FEDERAL SYNTHETIC MINOR NEW SOURCE REVIEW PERMIT ISSUED PURSUANT TO THE REQUIREMENTS OF 40 CFR § 49.158

PERMITTING AUTHORITY	United States Environmental Protection Agency, Region 6				
PERMITEE:	Enterprise Field Services LLC 1100 Louisiana Street Houston, Texas 77002				
PERMIT NUMBER:	R6NSR-NM-005				
FACILITY:	Lindrith Compressor Station SIC 4922, NACIS 486210				
FACILITY LOCATION:	20 miles west of Lindrith 1.5 miles east of State Highway 403 Jicarilla Apache Reservation, Rio Arriba County, New Mexico Latitude 36.3105 N and Longitude 107.39639 W				
49.151- 49.161, the U.S. Environmental P. <i>Source Review Permit</i> for an existing, open Compressor Station (Lindrith). This perm	ean Air Act (CAA), 42 U.S.C. § 7410(a)(2)(C), and 40 CFR § Protection Agency, Region 6 is issuing a <i>Synthetic Minor New</i> erating source to Enterprise Field Services LLC, Lindrith it places practical enforceable restrictions on the potential to isions and requirements for major sources at 40 CFR § 52.21				
combustion engines, one emergency diese Enterprise is authorized to operate Lindrit conditions set forth in this permit. Failure may result in enforcement action pursuant	ource consisting of three natural gas-fired reciprocal internal el-fired engine, eight storage tanks and a loading station. In as a synthetic minor source in accordance with the terms and to comply with any term or condition set forth in this permit is to Section 113 of the CAA. The permit does not relieve be of the responsibility to comply with any other applicable tribal requirements.				
	his synthetic minor new source review permit becomes e of this final decision unless review is requested on the permit				
Guy Donaldson Associate Director for Air Multimedia Division	Date				

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I. PROJECT DESCRIPTION

The existing Lindrith Compressor Station (Lindrith) is located on Jicarilla Apache land in New Mexico. Enterprise Field Services LLC (Enterprise or Permittee) has requested that EPA rescind their current 1997 PSD permit and convert it to a synthetic minor new source review (NSR) permit. Enterprise has also has requested an amendment to the VOC emission limits to accommodate additional condensate product generated from the compressor station. The permit will not authorize any construction or physical modification to the current facility. The gathering system/pipeline from well production sites feeds Lindrith, where the gas is compressed from 60 psig to 220 psig and finally discharged to the transmission pipeline. The condensate generated at Lindrith is collected in eight storage tanks and loaded on to trucks which are taken offsite.

This synthetic minor NSR permit will limit the source's potential to emit (PTE) of each regulated air pollutant below the major source permitting threshold of 250 tpy for this source category [40 CFR 52.21]. As provided by 40 CFR § 49.151(c)(ii), this permit will include operational throughput limitations and the use of control devices on two reciprocal internal combustion engines (RICE).

II. EQUIPMENT LIST

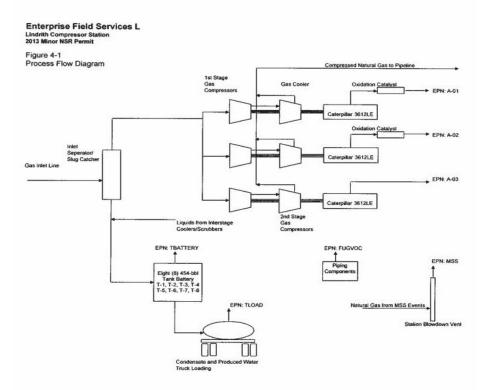
Table 1 and the process diagram indicates the equipment subject to 40 CFR § 49.158.

