

INSTRUCTIONS FOR COMPLETING THE TITLE-V SEMI-ANNUAL MONITORING REPORT

What is a Title-V Semi-Annual Monitoring Report?

A Title-V Semi-Annual Monitoring Report is a report that certifies that all required monitoring has been conducted and reported. The report should also include all instances of deviations from permit requirements, including emergencies. It is a reporting requirement of the Title-V State Operating Permit, issued by the New Mexico Environment Department Air Quality Bureau. The report must be submitted to NMED.

When do I need to submit a Title-V Semi-Annual Monitoring Report?

Submittal of a Title-V Semi-Annual Monitoring Report is required at least every six (6) months. The reports shall be submitted to the department within forty-five (45) days of the end of the reporting period, per NMAC 20.2.70.302.E(1). The six-month reporting periods start on the 1st of the month the first operating permit was issued, then continues every six months. For example, a permit is issued June 17, semi-annual reporting periods would then start on June 1st and December 1st each year. The reports would be due by January 14th (June 1-November 30 reporting period) and July 15th (December 1-May 31 reporting period) each year.

What do I need to submit?

Submittal requirements for the Title-V Semi-Annual Monitoring Report are outlined as follows:

Cover Page

The cover page for the Title-V Semi-Annual Monitoring Report is the Reporting Submittal Form. This is a multi-purpose form that is used as a cover page for all reports delivered to the Air Quality Bureau to satisfy permit conditions or regulatory requirements. It can be found on the Air Quality Bureau (Bureau) website at:

<https://www.env.nm.gov/air-quality/compliance-submittal-forms/>

Be sure to check *Section II* Box B of the Reporting Submittal Form when submitting Title-V Semi-Annual Monitoring Reports. If any of the information is missing, the report will be rejected.

Title-V Report Certification Form

This is a one-page form which is required for certification of all Title-V Semi-Annual and Annual Compliance reports submitted. The form consists of three sections which must be completed by the reporting party. It can be found on the Air Quality Bureau website at:

<https://www.env.nm.gov/air-quality/compliance-submittal-forms/>

Section I. Report Type – Select the type of report.

Section II. Identifying Information (facility, permit and Responsible Official) – Fill in all boxes with the required information. If any information is missing the report will be rejected.

Section III. Certification of Truth, Accuracy, and Completeness – The signature of the Responsible Official and date are required.

(Part 1) Monitoring Activity Reporting Requirements

This section requires the verification that all reporting requirements associated with the Title-V permit have been completed or are being reported in this monitoring report.

The first page is a general overview of reporting requirements and also contains the reporting period start dates for the Title-V Semi-Annual Monitoring Report. The next few pages include General Monitoring Requirements, General Recordkeeping Requirements and General Reporting Requirements.

The pages that follow include all reporting requirements which are identified in the permit and must be addressed. There may be two sections to this part depending on the facility. The first section is called FACILITY SPECIFIC REQUIREMENTS and the second section is called EQUIPMENT SPECIFIC REQUIREMENTS.

Each of these sections contain a box listing a permit condition, and identifies the requirement, monitoring, recordkeeping and reporting necessary for fulfilling that permit condition. Answer the question at the bottom of each box: “Has this reporting requirement been met during this reporting period with a separate report submittal?” If a report has been previously submitted during this reporting period check YES and include the date the report was submitted and the tracking number supplied by the Bureau after the submittal was received (e.g., SBR20140001). If not, check NO and provide comments regarding the reporting requirements. Include required supporting documentation as attachments.

(Part 2) Deviation Summary Report

This Part consists of two sections, each with a table. One section has Question 1 and is for deviations previously reported to the Bureau. The other section has Questions 2 and 3, and is for deviations not yet reported to the Bureau.

Question 1. Were any deviations reported to the Bureau during this reporting period? Answer “YES” or “NO”. If you answer “NO” you do not need to fill in the table. If you answer “YES” you must fill in the table “Summary of Deviations Previously Reported”.

