



**Air Pollution to Control
Title V Permit to Operate
Statement of Basis for Permit No V-SUIT-0027-2017.03
Significant Permit Revision
November 15, 2021**

**Harvest Four Corners, LLC
Ignacio Gas Plant
Southern Ute Indian Reservation
La Plata County, Colorado**

Description of Permit Revision

On January 9, 2021, the Southern Ute Indian Tribe Air Quality Program (AQP) received a permit revision request from Harvest Four Corners, LLC (Harvest) for the Ignacio Gas Plant. Harvest requested the permit be revised to incorporate emission units B001 and B002 (Deltak Delta 3S6-347 Natural Gas-Fired Waste Heat Recovery Boilers, 29 MMBtu/hr) into the Title V permit for the Ignacio Gas Plant. Harvest also stated that the Ignacio Gas Plant was no longer a major source of HAP as defined under Section 112 of the Clean Air Act.

In accordance with the significant permit requirements of RAC § 2-111(4). Harvest provided the following information to the AQP:

- A cover letter detailing the significant permit revision request and identifying the emission units to be revised.
- EUD-2 forms for emission units B001 and B002.
- EMISS forms for emission units B001 and B002
- Potential to Emit (PTE) form for the facility
- Supporting emission calculations
- Applicability analysis
- A Certification of Truth, Accuracy, and Completeness form signed by the Responsible Official.

The AQP reviewed the application and determined the permit revision request did not meet the reclassification requirements outlined in the EPA amendments to the General Provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) titled "Reclassification of Major Sources as Area Sources Under Section 122 of the Clean Air Act" (MM2A), published in the Federal Register on November 19, 2020. On May 13, 2021, the AQP requested the following additional information to complete the reclassification request:

- A formal declaration/statement and supporting information prepared in accordance with the 40 CFR 63 Subpart A notification requirements in §63.9(b) per §63.9(j) that, through this revision, Harvest intends to reclassify the Ignacio Gas Plant from a major source to an area source of HAPs for the purposes of NESHAP and intends to comply with all area source requirements as of the effective date of the reclassification.
- Updated potential to emit calculations for each subject emission unit at the Ignacio Gas Plant and the facility-wide totals.
- An applicability analysis specifically outlining the NESHAP area source provisions that will

become applicable following the reclassification at the Ignacio Gas Plant.

On June 11, 2021, Harvest provided the requested information and additionally requested to update the serial numbers for the five (5) natural gas-fired turbines (Emission units 27, 28, 29, 30, and 31). Harvest provided the following information:

- A cover letter detailing the significant permit revision request, including Harvest intent to reclassify as an area source, intent to comply with applicable area source requirements upon issuance of the revised Title V operating permit, and the request to correct serial numbers for emission units 27, 28, 29, 30, and 31.
- A NESHAP applicability analysis, including all applicable and potentially applicable subparts.
- Potential to emit calculations for the facility and for each significant emission unit, including supporting documentation for the calculations.
- Updated EUD-1 forms for emission units 27, 28, 29, 30, and 31.

On September 29, 2021, Harvest requested to update the serial number for turbine Unit 29 after a like-kind exchange that was performed on September 29, 2021. Harvest provided the following information:

- A letter in accordance with permit condition II.2.3., Harvest Four Corners, LLC notifying that emission unit 29 had a like-kind replacement completed on September 29, 2021. Harvest stated the change was completed through Solar's turbine exchange program and the replacement unit is of the same make, model, and horsepower, and is configured to operate in the same manner as the unit that was replaced. Harvest stated there are no changes in pollutants emitted, emission levels, or applicable requirements as a result of this engine replacement.