Table 1

	EPN	Construction date	Capacity	Content/Fuel	Serial No. or Manufacturer
4SLB RICE, with catalytic oxidation control	A-01	4-17-95	3267 HP 22.09MMBt u/hr	Natural gas	Caterpillar 36121E SN 1YG00055
4SLB RICE, with catalytic oxidation control	A-02	5-1-95	3267 HP 22.09 MMbtu/hr	Natural Gas	Caterpillar 36121E SN 1YG00050
4SLB RICE- No controls	A-03	5-15-95	3267 HP 22.09 MMBtu/hr	Natural gas	Caterpillar 36121E SN 1YG00064
Inlet Separator Pressurized- no emissions				Gathering line gas/condensate	
Emergency Generator engine	EMERGEN	5-1-95	192 HP 1.30 MMBtu/hr	Diesel fuel	Caterpillar -3304 SN 83Z03981
Condensate tanks	T1 to T8	circa 1995	454 bbl each	Condensate	Fixed Roof
Loading System	L-load	1995	60,000 bbls/yr	Condensate	No controls

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Lindrith Compressor Station Process Flow Diagram



III. REGULATORY APPLICABILITY

- 1. The compressor engines, EPN A-01 and A-02 will operate at all times with the catalytic oxidation control device. The three compressor engines are subject to 40 CFR § 63.6590(b)(3)(ii), and will meet all the Special Conditions of the permit in Section V.
- 2. The emergency generator EPN EMERGEN is subject to the 40 CFR Part 63, Subpart ZZZZ requirements for emergency generators 40 CFR § 63. 6002, Table 2c.
- 3. 40 CFR § 60.110(b)(d)(4) exempts vessels up to 10,000 bbl volume that are used for condensate storage prior to custody transfer.
- 4. Existing emission sources, not specifically identified within this permit, are authorized to continue to operate as demonstrated in the permit application. These emission sources are subject to applicable federal standards and are considered insignificant emission units for purposes of this permit. The volume of the tanks, VOC content of the product in the tanks and flow rates are below the thresholds of any applicable tank regulations, and are considered insignificant emission units. These tanks/units are listed in Appendix A.

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IV. GENERAL CONDITIONS

- 1. This permit and any required attachments shall be retained and made available for inspection upon request at the site.
- 2. All representations, statements of intent, and agreements contained in the application and other materials submitted by the Permittee shall be enforceable. The EPA shall be notified ten (10) days in advance of any significant deviation from the permit application as well as any plans, specifications or supporting data furnished.
- 3. The Permittee shall comply with all conditions of this permit, including emission limitations that apply to the affected emissions units at the permitted source. Noncompliance with any permit term or condition is a violation of the permit and may constitute a violation of the CAA and is grounds for an enforcement action and for a permit termination or revocation [40 CFR § 49.157(a)(7)(i)].
- 4. Emissions from the permitted source shall not cause or contribute to a National Ambient Air Quality Standard (NAAQS) violation or cause or contribute to a Prevention of Significant Deterioration (PSD) increment violation [40 CFR § 49.155(a)(7)(ii)].
- 5. Issuance of this permit does not relieve the Permittee, the owner, and/or the operator of the responsibility to comply fully with all other applicable Federal and Tribal rules, regulations, and orders now or hereafter in effect.
- 6. The issuance of this permit does not provide relief for any federal applicable regulations that the facility may have been subject to including 40 CFR Part 49, 40 CFR Part 52, 40 CFR Part 60, 40 CFR Part 63, or 40 CFR Part 71, prior to issuance of this permit
- 7. It is not a defense for the Permittee, in an enforcement action, to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 8. For proposed modifications, as defined at 40 CFR § 49.152(d), that would increase an emissions unit's allowable emissions of a regulated NSR pollutant above its existing permitted annual allowable emissions limit, the Permittee shall first obtain a permit modification pursuant to 40 CFR §§ 49.154 and 49.155 approving the emission increase. For a proposed modification that is not otherwise subject to review under major NSR or minor NSR, such proposed increase in the annual allowable emissions limit shall be approved through an administrative permit revision as provided at 40 CFR § 49.159(f)(1)(v).
- 9. At such time that a new or modified source at the permitted facility or modification of the permitted facility becomes a major stationary source or major modification solely by virtue of a relaxation in any legally and practically enforceable limitation which was established after August 7, 1980, on the capacity of the permitted facility otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of 40 CFR § 52.21 shall apply to the

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source or modification as though construction had not yet commenced on the source or modification.

