Statement of Basis - Narrative
Title V (TV) Permit

Type of Permit Action: Permit Minor Modification

Facility: Jal No3 Gas Plant
Company: ETC Texas Pipeline LTD
Permit No(s).: 1092-M10 and P090-R3M1
Tempo/IDEA ID No.: 569 - PRT20230001
Permit Writer: Joseph Kimbrell

Permit Review	**Date to Enforcement:** NR at this time.	**Date of Enforcement Reply:** NR at this time.
	Date to Applicant: 2/27/2023	**Date of Applicant Reply:** TBD
	Date to EPA: TBD or N/A	**Date of EPA Reply:** TBD or N/A
	Date to Supervisor: 2/27/2023	

1.0 Plant Process Description:

The facility is a natural gas treating and processing plant. Natural gas is treated in amine sweetening units to remove acid gas, consisting of approximately ~18% CO_2 and ~18% H_2S, with traces of other gases. The sweetened gas is then dehydrated in a glycol dehydrator and processed to separate residue gas, primarily methane, from the liquids, including the higher carbon number hydrocarbon fractions.
Acid gas removed from the natural gas stream by the sweetening units directed to a Class II underground injection disposal well, permitted by the Oil Conservation Division (OCD).
This project will install at Jal 3 a gas treating system and compression to move the treated gas to other gas processing facilities in the Delaware Basin. The current treating and cryo processing facilities at Jal 3 will be shut down along with most of the auxiliary facilities that supported that treating and processing. A new amine unit will be installed to treat the incoming gas. The treated gas will be compressed to pipeline delivery pressure by two new compressor units. After compression, the treated gas will flow to a new glycol dehydration unit. Vapors from the still vent will be sent to a flare and vapors from the flash tank will be routed to the site's fuel system.
The condensate stabilizer system currently in operation will remain. However, the boiler that supplies the steam will be shut down and the steam heat will be replaced with a fired HMO.
Acid gas removed from the natural gas stream by the sweetening unit is directed to a new AGI unit where the acid gas is injected into the underground injection well.

2.0 Description of this Modification:

ETC Texas Pipeline, Ltd. (ETC) operates the Jal No. 3 Gas Plant in Lea County. In this minor modification ETC seeks to correct a typographical error in the current Compliance Assurance Monitoring (CAM) plan for the Acid Gas Injection (AGI) well operated at the plant. The CAM plan is shown on page A34, Table A-3 of the current Title V Operating Permit P090-R3. The current CAM plan shows the low indicator range for Indicator No. 1, Wellhead Pressure, as 700 pounds per square inch, gauge (psig). In practice, successful injection can be achieved with a low-end of the indicator range that is much lower. ETC seeks to replace the incorrect the lower end of the indicator range with the correct value of 1 psig. As required by the CAM plan, ETC monitors and records the AGI wellhead pressure daily when the AGI is operating. These records are available to the NMED on request. Pressure monitoring records for the AGI compressor discharge pressure are also available on request and demonstrate that discharge pressure is always greater than the wellhead pressure. No emissions or conditions are changed as a result of this action.

3.0 Source Determination:

1. The emission sources evaluated include Jal #3 Gas Plant.

2. Single Source Analysis:

A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? Yes

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:**

Once a source is PSD major for any single pollutant, all other pollutants, other than non-attainment pollutants, must be evaluated against Table 20.2.74.502 Significant Emission Rate for applicability regardless if that pollutant is over the 100/250 tpy threshold per 20.2.74.200(d)(1), 74.302.A and 302.B NMAC. See Section A, PSD Applicability, of the 1990 Workshop Manual for details, but keep in mind that the regulation has changed since the guidance was published.

A. The source, as determined in 3.0 above, is **an existing PSD Major Source and a PSD minor source after this modification.**
B. The project emissions for this modification are **not significant. All emissions are being reduced.**

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)
			PSD Minor Source after NSR 1092M10
P090R4	TBD	TV Renewal	Application for Title V Operating Permit 5-year renewal due not later than 3/27/2023.
P090R3M1*	TBD	TV Minor Modification (Joe Kimbrell)	ETC Texas Pipeline, Ltd. (ETC) operates the Jal No. 3 Gas Plant in Lea County. In this minor modification ETC seeks to correct a typographical error in the current Compliance Assurance Monitoring (CAM) plan for the Acid Gas Injection (AGI) well operated at the plant. The CAM plan is shown on page A34, Table A-3 of the current Title V Operating Permit P090-R3. The current CAM plan shows the low indicator range for Indicator No. 1, Wellhead Pressure, as 700 pounds per square inch, gauge (psig). In practice, successful injection can be achieved with a low-end of the indicator range that is much lower. ETC seeks to replace the incorrect the lower end of the indicator range with the correct value of 1 psig. As required by the CAM plan, ETC monitors and records the AGI wellhead pressure daily when the AGI is operating. These records are available to the NMED on request. Pressure monitoring records for the AGI compressor discharge pressure are also available on request and demonstrate that discharge pressure is always greater than the wellhead pressure. No emissions or conditions are changed as a result of this action. Also corrects SSM typo.
1092M10R1	TBD	Administrative Revision (Joe Kimbrell)	Correct typographical error in Permit 1092M10 pertaining to SSM.
1092M10*	TBD	NSR Significant Modification (Joe Kimbrell)	The proposed modification will consist of removing ten (10) natural gas compressor engines, two (2) heaters, two (2) boilers, one (1) glycol dehydrator, one (1) thermal oxidizer, and supporting equipment and adding two (2) Caterpillar 3606 engines, one (1) 28 MMBtu/hr amine system heater, one (1) glycol dehydration unit with associated reboiler and thermal oxidizer, one (1) AGI compressor, and (1) 10 MMBtu/hr condensate stabilizer heater.
1092M9	Withdrawn 4/15/2022	GCP Oil & Gas Registration	Did not qualify for a GCP Oil & Gas permit since the facility operates with Acid Gas Injection Wells, which are not mentioned as approved controlled devices in the GCP Oil & Gas Permit.
1092M8R7	11/09/2021	Administrative Revision	On August 25, 2021, ETC Texas Pipeline, Ltd (ETC) entered into the Settlement Agreement and Stipulated Final Compliance Order No. AQB 20-63 {CO) with the New Mexico Environment Department. Condition #21 of this agreement states the following: "Within 60 days of the permanent shutdown of the SRU, ETC will submit an administrative revision pursuant to 20.2.72.219.A NMAC to the NSR and Title V permits to remove authorization to operate the SRU and any monitoring, record keeping, and reporting requirements related

