October 10, 2019

Ted Schooley
Permit Programs Manager
New Mexico Environment Department Air Quality Bureau
525 Camino de los Marquez, Suite 1
Santa Fe, New Mexico, 87505-1816

Re: Application to Modify Title V Operating Permit P195-R3

Harvest Four Corners, LLC – 32-7 Central Delivery Point (CDP), A.I. No. 1221

Dear Mr. Schooley,

The Harvest Four Corners, LLC (Harvest) 32-7 Central Delivery Point (CDP) is authorized under Title V Operating Permit P195-R3, issued by the New Mexico Environment Department Air Quality Bureau (NMAQB) on January 31, 2018.

On October 11, 2018, the NMAQB issued construction permit 1032-M9 for the 32-7 CDP, which authorized the removal of an insignificant produced water storage tank (unit T-4) concurrent with the addition of two 300-barrel (bbl) produced water storage tanks (units T-38 and T-39) and one 500-bbl produced water storage tank (unit T-40).

Following the issuance of construction permit 1032-M9 the facility underwent a change in ownership, from Williams Four Corners LLC to its new owner, Harvest Four Corners, LLC (Harvest).

For Title V purposes, the facility is considered to have "commenced operation" on the date of issuance of the modified construction permit (October 11, 2018). Under 20.2.70.404.C(3)(b) of the New Mexico Administrative Code (NMAC), a complete application to modify the Operating Permit must be filed within 12 months of commencing operation under a revised [New Source Review (NSR)] construction permit (i.e., permit 1032-M9). Therefore, Harvest is submitting this application to modify its Title V Operating Permit.

In accordance with the instructions in the NMAQB Universal Air Quality Permit Application, one hard copy original and one hard copy review copy are included. CDs containing the application electronic files are included with each hard copy.

Tel: (505) 466-1790

Fax: (505) 466-4599

lkillion@cirrusllc.com

If any additional information is needed with regard to this application, please contact Ms. Monica Smith of Harvest at (505) 632-4625.

Sincerely,

Lisa Killion

Sr. Environmental Scientist

Enclosures – One application original hard copy, with electronic files on CD

One application review hard copy, with electronic files on CD

cc: Monica Smith, Harvest (electronic copy)

Bobby Myers, Cirrus (electronic copy)

# NEW MEXICO 20.2.70.404.C NMAC APPLICATION TO MODIFY TITLE V OPERATING PERMIT P195-R3

# 32-7 CENTRAL DELIVERY POINT (CDP)

# **Submitted By:**



# Harvest Four Corners, LLC

1755 Arroyo Drive Bloomfield, New Mexico 87413

**Prepared By:** 

Cirrus Consulting, LLC 951 Diestel Road Salt Lake City, Utah 84105 (801) 484-4412

October 2019

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Harvest Four Corners LLC 32-7 CDP Oct. 2019; Rev.0

### **Mail Application To:**

New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505

Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb



For Department use only:

AIRS No.:

# **Universal Air Quality Permit Application**

Use this application for NOI, NSR, or Title V sources.

Use this application for: the initial application, modifications, technical revisions, and renewals. For technical revisions, complete Sections, 1-A, 1-B, 2-E, 3, 9 and any other sections that are relevant to the requested action; coordination with the Air Quality Bureau permit staff prior to submittal is encouraged to clarify submittal requirements and to determine if more or less than these sections of the application are needed. Use this application for streamline permits as well. See Section 1-I for submittal instructions for other permits.

This application is submitted as (check all that apply):   Request for a No Permit Required Determination (no fee)
☐ <b>Updating</b> an application currently under NMED review. Include this page and all pages that are being updated (no fee required).
Construction Status: $\square$ Not Constructed $\square$ Existing Permitted (or NOI) Facility $\square$ Existing Non-permitted (or NOI) Facility
Minor Source: $\Box$ a NOI 20.2.73 NMAC $\Box$ 20.2.72 NMAC application or revision $\Box$ 20.2.72.300 NMAC Streamline application
Title V Source: ☐ Title V (new) ☐ Title V renewal ☐ TV minor mod. 🛽 TV significant mod. TV Acid Rain: ☐ New ☐ Renewal
PSD Major Source: ☐ PSD major source (new) ☐ minor modification to a PSD source ☐ a PSD major modification
Acknowledgements:
I acknowledge that a pre-application meeting is available to me upon request. It Title V Operating, Title IV Acid Rain, and NPR
applications have no fees.
□ \$500 NSR application Filing Fee enclosed OR □ The full permit fee associated with 10 fee points (required w/ streamline
applications).
Check No.: in the amount of
I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched
(except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.
☐ This facility qualifies to receive assistance from the Small Business Environmental Assistance program (SBEAP) and qualifies for
50% of the normal application and permit fees. Enclosed is a check for 50% of the normal application fee which will be verified with
the Small Business Certification Form for your company.
☐ This facility qualifies to receive assistance from the Small Business Environmental Assistance Program (SBEAP) but does not
qualify for 50% of the normal application and permit fees. To see if you qualify for SBEAP assistance and for the small business
certification form go to https://www.env.nm.gov/aqb/sbap/small_business_criteria.html ).
Citation: Please provide the low level citation under which this application is being submitted: 20.2.70.404.C(3)(b) NMAC
(e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is
20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

# **Section 1 - Facility Information**

		AI # if known (see 1 <sup>st</sup>	Updating	
~		3 to 5 #s of permit	Permit/NOI #:	
Sec	tion 1-A: Company Information	IDEA ID No.): <b>1221</b>	P195-R3-M1	
1	Facility Name: 32-7 Central Delivery Point (CDP	Plant primary SIC Code	e (4 digits): 1389	
1	32 / Central Benvery Folia (CB)	Plant NAIC code (6 digits): 213112		
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): From Aztec, drive north on Hwy 550 to Colorado 318. Turn right and drive to a "T" junction at Colorado 172 (Approx. 15 miles). Turn left, drive into Ignacio, and turn right on 151 to mile marker 11.9. Turn right on 330. Drive 1.9 miles to the NM line, turn right on 4020. Drive 5.1 miles to the "Y" and turn right. Drive 2.1 miles & turn left. The site is 0.3 miles on right.			
2	Plant Operator Company Name: Harvest Four Corners, LLC	Phone/Fax: 505-632-4	600 / 505-632-4782	

a	Plant Operator Addre	ess:	1755 Arroyo Drive, Bloomfield, N	M 87413	
b	Plant Operator's New	Mexico Corpo	rate ID or Tax ID: 76-0451075		
3	Plant Owner(s) name	e(s):	Harvest Four Corners, LLC	Phone/Fax:	505-632-4600 / 505-632-4782
a	Plant Owner(s) Maili	ng Address(s):	1755 Arroyo Drive, Bloomfield Ni	M 87413	
4	Bill To (Company): Harvest Four Corners, LLC			Phone/Fax:	505-632-4600 / 505-632-4782
a	Mailing Address: 1755 Arroyo Drive, Bloomfield NM 87413			E-mail: N/A	Λ
5	□ Preparer:			Phone/Fax:	801-484-4412 / 801-484-4192
a	Mailing Address: 951 S. Diestel Road, Salt Lake City, UT 84105			E-mail:	bmyers@cirrusllc.com
6	Plant Operator Conta	ct: Monica Sm	nith	Phone/Fax:	505-632-4625 / 505-632-4782
a	Address:	1755 Arroyo l	Drive, Bloomfield NM 87413	E-mail:	msmith@harvestmidstream.com
7	Air Permit Contact:	Monica Smith		Title:	Environmental Specialist
a	E-mail: msmith@harvestmidstream.com			Phone/Fax:	505-632-4625 / 505-632-4782
b	Mailing Address: 1755 Arroyo Drive, Bloomfield NM 87413				
c	The designated Air p	ermit Contact w	rill receive all official correspondence	e (i.e. letters, p	ermits) from the Air Quality Bureau.

**Section 1-B: Current Facility Status** 

	tion 1 B: Current racinty Status			
1.a	Has this facility already been constructed? ▼ Yes □ No	1.b If yes to question 1.a, is it currently operating in New Mexico?		
2	If yes to question 1.a, was the existing facility subject to a Notice of Intent (NOI) (20.2.73 NMAC) before submittal of this application?  ☐ Yes ☒ No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application?  ☐ Yes ☐ No		
3	Is the facility currently shut down? ☐ Yes ☒ No	If yes, give month and year of shut down (MM/YY):		
4	Was this facility constructed before 8/31/1972 and continuously operated s	since 1972? <b>X</b> Yes □ No		
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972?  □Yes □No ☒ N/A			
6	Does this facility have a Title V operating permit (20.2.70 NMAC)?   X Yes □ No	If yes, the permit No. is: P-195-R3-M1		
7	Has this facility been issued a No Permit Required (NPR)?  ☐ Yes X No	If yes, the NPR No. is:		
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes 🗓 No	If yes, the NOI No. is:		
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)?   X Yes □ No	If yes, the permit No. is: 1032-M9-R1		
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)?  ☐ Yes ☒ No	If yes, the register No. is:		

**Section 1-C: Facility Input Capacity & Production Rate** 

1	What is the	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)					
a	Current	Hourly:	6.6 mmcfh <sup>(a)</sup>	Daily:	157.2 mmcfd <sup>(a)</sup>	Annually:	57,380 mmcfy <sup>(a)</sup>
b	Proposed	Hourly:	6.6 mmcfh <sup>(a)</sup>	Daily:	157.2 mmcfd <sup>(a)</sup>	Annually:	57,380 mmcfy <sup>(a)</sup>
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)						

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a	Current	Hourly:	6.6 mmcfh <sup>(a)</sup>	Daily:	157.2 mmcfd <sup>(a)</sup>	Annually:	57,380 mmcfy <sup>(a)</sup>
b	Proposed	Hourly:	6.6 mmcfh <sup>(a)</sup>	Daily:	157.2 mmcfd <sup>(a)</sup>	Annually:	57,380 mmcfy <sup>(a)</sup>

<sup>(</sup>a) Station capacity is a direct function of available horsepower. The throughput is therefore dependent on atmospheric temperature, gas temperature, atmospheric pressure, gas pressure, relative humidity and gas quality, as well as other factors. The "capacity" expressed in the application is a nominal quantity, neither an absolute maximum nor an average. The actual throughput will vary from the nominal amount.

**Section 1-D: Facility Location Information** 

~ • • • •			••••••••••			
1	Section: 34	Range: 07W	Township: 32N	County: San Juan		Elevation (ft): 6,740
2	UTM Zone:	x 12 or □ 13		Datum: □ NAD 27	X NAD 8	33 □ WGS 84
a	UTM E (in meter	rs, to nearest 10 meters	s): 271,970 m	UTM N (in meters, to nearest	t 10 meters):	4,090,325 m
b	AND Latitude	(deg., min., sec.):	36° 55' 53"	Longitude (deg., min., se	c.):	-107° 33' 37"
3	Name and zip o	code of nearest Ne	ew Mexico town: Navajo	Dam, NM 87419		
4	Detailed Drivin	ng Instructions fro	om nearest NM town (attacl	h a road map if necessary):	See Secti	on 1-A.1.a.
5	The facility is ~	~9 (distance) mile	s north-northeast (direction	n) of Navajo Dam, NM (ne	arest town)	
6	Status of land a	at facility (check o	one): 🛚 Private 🗆 Indian/Pu	ueblo □ Federal BLM □ F	ederal For	est Service   Other (specify)
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: None; So. Ute Tribe; San Juan Co. & Rio Arriba Co., NM					
8	20.2.72 NMAC applications only: Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see <a href="www.env.nm.gov/aqb/modeling/class1areas.html">www.env.nm.gov/aqb/modeling/class1areas.html</a> )? ☐ Yes ☐ No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: N/A					
9	Name nearest Class I area: Weminuche Wilderness					
10	Shortest distance	ce (in km) from fa	acility boundary to the boundary	ndary of the nearest Class I	area (to the	nearest 10 meters): 53.83 km
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: ~3,300 meters					
12	Method(s) used to delineate the Restricted Area: Fencing  "Restricted Area" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.					
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC?  Yes No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.					
14	,		unction with other air regul mit number (if known) of the	ated parties on the same pr ne other facility?	operty?	⊠ No ☐ Yes

Section 1-E: Proposed Operating Schedule (The 1-E.1 & 1-E.2 operating schedules may become conditions in the permit.)

