Statement of Basis - Narrative
Title V Permit

Type of Permit Action: New Title V Permit

Facility: **XTO - Spartan Compressor Station**
Company: XTO Energy Inc
Permit No(s).: 7681M2; P293
Tempo/IDEA ID No.: 38274 - PRT20210001
Permit Writer: Joseph Kimbrell

Permit Review		
	Date to Enforcement: NR	**Date of Enforcement Reply:** NR
	Date to Applicant: 2/23/2023	**Date of Applicant Reply:** TBD
	Date to EPA: 2/23/2023	**Date of EPA Reply:** April 9, 2023 (45-day Period)
	Date to Supervisor: Draft-Proposed: 2/23/2023	

1.0 Plant Process Description:

The site uses natural gas engines to compress the field gas to 1200-1300 psig. The high-pressure gas is then dehydrated using triethylene glycol dehydration units, each handling up to 80 MMscfd each. The systems are equipped with flash tanks and condensers. Flash tank vapors are recycled in the dehydration system. The glycol still vent vapors are routed to condensers. Dehydrated gas is then transferred to a sales pipeline.

2.0 Description of this Modification:

The new Title V incorporates NSR Permit 7681M2. Permit 7681M2 consisted of removal of two (2) compressor engines and two (2) heaters, and modification of eleven (11) compressor engines, three (3) glycol dehydrators and their respective reboilers, three (3) flares, four (4) condensate tanks, two (2) produced water tanks, two (2) vapor recovery units (VRU), the low pressure separator, the condensate truck loading and start-up, shutdown and maintenance (SSM). The facility is proposing to add two new emissions sources - produced water truck loading and Malfunction emissions.
Adds to the permit the applicability to the new regulation 20.2.50 NMAC.

3.0 Source Determination:

1. The emission sources evaluated include entire facility.

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:

A. The source, as determined in 3.0 above, is a minor source before and after this modification. In Table 102.A of the draft NSR permit, it may appear that VOC put the facility into PSD status, but this total includes fugitive emissions and fugitives, per the PSD rule, do not count towards determining PSD status.

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)
P293	Due date 4/27/23	New Title V P293 (Joe Kimbrell)	The new Title V incorporates NSR Permit 7681M2.
7681-M2	02/11/2022 (Signed after Final Order for Hearing)	NSR-Significant Revision (Urshula Bajracharya)	This modification is for removal of two (2) compressor engines and two (2) heaters, and modification of eleven (11) compressor engines, three (3) glycol dehydrator and associated reboilers, three (3) flares, four (4) condensate tanks, two (2) produced water tanks, two (2) vapor recovery units (VRU), low pressure separator, one (1) truck loading and start-up, shutdown and maintenance (SSM). The facility proposing to add two new emissions sources-truck loading and Malfunction emission.
7681-M1	02/7/2019	NSR-Significant Revision (Todd Sherrill)	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.
*7681	6/13/2018	NSR – New (Jarrett Airhart)	Initial issuance

6.0 Public Response/Concerns:

For Title V P293: as of 2/21/2023 no comments have been received.
For NSR 7681M2: On May 24, 2021 the AQB received comments from WildEarth Guardians, including a request for a public hearing for this permit application.

7.0 Compliance Testing: Table as presented by the applicant in Section 17 of the application.

Unit No.	Compliance Test	Test Dates
ENG1	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	3/31/21 11/17/21
ENG2	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63	3/31/21

7.0 **Compliance Testing:** Table as presented by the applicant in Section 17 of the application.

Unit No.	Compliance Test	Test Dates
	Subpart ZZZZ for NOx, CO, VOC, and HCHO	11/16/21
ENG3	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/18/21 11/16/21
ENG4	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/19/21 11/17/21
ENG5	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/19/21 11/18/21
ENG6	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	3/31/21 11/18/21
ENG11	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/18/21 11/15/21
ENG12	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/18/21 11/15/21

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:**

9/20/2021: email from Teri Waldron stated: "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:**

For NSR 7681M2: The modeling report from Eric Peters (06/07/2021) states: 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.