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)
			to operation of the SRU." To satisfy this requirement, ETC submitted the Permitting Administrative Multi-Forms requesting that unit numbers SRU and 9S and associated emissions be removed from NSR Permit No. 1092-M8R3 and Title V Permit No. P090-R3.
1092M8R6	4/26/2019	Administrative Revision	Like-kind engine replacement of Unit C1, Caterpillar G3612, serial # BKE00658 with new C1, Caterpillar G3612, serial # 1YG00065, manufacture date 8/7/2018.
1092M8R5	1/4/2019	Administrative Revision	Like-kind engine replacement of Unit S5, Superior 12SGTB, serial # 293259 with new S5, Superior 12SGTB, serial # 300349, manufacture date 12/11/1984.
P090R3	3/27/2019	TV Renewal (Joe Kimbrell)	Title V Operating Permit 5-year renewal and incorporate changes authorized by 1092-M8R2 – M8R4. Removed TSP from the emissions limit tables 106.A and 107.A since the NM State TSP Rule was repealed November 2018.
1092M8R4	9/11/2018	Administrative Revision	ETC is requesting an administrative change and a transfer of responsibility for the Air Quality Permits from ETC Field Services, LLC to ETC Texas Pipeline, Ltd.
1092M8R3	5/23/2016	Administrative Revision	This revision consists of Administrative Revision to change the company name of twenty-four (24) facilities from Regency Energy Partners, LP to Energy Transfer Company Field Services, LLC, effective May 1, 2016.
1092M8R2	09/24/2015	NSR Technical Revision	This technical revision incorporates reconstruction of the wastewater system. The new system will separate oily water and scrubber liquids via a gunbarrel tank (TK-519), Scrubber Oil Tank (TK-519C), Water Storage Tank (TK-519A), and Contingency Tank (TK-2102). The following equipment will be removed; Scrubber Oil Tank (TK-1), Scrubber Oil Tank (TK-2), Wastewater Surge Tank (TK-5), and Waste Water Tank (TK-73).
P090R2M1	12/23/2014	TV Re-opening/ Re-issuance	This reopening consists of the following changes from P090R2: • Moving Flare 9F and 10F pilot/purge emissions from Permit Table 107.A to Table 106.A. Revising the monitoring method for Flare 8F pilot/purge emissions in Condition A206.C.
1092M8R1	04/24/2015	Administrative Revision	Like-kind engine replacement for a Superior 2416 GTL, Unit No. S2 from old SN 333519 to the new SN 334799.
1092M8	08/01/2013	NSR Significant Modification	• Removing turbine Unit 3T, • Installing a set of 4 engines in its place, and • Installing a new 120.9 MMBtu/hr boiler. The applicant **netted out** for NO_x and CO_2e, so a **PSD permit was not required.**
P90R2	03/14/2014	TV Renewal	TV renewal incorporating NSR Permits 1092-M8, M7, M6

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)
1092M7	05/23/2013	NSR Significant Modification	• Revision of Startup, Shutdown, Maintenance, and Malfunction emissions • The Permittee and Owner/Operator is changed to Regency Field Services LLC, per e-mail from Clarence Rasco 5/24/13 • Addition of exempt tanks, TK-67, TK-68, TK-71, & TK-72 • Removal of exempt tank TK-46 (replaced with 1 of above) • Making tanks TK-1 and TK-2 regulated emission sources • Remove temporary boiler Unit 31Btemp • Revise condensate throughputs of pressurized tanks TK-50,TK-51, truck loading, and LOADOUT • Emissions changes from Permit 1092M6 are: -1.8 tpy of NOx, +34.6 tpy of CO, +47.6 tpy for VOC, +229.3 tpy for SOx, +1.7 tpy PM2.5, +1.7 tpy PM10, +1.7 tpy TSP, & +18.9 tpy of H_2S. **Please see file folder for more discussion details with company regarding SSM and Malfunction emission rates.**
1092M6	10/06/2011	NSR Significant Modification	Permitting of permanent Nebraska 90.9 MMBtu/h boiler. Addition of Loadout, SSM, & Malfunctions emissions. **SSM & Malfunction:** In accordance with 20.2.7.15 NMAC, SUG is applying to permit a maximum cap of 10 tpy each: NOx, CO, VOCs, and SO2 emissions, which will include both SSM and Malfunction emissions. Permitting Malfunction emissions is in accordance with AQB's guidance Implementation Guidance for Permitting SSM Emissions and Excess Emissions dated January 1, 2011. The permittee shall contemporaneously record all routine and predictable startups and shutdowns and scheduled maintenance and malfunction events. The permittee shall indicate whether the emissions resulting from Malfunctions are included in the amount allowed by this permit or whether the event is reported under 20.2.7 NMAC. Emissions changes from Permit 1092M5R4 are: +10.0 tpy of NOx, +10.0 tpy of CO, +13.7 tpy for VOC, +10.0 tpy for SOx.
1092M5R4	07/18/2011	Technical Revision	As required in Enforcement Discretion, the permitting of temporary Nebraska 79.8 MMBtu/h boiler, Unit 31Btemp.
P090R1M1	07/12/2010	Significant Modification	Incorporate 1092M5R2, which already incorporates 1092M5R1 and 1092M5.
1092M5R3	03/24/2010	Admin	Addition of exempt (.5 tpy) second AGI compressor
1092M5R2	08/10/2009	Admin	Removed references to SSM emissions: • Deleted Conditions 1.d, 1.e, 1.f, 2.d, and 2.e, 3.n, 4.g, 4.p, 4.q, 4.r, 4.s, and 4.t • Corrected a reference to Specific Condition 4.j • Specific Condition 3.l was not deleted as requested in the application Permit supersedes all portions of 1092M5-R1, except the portion requiring compliance tests.