- 10. Revise, Reopen, Revoke and Reissue, or Terminate for Cause: The permit may be revised, reopened, revoked and reissued or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and re-issuance or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [40 CFR § 49.155(a)(7)(iv)]. The EPA may reopen a permit for a cause on its own initiative, e.g., if the permit contains a material mistake or the facility fails to assure compliance with the applicable requirements.
- 11. Severability Clause: The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.
- 12. *Property Rights:* The permit does not convey any property rights of any sort or any exclusive privilege.
- 13. *Information Requests:* The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. For any such information claimed to be confidential, the Permittee shall also submit a claim of confidentiality in accordance with 40 CFR Part 2, Subpart B.
- 14. *Inspection and Entry:* The EPA or its authorized representatives may inspect the permitted facility during normal business hours for the purpose of ascertaining compliance with all conditions of this permit. Upon presentation of proper credentials, the Permittee shall allow the EPA or its authorized representative to:
 - **a.** Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
 - **b.** Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
 - c. Inspect, during normal business hours or while the source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under the permit;
 - **d.** Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements; and
 - e. Record any inspection by use of written, electronic, magnetic and photographic media.
- 15. Effective Date: This permit is effective immediately upon issuance unless comments resulted in a change in the draft permit, in which case the permit is effective 30 days after issuance. The Permittee may notify the EPA, in writing, that this permit or a term or condition of it is rejected. Such notice should be made within thirty days of receipt of the permit and should include the reason or reasons for rejection.

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16. *Permit Transfers:* Permit transfers shall be made in accordance with 40 CFR § 49.159(f). The Air Program Associate Director shall be notified in writing/electronically at the address shown below if the company is sold or changes its name.

U.S. Environmental Protection Agency Region 6 Air Permitting, Multimedia Division Tribal Air Permitting, 6MM-AP 1445 Ross Ave, Dallas TX 75202 R6AirPermits@epa.gov

V. SPECIAL CONDITIONS

1. The permittee shall comply with the emission limitations (in tons per year) identified in Table 2.

Table 2

Emission Unit Description	EPN ¹	NO _x	voc	SO ₂	PM_{10}	PM _{2.5}	CO	HAP ²
Caterpillar 3612LE (NG-fired Engine) with catalytic control.	A-01	22.09	20.54	1.42	0.97	0.97	11.83	10.28
Caterpillar 3612LE (NG-fired Engine) with catalytic control	A-02	22.09	20.54	1.42	0.97	0.97	11.83	10.28
Caterpillar 3612LE (NG-fired Engine)	A-03	22.09	29.34	1.42	0.97	0.97	78.88	14.69
Emergency Generator Caterpillar 3304 (Diesel-fired engine) ³	EMERGEN	0.02	0.01	<.001	0.002	0.002	0.03	
Maintenance, startup and shutdown for the facility ⁵	MSS		30.00					0.64
Fugitives for facility ⁴	FUGVOC		3.31					0.03
Condensate Tanks T1-T8	TBATTERY		102.63					1.32
Loading System at 60,000 bbls/yr	TLOAD		4.98					0.07
TOTALS in tpy		66.29	211.34	4.26	2.91	2.91	102.57	37.31

Notes for table 2.

- 1. Emission Point Number
- 2. HAP emissions are primarily formaldehyde emissions
- 3. The emission calculations are based on 50 hrs/yr for maintenance and testing purposes only.
- 4. Fugitive emissions are estimated and not required to be monitored and are not enforceable.
- 5. MSS emissions include, but are not limited to compressor shutdowns, vessel and piping blowdowns, pigging activities.