The Summary of Deviations Previously Reported table consists of three columns. All three columns must be filled.

Column 1. Unit # and description – The reporting official must identify the Unit # as it appears in the permit and give a brief description of the unit.

Column 2. Date deviation reported – The reporting official must enter the date the deviation was reported.

Column 3. Tracking Number – The reporting official must enter the tracking number used by the Company. Note: With the implementation of the electronic emissions reporting system in 2013, tracking numbers for excess emissions will be automatically assigned by the reporting system.

Question 2. Are there any deviations not yet reported? If you answer “NO” you do not need to go on to the next question. If you answer “YES” go to Question 3 and list in the Deviation Summary Table each deviation not previously reported to the NMED.

Deviation Summary Table for deviations not yet reported.
Fill in the required information for each deviation identified in Question 2.

For all deviations answer the following:

Applicable Requirement from the permit or regulation, Emission Unit ID as identified in the permit, Cause of Deviation, Corrective Action Taken, Deviation Start Date and Time, Deviation End Date and Time, and Monitoring Method.

Question 3. Did any of the deviations not previously reported result in excess emissions? Answer “YES” or “NO”. If you answer “YES”, attach an excess emission reporting form for each deviation that resulted in excess emissions.

For deviations with excess emissions also include the following:

Pollutant, Amount of Emissions, and an answer to the question “Did you attach an excess emission form?”

Where can I get replacement forms?

Request for replacement forms shall be addressed to Compliance Reporting Manager at 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico 87505. Request shall include Permit number, Company and Facility name.

Who do I send the completed forms to?

The Title-V Semi-Annual Monitoring Report is sent to AQB at 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico 87505.

What if the Bureau has ruled my form incomplete or not approved it for other reasons?

If the document has been rejected, the submitter has failed to provide adequate information for the Bureau to process the Title-V Semi-Annual Monitoring Report. The Bureau will provide reasons for rejection and requirements for re-submittal with the notification by US Mail, email or fax.

Title V Semi - Annual Monitoring Report for Permit P

Part 1 – Monitoring Activity Reporting Requirements

A Semi-Annual Report of monitoring activities is due within 45 days following the end of every 6-month reporting period. The six month reporting periods start on March 1st and September 1st of each year. Use new address:

A responsible official (as defined in 20.2.70.7.AD NMAC) shall certify the accuracy, truth and completeness of every report and compliance certification submitted to the Department as required by this permit. These certifications shall be part of each document. (20.2.70.300.E NMAC)

Compliance Certification Reports, Semi-Annual monitoring reports, compliance schedule progress reports, and any other compliance status information required by this permit shall be certified by the responsible official and submitted to:

Manager, Compliance and Enforcement Section
New Mexico Environment Department
Air Quality Bureau
525 Camino de los Marquez Suite 1
Santa Fe, NM 87505-1816

Stack Test Protocols and Stack Test Reports shall be submitted electronically to Stacktest.AQB@state.nm.us or as directed by the Department.

Excess Emission Reports shall be submitted as directed by the Department. (20.2.7.110 NMAC)

B108 General Monitoring Requirements
(20.2.70. 302.A and C NMAC)

