



**United States Environmental Protection Agency
Region 8 Air and Radiation Division
40 CFR Part 49 Tribal Minor New Source Review Permit to Construct
Technical Support Document
Proposed Permit # SMNSR-SU-000049-2022.002**

Red Cedar Gathering Company
Sambrito Compressor Station
Southern Ute Indian Reservation
La Plata County, Colorado

In accordance with the requirements of the Tribal Minor New Source Review (MNSR) Permit Program at 40 CFR part 49, this federal permit to construct is being issued under authority of the Clean Air Act (CAA). The EPA has prepared this technical support document describing the conditions of this permit and presents information that is germane to this permit action.

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I. Introduction

On November 18, 2011, the EPA received an application from Red Cedar Gathering Company (Red Cedar) requesting a synthetic minor permit to limit carbon monoxide emissions from compressor engines at the existing Sambrito Compressor Station in accordance the requirements of the Tribal Minor New Source Review Permit Program at 40 CFR Part 49 (MNSR). A public comment period was held, and the final permit became effective on July 5, 2014.

On June 17, 2022, the EPA received an application from Red Cedar requesting to revise the Sambrito Compressor Station Synthetic MNSR permit. Red Cedar requested the following permit revisions; align the synthetic MNSR permit with the facility's applicable requirements of 40 CFR part 63, subpart ZZZZ, and its effective Title V operating permit; remove certain engine monitoring and corrective action requirements considered unnecessarily burdensome; and correct typographical errors. The proposed permit reflects some of the requested changes based on the EPA's evaluation.

The Sambrito Compressor Station is located within the exterior boundaries of the Southern Ute Indian reservation in Colorado. The facility provides natural gas field compression and dehydration to remove entrained water vapor from the gas stream. The natural gas comes from upstream coal-bed methane production wells and compressor stations connected to a gathering pipeline system to the inlet of the facility.

The proposed permit contains emissions limits, construction and operational limitations and associated monitoring, recordkeeping and reporting requirements. Upon compliance with the final permit, Red Cedar will have legally and practicably enforceable restrictions on emissions that can be used when determining the applicability of other CAA permitting requirements, such as those imposed by the PSD Permit Program at 40 CFR part 52. The EPA has determined that issuance of this MNSR permit will not contribute to National Ambient Air Quality Standards (NAAQS) violations.

II. Facility Description

The Sambrito Compressor Station is located on the Southern Ute Indian Reservation in the southwest ¼ of Section 3, Township 32 North, Range 6 West, La Plata County, Colorado, at latitude 37.043769N and longitude -107.493169W.

The Sambrito Compressor Station is a production field facility prior to the point of custody transfer. Natural gas product is provided to the facility from several upstream wells and compressor stations. The process consists of compressing wet natural gas from the field and treating the gas through three triethylene glycol (TEG) dehydration systems to remove entrained water vapor from the gas stream. The facility does not extract natural gas liquids (NGLs) from field gas nor fractionate mixed NGLs to natural gas products. The facility has liquids storage vessels, but none with the potential for flash emissions. The facility does engage in pipeline pigging operations, however, all pipeline gas is treated through the equipment at the facility during these operations. Insignificant emissions from these units occur only during launch and retrieval operations.

III. Proposed Synthetic Minor Permit Action

Red Cedar requested to change the minimum compressor engine catalyst inlet temperature from 550°F to 450°F and the engine emissions monitoring frequency from “every 30 days” to “once per month,” consistent with subpart ZZZZ. The EPA is proposing the catalyst inlet temperature change as requested. The EPA is proposing a somewhat modified version of the requested engine emissions monitoring frequency change from “every 30 days” to “at least once every 30 days.” This change will provide Red Cedar with desired flexibility to not have to conduct the monitoring exactly on the 30th day, but will avoid the potential for consecutive monitoring events to occur as much as 60 days apart, which may lead to delayed identification of a problem with engine operations.

In addition, Red Cedar requested the removal of the requirement to conduct portable analyzer testing when the pressure drop across the catalyst bed exceeds \pm two (2) inches of water from the baseline pressure drop reading taken during the most recent performance test and cannot be corrected by following the catalytic control system manufacturer’s recommended procedures or the system is damaged. The original intent of this requirement was to establish a new temporary baseline pressure drop until a performance test could be scheduled and completed within 90 days. Red Cedar requested its removal to avoid unnecessary back-to-back intensive portable analyzer testing and engine performance testing. This requested change would be a relaxation of current permitted monitoring requirements and could result in performance issues with a replaced catalyst that may not be identified for up to 3 months after engine startup with the new catalyst, not until the time of the required performance test. The EPA is soliciting comment on this proposed change, including alternative changes that would achieve appropriate temporary monitoring of new catalysts that is not as burdensome as a formal portable analyzer test.

Red Cedar also requested the addition of permit terms requiring corrective action if an engine catalyst is replaced and performance testing within 90 days to establish a new pressure drop across the catalyst bed along with the removal of “or replacement of the catalyst.” The requested removal of the latter is identified as the corrective action in the following requested additional sentence and is therefore deemed necessary.

Lastly, Red Cedar requested inadvertent typographical errors to be corrected, which the proposed permit reflects.

