80 MMscfd each. Flash tank vapors are routed back to mixing with the inlet gas. For up to 438 hours, flash vapors are routed to the flares (FL1 - FL3). Each dehydrator is equipped with a condenser. Condensed liquids are routed to the skim tank and any remaining gas is burned at the flares (FL1 - FL3).

Low pressure liquids generated anywhere in the system are routed to a low pressure three phase separator (LPS). Vapors from the LPS are controlled by a VRU and routed to compression. When the LPS-VRU is not operational, vapors from the LPS are routed to the flare system (FL1-FL3). From the LPS, oil at approximately 15 psig is dumped to four (4) oil storage tanks (OT1-OT4), which are controlled by the flare system (FL1-FL3). Water from the LPS flows to redundant skim tanks (SKT1/SKT2). The skim tanks are arranged as a redundant system in which one unit can be used if another is down for unforeseen circumstances. Water is then dumped to two (2) water tanks (WT1-WT2).

Any residual oil flows from the skim tanks into the oil storage tanks. The oil from the oil storage tanks are then pumped back into the high pressure three phase separator (HPS), to be transferred offsite via pipeline. Vapors from the water storage tanks and skim tanks are also controlled by the flare system (FL1-FL3). Oil can be trucked offsite or pumped offsite via pipeline, water is transferred offsite via pipeline to saltwater disposal (SWD).

High pressure liquids generated anywhere in the system are routed to high pressure three phase separator (HPS). Vapors from the high-pressure separator are routed back to the inlet slug catchers. From the HPS, liquid hydrocarbons at approximately 400 psig are transferred offsite via pipeline

pipeline. Water from the HPS is transferred offsite via pipeline to SWD.

The flare system (FL1-FL3) is also used to flare gas in the event of an emergency.

2.0 Description of this Modification:

This application is submitted under section 20.2.70.200.A of the New Mexico Administrative Code (NMAC) to obtain an operating permit. The Maverick Compressor Station is a typical compressor station with natural gas engines, dehydration, storage tanks, and flares. The TV operating permit incorporates the most recent New Source Review (NSR) Permit 7565M2, issued on February 11, 2022. This permit also incorporates 20.2.50 NMAC Ozone Precursor (effective date 8/5/22) conditions.

3.0 Source Determination:

1. The emission sources evaluated include Maverick Compressor Station.

2. Single Source Analysis:

- A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? Yes
- B. Common Ownership or Control: Are the facilities under common ownership or control? Yes
- C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes

3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? Yes

4.0 PSD Applicability:

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

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

5.0 History (In descending chronological order, showing NSR and TV): *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
P292*	TBD	Title V - New	This application is submitted under section 20.2.70.200.A of the New Mexico Administrative Code (NMAC) to obtain an operating permit. The TV operating permit incorporates the most recent New Source Review (NSR) Permit 7565M2, issued on February 11, 2022.

5.0 History (In descending chronological order, showing NSR and TV): *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
7565-M2	2/11/2022	Significant Revision	Revision of emission factors, removal & addition of some equipment, increase of tank throughput and steady state flaring. See detailed information on the previous page.
7565-M1	02/06/2019	Significant Revision	With this revision, XTO plans to increase gas throughput and replace many of the engines previously permitted. Additionally, the dehydration systems will be modified, the VRU and VRT removed, a low-pressure separator (LPS) added, and a Caterpillar 3306 TA (203 hp) added.
7565	03/07/2018	NSR - New	Initial issuance

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

7.0 Compliance Testing:

Unit No.	Compliance Test	Test Dates
ENG1, ENG2, ENG3, ENG5, ENG11, ENG12 ENG6, ENG4	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	9/14/20 – 9/17/20 3/9/21 – 3/19/21 3/2/22 – 3/8/22
ENG6, ENG4	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	12/7/20 3/15/21 3/7/22 – 3/8/22

8.0 Startup and Shutdown:

- A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? Yes
- B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes
- C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes
- D. Does the facility have emissions due to routine or predictable startup, shutdown, and maintenance? If so, have all emissions from startup, shutdown, and scheduled maintenance operations been permitted? Yes.

9.0 Compliance and Enforcement Status: Per C&E email received on June 26, 2022. *“There is no outstanding notice of violation and no settlement agreement for which all actions have not been completed. No compliance plan needs to be placed in the Title V Permit.”*

10.0 Modeling:

The Modeling Report corresponding to NSR permit 7565M2 was completed on June 7, 2021 by Eric Peters. The following types of emission sources are included in the project: flares, glycol regenerator reboilers, haul roads, and natural gas compressor engines.