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)
	04/27/2009	RO Notification	Changed Responsible Official to Robert Milam
1092M5R1	04/21/2009	Reopening	• Deleted Specific Condition 4.u • Clarified Specific Condition 4.s • Changed the Dates on Specific Condition 1.h • Replaced Unit S2 with an Identical Unit (s/n 333519) Permit supersedes all portions of 1092M5.
1092-M5	12/01/2008	Significant Revision	• Retired the B-Plant Engines • Retrofitted engines A1 and A2 with LE technology and increased the hours of operation from 500 to 8760 hr/yr. • After the retrofit of engines 1A and 2A, any two unit of the remaining A-plant engines (units 3A, 4A, or 5A) may operate at any one time, based on continues operations. • The permittee may retrofit a third A-plant engine (unit 3A, 4A or 5A) prior to May 25, 2009. If they do, then all a-Plant engines can operate on a continuous basis. • Replaced units S1-S4 with identical overhauled units per a May 9, 2008 administrative revision request. • NOx and CO emissions from four low-emission RICE-driven compressor engines, S1—S4 were reduced slightly based on the quarterly test data. • CO emissions from the GE turbine, 3T, were reduced slightly based on the test data. • "Smokeless flare" is defined. • Reduced the frequency for testing inlet gas sulfur content. • Added emissions from flaring under non-routine conditions. This application also captures small changes such as addresses, telephone numbers, etc. Permit supersedes all portions of 1092M4-R4.
P090R1	05/16/2008	Renewal	Changed the facility owner, Responsible Official, reporting and gas processing limits as established in NSR 1092M4 and 1092M4R1. Also, small corrections will be made to the emission limits for CO and SO_2 that appear to be corrections in past errors. Unit S-5 will have CO limits of 2.1 lbs / hr and 9.3 tons per year, a reduction of 8.4 lbs per hour and 29.3 tons per year. Also, the facility totals for SO_2 emissions from each unit will total 284.3 lbs per hour. The previous permit had a facility limit of 275.3 lbs / hour, and this resulted in an increase of 9 lbs / hr. SO_2 tons / year limits do not change.
1092M4R4	04/24/2008	Revision	Reduced the NOx emissions from units S1 – S4 to 39 tpy and added additional portable analyzer testing requirements if the quarterly test results exceed 7 lb/hr (30.7 tons/yr) to ensure that the units continue to meet their NOx and CO emission limits. Permit supersedes all portions of 1092M4-R1 and R2.

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)
1092M4R3	02/26/2008	PSD Admin (Denied)	Department's Replacement of Identical IC Engines and Turbines Policy (AQB 02-007.00) does not allow for IC engine or turbine replacements at PSD major facilities if any of the criteria pollutant emissions from the new engine(s) trigger a significant emissions increase as defined by 20.2.74.7.AW NMAC. The Department made a preliminary determination that this project results in a significant emissions increase, as defined in 20.2.74.AW NMAC.
1092M4R2	11/30/2007	Admin	Installed an additional acid gas treating train.
P090M5	03/13/2007	Admin Amendment	Established Bruce Williams as Responsible Official.
1092M4R1	09/18/2006	Reopening	Corrected a typographical error that described the existing acid gas injection well as new and revised references to General Condition 17 to accurately reflect the requirements for lean burn engines with oxidation catalytic converters. Permit supersedes all portions of 1092M4.
P090M4	09/01/2006	Admin Amendment	Established new dates for semi-annual reporting and annual certification
1092M4	06/08/2006	Significant Revision	Removed the 20 long tons per day sulfur throughput limit, allowing the facility to receive more sulfur into the plant, while keeping their existing sulfur limits. To allow for the increased sulfur into the plant, the facility will utilize an acid gas injection well. This action also removed any conditions that were no longer required. Permit supersedes all portions of 1092M3.
P090M3	05/03/2006	Admin Amendment	Changed name to Southern Union Gas Services.
P090M2	10/14/2005	Significant Modification	Incorporates NSR permit 1092M3, 1092M3R1 and R2 and settlement agreement between Sid Richardson Services, and the Department.
1092M3R2	06/20/2005	Admin	Revised typographic error and clarified Specific Condition 6.b: Initial compliance tests are required on the first two Superior 2416 G engines with catalytic converters to be installed, units S1, S2, S3 and S4, for NOx and CO, and the Superior 12SGTA engine, unit S5, with catalytic converter for NOx and CO, and the General Electric M5-5171 turbine for NOx and CO.
1092M3R1	06/07/2005	Admin	Removed Unit S-6, Superior 12SGTA, 32B, stand-by Vogt Boiler and 33B, stand- by Vogt Boiler.
P090M1	07/23/2004	Modification (Withdrawn)	As a result of a Settlement Agreement, it was decided to set aside the permit modification that had progressed up thru the preparation of a Draft Permit. AQB has received a permit application for the modification of the original permit. Therefore the folder that contains the initial documents up thru the draft permit will be closed.
1092M3	05/25/2004	PSD Minor Modification	As a result of a compliance order, this action

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)
			• Added four clean burn White Superior 2416 GTL engines @ 3200 hp (units S1-S4). These units will be equipped with oxidizing catalytic converters and AFRs to reduce CO. • Added two Clean burn White Superior 12 SGTA engines @ 2000 hp (Units S5 & S6) • Placed units A1 A5 & B1– B6 on a standby status not to exceed 500 hours per year. • Permanently retired units A6-A9, two solar turbines (Units 1T and 2T), and three generators (Units 1G-3G), revised emission rates for the GE Turbine (Unit 3T), and updated Unit 3T with a Lean Head Liner. • Updated the emission calculation of the heaters (Units 7H and 11H) based on new AP-42 emission rates. • Updated the emission calculation for the thermal oxidizer (Unit 9S) and allowed installation of a new burner on this unit. • Revised the emissions for the Vogt boilers, and allowed only one of the three to operate at any one time. Permit supersedes all portions of 1092 and 1092R1.
	02/23/2004	Settlement Agreement	A copy of the agreement is attached to Tempo's 1092M3 grey-bar.
1092M2	03/24/2003	PSD Minor Modification (Denied)	The application was denied because the emissions increases associated with the proposed modification exceed the 100 tpy "significant emission rates" for CO specified at 20.2.74.502. Table 2, making this a major modification.
P090	09/25/2002	Initial TV	The application was submitted on 15/15/95 because of the new Title V regulations.
1092M1	04/02/2002	Significant Revision (Withdrawn)	Dave Wunker, NSR Permits, sent a memo to Department lawyers on August 30, 2001, requesting an applicability determination. Proposed Changes: Recent testing performed by Sid Richardson to verify that Title V emissions limits can be met has indicated the need to raise allowable emissions. As a result of this testing Sid Richardson is proposing to raise allowable emissions on some units and lower them on others, but there will be an overall increase in allowables. The proposal is to raise NOx limits by 44 PPH and 227 TPY and CO by 131 PPH and 584 TPY. Retrofits rather than catalytic converters will be required on four to six engines to achieve adequate reductions to meet NAAQS. Since the retrofits will be experimental in nature, a four-year timetable for modification is proposed. The main issue with this permitting action had to do with the required offsets.
1092R1	02/26/2001	Revision	• Identified units 1B, 2B, 3B and 4B as Ingersoll-Rand KVS-412s instead of KVS-3s. Also these units have dual stacks with a height of

