

Southern Ute Indian Tribe

Air Quality Program



Title V Operating Permit

**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,

**SIMCOE, LLC
Treating Site #2 Compressor Station**

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
NE ¼ NW ¼, 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.

Danny J Powers

Daniel Powers, Air Quality Program Manager
Environmental Programs Division
Southern Ute Indian Tribe

**AIR POLLUTION CONTROL
TITLE V PERMIT TO OPERATE
SIMCOE, LLC
Treating Site #2 Compressor Station**

SUIT Account Identification Code: 2-002

Permit Number: V-SUIT-0002-2019.01

[Replaces Permit No.: V-SUIT-0002-2019.00]

Issue Date: December 30, 2020

Effective Date: December 30, 2020

Expiration Date: February 4, 2025

The SUIT account identification code and permit number cited above should be referenced in future correspondence regarding this facility.

Permit Issuance History

DATE	TYPE OF ACTION	DESCRIPTION OF ACTION	Permit Number
September 1999	Permit Issued	Initial Part 71 Permit Issued	V-SU-0002-00.00
September 2007	Permit Issued	1 st Part 71 Renewal Permit Issued	V-SU-0002-05.00
January 2008	Permit Revised	Administrative Amendment	V-SU-0002-05.01
January 2011	Permit Revised	Administrative Amendment <ul style="list-style-type: none">• Corrected serial number for TS2-13• Updated serial number and installation date for TS2-9• Modified permit language for clarification purposes	V-SU-0002-2005.02
February 21, 2014	Permit Issued	Initial Part 70 Permit Issued Replaces EPA-issued permit: V-SU-0002-2005.02	V-SUIT-0002-2014.00
February 4, 2020	Permit Issued	1 st Part 70 Renewal Permit Issued	V-SUIT-0002-2019.00
December 30, 2020	Permit Revised	Administrative Revision <ul style="list-style-type: none">• Change of ownership from BP America Production Company to SIMCOE, LLC.	V-SUIT-0002-2019.01

Table of Contents

Abbreviations and Acronyms	iii
Section I – Source Information and Emission Unit Identification	1
1. <i>Source Information.....</i>	<i>1</i>
2. <i>Source Emission Points.....</i>	<i>2</i>
Section II – General Requirements.....	3
1. <i>Title V Administrative Requirements.....</i>	<i>3</i>
1.1. Annual Fee Payment [RAC 2-110(1)(h) and RAC 2-118].....	3
1.2. Compliance Requirements.....	5
1.3. Duty to Provide and Supplement Information [RAC 2-110(7)(e), 2-106(5), and 2-124]	7
1.4. Submissions [RAC 2-105].....	8
1.5. Severability Clause [RAC 1-106 and RAC 2-110(1)(f)]	8
1.6. Permit Actions [RAC 2-110(3)]	8
1.7. Administrative Permit Revision [RAC 2-111(2)].....	9
1.8. Minor Permit Revisions [RAC 2-111(3)]	9
1.9. Significant Permit Revisions [RAC 2-111(4)]	10
1.10. Permit Reopenings, Revocations and Reissuances, and Terminations [RAC 2-112]	11
1.11. Property Rights [RAC 2-110(3)(e)]	12
1.12. Inspection and Entry [RAC 2-110(9)(b)]	12
1.13. Emergency Situations [RAC 2-117].....	12
1.14. Permit Transfers [RAC 2-113]	13
1.15. Off-Permit Changes [RAC 2-116(2)]	13
1.16. Permit Expiration and Renewal	14
2. <i>Facility-Wide Requirements.....</i>	<i>15</i>
2.1. General Recordkeeping Requirements [RAC 2-110(6)]	15
2.2. General Reporting Requirements	16
2.3. Alternative Operating Scenarios [RAC 2-110(8)]	18
2.4. Permit Shield [RAC 2-110(10)(c)].....	20
2.5. Stratospheric Ozone and Climate Protection [40 CFR Part 82]	20
Section III – Site Specific Permit Terms	20
1. <i>Reserved - New Source Performance Standards (NSPS) and 40 CFR Part 60</i>	<i>21</i>
2. <i>National Emission Standards for Hazardous Air Pollutants (NESHAP) and 40 CFR Part 63.....</i>	<i>21</i>
2.1. 40 CFR Part 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities [40 CFR 63.760 – 63.774 and RAC 4-103]	21
2.2. Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities [40 CFR §63.6580 – 63.6660 and RAC §4-103]	21
3. <i>Reserved – Tribal Minor New Source Review</i>	<i>31</i>
4. <i>Prevention of Significant Deterioration Requirements.....</i>	<i>31</i>
4.1. 40 CFR Part 52.21 PSD Engine Requirements [PSD Permit # PSD-SU-0007-95.01 and RAC 2-110(6) and RAC 2-110(7)]	31
5. <i>Reserved – Consent Decree Requirements</i>	<i>39</i>

6.	<i>Compliance Assurance Monitoring (CAM) Requirements</i>	39
6.1.	40 CFR Part 64 Compliance Assurance Monitoring [40 CFR 64.1 – 40 CFR 64.10]	39
7.	<i>Enhanced Monitoring, Recordkeeping, and Reporting</i>	41
Section IV – Appendix		43
1.	<i>Inspection Information</i>	43
1.1.	Driving Directions:	43
1.2.	Global Positioning System (GPS):	43
1.3.	Safety Considerations:	43
2.	<i>BP America Production Company, Treating Site #2 Compressor Station, Compliance Assurance Monitoring (CAM) Plan</i>	43

Abbreviations and Acronyms

4SLB	Four-Stroke Lean-Burn
4SRB	Four-Stroke Rich-Burn
AFS	Air Facility System database
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
gal	Gallon
GPM	Gallons per minute
H ₂ S	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
MMSCFD	Million standard cubic feet per day
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
scf	Standard cubic feet
scfm	Standard cubic feet per minute
SI	Spark Ignition
SO ₂	Sulfur Dioxide
SUIT	Southern Ute Indian Tribe
tpy	Ton(s) Per Year

Tribe
US EPA
VOC

Southern Ute Indian Tribe
United States Environmental Protection Agency
Volatile Organic Compounds

