



**Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No. V-SUIT-0023-2018.01
November 30, 2021**

**Public Service Company of Colorado
Tiffany Compressor Station
Southern Ute Indian Reservation
La Plata County, Colorado**

Description of Permit Revision

On September 1, 2021, the Southern Ute Indian Tribe Air Quality Program (AQP) received a minor permit revision application from Excel Energy/Public Service Company of Colorado (PSCo) for the Tiffany Compressor Station.

PSCo requested to remove the three existing triethylene (TEG) glycol dehydration units (D001 & D002 - each 14MMscf/day, D003 – 10MMscf/day) from the permit and replace them with one new TEG glycol dehydration unit (D004) rated at 30MMscf/day.

In accordance with the minor permit requirements of RAC § 2-111(3), PSCo submitted the following information to the AQP:

- A cover letter outlining the request, identifying the units to be replaced
- Updated GIS Form
- Updated PTE Form
- Updated EMISS Form
- EUD-3 form for D004
- Inlet gas analysis used for GRI-GLYCalc input
- Updated GRI-GLYCalc input and emissions summary
- A Certification of Truth, Accuracy, and Completeness CTAC form signed by the responsible official

The requested revision:

- does not violate any applicable requirement
- does not involve significant permit revisions to existing monitoring, reporting, or recordkeeping requirements
- does not require or change any case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis
- does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the permittee has assumed to avoid an applicable requirement to which the source would be otherwise subject, including any federally enforceable emission cap assumed to avoid classification as a modification under title I of the Clean Air Act and any alternative emissions limit approved pursuant to regulations promulgated under § 112(i)(5) of the Clean Air Act, and 42 U.S.C. § 7412(i)(5)
- is not a title I modification

- is not required to be processed as a significant permit revision pursuant to § 2-111(4) of the RAC

Applicability Analysis:

40 CFR Part 63, Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. This subpart applies to the owners and operators of affected units located at natural gas production facilities that are major or area sources of HAPs, as defined by §63.761, and that process, upgrade, or store natural gas prior to the point of custody transfer, or that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. For the purpose of this subpart, natural gas enters the transmission and storage category after the natural gas processing plant, when present. Affected units for this subpart are outlined for area and major sources at §63.670(b).

According to PSCo, the Tiffany Compressor Station is a natural gas transmission facility and not a natural gas production facility. **Therefore, Subpart HH does not apply.**

40 CFR Part 63, Subpart HHH: National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities. This subpart applies to natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user, and that are a major source of hazardous air pollutant (HAP) emissions. Natural gas transmission means the pipelines are used for long distance transport (excluding processing).

According to PSCo, the Tiffany Compressor Station's potential HAP emissions are below the major source thresholds. **Therefore, Subpart HHH does not apply.**

Removal of emission units D001, D002, and D003 and the installation of emission unit D004, reduced the potential to emit (PTE) of the Tiffany Compressor Station. Changes in PTE at the Tiffany Compressor Station are reflected in the table below.

	Regulated Air Pollutants in tpy							
	NO _x	VOC	SO ₂	PM ₁₀	CO	Total HAP	Largest Single HAP (Xylene)	GHGs
Previous facility PTE	259.0	21.9	0.1	0.8	199.7	11.0	4.4	21,868
D004	0.0	0.7	0.0	0.0	0.0	0.5	0.3	1,266
Revised Facility PTE	259.0	9.5	0.0	0.7	199.1	2.6	0.3	11,080

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

- Section I.1. Process Description: Updated the description to state the operations of only one TEG dehydrator
 - As requested, AQP removed units D001-D003 and added D004
- Section I.2. Source Emission Points – Table 1 Emission Units: Updated the table to reflect the new TEG dehydrator and installation date
 - As requested, AQP included the information for D004 and removed D001-D003

- Section I.2. Source Emission Points – Table 2 Insignificant Emission Units: Updated the table to reflect the removal of glycol reboiler burners for D001, D002, and D003

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.

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-0023-2018.01.

For specific applicability information regarding the Title V permit for this facility, please reference the Statement of Basis for permit number V-SUIT-0023-2018.00.