1	Facility <b>maximum</b> operating $(\frac{\text{hours}}{\text{day}})$ : 24 $(\frac{\text{days}}{\text{week}})$ : 7 $(\frac{\text{weeks}}{\text{year}})$ : 52 $(\frac{\text{hours}}{\text{year}})$ : 8,760		
2	Facility's maximum daily operating schedule (if less than $24 \frac{\text{hours}}{\text{day}}$ )? Start: N/A $\frac{\text{AM}}{\text{PM}}$ End: N/A $\frac{\text{AM}}{\text{PM}}$		
3	Month and year of anticipated start of construction: N/A		
4	Month and year of anticipated construction completion: N/A		
5	Month and year of anticipated startup of new or modified facility: N/A		
6	Will this facility operate at this site for more than one year?   ☑ Yes □ No		

**Section 1-F: Other Facility Information** 

	cuon 11. Other racinty information				
1	Are there any current Notice of Violations (NOV), compliance orders, or any other compliance or enforcement issues related to this facility?   Yes No If yes, specify:				
a	If yes, NOV date or description of issue: N/A		NOV Tracking No: N/A		
b	Is this application in response to any issue listed in 1-F, 1 or 1a above	e? □Yes	X No If Y	es, provide the 1c & 1d info below:	
c	Document Title: N/A Date: 1	N/A	_	ment # (or nd paragraph #): N/A	
d	d Provide the required text to be inserted in this permit: N/A				
2	Is air quality dispersion modeling or modeling waiver being submitted with this application?				
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? ☐ Yes ☒ No				
4	Will this facility be a source of federal Hazardous Air Pollutants (HAP)? ▼ Yes □ No				
a	If Yes, what type of source? $\boxed{\mathbf{X}}$ Major $\boxed{\mathbf{X}} \ge 10$ tpy of any single $\boxed{\mathbf{OR}}$ $\boxed{\mathbf{OR}}$ $\boxed{\mathbf{Minor}}$ ( $\boxed{\mathbb{C}} \le 10$ tpy of any single $\boxed{\mathbf{N}}$			tpy of any combination of HAPS) tpy of any combination of HAPS)	
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☐ Yes 🗓 No				
a	If yes, include the name of company providing commercial electric process and commercial power is purchased from a commercial utility company site for the sole purpose of the user.		-	loes not include power generated on	

# Section 1-G: Streamline Application (This section applies to 20.2.72.300 NMAC Streamline applications only) 1 □ I have filled out Section 18, "Addendum for Streamline Applications." \(\begin{align\*} \text{X} \text{N/A} \text{(This is not a Streamline application.} \end{align\*}

**Section 1-H:** Current Title V Information - Required for all applications from TV Sources (Title V-source required information for all applications submitted pursuant to 20.2.72 NMAC (Minor Construction Permits), or 20.2.74/20.2.79 NMAC (Major PSD/NNSR applications), and/or 20.2.70 NMAC (Title V))

20.2.7	20.2.74/20.2.79 NMAC (Major PSD/NNSK applications), and/or 20.2.70 NMAC (Title V))					
1	Responsible Official (R.O.) (20.2.70.300.D.2 NMAC):	Travis Jones		Phone: 713-289-2630		
a	R.O. Title:	EH&S Manager	R.O. e-mail: trjo	ones@harvestmidstream.com		
b	R. O. Address:	1111 Travis Street, Houston, TX	77002			
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC):	TBD		Phone: TBD		
a	A. R.O. Title:	TBD	A. R.O. e-mail:	TBD		
b	A. R. O. Address:	TBD				
3	Company's Corporate or Partnership Relationship to any other Air Quality Permittee (List the names of any companies that have operating (20.2.70 NMAC) permits and with whom the applicant for this permit has a corporate or partnership relationship):  N/A					
4	Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.): Hilcorp Energy Company					
a	Address of Parent Company:	1111 Travis Street, Houston, TX	77002			
5		s ("Subsidiary Companies" means company to be permitted.): N/A		hes, divisions or subsidiaries, which are		
6	Telephone numbers & names of	the owners' agents and site contact	ts familiar with plan	t operations: N/A		

Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B)? If yes, state which ones and provide the distances in kilometers: Yes. Colorado (7.5 km); Southern Ute Tribe (7.5 km), Jicarilla Apache Tribe (32.4 km), Navajo Nation Tribal lands (34.2 km), Ute Mountain Ute Tribe (61.4 km).

# **Section 1-I – Submittal Requirements**

Each 20.2.73 NMAC (**NOI**), a 20.2.70 NMAC (**Title V**), a 20.2.72 NMAC (**NSR** minor source), or 20.2.74 NMAC (**PSD**) application package shall consist of the following:

### **Hard Copy Submittal Requirements:**

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- 1) One hard copy original signed and notarized application package printed double sided 'head-to-toe' 2-hole punched as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be head-to-head. Please use numbered tab separators in the hard copy submittal(s) as this facilitates the review process. For NOI submittals only, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required. Please include a copy of the check on a separate page.
- 2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This <u>copy</u> should be printed in book form, 3-hole punched, and <u>must be double sided</u>. Note that this is in addition to the head-to-to 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.
- 3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these permit application submittals, two CD copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a single CD submittal. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB's secure file transfer service.

### **Electronic files sent by (check one):**

X CD/DVD attached to paper application	
☐ secure electronic transfer. Air Permit Con	tact Name
	Email
	Phone number

- a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.**
- 4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.
- 5) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver** and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling **summary report only** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.
- 6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
  - a. one additional CD copy for US EPA,
  - b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
  - c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

If the application is submitted electronically through the secure file transfer service, these extra CDs do not need to be submitted.

#### **Electronic Submittal Requirements** [in addition to the required hard copy(ies)]:

**General Facility Information** 

**Other Relevant Information** 

**Certification Page** 

**Addendum for Landfill Applications** 

**Section 1:** 

Section 20:

**Section 21:** 

Section 22:

- 1) All required electronic documents shall be submitted as 2 separate CDs or submitted through the AQB secure file transfer service. Submit a single PDF document of the entire application as submitted and the individual documents comprising the application.
- 2) The documents should also be submitted in Microsoft Office compatible file format (Word, Excel, etc.) allowing us to access the text and formulas in the documents (copy & paste). Any documents that cannot be submitted in a Microsoft Office compatible format shall be saved as a PDF file from within the electronic document that created the file. If you are unable to provide Microsoft office compatible electronic files or internally generated PDF files of files (items that were not created electronically: i.e. brochures, maps, graphics, etc.), submit these items in hard copy format. We must be able to review the formulas and inputs that calculated the emissions.
- 3) It is preferred that this application form be submitted as 4 electronic files (3 MSWord docs: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and 1 Excel file of the tables (Universal Application section 2 [UA2]). Please include as many of the 3-19 Sections as practical in a single MS Word electronic document. Create separate electronic file(s) if a single file becomes too large or if portions must be saved in a file format other than MS Word.
- 4) The electronic file names shall be a maximum of 25 characters long (including spaces, if any). The format of the electronic Universal Application shall be in the format: "A-3423-FacilityName". The "A" distinguishes the file as an application submittal, as opposed to other documents the Department itself puts into the database. Thus, all electronic application submittals should begin with "A-". Modifications to existing facilities should use the core permit number (i.e. '3423') the Department assigned to the facility as the next 4 digits. Use 'XXXX' for new facility applications. The format of any separate electronic submittals (additional submittals such as non-Word attachments, re-submittals, application updates) and Section document shall be in the format: "A-3423-9-description", where "9" stands for the section # (in this case Section 9-Public Notice). Please refrain, as much as possible, from submitting any scanned documents as this file format is extremely large, which uses up too much storage capacity in our database. Please take the time to fill out the header information throughout all submittals as this will identify any loose pages, including the Application Date (date submitted) & Revision number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

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## **Table 2-A: Regulated Emission Sources**

Unit and stack numbering must correspond throughout the application package. If applying for a NOI under 20.2.73 NMAC, equipment exemptions under 2.72.202 NMAC do not apply.

Unit Number <sup>1</sup>	Source Description	Make	Model #	Serial#	Manufact- urer's Rated Capacity <sup>3</sup> (Specify Units)	Requested Permitted Capacity <sup>3</sup> (Specify Units)	Date of Manufacture <sup>2</sup> Date of Construction/ Reconstruction <sup>2</sup>	Controlled by Unit # Emissions vented to Stack #	Source Classi- fication Code (SCC)	For Each Piece of Equipn	ment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) <sup>4</sup>	Replacing Unit No.
			50 40 GY	TD-D	4.450.1	4 2 5 5 1	TBD	N/A		0 ( 0 /	o be Removed	407 P	27/4
1	Compressor Engine	Waukesha	7042GL	TBD	1,478 hp	1,357 hp	TBD	1	20200202		eplacement Unit be Replaced	4SLB	N/A
2	C F :	337 1 1	704261	C-11786/2 (Pkg.	1 470 1	1 2571	2/8/1995	N/A	20200000	X Existing (unchanged) Te	o be Removed	4CL D	27/4
2	Compressor Engine	Waukesha	7042GL	X00009)	1,478 hp	1,357 hp	2/8/1995	2	20200202		eplacement Unit be Replaced	4SLB	N/A
2	C	Waalaalaa	7042CI	368329	1 470 1	1 257 1	6/8/1981	N/A	20200202		o be Removed	4CL D	NI/A
3	Compressor Engine	Waukesha	7042GL	(Pkg. 76739)	1,478 hp	1,357 hp	6/8/1981	3	20200202		eplacement Unit be Replaced	4SLB	N/A
4	C F :	337 1 1	704261	338514	1 470 1	1 2571	1/22/1980	N/A	20200000	X Existing (unchanged) Te	o be Removed	4CL D	27/4
4	Compressor Engine	Waukesha	7042GL	(Pkg. X00060)	1,478 hp	1,357 hp	1/22/1980	4	20200202		eplacement Unit be Replaced	4SLB	N/A
_			50.42 GT	TDD	4.450.1	4 2 5 5 1	TBD	N/A			o be Removed	AGY D	27/4
5	Compressor Engine	Waukesha	7042GL	TBD	1,478 hp	1,357 hp	TBD	5	20200202		eplacement Unit be Replaced	4SLB	N/A
				C-12597/1			5/11/1998	N/A		X Existing (unchanged) Te	o be Removed		
6	Compressor Engine	Waukesha	7042GL	(Pkg. X00022)	1,478 hp	1,357 hp	5/11/1998	6	20200202		eplacement Unit be Replaced	4SLB	N/A
				C-338549			8/26/1998	7		X Existing (unchanged) Te	o be Removed		
7	Compressor Engine	Waukesha	7042GL	(Pkg. X00097)	1,478 hp	1,357 hp	8/26/1998	7	20200202		eplacement Unit be Replaced	4SLB	N/A
							TBD	8			o be Removed		
8	Compressor Engine	Waukesha	7042GL	TBD	1,478 hp	1,357 hp	TBD	8	20200202		eplacement Unit be Replaced	4SLB	N/A
				C-12679/2			9/24/1998	13			o be Removed		
13	Compressor Engine	Waukesha	7042GL	(Pkg. X00098)	1,478 hp	1,357 hp	9/24/1998	13	20200202		eplacement Unit b be Replaced	4SLB	N/A
				C-11061/2			12/2/1993	15			o be Removed		
15	Compressor Engine	Waukesha	7042GL	(Pkg. X00033)	1,478 hp	1,357 hp	12/2/1993	15	20200202		eplacement Unit b be Replaced	4SLB	N/A
							TBD	16			o be Removed		
16	Compressor Engine	Waukesha	7042GL	TBD	1,478 hp	1,357 hp	TBD	16	20200202		eplacement Unit be Replaced	4SLB	N/A
							TBD	18			o be Removed		
18	Compressor Engine	Waukesha	7042GL	TBD	1,478 hp	1,357 hp	TBD	18	20200202		eplacement Unit be Replaced	4SLB	N/A
				C-11474/1			10/17/1994	19			o be Removed		
19	Compressor Engine	Waukesha	7042GL	(Pkg. X00118)	1,478 hp	1,357 hp	10/17/1994	19	20200202		eplacement Unit be Replaced	4SLB	N/A
				C-12572/2			2/27/1998	20			o be Removed		
20	Compressor Engine	Waukesha	7042GL	(Pkg. X00117)	1,478 hp	1,357 hp	2/27/1998	20	20200202		eplacement Unit	4SLB	N/A
				219289			10/26/1971	21			be Replaced To be Removed		
21	Compressor Engine	Waukesha	7042GL	(Pkg. X00037)	1,478 hp	1,357 hp	10/26/1971	21	20200202		eplacement Unit to be Replaced	4SLB	N/A
							TBD	22			o be Removed		
22	Compressor Engine	Waukesha	7042GL	TBD	1,478 hp	1,357 hp	TBD	22	20200202	New/Additional Re	eplacement Unit	4SLB	N/A
			1				TBD	23			be Replaced To be Removed		
23	Compressor Engine	Waukesha	7042GL	TBD	1,478 hp	1,357 hp	TBD	23	20200202	New/Additional Re	eplacement Unit	4SLB	N/A
			1			l	100	23	l	To Be Modified To	be Replaced	<u> </u>	1

