Southern Ute Indian Tribe
Environmental Programs Division
Air Quality Program
71 Mike Frost Way
Ignacio, Colorado 81137

AIR POLLUTION CONTROL
TITLE V PERMIT TO OPERATE

In accordance with the provisions of title V of the Clean Air Act (42 U.S.C. 7661-7661f) and Part 1, Article II of the Southern Ute Indian Tribe/State of Colorado Environmental Commission's Reservation Air Code (RAC) and applicable rules and regulations,

BP America Production Company
Treating Site #2 Central Delivery Point

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the conditions listed in this permit.

This source is authorized to operate at the following location:

Southern Ute Indian Reservation
NE¼, NW¼ Section 20, T32N, R8W
La Plata County, Colorado

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by the Tribe and citizens under the Clean Air Act.

Brenda Jarrell

Brenda Jarrell, Air Quality Program Manager
Environmental Programs Division
Southern Ute Indian Tribe

AIR POLLUTION CONTROL
TITLE V PERMIT TO OPERATE
BP America Production Company
Treating Site #2 Central Delivery Point

Permit Number: V-SUIT-0002-2014.00		Issue Date:	February 21, 2014
Replaces Permit No.: V-SU-0002-2005.02		Effective Date:	April 2, 2014
		Expiration Date:	April 2, 2019

The permit number cited above should be referenced in future correspondence regarding this facility.

Permit Issuance History

DATE	TYPE OF ACTION	SECTION NUMBER AND TITLE	DESCRIPTION OF ACTION
September 1999	Initial Part 71 Permit Issued		# V-SU-0002-00.00
September 2007 January 2008 January 2011	1st Renewal Part 71 Permit Issued Two Administrative Amendments		# V-SU-0002-05.00 # V-SU-0002-05.01 # V-SU-0002-2005.02
February 21, 2014	Initial Part 70 Permit issued		# V-SUIT-0002-2014.00 Replaces EPA-issued permit #V-SU-0002-2005.02

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Abbreviations and Acronyms

4SLB	Four-Stroke Lean-Burn
4SRB	Four-Stroke Rich-Burn
AQP	Southern Ute Indian Tribe's Air Quality Program
bbl	Barrels
BACT	Best Available Control Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System (includes COMS, CEMS and diluent monitoring)
COMS	Continuous Opacity Monitoring System
CO	Carbon monoxide
CO_2	Carbon dioxide
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
EPA	United States Environmental Protection Agency
FGD	Flue gas desulfurization
gal	Gallon
GPM	Gallons per minute
H_2S	Hydrogen sulfide
HAP	Hazardous Air Pollutant
hr	Hour
ID	Identification Number
kg	Kilogram
lbs	Pounds
MACT	Maximum Achievable Control Technology
Mg	Megagram
MMBtu	Million British Thermal Units
mo	Month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NMHC	Non-methane hydrocarbons
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
pH	Negative logarithm of effective hydrogen ion concentration (acidity)
PM	Particulate Matter
PM_{10}	Particulate matter less than 10 microns in diameter
ppbvd	Parts per billion by volume, dry
ppm	Parts per million
ppmvd	Parts per million by volume, dry
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
psi	Pounds per square inch
psia	Pounds per square inch absolute
RAC	Southern Ute Indian Tribe/State of Colorado Environmental Commission's Reservation Air Code
RICE	Reciprocating Internal Combustion Engine
RMP	Risk Management Plan
scfm	Standard cubic feet per minute
SO_2	Sulfur Dioxide
SUIT	Southern Ute Indian Tribe
tpy	Ton(s) Per Year
Tribe	Southern Ute Indian Tribe
US EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

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I. Source Information and Emission Unit Identification

I.A. Source Information

Parent Company Name: BP America Production Company

Plant Name: Treating Site #2 Central Delivery Point

Plant Location: NE¼, NW¼ Section 20, T32N, R8W
Latitude: N 37.008517
Longitude: W -107.744849

Reservation: Southern Ute Indian Reservation

State: Colorado

County: La Plata County

Responsible Official: Onshore Site Manager, San Juan North

SIC Code: 1311

AFS Plant Identification Number: 08067U0009

Other Clean Air Act Permits: EPA issued PSD Permit # PSD-SU-0007-95.00 on July 31, 1997 which was later amended on June 9, 1999 and issued as PSD Permit # PSD-SU-0007-95.01. There are no other CAA permits issued to this facility.

Description of Process:

Treating Site #2 Central Delivery Point is a central facility used to separate and dry the gas and water recovered from the coal matrix reservoirs of the San Juan Basin of the Ignacio Blanco Fruitland field. The gas from coalbed methane wells enters the facility and passes through a slug catcher used for water and gas separation. The water that drops out is stored in water tanks. Each water tank has a tank heater used during the winter months to heat the water. The produced water is transferred offsite for disposal. After leaving the slug catcher, the produced gas is compressed before passing through two glycol dehydrator units equipped with natural gas-fired reboilers to further dry the gas. After dehydration, most of the gas is sent through a custody transfer sales meter to Red Cedar Gathering Company, while some of the gas is used by BP as fuel gas. The gas contains only a negligible amount of hydrogen sulfide (H_2S). Therefore, no H_2S removal is necessary.

The primary source of emissions are from the facility's two natural gas-fired four-stroke rich-burn (4SRB) spark ignition (SI) compressor engines, one natural gas-fired four-stroke lean-burn (4SLB) spark ignition (SI) compressor engine, one natural gas-fired 4SRB SI generator engine, , and two tri-ethylene glycol dehydrators.

I.B. Source Emission Points

Table 1 - Emission Units
BP America Production Company, Treating Site #2 Central Delivery Point

Emission Unit ID	Description	Control Equipment
TS2-1 TS2-2	2 - Waukesha L5790-GSI (4SRB SI) Compressor Engines, 1215 nameplate rated bhp Serial No.: 401231 Installed: 03/01/2011 Serial No.: 401229 Installed: 09/25/2007	NSCR & AFRC
TS2-9	1 - Waukesha L7042GL 4SLB SI Compressor Engine, 1,478 nameplate rated bhp Serial No.C-11346/3 Installed: 05/21/2010	None
TS2-13	1 – Caterpillar G3304NA 4SRB SI Generator Engine, 95 nameplate rated bhp Serial No.:N4F01129Installed: 09/2005	None
TS2-8b TS2-8c	20 MMscf/d Tri-ethylene Glycol (TEG) Dehydrator Regenerator Vent and Flash Tank Vent #1	None
TS2-10b	20 MMscf/d Tri-ethylene Glycol (TEG) Dehydrator Regenerator Vent #2	None
TS2-3*	1 – Waukesha VRG330 Generator Engine, 68 nameplate rated bhp Serial No.: NA Installed: removed	NA

*TS2-3 has been shut-down and permanently removed from the facility. However, this engine remains in the part 70 permit as it is still listed in the PSD permit for this facility.

