

**Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No. V-SUIT-0009-2020.01
Minor Permit Revision
August 2, 2021**



**SIMCOE, LLC
Salvador I/II Central Delivery Point
Southern Ute Indian Reservation
La Plata County, Colorado**

Description of Permit Revision

On May 14, 2021, the Southern Ute Indian Tribe Air Quality Program (AQP) received a minor permit revision application from SIMCOE, LLC (SIMCOE) for the Salvador I/II Central Delivery Point (Salvador I/II).

SIMCOE conducted three engine exchanges in calendar year 2020. Two of the engine exchanges did not meet the requirements for an off-permit change or alternative operating scenario as outlined in RAC 2-116(2) and RAC 2-110(8) respectively. SIMCOE submitted a minor permit revision to incorporate the replacement engines and revised applicability to 40 CFR 60, Subpart JJJJ and 40 CFR 63, Subpart ZZZZ into the Title V permit for Salvador I/II.

SIMCOE submitted the following information in their minor permit revision application:

- A cover letter outlining the request, identifying the engines which were replaced, a statement that the PTE at Salvador I/II had not changed, and an applicability analysis for 40 CFR 60, Subpart JJJJ.
- EUD-1 forms for Units 1, 3 and 4.
- A signed CTAC form signed by the responsible official.

SIMCOE submitted an additional applicability analysis for 40 CFR 63, Subpart ZZZZ following the initial submittal of the minor permit revision application.

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

Section I.2. Source Emission Points – Table 1 -Emission Units

- Updated serial numbers and installation dates for Units 1, 3, and 4.

Section III.1.1. - 40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

- Removed Unit 1 from affected sources and added Unit 4.
 - After the replacement of Unit 1, Unit 1 is no longer subject to 40 CFR 60, Subpart JJJJ requirements for modified or reconstructed engines with a maximum horsepower greater than 25.
 - After the replacement of Unit 4, Unit 4 is now subject to 40 CFR 60, Subpart JJJJ requirements for modified or reconstructed engines with a maximum horsepower

greater than 25

Section III.2.2. - 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

- Removed Unit 4 from affected sources and added Unit 1.
 - Unit 1 is now subject to the maintenance requirements for remote 4SLB stationary RICE with a site rating greater than 500 horsepower at an area source of HAP.
 - After the replacement of Unit 4, Unit 4 is a 4SRB stationary RICE at an area source of HAP and meets the exemption at 40 CFR §63.6590(c)(1) by meeting the requirements of 40 CFR 60, Subpart JJJJ.

AQP is making these revisions as a minor permit revision in accordance with RAC 2-111(3). The permit will be reissued as permit number V-SUIT-0009-2020.01.

For specific applicability information regarding the Title V permit for this facility, please reference the Statement of Basis for permit number V-SUIT-0009-2020.00.