Table of Figures

Table 1 – Emission Units.....	2
Table 2 - Insignificant Emission Units	3

Section I – Source Information and Emission Unit Identification

1. Source Information

Owner Name:	SIMCOE, LLC
Facility Name:	Treating Site #2 Compressor Station
Facility Location:	NE ¼ NW ¼, Section 20, R32N R8W
Latitude:	37.008517° N
Longitude:	-107.744849° W
State:	Colorado
County:	La Plata
Responsible Official:	Area Manager, Midstream
SIC Code:	1311
ICIS Identification Number:	110007077199
EPA Facility Registry ID:	08067U0009
Other Clean Air Act Permits	PSD-SU-0007-95.00

Process Description:

Treating Site #2 Compressor Station 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 one glycol dehydrator unit 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, while some of the gas is used by SIMCOE, LLC as fuel gas. The gas contains only a negligible amount of hydrogen sulfide (H₂S). Therefore, no H₂S removal is necessary.

2. Source Emission Points

Table 1 – Emission Units

Emission Unit ID	Description				Control Equipment
	Waukesha L5790GSI 4SRB SI Compressor Engine 1,215 Nameplate Rated HP				NSCR Catalyst and AFRC
TS2-1	Serial No.	401229	Install Date:	8/23/2017	
TS2-2	Serial No.	401236	Install Date:	1/28/2015	
	Waukesha L7042GL 4SLB SI Compressor Engine 1,478 Nameplate Rated HP				None
TS2-9	Serial No.	C-11346/3	Install Date:	5/21/2010	
	Caterpillar G3304NA 4SRB SI Generator Engine 95 Nameplate Rated HP				None
TS2-13	Serial No.	N4F01129	Install Date:	9/2005	
	Tri-Ethylene Glycol (TEG) Dehydrator Regenerator Vent and Flash Tank Vent #1 20 MMscf/d				None
TS2-8b, TS2-8c	Serial No.	N/A	Install Date:	N/A	
	Tri-Ethylene Glycol Still Column Vent #2 20 MMscf/d				None
TS2-10b ¹	Serial No.	N/A	Install Date:	N/A	
	Waukesha VRG 330 Generator Engine 68 Nameplate Rated HP				N/A
TS2-3 ²	Serial No.	N/A	Install Date:	Removed	

¹ TS2-10b has been disconnected from the process since 2015. This unit remains on site.

² 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

Emission Unit ID	Amount	Description	Size	Units
TS2-4, TS2-5	2	Tank Heaters	500	Mbtu/hr
TS2-6 ¹	1	Glycol Reboiler	512	MBtu/hr
TS2-7	N/A	Fugitive Sources	N/A	N/A
TS2-8	1	Glycol Reboiler #1	350	MBtu/hr
TS2-11	1	Tank Heater	375	Mbtu/hr
N/A	10	Catalytic Space Heaters	48	MBtu/hr
N/A	2	Catalytic Space Heaters	12	MBtu/hr
N/A	1	Catalytic Space Heater	18	MBtu/hr
N/A	4	Lube Oil Tanks	500	gal
N/A	1	Lube Oil Tank	300	gal
N/A	1	Used Oil Tank	35	bbl
N/A	3	Used oil Sumps	≤ 90	bbl
N/A	1	Tri-Ethylene Glycol (TEG) / Produced Water Dehy Sump	35	bbl
N/A	1	Ethylene Glycol (EG) Tank	500	gal
N/A	2	Produced Water Tanks	500	bbl
N/A	1	Produced Water Pit Tank	N/A	N/A
N/A	1	Oily Water Tank	300	bbl
N/A	2	Tri-Ethylene Glycol (TEG) Tank	500	gal

¹ 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

Section II – General Requirements

1. Title V Administrative Requirements

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

1.1.1. An annual operating permit emission fee shall be paid to the Tribe by the permittee.
[RAC 2-118(2)]

1.1.2. The permittee shall pay the annual permit fee each year no later than April 1st for the preceding calendar year.
[RAC 2-118(2)]

1.1.3. 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 by the United States Postal Service c/o

Environmental Programs Division Part 70 Program, P.O. Box 737 MS #84, Ignacio, Colorado 81137; or by common carrier (such as UPS or FedEx) c/o Environmental Programs Division Part 70 Program, 398 Ouray Drive, Ignacio, Colorado 81137.

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

- 1.1.4. 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]

- 1.1.5. Basis for calculating annual fee:

- 1.1.5.1. 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 for each fee pollutant. 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)]

- 1.1.5.1.1. "Actual emissions" means the actual rate of emissions in tpy of any fee pollutant (for fee calculation) emitted from a Title V source over the preceding calendar year or any other period determined by the Tribe to be more representative of normal operation and consistent with the fee schedule adopted by the Tribe and approved by the Administrator. Actual emissions shall be calculated using each emissions units actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year or other period used for this calculation.

[RAC 1-103(2)]

- 1.1.5.1.2. Actual emissions shall be computed using compliance methods required by the permit.

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

- 1.1.5.1.3. 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)]

- 1.1.5.2. 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.]

- 1.1.5.3. The permittee shall exclude the following emissions from the calculation of fees:

- 1.1.5.3.1. The amount of actual emissions of any one fee pollutant that the source emits in excess of 4,000 tons per year

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

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

- 1.1.6. 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)]

- 1.1.7. 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)]

- 1.1.8. 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)]

- 1.1.9. 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)]

1.2. Compliance Requirements

1.2.1. Compliance with the Permit

- 1.2.1.1. 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)]

- 1.2.1.2. 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)]

- 1.2.1.3. 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)]

- 1.2.1.4. 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)]

- 1.2.1.5. 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]

1.2.2. Compliance Certifications

- 1.2.2.1. 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, except that the first annual certification of compliance will cover the period from the issuance date of this permit through December 31st of the same year.

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

1.2.3. Compliance Schedule

- 1.2.3.1. 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)]

- 1.2.3.2. 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)]

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

- 1.3.1. The permittee shall furnish to the Tribe, within the period specified by the Tribe, any information that the Tribe request 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.

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

- 1.3.2. 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)]

1.4. Submissions [RAC 2-105]

- 1.4.1. 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>).]