- A. These requirements do not supersede or relax requirements of federal regulations.
- B. The following monitoring and/or testing requirements shall be used to determine compliance with applicable requirements and emission limits. Any sampling, whether by portable analyzer or EPA reference method, that measures an emission rate over the applicable averaging period greater than an emission limit in this permit constitutes noncompliance with this permit. The Department may require, at its discretion, additional tests pursuant to EPA Reference Methods at any time, including when sampling by portable analyzer measures an emission rate greater than an emission limit in this permit; but such requirement shall not be construed as a determination that the sampling by portable analyzer does not establish noncompliance with this permit and shall not stay enforcement of such noncompliance based on the sampling by portable analyzer.
- C. If the emission unit is shutdown at the time when periodic monitoring is due to be accomplished, the permittee is not required to restart the unit for the sole purpose of performing the monitoring. Using electronic or written mail, the permittee shall notify the Department's Enforcement Section of a delay in emission tests prior to the deadline for accomplishing the tests. Upon recommencing operation, the permittee shall submit any pertinent pre-test notification requirements set forth in the current version of the Department's Standard Operating Procedures For Use Of Portable Analyzers in Performance Test, and shall accomplish the monitoring.
- D. The requirement for monitoring during any monitoring period is based on the percentage of time that the unit has operated. However, to invoke monitoring period exemptions at B108.D(2), hours of operation shall be monitored and recorded.
- (1) If the emission unit has operated for more than 25% of a monitoring period, then the permittee shall conduct monitoring during that period.
 - (2) If the emission unit has operated for 25% or less of a monitoring period then the monitoring is not required. After two successive periods without monitoring, the permittee shall conduct monitoring during the next period regardless of the time operated during that period, except that for any monitoring period in which a unit has operated for less than 10% of the monitoring period, the period will not be considered as one of the two successive periods.
 - (3) If invoking the monitoring period exemption in B108.D(2), the actual operating time of a unit shall not exceed the monitoring period required by this permit before the required monitoring is performed. For example, if the monitoring period is annual, the operating hours of the unit shall not exceed 8760 hours before monitoring is conducted. Regardless of the time that a unit actually operates, a minimum of one of each type of monitoring activity shall be conducted during the five year term of this permit.
- E. The permittee is not required to report a deviation for any monitoring or testing in a Specific Condition if the deviation was authorized in this General Condition B108.
- F. For all periodic monitoring events, except when a federal or state regulation is more stringent, three test runs shall be conducted at 90% or greater of the unit's capacity as stated in this permit, or in the permit application if not in the permit, and at additional loads when requested by the Department. If the 90% capacity cannot be achieved, the monitoring will be conducted at the maximum achievable load under prevailing operating conditions except when a federal or state regulation requires more restrictive test conditions. The load and the parameters used to calculate it shall be recorded to document operating conditions and shall be included with the monitoring report.

G. When requested by the Department, the permittee shall provide schedules of testing and monitoring activities. Compliance tests from previous NSR and Title V permits may be re-imposed if it is deemed necessary by the Department to determine whether the source is in compliance with applicable regulations or permit conditions.

H. If monitoring is new or is in addition to monitoring imposed by an existing applicable requirement, it shall become effective 120 days after the date of permit issuance. For emission units that have not commenced operation, the associated new or additional monitoring shall not apply until 120 days after the units commence operation. All pre-existing monitoring requirements incorporated in this permit shall continue to apply from the date of permit issuance. All monitoring periods, unless stated otherwise in the specific permit condition or federal requirement, shall commence at the beginning of the 12 month reporting period as defined at condition A109.B.

B109 General Recordkeeping Requirements
(20.2.70.302.D NMAC)

A. The permittee shall maintain records to assure and verify compliance with the terms and conditions of this permit and any applicable requirements that become effective during the term of this permit. The minimum information to be included in these records is (20.2.70.302.D.1 NMAC):

- (1) equipment identification (include make, model and serial number for all tested equipment and emission controls);
- (2) date(s) and time(s) of sampling or measurements;
- (3) date(s) analyses were performed;
- (4) the company or entity that performed the analyses;
- (5) analytical or test methods used;
- (6) results of analyses or tests; and
- (7) operating conditions existing at the time of sampling or measurement.

