

Statement of Basis - Narrative
NSR Permit

Type of Permit Action: Regular-New

Facility: Red Raider Compressor Station
Company: Delaware G & P, LLC
Permit No(s): 9897M1
Tempo/IDEA ID No.: 40971 - PRN20230002
Permit Writer: Julia Kuhn

Permit Review	Date to Enforcement: NA	Date of Enforcement Reply: NA
	Date to Applicant: 7/11/2023	Date of Applicant Reply: 7/12/2023
	Date to EPA: NA	Date of EPA Reply: NA
	Date to Supervisor: 6/22/2023, 7/12/2023, 8/22/2023	

1.0 Plant Process Description:

The facility is a natural gas compressor station, the purpose of which is to compress natural gas along a pipeline to sales. The facility consists of inlet separators, compressor engines, reboiler, dehydrator, tanks, enclosed combustion unit, vapor recovery unit, and truck loading.

Condensate and water are collected from the inlet separator and compression, then separated in a gunbarrel tank (TK-407) and stored in atmospheric storage tanks. Condensate is routed from the facility storage tanks (TK-406A and TK-406B) to be removed from the facility via truck (LOAD-1). Flash, working, and breathing emissions from the condensate and produced water tanks are routed first to a VRU. During 438 hr/yr VRU downtime, the tank and loading emissions are routed to a vapor combustor (Unit ECD-1) with an assumed 95% destruction removal efficiency.

Once the gas is compressed, it is treated using a glycol dehydration system to remove entrained water. The glycol dehydration unit (DEHY-1) incorporates three distinct sources of air emissions: (1) a gas-fired reboiler burner, (2) a glycol recovery still, and (3) a glycol flash tank. Flash tank emissions are sent to station suction. The still vent emissions go to the BTEX condenser. BTEX non-condensable is sent to reboiler stack with glow plug with 98% DRE.

2.0 Description of this Modification:

Red Raider Compressor Station, currently operating under a GCP O&G permit 9897, proposes to add 6 engines to the facility resulting in increased emissions and the requirement of an NSR permit. The equipment to be permitted at the facility will consist of eight natural gas-fueled engines, one reboiler, one TEG dehydrator, one 750 bbl gunbarrel separator tank, two 1000 bbl condensate tanks, one 1000 bbl produced water tank, condensate and produced water loading, one enclosed combustion device, and one vapor recovery unit. Additional emissions include Fugitives, Start-up, Shutdown, and Maintenance/Malfunction.

3.0 Source Determination:

1. The emission sources evaluated include Red Raider Compressor Station.

2. Single Source Analysis:

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

B. Common Ownership or Control: Are the facilities under common ownership or control? Yes

C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes

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

4.0 PSD Applicability:

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 of 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 a minor source before and after this modification.

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

Permit Number	Issue Date	Action Type	Description of Action (Changes)
9897M1	8/24/2023	NSR – New	New Source Review (NSR) permit in accordance with 20.2.72.200 NMAC to add six (6) Caterpillar 3612A4 engines (ENG-3, ENG-4, ENG-5, ENG-6, ENG-7, and ENG-8) resulting in increased emissions and consequently transitioning from a GCP O&G permit to an NSR permit. In addition, this permitting action updates fugitive emissions (FUG) to account for the new equipment, and modification of SSM and malfunction VOC emissions.
9897	4/5/2023	GCP OG – New	New Registration

6.0 Public Response/Concerns: AQB received comments from Nicholas Maxell on July 2, 2023. The initial citizen letter was emailed/mailed to the commenter on July 6, 2023. This letter includes information such as definition of an air quality permit, public notice requirements, application requirements, permit review process, and public hearings. A second citizen letter was emailed/mailed to Mr. Maxell on July 21, 2023, including a response to address his initial comments, SOB and NSR permit drafts. A final citizen letter will be emailed/mailed upon permit issuance.

7.0 Compliance Testing: Not applicable. This facility has not been constructed yet.

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

9.0 Compliance and Enforcement Status: Per C&E email received June 8, 2023, no enforcement actions for this facility were found.

10.0 Modeling:

Modeling Assumptions: The facility operates from continuously.

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, NO2, PM2.5, PM10, and SO2; NMAAQs for CO, NO2, and SO2; and Class I and Class II PSD increments for NO2, PM2.5, PM10, and SO2.

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

Modeling report submitted by Mincheng Ren (dated 4/27/2023)

The air quality analysis demonstrates compliance with applicable regulatory requirements.