11.0 State Regulatory Analysis (NMAC/AQCR):

STATE REGU-LATIONS Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	Yes	Entire Facility	**NSR:** 20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.
2.7	Excess Emissions	Yes	Entire Facility	Applies to all facilities' sources
2.38	Hydrocarbon Storage Facilities	Yes	OT1 – OT4	20.2.38 NMAC This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities.
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants	Yes	ENG1-ENG9; ENG11-ENG12	This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NOx) for oil and gas production, processing, compression, and transmission sources. **20.2.50 NMAC subparts**: **113 – Engines and Turbines** The natural gas-fired spark ignition engines (ENG1-9 and ENG11-12) will comply with applicable requirements of this subpart.
		Yes	FUG	**114 – 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.
		Yes	FL1-3; VRU1-2	**115 – Control Devices and Closed Vent Systems** The flares (FL1-3), vapor recovery units (VRU1-2), and associated closed vent systems will comply with applicable requirements of this subpart.
		Yes	FUG	**116 – Equipment Leaks and Fugitive Monitoring** The piping and equipment components at the facility will comply with applicable audio, visual, and olfactory (AVO) inspections; EPA M21 or optical gas imaging (OGI) inspections; and leak repair and replacement requirements of this subpart.

STATE REGU-LATIONS Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
		No	N/A	**117 – Natural Gas Well Liquid Unloading** The facility is not a natural gas well; therefore, this subpart is not applicable.
		Yes	DEHY1-3	**118 – Glycol Dehydrators** The glycol dehydrators (DEHY1-3) have a PTE of ≥ 2 tpy VOC and are subject to the applicable requirements of this subpart.
		No	HTR1; RB1-3	**119 – Heaters** The fuel line heater (HTR1) 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.
		No	LOAD	**120 – Hydrocarbon Liquid Transfers** The facility is connected to an oil sales pipeline that is routinely used for hydrocarbon liquid transfers; therefore, this facility is not subject to the requirements of this subpart per 20.2.50.120.A(1) NMAC.
		No	SSM	**121 – Pig Launching and Receiving** Individual pipeline pig launcher and receiver operations located within the property boundary and under common ownership and control have PTE <1 tpy VOC; therefore, the requirements of this subpart do not apply.
		No	FUG	**122 – Pneumatic Controllers and Pumps** There are no natural gas-driven pneumatic controllers or pumps at this site; therefore, the requirements of this subpart do not apply.
		Yes	OT1-4	**123 – Storage Vessels** The oil/condensate storage tanks (OT1-4) will comply with the applicable requirements of this subpart. The skim tanks (SKT1-2) and the produced water tanks (WT1-2) have a VOC PTE less than the applicability thresholds; therefore, the storage vessels are not subject to this subpart
		No	N/A	**124 – Well Workovers** **125 – Small Business Facilities** **126 – Produced Water Management Units** **127 – Flowback Vessels & Preproduction Operations** The facility is not one of the names sources in these subparts.

STATE REGU-LATIONS Citation 20 NMAC	**Title**	**Applies (Y/N)**	**Unit(s) or Facility**	**Justification:**
2.61	Smoke and Visible Emissions	Yes	FL1 – FL3, RB1 – RB3, ENG1 – ENG9, ENG11 – ENG12, 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.
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.
2.73	NOI & Emissions Inventory Requirements	Yes	Entire Facility	Applicable to all facilities that require a permit. PER **>** 10 tpy for a regulated air contaminant.
2.75	Construction Permit Fees	Yes	Entire Facility	This facility is subject to 20.2.72 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.
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.
2.79	Permits Nonattainment Areas	No		This facility is not located in, not does it affect, a nonattainment area. Link to Non-attainment Link areas
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.

12.0 Federal Regulatory Analysis:

Federal Regulation	**Title**	**Applies (Y/N)**	**Unit(s) or Facility**	**Comments**
Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Yes	Entire Facility	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.
NSPS Subpart A	General Provisions	Yes	See sources	Applies if any other subpart applies.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
(40 CFR 60)			subject to a Subpart in 40 CFR 60	
40 CFR Part 60 Subpart JJJJ (Quad-J)	Standards of Performance for Stationary Spark. Ignition Internal Combustion Engines	Yes	ENG1 – ENG6, ENG 7 – ENG9 (TBD), ENG11 – ENG12	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. Link to regulation – read more
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	FUG, Compressors for ENG1 – ENG9, ENG11 – ENG12.	The storage tanks were constructed after the applicability date of the rule; however, XTO is requesting emissions be limited to less than 6 tpy through enforceable requirements and control mechanisms. The regulation for storage vessels does take into consideration PTE which includes control equipment. The site uses low-bleed pneumatic controllers, hence these will not be subject. The facility is subject to leak monitoring from fugitive components. The compressors for the engines are subject.
NESHAP Subpart A (40 CFR 61)	General Provisions	No	See sources subject to a Subpart in 40 CFR 61	Applies if any other subpart applies.
MACT Subpart A (40 CFR 63)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 63	Applies if any other subpart applies.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	DEHY1 – DEHY3	In accordance with the definition of a major source as defined in 40 CFR 63.761, this facility is Subject to the requirements