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- 2. The fuel for the compressor engines (EPNs A-01, A-02, and A-03) shall be field natural (field) gas. The quantity of field gas to *each* compressor engine (A-01, A-02, and A-03) shall be calculated using the run time meters for each compressor and the total field gas flow meter to the compressors. The flow shall not exceed 213.83 MMSCF/yr, for each engine based on a 12-month rolling average.
- 3. Field gas is limited to ≤ 0.25 grains of hydrogen sulfide per 100 dry standard cubic feet and is required to be analyzed every 12 months to determine Btu content.
- 4. All meters used to provide data to determine compliance with the permit limits shall be calibrated annually and may use the procedures specified by the instrument meter manufacturer, or a method published by a consensus-based standards organization such as ASTM or API, or AGA.
- 5. Samples of the condensate to TBATTERY should be analyzed on an annual basis to determine the molecular weight, vapor pressure and temperature, using standard industrial methods. The analyses should not be performed more than 365 days apart.
- 6. For each engine and its respective catalytic control system, the Permittee shall follow the manufacturer recommended maintenance schedule and procedures or equivalent maintenance schedule and procedures developed by the Permittee or vendor to ensure optimum performance of each engine and its respective catalytic control system. See Appendix B.
- 7. The engine exhaust temperature for the two compressor engines [EPN A-01 and EPNA-02] shall be monitored at the inlet of the oxidation catalyst system and be always maintained between the minimum and maximum parameters as in the warranty representation of the catalyst manufacturer. If the engines operate outside the parameters corrective action as stated in Special Condition V.9 should be taken.
- 8. Continuous catalyst performance shall also be demonstrated by the pressure drop and temperature differential across the catalyst and shall not exceed the recommendation from the catalyst manufacturer or plus 10% from the baseline pressure drop across the catalyst measured during the initial performance test. If the pressure drop exceeds the limits stated above, corrective action (Special Condition V.9) should be taken immediately. See Appendix B for representative catalyst monitoring.
- 9. Upon determining a deviation from the monitoring as stated above in Special Conditions 6,7, and 8, corrective action shall be taken to assess the performance problems of the oxidation catalyst. If immediate remedy is not possible, then the affected engine shall cease operating within 24 hours and shall not be returned to routine service until the deviation is resolved. EPA will be notified of the problem as noted in Section VIII.
- 10. The short term limit for these engines are in the Table 3 below and are verified using the CO analyzer as required in Special Condition V.11.

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Table 3

Unit ID	Load	NOx		СО		VOC	
	%	g/hp-hr	lbs/hr	g/hp-hr	lbs/hr	g/hp-hr	lbs/hr
A-01	100	0.70	5.04	0.38	2.70	0.65	4.69
A-02	100	0.70	5.04	0.38	2.70	0.65	4.69
A-03	100	0.70	5.04	2.50	18.01	0.93	6.70

- 11. The CO emission limits in Table 3 shall be monitored by a calibrated portable CO emission analyzer on a quarterly basis. The portable analyzer and monitoring shall be conducted in accordance with the requirements of the current version of ASTM D 6522. If the CO emissions exceed the limit in Table 3, corrective action noted in Special Condition V.9 shall be taken.
- 12. Diesel fuel in the emergency generator is limited to 15 ppm, sulfur content. Operations of the generator when tested or used should be recorded and monitored using the non-resettable meter.
- 13. There shall be no visible emissions during the startup and testing of the emergency generator engine, except for an initial two-minute interval.
- 14. There is no time limit on the use of emergency stationary RICE in emergency situations.
- 15. EMERGEN may be operated for periods where there is a deviation of voltage or frequency of 5% or greater below standard voltage or frequency.
- 16. For testing and readiness purposes, EMERGEN shall not be operated more than 50 hours per calendar year [40 CFR § 63.6640(f)].
- 17. EMERGEN shall not be used for peak shaving or non-emergency demand response, or to generate income from supplying power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- 18. For EMERGEN the maintenance shall be performed in accordance with 40 CFR § 63.6002, Table 2c.
- 19. Condensate flow to inlet shall be determined by the truck loading tickets and shall not exceed 60,000 bbls/yr based on a 12 -month rolling average. This flow shall be used to calculate the emissions from TBATTERY tanks.
- 20. Loading emissions shall be calculated on a 12-month rolling basis using truck loading tickets and not exceed 60,000 bbls/yr.

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21. The tanks shall be maintained for integrity and the tank and loading operations shall be conducted without any spills or visible emissions.

