

Data Base Summary (Statement of Basis)

Title V (TV) Permit

Type of Permit Action: Permit Minor Modification.

PSD or Not	Minor or Title V	Portable or Not
Minor (not PSD)	Major-Title V	Stationary

Facility: Jal No3 Gas Plant
Company: ETC Texas Pipeline LTD
Facility Type: O&G-Gas Plant
Permit No. (NSR) 1092-M10
Operating Permit No. (TV) P090R3M1
Agency Interest No. 569 - PRT20230001
AIRS ID No. 350250008
SIC CODE: 1321: Natural gas liquids
Permit Writer: Joseph Kimbrell

Application Notarized Date: February 14, 2023
Receive Date: February 17, 2023
Timeliness of TV Application: NA
Ruled Incomplete: NR
Ruled Complete: February 27, 2023
PN sent to Field Office: 3/9/23
Public involvement Plan (PIP): NR
PSD APP. Sent to EPA: NR
Public Notice Date & Newspaper: March 9, 2023, Hobbs-News Sun
Comments Due: April 9, 2023
Analysis Review Begins: NR
Analysis Review Ends: NR
Public Hearing: NR
Proposed Permit to EPA Acknowledged: March 9, 2023
Permit Due: May 28, 2023
Permit Issued: TBD
PSD Permit to EPA: NR

Facility Location: This facility is located approximately 4 miles north northeast of Jal, New Mexico in Lea County.
UTM Zone: 13 ; **Datum:** WGS84
UTM Easting: 672129 meters
UTM Northing: 3561167 meters
Elevation: 3260 ft
County: Lea
In a Sensitive Area: No. The facility is located at: S-33, R-37E, & T-24S
Contact Name: Alena Miro
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Contact Address: 2564 Pecos Highway

Carlsbad, NM 88220

Consultant Name: Adam Erenstein, Trinity Consultants
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Consultant Address: 9400 Holly Ave NE Building 3 Suite 300
Albuquerque, NM 87122

Title V Affected Program* Notification:

Affected Program	Distance	Units	Date Letter Sent
Class I - Carlsbad Caverns National Park	112.6	km	Not Required
State - Texas	10.1	km	2/27/2023

*As defined by 20.2.70.7.B: All States, local air pollution control programs, and Indian Tribes and Pueblos, that are within 50 miles (80.5 km) of the source.

Part II – Facility Specifications

Table 102.A: Total Pollutant Emissions from Entire Facility:

Pollutant	Emissions (tons per year)	Emission Type	Change in Emission since Permit P090R3
Nitrogen Dioxide	105.5	Allowable	No Change (NC)
Carbon Monoxide	88.2	Allowable	NC
Volatile Organic Compounds (VOC)	163.6	Allowable	NC
Sulfur Dioxide	60.6	Allowable	NC
Particulate Matter (10 microns or less)	7.2	Allowable	NC
Particulate Matter (2.5 microns or less)	7.2	Allowable	NC
Carbon Dioxide (equivalent)	224846	Potential	NC
Hydrogen sulfide (NMAAQ)	0.19	Allowable	NC

Note: Total Potential Pollutant Emissions in Table 102.A, may include fugitive emissions; routine or predictable, startup, shutdown, and maintenance emissions (SSM); and permitted malfunction allowances if these are a sources of regulated air pollutants from this facility.

Table 102.B: Total Potential Hazardous Air Pollutants (HAPs)* and State Toxic Air Pollutants (TAPs)

Pollutant	Emissions (tons per year)	Emission Type	Change in Emission since Permit P090R3
Acrolein	3.0	Potential	NC
Formaldehyde	6.8	Potential	NC
Total HAP	12.1	Potential	NC

* HAP emissions are included in the Table 102.A VOC emissions total.

** Total HAP emissions may not agree with the sum of individual HAPs because only individual HAPs emitted at a rate greater than 1.0 ton per year are listed in Table 102.B.

Air Pollution Control Devices:

Unit # (Subject Item ID)	SI Description	Primary	Secondary
C1 (EQPT67)	Caterpillar G3612	Catalytic Converter	
C2 (EQPT68)	Caterpillar G3612	Catalytic Converter	
C3 (EQPT69)	Caterpillar G3612	Catalytic Converter	
C4 (EQPT70)	Caterpillar G3612	Catalytic Converter	
C5 (EQPT73)	Caterpillar G3606	Catalytic Converter	
C6 (EQPT74)	Caterpillar G3606	Catalytic Converter	
DR2 (EQPT71)	Dehydrator Regenerator with Condenser	Flare	
FUG1 (RPNT26)	Fugitives	Flare	
FUG2 (RPNT29)	Fugitives	Flare	