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)
			28.5 ft, diameter of 1.3 ft, stack temperature of approximately 700^{0}F, and stack velocity of 90.5 feet per second. • Identified 1G, 2G and 3G as having a sea level horsepower of 450 hp and derated horsepower of 413 hp instead of 667 hp. • Identified two emergency fire pumps. • Identified 11H as Eclipse gas heater.
1092	10/19/1992	Modification (Grandfathered source)	Constructed a sulfur recovery unit, replaced a lean oil absorption system with a cryogenics system, added one 6 MM Btu/hr heater, and removed two 14.8 MM Btu/hr heaters. Plant process capacity was reduced from 126 MM scfd to 100 MM scfd. Gas processed at the plant was reduced from 40 MM scfd to 25 MM scfd. The remainder of the gas is sent to a plant in Texas for processing. Because the facility did not meet NMAAQS for NO_2, two oil heaters that were part of the lean oil absorption system were shutdown to provide the required 120% offset for the new heater. All applicable air quality standards were met except the 24 hour NO_2 (State) standard. Permit emissions totals for the facility were: 3490.8 TPY for NOx, 518.4 TPY for CO, 123.5 TPY for VOC, and 1206 TPY for SO2. Sulfur emissions were reduced from 1869 TPY to 1206 TPY, NOx emissions were reduced slightly, VOC emissions increased, and there was little change in CO emissions. Initial compliance testes were not required on any of the existing equipment, and since the source had been grandfathered, testing has never occurred previously.
			The facility predates the Clean Air Act and was first permitted in 1992 under Permit No. 1092.

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.
NSR 1092M10 Public Involvement Plan (PIP) Approved on 6/24/2022.

7.0 Compliance Testing:

Unit No.	Compliance Test	Test Dates
C1	NSPS JJJJ, MACT ZZZZ	7/16/2019, 1/7/2020, 7/28/2020, 1/4/2022
C2	NSPS JJJJ, MACT ZZZZ	2/9/2019, 8/23/2016, 1/5/2017, 7/10/2017, 10/2/2017, 1/8/2018, 1/7/2019, 7/9/2019, 1/7/2020, 7/28/2020, 1/5/2022
C3	NSPS JJJJ, MACT ZZZZ	2/9/2016, 8/23/2016, 1/6/2017, 7/10/2017, 1/8/2018, 1/7/2019, 7/9/2019, 9/15/2021,

7.0 Compliance Testing:

Unit No.	Compliance Test	Test Dates
		1/4/2022
C4	NSPS JJJJ, MACT ZZZZ	2/9/2019, 8/24/2016, 1/26/2017, 7/10/2017, 10/2/2017, 1/8/2018, 9/6/2018, 1/7/2019, 9/5/2019, 1/22/2020, 7/28/2020
C5	NSPS JJJJ, MACT ZZZZ	TBD
C6	NSPS JJJJ, MACT ZZZZ	TBD
8F	Compliance with visible emissions per NSR 1092/TV-P090	02/12
9F	Compliance with visible emissions per NSR 1092/TV-P090	08/05
10F	Compliance with visible emissions per NSR 1092/TV-P090	02/12

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:**

6/24/2022: Second electric AGI Compressor was installed. Request for Verification of Compliance sent to Cindy today.

1/15/2019 email from Shannon Duran for Verification of Compliance. "The Compliance and Enforcement Section currently has five outstanding enforcement cases with Energy Transfer Partners. The NOVs are REG-0569-1701, REG-0569-1702, REG-0569-1801, REG-0569-1802, and REG-0569-1803 and all are excess emission cases from flaring events. They are in various stages of settlement. It is possible that these five cases will be combined into one settlement."

Update 2/25/19: ETC has submitted a draft SEP to install a redundant acid gas compressor system. We have asked for a few details and are awaiting a final deliverable.

10.0 **Modeling:**

Modeling for NSR 1092M10, issued 9/27/2021 by Angela Raso.

Permit Conditions: No additional permit conditions are required by this modeling. **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, NO_2, PM2.5, PM10, and SO_2; NMAAQS for CO, H_2S, NO_2, and SO_2; and Class II PSD increments for NO_2, PM2.5, PM10, and SO_2. **Action:** The permit can be issued based on this modeling analysis.

Modeling for NSR 1092M7, issued 5/23/13. In his 11/21/12 modeling report for the permit, Gi-Dong stated that "this modeling analysis demonstrates that operation of the facility described in this report neither causes nor contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for CO, NO_2 and SO_2; NMAAQS for CO, NO_2, SO_2, and H_2S; and PSD Class II Increment for NO_2 and SO_2."

Modeling for NSR 1092-M6, issued 10/6/11, Eric Peters stated that the "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 PM2.5."

11.0 **State Regulatory Analysis(NMAC/AQCR):**

STATE REGULATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	If subject, this would normally apply to the entire facility. 20.2.3 NMAC is a State Implementation Plan (SIP) approved regulation that limits the maximum allowable concentration of, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. Title V applications, see exemption at 20.2.3.9 NMAC The TSP NM ambient air quality standard was repealed by the EIB effective November 30, 2018.
20.2.7 NMAC	Excess Emissions	Yes	Facility	If subject, this would normally apply to the entire facility. If your entire facility or individual pieces of equipment are subject to emissions limits in a permit or numerical emissions standards in a federal or state regulation, this applies. This would not apply to Notices of Intent since these are not permits.
20.2.23 NMAC	Fugitive Dust Control	No	Facility	The facility is not located in Doña Ana or Luna Counties, and is therefore not subject to 40 CFR §51.930 or 20.2.23 NMAC.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	This facility does not have existing gas burning equipment having a heat input of greater than 1,000,000 million British Thermal Unit per year per unit. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.33.108 NMAC.
20.2.34 NMAC	Oil Burning Equipment: NO_2	No	N/A	This facility does not have existing oil burning equipment having a heat input of greater than 1,000,000 million British Thermal Unit per year per unit. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.34.108 NMAC.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	Yes	Facility	This regulation establishes sulfur emission standards for natural gas processing plants. The facility meets the definition of a new natural gas processing plant (the incinerator was added to the facility in 1976) under this regulation and is subject to the requirements of this regulation [20.2.35.7 (B) NMAC]. The facility meets the requirements under 20.2.35.110(B).
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and	N/A	N/A	**These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.**

