



January 29, 2020

Mr. Mark Jones
Mr. Kerwin Singleton
NMED Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505

RE: Response to the Request for Additional Information for Four-Factor Analyses under the Regional Haze Program

Dear Mr. Jones and Mr. Singleton:

This letter addresses the additional information request for the IACX Roswell LLC – Bitter Lake Compressor Station Four-Factor Analysis report received on December 23, 2019. For the Bitter Lake Compressor Station (Bitter Lake) there were a total of three item requests pertaining to the NO_x emissions for both engines. Please see the responses for each item request below.

1. *Provide the details regarding Good Combustion Practices (GCP) and the routine maintenance schedule and procedures that are currently used to mitigate nitrogen oxide (NO_x) emissions that are employed as the base case.*

Response: Bitter Lake complies with the routine maintenance schedule pursuant to A201.A in TV Permit No. P047-R3. Bitter Lake complies with periodic testing pursuant to A201.B in order to monitor NO_x, CO, and VOC emissions. IACX operates the units per the manufacturer guidelines in order to mitigate NO_x emissions.

2. *Please provide an analysis of the technical feasibility of Non-Selective Catalytic Reduction (NSCR) as a retrofit control option for all engines that were evaluated in the Bitter Lake Compressor Station four-factor analysis for NO_x. Should it be determined that SCR is technically feasible, please complete a four-factor analysis for this technology.*

Response: U.S. EPA, Ap-42, Section 3.2 “Natural Gas-Fired Reciprocating Engines” currently states, “To achieve effective NO_x reduction performance, the engine may need to be run with a richer fuel adjustment than normal. This exhaust excess oxygen level would probably be closer to 1 percent. Lean-burn engines could not be retrofitted with NSCR control because of the reduced exhaust temperatures.” Also, in the report submitted on November 1, 2019, we included an RBLC table that further explains the infeasibility of NSCR on 2SLB engines.

3. *Please consider and include a discussion on the feasibility of replacing natural gas-fueled engines/turbines with commercial electric powered compressors.*

Response: Per Appendix Y to Part 51—Guidelines for BART Determinations Under the Regional Haze Rule Section IV.D.1.5, “We do not consider BART as a requirement to redesign the source when considering available control alternatives. For example, where the source subject to BART is a coal-fired electric generator, we do not require the BART analysis to consider building a natural gas-fired electric turbine although the turbine may be inherently less polluting on a per unit basis.” This report is essentially a BART analysis with only 4 factors which are reviewed. IACX will only submit alternative control options and will not assess replacing equipment.



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Please feel free to contact either myself at (505) 266-6611 or Tony Hines, Senior VP of Operations at IACX Roswell LLC at (972) 960-3219 if you have any questions regarding this response.

Sincerely,

MacKenzie Russell
Consultant

Cc: Tony Hines, IACX Roswell LLC