Modeling Assumptions: The facility operates continuously. Maximum flare rate can be distributed between three flares.

Conclusion:

This modeling analysis demonstrates that operation of the facility described in this report neither causes nor contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for CO, NO2, PM10, PM2.5, and SO2; NMAAQs for CO, NO2, and SO2; and Class I and Class II PSD increments for NO2, PM10, PM2.5, and SO2.

Action: The permit can be issued based on this modeling analysis.

11.0 State Regulatory Analysis(NMAC/AQCR):

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes, Always	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	No for TV	Entire Facility	Title V: 20.2.3.9 NMAC, LIMITATION OF APPLICABILITY TO 20.2.70 NMAC. The requirements of NMAAQs are not applicable requirements under 20.2.70 NMAC, as defined by 20.2.3.9 NMAC, 20.2.3.9 NMAC does not limit the applicability of this part to sources required to obtain a permit under the minor NSR regulation, 20.2.72 NMAC, nor does it limit which terms and conditions of NSR permits issued pursuant to 20.2.72 NMAC are applicable requirements in a Title V permit.
2.7	Excess Emissions	Yes, Always	Entire Facility	Applies to all facilities' sources
2.38	Hydrocarbon Storage Facilities	Yes	OT1-4	This regulation could applies to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.50	Oil and Gas Sector - Ozone Precursor Pollutants	Yes	RICE units ENG1-9, ENG11-12; DEHY1-3; FUG; LOAD; OT1-4; Natural Gas Driven Pneumatic Controllers and Pumps; Pig Launching and Receiving; and Compressor Seals, Control Devices (flares, condensers, and reboilers)	<p>20.2.50.113 NMAC – Engines and Turbines. The natural gas-fired spark ignition engines (ENG1-9 and ENG11-12) and are subject to the applicable requirements of this subpart.</p> <p>20.2.50.114 NMAC – Compressor Seals. Each of the eleven reciprocating compressors will comply with applicable wet seal fluid degassing system emissions control requirements and applicable rod packing replacement requirements.</p> <p>20.2.50.115 NMAC – Control Devices and Closed Vent Systems are not subject. The dehydrators and tanks are controlled to the 98% Part 50 control efficiency.</p> <p>20.2.50.116 NMAC – Equipment Leaks and Fugitive Monitoring The piping and equipment components at the facility are subject to the applicable audio, visual, and olfactory (AVO) inspections; EPA M21 or optical gas imaging (OGI) inspections; and leak repair and replacement requirements of this subpart.</p> <p>20.2.50.118 NMAC – Glycol Dehydrators The glycol dehydrators (DEHY1-3) have a PTE of ≥ 2 tpy VOC and are subject to the requirements of this subpart.</p> <p>20.2.50.119 NMAC – Heaters The fuel line heater (HTR1-3) and the glycol regenerator reboilers (RB1-3) are natural gas-fired heaters with a rated heat input < 20 MMBtu/hr; therefore, they are not subject to the requirements of this subpart.</p> <p>20.2.50.120 NMAC – Hydrocarbon Liquid Transfers The oil/condensate truck loading (LOAD) is subject to the requirements of this subpart except for facilities meeting an exemptions at 20.2.50.120.A(1)-(3) NMAC.</p> <p>20.2.50.121 NMAC – Pig Launching and Receiving Individual pipeline pig launcher and receiver operations with PTE ≥ 1 tpy VOC located within the property boundary and under common ownership and control is subject to the requirements of this subpart.</p> <p>20.2.50.122 NMAC – Pneumatic Controllers and Pumps Natural gas-driven pneumatic controllers or pumps are subject to the requirements of this subpart.</p> <p>20.2.50.112 (&115(b)):Control devices (condensers 1-3 and reboilers 1-3)</p>