Table 2 – Insignificant Emission Units
BP America Production Company, Treating Site #2 Central Delivery Point

Emission Unit ID	Description
TS2-4 & TS2-5	2 - 500 Mbtu/hr Tank Heaters
TS2-7	Fugitive Sources
TS2-8	1 - 350 Mbtu/hr Glycol Reboiler #1
TS2-10	1 - 850 Mbtu/hr Glycol Reboiler #2
TS2-10c	1 - Tri-ethylene Glycol (TEG) Dehydrator Flash Tank Vent #2
NA	10 - 48 Mbtu/hr Catalytic Space Heaters
NA	2 - 12 Mbtu/hr Catalytic Space Heaters
NA	1-18 Mbtu/hr Catalytic Space Heater
TS2-11	1 - 375 Mbtu/hr Tank Heater

	4 - 500 gal Lube Oil Tanks
	1 - 300 gal Lube Oil Tank
	1 - 35 bbl Used oil Tank
	3 - ≤ 90 bbl Used Oil Sumps
	1 - 35 bbl Tri-ethylene Glycol (TEG)/Produced Water Dehy Sump
	1 - 500 gal Ethylene Glycol (EG) Tank
	2 - 500 bbl Produced Water Tanks
	1 - Produced Water Pit Tank
	1 - 300 bbl Oily Water Tank
	2 - 500 gal Tri-ethylene Glycol (TEG) Tanks
*TS2-6	1 - 512 MBtu/hr Glycol Reboiler

* TS2-6 has been shut-down and permanently removed from the facility. However, this reboiler remains in the part 70 permit as it is still listed in the PSD permit for this facility.

II. Requirements for Engines

II.A. 40 CFR Part 63, Subpart A - National Emission Standards for Hazardous Air Pollutants for Source Categories, General Provisions [40 CFR 63.1 - 63.16, and RAC 4-103]

1. This facility is subject to the requirements of 40 CFR Part 63, Subpart A as outlined in Table 8 of 40 CFR Part 63, Subpart ZZZZ. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of 40 CFR Part 63 Subpart A.

[40 CFR 63.6665]

II.B. 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines [40 CFR 63.6580 - 63.6675 and RAC 4-103]

1. Treating Site #2 Central Delivery Point is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ for, existing non-emergency non-black start remote four-stroke rich-burn (4SRB) stationary reciprocating internal combustion engines (RICE) with a site rating of more than 500 brake horsepower located at an area source of hazardous air pollutants (HAPs), existing non-emergency non-black start four-stroke lean-burn (4SLB) remote stationary RICE with a site rating of more than 500 brake horsepower located at an area source of HAPs, and existing 4SRB RICE less than or equal to 500 brake horsepower located at an area source of HAPs. Notwithstanding conditions in this permit, the permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ.

2. 40 CFR Part 63, Subpart ZZZZ applies to the following engines:

   Unit TS2-1 – 1,196 site-rated bhp, Waukesha L5790-GSI natural gas-fired 4SRB engine, constructed or reconstructed prior to June 12, 2006;

Unit TS2-2 – 1,196 site-rated bhp, Waukesha L5790-GSI natural gas-fired 4SRB engine, constructed or reconstructed prior to June 12, 2006; and

Unit TS2-9 – 1,321 site-rated bhp, Waukesha L7042GLnatural gas-fired 4SLB engine, constructed or reconstructed prior to June 12, 2006; and

Unit TS2-13 –81 site-rated bhp, Caterpillar G3304NA natural gas-fired 4SRB generator engine, constructed or reconstructed prior to June 12, 2006.

II.B.2. 40 CFR Part 63, Subpart ZZZZ Work, Operation and Management Practices

1. For emission units TS2-1, TS2-2, TS2-9, and TS2-13, the permittee shall comply with the applicable 40 CFR Part 63, Subpart ZZZZ operating limitations and other requirements at all times.

[40 CFR 63.6605(a)]

2. For emissions unit TS2-1, TS2-2, and TS2-9, the permittee shall change the oil and filter and replace as necessary all spark plugs, hoses, and belts every 2,160 hours of operation or annually, whichever comes first. The permittee may utilize the oil analysis program option, as specified in Condition II.B.2.4. of this section, to extend the specified oil change requirement.

[40 CFR 63.6603(a) and Table 2d of Subpart ZZZZ]

3. For emissions units TS2-13, the permittee shall change the oil and filter and inspect and replace as necessary all spark plugs, hoses, and belts every 1,440 hours of operation or annually, whichever comes first. The permittee may utilize the oil analysis program option, as specified in Condition II.B.2.4. of this section, to extend the specified oil change requirement.

[40 CFR 63.6603(a) and Table 2d of 40 CFR, Subpart ZZZZ]

4. As specified in Conditions II.B.2.2. and II.B.2 3. of this section, for emissions units TS2-1, TS2-2, TS2-9, and TS2-13, the permittee shall have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of 40 CFR Part 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d of 40 CFR Part 63, Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2

business days of receiving the results of the analysis; if the engine is not in operation when the results of the of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(j)]

5. For emission units TS2-1, TS2-2, TS2-9, and TS2-13, the permittee shall operate and maintain the stationary RICE according to the manufacture's emission-related operation and maintenance instructions; or

6. Develop and follow the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engines in a manner consistent with good air pollution control practices for minimizing emissions.

[40 CFR 63.6640, 40 CFR 63.6625(e)(8), and Table 6 of 40 CFR 63, Subpart ZZZZ]

7. For emission units TS2-1, TS2-2, TS2-9, and TS2-13, during periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

[40 CFR 63.6603, 40 CFR 63.6625(h) and Table 2d of 40 CFR 63, Subpart ZZZZ]

8. At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions to the levels required by 40 CFR Part 63, Subpart ZZZZ. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if the required levels have been achieved. Determination of whether such operations and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.6605(b)]

II.B.3. 40 CFR Part 63, Subpart ZZZZ Continuous Compliance Requirements

1. The permittee shall demonstrate continuous compliance with the applicable operating limitations and other requirements in Table 2d according to the methods specified in Table 6 of 40 CFR Part 63, Subpart ZZZZ.

[40 CFR 63.6605(a) and 40 CFR 63.6640(a)]

2. The permittee must report each instance in which an operating limit was not met. These instances are deviations from the operating limitations and must be reported according to the reporting requirements of §63.6650(f) and the Facility-Wide Reporting Requirements section of this permit.

[40 CFR 63.6640(b) and RAC 2-110(7)]

II.B.4. 40 CFR Part 63, Subpart ZZZZ Notifications

1. The permittee must submit all of the notifications in §§63.7(b) and (c), §§63.8(e), (f)(4) and (f)(6), §§63.9(b) through (e), and (g) and (h) of the General Provisions of 40 CFR Part 63 that apply by the dates specified.

[40 CFR 63.6645(a)]

II.B.5. 40 CFR Part 63, Subpart ZZZZ Recordkeeping Requirements

1. The permittee must keep the following records to comply with the 40 CFR Part 63, Subpart ZZZZ operating limitations:

   (a) A copy of each notification and report that was submitted to comply with 40 CFR Part 63, Subpart ZZZZ.

   (b) Records of the occurrence and duration of each malfunction of operation (i.e. process equipment).

   (c) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process to its normal or usual manner of operation.

[40 CFR 63.6655(a)]

2. The permittee must keep the records required in Table 6 of 40 CFR Part 63, Subpart ZZZZ to show continuous compliance with each operating limitation that applies.

[40 CFR 63.6655(d)]

3. The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the stationary RICE are operated and maintained according to the manufacturer's or the permittee's own maintenance plan.

