

**Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No. V-SUIT-0003-2014.01
Minor Permit Revision
May 31, 2016**



**BP America Production Company
Treating Site #4 Central Delivery Point
Southern Ute Indian Reservation
La Plata County, Colorado**

Description of Permit Revision

On March 29, 2016, the Southern Ute Indian Tribe Air Quality Program (AQP) received a minor permit revision application from BP America Production Company (BP) for the Treating Site #4 Central Delivery Point (TS4). BP requested a permit revision to replace a natural gas-fired, four-stroke, rich-burn, 95 nameplate-rated horsepower (HP) Caterpillar G3304NA Generator Engine with a natural gas-fired, four-stroke, rich-burn, 68-nameplate rated HP Arrow VRG330 Generator Engine. The replacement engine has the same regulatory requirements of 40 CFR 63, Subpart ZZZZ as the engine it replaced, but did not meet the criteria for an off-permit change under permit condition III.C., because it is a different make, model, and horsepower. Therefore, the change was required to be processed according to the minor permit revision requirements of RAC 2-111(3).

Information for the unit removed and the unit added are displayed in the table below:

Equipment ID	Description	Serial Number
TS4-15 (removed)	Caterpillar G3304NA	37Y02049
TS4-15 (added)	Arrow VRG330	P1818

TS4 is an area source of hazardous air pollutants (HAP). The emission unit added to the site is an “existing” unit under 40 CFR Part 63, Subpart ZZZZ, as it was manufactured prior to the June 12, 2006 trigger date for engines located at an area source of HAP. Therefore, the replacement engine is subject to the requirements already contained in the permit for existing, non-emergency, non-black start, four-stroke, rich-burn, stationary reciprocating internal combustion engines less than or equal to 500 brake HP located at an area source of HAP.

The application included updated potential to emit calculations reflecting the emission reductions associated with the engine replacement and greenhouse gas emissions which include carbon dioxide emissions for the dehydrators inadvertently omitted in the initial application.

Updated Potential to Emit
BP America Production Company, Treating Site #4 Central Delivery Point

Emission Unit ID	Unit Description	Regulated Air Pollutants in Tons Per Year ^{1,2,3,4} (Uncontrolled emissions displayed in parenthesis)								
		NO _x	VOC	SO ₂	PM ₁₀	CO	Lead	Total HAPs	Largest Single HAP (CH ₂ O)	GHGs (CO ₂ e tpy)
TS4-1	738 HP Waukesha F3521GSI Compressor Engine w/ NSCR & AFCR	7.1 (128.3)	7.1	0.0	0.5	14.3 (199.5)	0.0	0.4	0.4	2,974.2
TS4-2	738 HP Waukesha F3521GSI Compressor Engine w/ NSCR & AFCR	7.1 (128.3)	7.1	0.0	0.5	14.3 (199.5)	0.0	0.4	0.4	2,974.2
TS4-3	1215 HP Waukesha L5790GSI Compressor Engine w/ NSCR & AFCR	11.7 (211.2)	11.7	0.0	0.8	23.5 (328.5)	0.0	0.6	0.6	4,924.0
TS4-15	57 HP Arrow VRG330 Generator Engine	7.1	0.6	0.0	0.0	0.6	0.0	0.0	0.0	235.0
TS4-11b	Tri-ethylene Glycol Dehydrator Regenerator Vent and Flash Tank Vent, 12.8 MMscf/d	0.0	0.9	0.0	0.0	0.0	0.0	0.7	0.0	2,127.5
TS4-13b	Tri-ethylene Glycol Dehydrator Regenerator Vent and Flash Tank Vent, 12.8 MMscf/d	0.0	0.9	0.0	0.0	0.0	0.0	0.7	0.0	2,127.5
IEUs		1.5	0.5	0.0	0.1	1.3	0.0	0.1	0.0	14,609.5
TOTAL		34.5	28.8	0.0	1.9	54.0	0.0	2.9	1.4	29,971.9

¹Controlled NO_x, and CO emissions for units TS4-1, TS4-2, & TS4-3 are based on the BACT engine emission factors used to calculate the PSD permit #PSD-SU-0008-95.01 lb/hr and tpy emission limits. The uncontrolled emissions (shown in parenthesis) are based upon engine manufacturer emissions factors and are shown for 40 CFR Part 64, Compliance Assurance Monitoring applicability. ²Uncontrolled NO_x, CO, and VOC emissions for unit TS4-15 are based on manufacturer emissions factors.

³Uncontrolled dehydrator emissions based on GRI GLY-Calc modeled emissions.

⁴GHG emissions calculations for combustion sources based on 40 CFR 98 Subpart C, 98.33(a)(1)(i), Tier 1 Methodology, Equation C-1 and using source specific heat input.

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

Section I.B. Table 1 – Emission Units

- Updated information for emission unit TS4-15 to match with updated information for the replacement unit.

Section II.B.2.

- Updated information for emission unit TS4-15 to match with updated information for the replacement unit.

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-0003-2014.01.

For specific applicability information regarding the Title V permit for this facility, please reference the Statement of Basis for permit number V-SUIT-0003-2014.00.