Part	Har	vest Four Corners, LLC						32-7 CDP					Oct. 2019	: Rev. 0
Compression & Associated   Piping   P		Source Description	Make	Model#	Serial #	urer's Rated Capacity <sup>3</sup> (Specify	Permitted Capacity <sup>3</sup> (Specify	Manufacture <sup>2</sup> Date of  Construction/	by Unit # Emissions vented to	Classi- fication Code	For Each Piece of Eq	uipment, Check One	Type (CI, SI, 4SLB, 4SRB,	Replacing Unit
Secondary   Complement Secondary   Complement Continue   Complem											X Existing (unchanged)	To be Removed		
Part	SSM <sup>5</sup>	•	N/A	N/A	N/A	N/A	N/A				New/Additional	Replacement Unit	N/A	N/A
Dehydrator Rebotler   Eneroic   12912/M11   41692   12 mmcfd   4/11/1902   NA   1/1092   NA   1/10	-	Tiping												
Delaydrator Rebuiler   Emerick   J2P12M11   109   41662   1,208 sch   1,208 sch   47/1902   50a   47/1902   47/190	9a	Dehydrator Still Vent	Enertek		41662	12 mmcfd	12 mmcfd			31000227	New/Additional	Replacement Unit	N/A	N/A
Dehydrator Reboiler   Enerole   109   41692   1.208 seth   1.208 seth   4.171902   90   110.0729														
Debydrator Still Vent	9b	Dehydrator Reboiler	Enertek		41662	1,208 scfh	1,208 scfh			31000228	0 1		N/A	N/A
Dehydrator Selil Vent				109			·							
10b	10a	Dehvdrator Still Vent	Enertek		41999	12 mmcfd	12 mmcfd	11/1/1992	N/A	31000227			N/A	N/A
Dehydrator Reboiler   Enertick   109   1208 seth   10/1995   1208 seth   10/1995   100   10/1995   100   10/1995   100   10/1995   100   10/1995   100   10/1995   100   10/1995   10/19		. ,		109				11/1/1992	10a		To Be Modified	To be Replaced		
11a	10b	Dehydrator Rehoiler	Enertek	J2P12M11	41999	1 208 sefh	1 208 sofh	11/1/1992	N/A	31000228	0 1		N/A	N/A
Dehydrator Still Vent	100	Deliyarator Reboner	Elicitek	109	41999	1,200 50111	1,206 SCIII	11/1/1992	10b	31000220			IV/A	IN/A
10	1.1	D.I. I. C. C. T.I.	E . 1	J2P20M11	12670	20 61	20 61	10/1/1993	N/A				27/4	3.7/4
Dehydrator Reboiler	Ha	Dehydrator Still Vent	Enertek		42670	20 mmcfd	20 mmcfd	10/1/1993	11a	31000227			N/A	N/A
Dehydrator Reboiler   Enertek   109   42670   1,648 sch   1,648 sch   1011/1993   11b   11000228   New Additional   To be Replaced   To be R				I2P20M11				10/1/1993	N/A					
Dehydrator Still Vent   Enertek   1920M11   109   3869-C   20 mmcfd   Not available   N/A   Not available   12a   31000229   Not available   17a   17a   Not available   17a	11b	Dehydrator Reboiler	Enertek		42670	1,648 scfh	1,648 scfh			31000228			N/A	N/A
Dehydrator Still Vent   Enertek   109   3869-C   20 mmcfd   20 mmcfd   12a   31000227   Not available   12a   100027   Not available   12b   10   Not available   12b   Not available   12b   Not available   12b   Not available   Not avai				120201411										
12b	12a	Dehydrator Still Vent	Enertek		3869-C	20 mmcfd	20 mmcfd			31000227			N/A	N/A
Dehydrator Reboiler   Enertek   109   3869-C   1,648 scfh   1,648 scfh   109   20 mmcfd   Not available   12b   To be Modified   To be Replaced   To be Replaced   Not available   12b   To be Modified   To be Replaced   Not available   N/A				-										
24a   Dehydrator Still Vent   Enertek   12P20M11   109   42268   20 mmcfd   20 mmcfd   Not available   24a   1000227   Not available   150 be Replaced   N/A   N	12b	Dehydrator Reboiler	Enertek		3869-C	1,648 scfh	1,648 scfh			31000228	0 1		N/A	N/A
Dehydrator Still Vent   Enertek   109   42268   20 mmcfd   Not available   24				109								•		
24b   Dehydrator Reboiler   Enertek   12P20M11   109   42268   1,648 scfh   1,648 scfh   109   42268   1,648 scfh   109	24a	Dehydrator Still Vent	Enertek		42268	20 mmcfd	20 mmcfd	Not available		31000227			N/A	N/A
24b   Dehydrator Reboiler   Enertek   109   42268   1,648 scfh   1,648 scfh   1,648 scfh   109   20 mmcfd   20 mmcfd   109   TBD   20 mmcfd   20 mmcfd   109   TBD   20 mmcfd   109   TBD   1,648 scfh				109				Not available	24a		To Be Modified	To be Replaced		
25a   Dehydrator Still Vent   Enertek   J2P20M11   109   TBD   20 mmcfd   20 mmcfd   TBD   25a   TBD   N/A	24b	Dehydrator Rehoiler	Enertek		42268	1 648 sefh	1 648 sofh	3/1/1993	N/A	31000228			N/A	N/A
Dehydrator Still Vent   Enertek   J2P20M11   109	240	Denyarator Resoner	Elicitek	109	42200	1,040 30111	1,040 30111	3/1/1993	24b	51000220	To Be Modified		14/14	14/14
Dehydrator Reboiler	250	Dahridratar Still Vant	Enortals	J2P20M11	TDD	20 mm of d	20 mm of d	TBD	N/A	21000227	0 1		NI/A	NI/A
Dehydrator Reboiler	23a	Denyurator Sun Vent	Ellertek		IBD	20 minera	20 minera	TBD	25a	31000227			IN/A	IN/A
Produced Water Storage   Tank   Produced Water Storage   To be Removed   Produced Water Storage   To be Removed   Produced Water Storage   Produced Water Sto				J2P20M11				TBD	N/A		0\ 0 /			
Produced Water Storage   Tank	25b	Dehydrator Reboiler	Enertek		TBD	1,648 scth	1,648 scth	TBD	25b	31000228			N/A	N/A
T-38 Tank Not available available Tank Not available Ava		Produced Water Storage		Not										
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	T-38	_	Not available		Not available	300 bbl	300 bbl			40400315			N/A	N/A
T-39 Froduced Water Storage Tank Mfg. Co. available Tank And Available Tank Mfg. Co. available Tank Mf		D 1 1W/4 C4	D : T 1 0	N										
T-40 Produced Water Storage Tank Benchmark Eqpt & Not Tanks, Inc.  Benchmark Eqpt & Not To be Removed To be Replaced  N/A  N/A  N/A  N/A  N/A  N/A  N/A  N/	T-39				24383	300 bbl	300 bbl			40400315	X New/Additional	Replacement Unit	N/A	N/A
T-40 Produced water storage Tank   Benchmark Eqpt & Not available   3645   500 bbl   500 bbl   500 bbl   500 bbl   500 bbl   2015   T40   40400315   X New/Additional To Be Modified To be Replaced   N/A			-											
F-1 Fugitive Emissions N/A	T-40	6	**		3645	500 bbl	500 bbl			40400315	X New/Additional	Replacement Unit	N/A	N/A
F-1 Fugitive Emissions N/A		1 alik	ranks, me.	available										
M-1 Malfunction Emissions N/A	F-1	Fugitive Emissions	N/A	N/A	N/A	N/A	N/A			1 -			N/A	N/A
M-1 Malfunction Emissions N/A								N/A	N/A		To Be Modified	To be Replaced		
	M-1	Malfunction Emissions	N/A	N/A	N/A	N/A	N/A	N/A	N/A	<b>↓</b>			N/A	N/A
	1		1,111	1,/11	- 1/2 E	1,771	1.7/11	N/A	N/A				- 1/12	1.1/11

<sup>&</sup>lt;sup>1</sup> Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.

<sup>&</sup>lt;sup>2</sup> Specify dates required to determine regulatory applicability

<sup>&</sup>lt;sup>3</sup> To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set

<sup>4 &</sup>quot;4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignitio

 $<sup>^{5}</sup>$  "SSM" is identified as "SSM from 1a-8a, 13a, 15a, 16a & 18a-23a" in Operating Permit P195-R3.

#### **Table 2-B:** Insignificant Activities (20.2.70 NMAC) **OR Exempted Equipment** (20.2.72 NMAC)

All 20.2.70 NMAC (Title V) applications must list all Insignificant Activities in this table. All 20.2.72 NMAC applications must list Exempted Equipment in this table. If equipment listed on this table is exempt under 20.2.72.202.B.5, include emissions calculations and emissions totals for 202.B.5 "similar functions" units, operations, and activities in Section 6, Calculations. Equipment and activities exempted under 20.2.72.202 NMAC may not necessarily be Insignificant under 20.2.70 NMAC (and vice versa). Unit & stack numbering must be consistent throughout the application package. Per Exemptions Policy 02-012.00 (see http://www.env.nm.gov/aqb/permit/aqb\_pol.html ), 20.2.72.202.B NMAC Exemptions do not apply, but 20.2.72.202.A NMAC exemptions do apply to NOI facilities under 20.2.73 NMAC. List 20.2.72.301.D.4 NMAC Auxiliary Equipment for Streamline applications in Table 2-A. The List of Insignificant Activities (for TV) can be found online at http://www.env.nm.gov/aqb/forms/InsignificantListTitleV.pdf . TV sources may elect to enter both TV Insignificant Activities and Part 72 Exemptions on this form.