[40 CFR 63.6655(d) and (e), and Table 6 of 40 CFR 63, Subpart ZZZZ]

4. The permittee must keep each record in a form suitable and readily available for expeditious review, accessible in hard copy or electronic form at the BP Operations Center in Durango,

Colorado for five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[40 CFR 63.10(b)(1), 40 CFR 63.10(f), and 40 CFR 63.6660]

5. For TS2-1, TS2-2, and TS2-9 the permittee must keep a record of initial and annual evaluations of the remote status of the stationary RICE. The initial evaluation must indicate that the stationary RICE met the definition of remote stationary RICE in § 63.6675 as of the initial compliance date, October 19, 2013. The annual evaluations are thereafter required to be performed every 12 months. Within 1 year of any evaluation indicating the stationary RICE no longer meet the definition of remote stationary RICE the stationary RICE must comply with all of the requirements of 40 CFR 63, Subpart ZZZZ, for existing non-emergency spark ignition four-stroke rich-burn and four-stroke lean-burn stationary RICE with a site rating of more than 500 HP located at area sources of HAP that are not remote stationary RICE.

[40 CFR 63.6603(f)]

II.B.6. 40 CFR Part 63, Subpart ZZZZ Reporting Requirements

1. The permittee must report all deviations as defined in 40 CFR 63, Subpart ZZZZ in the semiannual monitoring report required under the Facility-Wide Reporting Requirements Section of this permit.

[40 CFR 63.6650(f) and 40 CFR 63.6640(e)]

II.C. 40 CFR Part 52.21 PSD Engine Requirements [PSD permit #PSD- SU-0007- 95.01 and RAC 2-110(6)(b) and 2-110(7)]

1. PSD permit # SU-0007- 95.01 applies to the following engines:

   Unit TS2-1 – 1,215 nameplate rated bhp, Waukesha L5790-GSI natural gas-fired 4SRB engine

   Unit TS2-2 – 1,215 nameplate rated bhp, Waukesha L5790-GSI natural gas-fired 4SRB engine

II.C.2. PSD Emission Limitations for Engines [PSD permit #PSD-SU-0007-95.01]

1. The permittee shall comply with the following emission limitations for units TS2-1 and TS2-2 at all times.

Table 2 - Engine Emissions Limits
BP America Production Company, Treating Site #2 Central Delivery Point

Unit ID	NO_x			CO		
	Emission Factor (g/hp-hr)	(lbs/hr)	(tpy)	Emission Factor (g/hp-hr)	(lbs/hr)	(tpy)
TS2-1	1.0	2.7	11.7	2.0	5.4	23.5
TS2-2	1.0	2.7	11.7	2.0	5.4	23.5

II.C.3. PSD Maintenance and Operation Requirements [PSD permit #PSD-SU-0007-95.01 and RAC 2-110(6)]

1. At all times, including periods of startup (except for replacement/overhauled engines), shut-down, and equipment malfunction, the facility, to the extent practical, shall be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to EPA or the Tribe, which may include, but not be limited to monitoring results, review of operating and maintenance procedures, manufacturer's specifications, industry practices, or inspection of the facility.

II.C.4 PSD Monitoring Requirements [PSD permit #PSD-SU-0007-95.01]

1. The permittee shall measure NOx and CO emissions from engines TS2-1 and TS2-2 at least once every semi-annual period (January 1–June 30 and July 1–December 31).

   (a) To meet the monitoring requirement above, the permittee shall measure the NOx and CO emissions from each engine using a portable analyzer and the monitoring protocol approved by EPA.

2. The permittee shall not conduct NOx and CO emissions monitoring on the engines identified in this permit that have not been operated during the specified monitoring period. The permittee must certify that the engine(s) did not operate during the specified monitoring period and maintain this certification in accordance with the recordkeeping requirements listed in this permit.

II.C.5. PSD Testing Requirements [PSD permit #PSD-SU-0007-95.01 and RAC 2-110(7)]

1. Compliance with the emissions limits of PSD Permit # PSD-SU-0007-95.01 for any engine type may be determined by emission tests, when required by EPA. The engine Testing Protocol, dated

October 29, 1997 and approved by EPA and used for the initial compliance tests shall be used by the permittee during any emission tests, unless the permittee chooses to use a different engine Testing Protocol. Any other engine Testing Protocols, not approved by EPA, must be submitted to EPA for approval prior to performing emissions tests.

2. These emissions tests shall be performed in accordance with the test methods specified in 40 CFR Part 60, Appendix A. EPA Reference Method 7 shall be used to measure NOx emissions and EPA Reference Method 10 shall be used to measure CO emissions, unless alternative methods are approved by the Administrator.

3. The permittee shall provide the Tribe and EPA with at least 30 (thirty) calendar days prior notice (in writing) of any emissions test required by this permit, in order to give the Tribe and EPA the opportunity to observe the test; unless a shorter timeframe is agreed upon by the permittee and EPA.

II.C.6. PSD Recordkeeping Requirements [PSD permit #PSD-SU-0007-95.01 and RAC 2-110(6)]

1. The permittee shall keep a record of all required emissions monitoring and compliance tests required in the PSD Monitoring Requirements section of this permit. The record shall include:

   (a) The date, place, and time of sampling or monitoring;

   (b) The date(s) the analyses were performed;

   (c) The company or entity that performed the analyses;

   (d) The analytical techniques or methods used;

   (e) The results of such analyses; and

   (f) The operating conditions that existed at the time of sampling or monitoring.

2. The permittee shall retain records of all required monitoring data and support information, reports, notifications, testing, monitoring, measurements, observations, and maintenance activities compiled in accordance with this permit for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or record. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. This data must be available at BP's Durango Operations Center for inspection by the Tribe and EPA and must be submitted to the Tribe and EPA upon request.

II.C.7. PSD Reporting Requirements [PSD permit #PSD-SU-0007-95.01 and RAC 2-110(7)]

1. The permittee shall submit a written report of any initial compliance test results for replacement/overhauled engines installed at the facility and for any engine compliance tests required by EPA. This emissions test report shall be submitted to the Tribe and EPA along with the next semi-annual monitoring results report due to be submitted and referenced in this section of this permit.

2. The permittee shall submit a written report containing all required emissions monitoring results for TS2-1, and TS2-2. This report shall be submitted semi-annually to the Tribe and EPA by April 1 and October 1 of each year. The reporting period for the April 1 report is July1 – December 31, and the reporting period for the October 1 report is January 1 – June 30. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with **Submissions** section of this permit.

3. Except for emission deviations from replacement/overhauled engines which are addressed in the **Alternative Operation Scenario – Engine Replacement/Overhaul for PSD Permitted Engines** section of this permit, the permittee shall keep a record of any excess emissions that occur during periods of startup, shut-down, equipment malfunction, or upset conditions, for any reason. Malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. For each occurrence of excess emissions, all of the following shall be provided to the Tribe and EPA in writing and submitted with the semi-annual reports:

   (a) The identity of the stack or emission point where excess emissions occurred;

   (b) The magnitude of excess emissions expressed in terms of permit conditions;

   (c) The time and duration of excess emissions;

   (d) The reason(s) for the excess emissions;

   (e) Steps and procedures taken to minimize excess emissions

   (f) Steps and procedures taken or anticipated to be taken to prevent reoccurrence of the excess emissions.