VI. COMPLIANCE TESTS:

- 1. An initial test to determine the emissions from the compressor engines, the efficiency of the oxidation catalyst system shall be conducted within 180 days of the issuance of this permit. Thirty (30) days prior to the emission tests, a test plan shall be sent to EPA Region 6 Compliance Assurance and Enforcement Division for review at: R6TribalNSRCompliance@epa.gov
- 2. At a minimum, the test plan should provide the following details:
 - **a.** Purpose of the test (initial, periodic, catalyst replacement etc.);
 - **b.** The proposed date, time and name of person that will be performing the test;
 - c. Engines and catalytic control systems to be tested;
 - **d.** Tests to be conducted at maximum capacity, 75% and 50% capacity of each engine, to confirm the emission factors for the pollutants. If the maximum capacity cannot be achieved, the testing will be conducted at the maximum achievable load under prevailing operating conditions. However, additional testing may be required should the engines operate at higher than + 10% of the maximum tested load;
 - **e.** Sampling and analysis procedures to include sampling locations, test methods and laboratory identification:
 - **f.** Quality assurance plan which includes calibration procedures and frequency, sample recovery and field documentation, chain of custody procedures; and
 - **g.** Data processing and reporting with the description of data handling and quality control procedures in the final report.
- 3. Each test shall consist of at least three 1-hour or longer valid test runs. Emission results shall be reported as the arithmetic average of all valid test runs and shall be in terms of the emission limits in this permit.
- 4. The tests shall meet the minimum specification requirements for the catalyst.
- 5. For the initial test, the condensate shall be sampled and analyzed to determine the vapor pressure in psia, components of the condensate, temperature and molecular weight. This data shall be used in the calculation methodology for the tanks and loading emissions to determine compliance with the emission limits in Table 2.
- 6. The result of the tests shall be submitted to EPA within sixty (60) days of completion of the tests.
- 7. Periodic compliance tests may be required upon a request from the EPA.

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VII. RECORDKEEPING AND MONITORING REQUIREMENTS

- 1. The permittee shall keep records of all monitoring data, equipment calibration, maintenance, 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.
- 2. Monitor and maintain records on the duration of the operation of EMERGEN to include readiness tests.
- 3. Monitor and record the field natural gas flow rate to each compressor engine and keep records of the flow to each unit on a 12-month rolling average.
- 4. Calculate and record the MMBtu/hr to each engine based on the flow and analyses of the field gas to the units.
- 5. Record the type of maintenance operations of the compressor engines, catalytic oxidation system, tanks and other pieces of equipment to include the time and date for such an event.
- 6. Monitor and keep records/logs on the performance of the catalyst oxidation system as in Section V, conditions 7, 8 and 10. The records of the maintenance and operation of the catalyst oxidation system of the catalyst manufacturer should be kept on site and be readily available when requested.
- 7. Monitor the flow of condensate to the TBATTERY using the truck loading tickets on a monthly basis and record total throughput based on a 12-month rolling basis.
- 8. Monitor the volume of condensate to TLOAD on a monthly basis using the truck loading tickets, and record totals based on a 12-month rolling basis.
- 9. Document daily the number of pipeline pigging events to the pipeline pig receiver for MSS emissions and total the daily record for the month. Records shall be kept of the monthly total volume of gas vented during SSM events in MMSCF and of the annual inlet gas analysis specifying the percent VOC. The calculated monthly total shall be used to calculate the monthly rolling 12-month total VOC emissions
- 10. The permittee shall keep records of the serial numbers for each emission unit listed herein. The emission units and their serial numbers are: A-01 with serial number 1YG00055; A-02 with serial number 1YG00050; A-03 with serial number 1YG00064; and EMERGEN with a serial number 83Z09381. A change in serial number should also be reflected in the report required by Section VIII-2 below.

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VIII. REPORTING REQUIREMENTS

The following reports should be sent electronically to EPA Region 6 Compliance Assurance and Enforcement Division at: R6TribalNSRCompliance@epa.gov, and a copy to R6AirPermits@epa.gov