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Piece of E	quipment, Check Onc
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>		
T-1	Westernator Stores a Toule			165			X Existing (unchanged)	To be Removed
1-1	Wastewater Storage Tank			bbl	Insignificant Activity List Item #5		New/Additional To Be Modified	Replacement Unit To be Replaced
	T. 1030 T. 1			165			X Existing (unchanged)	To be Removed
T-2	Used Oil Storage Tank			bbl	Insignificant Activity List Item #5		New/Additional To Be Modified	Replacement Unit To be Replaced
				100			X Existing (unchanged)	To be Removed
T-3	Lubrication Oil Storage Tank			bbl	Insignificant Activity List Item #5		New/Additional To Be Modified	Replacement Unit To be Replaced
				150			Existing (unchanged)	
T-4	Produced Water Storage Tank			bbl	Insignificant Activity List Item #1		New/Additional	Replacement Unit
					Insignificant Activity List Item #1		To Be Modified  X Existing (unchanged)	To be Replaced To be Removed
T-5 - T-17	Lubrication Oil Storage Tank			500			New/Additional	Replacement Unit
				gal	Insignificant Activity List Item #5		To Be Modified	To be Replaced
T-18 - T-21	Triethylene Glycol (TEG)			100			X Existing (unchanged) New/Additional	To be Removed Replacement Unit
1-10 - 1-21	Storage Tank			gal	Insignificant Activity List Item #5		To Be Modified	To be Replaced
T 00 T 05	Triethylene Glycol (TEG)			50			X Existing (unchanged)	To be Removed
T-22 - T-25	Storage Tank			gal	Insignificant Activity List Item #5		New/Additional To Be Modified	Replacement Unit To be Replaced
				500			X Existing (unchanged)	To be Removed
T-26	Methanol			gal	Insignificant Activity List Item #1		New/Additional To Be Modified	Replacement Unit To be Replaced
				500	mognificant retivity East tenn wi		X Existing (unchanged)	To be Removed
T-27	Solvent Storage Tank				In a second A state I at I am HE		New/Additional	Replacement Unit
				gal	Insignificant Activity List Item #5		To Be Modified  X Existing (unchanged)	To be Replaced To be Removed
T-28	Triethylene Glycol (TEG)			500			New/Additional	Replacement Unit
	Storage Tank			gal	Insignificant Activity List Item #5		To Be Modified	To be Replaced
T-29	Antifreeze Storage Tank			500			X Existing (unchanged) New/Additional	To be Removed Replacement Unit
1-2)	Antineeze Storage Tank			gal	Insignificant Activity List Item #5		To Be Modified	To be Replaced
T 20 T 22	T 1 1 2 0 0 1 0			500			X Existing (unchanged)	To be Removed
T-30 - T-33	Lubrication Oil Storage Tank			gal	Insignificant Activity List Item #5		New/Additional To Be Modified	Replacement Unit To be Replaced
	Triethylene Glycol (TEG)			100			X Existing (unchanged)	To be Removed
T-34 - T-35	Storage Tank			gal	Insignificant Activity List Item #5		New/Additional To Be Modified	Replacement Unit To be Replaced
	Tri-st-down Closed (TDC)			50			X Existing (unchanged)	To be Removed
T-36 - T-37	Triethylene Glycol (TEG) Storage Tank				Incignificant Activity Light Item #5		New/Additional	Replacement Unit
	Storage rank			gal	Insignificant Activity List Item #5		To Be Modified  X Existing (unchanged)	To be Replaced To be Removed
L-1	Truck Loading Emissions			N/A		ļ	New/Additional	Replacement Unit
				N/A	Insignificant Activity List Item #1		To Be Modified	To be Replaced
							Existing (unchanged) New/Additional	To be Removed Replacement Unit
							To Be Modified	To be Replaced

<sup>&</sup>lt;sup>1</sup> Insignificant activities exempted due to size or production rate are defined in 20.2.70.300.D.6, 20.2.70.7.Q NMAC, and the NMED/AQB List of Insignificant Activities, dated September 15, 2008. Emissions from these insignificant activities do not need to be reported, unless specifically requested.

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<sup>&</sup>lt;sup>2</sup> Specify date(s) required to determine regulatory applicability.

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### **Table 2-C: Emissions Control Equipment**

Unit and stack numbering must correspond throughout the application package. Only list control equipment for TAPs if the TAP's maximum uncontrolled emissions rate is over its respective threshold as listed in 20.2.72 NMAC, Subpart V, Tables A and B. In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions.

Control Equipment Unit No.	Control Equipment Description	Date Installed	Controlled Pollutant(s)	Controlling Emissions for Unit Number(s) <sup>1</sup>	Efficiency (% Control by Weight)	Method used to Estimate Efficiency
7	Oxidation Catalytic Converter	8/26/1998	CO, VOC, HCHO	7	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
8	Oxidation Catalytic Converter	10/15/1998	CO, VOC, HCHO	8	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
13	Oxidation Catalytic Converter	10/24/1996	CO, VOC, HCHO	13	CO >90%; VOC >80%; HCHO >80%	Mfg. specs
15	Oxidation Catalytic Converter	5/5/2000	CO, VOC, HCHO	15	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
16	Oxidation Catalytic Converter	TBD	CO, VOC, HCHO	16	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
18	Oxidation Catalytic Converter	TBD	CO, VOC, HCHO	18	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
19	Oxidation Catalytic Converter	9/20/2004	CO, VOC, HCHO	19	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
20	Oxidation Catalytic Converter	9/20/2004	CO, VOC, HCHO	20	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
21	Oxidation Catalytic Converter	10/7/2004	CO, VOC, HCHO	21	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
22	Oxidation Catalytic Converter	TBD	CO, VOC, HCHO	22	CO >93%; VOC >79%; HCHO >79%	Mfg. specs
23	Oxidation Catalytic Converter	TBD	CO, VOC, HCHO	23	CO >93%; VOC >79%; HCHO >79%	Mfg. specs

<sup>&</sup>lt;sup>1</sup> List each control device on a separate line. For each control device, list all emission units controlled by the control device.

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## Table 2-D: Maximum Emissions (under normal operating conditions)

#### This Table was intentionally left blank because it would be identical to Table 2-E.

Maximum Emissions are the emissions at maximum capacity and prior to (in the absence of) pollution control, emission-reducing process equipment, or any other emission reduction. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) & Toxic Air Pollutants (TAPs) in Table 2-I. Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

Unit No.	NO	Ox	C	0	V	OC	SO	Ox	PI	$\mathbf{M}^1$	PM	110 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н	$_2$ S	Le	ead
Cint 140.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
1	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
2	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
3	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
4	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	1	-	1	-
5	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	1	-
6	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	1	-	1	-
7	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
8	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
13	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
15	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
16	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
18	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
19	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
20	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
21	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
22	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
23	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
SSM <sup>2</sup>	-	-	-	-	-	14.3	-	-	-	-	-	-	-	-	-	-	-	-
9a <sup>2</sup>	-	-	-	-	3.4	15.0	-	-	-	-	-	-	-	-	-	-	-	-
9b	4.3E-02	0.19	3.3E-02	0.14	4.8E-03	2.1E-02	8.3E-04	3.7E-03	9.2E-03	4.0E-02	9.2E-03	4.0E-02	9.2E-03	4.0E-02	-	-	-	-
10a <sup>2</sup>	-	-	-	-	3.4	15.0	-	-	-	-	-	-	-	-	-	-	-	-
10b	4.3E-02	0.19	3.3E-02	0.14	4.8E-03	2.1E-02	8.3E-04	3.7E-03	9.2E-03	4.0E-02	9.2E-03	4.0E-02	9.2E-03	4.0E-02	-	-	-	-
11a <sup>2</sup>	-	-	-	-	3.5	15.3	-	-	-	-	-	-	-	-	-	-	-	-
11b	4.3E-02	0.19	4.5E-02	0.20	6.5E-03	2.8E-02	8.3E-04	3.7E-03	1.3E-02	5.5E-02	1.3E-02	5.5E-02	1.3E-02	5.5E-02	-	-	-	-
12a <sup>2</sup>	-	-	-	-	3.5	15.3	-	-	-	-	-	-	-	-	-	-	-	-
12b	4.3E-02	0.19	4.5E-02	0.20	6.5E-03	2.8E-02	8.3E-04	3.7E-03	1.3E-02	5.5E-02	1.3E-02	5.5E-02	1.3E-02	5.5E-02	-	-	-	-

Unit No.	NO	Ox	C	O	V	OC	SC	Ox	PI	$\mathbf{M}^1$	PM	[10 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н	$_2$ S	Le	ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
$24a^2$	-	-	-	1	3.5	15.3	-	-	-	-	-	-	-	-	•	-	1	-
24b	4.3E-02	0.19	4.5E-02	0.20	6.5E-03	2.8E-02	8.3E-04	3.7E-03	1.3E-02	5.5E-02	1.3E-02	5.5E-02	1.3E-02	5.5E-02	-	-	-	-
$25a^2$	-	-	-	-	3.5	15.3	-	-	-	-	-	-	-	-	-	-	-	-
25b	4.3E-02	0.19	4.5E-02	0.20	6.5E-03	2.8E-02	8.3E-04	3.7E-03	1.3E-02	5.5E-02	1.3E-02	5.5E-02	1.3E-02	5.5E-02	-	-	-	-
T-38	-	-	-	-	0.93	4.1	-	-	-	-	-	-	-	-	-	-	-	-
T-39	-	-	-	-	With T-38	With T-38	-	-	-	-	-	-	-	-	-	-	-	-
T-40					With T-38	With T-38												
F-1 <sup>2</sup>	-	-	-	-	0.91	4.00	-	-	-	-	-	-	-	-	-	-	-	-
M-1	-	-	-	-	-	10.0	-	-	-	-	-	-	-	-	-	-	-	-
Totals	46.16	201.73	140.15	613.92	73.55	346.54	0.11	0.46	1.77	7.75	1.77	7.75	1.77	7.75	-	-	-	-

<sup>1</sup>Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

<sup>&</sup>lt;sup>2</sup> The VOC emission rate(s) from SSM, dehydrators (units 9a, 10a, 11a, 12a, 24a, & 25a) and fugitive emissions (unit F-1) are carried forward from Operating Permit P195-R3 and Construction Permit 1032-M9 (because it results in more conservative (higher) estimates of VOC emissions).

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# **Table 2-E: Requested Allowable Emissions**

Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E<sup>-4</sup>).

Unit No.	N(	Ox	C	0	V	OC	S	Ox	P	$M^1$	PM	[10 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н	$_{2}S$	Le	ad
Cint 140.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
1	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
2	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	•	-	•	-
3	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	1	-	1	-
4	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	1	-	1	-
5	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	1	-	1	-
6	2.7	11.8	8.2	36.1	3.0	13.1	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	1	-	1	-
7	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	1	-	1	-
8	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
13	2.7	11.8	0.8	3.6	0.6	2.6	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	1	-
15	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
16	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
18	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
19	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
20	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
21	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
22	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	1	-
23	2.7	11.8	0.6	2.5	0.6	2.8	5.9E-03	2.6E-02	0.10	0.44	0.10	0.44	0.10	0.44	-	-	-	-
SSM <sup>2</sup>	-	-	-	-	-	14.3	-	-	-	-	-	-	-	-	-	-	-	-
9a <sup>2</sup>	-	-	-	-	3.4	15.0	-	-	-	-	-	-	-	-	-	-	-	-
9b	4.3E-02	0.19	3.3E-02	0.14	4.8E-03	2.1E-02	8.3E-04	3.7E-03	9.2E-03	4.0E-02	9.2E-03	4.0E-02	9.2E-03	4.0E-02	-	-	1	-
$10a^2$	-	1	-	-	3.4	15.0	-	-	-	-	-	-	-	-	-	-	-	-
10b	4.3E-02	0.19	3.3E-02	0.14	4.8E-03	2.1E-02	8.3E-04	3.7E-03	9.2E-03	4.0E-02	9.2E-03	4.0E-02	9.2E-03	4.0E-02	-	-	-	-
$11a^2$	-	-	-	-	3.5	15.3	-	-	-	-	-	-	-	-	-	-	-	-
11b	4.3E-02	0.19	4.5E-02	0.20	6.5E-03	2.8E-02	8.3E-04	3.7E-03	1.3E-02	5.5E-02	1.3E-02	5.5E-02	1.3E-02	5.5E-02	-	-	-	-
$12a^2$	-	-	-	-	3.5	15.3	-	-	-	-	-	-	-	-	-	-	-	-
12b	4.3E-02	0.19	4.5E-02	0.20	6.5E-03	2.8E-02	8.3E-04	3.7E-03	1.3E-02	5.5E-02	1.3E-02	5.5E-02	1.3E-02	5.5E-02	-	-	-	-

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Unit No.	NO	Ox	C	0	V	OC	S	Ox	Pl	M <sup>1</sup>	PM	[10 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н	<sub>2</sub> S	Le	ead
Onit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
24a <sup>2</sup>	-	-	-	-	3.5	15.3	-	-	-	-	-	-	-	-	-	-	-	-
24b	4.3E-02	0.19	4.5E-02	0.20	6.5E-03	2.8E-02	8.3E-04	3.7E-03	1.3E-02	5.5E-02	1.3E-02	5.5E-02	1.3E-02	5.5E-02	-	-	-	-
25a <sup>2</sup>	-	-	-	-	3.5	15.3	-	-	-	-	-	-	-	-	-	-	-	-
25b	4.3E-02	0.19	4.5E-02	0.20	6.5E-03	2.8E-02	8.3E-04	3.7E-03	1.3E-02	5.5E-02	1.3E-02	5.5E-02	1.3E-02	5.5E-02	-	-	-	-
T-38	-	-	-	-	0.93	4.1	-	-	-	-	-	-	-	-	-	-	-	-
T-39	-	-	-	-	With T-38	With T-38	-	-	-	-	-	-	-	-	-	-	-	-
T-40					With T-38	With T-38	-	-	-	-	-	-	-	-	-	-	-	-
F-1 <sup>2</sup>	-	-	-	-	0.91	4.0	-	-	-	-	-	-	-	-	-	-	-	-
M-1	-	-	-	-	-	10.0	-	-	-	-	-	-	-	-	-	-	-	-
Totals	46.16	201.73	56.20	246.50	47.56	232.92	0.11	0.46	1.77	7.75	1.77	7.75	1.77	7.75	-	-	-	-

<sup>&</sup>lt;sup>1</sup> Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

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<sup>&</sup>lt;sup>2</sup> The VOC emission rate(s) from SSM, dehydrators (units 9a, 10a, 11a, 12a, 24a, & 25a) and fugitive emissions (unit F-1) are carried forward from Operating Permit P195-R3 and Construction Permit 1032-M9 (because it results in more conservative (higher) estimates of VOC emissions).