II.D. 40 CFR Part 64 Compliance Assurance Monitoring

1. The CAM requirements specified at 40 CFR Part 64 apply to the following emission units with respect to the NOx and CO emission limits identified in the PSD Permit Requirements section of this permit:

   Unit TS2-1 – 1,215 nameplate rated bhp, Waukesha L5790-GSI natural gas-fired 4SRB engine

   Unit TS2-2 – 1,215 nameplate rated bhp, Waukesha L5790-GSI natural gas-fired 4SRB engine

   [40 CFR 64.2(a)]

2. The permittee must be in compliance with the requirements of the CAM plan, provided as appendix B to this permit, within 180 days of the issuance date of this Part 70 operating permit.

   [40 CFR 64.4(e)]

3. Excursions, as defined in the CAM plan, shall be reported in accordance with the Facility-Wide Reporting Requirements section of this permit.

4. Operation of Approved Monitoring

   (a) At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

   [40 CFR 64.7(b)]

   (b) Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of these CAM requirements, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

   [40 CFR 64.7(c)]

(c) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

[40 CFR 64.7(d)(1)]

(d) Determination of whether the owner of operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d)(2)]

(e) After approval of the monitoring required under the CAM requirements, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Tribe and, if necessary submit a proposed modification for this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

5. Based on the results of a determination made under §64.7(d)(2) and Condition 4.d. above, the Tribe or EPA may require the permittee to develop and implement a Quality Improvement Plan (QIP) in accordance with §64.8.

[40 CFR 64.8(a)]

6. The permittee shall submit monitoring reports in accordance with §64.9(a) for CAM requirements on a semi-annual basis to the Tribe as specified in the Facility-Wide Reporting Requirements section in this permit.

[40 CFR 64.9(a)]

7. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP required pursuant to Condition 5 above and any activities undertaken to implement at QIP, and other supporting information required to be maintained under Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions as specified in §64.9(b).

[40 CFR 64.9(b)]

II.E Periodic Monitoring, Recordkeeping, and Reporting Requirements [RAC 2-110(5), RAC 2-110(6) and RAC 2-110(7)]

1. The permittee shall be in compliance with the following periodic monitoring, recordkeeping and reporting requirements in Section II.E. of this permit upon issuance of this Part 70 operating permit and for a period not to exceed180 days from permit issuance, after which time the requirements will no longer apply and the permittee must be in compliance with the CAM plan requirements outlined in the **40 CFR 64 Compliance Assurance Monitoring** section of this permit and **Appendix B**, per 40 CFR 64.4(e). If the permittee complies with the requirements of the CAM plan prior 180 days from permit issuance, the requirements in Section II.E. will no longer apply. The permittee must submit a notification to the Tribe certifying the date that BP begins complying with the CAM plan.

2. The periodic monitoring, recordkeeping and reporting requirements apply to the following emission units:

   (a) Unit TS2-1 – 1,215 nameplate rated bhp, Waukesha L5790-GSI 4SRB natural gas-fired engine

   (b) Unit TS2-2 – 1,215 nameplate rated bhp, Waukesha L5790-GSI 4SRB natural gas-fired engine

II.E.2 Periodic Monitoring Requirements [RAC 2-110(5)]

1. The permittee shall conduct the following additional monitoring and maintenance activities at least once every calendar quarter unless the engine runs less than half of the quarter. If the engine runs less than half of the quarter, the permittee may choose to perform the following once every 2190 hours of run-time:

   (a) Measure exhaust back pressure;

   (b) Measure differential pressure and temperature across the catalytic converter;

(c) Replace oxygen sensors;

(d) Inspect and lubricate air/fuel ratio control valves; and

(e) Measure concentrations of CO and NOx in exhaust.

If these monitoring and maintenance activities cannot be performed on one of the controlled engines during any quarter, the reason preventing the activities shall be reported in the next semi-annual report required under the General Reporting Requirements section of this permit.

[RAC 2-110(5)(a) through (c)]

II.E.3 Recordkeeping Requirements [RAC 2-110(6)]

1. The permittee shall keep a record of all required emissions monitoring, parametric monitoring and maintenance activities required in Section II.E.2. of this permit. The record shall include:

   (a) The date, place, and time of sampling or monitoring;

   (b) The date(s) the analyses were performed;

   (c) The company or entity that performed the analyses;

   (d) The analytical techniques or methods used;

   (e) The results of such analyses; and

   (f) The operating conditions that existed at the time of sampling or monitoring.

2. The permittee shall retain records of all required monitoring data and support information, reports, notifications, testing, monitoring, measurements, observations, and maintenance activities compiled in accordance with this permit for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or record. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. This data must be available at BP's Durango Operations Center for inspection by the Tribe or EPA and must be submitted to the Tribe or EPA upon request.

[RAC 2-110(6)(b)]

II.E.4 Reporting Requirements [RAC 2-110(7)]

1. The permittee shall submit a written report containing all required emissions and parametric monitoring results and maintenance activities records required in Section II.E.2. of this permit. This report shall be submitted semi-annually to the Tribe by April 1st and October 1st of each year.

The reporting period for the April 1st report is July 1st – December 31st, and the reporting period for the October 1st report is January 1st – June 30th. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Submissions section of this permit.

III. Facility-Wide Requirements

Conditions in this section of the permit apply to all emissions units located at the facility, including any units not specifically listed in Table 1 or Table 2 of the Source Emission Points section of this permit.

[RAC 2-110(1)(d)]

III.A. General Recordkeeping Requirements [RAC 2-110(6) and RAC 4-103]

The permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the permittee determines that his or her stationary source that emits (or has the potential to emit, without federally recognized controls) one or more hazardous air pollutants is not subject to a relevant standard or other requirement established under 40 CFR part 63, the permittee shall keep a record of the applicability determination at BP's Durango Operations Center for a period of five years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the permittee believes the source is unaffected (e.g., because the source is an area source).

   [40 CFR 63.10(b)(3)]

2. Records shall be kept of off permit changes made, as required by the Off Permit Changes section of this permit.

3. The permittee is the owner or operator of glycol dehydration units (Units TS2-7b and TS2-10b) that are exempt from the control requirements under 40 CFR §63.764. The permittee shall retain each determination used to demonstrate that actual annual average flowrate of natural gas to each glycol dehydrator is less than 85,000 scm/day (3,000,000 scf/day) or the actual average benzene emissions from each glycol dehydrator are below 1 tpy.

   [40 CFR 63.764(e)(1), 63.772(b)(2), and 63.774(d)(1)]

III.B. General Reporting Requirements

1 The permittee shall submit to the Tribe all reports of any required monitoring under this permit semiannually, by April 1 and October 1 of each year. The report due on April 1 shall cover the

July 1 - December 31 reporting period of the previous calendar year. The report due on October 1 shall cover the January 1 - June 30 reporting period of the current calendar year. The initial report shall cover the period from the issuance date of this permit through the end of the relevant semi-annual reporting period. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the **Submissions** section of this permit. [RAC 2-110(7)(a)]

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with RAC 2-110(5) and (6). For a situation lasting more than 24 hours which constitutes a deviation, each 24 hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

   (a) A situation where emissions exceed an emission limitation or standard;

   (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

   (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

   (d) A situation in which an exceedance or an excursion, as defined in 40 CFR Part 64 occurs.