- 1. The Permittee shall promptly submit to the EPA a written report of any deviations of emission or operational limits and a description of any corrective actions or preventative measures taken. A "prompt" deviation report is one that is emailed to R6TribalNSRCompliance@epa.gov within the time period below:
 - a. Thirty (30) days from the discovery of a deviation that would cause the Permittee to exceed the facility-wide emission limits if left uncorrected for more than five (5) days after discovering the deviation; and
 - b. Twelve (12) months from the discovery of a deviation of recordkeeping or other permit conditions that do not affect the permittee's ability to meet the facility-wide emission limits.
- 2. Reports for the replacement and/or repairs of the compressor engines, and use of EMERGEN for emergency purposes.
- 3. Annual emission reports on the volumes of condensate to the tanks, based on the annual condensate sampling analyses (Section V.5) Emissions shall be calculated using the AP-42 method or any other standard applicable to this facility's operation.
- 4. An annual report documenting the twelve (12) month annual emissions for each previous calendar year no later than April 1st is to be submitted to EPA to the electronic addresses as indicated above. For the first calendar year, the Permittee shall submit the cumulative facility wide limits. The report shall also document that no operational restriction established in the special conditions section of this permit has been exceeded.
- 5. The Permittee shall submit any record or report required by this permit upon EPA request.

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Table of Acronyms

AGA	American Gas Association					
API	American Petroleum Institute					
ASTM	American Society for Testing and Materials					
4SLB	4 Stroke Lean Burn					
CT	Control Technology					
bhp /HP	Brake Horse Power					
Btu/hr	British Thermal Units per Hour					
bbl	Barrels					
CFR	Code of Federal Register					
CH ₄	Methane					
CAA	Clean Air Act					
CO	Carbon Monoxide					
dscf	Dry Standard Cubic Feet					
FIP	Federal Implementation Plan					
FR	Federal Register					
HHV	High Heating Value					
HAP	Hazardous Air Pollutants					
hr	Hour					
kW	Kilowatt					
lb	Pound(s)					
lb/yr	Pounds per year					
MACT	Maximum Achievable Control Technology					
MMBtu/hr	Million British Thermal Units per hour					
MMSCF	Million Standard Cubic Feet					
NESHAP	National Emission Standards for Hazardous Air					
	Pollutants					
NSPS	New Source Performance Standard					
NOx	Oxides of Nitrogen					
NSR	New Source Review					
PTE	Potential to Emit					
RICE	Reciprocating Internal Combustion Engine					
tpy	Tons per year					
VOC	Volatile Organic Compounds					
%	Percent					

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APPENDIX A

INSIGNIFICANT EMISSION UNITS

Three-300 gallons Lube Oil Tank One-500 gallons Lube Oil Tank One 120 bbl below ground Waste Oil Tank One 250 bbl Methanol Tank One 100 bbl Methanol Tank



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Appendix B

Typical Oxidation Catalyst Maintenance

6.0 MAINTENANCE

DCL's recommended monitoring and maintenance schedule during operation is given below. Due to large variations in operating conditions, the schedule may change depending on the specifics of the application. In addition to this schedule, additional monitoring and reporting may be needed according to the requirements of your environment permit.

It is recommended that a maintenance log be maintained. Measurements and records of temperature difference (ΔT) and pressure difference (ΔP) should always be made under the same operating conditions (e.g. engine load, speed, ignition timing and exhaust oxygen concentration).

Monitoring and Maintenance Schedule

Item No.	Description	> 4000 hours operation per year	500 – 3999 hours operation per year	< 500 hours operation per year	Directions
1	Check back-pressure (ΔP)	At time of installationEvery 3 months	At time of installationEvery 6 months	At time of installationEvery year	If the (ΔP) is more than 55 mm H ₂ O (2" H ₂ O) higher than the initial (ΔP) , inspect catalyst for excessive ash buildup. See Section 7 (Troubleshooting).
2	Check temperature change (ΔT)	At time of installationEvery 3 months	At time of installationEvery 6 months	At time of installation Every year	If the (ΔT) is more than $25\Delta F$ $(14\Delta C)$ higher than the initial (ΔT) , check the engine for misfiring and /or inspect catalyst element for damage or fouling. See Section 7 (Troubleshooting).
3	Conduct emissions test	• As required by operating permit	As required by operating permit	As required by operating permit	As required by operating permit.
4	Visual inspection of catalyst element	• Every 2 years	• Every 3 years	• Every 3 years	See Section 7 (Troubleshooting).
5	Chemical cleaning of catalyst element	• Every 2 years	• Every 3 years	• N/A	Contact DCL or authorized dealer for assistance.

Note: Items 1, 2 and 3 can be conducted by utilizing the ports on the inlet and outlet side of the converter.