

Statement of Basis - Narrative
NSR Permit

Type of Permit Action: Regular-New

Facility: Reveille Compressor Station
Company: Delaware G & P, LLC
Permit No(s): 9896-M1
Tempo/IDEA ID No.: 40948 - PRN20230002
Permit Writer: Urshula Bajracharya

Fee Tracking (not required for Title V)

Tracking	NSR tracking entries completed: <input type="checkbox"/> Yes <input type="checkbox"/> No
	NSR tracking page attached to front cover of permit folder: <input type="checkbox"/> Yes <input type="checkbox"/> No
	Paid Invoice Attached: <input type="checkbox"/> Yes <input type="checkbox"/> No
	Balance Due Invoice Attached: <input type="checkbox"/> Yes <input type="checkbox"/> No
	Invoice Comments: Balance paid in full

Permit Review	Date to Enforcement: N/A	Date of Enforcement Reply: N/A
	Date to Applicant: TBD	Date of Applicant Reply: TBD
	Date to EPA: N/A	Date of EPA Reply: N/A
	Date to Supervisor: 7/14/2023	

1.0 Plant Process Description:

This facility is a compressor station that compresses natural gas along a pipeline to sales. The facility has an inlet separator, compressor engines, reboiler, dehydrator, enclosed combustion unit, and vapor recovery unit. Once the gas is compressed, the gas is treated using a glycol dehydration system to remove entrained water.

2.0 Description of this Modification:

The facility is adding six (6) compressor engines. The facility previously had a GCP Oil and Gas permit, and was permitted for two (2) compressor engines, one (1) reboiler, one (1) dehydrator, one (1) gunbarrel tank, two (2) condensate tanks, one (1) produced water tank, one (1) enclosed combustion device and one (1) vapor recovery unit.

3.0 Source Determination:

1. The emission sources evaluated include **the 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.**

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)
9896M1	TBD	New NSR permit	The facility is adding six compressor engines to the facility.
9896	4/5/2023	GCP Oil & Gas	The facility added two compressor engines, one reboiler, one TEG dehydrator, one 750 bbl gunbarrel tank, two 1000 bbl condensate tanks, one 1000 bbl produced water tank, one enclosed combustion device, and one vapor recovery unit.

6.0 Public Response/Concerns: On July 1, 2023 we received comments from Mr. Nicholas R. Maxwell. The first citizen letter was sent to the Mr. Maxwell on July 6, 2023, with information about the process for requesting a hearing. The second citizen letter was sent to Mr. Maxwell on July 21, 2023, which addressed concerns he had expressed in his letter, along with draft of the permit and statement of basis. As the date of the footer, we did not receive request for hearing and thus the permit was issued.

7.0 Compliance Testing:

Unit No.	Compliance Test	Test Dates
N/A	N/A	N/A

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:

The email response from Compliance and Enforcement staff Alejandra Avila on July 20, 2023 state: “For facility,

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“I did not find any enforcement action.”

10.0 Modeling:

The modeling report received from Sufi Mustafa of Modeling section dated July 21, 2023, 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):

