Air Pollution Control
Title V Permit to Operate
Statement of Basis for Permit No. V-SU-000048-2008.03
Minor Modification

Red Cedar Gathering Company
Trail Canyon Compressor Station
Southern Ute Indian Reservation
La Plata County, CO

Description of Permit Amendment

On December 8, 2011, EPA received a minor modification request from Red Cedar Gathering Company's (Red Cedar's) Trail Canyon Compressor Station to replace a Caterpillar 3516LE engine with a Waukesha 7042GL engine at the facility and to remove 40 CFR Part 63, Subpart ZZZZ (RICE MACT) requirements to modify the permit. Additionally, on February 16, 2012, EPA received an update to the minor modification request with a corrected serial number of the engine.

RICE MACT Applicability

40 CFR Part 63, Subpart ZZZZ: National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This rule establishes national emission limitations and operating limitations for HAPs emitted from stationary spark ignition internal combustion engines (SI ICE) and stationary compression ignition internal combustion engines (CI ICE).

For the purposes of this standard, construction or reconstruction is as defined in §63.2.

Summary of Applicability to Engines at Major HAP Sources

Table 1 – Applicability to Engines at Major HAP Sources

Major HAP Sources			
Engine Type	**Horse Power Rating**	**New or Existing?**	**Trigger Date**
SI ICE – All[1]	≥ 500 hp	New	On or After 12/19/2002
SI ICE – 4SRB	> 500 hp	Existing	Before 12/19/2002
SI ICE – All[1]	≤ 500 hp	New	On or After 6/12/2006
SI ICE - All[1]	≤ 500 hp	Existing	Before 6/12/2006
CI ICE - All[2]	≥ 500 hp	New	On or After 12/19/2002
CI ICE – Non Emergency	> 500 hp	Existing	Before 12/19/2002
CI ICE – All[2]	≤ 500 hp	New	On or After 6/12/2006
CI ICE – All[2]	≤ 500 hp	Existing	Before 6/12/2006

1. All includes emergency ICE, limited use ICE, ICE that burn landfill gas, 4SLB, 2SLB, and 4SRB.
2. All includes emergency ICE and limited use ICE

Applicability of 40 CFR 63, Subpart ZZZZ to the Trail Canyon Compressor Station

Red Cedar provided the following information:

Table 2 - NESHAP Subpart ZZZZ Applicability Determination
Red Cedar Trail Canyon Compressor Station

Unit	Serial Number	Unit Description	Fuel	BHP	Commenced Construction, Reconstruction, or Modification Date	Subpart ZZZZ Requirements
C-201	4EK02253	Caterpillar G3516LE / 4SLB	Natural Gas	1,045	Pre 12/19/2002	Not Subject (Existing)
C-202	4EK02752	Caterpillar G3516LE / 4SLB	Natural Gas	1,045	Pre 12/19/2002	Not Subject (Existing)
C-204	4EK04632	Caterpillar G3516LE / 4SLB	Natural Gas	1,286	Post 12/19/2002	Subject (New)
C-205	C-11322/1	Waukesha 7042GL 4SLB	Natural Gas	1,307	Pre 12/19/2002	Not Subject (Existing)

According to the information provided by Red Cedar, the Trail Canyon Compressor Station is a major HAP source. Engine units C-201 and C-202, and C-203 (now C-205) commenced construction before December 19, 2002 and are considered existing units. In addition, none of these units has undergone reconstruction (as defined in §63.2) or modification after December 19, 2002. Therefore, these units are not subject to the requirements of the RICE MACT.

However, unit C-204 commenced construction after December 19, 2002, and is considered a new unit; therefore, this unit is subject to the major source requirements of this subpart.

The following modifications have been made to this permit:

Section I.B. – Source Emission Points

- Updated emission unit ID, serial number, and description of engine unit C-203 (now C-205).

Section II. – Specific Requirements for Engines

- Remove 40 CFR Part 63, Subpart ZZZZ requirements for engine unit C-203 (now C-205) as the requirements no longer apply. The engine replacement is considered as an existing engine.

EPA is making this revision as a minor modification in accordance with 40 CFR 71.7(d). The permit will be reissued as permit number V-SU-000048-2008.03.

For specific applicability information regarding the Part 71 permit for this facility, please see the Statement of Basis for permit number V-SU-00048.2008.02.