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.50 (continued)				Note future applicability: determination to be made concerning demonstration of compliance with Part 50 for the dehydrator still vents and the tanks.
2.61	Smoke and Visible Emissions	Yes	FL1-3, RB1-3, ENG1-9, ENG11-12, HTR1	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC).
2.70	Operating Permits	Yes	Entire Facility	The source is a Title V Major Source as defined at 20.2.70.7 NMAC. The facility's potential to emit (PTE) is 100 tpy or more of any regulated air pollutant other than HAPs; and/or a HAPs PTE of 10 tpy or more for a single HAP resulting in the facility's classification as being a major source.
2.71	Operating Permit Fees	Yes	Entire Facility	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Yes	Entire Facility	NSR Permits are the applicable requirement, including 20.2.72 NMAC. This facility is subject to 20.2.72 NMAC and NSR Permit 7565M2.
2.73	NOI & Emissions Inventory Requirements	Yes, Always	Entire Facility	Applicable to all facilities that require a permit. PER > 10 tpy for a regulated air contaminant.
2.74	Permits-Prevention of Significant Deterioration	No	Entire Facility	The facility is not a major PSD site.
2.75	Construction Permit Fees	No	Entire Facility	No, in accordance with 20.2.75.11.E an annual NSR enforcement and compliance fee shall not apply to sources subject to 20.2.71 NMAC.
2.77	New Source Performance Standards	Yes	See Sources subject to 40 CFR 60	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60. This is a stationary source which is subject to the requirements of 40 CFR Part 60, Subparts A, OOOOa, and JJJJ.
2.78	Emissions Standards for HAPs	No	See Sources subject to 40 CFR 61	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61. No units are subject to the subparts found in 40 CFR 61.
2.79	Permits Nonattainment Areas	No	NA	This facility is not located in, not does it affect, a nonattainment area.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.82	MACT Standards for Source Categories of HAPs	Yes	See sources subject to 40 CFR 63	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63. HH and ZZZZ

12.0 Federal Regulatory Analysis:

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Yes	Entire Facility	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.
NSPS Subpart A (40 CFR 60)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 60	Applies if any other subpart applies. Subparts JJJJ and OOOOa apply.
40 CFR Part 60 Subpart IIII (Quad-I)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	No	NA	(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Yes	ENG1-9, ENG11-12 TBD	The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of section 60.4230. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. Units ENG1-ENG9 are all 4SLB with 5,000 hp and constructed after July 1, 2007. Units ENG11-ENG12 are 4SLB with 1,380 hp and constructed after July 1, 2007. These units are all subject to this subpart. Applicability determination will be made for Units ENG7-ENG9 upon installation.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				Per §60.4230(a)(4), Units ENG1-ENG6 & ENG11-ENG12 are subject: Owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured: (i) On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 HP. All units are subject to emission limitations per Table 1 in the subpart.
NSPS 40 CFR Part 60 Subpart OOOO (Quad -O)	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	No	NA	<p>The rule applies to “affected” facilities that are constructed, modified, or reconstructed after Aug 23, 2011 (40 CFR 60.5365): gas wells, including fractured and hydraulically refractured wells, centrifugal compressors, reciprocating compressors, pneumatic controllers, certain equipment at natural gas processing plants, sweetening units at natural gas processing plants, and storage vessels.</p> <p>The site was constructed after 9/18/15. See NSPS OOOOa discussion below.</p>
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	Yes	ENG1-ENG9; ENG11-ENG12; FUG	<p>The site is subject to leak monitoring from fugitive components per 60.5365a(j) and will comply with 60.5397a.</p> <p>The site uses low-bleed pneumatic controllers which are not applicable per 60.5365a(d)(1).</p> <p>The compressors associated with ENG1-ENG9 and ENG11-ENG12 are reciprocating compressor engines and will comply with 60.5385a.</p> <p>The storage tanks were constructed after the applicability date of the rule; however, tank emissions are limited by permit to less than 6 tpy. The regulation is not applicable to the storage tanks per 60.5365a(e). The gun barrels are not storage tanks.</p>
NESHAP Subpart A (40 CFR 61)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 61	<p>Applies if any other subpart applies.</p> <p>No units are subject to the subparts found in 40 CFR 61.</p>
MACT	General	Yes	See	Applies if any other subpart applies.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Subpart A (40 CFR 63)	Provisions		sources subject to a Subpart in 40 CFR 63	Subparts HH and ZZZZ apply.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	DEHY1-3	<p>The facility is a natural gas production field facility, located prior to the point of custody transfer, under definitions in 63.761. This facility is Subject to the requirements of 40 CFR 63 Subpart HH.</p> <p>The definition of Major Source in 63.761 provides that only HAP emissions from glycol dehydration units and storage vessels shall be aggregated for a major source determination.</p> <p>AREA SOURCE (Minor for HAPs): given the definitions above, this facility is an area source under HH.</p> <p>The facility contains affected sources (TEG glycol dehydrators, 63.760(b)(2)). The dehydrators process more than 3 mmscf/d; however, since benzene emissions are less than one ton per year (63.764(e)(1)), the dehydrators are exempt, and the records of the determination must be maintained as required in §63.774(d)(1).</p>
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	ENG1-ENG9; ENG11-ENG12	<p>A facility is subject to this subpart if they own or operate a stationary RICE at a major OR area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.</p> <p>The site is a major source of HAP.</p> <p>ENG1-ENG9 and ENG11-ENG12 engines are 4SLB RICE engines with an engine rating greater than 500 HP subject to the limitations in 63.6600(b)-Table 2a.2.</p> <p>After acquisition of Units ENG7-ENG9, a determination of applicability will be made for each engine.</p>
40 CFR 64	Compliance Assurance Monitoring	No	NA	<p>The facility is not subject to CAM.</p> <p>The Low Pressure Separator (Unit LPS) at the station requires control devices (VRU1-2). The VOC emissions are directed to VRU1 or VRU2 (back-up) in closed loop system. During the 10% VRU downtime the emissions are directed to the flares for combustion. The emissions do not meet the major source</p>

