



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202 – 2733

April 9, 2019

Mr. Bradley Cooley
Enterprise Field Services LLC
Senior Manager, Environmental Permitting
1100 Louisiana Street
Houston, TX 77002

Re: Administrative Amendment to the Part 71 Operating Permit Number R6NM-03-R1

Dear Mr. Cooley:

On March 9, 2019, the EPA received a permit amendment request from Enterprise Field Services LLC for the Lindrith Compressor Station on Jicarilla Apache tribal land. The amendment requested that EPA amend the Lindrith Compressor Station Part 71 operating permit (R6NM-03-R1), issued on November 4, 2015, to incorporate permit changes authorized by EPA in the March 7, 2018, synthetic minor NSR permit R6NSR-NM-005.

Since the synthetic minor NSR permit was not a major NSR action and it met the procedural requirements of 40 CFR 71.7 and 40 CFR 71.8 and there are no additional changes to the existing Part 71 operating permit, the existing permit is administratively amended, by incorporating by reference the above synthetic minor permit and is effective immediately upon issuance. See 40 CFR 71.7(d)(1)(v). The conditions that have been changed are noted in the enclosure. A copy of this letter will be sent to the Jicarilla Apache Nation Environmental Protection Office

Please note that this amendment will not change the effective date of the original operating permit, nor the expiration date of existing operating permit which is November 3, 2020. At the renewal of the existing Part 71 permit in November 2020, the limits and conditions of the synthetic minor permit will be written directly into the permit by EPA. If you have any questions, please contact Jeffrey Robinson at 214-665-6435 or Bonnie Braganza at 214-665-7340.

Sincerely,

4/9/2019

 Wren Stenger

Wren Stenger

Signed by: WREN STENGER

Director
Multimedia Division

Enclosure

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Enclosure
Administrative Changes to the Part 71 Operating Permit R6NM-03-R1

Changes to the Permit Information and Conditions

Permit Condition Amended in R6NM-03-R1	New Conditions incorporated from R6NSR-NM-005
Section 1.1 Mr. Graham Bacon Senior Vice President, Operations & EHS&T	Mr. Graham Bacon to Mr. Bradley Cooley, Senior Manager, Environmental.
Table 1 emissions changes for VOC	MSS - 30 tpy T-Battery -102.63 tpy T-LOAD - 4.98 tpy
Table 3 Applicable Requirements for Enterprise Field Services LLC, Lindrith Compressor Station	Citation PSD-NM-1644-M1 no longer exists since it has been rescinded on issuance of the synthetic minor permit.
General Conditions: Section 3.2.1 reference to conditions in the PSD permit	General Permit condition 3.2.1 is voided,
Section 3.3.3 reference to throughput of 20, 000bbl/yr	Condensate throughput at the TBATTERY shall not exceed 60,000bbls on an annual basis
	Samples of the condensate to TBATTERY should be analyzed on an annual basis to determine the molecular weight, vapor pressure and temperature, using standard industrial methods. The analyses should not be performed more than 365 days apart.
	All meters used to provide data to determine compliance with the permit limits shall be calibrated annually and may use the procedures specified by the instrument meter manufacturer, or a method published by a consensus-based standard organization such as ASTM or API, or AGA.
.	Monitor and record the field natural gas flow rate each compressor engine and keep records of the flow to each unit on a 12-month rolling average
.	Calculate and record the MMBtu/hr to each engine based on the flow and analyses of the field gas to the units.
	Monitor the flow of condensate to the TBATTERY using the truck on a monthly basis and record total throughput based on a 12-month rolling basis.
	Monitor the volume of condensate to TLOAD on a monthly basis using the truck loading tickets, and record totals based on a 12-month rolling basis.
	Document daily the number of pipeline pigging events to the pipeline pig receiver for MSS emissions and total the daily record for the month. Records shall be kept of the monthly total volume of gas vented during SSM events in MMSCF and of the annual inlet gas analysis specifying the percent VOC. The calculated monthly total shall be used to calculate the monthly rolling 12-month total VOC emissions.

	<p>Section V6: For each engine and its respective catalytic control system, the Permittee shall follow the manufacturer recommended maintenance schedule and procedures or equivalent maintenance schedule and procedures developed by the Permittee or vendor to ensure optimum performance of each engine and its respective catalytic control system. See Appendix B, (of R6NSR-NM-005).</p>
	<p>SectionV7: The engine exhaust temperature for the two compressor engines [EPN A-01 and EPNA-02] shall be monitored at the inlet of the oxidation catalyst system and be always maintained between the minimum and maximum parameters as in the warranty representation of the catalyst the engines operate outside the parameters corrective action as stated in Special Condition V.9 should be taken.</p>
	<p>Section V8: Continuous catalyst performance shall also be demonstrated by the pressure drop and temperature differential across the catalyst and shall not exceed the recommendation from the catalyst manufacturer or plus 10% from the baseline pressure drop across the catalyst measured during the initial performance test. If the pressure drop exceeds the limits stated above, Special Condition V.9 should be taken immediately. See Appendix B (of R6NSR-NM-005) for representative catalyst monitoring.</p>
	<p>Section V9: Upon determining a deviation from the monitoring as stated above in Special Conditions 6,7, and 8, corrective action shall be taken to assess the performance problems of the oxidation catalyst. If immediate remedy is not possible, then the affected engine shall cease operating within 24 hours and shall not be returned to routine service until the deviation is resolved. EPA will be notified of the problem.</p>
	<p>Record the type of maintenance operations of the compressor engines, catalytic oxidation system, tanks and other pieces of equipment to include the time and date for such an event.</p>
	<p>Monitor and keep records/logs on the performance of the catalyst oxidation system as in Section V, conditions 7, 8 and 10. The records of the maintenance and operation of the catalyst oxidation of the catalyst manufacturer should be kept on site and be readily available when requested.</p>