IV. Tribal Consultations and Communications

All minor source applications (synthetic minor, minor modification to an existing facility, new true minor and general permit) are submitted to both the tribe and the EPA per the application instructions (see <https://www.epa.gov/caa-permitting/tribal-nsr-permits-region-8>). We ask the tribe to communicate to the EPA any preliminary questions and comments on the application within 10 business days from the receipt of the application. In the event an AQIA is triggered, we email a copy of that document to the tribe within 5 business days from the date that we receive it.

Additionally, we notify the tribe of the public comment period for the proposed permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the

Reservation. We also notify the tribe of the issuance of the final permit.

V. Enhanced Public Participation

Enhanced Public Participation

Given the presence of potentially overburdened communities in the vicinity of the facility, we are providing an enhanced public participation process for this permit.

1. Interested parties can subscribe to the EPA email list that notifies them of public comment opportunities on the Southern Ute Indian Reservation for proposed air pollution control permits via email at <https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8>.
2. All minor source applications (synthetic minor, modification to an existing facility, new true minor or general permit) are submitted to both the tribe and the EPA per the application instructions (see <https://www.epa.gov/caa-permitting/tribal-nsr-permits-region-8>).
3. We ask that the tribe communicate to the EPA any preliminary questions and comments on the application within 10 business days of receiving it.
4. In the event an AQIA is triggered, we email a copy of that document to the tribe within 5 business days from the date we receive it.
5. We notify the tribe of the public comment period for the proposed permit and provide copies of the notice of public comment opportunity to post in various locations of their choosing on the Reservation. We also notify the tribe of the issuance of the final permit.
6. We offer tribal government leaders an opportunity to consult on all major and certain synthetic MNSR permit actions. The EPA sent an email on June 17, 2022, to the Southern Ute Indian Tribe notifying the requested permit revisions and requesting any comments the Tribe may have. The Tribe provided feedback on the requested revisions from Red Cedar on June 23, 2022.

VI. Authority

Requirements under 40 CFR part 49 to obtain a permit apply to new and modified minor stationary sources, and minor modifications at existing major stationary sources (“major” as defined in 40 CFR 52.21). In addition, the MNSR Permit Program provides a mechanism for an otherwise major stationary source to voluntarily accept restrictions on its potential to emit to become a synthetic minor source.

We are charged with direct implementation of these provisions where there is no approved Tribal implementation plan for implementation of the MNSR regulations. Pursuant to section 301(d)(4) of the CAA (42 U.S.C. Section 7601(d)), we are authorized to implement the MNSR regulations at

40 CFR part 49 in Indian country. Sambrito Compressor Station is located on Indian country lands within the boundaries of the Southern Ute Indian Reservation in La Plata County, Colorado. The exact location is Latitude 37.043769N, Longitude -107.493169W.

VII. Public Notice and Comment, Hearing and Appeals

A. Public Comment Period

In accordance with 40 CFR 49.157, we must provide public notice and a 30-day public comment period to ensure that the affected community and the general public have reasonable access to the application and proposed permit information.

For information regarding review of the application, the proposed permit, this technical support document and all supporting materials for the proposed permit, please use the following contacts:

Southern Ute Indian Tribe

Air Quality Program

Contact: Danny Powers, Manager, Air Quality Program, (970) 563-2265 or
dpowers@southernute-nsn.gov

and

U.S. EPA

Region 8 Air and Radiation Division

Contact: Lohitaksha (Lo.) Rao, Environmental Scientist, (303) 312-6249 or
rao.lohitaksha@epa.gov

The proposed permit and related documents can be accessed on our website at:

<https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8>.

Any person may submit written comments on the proposed permit and may request a public hearing during the public comment period. These comments must raise any reasonably ascertainable issues with supporting arguments by the close of the public comment period (including any public hearing). Comments may be sent to the EPA address above, or sent via an email to r8airpermitting@epa.gov, with the topic “Comments on SMNSR Permit for the Sambrito Compressor Station,” or submitted directly through <https://www.regulations.gov>, from Docket ID # [EPA-R08-OAR-2022-0545](https://www.regulations.gov). All comments will be considered and answered by the EPA in making the final decision on the permit. The EPA keeps a record of the commenters and of the issues raised during the public participation process.

B. Public Hearing

A request for a public hearing must be in writing and must state the nature of the issues proposed to be raised at the hearing. We will hold a hearing whenever there is, on the basis of requests, a

significant degree of public interest in a proposed permit. We may also hold a public hearing at our discretion whenever, for instance, such a hearing might clarify one or more issues involved in the permit decision.

C. Final Permit Action

In accordance with 40 CFR 49.159, a final permit becomes effective 30 days after permit issuance, unless: (1) a later effective date is specified in the permit; (2) appeal of the final permit is made as detailed in the next section; or (3) we may make the permit effective immediately upon issuance if no comments resulted in a change or denial of the proposed permit. We will send notice of the final permit action to any individual who commented on the proposed permit during the public comment period. In addition, the source will be added to a list of final permit actions which is posted on our website at: <https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8>. Anyone may request a copy of the final permit at any time by contacting the Tribal Air Permit Program at (800) 227–8917 or sending an email to r8airpermitting@epa.gov.

D. Appeals to the Environmental Appeals Board

In accordance with 40 CFR 49.159, within 30 days after a final permit decision has been issued, any person who filed comments on the proposed permit or participated in the public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.