- 1.4.2. 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 email at: airquality@southernute-nsn.gov

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

or by Common Carrier:
Part 70 Program
Environmental Programs Division
Air Quality Program
398 Ouray Drive
Ignacio, CO 81137

1.5. 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.

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

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

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

- 1.6.2. 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)]

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

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

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

- 1.7.2. 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.]

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

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

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

- 1.8.2.1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- 1.8.2.2. If changes are requested to the permit language, the permittee's suggested draft permit changes;
- 1.8.2.3. 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

- 1.8.2.4. Completed forms for the Tribe to use to notify the Administrator and affected programs as required under RAC § 2-108
- 1.8.2.5. 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)]
- 1.8.3. 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)]
- 1.8.4. 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)]
- 1.8.5. The permit shield under RAC § 2-110(10) does not extend to minor permit revisions.
[RAC 2-110(10)(d)]

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

- 1.9.1. The permittee must request the use of significant permit revision procedures as defined in RAC § 1-103.
- 1.9.2. 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)]

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

1.10.1. The permit may be reopened and revised for any of the reasons listed in the paragraphs below. Alternatively, the permit may be revoked and reissued for the reasons listed in the paragraphs below:

- 1.10.1.1. 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);
- 1.10.1.2. 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;
- 1.10.1.3. 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
- 1.10.1.4. The Tribe or the Administrator determines that the permit must be revised or revoked and reissued to assure compliance with applicable requirements.

1.10.2. The permit may be terminated for any of the reasons listed below:

- 1.10.2.1. The permittee fails to meet the requirements of an approved compliance plan;
- 1.10.2.2. The permittee has been in significant or repetitious noncompliance with the operating permit terms or conditions;
- 1.10.2.3. The permittee has exhibited a history of willful disregard for environmental laws of any tribal or state authority, or of the United States;

- 1.10.2.4. 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;
- 1.10.2.5. The permittee falsifies, tampers with, or renders inaccurate any monitoring device or method required to be maintained under the permit;
- 1.10.2.6. The permittee fails to pay fees required under RAC §§ 2-118 and 2-119; or
- 1.10.2.7. The Administrator has found that cause exists to terminate the permit.

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

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

1.12. 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:

- 1.12.1. 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;
- 1.12.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 1.12.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 1.12.4. 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.

1.13. Emergency Situations [RAC 2-117]

- 1.13.1. 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:

- 1.13.1.1. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- 1.13.1.2. The permitted facility was at the time being properly operated;
- 1.13.1.3. 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
- 1.13.1.4. The permittee reported the emergency to the Tribe in compliance with RAC § 2-110(7).

[RAC 2-117(1)]

- 1.13.2. In any enforcement proceeding the permittee attempting to establish the occurrence of an emergency has the burden of proof.

[RAC 2-117(2)]

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

[RAC 2-117(3)]

1.14. Permit Transfers [RAC 2-113]

- 1.14.1. 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.

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

- 1.15.1. 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:

- 1.15.1.1. Each such change meets all applicable requirements and shall not violate any existing permit term or condition;
- 1.15.1.2. 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;
- 1.15.1.3. Such changes are not subject to permit revision procedures under RAC § 2-111; and
- 1.15.1.4. 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)]

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

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

- 1.15.3. 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)]

- 1.15.4. A copy of each off-permit change notification shall be made available to the Tribe upon request.

[RAC 2-110(6)]

1.16. 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)]

- 1.16.1. This permit shall expire five years from the issuance date of this permit.

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

- 1.16.2. 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)]

1.16.3. 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)]

1.16.4. The ability to operate under this permit shall cease if (1) the Tribe takes final action to 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)]

1.16.5. 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)]

1.16.6. 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)]

2. 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)]

2.1. General Recordkeeping Requirements [RAC 2-110(6)]

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

2.1.1. 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, for a period of five years after the determination, or until the source

changes its operations to become an affected source, whichever comes first. Each of these records shall be made available to the Tribe upon request. 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)]

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

2.2. General Reporting Requirements

- 2.2.1. 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. 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)]

- 2.2.2. “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:

- 2.2.2.1. A situation where emissions exceed an emission limitation or standard;
- 2.2.2.2. A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or
- 2.2.2.3. 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.

- 2.2.2.4. A situation in which an exceedance or an excursion, as defined in 40 CFR Part 64 occurs.

[RAC 1-103(21)]

- 2.2.3. 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 deviation reports shall be submitted to the following email address: airquality@southernute-nsn.gov

- 2.2.4. “Prompt” is defined as follows:

- 2.2.4.1. 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.

- 2.2.4.2. 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:

- 2.2.4.2.1. 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;

- 2.2.4.2.2. 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;

- 2.2.4.2.3. 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)]

2.3. Alternative Operating Scenarios [RAC 2-110(8)]

2.3.1. Replacement of an existing engine or turbine 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:

- 2.3.1.1. The engine or turbine 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;
- 2.3.1.2. The replacement engine or turbine is of the same make, model, horsepower rating, and configured to operate in the same manner as the engine or turbine being replaced.
- 2.3.1.3. The replacement engine or turbine meets all applicable requirements identified in this permit that apply to the existing engine or turbine being replaced.
- 2.3.1.4. All applicable requirements that apply to the replacement engine or turbine are already included in the permit. Replacement of an existing engine or turbine 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:
 - 2.3.1.4.1. Standards of Performance for Stationary Compression Ignition Internal Combustion at 40 CFR Part 60, Subpart IIII;
 - 2.3.1.4.2. Standards of Performance for Stationary Spark Ignition Internal Combustion Engines at 40 CFR Part 60, Subpart JJJJ;
 - 2.3.1.4.3. National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines at 40 CFR Part 63, Subpart ZZZZ;
 - 2.3.1.4.4. Standards of Performance for Stationary Gas Turbines at 40 CFR Part 60, Subpart GG;

