**FACT SHEET**

**GCP-Temporary Control**

NMED Issues Two New General Construction Permits

for Temporary Control Devices at Oil and Gas Production Sites

1. The NMED has issued two new General Construction Permits for temporary control devices (less than 12 months) to be authorized at oil and gas production sites. These permits have been issued in accordance with 20.2.72 NMAC. They are voluntary permits for operators of production sites that are temporary controlling (destroying) VOC, and where the PER or the PTE of the facility exceeds applicability thresholds either under Part 70 or Part 72.
2. The new permits have been developed to authorize the temporary control of VOC. Both permits authorize important control devices to reduce emissions. The permit conditions improve the Department’s ability to determine compliance with the allowable emission limits established in the Registration Form.
3. Combusting (destroying) this pollutant stream will greatly reduce VOC and greenhouse gas emissions.
4. AQB has issued two sizes of the new permits. One permit has been developed for minor sources (GCP-TC-Minor), and one permit has been developed for TV major sources (GCP-TC-Major).
5. Developing these two separate GCP permits (GCP-Temporary Control Minor and GCP-Temporary Control Major) achieve several important benefits.
   1. Facilities that would normally be TV major, can elect to be synthetic minor by simply applying for the GCP-TC-Minor permit.
   2. If a single permit covered both TV minor and TV major sources, every facility would be required to constantly depend upon monitoring and documentation of calculations to determine which conditions apply. Separating the GCPs eliminates this constant guess work.
   3. The two permits establish consistent monitoring, recordkeeping, and reporting requirements for the control device that meet the requirements of their respective regulations (Part 72 & 70).
   4. Having two separate permits provides Fee Regulation clarity (Part 75 or Part 71).
6. Facilities potentially subject to Title V or PSD permitting requirements may use GCP – Temporary Control Minor to establish federally enforceable emission limits to stay below both TV and PSD major source permitting requirements.
7. Facilities potentially subject to PSD permitting requirements may use the GCP – Temporary Control Major to establish federally enforceable emission limits to stay below PSD permitting requirements.
8. The NMED held a public hearing on these permits in September, 2018. Notices of the public hearing were published in various newspapers in the State.
9. Benefits of GCP permits:
   1. The permit process is streamlined because the air dispersion modeling analyses have already been performed. These permits are authorized to operate anywhere in the State. This pre-modeling, which is required for any GCP, saves modeling review resources.
   2. General Construction Permits standardize permit conditions and requirements, which provides consistency in permits, improves the ability to determine compliance, and provides regulatory certainty for compliance requirements.
   3. Companies that own and operate under this permit can, thus, standardize compliance demonstrations, forms, calculation methods, testing protocols, and compliance schedules for their compliance staff.
   4. The Department has also developed an Air Emissions Calculation Tool, which is s calculation tool submitted with the Registration Form. This Tool standardizes the emission calculations, which helps reduce errors and make process review time more efficient.
   5. The Department will issue a General Operating Permit (GOP) to cover those facilities that are major sources under 20.2.70 NMAC.

Questions or comments may be directed to Liz Bisbey-Kuehn at [Elizabeth.kuehn@state.nm.us](mailto:Elizabeth.kuehn@state.nm.us) or at 505-476-4305.