B. The permittee shall keep records of all monitoring data, equipment calibration, maintenance, and inspections, Data Acquisition and Handling System (DAHS) if used, reports, and other supporting information required by this permit for at least five (5) years from the time the data was gathered or the reports written. Each record shall clearly identify the emissions unit and/or monitoring equipment, and the date the data was gathered. (20.2.70.302.D.2 NMAC)

C. If the permittee has applied and received approval for an alternative operating scenario, then the permittee shall maintain a log at the facility, which documents, contemporaneously with any change from one operating scenario to another, the scenario under which the facility is operating. (20.2.70.302.A.3 NMAC)

D. The permittee shall keep a record describing off permit changes made at this source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. (20.2.70.302.I.2 NMAC)

E. Malfunction emissions and routine and predictable emissions during startup, shutdown, and scheduled maintenance (SSM):

- (1) The permittee shall keep records of all events subject to the plan to minimize emissions during routine or predictable SSM. (20.2.7.14.A NMAC)

(2) If the facility has allowable SSM emission limits in this permit, the permittee shall record all SSM events, including the date, the start time, the end time, and a description of the event. This record also shall include a copy of the manufacturer's, or equivalent, documentation showing that any maintenance qualified as scheduled. Scheduled maintenance is an activity that occurs at an established frequency pursuant to a written protocol published by the manufacturer or other reliable source. The authorization of allowable SSM emissions does not supersede any applicable federal or state standard. The most stringent requirement applies.

(3) If the facility has allowable malfunction emission limits in this permit, the permittee shall record all malfunction events to be applied against these limits, including the date, the start time, the end time, and a description of the event. **Malfunction** means any sudden, infrequent, and not reasonably preventable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner which causes, or has the potential to cause, the emission limitations in an applicable standard to be exceeded. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. (40 CFR 63.2, 20.2.7.7.E NMAC) The authorization of allowable malfunction emissions does not supersede any applicable federal or state standard. The most stringent requirement applies. This authorization only allows the permittee to avoid submitting reports under 20.2.7 NMAC for total annual emissions that are below the authorized malfunction emission limit.

B110 General Reporting Requirements
(20.2.70.302.E NMAC)

A. Reports of required monitoring activities for this facility shall be submitted to the Department on the schedule in section A109. Monitoring and recordkeeping requirements that are not required by a NSPS or MACT shall be maintained on-site or (for unmanned sites) at the nearest company office, and summarized in the semi-annual reports, unless alternative reporting requirements are specified in the equipment specific requirements section of this permit.

B. Reports shall clearly identify the subject equipment showing the emission unit ID number according to this operating permit. In addition, all instances of deviations from permit requirements, including those that occur during emergencies, shall be clearly identified in the reports required by section A109.
(20.2.70.302.E.1 NMAC)

C. The permittee shall submit reports of all deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. These reports shall be submitted as follows:

(1) Deviations resulting in excess emissions as defined in 20.2.7.7 NMAC (including those classified as emergencies as defined in section B114.A) shall be reported in accordance with the timelines specified by 20.2.7.110 NMAC and in the semi-annual reports required in section A109.
(20.2.70.302.E.2 NMAC)

(2) All other deviations shall be reported in the semi-annual reports required in section A109.
(20.2.70.302.E.2 NMAC).

D. The permittee shall submit reports of excess emissions in accordance with 20.2.7.110.A NMAC.

E. Results of emission tests and monitoring for each pollutant (except opacity) shall be reported in pounds per hour (unless otherwise specified) and tons per year. Opacity shall be reported in percent. The number of significant figures corresponding to the full accuracy inherent in the testing instrument or Method test used to obtain the data shall be used to calculate and report test results in accordance with 20.2.1.116.B and C NMAC. Upon request by the Department, CEMS and other tabular data shall be submitted in editable, MS Excel format.

F. At such time as new units are installed as authorized by the applicable NSR Permit, the permittee shall fulfill the notification requirements in the NSR permit.

G. Periodic Emissions Test Reporting: The permittee shall report semi-annually a summary of the test results.

H. The permittee shall submit an emissions inventory for this facility annually. The emissions inventory shall be submitted by the later of April 1 or within 90 days after the Department makes such request. (20.2.73 NMAC and 20.2.70.302.A.1 NMAC)

I. Emissions trading within a facility (20.2.70.302.H.2 NMAC)

(1) For each such change, the permittee shall provide written notification to the department and the administrator at least seven (7) days in advance of the proposed changes. Such notification shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of the permit.

(2) The permittee and department shall attach each such notice to their copy of the relevant permit.