Model(s) Used: AERMOD version 21112 was used to run the modeling analysis.

Note: Complete modeling input and output files can be made available and are located in the Modeling Archives in the folder, "9897M1_Delaware G&P, LLC_Red Raider CS".

11.0 State Regulatory Analysis(NMAC/AQCR):

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes, Always	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.3	Ambient Air Quality Standards	No	NA	NSR: 20.2.3 NMAC is a SIP approved regulation that establishes State standards in addition to the NAAQS. The NMAAQs themselves are not an “applicable requirement” with which a source must directly comply. The promulgation of a NMAAQs does not, in and of itself, automatically result in actionable measures applicable to a source. Instead, the specific measures contained in New Mexico’s EPA-approved SIP are the relevant applicable requirements.
2.7	Excess Emissions	Yes	Entire Facility	Applies to all facilities’ sources. Sections 6(b); 110(b)(15); 111; 112; 113; 115; and 116 are State Enforceable Only.
2.33	Gas Burning Equipment - Nitrogen Dioxide	No	NA	This facility does not have gas burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit; therefore, this regulation does not apply.
2.34	Oil Burning Equipment - Nitrogen Dioxide	No	NA	This facility does not have oil burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit; therefore, this unit does not apply.
2.35	Natural Gas Processing Plant – Sulfur	No	NA	This facility does not meet the definition of a natural gas processing plant; therefore, this regulation does not apply.
2.38	Hydrocarbon Storage Facilities	Yes	TK-406A and TK-406B	This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities. The facility has a storage capacity greater than 65,000 gallons; therefore, this regulation is subject.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants	Yes	ENG-1 through ENG-8, RBL-1, VRU-1, ECD-1, DEHY-1, LOAD-1, FUG Natural Gas Driven Pneumatic Controllers and Pumps; and Compressor Seals	<p>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:</p> <p>113- Compressor Engines (Units ENG-1 through ENG-8) will comply with the requirements of this subpart.</p> <p>114- Compressor Engines (Units ENG-1 through ENG-8) will comply with the requirements of this subpart.</p> <p>115 – Open Flares, Control Devices, Closed Vent Systems. The reboiler is a control device for the dehydrator; therefore, RBL-1 is subject to the requirements of this rule. The Vapor Recovery Unit (VRU-1) and the Enclosed Combustion Device (ECD-) are controls for the LOAD-1 unit and Subject to this subpart. TK-406A, TK-406B, TK-406C, and gunbarrel TK-407 are controlled by VRU-1 and ECD-1 (during VRU downtime) and have a PTE under the 2 tpy Part 50 NMAC threshold. Therefore, the tanks are not subject.</p> <p>116 – This facility will have equipment leaks and fugitive emissions. Thus, it will comply with this regulation.</p> <p>117 – This facility is a natural gas compressor station. Thus, it is not subject to this rule.</p> <p>118- Glycol Dehydrator (Unit DEHY-1) has a PTE greater than 2 tpy; therefore DEHY-1 is subject to this subpart.</p> <p>119- RBL-1 has a heat rating less than 20 MMBtu/hr; therefore, this subpart is not applicable to this unit.</p> <p>120 – This facility will truck out more than 13 times a year and is therefore subject to this subpart.</p> <p>121 – This facility does not have any pig launching and receiving. Therefore, this facility is not subject to this subpart.</p> <p>122 – This facility is subject to this subpart and will comply with this subpart as stated in 20.2.50.122.B(3) Table-2.</p> <p>123 – This facility has less than 2 tpy maximum allowable VOC emissions. Thus, it is not subject to this subpart.</p>

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.61	Smoke and Visible Emissions	Yes	ENG-1, through ENG-8, RBL-1, and ECD-1	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC).
2.70	Operating Permits	Yes	Entire Facility	The source is a Title V Major Source as defined at 20.2.70.7 NMAC. The facility has the potential to emit more than 100 tpy of carbon monoxide; therefore, this regulation is subject.
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, Always	Entire Facility	Emissions Inventory Reporting: 20.2.73.300 NMAC applies. This facility will be issued a permit under 20.2.72 NMAC, therefore it will meet the applicability requirements of 20.2.73.300 NMAC.
2.74	Permits-Prevention of Significant Deterioration	No	Entire Facility	The facility is not a major PSD site.
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. ENG-1 through 8 are subject to NSPS Subpart JJJJ. FUG-1, ENG-1 through 8 Compressors are subject to NSPS Subpart OOOOa; or OOOOb once this regulation is promulgated and applicability should be determined at that time.
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	NA	This facility is not located in, not does it affect, a nonattainment area.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.82	MACT Standards for Source Categories of HAPs		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. DEHY-1 are subject to NSPS Subpart HH ENG-1 through 8 are subject to NSPS Subpart ZZZZ