The AQP has made the following changes to the permit requested in the revision application:

- Section III.1.7.: Incorporated 40 CFR Part 60, Subpart Dc for affected units B001 and B002.
 - The Ignacio gas plant is subject to the requirements of Subpart Dc after the addition of emission units B001 and B002 and the reclassification to area source.
- Section III.2.1.: Revised 40 CFR Part 63, Subpart HH with new applicability and requirements.
 - The Ignacio Gas Plant meets the Subpart HH benzene exemption at 40 CFR 63.764(e)(1)(ii).
- Section III.2.2.: Revised 40 CFR Part 63, Subpart ZZZZ with new applicability.
 - The Ignacio Gas Plant is now subject to the area source requirements for emergency engines and is subject to the maintenance requirements of Table 2d.
- Section III.2.3.: Removed 40 CFR Part 63, Subpart DDDDD.
 - The Ignacio Gas Plant is no longer subject to the requirements of Subpart DDDDD as this regulation is only applicable to major sources of HAP.
- Section III.2.3.: Incorporated 40 CFR Part 63, Subpart CCCCCC.
 - The Ignacio Gas Plant is now subject to Subpart CCCCCC area source requirements for gasoline dispensing facilities (GDF). The Ignacio Gas Plant is required to be able to demonstrate that the monthly throughput of emission unit TK-1 (582 gal gasoline storage tank) is less than 10,000 gallons per month and to operate and maintain the GDF in a manner consistent with safety and good air pollution control practices for minimizing emissions.

The AQP has made the following changes to the permit not requested in the revision application:

- Updated permit numbers and permitting dates.
- Section II.1.1.5.1.: Updated annual fee calculation citation to align with RAC 2-119(2)(a).
 - This change was incorporated to update the permit to AQP's most current Title V permit template.
- Section II.2.3.: Combined Alternative Operating Scenarios sections 2.3. and 2.4. for greater clarity.

- This change was incorporated to update the permit to AQP’s most current Title V permit template.
- Section II.2.5.: Incorporated Stratospheric Ozone and Climate Protection requirements.
 - This change was incorporated to update the permit to AQP’s most current Title V permit template.
- Section III.7.: Incorporated Enhanced Monitoring , Recordkeeping, and Reporting section.
 - This change was incorporated to update the permit to AQP’s most current Title V permit template and ensure compliance with monitoring, recordkeeping, and reporting for all Title V and New Source Review permit requirements.

Potential to Emit Discussion

Emission units B001 and B002, 29 MMBtu/hr Natural Gas-Fired Waste Heat Recovery Boilers, are located at Northwest Pipeline - La Plata B Compressor Station and were previously incorporated in the Title V permit for that facility. Due to the emission units now being operated by Harvest Four Corners, at Harvest’s request, the emission units are being transferred into the Title V permit for the Ignacio Gas Plant. A previous single source determination, on August 17, 1999, by EPA Region 8 determined that the La Plata B Compressor Station, the Ignacio Gas Plant, and Transwestern Pipeline Company La Plata A Compressor Station, should be aggregated as a single source for the purposes of Title V and PSD. Separate Title V permits have been issued to each facility but the three facilities remain to be considered a single source. The transfer of operation of emission units B001 and B002 equally reduced emissions from the La Plata B Compressor Station Title V permit and increased emissions in the Ignacio Gas Plant Title V permit. No major modifications occurred. The revised PTE for the Ignacio Gas Plant is outlined in the table below. The revised PTE for La Plata B Compressor Station can be found in the Statement of Basis for V-SUIT-0029-2019.01.

	Regulated Air Pollutants in tpy						
	NOx	VOC	SO ₂	PM ₁₀	CO	Total HAP	GHGs
Previous facility PTE	319.8	228.0	44.8	49.5	307.6	16.3	263,442.2
B001	12.5	0.7	0.8	1.0	10.5	0.2	13,547.0
B002	12.5	0.7	0.8	1.0	10.5	0.2	13,547.0
Revised Facility PTE	344.8	229.4	46.4	51.5	328.6	16.7	290,536.2

The AQP is making this revision as a significant permit revision in accordance with RAC 2-111(4). The permit will be reissued as permit number V-SUIT-0027-2017.03.

For specific applicability information regarding the Title V permit for this facility, please reference the Statement of Basis for permit number V-SUIT-0027-2017.00.