   [RAC 1-103(21)]

3. The permittee shall promptly report to the Tribe deviations from permit requirements, (including emergencies), including the date, time, duration, and the probable cause of such deviations, the quantity and pollutant type of excess emissions resulting from the deviation, and any preventative, mitigation, or corrective actions or measures taken. "Prompt" is defined as follows:

   (a) Where the underlying applicable requirement contains a definition of "prompt" or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern.

   (b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

      (i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made by email, telephone, verbal, or facsimile

communication by the close of business the next working day, upon discovery of the occurrence, and in writing within 10 working days from the occurrence;

(ii) For emissions of any regulated air pollutant, excluding those listed in RAC § 2-110(7)(b)(i), that continue for more than 2 hours in excess of permit requirements, the report must be made by email, telephone, verbal, or facsimile communication by the close of business the next working day, upon discovery of the occurrence, and in writing within 10 working days from the occurrence;

(iii) For all other deviations from permit requirements, the report shall be contained in the report submitted with the semi-annual monitoring report.

[RAC 2-110(7)(b)]

III.C. Alternative Operating Scenarios-Engine Replacement for Non-PSD Permitted Engines [RAC 2-110(8)]

1. Replacement of an existing engine identified in this permit shall be allowed as an off-permit change pursuant to the Off Permit Changes provisions of this permit provided all of the following conditions are met:

(a) The engine replacement is not subject to any requirements under Title IV of the Clean Air Act and is not a modification under Title I of the Clean Air Act;

(b) The replacement engine is of the same make, model, horsepower rating, and configured to operate in the same manner as the engine being replaced.

(c) The replacement engine meets all applicable requirements identified in this permit that apply to the existing engine being replaced.

(d) All applicable requirements that apply to the replacement engine are already identified in the permit. Replacement of an existing engine identified in this permit with a new, modified, or reconstructed engine must utilize a Minor Permit Revision as specified in RAC 2-111(3) or a Significant Permit Revision as specified in RAC 2-111(4) to incorporate any new applicable requirements. The applicable requirements include, but may not be limited to:

(i) Standards of Performance for Stationary Spark Ignition Internal Combustion Engines at 40 CFR Part 60, Subpart JJJJ;

(ii) Standards of Performance for Stationary Compression Ignition Internal Combustion at 40 CFR Part 60, Subpart IIII;

(iii) National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines at 40 CFR Part 63, Subpart ZZZZ;

(iv) Requirements established in a permit or permits issued pursuant to the Federal Minor New Source Review Program in Indian Country at 40 CFR Part 49;

(v) Requirements established in a permit or permits issued pursuant to the Prevention of Significant Deterioration of Air Quality Program at 40 CFR Part 52; or

(vi) Requirements established in any promulgated Federal Implementation Plan that may apply to engines located on the Southern Ute Indian Reservation.

2. The Permittee shall provide contemporaneous written notice to the Tribe and the Administrator of any replacement of an existing engine identified in this permit. Such notice shall state when the replacement occurred and shall describe the change and any applicable requirement that would apply as a result of the change.

3. The Permittee shall keep a record of the engine replacement.

III.D. Alternative Operating Scenario – Engine Replacement/Overhaul for PSD Permitted Engines [40 CFR 52.21 PSD Permit # PSD-SU-0007-95.01]

1. The permittee may replace an existing PSD permitted engine requiring a complete overhaul with a new or overhauled engine of the same make, model, horsepower rating, and configuration. Such a like-kind replacement engine will be configured for operation in the same manner as the engine being replaced. Each like-kind replacement engine shall have equivalent types of air emissions control devices installed as the engine being replaced including, but not limited to, non-selective catalytic reduction (NSCR) devices and air-to-fuel ratio controllers.

2. The permittee shall be allowed to operate the replacement/overhauled engine without the use of the catalytic converter assembly for a period not to exceed 200 hours from engine startup, unless a longer time period has been approved by EPA, in writing. The permittee shall keep a record of the number of hours of operation of the uncontrolled replacement/overhauled engine and submit this information to EPA with the initial compliance demonstration test report per the Reporting Requirements section of this permit.

3. The permittee shall note if an engine is a replacement/overhauled unit in the semi-annual monitoring report. The compliance demonstration shall measure NOx and CO emissions from the replaced/overhauled engine using a portable analyzer and a monitoring protocol approved by EPA. This demonstration shall be conducted within 60 (sixty) calendar days of engine start-up.

4. The permittee shall provide notice to EPA of such compliance demonstration testing in accordance with the provisions of the Testing Requirements section of this permit. The permittee shall adhere to the recordkeeping and reporting requirements of this permit for the compliance demonstration of the replacement/overhauled engine.

III.E. Permit Shield [RAC 2-110(10)(c)]

Nothing in this permit shall alter or affect the following:

1. The provisions of Section 303 of the Clean Air Act, 42 U.S.C. § 7603 concerning emergency powers, including the respective authorities of the Administrator under those sections.

2. The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;

3. The ability of the Administrator respectively to obtain information from a source pursuant to Section 114 of the Clean Air Act, 42 U.S.C. § 7414.

[RAC 2-110(10)(c)]

III.F. Prevention of Significant Deterioration [40 CFR 52.21]

This facility is a major stationary source (potential to emit of any criteria pollutant > 250 tpy or CO_2-e > 100,000 tpy) for the purposes of PSD requirements (40 CFR 52.21). Future modifications to this facility which meet the definition of "major modification" in 40 CFR 52.21(b)(2) would require that Treating Site #2 Central Delivery Point first obtain a pre-construction permit pursuant to federal regulations.

IV. Part 70 Administrative Requirements

IV.A. Annual Fee Payment [RAC 2-110(1)(h) and RAC 2-118]

1. An annual operating permit emission fee shall be paid to the Tribe by the permittee.

[RAC 2-118(2)]

2. The permittee shall pay the annual permit fee each year no later than April 1st for the preceding calendar year, except that the first annual permit fee will cover the period from the issuance date of this permit through December 31 of the same year.

[RAC 2-118(2)]

3. Fee payments shall be remitted in the form of a money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the Southern Ute Indian Tribe and sent or delivered to the Tribe, c/o Air Quality Program, P.O. Box 737 MS #84, Ignacio, Colorado 81137, or by

common carrier (such as UPS or FedEx) c/o Environmental Programs Division Air Quality Program, 398 Ouray Drive, Ignacio, Colorado 81137.

[RAC 2-118(4)(a)]

4. The permittee shall send an updated fee calculation worksheet submitted annually by the same deadline as required for fee payment to the address listed in the **Submissions** section of this permit.

[RAC 2-118]

5. Basis for calculating annual fee:

(a) Subtotal annual fees shall be calculated by multiplying the applicable emission fee set pursuant to RAC § 2-119(1) times the total tons of actual emissions, as defined at RAC 1-103(2), for each fee pollutant. The permittee may, in absence of actual emissions data, calculate the annual fee based on the potential to emit (as defined at RAC 1-103(51)) for each fee pollutant. Emissions of any regulated air pollutant that already are included in the fee calculation under a category of regulated pollutant, such as a federally listed hazardous air pollutant that is already accounted for as a VOC or as PM10, shall be counted only once in determining the source's actual emissions.