12.0 Federal Regulatory Analysis:

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	No	NA	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.
NSPS Subpart A (40 CFR 60)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 60	Applies if any other subpart applies. FUG applies as it is subject to NSPS Subpart OOOOa, and Units ENG-1 through ENG-8 will be subject to Subparts JJJJ and OOOOa. These units are potentially subject to OOOOb when the rule is promulgated.
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	NA	This subpart does not apply. This regulation is applicable to tanks after May 18, 1978, and prior to July 23, 1984. Tanks TK-406A and TK-406B have a storage capacity greater than 151,416 liters (40,000 gallons) that are used to store petroleum liquids for which construction commenced after regulation applicability.
40 CFR 60, Subpart Kb	Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or	No	NA	This subpart is applicable to tanks used to store volatile organic liquids and for which construction, reconstruction, or modification commenced after July 23, 1984. This subpart does not apply to vessels with a design capacity less than or equal to 1,589.874 m ³ used for petroleum or condensate stored, processed, or treated prior to custody transfer, per §60.110b(d)(4):

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
	Modification Commenced After July 23, 1984			<p>Tanks TK-406A and TK-406B have a storage capacity which are equal to or less than 1000 bbls and store produced condensate prior to custody transfer. The tank's condensate is routed from the facility via truck. The tanks are not subject to this subpart.</p> <p>Under 60.111b Definitions: <i>Custody Transfer</i> means the transfer of produced petroleum and/or condensate, after processing and/or treatment in the producing operations, from storage vessels or automatic transfer facilities to pipelines or any other forms of transportation.</p>
40 CFR Part 60 Subpart IIII (Quad-I)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	No	NA	<p>The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.</p> <p>The facility does not operate any affected sources.</p>
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Yes	ENG-1 through ENG-8	<p>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.</p> <p>ENG-1 through ENG-8 were manufactured after June 12, 2006, and have maximum engine power greater than 500 HP. Thus, ENG-1 through ENG-8 are subject to this subpart.</p>
NSPS 40 CFR Part 60 Subpart OOOO (Quad -O)	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	No	NA	<p>The rule applies to "affected" facilities that are constructed, modified, or reconstructed after Aug 23, 2011 (40 CFR 60.5365): gas wells, including fractured and hydraulically refractured wells, centrifugal compressors, reciprocating compressors, pneumatic controllers, certain equipment at natural gas processing plants, sweetening units at natural gas processing plants, and storage vessels.</p> <p>If there is a standard or other requirement, then the facility is an "affected facility." Currently there are standards for: gas wells (60.5375); centrifugal compressors (60.5380); reciprocating compressors (60.5385); controllers (60.5390); storage vessels (60.5395); equipment leaks (60.5400); sweetening units (60.5405).</p>

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				The facility is NOT subject to the provisions of NSPS Subpart OOOO. The site post-dates Subpart OOOO applicability.
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	TBD	ENG-1 Through ENG-8 Compressors and FUG	<p>The facility IS subject to the provisions of NSPS Subpart OOOOa as listed below as the regulation is applicable to natural gas compressor stations constructed after September 18, 2015.</p> <p>- Unit FUG and ENG-1 through ENG-8 Compressors are subject to this regulation.</p> <p>The storage tanks have a potential to emit <u>less than 6 tpy</u>; therefore, the tanks are not subject to this regulation.</p> <p>OOOOb: This regulation is applicable to natural gas compressor stations constructed after November 15, 2021. FUG and ENG-1 through ENG-8 Compressors will be subject to this regulation when the rule is promulgated.</p>
NSPS 40 CFR Part 60 Subpart OOOOb	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After November 15, 2021	TBD	ENG-1 Through ENG-8 Compressors and FUG	<p>OOOOb: This regulation is applicable to natural gas compressor stations constructed after November 15, 2021.</p> <p>FUG and ENG-1 through ENG-8 Compressors will be subject to this regulation when the rule is promulgated.</p> <p>Since the construction date could change once OOOOb is promulgated, applicability determination will be made at that time.</p>
NESHAP Subpart A (40 CFR 61)	General Provisions	No	NA	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	<p>Applies if any other subpart applies.</p> <p>This facility is not subject to any subparts of 40 CFR 61</p>
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	DEHY-1	<p>This regulation applies because the facility is an AREA SOURCE (Minor for HAPs):</p> <p>The facility contains affected sources (TEG glycol dehydrators, 63.760(b)(2)). However, as actual benzene emissions are less than one ton per year (63.764(e)(ii)), the dehydrators are exempt, and the records of the determination must be maintained as required in §63.774(d)(1).</p>