FACILITY SPECIFIC REQUIREMENTS

A107 Facility: Allowable Startup, Shutdown, & Maintenance (SSM)

C. SSM and Malfunction Emissions

Requirement: The permittee shall perform a facility inlet gas analysis once every year and complete the following recordkeeping to demonstrate compliance with the routine and predictable startup, shutdown, and maintenance (SSM) and malfunction emission limits in Table 107.A.

Monitoring: The permittee shall monitor all SSM and malfunction events that result in VOC emissions including the identification of the equipment or activity that is the source of emissions.

Recordkeeping: The permittee shall record if the emissions are due to SSM and/or malfunction and a description of the equipment or activity that is the source of emissions. If emissions are due to a malfunction, the permittee shall indicate whether the emissions resulting from the event are included in the amount allowed by this permit or whether the event is reported under 20.2.7 NMAC.

To demonstrate compliance, each month records shall be kept of the cumulative total of VOC emissions during the first 12 months and, thereafter of the monthly rolling 12 month total of VOC emissions.

Records shall also be kept of the inlet gas analysis, the percent VOC of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the VOC emissions.

The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement to record the start and end times of SSM and malfunction events shall not apply to the venting of known quantities of VOC.

Reporting: The permittee shall report in accordance with Section B110.

Has this reporting requirement been met during this reporting period with a separate report submittal?
Answer Yes or No below.

Yes **Date report submitted:** _____ **Tracking Number:** _____

No **Provide comments and identify any supporting documentation as an attachment.**

Comments: There were no SSM or malfunction emissions during this reporting period that were vented and need to be submitted to the NMED. Emissions were purged to the flare (which is regulated by the NNEPA).

A112 Facility: 20.2.37 NMAC Opacity

A. 20.2.37 NMAC

Requirement: This facility is subject to 20.2.37 NMAC as a new natural gas processing facility. All combustion emission units are subject to the particulate matter emission limits in 20.2.37.202.A NMAC, Petroleum Processing Facilities. Particulate emissions due to the combustion of natural gas with sulfur content as specified by Condition A109.A constitutes compliance with the particulate matter emission limits required by this part.

Monitoring: As required in 20.2.37 NMAC.

Recordkeeping: The permittee shall keep records in accordance with Condition B109.

Reporting: The permittee shall report in accordance with Condition B110.

Has this reporting requirement been met during this reporting period with a separate report submittal?
Answer Yes or No below.

Yes **Date report submitted:** _____ **Tracking Number:** _____

No **Provide comments and identify any supporting documentation as an attachment.**

Comments: All fuel used during this reporting period complies with the sulfur content requirements contained in the tariff agreement included with this Title V Semi-Annual Monitoring Report as Attachment B.

EQUIPMENT SPECIFIC REQUIRMENTS:

<p>A201 Engines</p> <p>A. 40 CFR 63, Subpart ZZZZ (Units EG-1, FP-1 and FP-2)</p> <p>Requirement: The units are subject to 40 CFR 63, Subpart ZZZZ and the permittee shall comply with all applicable requirements of Subpart A and Subpart ZZZZ.</p> <p>Monitoring: The permittee shall comply with all applicable monitoring requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.</p> <p>Recordkeeping: The permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63, Subpart A and Subpart ZZZZ, including but not limited to 63.6655 and 63.10.</p> <p>Reporting: The permittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and ZZZZ, including but not limited to 63.6645, 63.6650, 63.9, and 63.10.</p>
<p>Has this reporting requirement been met during this reporting period with a separate report submittal? Answer Yes or No below.</p>
<p><input type="checkbox"/> Yes Date report submitted: _____ Tracking Number: _____</p>
<p><input checked="" type="checkbox"/> No Provide comments and identify any supporting documentation as an attachment.</p>
<p>Comments: A summary of engine run times is submitted with this Title V Semi Annual Monitoring Report as Attachment C, in accordance with the requirements of 40 CFR 63, Subpart ZZZZ.</p>