Equipment Specifications (Active/Alternative): No equipment was added during TV Minor Modification P090R3M1

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
10F EQPT40	Process Flare	John Zink	not applicable	not applicable	01-JAN-50		75 MM SCF/d / 75 MM SCF/d	75 MM SCF/d / 75 MM SCF/d	Active	Inlet Flare-pilot
10F-SSM EQPT72	Process Flare	John Zink	not applicable	not applicable	01-JAN-50		75 MM SCF/d / 75 MM SCF/d	75 MM SCF/d / 75 MM SCF/d	Active	Inlet Flare-SSM, routine inlet blow downs (flare 10F)
12H EQPT76	Heater Treater/Stack Pak	Not applicable	Not applicable	Not applicable			28 MM BTU/h / 28 MM BTU/h	/	Active	Regeneration gas heter - Amine Sweetening Unit/Acid Gas Injection System

Equipment Specifications (Active/Alternative): No equipment was added during TV Minor Modification P090R3M1

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
14H EQPT77	Heater Treater/Stack Pak	Not applicable	Not applicable	Not applicable			10 MM BTU/h / 10 MM BTU/h	/	Active	Condensate Stabilizer Heater
8F EQPT42	Process Flare	John Zink	not applicable	not applicable	01-JAN-71		10 MM SCF/d / 10 MM SCF/d	10 MM SCF/d / 10 MM SCF/d	Active	Gas Plant Flare
9F EQPT41	Process Flare	John Zink	not applicable	not applicable	01-JAN-93		2.9 MM SCF/d / 2.9 MM SCF/d	2.9 MM SCF/d / 2.9 MM SCF/d	Active	Treatment Flare
C1 EQPT67	Internal combustion engine	Caterpillar G3612	G3612	1YG00065	12-APR-19	07-AUG-18	3550 hp / 3550 hp	3550 hp / 1000 rpm	Active	Caterpillar G3612
C2 EQPT68	Internal combustion engine	Caterpillar G3612	G3612	BKE00660	01-JUL-17	01-AUG-13	3550 hp / 3550 hp	3550 hp / 1000 rpm	Active	Caterpillar G3612
C3 EQPT69	Internal combustion engine	Caterpillar G3612	G3612	BKE00662	01-JUL-17	01-AUG-13	3550 hp / 3550 hp	3550 hp / 1000 rpm	Active	Caterpillar G3612
C4 EQPT70	Internal combustion engine	Caterpillar G3612	G3612	BKE00659	01-JUL-17	01-AUG-13	3550 hp / 3550 hp	3550 hp / 1000 rpm	Active	Caterpillar G3612
C5 EQPT73	Internal combustion engine	Caterpillar G3606	G3606	TBD		01-JUL-10	1875 hp / 1875 hp	1875 hp / 1000 rpm	Active	Caterpillar G3606
C6 EQPT74	Internal combustion engine	Caterpillar G3606	G3606	TBD		01-JUL-10	1875 hp / 1875 hp	1875 hp / 1000 rpm	Active	Caterpillar G3606

Equipment Specifications (Active/Alternative): No equipment was added during TV Minor Modification P090R3M1

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
DR2 EQPT71	Glycol Dehy Still Vent/Flash Tank	TBD	TBD	TBD	01-JAN-59		70 MM SCF/d / 70 MM SCF/d	70 MM SCF/d / MM SCF/d	Active	Dehydrator Regenerator with Condenser
FUG1 RPNT26	Fugitives	not applicable	not applicable	not applicable			/	/	Active	Fugitives
FUG2 RPNT29	Fugitives	not applicable	not applicable	not applicable	07-OCT-05		/	/	Active	Fugitives
LOAD EQPT75	Tank - Above Ground	TBD	TBD	TBD			/	500 bbl / 7665000 gal/y	Active	Scrubber Oil Loading
Loadout RPNT32	Transfer Point	not applicable	not applicable	not applicable			/	800 bbl/d / 9198000 gal/y	Active	Tank Loading - Condensate Loadout
SSM/M RPNT30	Stack/Vent	not applicable	not applicable	not applicable	23-MAY-13		/	/	Active	Startup, Shutdown, Maintenance, Malfunction (Flares 8F, 10F)
TK-3 EQPT34	Tank - Above Ground	not applicable	not applicable	not applicable	01-JAN-70		210 bbl / 8820 gal	210 bbl / 8820 gal/y	Active	Scrubber Liquids Tank
TK-4 EQPT35	Tank - Above Ground	not applicable	not applicable	not applicable	01-JAN-70		210 bbl / 210 bbl	210 bbl / 8820 gal/y	Active	Scrubber Liquids Tank