STATE REGULATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
	Petroleum Refineries			
20.2.38 NMAC	Hydrocarbon Storage Facility	No	N/A	Not applicable as facility does not have petroleum storage tanks with a capacity > 20,000 gallons. In addition this plant does not contain a "tank battery" or a "hydrocarbon storage facility" as these terms are understood.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	The facility will not operate a sulfur recovery plant.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	C-1 thru C-6, 12H, 13H, 14H, 8F, 9F, 10F	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares. The combustion equipment at the facility is subject to this regulation.
20.2.70 NMAC	Operating Permits	Yes	Facility	After issuance of this permit revision, Jal 3 will be major for NOx and VOC. Jal 3 has been issued operating permit P-090-R3
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This regulation established a schedule of operating permit emission fees. The facility is subject to 20.2.70 NMAC and is therefore subject to requirements of this regulation.
20.2.72 NMAC	Construction Permits	Yes	Facility	The objective of this part is to establish the requirements for obtaining a construction permit. The facility is subject as emissions are greater than 10 lb/hr and 25 tpy of regulated air contaminants for which there are National or New Mexico Ambient Air Quality Standards.
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	The regulation establishes emission inventory requirements. The facility meets the applicability requirements of 20.2.73.300.A.1 NMAC.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	Facility	After issuance of this permit revisions, Jal 3 will no longer be classified as a PSD source.
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	This regulation establishes a schedule of construction permit emission fees. The facility is subject to 20.2.72 NMAC and is therefore subject to requirements of this regulation.
20.2.77 NMAC	New Source Performance	Yes	C-1 thru C-6, 8F, 9F, 10F, FUG1, FUG2, DR2, amine unit	These sources are subject to the requirements of 40 CFR Part 60.
20.2.78 NMAC	Emission Standards for HAPS	No	N/A	This facility emits hazardous air pollutants which are not subject to the requirements of 40 CFR Part 61.

STATE REGULATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	This regulation does not apply because the facility is not located in a nonattainment area.
20.2.80 NMAC	Stack Heights	No	N/A	This regulation established requirements for the evaluation of stack heights and other dispersion techniques. The stacks at the facility will follow good engineering practices. This regulation does not apply as all stacks at the facility will follow good engineering practice.
20.2.82 NMAC	MACT Standards for source categories of HAPS	Yes	DR2, C-1 thru C-6, 12H, 13H, 14H	The facility permitted HAP emissions will decrease to less than the major HAP source threshold, the facility was previously classified as a major HAP source and requests that the facility status be changed. The facility will no longer be subject to the major source requirements of 40 CFR 63 Subpart HH, Subpart ZZZZ, and Subpart DDDDD.

12.0 Federal Regulatory Analysis:

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 50	NAAQS	Yes	Facility	This regulation defines national ambient air quality standards. The facility meets all applicable national ambient air quality standards for NOx, CO, SO_2, H_2S, PM_{10}, and $PM_{2.5}$ under this regulation.
NSPS 40 CFR 60, Subpart A	General Provisions	Yes	C-1 thru C-6, 8F, 10F, 9F, FUG1, FUG2, DR2, amine unit	Applies if any other Subpart in 40 CFR 60 applies. NSPS KKK, Db, Dc, JJJJ, OOOO, OOOOa, and LLL apply.
NSPS 40 CFR60.40 a, Subpart Da	Subpart Da, Performance Standards for **Electric Utility Steam Generating Units**	No	N/A	This regulation establishes standards for performance for electric utility steam generating units. This regulation does not apply because the facility does not operate any electric utility steam generating units.
NSPS 40 CFR60.40b Subpart Db	**Electric Utility Steam Generating Units**	No	N/A	This regulation established standards for performance for industrial-commercial-institutional steam generating units. The regulation does not apply because the facility does not operate any industrial-commercial-institutional steam generating units with heat inputs greater than 100 MMBtu/hr.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Yes	12H, 14H	Applicability: facility has steam generating units for which construction, modification or reconstruction is commenced after June 9, 1989 and that have a maximum design heat input capacity of 29 MW (100 MMBtu/hr) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). This regulation applies to units 12H and 14H.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for **Storage Vessels for Petroleum Liquids** for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and **Prior** to July 23, 1984	No	N/A	Not applicable as there are no petroleum liquid storage vessels that commenced construction, reconstruction, or modification after May 18, 1978 and prior to July 23, 1984 and/or have capacities greater than 40,000 gallons.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for **Volatile Organic Liquid Storage Vessels** (Including Petroleum Liquid Storage Vessels) for	No	N/A	Not applicable as there are no volatile organic liquid storage vessels which commenced construction, reconstruction, or modification after July 23, 1984 and/or which have capacities greater than 75 cubic meters (m 3).

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
	Which Construction, Reconstruction, or Modification Commenced **After** July 23, 1984			
NSPS 40 CFR 60.330 Subpart GG	**Stationary Gas Turbines**	No	N/A	This regulation establishes standards of performance for stationary gas turbines. The facility does not operate stationary gas turbines and is therefore not subject to this regulation.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from **Onshore Gas Plants**	No	N/A	NSPS KKK applies to equipment leaks of VOC from natural gas processing plants constructed, reconstructed or modified after January 20, 1984 and on or before August 23, 2011. This subpart does not apply to equipment not in wet gas or VOC service. The new equipment will not be subject to this regulation.
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for **Onshore Natural Gas Processing**: SO_2 Emissions	No	N/A	Does not apply at amine units that send acid gas to acid gas re-injection well (AGI).
NSPS 40 CFR Part 60 Subpart OOOO	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	Yes	C-1, C-2, C-3, C-4	NSPS OOOO is applicable to the compressor of engine Units C1-C4 since construction commenced after August 23, 2011 (40 CFR 60.5365(e)). In addition, component changes associated with Units C1-C4 are considered a modification under NSPS OOOO. Therefore, NSPS OOOO (rather than NSPS KKK) applies to these specific fugitive components (portion of FUG1).
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	C-5, C-6	NSPS OOOOa is applicable to the compressors of engine Units C5-C6 since construction will commence after September 18, 2015 (40 CFR 60.5365(e)). NSPS OOOOa (rather than NSPS KKK) will apply to these specific fugitive components (portion of FUG1) and other process areas with applicable VOC.
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion	No	N/A	This regulation establishes standards of performance for stationary compression ignition internal combustion engines. This facility does not have compression ignition internal combustion engines. This regulation does not apply.