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes, Always	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	see justification	Entire Facility	NSR: 20.2.3 NMAC is a SIP approved regulation that establishes State standards. 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 to a source. Instead, the specific measures contained in each individual issued permit, other state promulgated rules, and NM’s EPA approved SIP are the relevant applicable requirements (such as NSPS and MACT). Title V: 20.2.3.9 NMAC, LIMITATION OF APPLICABILITY TO 20.2.70 NMAC. The requirements of NMAAQs are not applicable requirements under 20.2.70 NMAC, as defined by 20.2.3.9 NMAC, 20.2.3.9 NMAC does not limit the applicability of this part to sources required to obtain a permit under the minor NSR regulation, 20.2.72 NMAC, nor does it limit which terms and conditions of NSR permits issued pursuant to 20.2.72 NMAC are applicable requirements in a Title V permit.
2.7	Excess Emissions	Yes, Always	Entire Facility	Applies to all facilities' sources except Sections 6(b); 110(b)(15); 111; 112; 113; 115; and 116 are State Enforceable Only.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.50	Oil and Gas Sector – Ozone Precursor Pollutants	Yes	ENG -1 through ENG-8, RBL-1, ECD-1, VRU-1, DEHY-1, LOAD-1, FUG, pneumatic controllers	<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> <ul style="list-style-type: none"> 113 – Engines and Turbines 114 – Compressor Seals 115 – Control Devices and Closed Vent Systems 116 – Equipment Leaks and Fugitive Emissions 117 – Natural Gas Well Liquid Unloading 118 – Glycol Dehydrators 119 – Heaters 120 – Hydrocarbon Liquid Transfers 121 – Pig Launching and Receiving 122 – Pneumatic Controllers and Pumps 123 – Storage Vessels 124 – Well Workovers 125 – Small Business Facilities 126 – Produced Water Management Units 127 – Flowback Vessels and Preproduction Operations <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 – The control devices and closed vent systems at this facility are not used to comply with the requirements of this rule; therefore, they are not subject to the requirements of this rule.</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 ID: 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 subject.</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>
2.61	Smoke and Visible Emissions	Yes	ENG-1 through ENG-8, RBL-1, ECD-1	<p>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). The engines, reboilers and combustion devices are subject.</p>
2.70	Operating Permits	Yes	Entire Facility	<p>The source is a Title V Major Source as defined at 20.2.70.7 NMAC. The facility need to apply for a new Title V permit after issuance of this NSR.</p>
2.71	Operating Permit Fees	Yes	Entire Facility	<p>Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.</p>

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.72	Construction Permits	Yes	Entire Facility	Specify Section 200.A.1 - 200 A.6, or 219.B.X PER > 10 pph or 25 tpy for a criteria pollutant, or Section 220 – General Permit, or Section 300 – Streamline, or Section 400 Toxics Or NSR Permits are the applicable requirement, including 20.2.72 NMAC.
2.73	NOI & Emissions Inventory Requirements	Yes, Always	Entire Facility	Applicable to all facilities that require a permit. PER > 10 tpy for a regulated air contaminant.
2.75	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.
2.82	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 (40 CFR 60)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 60	Applies if any other subpart applies.
40 CFR Part 60 Subpart JJJ (Quad -J)	Standards of Performance for Stationary Spark-Ignition Internal Combustion Engines	Yes	TBD ENG-1 through ENG-8	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

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				The engines may be subject to JJJJ after installation.
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	TBD ENG-1 through ENG-8, FUG	The compressors at the facility for ENG-1 through ENG-8 and fugitive emission will be subject due to commencement of construction date (collection of fugitive emissions components at a compressor station, because additional compressors are being installed at a compressor station).
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 Subpart HH	Oil and Natural Gas Production Facilities	Yes	DEHY-1	The dehydrator (Unit DEHY-1) is located at an area source of HAPS and has the potential to emit less than 1 tpy (0.90 megagram per year) of benzene. Therefore, it is subject to the operating and recordkeeping requirements of §63.764(e)(1)(ii).
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	Units ENG-1 through ENG-8	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 area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.
40 CFR 64	Compliance Assurance Monitoring	Yes	DEHY-1	The unit DEHY-1 will require a CAM plan in the Title V permit due to the uncontrolled emissions greater than 100 tpy.

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

NSR Exempt Equipment (not entered into Tempo database)

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
TK-408	Methanol Tank	TBD	TBD	400	20.2.72.202.B.2 NMAC	N/A
			TBD	bb1	List Item #5	N/A
HAUL	Haul Road	N/A	N/A	N/A	20.2.72.202.B.5 NMAC	N/A
			N/A	N/A	List Item #1. a	N/A

14.0 New/Modified/Unique Conditions:

As a new regular NSR permit, most conditions are new for this facility.

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

A. The permit has the new modified SSM condition.