#### Table 2-F: Additional Emissions during Startup, Shutdown, and Routine Maintenance (SSM)

This table is intentionally left blank since all emissions at this facility due to routine or predictable startup, shutdown, or scenduled maintenance are no higher than those listed in Table 2-E and a malfunction emission limit is not already permitted or requested. If you are required to report GHG emissions as described in Section 6a, include any GHG emissions during Startup, Shutdown, and/or Scheduled Maintenance (SSM) in Table 2-P. Provide an explanations of SSM emissions in Section 6 and 6a.

All applications for facilities that have emissions during routine our predictable startup, shutdown or scheduled maintenance (SSM)<sup>1</sup>, including NOI applications, must include in this table the Maximum Emissions during routine or predictable startup, shutdown and scheduled maintenance (20.2.7 NMAC, 20.2.72.203.A.3 NMAC, 20.2.73.200.D.2 NMAC). In Section 6 and 6a, provide emissions calculations for all SSM emissions reported in this table. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (https://www.env.nm.gov/aqb/permit/aqb\_pol.html) for more detailed instructions. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

Unit No.	N	Ox	C	0	V	OC	S	Ox	P	$M^2$	PM	110 <sup>2</sup>	PM	2.5 <sup>2</sup>	Н	$I_2S$	Le	ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr		lb/hr	ton/yr	lb/hr	ton/yr
SSM <sup>3</sup>	-	-	-	-	not specified	14.3	-	-	-	-	-	-	-	-	-	-	ı	-
$M-1^3$	-	-	-	-	not specified	10.0	-	-	-	-	-	-	-	-	-	-	-	-
Totals	-	-	-	-	not specified	24.30	-	-	-	-	-	-	-	-	-	-	-	-

<sup>&</sup>lt;sup>1</sup> **For instance**, if the short term steady-state Table 2-E emissions are 5 lb/hr and the SSM rate is 12 lb/hr, enter 7 lb/hr in this table. If the annual steady-state Table 2-E emissions are 21.9 TPY, and the number of scheduled SSM events result in annual emissions of 31.9 TPY, enter 10.0 TPY in the table below.

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<sup>&</sup>lt;sup>2</sup> Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

<sup>&</sup>lt;sup>2</sup> The VOC emission rate(s) from SSM and Malfunctions (unit M-1) are carried forward from Operating Permit P195-R3 and Construction Permit 1032-M9 (because it results in a more conservative (higher) estimate of

### Table 2-G: Stack Exit and Fugitive Emission Rates for Special Stacks

X I have elected to leave this table blank because this facility does not have any stacks/vents that split emissions from a single source or combine emissions from more than one source listed in table 2-A. Additionally, the emission rates of all stacks match the Requested allowable emission rates stated in Table 2-E.

Use this table to list stack emissions (requested allowable) from split and combined stacks. List Toxic Air Pollutants (TAPs) and Hazardous Air Pollutants (HAPs) in Table 2-I. List all fugitives that are associated with the normal, routine, and non-emergency operation of the facility. Unit and stack numbering must correspond throughout the application package. Refer to Table 2-E for instructions on use of

	Serving Unit	N	Ox	C	0	V	OC	S	Ox	P	M	PM	110	PM	12.5	H <sub>2</sub> S or	r Lead
Stack No.	Number(s) from Table 2-A	lb/hr	ton/yr	lb/hr	ton/yr												
	Takala																
	Totals:																

#### **Table 2-H: Stack Exit Conditions**

Unit and stack numbering must correspond throughout the application package. Include the stack exit conditions for each unit that emits from a stack, including blowdown venting parameters and tank emissions. If the facility has multiple operating scenarios, complete a separate Table 2-H for each scenario and, for each, type scenario name here:

Stack	Serving Unit Number(s)	Orientation (H-Horizontal	Rain Caps	Height Above	Temp.	Flow	Rate	Moisture by	Velocity	Inside
Number	from Table 2-A	V=Vertical)	(Yes or No)	Ground (ft)	(F)	(acfs)	(dscfs)	Volume (%)	(ft/sec)	Diameter (ft)
1	1	V	No	22	701	125.8	-	-	153.7	1.02
2	2	V	No	22	701	125.8	-	-	153.7	1.02
3	3	V	No	22	701	125.8	-	-	153.7	1.02
4	4	V	No	22	701	125.8	-	-	153.7	1.02
5	5	V	No	22	701	125.8	-	-	153.7	1.02
6	6	V	No	22	701	125.8	-	-	153.7	1.02
7	7	V	No	22	701	125.8	-	-	153.7	1.02
8	8	V	No	22	701	125.8	-	-	153.7	1.02
13	9	V	No	22	701	125.8	-	-	153.7	1.02
15	17	V	No	22	701	125.8	-	-	153.7	1.02
16	18	V	No	22	701	125.8	-	-	153.7	1.02
18	19	V	No	22	701	125.8	-	-	153.7	1.02
19	20	V	No	22	701	125.8	-	-	153.7	1.02
20	21	V	No	22	701	125.8	-	-	153.7	1.02
21	22	V	No	22	701	125.8	-	-	153.7	1.02
22	23	V	No	22	701	125.8	-	-	153.7	1.02
23	24	V	No	22	701	125.8	-	-	153.7	1.02
9b	9b	V	No	10	600	3.33	-	-	6.1	0.83
10b	10b	V	No	10	600	3.33	-	-	6.1	0.83
11b	11b	V	No	10	600	4.79	-	-	6.1	1.00
12b	12b	V	No	10	600	4.79	-	-	6.1	1.00
24b	24b	V	No	10	600	4.79	-	-	6.1	1.00
25b	25b	V	No	10	600	4.79	-	-	6.1	1.00

#### Table 2-I: Stack Exit and Fugitive Emission Rates for HAPs and TAPs

In the table below, report the Potential to Emit for each HAP from each regulated emission unit listed in Table 2-A, only if the entire facility emits the HAP at a rate greater than or equal to one (1) ton per year. For each such emission unit, HAPs shall be reported to the nearest 0.1 tpy. Each facility-wide Individual HAP total and the facility-wide Total HAPs shall be the sum of all HAP sources calculated to the nearest 0.1 ton per year. Per 20.2.72.403.A.1 NMAC, facilities not exempt [see 20.2.72.402.C NMAC] from TAP permitting shall report each TAP that has an uncontrolled emission rate in excess of its pounds per hour screening level specified in 20.2.72.502 NMAC. TAPs shall be reported using one more significant figure than the number of significant figures shown in the pound per hour threshold corresponding to the substance. Use the HAP nomenclature as it appears in Section 112 (b) of the 1990 CAAA and the TAP nomenclature as it listed in 20.2.72.502 NMAC. Include tank-flashing emissions estimates of HAPs in this table. For each HAP or TAP listed, fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected or the pollutant is emitted in a quantity less than the threshold amounts described above.

Stack No.	Unit No.(s)	Total	HAPs <sup>1</sup>	Benz X HAP o	zene <sup>1</sup> or TAP	Formal X HAP o		Tolu X HAP o		Name	Pollutant Here or TAP	Name	Pollutant Here or TAP	Provide Name HAP o		Name	Pollutant e Here or TAP	Name	Pollutant Here or TAP
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
1	1	0.5	2.3	-	0.1	0.5	2.2	-	-										
2	2	0.5	2.3	-	0.1	0.5	2.2	-	-										
3	3	0.5	2.3	-	0.1	0.5	2.2	-	-										
4	4	0.5	2.3	-	0.1	0.5	2.2	-	-										
5	5	0.5	2.3	-	0.1	0.5	2.2	-	-										
6	6	0.5	2.3	ı	0.1	0.5	2.2	1	-										
7	7	0.1	0.5	-	-	0.1	0.5	-	-										
8	8	0.1	0.5	-	-	0.1	0.5	-	-										
13	13	0.1	0.5	-	-	0.1	0.4	-	-										
15	15	0.1	0.5	-	-	0.1	0.5	-	-										
16	16	0.1	0.5	-	1	0.1	0.5	1	-										
18	18	0.1	0.5	ı	ī	0.1	0.5	1	-										
19	19	0.1	0.5	-	ı	0.1	0.5	-	-										
20	20	0.1	0.5	-	-	0.1	0.5	-	-										
21	21	0.1	0.5	-	-	0.1	0.5	-	-										
22	22	0.1	0.5	-	-	0.1	0.5	-	-										
23	23	0.1	0.5	-	-	0.1	0.5	-	-										
SSM	SSM	-	-	-	-	-	-	-	-										
9a	9a	0.3	1.2	0.1	0.3	-	-	0.2	0.8										
9b	9b	-	-			-	-												
10a	10a	0.3	1.2	0.1	0.3	-	-	0.2	0.8										
10b	10b	-	-			-	-												
11a	11a	0.3	1.2	0.1	0.3	-	-	0.2	0.8										
11b	11b	-	-			-	-												

Stack No.	Unit No.(s)	Total 1	HAPs <sup>1</sup>	Benz X HAP o	zene <sup>1</sup> or TAP		dehyde <sup>1</sup> or TAP		iene <sup>1</sup> or TAP	Name	Pollutant Here or TAP	Namo	Pollutant e Here or TAP						
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
12a	12a	0.3	1.2	0.1	0.3	-	-	0.2	0.8										
12b	12b	-	-			-	-												
24a	24a	0.3	1.2	0.1	0.3	-	-	0.2	0.8										
24b	24b	-	-			-	-												
25a	25a	0.3	1.2	0.1	0.3	-	-	0.2	0.8										
25b	25b	-	-	-	-	-	-												
T-38	T-38	-	0.7	-	0.1	-	-	-	0.1										
T-39	T-39	1	With T-38	-	With T-38	-	With T-38	-	With T-38										
T-40	T-40	-	With T-38	-	With T-38	-	With T-38	-	With T-38										
F-1	F-1	-	-	-	-	-	-	-	-										
M-1	M-1	-	0.2	-	-	-	-	-	0.2										
Totals		6.2	27.4	0.6	2.7	4.2	18.3	1.2	5.4										

<sup>&</sup>lt;sup>1</sup> The HAP emission rate(s) are carried forward from the Operating Permit P195-R3 and Construction Permit 1032-M9 applications (because it results in a more conservative (higher) estimate of HAP emissions).