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				<p>threshold, and therefore, the LPS is controlled by VRU1-2 is <u>not subject to Part 64</u>.</p> <p>The facility contains affected sources: glycol dehydrators and condensate storage tanks (63.760(b)(2)). The facility is an area source of HAPs as defined by Subpart HH. The dehydrator flash tank vapors are captured and routed back to the inlet. Routing back to process does not meet the 40 CFR 64 definition of control device, therefore, the emissions from DEHY1-3 are <u>not subject to CAM</u>,</p> <p>Emissions from the condensate tanks are not included in the HAP major source determination as the tanks do not have an actual annual average hydrocarbon liquid throughput equal to or greater than 79,500 liters per day (500 barrels per day).</p> <p>Units OT1-4 are equipped with a control device (FL1, 2, 3) and the uncontrolled emissions for this unit are above the Title V major source thresholds. However, the condensate tanks <u>TO1-4 are exempt from Part 64</u> because they are subject to VOC emission limitations in Subpart OOOOa (promulgated after 1990).</p> <p><u>ENG1-9, ENG11-12 are exempt from Part 64</u> because they are subject to NOx, CO, and VOC emissions limitations in Subpart JJJ (promulgated after 1990).</p>
40 CFR 68	Chemical Accident Prevention	No	NA	The facility does not store any chemicals above the threshold quantity of a regulated substance in a process, as determined under §68.115 Threshold determination and 68.130 List of substances.
40 CFR 70	Title V- State Operating Permit Programs	No	NA	Operating Permit Program – is not applicable – New Mexico State has full delegated authority and Title V is administered under 20.2.70 NMAC.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No	NA	The facility does not service, maintain, or repair equipment containing refrigerants.

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

Title V - Insignificant Activities (Dated March 24, 2005) as defined by 20.2.70.7.Q NMAC:

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction ²
ROAD	Haul Road Emissions	N/A	N/A	N/A	20.2.72.202.B.5	N/A
			N/A	N/A	20.2.72.202.B.5	N/A

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

- A. Date of Monitoring Protocol used for IC Engines: December 11, 2019
- B. Date of Monitoring Protocol used for Tanks & Loading: September 19, 2017
- C. Date of Monitoring Protocol used for Glycol Dehydrators: February 12, 2018
- D. Date of Monitoring Protocol used for Boilers/Heaters: protocol August 18, 2017
- E. Date of Monitoring Protocol used for Fugitives: protocol February 11, 2022
- F. Date of NSR Part A. Permit template is June 28, 2021
- G. NMAC 50: Ozone Precursor Pollutants: added several conditions for engines, dehydrators, tanks, loading, natural gas driven pneumatic controllers and pumps, pig launching and receiving, compressor seals, fugitive units, and control devices subject to 20.2.50 NMAC

15.0 For Title V action: Cross Reference Table between NSR Permit 7565M2 and TV Permit P292. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:

Changed by TV*	NSR Condition #	TV Section #
	A100 Introduction	A100 Introduction
	A101 Permit Duration	A101 Permit Duration
	A102 Facility Description	A102 Facility Description
	Table 102.A Total Potential Emissions	Table 102.A Total Potential Emissions
XX	A103 Facility: Applicable Regulations	A103 Facility: Applicable Regulations – Added Part 50
XX	A104 Facility: Regulated Sources	A104 Facility: Regulated Sources – Added Part 50 Units
	A105 Facility: Control Equipment	A105 Facility: Control Equipment
XX	(before effective date of Part 50)	A105.B: 20.2.50 NMAC Control Devices (flares, condensers, reboilers)
	A106 Facility: Allowable Emissions	A106 Facility: Allowable Emissions
	Table 106.B Subpart JJJ Emission Limits	Table 106.B Subpart JJJ Emission Limits
XX	(before effective date of Part 50)	Table 106.C Part 50 Engine Limits
XX	(before effective date of Part 50)	Table 106.D Part 50 Engine Limits
	A107 Facility: Allowable SSM	A107 Facility: Allowable SSM
	A107.C SSM – Compressor Venting from ENG1-9, ENG11-12	A107.C SSM – Compressor Venting from ENG1-9, ENG11-12
	A107.D SSM Flaring Emissions	A107.D SSM Flaring Emissions

Changed by TV*	NSR Condition #	TV Section #
	A107.E Malfunction	A107.E Malfunction
	A107.F DEHY1-3 SSM	A107.F DEHY1-3 SSM
	A108 Facility: Hours of Operations	A108 Facility: Hours of Operations
XX	A109 Facility: Reporting Schedules NR for NSR	A109 Facility: Reporting Schedules
XX		A109.A TV Semi-Annual
XX		A109.B TV ACC
		A109.C NSR Quarterly Reporting
	A110 Facility: Fuel Sulfur Requirements	A110 Facility: Fuel Sulfur Requirements
	A201.A Engines: Periodic Testing (Units ENG1-9, ENG11-12)	A201.A Engines: Periodic Testing (Units ENG1-9, ENG11-12)
	A201.B Engines: Initial Testing (Units ENG7-9)	A201.B Engines: Initial Testing (Units ENG7-9)
	A201.C Catalytic Convertor Operations (Units ENG1-9, ENG11-12)	A201.C Catalytic Convertor Operations (Units ENG1-9, ENG11-12)
	A201.D/E MACT JJJ (Units ENG1-9, ENG11-12)	A201.D/E MACT JJJ (Units ENG1-9, ENG11-12)
	A201.F/G MACT ZZZZ (Units ENG1-9, ENG11-12)	A201.F/G MACT ZZZZ (Units ENG1-9, ENG11-12)
XX	(before effective date of Part 50)	A201.H Part 50 engine condition
XX	(before effective date of Part 50)	A201.I Part 50 compressor seal condition
	A202.A Glycol Dehydrator Gas Analysis (Units DEHY1-3)	A202.A Glycol Dehydrator Gas Analysis (Units DEHY1-3)
	A202.B Glycol Dehydrator Pump Circulation Rate (Units DEHY1-3)	A202.B Glycol Dehydrator Pump Circulation Rate (Units DEHY1-3)
	A202.C Glycol Dehydrator Control Device Inspection (Units FL1-3, COND1-3)	A202.C Glycol Dehydrator Control Device Inspection (Units FL1-3, COND1-3)
	A202.D Flares (Units FL1, FL2, FL3): Control Device for BTEX Condensers (COND1-COND3)	A202.D Flares (Units FL1, FL2, FL3): Control Device for BTEX Condensers (COND1-COND3)
	A202.E 40 CFR 63, Subpart HH (Units DEHY1, DEHY2, DEHY3)	A202.E 40 CFR 63, Subpart HH (Units DEHY1, DEHY2, DEHY3)
XX	(before effective date of Part 50)	A202.E Part 50 dehy condition
	A203.A Tanks Throughput (Units OT1-4)	A203.A Tanks Throughput (Units OT1-4)
	A203.B Skim Tank Separator Throughput (Primary Unit SKT1 or Backup Unit SKT2)	A203.B Skim Tank Separator Throughput (Primary Unit SKT1 or Backup Unit SKT2)
	A203.C Flares (Units FL1, FL2, FL3): Control Device for Condensate Tanks (Units OT1-4), Produced Water Tanks (WT1, WT2), and Skim Tanks (SKT1, SKT2)	A203.C Flares (Units FL1, FL2, FL3): Control Device for Condensate Tanks (Units OT1-4), Produced Water Tanks (WT1, WT2), and Skim Tanks (SKT1, SKT2)
	A203.D Low Pressure Separator (LPS) and Control Devices (Vapor Recovery Units VRU1, VRU2 and Flares FL1, FL2, FL3)	A203.D Low Pressure Separator (LPS) and Control Devices (Vapor Recovery Units VRU1, VRU2 and Flares FL1, FL2, FL3)
	A203.B Truck Loading (Unit X) E.Truck	A203.B Truck Loading (Unit X) E.Truck Loading –