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				of 40 CFR 63 Subpart HH Facility was major for HAPS after June 17, 2002.
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	ENG1 – ENG6, ENG7 – ENG9 (TBD), ENG11 – ENG12	See 63.6580 and EPA Region 1's Reciprocating Internal Combustion Guidance website. A facility is subject to this subpart if they own or operate a stationary RICE at a major source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

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

Unit Number	Source Description	Make	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 Engines and Operating Situation - December 11, 2019
B. Date of Monitoring Protocol used for Dehydrators and Operating Situation – February 12, 2018
C. Date of Monitoring Protocol used for Tanks, Loading – September 19, 2017
D. Date of Monitoring Protocol used for Heaters – August 18, 2017
E. Date of Monitoring Protocol used for Flares – April 20, 2021 & February 12, 2018

Actions of NSR 7681M2

A. New: Condition A107.D Malfunction Emissions; because facility requested Malfunction emissions.
B. New: Condition A107.E Dehy SSM; because facility requested SSM for Dehy.
C. New: Condition A107.F SSM Flare; because facility requested SSM for flares.
D. Modified: Condition A110.A Fuel and Fuel Sulfur Requirement was updated to current language and changed the requirement from 5 grain/100 dry cubic feet to 3.8 grain/100 dry cubic feet after back calculation discovered an error.
E. New: Condition A201.D 40 CFR 60, Subpart JJJJ for potentially subject units; because some units are not installed.
F. New: Condition A201.F 40 CFR 63, Subpart ZZZZ for potentially subject units; because some units are not installed.

G. New: Condition A202.E Flares (Units FL1, FL2, FL3): Control Device for BTEX Condensers (COND1-COND3)
H. Modified: Condition A203.A Condensate Tank Throughput to the most current language.
I. Modified: Condition A203.E Flares (Units FL1 – FL3): Control Device for Condensate Tanks (Units OT1 – OT4), Produced Water Tanks (Units WT1 – WT2), and Skim Tanks (Units SKT1 – SKT2; Removed LPS from the condition since LPS is covered under condition A203.F.
J. New: Condition A203.F Low Pressure Separator (LPS) and Control Devices (Vapor Recovery Units (Units VRU1 and VRU2) and Flares (Units FL1 – FL3)) because LPS is routed to the tanks
K. New: Condition 206.B Flare Gas Flow Monitoring and Gas Analysis; standard condition for flares.
L. Modified: Condition 206.C Flare Emissions Calculation; older permit condition was updated.
M. Moved: Condition 209.A 40 CFR 60, Subpart OOOOa – Reciprocating Compressors was moved to this location under fugitives (was formerly condition A202.G).
N. Modified: Condition 209.B 40 CFR 60, Subpart OOOOa – Fugitives (Unit FUG); the condition was modified to have the appropriate citation for compressor station.

15.0 <u>For Title V action: Cross Reference Table between NSR Permit 7681M2 and TV Permit P293. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:</u>

Changed by TV*	NSR Condition # 7681M2	TV Section # P293
X	A100 Introduction	A100 Introduction
X	A101 Permit Duration	A101 Permit Duration
	A102 Facility Description	A102 Facility Description
	Table 102.A Total Potential Emissions	Table 102.A Total Potential Emissions
	Table 102.B Total PTE for HAPs	Table 102.B Total PTE for HAPs
	A103 Facility: Applicable Regulations	A103 Facility: Applicable Regulations
X	A104 Facility: Regulated Sources	A104 Facility: Regulated Sources (added Part 50 applicable units)
	A105 Facility: Control Equipment	A105 Facility: Control Equipment
	A106 Facility: Allowable Emissions	A106 Facility: Allowable Emissions
	A106.B Subpart JJJJ Emission Limitations	A106.B Subpart JJJJ Emission Limitations
x		Table 106.C 20.20.50 NMAC emission standards (existing engines)
x		Table 106.D 20.20.50 NMAC emission standards (TBD engines)
	A107 Facility: Allowable SSM	A107 Facility: Allowable SSM
	A107.C SSM	A107.C SSM
	A107.D Malfunction	A107.D Malfunction
	A108 Facility: Hours of Operations	A108 Facility: Hours of Operations
	A109 Facility: Reporting Schedules NR for NSR	A109 Facility: Reporting Schedules
x		A109.A TV Semi-Annual
X		A109.B TV ACC
		A109.C NSR Quarterly Reporting