- 2.3.1.4.5. Standards of Performance for Stationary Combustion Turbines at 40 CFR Part 60, Subpart KKKK;
 - 2.3.1.4.6. National Emission Standard for Hazardous Air Pollutants for Stationary Combustion Turbines at 40 CFR Part 63, Subpart YYYY;
 - 2.3.1.4.7. 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;
 - 2.3.1.4.8. 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
 - 2.3.1.4.9. Requirements established in any promulgated Federal Implementation Plan that may apply to engines located on the Southern Ute Indian Reservation.
- 2.3.2. The permittee shall provide contemporaneous written notice to the Tribe and the Administrator of any replacement of an existing engine or turbine identified in this permit. Such notice shall state when the replacement occurred and shall describe the replacement and any applicable requirement that would apply as a result of the replacement.
- 2.3.3. The permittee shall keep a record of the engine or turbine replacement.
- 2.3.4. The use of a backup thermal oxidizer with equivalent capacity and emission destruction efficiency and configured to operate in the same manner as the primary thermal oxidizer shall be an allowed alternative operating scenario under this permit provided that the following conditions are met:
- 2.3.4.1. Any emission limits, requirements, testing or other provisions that apply to the primary thermal oxidizer shall also apply to the backup thermal oxidizer except that an annual performance test shall only be conducted on the backup thermal oxidizer if the unit operates for more than 500 hours in any calendar year.
 - 2.3.4.2. At no time shall the backup thermal oxidizer operate at the same time the primary thermal oxidizer is operating except periods of transition between

the primary and backup thermal oxidizers. Transition events shall be documented, last no more than 30 minutes in duration, and will be reported as excess emission events.

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

Nothing in this permit shall alter or affect the following:

- 2.4.1. 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;
- 2.4.2. The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- 2.4.3. The applicable requirements of the acid rain program consistent with section 408(a) of the Act; or
- 2.4.4. 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.

2.5. Stratospheric Ozone and Climate Protection [40 CFR Part 82]

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F:

- 2.5.1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR §82.156.
- 2.5.2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR §82.158.
- 2.5.3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.

Section III – Site Specific Permit Terms

1. Reserved - New Source Performance Standards (NSPS) and 40 CFR Part 60

2. National Emission Standards for Hazardous Air Pollutants (NESHAP) and 40 CFR Part 63

2.1. 40 CFR Part 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities [40 CFR 63.760 – 63.774 and RAC 4-103]

The permittee is the owner or operator of a glycol dehydration unit that is exempt from the standards of 40 CFR §63.764(d). The permittee shall retain each determination used to demonstrate that the actual average benzene emissions from each dehydrator are below 0.90 megagram per year.

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

- 2.1.1. The permittee must obtain an extended wet gas analysis of the inlet gas stream at least once per calendar year. The gas sample shall be taken at a point prior to where the gas enters the dehydration system contact tower. The analysis shall include the gas temperature and pressure at which the sample was taken. This analysis must be used to determine the actual average benzene emissions annually, as determined in accordance with §63.772(b)(2)(i).

[RAC 2-110(5)(b)]

2.2. Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities [40 CFR §63.6580 – 63.6660 and RAC §4-103]

This facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ for existing remote 4SRB with a site rating greater than 500 brake horsepower, existing 4SLB with a site rating greater than 500 HP, and existing 4SRB with a site rating less than or equal to 500 HP located at an area source. Notwithstanding the terms and conditions of this permit, you shall comply with all applicable requirements of 40 CFR Part 63 Subparts A and ZZZZ as they apply to each affected source as defined at §63.6585.

2.2.1. Affected Sources

- 2.2.1.1. 40 CFR Part 63, Subpart ZZZZ applies to the following emission units:

TS2-1 - Waukesha L5790GSI 4SRB SI Compressor Engine, 1,215 Site Rated HP

TS2-2 - Waukesha L5790GSI 4SRB SI Compressor Engine, 1,215 Site Rated HP

TS2-9 - Waukesha L7042GL 4SLB SI Compressor Engine, 1,321 Site Rated HP

TS2-13 - Caterpillar G3304NA 4SRB SI Generator Engine, 81 Site Rated HP

2.2.2. Emission and Operating Limitations

- 2.2.2.1. If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart that apply to you

Table 2d to Subpart ZZZZ of Part 63—Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions	
As stated in §§63.6603 and 63.6640, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:	
For Each...	You must meet the following emission limitation, except during periods of startup...
8. Non-emergency, non-black start 4SLB remote stationary RICE >500 HP	a. Change oil and filter every 2,160 hours of operation or annually, whichever comes first; ¹
	b. Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
	c. Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.
10. Non-emergency, non-black start 4SRB stationary RICE ≤500 HP	a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; ¹
	b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and
	c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.
11. Non-emergency, non-black start 4SRB remote stationary RICE >500 HP	a. Change oil and filter every 2,160 hours of operation or annually, whichever comes first ¹ ;
	b. Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
	c. Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

¹Sources have the option to utilize an oil analysis program as described in §63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart.

2.2.2.2. An existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP must meet the definition of remote stationary RICE in §63.6675 on the initial compliance date for the engine, October 19, 2013, in order to be considered a remote stationary RICE under this subpart. Owners and operators of existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP that meet the definition of remote stationary RICE in §63.6675 of this subpart as of October 19, 2013 must evaluate the status of their stationary RICE every 12 months. Owners and operators must keep records of the initial and annual evaluation of the status of the engine. If the evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in §63.6675 of this subpart, the owner or operator must comply with all of the requirements for existing non-emergency SI 4SLB and 4SRB stationary RICE with a site rating of more than 500 HP located at area sources of HAP that are not remote stationary RICE within 1 year of the evaluation.

2.2.2.2.1. In accordance with §63.6675, for stationary RICE located on a pipeline segment, *Remote Stationary RICE* must meet the criteria listed below:

2.2.2.2.1.1. A pipeline segment with 10 or fewer buildings intended for human occupancy and no buildings with four or more stories within 220 yards (200 meters) on either side of the centerline of any continuous 1-mile (1.6 kilometers) length of pipeline. Each separate dwelling unit in a multiple dwelling unit building is counted as a separate building intended for human occupancy.

2.2.2.2.1.2. The pipeline segment does not lie within 100 yards (91 meters) of either a building or a small, well-defined outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period. The days and weeks need not be consecutive. The building or area is considered occupied for a full day if it is occupied for any portion of the day.