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	ENG-1 through ENG-8	<p>The facility is a minor source for HAPS.</p> <p>ENG-1 through ENG-8 are stationary internal combustion engines with 3,750 HP to 5,000 HP. All engine units subject to this subpart per §63.6590(a)(2) as new stationary RICE: (i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.</p> <p>Per §63.6590(c): <i>Stationary RICE subject to Regulations under 40 CFR Part 60.</i> An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part. The units meet the criteria of (1): A new or reconstructed stationary RICE located at an area source.</p>
40 CFR 64	Compliance Assurance Monitoring	No	NA	<p>Unit DEHY-1 is equipped with control devices (BTEX Condensers and Reboiler) and the uncontrolled emissions for these units are above the Title V major source thresholds. Non-condensable emissions are routed to the reboiler stack with glow plug for combustion (98% DRE) and therefore, the dehydrator unit may be subject to Part 64.</p> <p>DEHY-1 should be evaluated for Part 64 applicability when submitting TV application under Part 70.</p>
40 CFR 68	Chemical Accident Prevention	Yes	Facility	The facility has more than a threshold quantity of a regulated substance in a process, as determined under §68.115. The owner will comply by maintaining a Risk Management Plan.
40 CFR 70	Title V- State Operating Permit Programs	No	NA	Operating Permit Program – is not applicable – New Mexico State has full delegated authority and Title V is administered under 20.2.70 NMAC.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No	NA	This facility will have appliances containing CFCs. The owner will use only certified technicians for the maintenance, service, repair and disposal of appliances to comply with this regulation.

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

NSR Exempt Equipment (not entered into Tempo database)

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction ²
TK-408	Methanol Tank	TBD	TBD	400	20.2.72.202.B.5 NMAC	TBD
			TBD	bbl		TBD
HAUL	Haul Road	N/A	N/A	N/A	20.2.72.202.B.5 NMAC	N/A
			N/A	N/A		N/A

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

- A. Date of Monitoring Protocol used for Engines: December 11, 2019
- B. Date of Monitoring Protocol used for Glycol Dehydrators: February 12, 2018
- C. Date of Monitoring Protocol used for Tanks: September 19, 2017
- D. Date of Monitoring Protocol used for Flares/ECD: April 20, 2021
- E. Date of Monitoring Protocol used for Fugitives: February 11, 2022
- F. NMAC 50: Ozone Precursor Pollutants: conditions for engines, dehydrator, reboiler, ECD, VRU, loadout, natural gas driven pneumatic controllers and pumps, and fugitive units subject to 20.2.50 NMAC.

15.0 For Title V action: Cross Reference Table between NSR Permit 9897M1 and TV Permit NA. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:

Not Required, a TV permit has not been issued.

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

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

- A. This permit reflects newly updated conditions and current monitoring protocol language.
- B. As of August 5, 2022, the facility is subject to 20.2.50 NMAC.
- C. The reboiler is a control device for the dehydrator; therefore, RBL-1 is subject to the requirements of 20.2.50.115 NMAC.
- D. VRU-1 and ECD-1 are control units for LOAD-1. All three units are subject to the requirements of 20.2.50.115 NMAC and 20.2.50.120 NMAC.

- E. 40 CFR 64 Compliance Assurance Monitoring applicability analysis should be determined and, if appropriate, include the plan in the initial TV application for the dehydrator. Unit DEHY-1 is equipped with control devices (BTEX Condenser, Reboiler) and the uncontrolled emissions for these units are above the Title V major source thresholds.
- F. The citizen letter sent to Nicholas Maxwell was returned to AQB due to “unable to forward”. The address provided is a P.O. Box and most likely the certified mail was not claimed/signed. However, the Initial and Second Citizen letters were previously emailed to the commenter 7/6/2023 and 7/21/2023, respectively. The Final Citizen letter will be email to Mr. Maxell along with the final permit after issuance.