

TECHNICAL REVIEW: Oil and Gas Checklist

Permit No.:	177621	Company Name:	Natural Gas Pipeline Company of America LLC	APD Reviewer:	Ms. Camryn Appert
Project No.:	380357	Unit Name:	Compressor Station 168	PBR No(s).:	106.512, 106.352(l) 2012-NOV-22

Initial

GENERAL INFORMATION			
Regulated Entity No.:	RN100223551	Date Received by TCEQ:	September 19, 2024
Customer Reference No.:	CN600124200	Date Received by Reviewer:	September 20, 2024
City/County:	Muleshoe, Bailey County	Physical Location:	3000 County Road 21

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Eddie Carreon Operations Director	Phone No.:	(806) 354-3108	Email:	HERIBERTO_CARREON@KINDERMORGAN.COM
Technical Contact/ Consultant Name and Title:	Doug Hamm EHS Engineer	Phone No.: Fax No.:	(719) 329-5634 (806) 984-3330	Email:	DOUGLAS_HAMM@KINDERMORGAN.COM

GENERAL PROJECT INFORMATION	YES	NO	COMMENTS
Is confidential information included in the application?		X	
Are there affected NSR or Title V permits for the project?	X		Title V permit O3194
Are there permit limits on using PBRs at the site?		X	
Is PSD or Nonattainment netting required?		X	Site is an existing minor source, and project emissions are below major source thresholds for PSD permitting.
Has the fee been paid?	X		Reference / Receipt number: 722099 / 582EA000626119
Was an impacts evaluation required for the project?	X		
Have MSS emissions been accounted for in site-wide totals?		X	MSS is claimed under PBR 106.359
Site Specific Analysis used?	X		
Are all vents ≥ 20 ft, and meet 352(l)(4) as applicable?	X		

Compliance History Evaluation - 30 TAC Chapter 60 Rules	
A compliance history report was reviewed on:	September 23, 2024
Site rating & classification:	0.00 / High
Company rating & classification:	0.22 / Satisfactory

PROJECT RULES	How was rule compliance demonstrated? (i.e., checklist, rule language, etc.)
106.352	Compliance was demonstrated using line-by-line rule applicability and the PBR 106.352(l) checklist.
106.512	Compliance was demonstrated using line-by-line rule applicability and the PBR 106.512 checklist.

DESCRIBE THE OVERALL PROCESS AT THE SITE
<p>Natural Gas Pipeline Company of America LLC (NGPL) owns and operates the Compressor Station 168 (CS168) located in Bailey County, Texas.</p> <p>CS168 is a natural gas compressor station that compresses natural gas that enters the facility from the surrounding pipelines and discharges them back to the surrounding pipelines after compression. Natural gas from pipelines will be sent to a Caterpillar G3616, 5,500 hp, natural gas-fired compressor engine (EPN: CS168-3). The compressed gas is discharged from the station via pipeline. Piping fugitive emissions (EPN: FUG) are impacted by this change as "new" piping components will be associated with the new engine.</p>

DESCRIBE THE PROJECT
<p>NGPL submitted an application to authorize the emissions associated with oil and gas production under PBR 106.352(l) and an engine under PBR 106.512.</p> <p>The purpose of this application is to install a new CAT 3616 reciprocating compressor engine. After issuance of this PBR, Unit 2 (CS168-2A/B) will be permanently deactivated with a permit alteration to NSR permit 73441. Existing fugitives were previously authorized under SE and will now all be changed to latest version of 106.352(l) since the increase in horsepower at the site will make the collection of fugitive emissions at the site subject to</p>

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NSPS OOOOb. Therefore, fugitive emissions represented in this registration reflect site-wide fugitives.

There are also small storage tanks and ancillary equipment at the station that were previously authorized under Standard Exemptions and are claimed PBRs 106.102, 106.472, and 106.511. The boiler and fuel gas heater are authorized under SE 8. These sources are not impacted by this project. Additional information is included in the file.

FEDERAL STANDARDS APPLICABILITY

Applicable Rule(s) :	Y	NA	Explanation of how it meets (if applicable), or why it isn't applicable:
NSPS Subpart A	X		NGPL will comply with the applicable general requirements.
NSPS Subpart JJJJ	X		The new engine (EPN CS168-3) will be constructed after January 1, 2011. Therefore, NGPL will comply with NSPS JJJJ requirements.
NSPS Subpart OOOOb	X		NSPS OOOOb will apply to the fugitive piping components and the reciprocating compressor that is installed as a result of this project. NGPL will comply with the requirements, as applicable. This project is a modification under the rule as the new engine increases horsepower (additional compression) at the station. Therefore, site-wide fugitives are subject to NSPS OOOOb.
MACT Subpart A	X		NGPL will comply with the general requirements in Subpart A.
MACT Subpart ZZZZ	X		Engine CS168-3 will be constructed in 2024. Therefore, the engine will be subject to MACT ZZZZ and will comply by complying with NSPS JJJJ.

SITE INFORMATION

What is the Natural Gas Throughput?	503	MMSCF/day
What is the Oil/Condensate Throughput?	-	bbl/day
What is the Produced Water Throughput?	-	bbl/day
Site specific H2S content of inlet gas (ppm)	4	ppm

FACILITY INFORMATION

Equipment:	# of each	Calculation Methodology
Compressor Engines	1	AP-42 and manufacturer data sheets
Fugitives	Y	TCEQ guidance; The fugitives will be subject to Leak Detection and Repair (LDAR) under NSPS OOOOb, but to be conservative, no control efficiency is applied to the calculations.

ENGINE INFORMATION	YES	NO	COMMENTS
Was NOx/NAAQs compliance demonstrated?	X		Screen3
HCHO included in VOC total?	X		
Was a Catalyst Used?	X		Catalytic Oxidation

ESTIMATED EMISSIONS


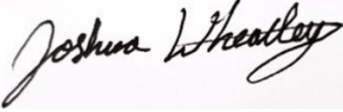
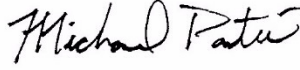
EPN / Emission Source	VOC*		NOx		CO		PM ₁₀		PM _{2.5}		SO ₂		HAP	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy

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Initial														
CS168-3 / CAT 3616 Compressor Engine 3	1.60	7.01	3.64	15.93	18.25	79.93	0.41	1.79	0.41	1.79	0.02	0.11	1.00	4.37
FUG / Fugitives	0.08	0.35	--	--	--	--	--	--	--	--	--	--	<0.01	<0.01
TOTAL EMISSIONS (TPY):		7.36		15.93		79.93		1.79		1.79		0.11		4.37
MAXIMUM OPERATING SCHEDULE:	Hours/Day				Days/Week			Weeks/Year				Hours/Year		8,760

*VOC totals include HAP emissions.

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
SIGNATURE:			
PRINTED NAME:	Ms. Camryn Appert	Joshua Wheatley, Team Leader	Michael Partee, Manager
DATE:	October 14, 2024	October 14, 2024	October 15, 2024