Table 2-J: Fuel

Specify fuel characteristics and usage. Unit and stack numbering must correspond throughout the application package.

	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,		Specif	fy Units		
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
1	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
2	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
3	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
4	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
5	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
6	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
7	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
8	Natural gas Raw/Field Natural Gas		900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
13	Natural gas Raw/Field Natural Gas		900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
15	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
16	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
18	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
19	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
20	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
21	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
22	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
23	Natural gas	Raw/Field Natural Gas	900 Btu/scf	11,123 scfh	97.44 MMscfy	-	-
9b	Natural gas	Raw/Field Natural Gas	900 Btu/scf	1,208 scfh	10.58 MMscfy	-	-
10b	Natural gas	Raw/Field Natural Gas	900 Btu/scf	1,208 scfh	10.58 MMscfy	-	-

	Fuel Type (low sulfur Diesel,	Fuel Source: purchased commercial,	Specify Units									
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash					
11b	Natural gas	Raw/Field Natural Gas	900 Btu/scf	1,648 scfh	14.44 MMscfy	-	-					
12b	Natural gas	Raw/Field Natural Gas	900 Btu/scf	1,648 scfh	14.44 MMscfy	-	-					
24b	Natural gas	Raw/Field Natural Gas	900 Btu/scf	1,648 scfh	14.44 MMscfy	-	-					
25b	Natural gas	Raw/Field Natural Gas	900 Btu/scf	1,648 scfh	14.44 MMscfy	-	-					

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### Table 2-K: Liquid Data for Tanks Listed in Table 2-L

For each tank, list the liquid(s) to be stored in each tank. If it is expected that a tank may store a variety of hydrocarbon liquids, enter "mixed hydrocarbons" in the Composition column for that tank and enter the corresponding data of the most volatile liquid to be stored in the tank. If tank is to be used for storage of different materials, list all the materials in the "All Calculations" attachment, run the newest version of TANKS on each, and use the material with the highest emission rate to determine maximum uncontrolled and requested allowable emissions rate. The permit will specify the most volatile category of liquids that may be stored in each tank. Include appropriate tank-flashing modeling input data. Use additional sheets if necessary. Unit and stack numbering must correspond throughout the application

					Vapor	Average Stor	age Conditions	Max Stora	ge Conditions
Tank No.	SCC Code	Material Name	Composition	Liquid Density (lb/gal)	Molecular Weight (lb/lb*mol)	Temperature (°F)	True Vapor Pressure (psia)	Temperature (°F)	True Vapor Pressure (psia)
T-1	40400313	Waste Water	Water; <1% hydrocarbon liquids	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-2	40400313	Used Oil	Used Lubrication Oil	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-3	40400313	Lubrication Oil	Lubrication Oil	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-5 - T-17 (each)	40400313	Lubrication Oil	Used Lubrication Oil	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-18 - T-21 (each)	40705218	Glycol	Triethylene Glycol (TEG)	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-22 - T-25 (each)	40705218	Glycol	Triethylene Glycol (TEG)	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-26	40700816	Methanol	Methanol	6.6	32.04	58.54	1.3769	65.66	1.7198
T-27		Solvent	Jet kerosene	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-28	40705218	Glycol	Triethylene Glycol (TEG)	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-29	31000299	Antifreeze	Triethylene Glycol (TEG)	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-30 - T-33 (each)	40400313	Lubrication Oil	Lubrication Oil	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-34 - T-35 (each)	40705218	Glycol	Triethylene Glycol (TEG)	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-36 - T-37 (each)	40705218	Glycol	Triethylene Glycol (TEG)	Insignifica	nt source under Ir	nsignificant Activ	ites List, Item No.	5 (Vapor pressur	re < 10 mm Hg)
T-38 - T-37 (each)	40400315	Produced Water	Produced water w/trace of hydrocarbons	8.3	N/A*	N/A*	N/A*	N/A*	N/A*
T40	40400315	Produced Water	Produced water w/trace of hydrocarbons	8.3	N/A*	N/A*	N/A*	N/A*	N/A*
					* N/A: The emi	ssion calculations	do not yield this d	lata.	

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#### Table 2-L: Tank Data

Include appropriate tank-flashing modeling input data. Use an addendum to this table for unlisted data categories. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary. See reference Table 2-L2. Note: 1.00 bbl = 10.159 M3 = 42.0 gal

Tank No.	Date Installed	Materials Stored	Seal Type (refer to Table 2- LR below)	Roof Type (refer to Table 2-LR below)	Сар	acity	Diameter (M)	Vapor Space		olor ble VI-C)	Paint Condition (from Table VI	Annual Throughput	Turn- overs
			LK below)	LK below)	(bbl)	(M <sup>3</sup> )	` ′	(M)	Roof	Shell	C)	(gal/yr)	(per year)
T-1		Waste Water	N/A	FX	165.0	26.2	Insignificant	source under I	nsignificant .	Activites List	, Item No. 5 (	Vapor pressure < 1	0 mm Hg)
T-2		Used Oil	N/A	FX	165	26.2	Insignificant source under Insignificant Activites List, Item No. 5 (Vapor pressure < 10 mm Hg)						
T-3		Lubrication Oil	N/A	FX	100	15.9	Insignificant	t source under I	nsignificant .	Activites List	, Item No. 5 (	Vapor pressure < 1	0 mm Hg)
T-5 - T-17 (each)		Lubrication Oil	N/A	FX	11.9	1.9	Insignificant	t source under I	nsignificant .	Activites List	, Item No. 5 (	Vapor pressure < 1	0 mm Hg)
T-18 - T-21 (each)		Glycol	N/A	FX	2.4	0.4							0 mm Hg)
T-22 - T-25 (each)		Glycol	N/A	FX	1.2	0.2	0.2 Insignificant source under Insignificant Activites List, Item No. 5 (Vapor pressure < 10 mm Hg)						0 mm Hg)
T-26		Methanol	N/A	FX	11.9	1.9	.9 1.3716 0.9287 WH WH G 6,000 12.0						12.0
T-27		Solvent	N/A	FX	11.9	1.9	9 Insignificant source under Insignificant Activites List, Item No. 5 (Vapor pressure < 10 mm Hg)						
T-28		Glycol	N/A	FX	11.9	1.9	Insignificant	t source under I	nsignificant .	Activites List	, Item No. 5 (	Vapor pressure < 1	0 mm Hg)
T-29		Antifreeze	N/A	FX	11.9	1.9	Insignificant	t source under I	nsignificant.	Activites List	, Item No. 5 (	Vapor pressure < 1	0 mm Hg)
T-30 - T-33 (each)		Lubrication Oil	N/A	FX	11.9	1.9	Insignificant	t source under I	nsignificant .	Activites List	, Item No. 5 (	Vapor pressure < 1	0 mm Hg)
T-34 - T-35 (each)		Glycol	N/A	FX	2.4	0.4	Insignificant	t source under I	nsignificant .	Activites List	, Item No. 5 (	Vapor pressure < 1	0 mm Hg)
T-36 - T-37 (each)		Glycol	N/A	FX	1.2	0.2	Insignificant	t source under I	nsignificant .	Activites List	, Item No. 5 (	Vapor pressure < 1	0 mm Hg)
T-38 - T-39 (each)		Produced Water	N/A	FX	300	48	N/A*	N/A*	N/A*	N/A*	N/A*	1,302,000	N/A*
T40		Produced Water	N/A	FX	500	79	N/A*	N/A*	N/A*	N/A*	N/A*	with 'T-38 - T-39'	N/A*
							* N/A: The emission calculations do not yield this data.						

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# **Table 2-L2: Liquid Storage Tank Data Codes Reference Table**

Roof Type	Seal Type, W	elded Tank Seal Type		eted Tank Seal Type	Roof, Shell Color	Paint Condition
FX: Fixed Roof	Mechanical Shoe Seal	Liquid-mounted resilient seal	Vapor-mounted resilient seal	Seal Type	WH: White	Good
IF: Internal Floating Roof	A: Primary only	A: Primary only	A: Primary only	A: Mechanical shoe, primary only	AS: Aluminum (specular)	Poor
EF: External Floating Roof	B: Shoe-mounted secondary	B: Weather shield	B: Weather shield	B: Shoe-mounted secondary	AD: Aluminum (diffuse)	
P: Pressure	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	LG: Light Gray	
					MG: Medium Gray	
Note: 1.00 bbl = 0.159 M	$1^3 = 42.0 \text{ gal}$				BL: Black	
					OT: Other (specify)	

Table 2-M: Materials Processed and Produced (Use additional sheets as necessary.)

			Toeessea ana TToaue	(Use additional sheets as necessary	-)		
	Materi	al Processed			Material Produced		
Description	Chemical Composition	Phase (Gas, Liquid, or Solid)	Quantity (specify units)	Description	Chemical Composition	Phase	Quantity (specify units)
Low pressure natural gas	C1-C6+	Gas	57,380 mmcfy <sup>1</sup>	High pressure natural gas	C1-C6+	Gas	57,380 mmcfy <sup>1</sup>
Produced water	H2O + trace of HC	Liquid	1,302,000 gal/yr	Produced water	H2O + trace of HC	Liquid	1,302,000 gal/yr
		ect function of available horsepower. factors. The values expressed above					
nominai amount.							

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# **Table 2-N: CEM Equipment**

Enter Continuous Emissions Measurement (CEM) Data in this table. If CEM data will be used as part of a federally enforceable permit condition, or used to satisfy the requirements of a state or federal regulation, include a copy of the CEM's manufacturer specification sheet in the Information Used to Determine Emissions attachment. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

Stack No.	Pollutant(s)	Manufacturer	Model No.	Serial No.	Sample Frequency	Averaging Time	Range	Sensitivity	Accuracy
N/A									

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# **Table 2-O: Parametric Emissions Measurement Equipment**

Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

Unit No.	Parameter/Pollutant Measured	Location of Measurement	Unit of Measure	Acceptable Range	Frequency of Maintenance	Nature of Maintenance	Method of Recording	Averaging Time
N/A								

#### **Table 2-P:** Green House Gas Emissions

Applications submitted under 20.2.70, 20.2.72, & 20.2.74 NMAC are required to complete this Table. Power plants, Title V major sources, and PSD major sources must report and calculate all GHG emissions for each unit.

Applicants must report potential emission rates in short tons per year (see Section 6.a for assistance). Include GHG emissions during Startup, Shutdown, and Scheduled Maintenance in this table. For minor source facilities that are not power plants, are not Title V, or are not PSD, there are three options for reporting GHGs 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHG as a second separate unit; OR 3) check the following box:

