

**Air Pollution Control  
 Title V Permit to Operate  
 Statement of Basis for Permit No. V-SUIT-0037-2014.02  
 Administrative and Minor Permit Revisions  
 April 25, 2016**



**Red Cedar Gathering Company  
 Homestead Compressor Station  
 Southern Ute Indian Reservation  
 La Plata County, Colorado**

**Description of Permit Revision**

This Statement of Basis describes two revisions to Red Cedar Gathering Company’s (Red Cedar) Homestead Compressor Station (Homestead) Title V operating permit which are being processed simultaneously by the Southern Ute Indian Tribe Air Quality Program (AQP).

The first is a revision requested by Red Cedar on January 11, 2016, as required by Settlement Agreement and Stipulated Final Compliance Order (Enforcement Case ID: 2015-0, December 22, 2015), to incorporate into the operating permit Red Cedar’s approved 40 CFR 63.774(c) Subpart HH plan for demonstrating compliance with the benzene emission limit specified in 40 CFR 63.765(b)(1)(ii). This revision is being made under the enhanced monitoring, recordkeeping, and reporting authorities of RAC 2-110(5) through (7) and as an administrative revision in accordance with RAC 2-111(2).

The second is a minor permit revision requested by Red Cedar on June 15, 2015 to replace a natural gas-fired, 4-stroke, rich-burn, 165 HP Cummins generator engine with a natural gas-fired, 4-stroke, rich-burn, Ford driven 57 HP Cummins generator set.

Homestead is a major source of hazardous air pollutants (HAP). The emission unit being added to the site is considered to be an “existing” unit under 40 CFR Part 63, Subpart ZZZZ, as it was manufactured prior to the June 12, 2006 trigger date for engines less than 500 HP located at a major source of HAP. Therefore, the unit is subject to the requirements for existing, non-emergency, non-black start, 4-stroke rich burn, stationary reciprocating internal combustion engines less than 100 HP located at a major source of HAP. Red Cedar’s minor revision request was postponed by the AQP while an enforcement action was pending at Homestead Compressor Station.

Information for the unit removed and the unit added can be seen in the table below:

Emission Unit ID	Description	Serial Number
G-101 (removed)	Cummins GTA8.3-G1 Generator Engine	46397106
G-102 (added)	Ford ESG-642 driven Cummins Genset	02-03-003318

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

Section I.A.

- Administrative changes were made to correct typographical errors.

#### Section II.B.

- Added Red Cedar's approved 40 CFR 63.774(c) Subpart HH compliance demonstration plan into condition II.B.6.c.
- Removed condition II.B.6.d. as it was not an applicable requirement for this facility.

#### Section II.C.

- Emission Unit ID G-101 has been changed to G-102. No other changes to the regulatory language are required, as the removed unit and the added unit are subject to the same regulatory requirements.

The permit will be reissued as permit number V-SUIT-0037-2014.02.

For specific applicability information regarding the Part 70 permit for this facility, please reference the Statement of Basis for permit number V-SUIT-0037-2014.00.