[RAC 2-119(2)(a)]

(i) Actual emissions shall be computed using compliance methods required by the permit.

[RAC 2-118(1)(b)]

(ii) If actual emissions cannot be determined using the compliance methods in the permit, the permittee shall use other federally recognized procedures.

[RAC 2-118(1)(b)]

(b) The total annual fee submitted shall be the greater of the applicable minimum fee or the sum of subtotal annual fees for all fee pollutants emitted from the source.

[RAC 2-119(2)(b)]

[Explanatory note: The applicable emission fee amount and applicable minimum fee (if necessary) are revised each calendar year to account for inflation, and they are available from AQP prior to the start of each calendar year.]

(c) The permittee shall exclude the following emissions from the calculation of fees:

(i) The amount of actual emissions of any one fee pollutant that the source emits in excess of 4,000 tons per year

(ii) Any emissions that come from insignificant activities not required in a permit application pursuant to RAC § 2-106(4).

[RAC 1-103(2)(c)]

6. Annual fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[RAC 2-105 and RAC 2-118(2)(c)]

7. Failure of the permittee to pay fees by the due date shall subject the permittee to assessment of penalties and interest in accordance with RAC § 2-118(6).

[RAC 2-118(6)]

8. When notified by the Tribe of underpayment of fees, the permittee shall remit full payment within 30 days of receipt of an invoice from the Tribe.

[RAC 2-119(3)(b)]

9. A permittee who thinks a Tribe assessed fee is in error and who wishes to challenge such fee shall provide a written explanation of the alleged error to the Tribe along with full payment of the assessed fee.

[RAC 2-119(3)(c)]

IV.B. Compliance Requirements

1. Compliance with the Permit

(a) The permittee must comply with all conditions of this part 70 permit. Any permit noncompliance with federally enforceable or Commission-only permit conditions constitutes a violation of the RAC and Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

[RAC 2-110(3)(a)]

(b) It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

[RAC 2-110(3)(b)]

(c) All terms and conditions of this permit which are required under the Clean Air Act or under any of its applicable requirements, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Clean Air Act, except terms and conditions the permit specifically designates as not being

federally enforceable under the Clean Air Act that are not required under the Clean Air Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of RAC §§ 2-108, 2-111, 2-112, other than those contained in this paragraph.

[RAC 2-110(3)(f)]

(d) This permit, or the filing or approval of a compliance plan, does not relieve any person from civil or criminal liability for failure to comply with the provisions of the RAC and the Clean Air Act, applicable regulations thereunder, and any other applicable law or regulation.

[RAC 2-110(3)(g)]

(e) For the purpose of submitting compliance certifications in accordance with the Compliance Certifications condition below of this permit, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[Section 113(a) and 113(e)(1) of the Act, 40 CFR §§ 51.212, 52.12, 52.33, 60.11(g), and 61.12]

2. Compliance Certifications

The permittee shall submit to the Tribe and the Administrator an annual certification of compliance which shall certify the source's compliance status with all permit terms and conditions and all applicable requirements relevant to the source, including those related to emission limitations, standards, or work practices. The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with RAC § 2-110(9)(a). The certification of compliance shall be submitted annually by April 1st and shall cover the preceding calendar year in which the certification of compliance is due.

[RAC 2-110(9)(c)]

3. Compliance Schedule

(a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.

[RAC 2-106(4)(l)(ii)]

(b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

[RAC 2-106(4)(l)(iii)]

IV.C. Duty to Provide and Supplement Information [RAC 2-110(7)(e), 2-106(5), and 2-124]

1. The permittee shall furnish to the Tribe, within the period specified by the Tribe, any information that the Tribe requests in writing to determine whether cause exists for reopening and revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Tribe copies of records that are required to be kept by the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of RAC 2-124.

2.

[RAC 2-110(7)(e) and RAC 2-124]

3. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application or in a supplemental submittal, shall promptly submit such supplementary facts or corrected information. In addition, a permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

[RAC 2-106(5)]

IV.D. Submissions [RAC 2-105]

1. Any application, form, report, compliance certification, or other document submitted by the permittee under this permit shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Explanatory note: The Tribe has developed a reporting form "CTAC" for certifying truth, accuracy and completeness of part 70 submissions. The form may be found on the AQP's website (http://www.southernute-nsn.gov/environmental programs/air-quality).

2. Except where otherwise noted, any documents required to be submitted under this permit, including reports, test data, monitoring data, notifications, compliance certifications, fee calculation worksheets, and applications for renewals and permit modifications shall be submitted:

by United States Postal Service:	or by Common Carrier:
Part 70 Program Environmental Programs Division Air Quality Program P.O. Box 737 MS #84 Ignacio, Colorado 81137	Part 70 Program Environmental Programs Division Air Quality Program 398 Ouray Drive Ignacio, CO 81137

IV.E. Severability Clause [RAC 1-106 and RAC 2-110(1)(f)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any provision is held invalid, the remaining permit conditions shall remain valid and in force.

IV.F. Permit Actions [RAC 2-110(3)]

1. This permit may be modified, reopened and revised, revoked and reissued, or terminated for cause.

[RAC 2-110(3)(c)]

2. The filing by the permittee of a request for a permit revision, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition.

[RAC 2-110(3)(d)]

IV.G. Administrative Permit Revision [RAC 2-111(2)]

1. The permittee may submit an application for an administrative permit revision as defined in RAC § 1-103.

[RAC 2-111(2)(a)]

2. The permittee may implement an administrative permit revision immediately upon submittal of the request for the administrative revision.

[RAC 2-111(2)(c)]

[Note to permittee: If the provisions allowing for an administrative permit revision do not apply, please contact the Air Quality Program for a determination of similarity prior to submitting your request for an administrative permit revision.]

IV.H. Minor Permit Revisions [RAC 2-111(3)]

1. The permittee may submit an application for a minor permit revision as defined in RAC § 1-103.

2. An application requesting the use of minor permit revision procedures shall meet the requirements of RAC § 2-106(4) and shall include the following:

   (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

(b) If changes are requested to the permit language, the permittee's suggested draft permit changes ;

(c) Certification by a responsible official, consistent with RAC § 2-105, that the proposed revision meets the criteria for use of minor permit revision procedures and a request that such procedures be used; and

(d) Completed forms for the Tribe to use to notify the Administrator and affected programs as required under RAC § 2-108

(e) If the requested permit revision would affect existing compliance plans or schedules, related progress reports, or certification of compliance requirements, and an outline of such effects.

[RAC 2-111(3)(a)]

3. The permittee shall not submit multiple minor permit revision applications that may conceal a larger revision that would not constitute a minor permit revision.

[RAC 2-111(3)(b)]

4. The permittee may make the change proposed in its minor permit revision application immediately after it files such application, provided, however, for sources that have previously utilized this provision during the term of the permit and, on two or more occasions have failed to file a complete application, may thereafter make the change only after the application is deemed complete. After the permittee makes the change and until the Tribe takes any of the actions specified in the following subsection, the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the permittee need not comply with the existing permit terms and conditions it seeks to modify. If the permittee fails to comply with its proposed permit terms and conditions during this period, however, the existing permit terms and conditions it seeks to modify may be enforced against it.