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
	Engines			
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Yes	C-1, C-2, C-3, C-4, C-5, C-6	The engines are subject to NSPS JJJJ per 60.4230(a)(4)(i) and the standards in 60.4233(e) and Table 1. C1 – C4 • 3550 hp • Mfr dates – 8/7/2018, 1/2/2008, 1/2/2008, and 1/2/2008 • 4SLB C5 – C-6 • 1875 hp • Mfr date – Post 7/1/2010 • 4SLB
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	There will be no electric generating units at the site.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	There will be no electric generating units at the site.
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	The Facility is not a municipal solid waste landfill.
NESHAP 40 CFR 61 Subpart A	General Provisions	No	N/A	This part applies to the owner or operator of any stationary source for which a standard is prescribed under this part.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for **Mercury**	No	N/A	The provisions of this subpart are applicable to those stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge. This facility does not process mercury therefore this regulation does not apply.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for **Equipment Leaks** (Fugitive Emission Sources)	No	N/A	The provisions of this subpart apply to each of the following sources that are intended to operate in volatile hazardous air pollutant (VHAP) service: pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and control devices or systems required by this subpart. VHAP service means a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 10 percent by weight of VHAP. VHAP means a substance regulated under this subpart for which a standard for equipment leaks of the substance has been promulgated. Benzene is a VHAP (See 40 CFR 61 Subpart J). The regulated activities subject to this regulation do not take place at this facility. The facility is not subject to this regulation.
MACT	General Provisions	Yes	C-1, C-2, C-3, C-4,	Applies if any other subpart in 40 CFR 63 applies.

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 63, Subpart A			C-5, C-6, DR2	
MACT 40 CFR 63.760 Subpart HH	**Oil and Natural Gas Production Facilities**	Yes	DR2	This facility is Subject to the requirements of 40 CFR 63 Subpart HH Facility is a minor source for HAPs (including formaldehyde and total HAPs), as indicated by this application and will comply with the minor source requirements of Subpart HH.
MACT 40 CFR 63 Subpart HHH		No	N/A	This subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271. **See link below** 40 CFR 63 Subpart HHH
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	No	N/A	This subpart established national emission limitation and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP. This facility is not a major source of HAP. This regulation does not apply.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No	N/A	This subpart establishes national emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from coal- and oil-fired electric utility steam generating units (EGUs) as defined in §63.10042 of this subpart. This facility does not contain the affected source. This regulation does not apply.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (**RICE MACT**)	Yes	C-1, C-2, C-3, C-4, C-5, C-6	The engines are subject to MACT ZZZZ and meet the requirements by complying with NSPS JJJJ per 63.6590(c)(1).
40 CFR 64	**Compliance Assurance Monitoring**	Yes	AGI	CAM applies to the acid gas re-injection well and a plan is attached to Permit 1092-M8R2 as Appendix B. The IC engines at the facility equipped with catalysts are not in themselves major sources. The dehy (DR2) is exempt from CAM because it is subject to an HH emission limit (glycol dehydration unit process vent standard) proposed after Nov. 15, 1990. (64.2(b)(1)(i))
40 CFR 68	**Chemical Accident Prevention**	Yes	Facility	Jal 3 is subject to the rule.
Title IV – Acid Rain	**Acid Rain**	No	N/A	Jal 3 is not an Acid Rain source.

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 72				
Title IV – Acid Rain 40 CFR 73	**Sulfur Dioxide** Allowance Emissions	No	N/A	Jal 3 is not an Acid Rain source.
Title IV-Acid Rain 40 CFR 75	**Continuous Emissions Monitoring**	No	N/A	Jal 3 is not an Acid Rain source.
Title IV – Acid Rain 40 CFR 76	**Acid Rain** Nitrogen Oxides **Emission Reduction Program**	No	N/A	Jal 3 is not an Acid Rain source.
Title VI – 40 CFR 82	Protection of **Stratospheric Ozone**	Yes	N/A	**(82.150)** if you service, maintain, or repair appliances, dispose of appliances, refrigerant reclaimers, **if you are an owner or operator of an appliance**, if you are a manufacturer of appliances or of recycling and recovery equipment, if you are an approved recycling and recovery equipment testing organization, and/or if you sell or offer for sell or purchase class I or class I refrigerants. ETC owns appliances containing CFCs and is therefore technically subject to this requirement. ETC uses only certified technicians for the maintenance, service, repair, and disposal of appliances and maintains the appropriate records for this requirement.

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

NSR Exempt Equipment (not entered into Tempo database) or **Title V - INSIGNIFICANT ACTIVITIES (**Dated March 24, 2005) as defined by 20.2.70.7.Q NMAC**:**

Unit Number	Source Description	
P1	Fire Pump	2.72.202.A.4
		Trival Actvity #5
P2	Fire Pump	2.72.202.A.4
		Trival Actvity #5
TK-6	Waste Oil Tank	2.72.202.B.2
		Insignificant Activity #5
TK-7	Waste Oil Tank	2.72.202.B.2
		Insignificant Activity #5
TK-8	Out of Service	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-9	Jacket Water Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-10	Lube Oil Tanks	2.72.202.B.2
		Insignificant Activity #5
TK-11	Lube Oil Tanks	2.72.202.B.2
		Insignificant Activity #5
TK-12	Detergent Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-13	Water Treater	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-14	Lube Oil Tanks	2.72.202.B.2
		Insignificant Activity #5
TK-15	Antifreeze Tank	2.72.202.B.2
		Insignificant Activity #5
TK-16	Lube Oil Tanks	2.72.202.B.2
		Insignificant Activity #5
TK-17	Lube Oil Tank	2.72.202.B.2
		Insignificant Activity #5
TK-18	Solvent Tank	2.72.202.B.2
		Insignificant Activity #5
TK-19	Waste Oil Tank	2.72.202.B.2
		Insignificant Activity #5
TK-20	Detergent Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-21	Solvent Tank	2.72.202.B.2