2.2.2.2.1.3. For purposes of this section, the term pipeline segment means all parts of those physical facilities through which gas

moves in transportation, including but not limited to pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies. Stationary RICE located within 50 yards (46 meters) of the pipeline segment providing power for equipment on a pipeline segment are part of the pipeline segment. Transportation of gas means the gathering, transmission, or distribution of gas by pipeline, or the storage of gas. A building is intended for human occupancy if its primary use is for a purpose involving the presence of humans.

[40 CFR 63.6603 and 63.6675]

2.2.3. General Compliance Requirements

- 2.2.3.1. You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply at all times.
- 2.2.3.2. At all times you 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. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Tribe 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]

2.2.4. Testing and Initial Compliance Requirements

- 2.2.4.1. For emission unit TS2-13, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions

- 2.2.4.2. For all engines, you must minimize the time spent at idle during startup and minimize the startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- 2.2.4.3. For emission units TS2-1 and TS2-2, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to this subpart. 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 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]

2.2.5. Continuous Compliance Requirements

- 2.2.5.1. You must demonstrate continuous compliance with each requirement in Table 2d to this subpart that applies to you according to methods specified in Table 6 to this subpart.

Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance With Emission Limitations, and Other Requirements		
As stated in §63.6640, you must continuously comply with the emissions and operating limitations and work or management practices as required by the following:		
For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .

9. Existing non-emergency 4SLB and 4SRB stationary RICE \leq 500 HP located at an area source of HAP, and existing non-emergency 4SLB and 4SRB stationary RICE $>$ 500 HP located at an area source of HAP that are remote stationary RICE	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
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2.2.5.2. You must report each instance in which you did not meet each requirement in Table 2d to this subpart that applies. These instances are deviations from the operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650.

2.2.5.3. You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply.

[40 CFR 63.6640]

2.2.6. Notifications, Reports, and Records

2.2.6.1. You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies.

2.2.6.2. You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.

2.2.6.2.1. In order to demonstrate compliance with the maintenance requirements, maintenance records will record the information including, but not limited to, the following:

2.2.6.2.1.1. Date the maintenance activity occurred

2.2.6.2.1.2. Hours of engine operation

2.2.6.2.1.3. Engine serial number

- 2.2.6.2.1.4. If an engine oil sample was pulled (if the engine oil analysis program is allowed under §63.6625(j))
- 2.2.6.2.1.5. If the engine oil was replaced
- 2.2.6.2.1.6. If the engine oil filter was replaced
- 2.2.6.2.1.7. If the belts were inspected or replaced
- 2.2.6.2.1.8. If the hoses were inspected or replaced
- 2.2.6.2.1.9. If the sparkplugs were inspected or replaced
[40 CFR 63.6655 and RAC 2-110(6)]
- 2.2.6.3. Records must be kept in a form suitable and readily available for expeditious review according to §63.10(b)(1).
- 2.2.6.4. As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- 2.2.6.5. You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).
[40 CFR 63.6660]

2.2.7. Other Requirements and Information

- 2.2.7.1. Table 8 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

Table 8 to Subpart ZZZZ of Part 63 – Applicability of General Provisions to Subpart ZZZZ			
General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.1	General applicability of the General Provisions	Yes.	
§63.2	Definitions	Yes	Additional terms defined in §63.6675.
§63.3	Units and abbreviations	Yes.	
§63.4	Prohibited activities and circumvention	Yes.	

§63.5	Construction and reconstruction	Yes.	
§63.6(a)	Applicability	Yes.	
§63.6(b)(1)-(4)	Compliance dates for new and reconstructed sources	Yes.	
§63.6(b)(5)	Notification	Yes.	
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes.	
§63.6(c)(1)-(2)	Compliance dates for existing sources	Yes.	
§63.6(c)(3)-(4)	[Reserved]		
§63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes.	
§63.6(d)	[Reserved]		
§63.6(e)	Operation and maintenance	No.	
§63.6(f)(1)	Applicability of standards	No.	
§63.6(f)(2)	Methods for determining compliance	Yes.	
§63.6(f)(3)	Finding of compliance	Yes.	
§63.6(g)(1)-(3)	Use of alternate standard	Yes.	
§63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
§63.6(i)	Compliance extension procedures and criteria	Yes.	
§63.6(j)	Presidential compliance exemption	Yes.	
§63.7(a)(1)-(2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at §§63.6610, 63.6611, and 63.6612.
§63.7(a)(3)	CAA section 114 authority	Yes.	
§63.7(b)(1)	Notification of performance test	Yes	Except that §63.7(b)(1) only applies as specified in §63.6645.
§63.7(b)(2)	Notification of rescheduling	Yes	Except that §63.7(b)(2) only applies as specified in §63.6645.
§63.7(c)	Quality assurance/test plan	Yes	Except that §63.7(c) only applies as specified in §63.6645.
§63.7(d)	Testing facilities	Yes.	

§63.7(e)(1)	Conditions for conducting performance tests	No.	Subpart ZZZZ specifies conditions for conducting performance tests at §63.6620.
§63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at §63.6620.
§63.7(e)(3)	Test run duration	Yes.	
§63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes.	
§63.7(f)	Alternative test method provisions	Yes.	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes.	
§63.7(h)	Waiver of tests	Yes.	
§63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at §63.6625.
§63.8(a)(2)	Performance specifications	Yes.	
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring for control devices	No.	
§63.8(b)(1)	Monitoring	Yes.	
§63.8(b)(2)-(3)	Multiple effluents and multiple monitoring systems	Yes.	
§63.8(c)(1)	Monitoring system operation and maintenance	Yes.	
§63.8(c)(1)(i)	Routine and predictable SSM	No	
§63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes.	
§63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	No	
§63.8(c)(2)-(3)	Monitoring system installation	Yes.	
§63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
§63.8(c)(6)-(8)	CMS requirements	Yes	Except that subpart ZZZZ does not require COMS.
§63.8(d)	CMS quality control	Yes.	
§63.8(e)	CMS performance evaluation	Yes	Except for §63.8(e)(5)(ii), which applies to COMS.