Changed by TV*	NSR Condition #	TV Section #
	Loading – Condensate Oil Loadout (Unit LOAD)	Condensate Oil Loadout (Unit LOAD)
	A203.F 20.2.38 NMAC, Hydrocarbon Storage Facilities (Units OT1-4)	A203.F 20.2.38 NMAC, Hydrocarbon Storage Facilities (Units OT1-4)
XX	(before effective date of Part 50)	A203.G Part 50 load condition
XX	(before effective date of Part 50)	A203.H Part 50 tank condition
	A204.A Heater Operational Inspection (Units RB1, RB2, RB3)	A204.A Heater Operational Inspection (Units RB1, RB2, RB3)
	A204.B Units RB1-RB3: See Conditions A110 and A111. Compliance with the emission limits in Table 106.A is demonstrated by complying with those conditions	A204.B Units RB1-RB3: See Conditions A110 and A111. Compliance with the emission limits in Table 106.A is demonstrated by complying with those conditions
	A205 Turbines – Not Required	A205 Turbines – Not Required
	A206.A Flares Operation (Unit X)	A206.A Flare Flame & Visible Emissions (20.2.61 NMAC) (Units FL1, FL2, and FL3)
	A206.B Visible Emissions (Unit X)	A206.B Flare Gas Flow Monitoring and Gas Analysis (Units FL1, FL2, FL3)
	A206.C Flare Destruction Efficiency (Unit X)	A206.C Flare Emissions Calculation (Units FL1, FL2, and FL3)
	A206.D Flare Parametric Monitoring for Low Pressure Sides - Low Pressure Side Pilots and Vapors from Condensate Tanks (Units FL1, FL2, and FL3)	A206.D Flare Parametric Monitoring for Low Pressure Sides - Low Pressure Side Pilots and Vapors from Condensate Tanks (Units FL1, FL2, and FL3)
XX	(before effective date of Part 50)	A206.E: Control device - Flares 20.2.50 NMAC
	A207 Sulfur Recovery Unit - Not Required	A207 Sulfur Recovery Unit - Not Required
	A208 Amine Unit - Not Required	A208 Amine Unit - Not Required
XX	A209.A Fugitives NSPS OOOOa (Unit FUG)	A209.A Fugitives NSPS OOOOa (Unit FUG) – Updated
XX	A209. B 40 CFR 60, Subpart OOOOa – (Reciprocating Compressors associated with Units ENG1-9, ENG11-12) - Updated	A209. B 40 CFR 60, Subpart OOOOa – (Reciprocating Compressors associated with Units ENG1-9, ENG11-12) - Updated
XX	(before effective date of Part 50)	A209.C Part 50 Equipment Leaks/Fugitive Emission Condition
XX	(before effective date of Part 50)	A209.D Part 50 Pneumatic Controllers/Pumps Condition
XX	(before effective date of Part 50)	A209.E Pig Launcher/Launchers Condition
XX	Part B General Conditions	Part B General Conditions, entire Section updated
	Part C Miscellaneous	Part C Miscellaneous

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

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

- A. The DEHY1-3, LPS, and OT1-4 are not subject to CAM. Please refer to Section 12, 40 CFR 64 of Statement of basis for detailed information.
- B. As of August 5, 2022, the facility is subject to 20.2.50 NMAC. Multiple conditions have been added to the TV Permit.
- C. Fugitive emissions are regulated but no allowables have been established because the emissions are under 25 tpy.
- D. Emissions associated with LOAD2 are below 1 tpy (0.09 tpy) and the water truck loading is not regulated at this time.
- E. Please refer to Section A109.A and A109.B for Reporting Schedules under 20.2.70.302.E.