



September 25, 2024

Ms. Adrienne Sandoval
Air and Radiation Division Director
US EPA Region 8
1595 Wynkoop Street, MC 8ARD-PM
Denver, CO 80202
R8airpermitting@epa.gov

SENT VIA EMAIL. NO HARD COPY TO FOLLOW.

**Re: SIMCOE, LLC
Treating Site #7 Central Delivery Point
Permit PSD-SU0011-95.01
Request to Rescind PSD Permit**

Dear Director Sandoval:

SIMCOE LLC (SIMCOE) is submitting this letter to request the rescission of the Prevention of Significant Deterioration (PSD) permit for Treating Site #7. The site was originally a central delivery point which dehydrated and compressed gas. The site currently manages oily water from the field. Water is trucked to tanks, and the water and lube oil are separated. Water is then transferred for disposal, and oil is transferred for recycling and/or disposal.

Based on an analysis of uncontrolled potential to emit, the site is below the minor source permitting thresholds. The engines, Emission Unit IDs TS7-2, TS7-3, TS7-4, TS7-5, and TS7-6, and dehydrator were removed from the location in 2010. In addition, four tank heaters, Emission Unit IDs TS7-8, TS7-9, TS7-10, and TS7-11, have been removed. There are two insignificant emission units at the location from the original permit which are a tank heater (Emission Unit ID TS7-7) and fugitive emissions (Emission Unit ID TS7-12).

The other sources at the site are insignificant and include tank heaters, produced water tanks, and lube oil tanks.

Although all current emission sources at the site are insignificant, the location is required to have a Title V operating permit since it has a PSD permit. SIMCOE is requesting the rescission to reduce the administrative burden for both the permittee and permitter, the Southern Ute Indian Tribe Air Quality Program.

Copies of Table 1 and Table 2 from the existing Title V Permit and a copy of Table 3 from the existing Title V Statement of Basis are on the next page. Note the Title V Permit Number is V-SUIT-006-2019.01, and Southern Ute Indian Tribe Air Quality Program Inspectors conducted an onsite inspection on April 20, 2022 and confirmed the equipment at location.

Table 1 - Emission Units

Emission Unit ID	Description
TS7-2*	Waukesha F11-GSI Natural Gas-Fired Pump Engine 225 HP
TS7-3*	Waukesha F817-G Natural Gas-Fired Generator Engine 108 HP
TS7-4*, TS7-5*	Waukesha F2895-G Natural Gas-Fired Compressor Engine 421 HP
TS7-6*	Waukesha L5790-GSI Natural Gas-Fired Compressor Engine 1,215 HP

*Emission units TS7-2, TS7-3, TS7-4, TS7-5, and TS7-6 have been permanently removed from Treating Site #7 in 2010. However, these units remain listed in the Part 70 permit as they are still listed in the PSD permit PSD-SU0011-95.01.

Table 2 - Insignificant Emission Units

Emission Unit ID	Amount	Description	Size	Units
TS7-7, TS7-14→16	4	Tank Heaters	500	Mbtu/hr
TS7-12	N/A	Fugitive Emissions	N/A	N/A
N/A	1	Catalytic Space Heater	12	Mbtu/hr
N/A	1	Produced Water Tank	400	bbl
N/A	1	Gunbarrel (Oily Water Mix)	500	bbl
N/A	1	Sump Tank	95	bbl
N/A	2	Lube Oil Tank	400	bbl
TS7-8 → 10*	4	Tank Heater	500	Mbtu/hr
TS7-11*	1	Reboiler #2	600	Mbtu/hr

*Insignificant emission units TS7-8, TS7-9, TS7-10, and TS7-11 were permanently removed from Treating Site #7 in 2010. However, these units remain listed in the Part 70 permit as they are still listed in the PSD permit PSD-SU0011-95.01.

Table 3 - Potential to Emit

Emission Unit ID	Regulated Air Pollutants (tons per year)								
	NOx	VOC	SO ₂	PM ₁₀	CO	Lead	Total HAPs	Largest Single HAP (CH ₂ O)	GHGs (CO ₂ e tpy)
TS7-2*	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TS7-3*	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TS7-4*	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TS7-5*	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TS7-6*	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
IEUs	0.9	0.6	0.0	0.1	0.7	0.0	0.0	0.0	2,398.7
TOTAL	0.9	0.6	0.0	0.1	0.7	0.0	0.0	0.0	2,398.7

*Emission units TS7-2, TS7-3, TS7-4, TS7-5, and TS7-6 have been permanently removed from Treating Site #7 in 2010. However, these units remain listed in the Part 70 permit as they are still listed in the PSD permit PSD-SU0011-95.01.

Please contact Environmental Specialist Julie Best at (970) 822-8924 or julie.best@ikavenergy.com if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Tweedie', with a long horizontal stroke extending to the right.

Gavin Tweedie
Midstream Area Manager