Changed by TV*	NSR Condition # 7681M2	TV Section # P293
	A110 Facility: Fuel Sulfur Requirements	A110 Facility: Fuel Sulfur Requirements
	A111 Facility: Throughput Limitation	A111 Facility: Throughput Limitation
	A201.A Engines: Periodic Testing (Units ENG1-9, ENG11-12)	A201.A Engines: Periodic Testing (Units ENG1-9, ENG11-12)
	A201.B: Initial Compliance Testing (Unit ENG4-9)	A201.B Initial Compliance Testing (Unit ENG4-9)
	A201.C: Catalytic Converter Operation (ENG1-9, ENG11-12)	A201.C: Catalytic Converter Operation (ENG1-9, ENG11-12)
	A201.D: 40 CFR 60, Subpart JJJJ (Potentially ENG4-9)	A201.D: 40 CFR 60, Subpart JJJJ (Potentially ENG4-9)
	A201.E : 40 CFR 60, Subpart JJJJ (ENG1-3, ENG11-12)	A201.E : 40 CFR 60, Subpart JJJJ (ENG1-3, ENG11-12)
	A201.D MACT ZZZZ (Potentially Units ENG4-9)	A201.D MACT ZZZZ (Potentially Units ENG4-9)
	A201.F MACT ZZZZ (Units ENG1-3, ENG11-12)	A201.F MACT ZZZZ (Units ENG1-3, ENG11-12)
	A201.G 40 CFR 63, /subpart ZZZZ	A201.G 40 CFR 63, /subpart ZZZZ
x		A201.H 20.2.50 NMAC /engines
x		A201.I 20.2.50 NMAC compressor /seals
	A202.A Glycol Dehydrator -Extended Gas Analysis & ProMax Calcs	A202.A Glycol Dehydrator -Extended Gas Analysis & ProMax Calcs
	A202.B: Glycol Pump Circulation Rate	A202.B: Glycol Pump Circulation Rate
	A202.C: Control Device Inspection	A202.C: Control Device Inspection
	A202.D: Vapor Combustor-Control Device for BTEX	A202.D: Vapor Combustor-Control Device for BTEX
	A202.E: 40 CFR 63, Subpart HH	A202.E: 40 CFR 63, Subpart HH
X		A202.F 20.2.50 NMAC- dehys
x		A202.G 20.2.50 NMAC control devices
	A203.A Tanks – condensate throughput	A203.A Tanks – condensate throughput
	A203.B Tanks – skim tank throughput	A203.B Tanks – skim tank throughput
	A203.C Tanks – truck loading	A203.C Tanks – truck loading
	A203.D Tanks – 20.2.38 NMAC	A203.D Tanks – 20.2.38 NMAC
	A203.E Tanks – control devices	A203.E Tanks – control devices
	A203.F tanks – LPS control device	A203.F tanks – LPS control device
	A203.G Tanks – 20.2.50 NMAC	A203.G Tanks – 20.2.50 NMAC
	A204.A Operational Inspection - heaters	A204.A Operational Inspection - heaters
	A204.B Reference to compliance of emission limits	A204.B Reference to compliance of emission limits
	A206.B Flares – flow monitoring	A206.A Flares - visible emissions
	A206.C Flares - calculations	A206.B Flares – flow monitoring
	A206.D Flares -parametric monitoring	A206.C Flares - calculations
	A206.B Flares – flow monitoring	A206.D Flares -parametric monitoring

Changed by TV*	NSR Condition # 7681M2	TV Section # P293
	A209.A 40 CFR 60, /subpart OOOOa - compressors	A209.A 40 CFR 60, /subpart OOOOa - compressors
	A209.B 40 CFR 60, Subpart OOOOa - /FUG	A209.B 40 CFR 60, Subpart OOOOa - /FUG
X		A209.C -20.20.50 NMAC - FUG
x		A209.D – 20.2.50 NMAC Pig Launching
X	Part B General Conditions	Part B General Conditions, **entire Section updated**

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

A. Removed condition A201.A Notification of Catalysts Installation from the permit since all engines are required to have Catalysts.

B. The engines (ENG1-ENG9) will not be subject to CAM because these units have standards under NSPS JJJJ.