By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

Unit No.		CO <sub>2</sub> ton/yr	N <sub>2</sub> O ton/yr	CH <sub>4</sub> ton/yr	SF <sub>6</sub> ton/yr	PFC/HFC ton/yr²					<b>Total GHG</b> Mass Basis ton/yr <sup>4</sup>	Total CO <sub>2</sub> e ton/yr <sup>5</sup>
Unit No.	GWPs 1	1	298	25	22,800	footnote 3						
1	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
1	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
2	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
2	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
2	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
3	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
4	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
4	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
-	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
5	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
6	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
7	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
,	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
8	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
8	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
13	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
13	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
15	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
13	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
16	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
10	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
18	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
10	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
19	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
1)	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7
20	mass GHG	6010.45	1.13E-02	0.11							6010.6	-
20	CO <sub>2</sub> e	6010.45	3.4	2.8							-	6016.7

rai rest i oui	Corners, EEC						 32 / CDI	 	 	 	ct. 2017, 1ct. 0
Unit No.		CO <sub>2</sub> ton/yr	N <sub>2</sub> O ton/yr	CH <sub>4</sub> ton/yr	SF <sub>6</sub> ton/yr	PFC/HFC ton/yr²				Total GHG Mas Basis ton/yr	
Unit No.	GWPs 1	1	298	25	22,800	footnote 3					
21	mass GHG	6010.45	1.13E-02	0.11						6010.6	-
21	CO <sub>2</sub> e	6010.45	3.4	2.8						-	6016.7
22	mass GHG	6010.45	1.13E-02	0.11						6010.6	-
22	CO <sub>2</sub> e	6010.45	3.4	2.8						-	6016.7
23	mass GHG	6010.45	1.13E-02	0.11						6010.6	-
23	CO <sub>2</sub> e	6010.45	3.4	2.8						-	6016.7
CCM	mass GHG	206.58	-	1076.04						1282.6	-
SSM	CO <sub>2</sub> e	206.6	-	26901.0						-	27107.6
0-	mass GHG	66.6	-	159.23						225.8	-
9a	CO <sub>2</sub> e	66.6	-	3980.6						-	4047.2
01	mass GHG	617.6	1.16E-03	1.16E-02						617.6	-
9b	CO <sub>2</sub> e	617.6	0.3	0.3						-	618.3
1.0	mass GHG	66.6	-	159.23						225.8	-
10a	CO <sub>2</sub> e	66.6	-	3980.6						-	4047.2
101	mass GHG	617.6	1.16E-03	1.16E-02						617.6	-
10b	CO <sub>2</sub> e	617.6	0.3	0.3						-	618.3
1.1	mass GHG	66.40	-	160.48						226.9	-
11a	CO <sub>2</sub> e	66.4	-	4012.1						-	4078.5
1.11	mass GHG	842.6	1.59E-03	1.59E-02						842.6	-
11b	CO <sub>2</sub> e	842.6	0.5	0.4						-	843.5
1.0	mass GHG	66.40	-	160.48						226.9	-
12a	CO <sub>2</sub> e	66.4	-	4012.1						-	4078.5
101	mass GHG	842.6	1.59E-03	1.59E-02						842.6	-
12b	CO <sub>2</sub> e	842.6	0.5	0.4						-	843.5
2.4	mass GHG	66.40	-	160.48						226.9	-
24a	CO <sub>2</sub> e	66.4	-	4012.1						-	4078.5
2.41	mass GHG	842.6	1.59E-03	1.59E-02						842.6	-
24b	CO <sub>2</sub> e	842.6	0.5	0.4						-	843.5
25	mass GHG	66.40	-	160.48						226.9	-
25a	CO <sub>2</sub> e	66.4	-	4012.1						-	4078.5
2.51	mass GHG	842.6	1.59E-03	1.59E-02						842.6	-
25b	CO <sub>2</sub> e	842.6	0.5	0.4						-	843.5

	-											,
Unit No.		CO <sub>2</sub> ton/yr	N <sub>2</sub> O ton/yr	CH <sub>4</sub> ton/yr	SF <sub>6</sub> ton/yr	PFC/HFC ton/yr²					Total GHG Mass Basis ton/yr <sup>4</sup>	Total CO <sub>2</sub> e ton/yr <sup>5</sup>
Unit No.	GWPs 1	1	298	25	22,800	footnote 3						
M-1	mass GHG	1881.25	-	9798.92							11680.2	-
IVI-1	CO <sub>2</sub> e	1881.3	-	244973.0							-	246854.2
Storage	mass GHG	0	-	0							0.0	-
Tanks	CO <sub>2</sub> e	0	-	0							-	0.0
L-1	mass GHG	0	-	0							0.0	-
L-1	CO <sub>2</sub> e	0	-	0							-	0.0
F-1	mass GHG	7.51	-	39.18							46.7	-
r-1	CO <sub>2</sub> e	7.5	-	979.5							-	987.0
Recip	mass GHG	196.97	-	1027.55							1224.5	-
Comp Venting	CO <sub>2</sub> e	197.0	-	25688.8							-	25885.7
Pneum Dev	mass GHG	40.08	-	208.59							248.7	-
Venting	CO <sub>2</sub> e	40.1	-	5214.8							-	5254.8
Pneum Pump	mass GHG	0.44	-	2.29							2.7	-
Venting	CO <sub>2</sub> e	0.44	-	57.3							-	57.7
	mass GHG										0.0	-
	CO <sub>2</sub> e										-	0.0
m . 16	mass GHG	109,515.0	0.20	13,114.97							122,630	-
Total <sup>6</sup>	CO <sub>2</sub> e	109,515.0	59.97	########							-	437,449

<sup>1</sup> GWP (Global Warming Potential): Applicants must use the most current GWPs codified in Table A-1 of 40 CFR part 98. GWPs are subject to change, therefore, applicants need to check 40 CFR 98 to confirm GWP values.

<sup>&</sup>lt;sup>2</sup> For HFCs or PFCs describe the specific HFC or PFC compound and use a separate column for each individual compound.

<sup>&</sup>lt;sup>3</sup> For each new compound, enter the appropriate GWP for each HFC or PFC compound from Table A-1 in 40 CFR 98.

<sup>&</sup>lt;sup>4</sup> Green house gas emissions on a **mass basis** is the ton per year green house gas emission before adjustment with its GWP.

<sup>&</sup>lt;sup>5</sup> CO<sub>2</sub>e means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the green house gas by its GWP.

<sup>&</sup>lt;sup>5</sup> The increase in mass GHG and CO2e compared to previous permit applications is based on higher methane and lower VOC content of the updated gas sample. (The gas GHG content fluctuates over time.)

# **Section 3**

# **Application Summary**

\_\_\_\_\_\_

The <u>Application Summary</u> shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

The **Process Summary** shall include a brief description of the facility and its processes.

<u>Startup, Shutdown, and Maintenance (SSM)</u> routine or predictable emissions: Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app\_form.html) for more detailed instructions on SSM emissions.

The Harvest Four Corners, LLC (Harvest) – 32-7 Central Delivery Point (32-7 CDP) is submitting this air quality permit application to the New Mexico Air Quality Bureau (NMAQB) for a modification to its Title V Operating Permit P195-R3, issued January 31, 2018, as administratively revised in P195-R3-M1 to reflect a change in company ownership. The facility is a production gathering field compressor station that pressurizes and dehydrates natural gas for transport through natural gas pipelines.

On October 11, 2018, the NMAQB issued construction permit 1032-M9 for the 32-7 CDP, which authorized the removal of an insignificant produced water storage tank (unit T4) concurrent with the addition of two 300-barrel (bbl) produced water storage tanks (units T38 and T39) and one 500-bbl produced water storage tank (unit T40).

Following the issuance of construction permit 1032-M9, the facility underwent a change in ownership, from Williams Four Corners LLC to its new owner, Harvest Four Corners, LLC (Harvest), which was incorporated into the construction permit in revision 1032-M9-R1 (December 19, 2018).

For Title V purposes, the facility is considered to have "commenced operation" on the date of issuance of the modified construction permit (October 11, 2018). Under 20.2.70.404.C(3)(b) of the New Mexico Administrative Code (NMAC), a complete application to modify the Operating Permit must be filed within 12 months of commencing operation under a revised [New Source Review (NSR)] construction permit (i.e., permit 1032-M9). Therefore, Harvest is submitting this application to modify its Title V Operating Permit.

The 32-9 CDP Operating Permit currently includes:

• Six (6) uncontrolled Waukesha 7042 GL compressor engines, units 1 through 6;

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- Eleven (11) controlled Waukesha 7042 GL compressor engines, units 7, 8, 13, 15, 16, and 18 through 23;
- Two (2) 12 mmcfd TEG dehydrators, units 9a/b and 10a/b;
- Four (4) 20 million cubic feet per day (mmcfd) triethylene glycol (TEG) dehydrators, units 11a/b, 12a/b, 24/b, and 25a/b;
- Compressor and piping blowdown emissions of volatile organic compounds (VOC) associated with to startups, shutdowns and maintenance;
- Fugitive emissions of VOC from process piping leaks (valves, flanges, seals, etc.), unit F-1; and
- Up to 10 tons per year of VOC emissions from malfunctions (unit M-1).

Unregulated/insignificant emission sources at the facility include insignificant storage tanks and produced water truck loading activities (unit L-1). The regulatory justification for their insignificance is noted in Table 2-B of the application. Insignificance based on the NMAQB Operating Permit Program List of Insignificant Activities, Item #1 (i.e., emissions less than 1 ton per year (tpy)) is demonstrated through emission calculations provided in Section 6.

The 32-7 CDP is authorized to operate continuously.

Consistent the current Construction permit (1032-M9), this application requests the following changes to Operating Permit P195-R3:

- Remove one insignificant 150 barrel (bbl) produced water storage tank, unit T4;
- Add two 300 bbl produced water storage tanks, units T38 & T39; and
- <u>Add</u> one 500 bbl produced water storage tank, unit T40.

The combined emissions from the three produced water storage tanks are regulated as a single aggregated emission source source. The VOC emissions from the produced water tanks is greater than 1 ton per year, therefore it is a 'significant' source under the Title V Operating Permits Program.

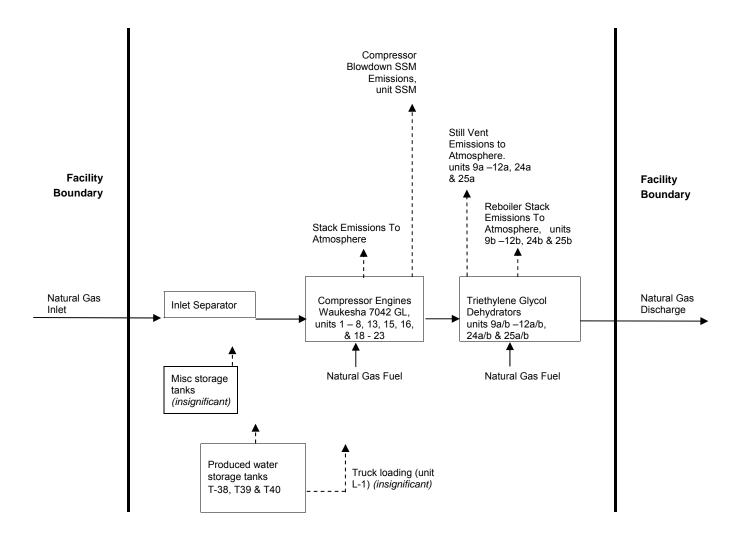
The facility remains a minor source under the 20.2.74 NMAC Prevention of Significant Deterioration (PSD) program.

The facility is an area source of Hazardous Air Pollutants (HAP) under 40 CFR 63, subpart HH, *National Emission Standards for Hazardous Air Pollutants [NESHAP] for Oil and Gas Production Facilities*; and a major source of HAP as defined under 40 CFR 63, subpart ZZZZ, *NESHAP for Stationary Reciprocating Internal Combustion Engines*.

# **Section 4**

# **Process Flow Sheet**

A **process flow sheet** and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.



