

**Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No. V-SUIT-0050-2014.01
Minor Permit Revision
March 1, 2016**



**BP America Production Company
Iron Horse Central Delivery Point
Southern Ute Indian Reservation
La Plata County, Colorado**

Description of Permit Revision

On December 2, 2015, the Southern Ute Indian Tribe Air Quality Program (AQP) received a minor permit revision application from BP America Production Company (BP) for the Iron Horse Central Delivery Point. BP requested permit revisions to incorporate applicable requirements for two newly affected facilities under 40 CFR Part 60, Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution (NSPS OOOO).

It was determined by BP that reconstruction, as defined in 40 CFR §60.15, was triggered for two Ariel JGD-4 reciprocating compressors as a result of recent cylinder replacements made on the units. This reconstruction triggered the applicable requirements under 40 CFR Part 60, Subpart OOOO. Startup of the newly reconstructed units occurred on September 20, 2015 for Recip1 and on September 29, 2015 for Recip2. This change is not a modification under any provision of Title I of the Clean Air Act and did not result in an increase in emissions of any air pollutant. BP represented in their permit application that the compliance option for reciprocating compressors at this facility will be the rod packing replacement option and not an emission collection system. Therefore, the requirements for an emission collection system were not incorporated into the revised permit. Below is a summary of the newly regulated equipment.

Equipment ID	Description	Frame Number
Recip1	Ariel JGD-4 Reciprocating Compressor	F23233
Recip2	Ariel JGD-4 Reciprocating Compressor	F24283

As requested by BP on December 3, 2015, AQP has also made changes to synchronize the reporting dates for 40 CFR Part 60, Subpart OOOO and 40 CFR Part 63 Subpart A reports (required by 40 CFR Part 63, Subpart ZZZZ) with the Title V semi-annual monitoring reporting dates (April 1st and October 1st). Justification for these changes can be found below:

In accordance with §60.5420(b) of NSPS OOOO, “Annual reports may coincide with title V reports as long as all the required elements of the annual report are included. You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period.”

In accordance with §63.10(a)(5) of the General Provisions of 40 CFR Part 63, “If an owner or operator of an affected source in a State with delegated authority is required to submit periodic reports under this part to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such source under this part, the owner or operator may change the dates by which periodic reports under this part shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State.”

Specifically, the following revisions have been made to this permit:

Section II.A.2

- Added condition II.A.2. to streamline the periodic monitoring reporting dates of 40 CFR Part 63, Subpart A with the Title V semi-annual monitoring reporting dates.

Section II.L.1

- Updated the 40 CFR Part 63, Subpart ZZZZ reporting dates to align with the Tribe's Title V semi-annual monitoring reporting dates of April 1st and October 1st of each year.

Section III. Requirements for Reciprocating Compressors

- Added Section III. “Requirements for Reciprocating Compressors” to incorporate applicable requirements of 40 CFR Part 60, Subpart OOOO for reciprocating compressors Recip1 and Recip2.

AQP is making these revisions as a minor permit revision in accordance with RAC 2-111(3). The permit will be reissued as permit number V-SUIT-0050-2014.01.

For specific applicability information regarding the Title V permit for this facility, please reference the Statement of Basis for permit number V-SUIT-0050-2014.00.