Unit Number	Source Description	
		Insignificant Activity #5
TK-22	Methanol Tank	2.72.202.B.5
		Insignificant Activity #5
TK-23	Methanol Tank	2.72.202.B.5
		Insignificant Activity #1
TK-24	Methanol Tank	2.72.202.B.5
		Insignificant Activity #1
TK-25	Corrosion Inhibitor Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-26	Waste Oil Tank	2.72.202.B.2
		Insignificant Activity #5
TK-27	Lube Oil Tank	2.72.202.B.2
		Insignificant Activity #5
TK-28	Lube Oil Tank	2.72.202.B.2
		Insignificant Activity #5
TK-29	Water Treater Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-30	Out of Service	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-31	Triethylene Glycol Tank	2.72.202.B.2
		Insignificant Activity #5
TK-32	Amine Tank	2.72.202.B.2
		Insignificant Activity #5
TK-33	Amine Tank	2.72.202.B.2
		Insignificant Activity #5
TK-34	Amine Tank	2.72.202.B.2
		Insignificant Activity #5
TK-35	Lube Oil Tanks	2.72.202.B.2
		Insignificant Activity #5
TK-36	Antifreeze Tank	2.72.202.B.2
		Insignificant Activity #5
TK-37	Detergent Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-38	AntifreezeTank	2.72.202.B.2
		Insignificant Activity #5
TK-39	Brine Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-40	Solvent Tank	2.72.202.B.2

Unit Number	Source Description	
		Insignificant Activity #5
TK-41	Gasoline Tank	20.2.72.202.B.5.
		Insignificant Activity #8
TK-42	Diesel Tank	2.72.202.A.3, 2.72.202.B.2
		Insignificant Activity #8
TK-43	Removed	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-44	Lube Oil Tank	2.72.202.B.2
		Insignificant Activity #5
TK-45	Detergent Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-47	Lube Oil Tank	Pressure Vessel (not a source)
		Trival Actvity #1
TK-48	Natural Gas Liquids Tank	Pressure Vessel (not a source)
		Trival Actvity #1
TK-49	Propane Tank	Pressure Vessel (not a source)
		Trival Actvity #1
TK-50	Condensate Tank	Pressure Vessel (not a source)
		Trival Actvity #1
TK-51	Condensate Tank	Pressure Vessel (not a source)
		Trival Actvity #1
TK-52	Condensate Tank	Pressure Vessel (not a source)
		Trival Actvity #1
TK-53	Treated Water Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-60	Treated Water Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-61	Treated Water Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-62	Treated Water Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-63	Treated Water Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-64	Raw Water Tank	Not a Source of any Regulated Pollutant
		Trival Actvity #1
TK-65	Sulfur Tank	Not a Source of any Regulated Pollutant

Unit Number	Source Description	
		Insignificant Activity #5
TK-66	Amine Tank	2.72.202.B.2
		Insignificant Activity #5
TK-67	Treated Water	Not a source of any regulated pollutant
TK-68	Bullet Tank	Not a source of any regulated pollutant
TK-71	Undergound Water Sump Tank	Not a source of any regulated pollutant
TK-72	Underground Water Sump Tank	Not a source of any regulated pollutant
Electric Compressor	Compressor	Not a source of any regulated pollutant
Electric AGI Compressor	Compressor	Not a source of any regulated pollutant
VENT	Plant Vent	Not a source of any regulated pollutant

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

A. Only CAM Plan updated for TV Minor Modification P090R3M1.

MONITORING SPECIFICATIONS:
Date of Monitoring Protocol used for Turbine and Operating Situation
Date of Monitoring Protocol used for IC Engine and Operating Situation
Date of Monitoring Protocol used for Heater and Operating Situation
Date of Monitoring Protocol used for Glycol Dehydrators and Operating Situation
Date of Monitoring Protocol used for Flares and Operating Situation –
Date of Monitoring Protocol used for SRU –
Date of Monitoring Protocol used for Tanks –
Date of Monitoring Protocol used for Fugitives –
Date of Monitoring Protocol used for VRUs –

B.

15.0 For Title V action: Cross Reference Table between NSR Permit 1092M10 and TV Permit P090R3. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:

Changed by NSR*	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
	A103 Facility: Applicable Regulations	A103 Facility: Applicable Regulations
	A104 Facility: Regulated Sources	A104 Facility: Regulated Sources
	A105 Facility: Control Equipment	A105 Facility: Control Equipment
	A106 Facility: Allowable Emissions	A106 Facility: Allowable Emissions
	A107 Facility: Allowable SSM	A107 Facility: Allowable SSM
		A107.C SSM Flaring Emissions for Unit 9F and 10F
		A107.D Malfunction Emissions
		A107.E Flare Pilot
		A107.F SSM CO and VOC Emissions for Units C1 – C4
	A108 Facility: Hours of Operations	A108 Facility: Hours of Operations
	A109 Facility: Reporting Schedules NR for NSR	A109 Facility: Reporting Schedules
		A109.A TV Semi-Annual
		A109.B TV ACC
		A109.C NSR Quarterly Reporting
	A110 Facility: Fuel Sulfur Requirements	A110 Facility: Fuel and Fuel Sulfur Requirements
	A112 Facility: 20.2.37, Particulate Matter	A111 Facility: 20.2.61 Opacity
	A201.A Engines: Periodic Testing (Units XXX)	A201.A Engines: Periodic Testing (Units S1– S5, 1A – 5A, and C1 – C4)
	A201.B Oxidation Catalyst Operation (Units S1 – S5 and C1 – C4)	A201.B Oxidation Catalyst Operation (Units S1 – S5 and C1 – C4)
	A201.C Fuel Flow Rate (Units S1 – S5 and 1A – 3A)	A201.C Fuel Flow Rate (Units S1 – S5 and 1A – 3A)
	A201.D Maintenance and Repair (Units S1 – S5, 1A – 5A, and C1 – C4)	A201.D Maintenance and Repair (Units S1 – S5, 1A – 5A, and C1 – C4)
	A201.E Initial Compliance Test (Units C1 – C4)	
	A201.E 40 CFR 60, Subpart JJJJ (Units C1 – C4)	A201.E 40 CFR 60, Subpart JJJJ (Units C1 – C4)
	A201.F MACT ZZZZ (Units C1 – C4)	A201.F MACT ZZZZ (Units C1 – C4)
	A202 Glycol Dehydrator	A202 Glycol Dehydrator
	A202.A Control Device Inspection (Unit DR1)	A202.A Control Device Inspection (Unit DR1)
	A202.B Extended Gas Analysis and GRI-GLYCalc Calculation (Unit DR1)	A202.B Extended Gas Analysis and GRI-GLYCalc Calculation (Unit DR1)