		Except that §63.8(e) only applies as specified in §63.6645.	
§63.8(f)(1)-(5)	Alternative monitoring method	Yes	Except that §63.8(f)(4) only applies as specified in §63.6645.
§63.8(f)(6)	Alternative to relative accuracy test	Yes	Except that §63.8(f)(6) only applies as specified in §63.6645.
§63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§63.6635 and 63.6640.
§63.9(a)	Applicability and State delegation of notification requirements	Yes.	
§63.9(b)(1)-(5)	Initial notifications	Yes	Except that §63.9(b)(3) is reserved.
		Except that §63.9(b) only applies as specified in §63.6645.	
§63.9(c)	Request for compliance extension	Yes	Except that §63.9(c) only applies as specified in §63.6645.
§63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that §63.9(d) only applies as specified in §63.6645.
§63.9(e)	Notification of performance test	Yes	Except that §63.9(e) only applies as specified in §63.6645.
§63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(1)	Notification of performance evaluation	Yes	Except that §63.9(g) only applies as specified in §63.6645.
§63.9(g)(2)	Notification of use of COMS data	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	Yes	If alternative is in use.
		Except that §63.9(g) only applies as specified in §63.6645.	

[40 CFR 63.6665]

3. Reserved – Tribal Minor New Source Review

4. Prevention of Significant Deterioration Requirements

4.1. 40 CFR Part 52.21 PSD Engine Requirements [PSD Permit # PSD-SU-0007-95.01 and RAC 2-110(6) and RAC 2-110(7)]

Notwithstanding the conditions in this permit, the permittee shall comply with all conditions of the PSD Permit #PSD-SU-0007-95.01.

4.1.1. PSD Permit #PSD-SU-007-95.01 applies to the following emission units:

TS2-1 - Waukesha L5790GSI 4SRB SI Natural Gas-Fired Compressor Engine, 1,215 Nameplate Rated HP

TS2-2 - Waukesha L5790GSI 4SRB SI Natural Gas-Fired Compressor Engine, 1,215 Nameplate Rated HP

TS2-3¹ - Waukesha VRG330 Natural Gas-Fired Generator Engine, 68 Nameplate Rated HP

TS2-4 – Tank Heater #1, 500 MBtu/hr

TS2-5 – Tank Heater #2, 500 MBtu/hr

TS2-6¹ – Reboiler #1, 512 MBtu/hr

TS2-7 - Fugitives

¹TS2-3 and TS2-6 have been shut down and permanently removed from the facility. However, these units remain in the Part 70 permit as they are still listed in the PSD permit for this facility.

4.1.2. Emission Limitations

4.1.2.1. The Applicant shall limit emissions from the source to those in the table below.

PSD Emission Limits

Unit ID	NO _x			CO			VOC		
	Emission Factor	(lbs/hr)	(tpy)	Emission Factor	(lbs/hr)	(tpy)	Emission Factor	(lbs/hr)	(tpy)

TS2-1	1.0 g/hp-hr	2.7	11.7	2.0 g/hp-hr	5.4	23.5	0.002 g/hp-hr	<0.01	0.02
TS2-2	1.0 g/hp-hr	2.7	11.7	2.0 g/hp-hr	5.4	23.5	0.002 g/hp-hr	<0.01	0.02
TS2-3 ¹	7.5 g/hp-hr	1.1	4.0	45.0 g/hp-hr	6.7	29.5	0.005 g/hp-hr	<0.01	<0.01
TS2-4	95.0 lb/MMscf	0.05	0.22	19.95 lb/MMscf	0.01	0.05	0.014 lb/MMscf	<0.01	<0.01
TS2-5	95.0 lb/MMscf	0.05	0.22	19.95 lb/MMscf	0.01	0.05	0.014 lb/MMscf	<0.01	<0.01
TS2-6 ¹	95.0 lb/MMscf	0.05	0.22	19.95 lb/MMscf	0.01	0.05	0.014 lb/MMscf	<0.01	<0.01
TS2-7								0.04	0.16
Totals		6.65	28.96		17.53	76.65		0.04	0.2

¹TS2-3 and TS2-6 have been shut down and permanently removed from the facility. However, these units remain in the Part 70 permit as they are still listed in the PSD permit for this facility.

PSD Emission Limits (Continued)

Unit ID	SO ₂			PM ₁₀		
	Emission Factor	(lbs/hr)	(tpy)	Emission Factor	(lbs/hr)	(tpy)
TS2-1	0.002 g/hp-hr	<0.01	0.02	0.01 g/hp-hr	0.03	0.12
TS2-2	0.002 g/hp-hr	<0.01	0.02	0.01 g/hp-hr	0.03	0.12
TS2-3	0.002 g/hp-hr	<0.01	<0.01	0.01 g/hp-hr	<0.01	0.01
TS2-4	0.57 lb/MMscf	<0.01	<0.01	11.4 lb/MMscf	0.01	0.03
TS2-5	0.57 lb/MMscf	<0.01	<0.01	11.4 lb/MMscf	0.01	0.03
TS2-6	0.57 lb/MMscf	<0.01	<0.01	11.4 lb/MMscf	0.01	0.03
TS2-7						
Totals		<0.01	0.04		0.09	0.34

¹TS2-3 and TS2-6 have been shut down and permanently removed from the facility. However, these units remain in the Part 70 permit as they are still listed in the PSD permit for this facility.

4.1.3. Maintenance and Operation Requirements

- 4.1.3.1. At all times, including periods of startup (except for replacement / overhauled engines), shut-down, and equipment malfunction, the Source, 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 the Administrator, 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 Source.

4.1.4. Testing Requirements

- 4.1.4.1. Initial compliance with emission limits in Condition 5 (PSD Emission Limits) above for each engine type (except for the Waukesha VRG 330 model for which testing is not required) shall be determined by emission tests to be performed within 90 calendar days of EPA's approval of an engine Testing Protocol, unless a longer timeframe is agreed upon by the Applicant and EPA.
- 4.1.4.2. 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 NO_x emissions and EPA Reference Method 10 shall be used to measure CO emissions, unless alternative methods are approved by the Administrator.
- 4.1.4.3. The Applicant shall provide EPA with an engine Testing Protocol within 90 (ninety) calendar days of the effective date of this permit. The Testing Protocol shall be approved by EPA prior to commencement of engine testing by the Applicant. The Testing Protocol must document which compressor engine parameters are to be monitored in order to calculate the engine horsepower.
- 4.1.4.4. The Applicant shall provide EPA and the Tribe with at least 30 (thirty) calendar days prior notice (in writing) of each emissions test, in order to give EPA and the Tribe the opportunity to observe the test; unless a shorter timeframe is agreed upon by the Applicant and EPA.