Equipment Specifications (Active/Alternative): No equipment was added during TV Minor Modification P090R3M1

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
TK-46 EQPT54	Tank - Above Ground	not applicable	not applicable	not applicable	01-JAN-70		107 bbl / 4512 gal	107 bbl / 58658 gal/y	Active	Scrubber Liquids Tank
TK-519 EQPT62	Tank - Above Ground	TBD	TBD	TBD			/	600 bbl / 8400840 gal/y	Active	Gunbarrel
TK-519A EQPT64	Tank - Above Ground	TBD	TBD	TBD			/	500 bbl / 7665000 gal/y	Active	Wastewater Tank
TK-519C EQPT63	Tank - Above Ground	TBD	TBD	TBD			/	500 bbl / 735840 gal/y	Active	Scrubber Oil Tank

Equipment Specifications (Inactive/Retired/Removed): No equipment was removed during TV Minor Modification P090R3M1

Unit No.	Unit Type	Make	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description

Emissions: Pollutant **Permitted** (Allowable and SSM) Emissions per piece of equipment or Subject Item as represented by applicant.

No emission estimate or limits were revised during TV Minor Modification P090R3M1

Unit No.	NO _x (pph)	¹ NO _x (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)
C1 (EQPT67)	3.9	17.12	2.1	9.4	1.96	8.59		1.7		1.2				
C2 (EQPT68)	3.9	17.1	2.1	9.4	1.96	8.59		1.7		1.2				
C3 (EQPT69)	3.9	17.1	2.1	9.4	1.96	8.59		1.7		1.2				
C4 (EQPT70)	3.9	17.1	2.1	9.4	1.96	8.59		1.7		1.2				
C5 (EQPT73)	1.24	5.43	2.06	9.04	2.46	10.76		0.04		0.62				
C6 (EQPT74)	1.24	5.43	2.06	9.04	2.46	10.76		0.04		0.62				
12H (EQPT76)	2.75	12.02	2.31	10.1	0.15	0.66	0.02	0.07	0.21	0.91	0.21	0.91		
13H (EQPT79)	0.2	0.86	0.16	0.72	0.01	0.05	0.001	0.01	0.01	0.07	0.01	0.07		
14H (EQPT77)	0.98	4.29	0.82	3.61	0.05	0.24	0.01	0.03	0.07	0.33	0.07	0.33		
DR2 (EQPT71)														
8F (EQPT42)	2.08	4.12	4.15	8.22	4.31	5.07	9.1	8.52					0.097	0.09
9F (EQPT41)	0.32	1.38	0.63	2.76	4.67	20.46	9.11	39.91						
10F (EQPT40)	0.4	1.76	0.8	3.52		1.79								
10F-SSM (EQPT72)		3.52		7.03		7.92		5.31						0.1
TK-3 (EQPT34)					0.13	0.57								
TK-4 (EQPT35)					0.13	0.57								
TK-46 (EQPT54)					1.35	5.89								
Loadout (RPNT32)						29.35								
LOAD (EQPT75)					0.17	0.76								
FUG1 (RPNT26)					3.97	34.75								
FUG2 (RPNT29)					0.001	0.61								
SSM/M (RPNT30)						0.73								
Malfunctions (RPNT31)														
TOTAL														

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

- 2 Title V annual fee assessments are based on the sum of allowable tons per year emission limits in Sections A106 and A107.
- 3 Compliance with emergency flare emission limits is demonstrated by limiting combustion to pilot and/or purge gas only.
- “-” indicates the application represented emissions are not expected for this pollutant.
- “<” 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. The Department determined that allowable mass emission limits were not required for this unit and this pollutant.
- “*” indicates hourly emission limits are not appropriate for this operating situation.

Pollutant Unpermitted (Potential) Emissions (Non-regulated, without permitted emission limits)

Unit No.	NO _x (pph)	¹ NO _x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO ₂ (pph)	SO ₂ (tpy)	TSP (pph)	TSP (tpy)	PM ₁₀ (pph)	PM ₁₀ (tpy)	PM _{2.5} (pph)	PM _{2.5} (tpy)	H ₂ S (pph)	H ₂ S (tpy)
TK-519C (EQPT63)						0.1										
FUG1 (RPNT26)																
TK-519A (EQPT64)																
TK-519 (EQPT62)																
TOTAL																

Table 102.B: Total Potential Hazardous Air Pollutants (HAPs)* and State Toxic Air Pollutants (TAPs)

Pollutant	Emissions (tons per year)	Emission Type
Acrolein	3.0	Potential
Formaldehyde	6.8	Potential
Total HAP	12.1	Potential