[RAC 2-111(3)(e)]

5. The permit shield under RAC § 2-110(10) does not extend to minor permit revisions.

[RAC 2-110(10)(d)]

IV.I. Significant Permit Revisions [RAC 2-111(4)]

1. The permittee must request the use of significant permit revision procedures as defined in RAC § 1-103.

2. Significant permit revisions shall meet all requirements of the RAC for permit issuance and renewal, including those for applications, review by the Administrator and affected programs, and public participation.

[RAC 2-111(4), 2-109, and 2-106(3)]

IV.J. Permit Reopenings, Revocations and Reissuances, and Terminations [RAC 2-112]

1. The permit may be reopened and revised for any of the reasons listed in paragraphs (a) through (d) below. Alternatively, the permit may be revoked and reissued for the reasons listed in paragraphs (c) and (d) below:

   (a) Additional requirements under the Clean Air Act become applicable to a major source with a remaining permit term of 3 or more years, provided that the Tribe shall revise such permits to incorporate such additional requirements no later than 18 months after promulgation of such requirements, and no such reopening is required if the effective date of the requirement is later than the permit expiration date unless the original permit or any of its terms or conditions have been extended past the permit expiration date pursuant to RAC § 2-104(2)(b)(iii);

   (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

   (c) The Tribe or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the terms or conditions of the permit; or

   (d) The Tribe or the Administrator determines that the permit must be revised or revoked and reissued to assure compliance with applicable requirements.

2. The permit may be terminated for any of the reasons in (a) through (g) below:

   (a) The permittee fails to meet the requirements of an approved compliance plan;

   (b) The permittee has been in significant or repetitious noncompliance with the operating permit terms or conditions;

   (c) The permittee has exhibited a history of willful disregard for environmental laws of any tribal or state authority, or of the United States;

   (d) The permittee has knowingly misrepresented a material fact in any application, record, report, plan, or other document filed or required to be maintained under the permit;

(e) The permittee falsifies, tampers with, or renders inaccurate any monitoring device or method required to be maintained under the permit;

(f) The permittee fails to pay fees required under RAC§§ 2-118 and 2-119; or

(g) The Administrator has found that cause exists to terminate the permit.

IV.K. Property Rights [RAC 2-110(3)(e)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

IV.L. Inspection and Entry [RAC 2-110(9)(b)]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Tribe or other authorized representative to perform the following:

1. Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

4. As authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

IV.M. Emergency Situations [RAC 2-117]

1. The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency as defined in RAC § 1-103. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

   (a) An emergency occurred and that the permittee can identify the cause(s) of the emergency;

   (b) The permitted facility was at the time being properly operated;

(c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and

(d) The permittee reported the emergency to the Tribe in compliance with RAC § 2-110(7).

[RAC 2-117(1)]

2. In any enforcement preceding the permittee attempting to establish the occurrence of an emergency has the burden of proof.

[RAC 2-117(2)]

3. This emergency situation provision is in addition to any emergency or upset provision contained in any applicable requirement.

[RAC 2-117(3)]

IV.N. Permit Transfers [RAC 2-113]

This permit shall not be transferable, by operation of law or otherwise, from one location to another or from one source to another, except that a permit may be transferred from one location to another in the case of a portable source that has notified the Tribe in advance of the transfer, pursuant to the RAC. A permit for a source may be transferred from one person to another if the Tribe finds that the transferee is capable of operating the source in compliance with the permit. This transfer must be accomplished through an administrative permit revision in accordance with the Administrative Permit Revisions section of this permit.

IV.O. Off-Permit Changes [RAC 2-116(2)]

1. The permittee is allowed to make, without a permit revision, certain changes that are not addressed or prohibited by this permit provided that the following requirements are met:

(a) Each such change meets all applicable requirements and shall not violate any existing permit term or condition;

(b) Such changes are not subject to any requirements under title IV of the Clean Air Act and are not modifications under title I of the Clean Air Act;

(c) Such changes are not subject to permit revision procedures under RAC § 2-111; and

(d) The permittee provides contemporaneous written notice to the Tribe and the Administrator of each such change, except for changes that qualify as insignificant activities. Such notice shall state when the change occurred and shall describe the change, any resulting emissions

change, pollutants emitted, and any applicable requirement that would apply as a result of the change.

[RAC 2-116(2)(a)]

2. The permit shield does not apply to changes made under this provision.

[RAC 2-110(10)(d)]

3. The permittee shall keep a record describing changes made at the source that result in emissions of any regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

[RAC 2-116(2)(b)]

4. The notice shall be kept at BP's Durango Operations Center and made available to the Tribe on request, in accordance with the general recordkeeping provision of this permit.

5. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the replacement of any one {emission unit type}, or by replacement of multiple {emission unit type}.

IV.P. Permit Expiration and Renewal [RAC §§ 2-104(3), 2-106(2)(b), 2-107(7)(a), 2-107(7)(b), 2-110(1)(a), and 2-106(3)]

1. This permit shall expire five years from the effective date of this permit.

[RAC 2-110(1)(a)]

2. Expiration of this permit terminates the permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.

[RAC 2-107(7)(b)]

3. If the permittee submits a timely and complete permit application for renewal, consistent with RAC § 2-106 but the Tribe has failed to issue or disapprove a renewal permit before the end of the permit term, then the permit shall not expire and all its terms and conditions shall remain in effect until the renewal permit has been issued or disapproved.

[RAC 2-104(2)(b)]

4. The ability to operate under this permit shall cease if (1) the Tribe takes final action to deny or issue the permittee a renewal permit or deny the permittee a permit or (2) the permittee fails to

submit by the deadline specified in writing by the Tribe any additional information identified as being needed to process the application.

[RAC 2-104(3)]

5. Renewal of this permit is subject to the same procedures, including those for public participation and affected program and EPA review, as those that apply to initial permit issuance.

[RAC 2-107(7)(a)]

6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

[RAC 2-106(4)(e)(ix)]

V. Appendix

V.A. Inspection Information

1. Driving Directions to the facility:

   Drive north on US 550 past the Colorado State line to approximately mile marker 4.6 and turn right on CR 318/310. Follow county road (paved) to approximately mile marker 2.8. Turn right onto dirt road and go approximately ¼ mile to Red Cedar Compressor Station. Turn left and travel approximately 4.5 miles to "crowsfoot" intersection. Turn right (south) going past Red Cedar Arkansas Loop Plant approximately 4 miles. Turn left (east) traveling approximately 2.1 miles to Treating Site #2 Central Delivery Point.

2. Global Positioning System (GPS):

   Latitude: 37.008517
   Longitude: -107.744849

3. Safety Considerations:

   BP recommends all visitors to the Treating Site #2 Central Delivery Point wear a hard hat, safety glasses, safety footwear, hearing protection, and fire retardant clothing.

V.B. Compliance Assurance Monitoring (CAM) Plan

A. Background

1. Emission Unit

Description: 4-stroke rich-burn natural gas compressor engines.

Identification: TS2-1, TS2-2.

Facility: Treating Site #1 CDP, Southern Ute Indian Reservation, La Plata County, Colorado.