4.1.5. Monitoring Requirements

- 4.1.5.1. The Applicant shall measure NO_x and CO emissions from the catalytically-controlled (Units TS2-1 and TS2-2) compressor engines at least once every calendar quarter beginning the first calendar quarter after the Applicant's submittal of initial compliance

test results to EPA. Upon demonstration of compliance with the PSD Emission Limits for six (6) consecutive calendar quarters, the Applicant may conduct the NO_x and CO monitoring for these engines on a semi-annual basis.

4.1.5.2. To meet the monitoring requirements above, the Applicant shall measure the NO_x and CO emissions from each engine using a portable analyzer and monitoring protocol approved by EPA. The Applicant shall submit the analyzer specifications and monitoring protocol to EPA for approval within 120 (one-hundred twenty) calendar days of the effective date of this permit.

4.1.5.3. The Applicant shall not conduct NO_x and CO emissions monitoring on Units TS2-1 and TS2-2 that have not been operated during the specified monitoring period. The Applicant 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 Section III.4.1.6. of this permit.

4.1.6. Recordkeeping Requirements

4.1.6.1. The Applicant shall keep a record of all initial compliance tests and emissions monitoring required by this permit. The record shall include:

4.1.6.1.1. The date, place, and time of sampling or monitoring;

4.1.6.1.2. The date(s) the analyses were performed;

4.1.6.1.3. The company or entity that performed the analyses;

4.1.6.1.4. The analytical techniques or methods used;

4.1.6.1.5. The results of such analyses; and

4.1.6.1.6. The operating conditions that existed at the time of sampling or monitoring.

4.1.6.2. The Applicant 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 upon request for inspection by the Tribe and EPA and must be submitted to the Tribe and EPA.

4.1.7. Reporting Requirements

- 4.1.7.1. The Applicant shall submit a written report containing the initial compliance test results for each engine tested. This report shall be submitted to EPA within 30 (thirty) calendar days of the date the emissions tests are complete.
- 4.1.7.2. The Applicant shall submit a written report containing the emissions monitoring results for Units TS2-1 and TS2-2. This report shall be submitted semi-annually to EPA and the Tribe by April 1 and October 1 of each year. The reporting period for the April 1 report is July 1 – 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 the Submissions section of this permit.
- 4.1.7.3. Except for replacement / overhauled engines which are addressed under Condition 14(b), the Applicant shall notify EPA and the Tribe not more than 48 (forty-eight) hours after the discovery of excess emissions during periods of startup, shut-down, equipment malfunction, or upset conditions. 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. Not more than 15 (fifteen) days after discovery, all of the following shall be provided to EPA and the Tribe in writing:
 - 4.1.7.3.1. The identity of the stack or emission point where excess emissions occurred;

- 4.1.7.3.2. The magnitude of excess emissions expressed in terms of permit conditions;
 - 4.1.7.3.3. The time and duration of excess emissions;
 - 4.1.7.3.4. The reason(s) for the excess emissions;
 - 4.1.7.3.5. Steps and procedures taken to minimize excess emissions;
 - 4.1.7.3.6. Steps and procedures taken or anticipated to be taken to prevent reoccurrence of the excess emissions.
- 4.1.7.4. Even if the reporting and other requirements of this section are satisfied, the Source will be considered to be in violation of the permit if EPA or the Tribe determines that the information submitted does not evidence a malfunction, upset condition, startup, or shut-down and the Source exceeded the emission limits shown in Table I (PSD Emission Limits).

4.1.8. Emissions Inventory

- 4.1.8.1. The Applicant shall submit an annual emission inventory for the Source to EPA and the Tribe by April 1 of each year for all Point source air emissions released during the period from January 1 to December 31 of the previous year.
- 4.1.8.2. The emissions inventory shall contain the information listed below:
- 4.1.8.2.1. Year of record for emissions
 - 4.1.8.2.2. Plant name
 - 4.1.8.2.3. Plant location/street address
 - 4.1.8.2.4. City, State, and zip code
 - 4.1.8.2.5. Plant latitude
 - 4.1.8.2.6. Plant longitude

- 4.1.8.2.7. UTM description (section, township, range)
- 4.1.8.2.8. Primary SIC code
- 4.1.8.2.9. SCC number
- 4.1.8.2.10. Principal product
- 4.1.8.2.11. Plant contact and telephone number
- 4.1.8.2.12. Estimated hours of operation per year of each point source
- 4.1.8.2.13. Estimated amount of fuel consumed by each point source
- 4.1.8.2.14. Stack height (ft) of each point source
- 4.1.8.2.15. Stack diameter (ft) of each point source
- 4.1.8.2.16. Temperatures of exit gases (degrees F) from engine stacks
- 4.1.8.2.17. Exhaust gas flow rate (ACFM) from each engine stack
- 4.1.8.2.18. Exit gas velocity (ft/sec) from each engine stack
- 4.1.8.2.19. CAS code for each pollutant
- 4.1.8.2.20. Measured emissions (lbs/day and TPY) for each point source that is tested
- 4.1.8.2.21. Calculated emissions (lbs/day and TPY) for each point source not tested
- 4.1.8.2.22. Emission factors used to calculate emissions
- 4.1.8.2.23. Permit emission limits (lbs/day and TPY) for each point source
- 4.1.8.2.24. Point source design capacity (i.e. engine brake horsepower and burner Btu rating)

- 4.1.8.2.25. Actual average point source capacity operation (i.e. engine's derated brake horsepower)
- 4.1.8.2.26. Type of control device and its efficiency for each point source (if applicable)
- 4.1.8.2.27. Hours of uncontrolled operation of engines due to engine replacement/overhaul

4.1.9. Compressor Engine Replacement/Overhaul

- 4.1.9.1. The Applicant may replace an existing 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.
- 4.1.9.2. The Applicant 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 or the Tribe, in writing. The applicant shall keep a record of the number of hours of operation of the uncontrolled replacement / overhauled engine and submit this information to EPA and the Tribe with the initial compliance demonstration test report.
- 4.1.9.3. The Applicant shall conduct a compliance demonstration test on the replacement / overhauled engine. The compliance demonstration shall measure NO_x and CO emissions from the replaced / overhauled engine using a portable analyzer and monitoring protocol approved by EPA. This demonstration shall be conducted within 60 (sixty) calendar days of engine startup.
- 4.1.9.4. The Applicant shall provide notice to EPA and the Tribe of such compliance demonstration testing in accordance with the conditions of this permit. The Applicant shall adhere to the recordkeeping and reporting requirements of

this permit for the compliance demonstration of the replacement / overhauled engine.