Changed by NSR*	NSR Condition #	TV Section #
	A202.C Glycol Dehydrator Gas Flow (Unit DR1)	A202.C Glycol Dehydrator Gas Flow (Unit DR1)
	A202.D 40 CFR 63, Subpart HH (Unit DR1 and Flare 9F)	A202.D 40 CFR 63, Subpart HH (Unit DR1 and Flare 9F)
	A203.A Tanks Throughput (Units TK-2 & 46)	A203.A Tanks Throughput (Units TK-46)
	A203.B Tank Loading – Condensate Loadout for Unit Loadout (Tanks TK-50 – TK-52)	A203.B Tank Loading – Condensate Loadout for Unit Loadout (Tanks TK-50 – TK-52)
	A203.C Tank Throughput (TK-1, TK-3 and TK-4)	A203.C Tank Throughput (TK-1, TK-3 and TK-4)
	A203.D Tank Vapor Recovery Unit (VRU) Control Device Inspection (TK-519, TK-519C, & TK-519A)	A203.D Tank Vapor Recovery Unit (VRU) Control Device Inspection (TK-519, TK-519C, & TK-519A)
	A204.A Operational Inspection for Heaters & Boilers (Units 7H, 11H, 31B, & 32B)	A204.A Operational Inspection for Heaters & Boilers (Units 7H, 11H, 31B, & 32B)
	A204.B Excess Air (Boilers, Unit 31B and 32B)	A204.B Excess Air (Boilers, Unit 31B and 32B)
	A204.C 40 CFR 60, Subpart Db (Boiler, Unit 32B)	A204.C 40 CFR 60, Subpart Db (Boiler, Unit 32B)
	A204.D 40 CFR 60, Subpart Dc (Boiler, Unit 31B)	A204.D 40 CFR 60, Subpart Dc (Boiler, Unit 31B)
	A204.E 40 CFR 63, Subpart DDDDD (Heaters, Units 7H and 11H and Boilers, Unit 31B and 32B)	A204.E 40 CFR 63, Subpart DDDDD (Heaters, Units 7H and 11H and Boilers, Unit 31B and 32B)
	A204.F Initial Compliance Testing for Unit 32B	A204.F Initial Compliance Testing for Unit 32B
	A205 Turbines – Not Required	A205 Turbines – Not Required
	A206.A Flares Operation (Units 8F, 9F, and 10F)	A206.A Flares Operation (Units 8F, 9F, and 10F)
	A206.B Facility Blowdown System – Visible Emissions (Units 8F, 9F, and 10F)	
	A206.C Pilot and Purge Flow (Unit 8F)	A206.B Pilot and Purge Flow (Unit 8F)
	A206.D GRI-GLYCalc Calculations (Unit 9F)	A206.C GRI-GLYCalc Calculations (Unit 9F)
	A207 Sulfur Recovery Unit	A207 Sulfur Recovery Unit - NR
	A207.A Equipment Inspection (Unit SRU and 9S)	A207.A Equipment Inspection (Unit SRU and 9S)
	A207.B SO_2 CEMS Operation (Unit SRU and 9S)	A207.B SO_2 CEMS Operation (Unit SRU and 9S)
	A207.C 40 CFR 60, Subpart LLL (New Treater, Existing Treater, SRU and 9S)	A207.C 40 CFR 60, Subpart LLL (New Treater, Existing Treater, SRU and 9S)
	A207.D Continuous Gas Flowmeters (New Treater, Existing Treater, AGI, SRU, and 9F)	A207.D Continuous Gas Flowmeters (New Treater, Existing Treater, AGI, SRU, and 9F)
	A207.E Sulfur Monitoring (New Treater, Existing Treater, AGI, SRU, and 9F)	A207.E Sulfur Monitoring (New Treater, Existing Treater, AGI, SRU, and 9F)
	A207.F Periodic Emissions Test (Unit 9S)	A207.F Periodic Emissions Test (Unit 9S)

Changed by NSR*	NSR Condition #	TV Section #
	A208 Amine Unit	A208 Amine Unit
	A208.A Sulfur Throughput (New Treater & Existing Treater)	A208.A Sulfur Throughput (New Treater & Existing Treater)
	A208.B Acid Gas Control Options (New Treater & Existing Treater)	A208.B Acid Gas Control Options (New Treater & Existing Treater)
	A209 Fugitives	A209 Fugitives
	A209.A 40 CFR 60, Subpart KKK (S1 compressor, S2 compressor, New Treater, 8F, & 10F)	A209.A 40 CFR 60, Subpart KKK (S1 compressor, S2 compressor, New Treater, 8F, & 10F)
	A209.B 40 CFR 60, Subpart OOOO (C1 compressor – C4 compressor)	A209.B 40 CFR 60, Subpart OOOO (C1 compressor – C4 compressor)
	A210 Acid Gas Injection System	A210 Acid Gas Injection System
	A210.A Facility CAM Requirement per 40 CFR 64 and Section C103 CAM Plan for Unit No. AGI	A210.A Facility CAM Requirement per 40 CFR 64 and Section C103 CAM Plan for Unit No. AGI
X	Part B General Conditions	Part B General Conditions, **entire Section updated**

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

A. Only CAM Plan updated for TV Minor Modification P090R3M1.

B. 2/27/23: AQB questioned why the lower injection pressure could be so low and this is the answer by Scott Hubert, Targa Engineer: "This is a combined Acid Gas and wastewater disposal well. It was permitted in March 2008 by the New Mexico Oil Conservation Division, Order No. R-12921. The design of the AGI well is to combine the acid gas and wastewater upstream of a well choke valve for mixing at a higher pressure than the well surface injection pressure. The injection pressures can run very low at times when the acid gas rate is low and the water injection rate is high." The explanation is reasonable and acceptable to explain changing the Lower pressure to 1 psiag.