2. Applicable Regulation, Emissions Limits and Pre-CAM Monitoring Requirements

Applicable Regulation: PSD Permit # PSD-SU-0007-95.01

Emission limits: NOx: 2.7 lbs/hr; 11.7 TPY
CO: 5.4 lbs/hr; 23.5 TPY

Monitoring Requirement: Semi-annual NOx and CO portable analyzer emission measurement

3. Control Technology and Potential to Emit

Controls: Non-selective catalytic reduction

Potential pre-control device emissions[1]: NOx: 48.2 lbs/hr; 211 TPY
CO: 75.0 lbs/hr; 328.5 TPY

Potential post-control device emissions[2]: NOx: 2.7 lbs/hr; 11.7 TPY
CO: 5.4 lbs/hr; 23.5 TPY

[1] Based on the BACT engine emission factors used to calculate the PSD Permit PSD-SU-0007-95.01 lb/hr and TPY emission limits

[2] Using worst-case emission factors from Waukesha Engine Emissions Discussion, dated 7/20/95, for VHP GSI engine. Uncontrolled NOx emissions differ compared to PSD Permit PSD-SU-0007-95.00 uncontrolled emissions since 18.0 g/hp-hr used above rather than 7.0 g/hp-hr. Using 2.0 g/hp-hr for VOC

B. Monitoring Approach

The key elements of the monitoring approach are presented in the attached table. Additionally, within 60 days of installing a new catalyst, portable analyzer emission monitoring will be performed to demonstrate compliance with emission limitations.

C. Response to Excursion

Excursions of differential pressure across the catalyst will be verified and emissions will be monitored with a portable analyzer. Excursions of NOx or CO levels during semiannual emission monitoring will trigger investigation, verification, immediate shutdown, and possible corrective action.

MONITORING APPROACH: Treating Site #2 CDP Catalytic Converters TS2-2, TS2-2

	Indicator No. 1	Indicator No. 2	Indicator No. 3
I. Indicator	Temperature of exhaust gas into the catalyst.	Pressure differential across the catalyst.[1]	NOx and CO measurement.[2]
A. Measurement Approach	Exhaust gas temperature is monitored continuously using a temperature sensing device.	The pressure differential between the inlet and outlet of the catalyst is measured with a differential pressure gauge.	NOx and CO are measured using an approved portable monitoring protocol or EPA Reference Methods.
II. Indicator Range	Temperature at the inlet of the catalyst shall be maintained at less than or equal to1250^0 F.	An excursion is defined as a pressure differential change of more than 2 inches of water as compared to the pressure differential measured during the most recent NOx and CO emission measurement that showed compliance with limits.	NOx above 2.7 lbs/hr, or CO above 5.4 lbs/hr.
III. Performance Criteria A. Data Representativeness	Temperature is measured at the inlet of the catalyst by a temperature sensing device.	Pressure differential is measured at the inlet and outlet of the catalyst.	Gases are measured at the exhaust of the catalyst under normal operating conditions.
B. QA/QC Practices and Criteria	Temperature sensing device is calibrated per manufacturer's specifications.	The pressure gauge is calibrated per manufacturer's specifications, at least yearly.	As stated in approved portable monitoring protocols or EPA Reference Methods.

C. Monitoring Frequency	Temperature is monitored continuously by an automatic system designed to perform engine shutdown when catalyst temperature exceeds 1250^0 F.	Pressure differential is monitored at least once per calendar month. No monitoring is required for months when engine is not operated.	Semi-annual monitoring to verify compliance with permitted emission limits. If the engine runs less than 2190 hours per monitoring period, monitoring will be performed at least once every 4380 runtime hours.
D. Data Collection Procedures	Records of all temperature exceedances and temperature sensing device calibration and maintenance shall be retained at BP's Durango Operations Center.	Pressure differential data will be recorded at least once per month. A note will be made on months when engine is not operated.	As specified in approved portable monitoring protocols or EPA Reference Methods.
E. Averaging Period	Averaging is not necessary since the temperature sensing device will operate continuously.	None.	None.

1. Benchmark values for catalyst inlet pressure drop over the catalyst bed will be established as the first readings following permit issuance. Benchmarks will be set similarly for newly installed catalysts. Within 60 days of installing a new catalyst, portable analyzer emissions monitoring will be performed to demonstrate compliance with emission limits.

2. Indicator No 3 monitoring requirements were derived from the PSD permit for BP TS#2 CDP (PSD Permit # PSD-SU-0007-95.01).

JUSTIFICATION

I. Background

The monitoring approach outlined here applies to the 3-way non-selective catalytic reduction (NSCR) systems used on rich-burn natural gas fired compressor engines TS2-1 and TS2-2. The NSCR systems lower NOx, CO, CH2O, and hydrocarbon emissions. The catalyst systems are passive units and do not have mechanical components.

II. Rationale for Selection of Performance Indicators

Temperature of exhaust gas into the catalyst is measured continuously because temperature excursions can be indicative of problems with engine operations that can lead to poor catalyst performance. An exhaust gas temperature that is too high can indicate engine problems that can damage the catalyst unit. Monitoring of inlet gas temperatures to the catalyst will help assure proper operation of the catalyst.

Pressure differential across the catalyst is measured monthly because a significant pressure change from the reference pressure differential can indicate the unit is physically damaged. Decreased pressure differential can indicate channeling or other problems. Increased pressure differential can indicate fouling or plugging of the catalyst.
Semi-annual NOx and CO emission monitoring are conducted to ensure compliance with permitted emissions limits and to determine if the catalyst system is chemically damaged. Emission monitoring measurements must be conducted using an approved portable monitoring protocol or Reference Methods.

III. Rational for Selection of Indicator Ranges

An exhaust gas temperature range of less than or equal to 1250^0 F has been selected based upon the catalyst manufacturer's suggested operating parameters for optimal chemical reaction and this company's field experience. This is also the temperature range that is a required operating limitation for rich burn, catalytically controlled engines subject to the reciprocating internal combustion engine (RICE) NESHAP.

Monitoring for a pressure differential across the catalyst that does not deviate by more than 2 inches of water column from the operating limitation established during the performance test (reference pressure differential) is based on the RICE NESHAP requirements for catalytically controlled rich-burn engines. Studies have found that a pressure differential that deviates less than 2 inches of water column from the reference pressure differential measured during most recent NOx and CO emission monitoring test showing compliance with permitted limits, indicates the catalyst is in good operable condition to ensure compliance with the permitted limits. Deviations in excess of 2 inches of water column indicate that the catalyst may be fouled, plugged, or damaged. Benchmark values for catalyst inlet pressure drop over the catalyst bed will be established as the first readings following permit issuance. Benchmarks will be set similarly for newly installed catalysts. Within 60 days of installing a new catalyst, portable analyzer emissions monitoring will be performed to demonstrate compliance with emission limits.

Semi-annual monitoring to verify compliance with permitted limits for NOx and CO is a required continuous compliance requirement for the rich-burn catalytically controlled engines TS2-1 and TS2-2 in the BP TS#2 CDP PSD permit. NOx and CO must be measured using an approved portable monitoring protocol or EPA Reference Method. A measurement of NOx above 2.7 lbs/hr or CO above 5.4 lbs/hr will indicate an exceedance of the permitted limits.