5. Reserved – Consent Decree Requirements

6. Compliance Assurance Monitoring (CAM) Requirements

6.1. 40 CFR Part 64 Compliance Assurance Monitoring [40 CFR 64.1 – 40 CFR 64.10]

Notwithstanding the conditions in this permit, the permittee shall comply with all applicable conditions of 40 CFR Part 64 - CAM.

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

TS2-1 - Waukesha L5790GSI 4SRB SI Natural Gas-Fired Compressor Engine,
1,215 Nameplate Rated HP

TS2-2 - Waukesha L5790GSI 4SRB SI Natural Gas-Fired Compressor Engine,
1,215 Nameplate Rated HP

[40 CFR 64.2]

- 6.1.2. Excursions, as defined in the CAM plan, shall be reported in accordance with the [Facility-Wide Reporting Requirements](#) section of this permit.

6.1.3. Operation of Approved Monitoring

- 6.1.3.1. 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.

- 6.1.3.2. 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 on all required levels) at all times that the pollutant-specific emissions unit is operating, Data recorded during monitoring malfunction, associated repairs,

and required quality assurance or control activities shall not be used for purposes of these CAM requirements, including data averages and calculation, 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.

- 6.1.3.3. 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.
- 6.1.3.4. Determination of whether the owner or 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.
- 6.1.3.5. 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]

- 6.1.4. Based on the results of a determination made under §64.7(d)(2), 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]

- 6.1.5. 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.

- 6.1.6. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written QIP and any activities undertaken to implement a QIP, and any 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]

7. Enhanced Monitoring, Recordkeeping, and Reporting

Any documents required to be submitted under this Title V operating permit, including but not limited to, reports, test data, monitoring data, notifications, compliance certifications, fee calculation worksheets, and applications for renewals and permit modifications shall be submitted to the Tribe:

by email at: airquality@southernute-nsn.gov

or 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

Section IV – Appendix

1. Inspection Information

1.1. Driving Directions:

Drive north on US 550 past the Colorado State line to approximately mile marker 4.6. Turn right on La Plata County Road 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.

1.2. Global Positioning System (GPS):

Latitude: 37.008517° N

Longitude: -107.744849° W

1.3. Safety Considerations:

All visitors to the Treating Site #2 Compressor Station wear a hard hat, safety glasses, safety glasses, safety footwear, hearing protection, and fire retardant clothing.

2. BP America Production Company, Treating Site #2 Compressor Station, Compliance Assurance Monitoring (CAM) Plan

2.1. Background

2.1.1. Emission Unit

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

Identification: TS2-1, TS2-2

Facility: Treating Site #2 Compressor Station, Southern Ute Indian Reservation, La Plata County, Colorado.

2.1.2. Applicable Regulation, Emission Limits and Pre-CAM Monitoring Requirements

Applicable Regulation: PSD Permit # PSD-SU-007-95.01

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.

2.1.3. Control Technology and Potential to Emit

Controls: Non-selective catalytic reduction

Potential pre-control device emissions¹: NOx: 48.2 lbs/hr; 211 TPY

CO: 75 lbs/hr; 328.5 TPY

Potential post-control device emissions²: NOx: 2.7 lbs/hr; 11.7 TPY

CO: 5.4 lbs/hr; 23.5 TPY

^[1]Based on 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.

3.2. 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.

3.3. 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 Compressor Station Catalytic Converters TS2-1, 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	An excursion is defined as a pressure	NOx above 2.7 lbs/hr, or CO above 5.4 lbs/hr.

	maintained at less than or equal to 1250°F.	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.	
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 continuously monitored by an automatic system designed to perform engine shutdown when catalyst temperature exceeds 1250°F.	Pressure differential is monitored at least once per calendar month. No monitoring is required for months when engine is not operated.	Semiannual 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.

¹Benchmark values for the 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 catalyst. Within 60 days of installing a new catalyst, portable analyzer emissions monitoring will be performed to demonstrate compliance with emission limits.

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

JUSTIFICATION

I. Background

The monitoring approach outlined here applies to the three-way non-selective catalytic reduction (NSCR) system used on two rich-burn, natural gas-fired, compressor engines (TS2-1, TS2-2). The catalyst system is a passive unit and does not have mechanical components. The reduction reaction does not take place properly if the temperature of the engine exhaust gas into the catalyst system is too high. A significant change in pressure drop across the catalyst can indicate damage or fouling to the catalyst.

II. Rationale for Selection of Performance Indicators

Temperature of exhaust gas into the catalyst unit is measured continuously because temperature excursions can indicate problems with engine operation that can prevent the chemical reaction from taking place in the catalyst bed. Too high of an exhaust gas temperature can indicate engine problems which can damage the catalyst unit.

Pressure differential across the catalyst is measured monthly because a significant pressure change from the reference pressure differential can indicate the catalyst unit is physically damaged. Decreased pressure differential can indicate channeling or other problems. Increased pressure differential can indicate fouling/plugging in the catalyst. Both conditions would result in reduced catalyst performance.

Semiannual NO_x and CO emissions monitoring is conducted to ensure continuous compliance with permitted emission limits and to determine if the catalyst system is chemically damaged. Emission monitoring measurements must be conducted using an approved portable monitoring protocol or EPA Reference Methods.

III. Rationale for Selection of Indicator Ranges

An exhaust gas temperature range of less than or equal to 1250°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 Compressor Station 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.