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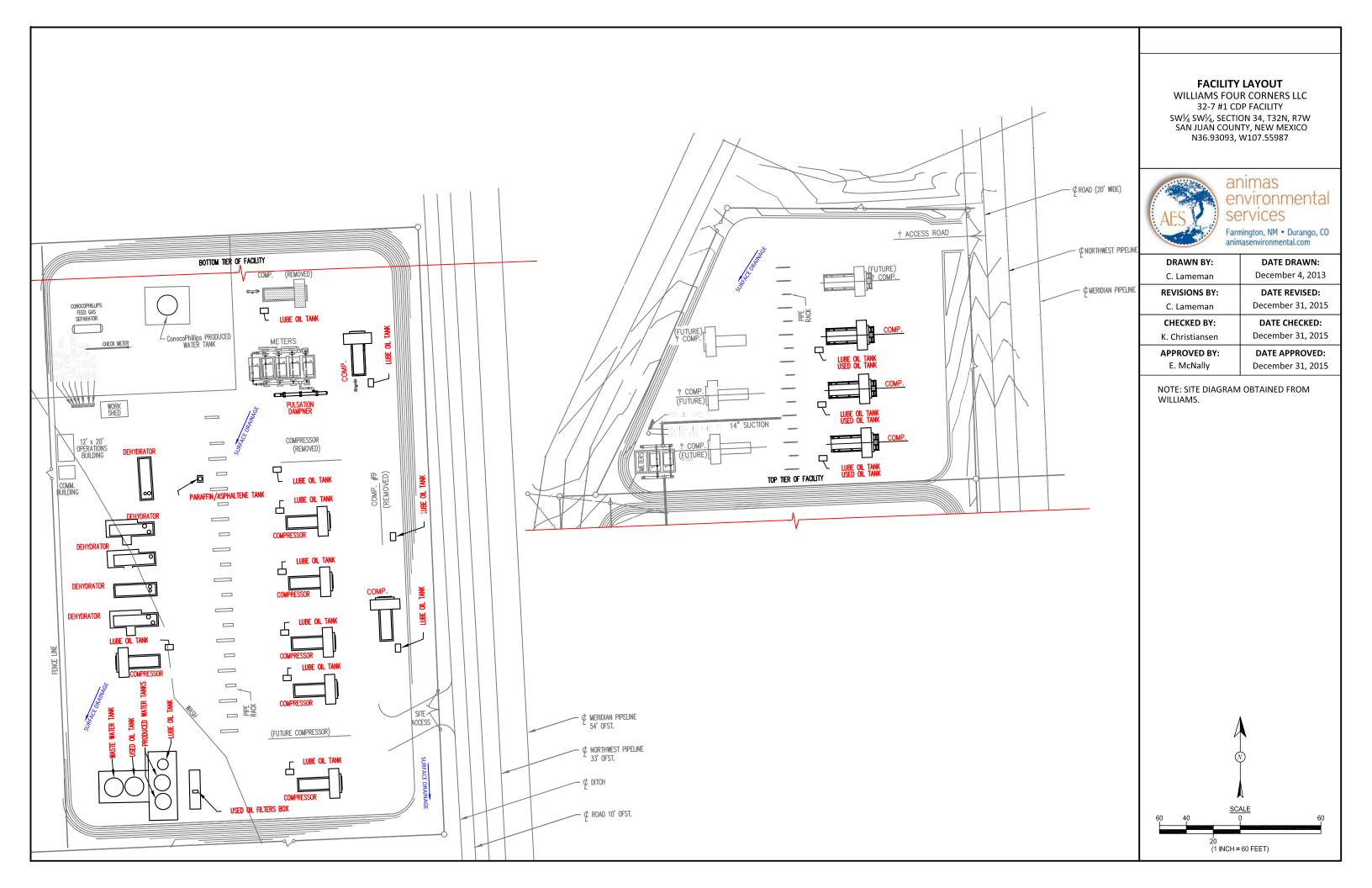
# **Section 5**

# Plot Plan Drawn To Scale

A <u>plot plan drawn to scale</u> showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

Please see the following page(s).

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# **Section 6**

# **All Calculations**

Show all calculations used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

Tank Flashing Calculations: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

**SSM Calculations**: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app\_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowables Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

**Glycol Dehydrator Calculations**: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

**Road Calculations:** Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

- 1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
- 2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

#### **Significant Figures:**

**A.** All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.

- **B.** At least 5 significant figures shall be retained in all intermediate calculations.
- **C.** In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:
  - (1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
  - (2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; and
  - (3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
  - (4) The final result of the calculation shall be expressed in the units of the standard.

**Control Devices:** In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device

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regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

# Reciprocating Engines

Emissions of nitrogen oxides (NO<sub>X</sub>), carbon monoxide (CO) and volatile organic compound (VOC) emissions from the Waukesha 7042GL engines, units 1 through 8, 13, 15, 16, and 18 through 23, are calculated from engine manufacturer's data and the site-rated horsepower (hp) rating of the engine. The CO and VOC emissions from the uncontrolled engines (Units 1 through 6) are calculated based on Waukesha engine manufacturer's data. The reduced CO and VOC emissions from the engines equipped with emission controls (units 7, 8, 13, 15, 16, and 18 through 23) are based on Waukesha Pearce emission factors (or equivalent) for controlled engines, respectively. (Note that the control efficiencies on the unit 13 engine are intentionally different from the other units, having been permitted at a different time from the other controlled units.) The catalytic converters oxidize emissions of CO and VOC. NO<sub>X</sub> emissions are not controlled by catalytic converters on 4-stroke, lean burn engines. Emissions of sulfur dioxide (SO<sub>2</sub>) and particulate emissions are calculated from AP-42, Table 3.2-2 emission factors and the maximum fuel use. Uncontrolled hazardous air pollutants (HAPs) from the RICE are calculated with the GRI-HAPCalc 3.1 emissions estimation software. The emission calculations assume operation at full site capacity for 8,760 hours per year. The Waukesha Pearce emission factor for controlled VOC (79% control efficiency) is applied to the uncontrolled HAP emissions.

Each of the engines starts up with no load and a rich fuel mixture. As a result, emissions are minimized. Because the engine takes only minutes to reach the operating temperature of the engine and effective temperature of the catalytic converter, emissions during startup are not expected to exceed the steady-state allowable emission rate limits. There are no Environmental Protection Agency (EPA)-approved test methods available to measure emissions during startup.

Similarly, emissions during shut down do not exceed the steady-state allowable limits because fuel and air flow cease within seconds of shutdown. Emissions due to scheduled maintenance are negligible, as the engine is not in operation during maintenance.

The criteria pollutant emission calculations and GRI-HAPCalc 3.0 output file calculations are provided in this section.

# Triethylene Glycol (TEG) Dehydrator Still Vents and Reboilers

A triethylene glycol (TEG) dehydration units can be considered to consist of two emission units, a dehydrator still vent, and a dehydrator reboiler that is a small heater combustion source that provides heat

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to regenerate the rich TEG back to lean TEG. Therefore, the TEG dehydrator unit identification numbers have been divided into 'a' and 'b' sub-units to differentiate the dehydrator still vents (units 9a through 12a, 24a, and 25a) from the dehydrator reboilers (units 9b through 12b, 24b, and 25b). The TEG dehydrators are permitted to operate continuously.

The Potential To Emit (PTE) of VOC and HAP from the dehydrator still vents are calculated with GRI-GLYCalc 4.0 emission estimation software using a facility inlet extended natural gas analysis sampled on June 19, 2018, the maximum daily dehydrator gas throughput, and the maximum allowed glycol pump rate as input. The emission calculations assume operation at full capacity for 8,760 hours per year. The results of the GLYCalc analysis show that the calculated emissions are well below the current permitted levels for VOC. Harvest does not seek any changes to the currently permitted emissions to the units 9a, 10a, 11a, 12a, 24a, or 25a dehydrator still vent emissions. Accordingly, the requested allowable emissions in Table 2-E are carried forward from the existing permit.

Emissions of NO<sub>X</sub>, CO, VOC and SO<sub>2</sub> from the reboilers (units 9b through 12b, 24b, and 25b) are calculated using Enertek and Infab manufacturer emission factors. Particulate emissions are calculated using AP-42 emission factors from Table 1.4-2. HAP emissions from the reboilers are calculated using GRI-HAPCalc 3.0 and the rated heat capacities of the reboilers.

During startup, the dehydrator reboiler is brought up to temperature before allowing glycol into the absorber. This prevents excess VOC and HAP from collecting in the glycol stream, and there are no excess startup emissions above those expected during steady-state operation. During shutdown, the reboiler is shut down in conjunction with the gas flow and glycol circulation. Again, this prevents excess VOC and HAP from collecting in the glycol stream, and there are no excess shutdown emissions above those expected during steady-state operation. Emissions due to scheduled maintenance are negligible; either the unit will not be in operation during maintenance, or maintenance is limited to tasks for which there are no excess emissions.

The GLYCalc input and output files, reboiler spreadsheet calculations, and HAPCalc output files are provided in this section.

# Startup, Shutdown & Routine Maintenance (SSM) Emissions

Emissions associated with startups, shutdowns and routine maintenance (SSM) from the compressors and piping are vented to the atmosphere. SSM emissions from a compressor occur when high pressure gas is used to purge air from the compressor and associated piping prior to a startup. This gas is then vented to atmosphere. Also, after shutdowns, high pressure gas in the compressor(s) and associated piping is released to atmosphere as a safety precaution.

One common reason for compressor startups and shutdowns is a change in the amount of compression required from the station due to fluctuations in the pipeline. To prolong the life of equipment and reduce

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engine emissions, the compressors are shutdown when not needed. It is "routine or predictable" that the compressors at the station will come on-line and drop off-line many times during the course of operation. It is also standard industry practice.

The compressor is also shut down for maintenance of the engine, compressor or other equipment at the station. This maintenance is scheduled based on time in service and/or monitoring of equipment (visual and automated) in accordance with company and standard industry practice. This maintenance is also "routine or predictable".

The VOC and HAP emissions from blowdown of the compressors and piping associated with the facility are calculated from the composition of the natural gas, the quantity of gas vented during each event, and the estimated number of annual events. The composition of the natural gas is based on the extended gas analysis described above. The quantity of gas vented during each event is determined by Harvest engineering. The annual number of blowdown events for the compressors are estimated based on historical data. A safety factor is added because VOC and HAP emissions from each blowdown event are dependent on the composition of the gas in the pipeline, and because the annual number of blowdowns may vary. Experience indicates the composition of the gas is also likely to vary. The use of the safety factor is also designed to ensure an adequate emissions limit, which includes any emissions from other non-blowdown miscellaneous startup, shutdown and maintenance activities.

The SSM emissions identified in this application are routine or predictable startup, shutdown and/or scheduled maintenance, and do not include malfunctions or upsets. <u>Harvest does not seek any changes to the currently permitted SSM emissions</u>. *Accordingly, the requested allowable emissions in Table 2-E are carried forward from the existing permit*.

SSM emission calculations are provided in this section.

# Fugitive Emissions

Fugitive emissions of VOC and HAP from equipment leaks (Unit F-1) are calculated using emission factors from Table 2.4 of the 1995 Protocol for Equipment Leak Emission Estimates published by the Environmental Protection Agency (EPA), equipment counts from Harvest, and the gas stream composition obtained from the extended gas analysis. The HAP components of the natural gas are derived from the species molar percentages in the natural gas. Due to the nature of the source, it is estimated that SSM emissions from valves, connectors, seals, etc. are accounted for in the calculations.

The results of the emission calculations using the June 19, 2018 extended gas analysis indicate that the calculated emissions are well below the current permitted levels for VOC. <u>Harvest does not seek any changes to the currently permitted fugitive emissions (unit F-1)</u>. *Accordingly, the requested allowable emissions in Table 2-E are carried forward from the existing permit.* 

The emission calculations are provided in this section.

# **Produced Water Storage Tanks**

The aggregated VOC and HAP emissions from the units T-38, T-39, and T-40 produced water storage tanks (two 300-barrel (bbl) and one 500-bbl, respectively) are calculated by selecting the most conservative emission factors from the Colorado Department of Public Health and Environment (CDPHE) February 8, 2010 PS Memo 09-02 "Oil and Gas Produced Water Tank Batteries Regulatory Definitions and Guidance" and the Texas Commission on Environmental Quality (TCEQ) August 2010 project "Emission Factor Determination for Produced Water Storage Tanks", and the maximum annual facility-wide produced water throughput. The aggregated emissions of VOC exceed 1 tpy; therefore, the aggregated emissions from produced water tank units T-38, T-39, and T-40 are a significant source under Title V. The aggregated storage tanks are added to the application Table 2-A, Regulated Emission Sources.

# Produced Water Truck Loading Emissions (Insignficant)

Emissions of VOC and HAP from produced water truck loading activities (unit L-1) are estimated using emission factors from AP-42 Section 5.2, *Truck Loading* and the estimated maximum annual facility throughput of produced water. The emission calculations assume submerged loading during transfer operations. The HAPs are calculated from the weight ratios of the CDPHE/TCEQ produced water emission factors of HAP to VOC (lb/bbl HAP / lb/bbl VOC), and applied to the truck loading pph and tpy VOC emission rates. Based on a calculated PTE of less than 1 tpy for any regulated air pollutant, the produced water truck loading emissions are an insignificant emission source under the Insignificant Activities List, Item No. 1.

# Insignificant Storage Tanks

Except for the aggregated emissions from the produced water tanks, all of the storage tanks at the 32-7 CDP are considered insignificant sources under NMAQB's *Operating Permit Program List of Insignificant Activities* (March 24, 2005).

The only tank with insignificance that is based on emissions less than 1 ton per year (Insignificant Activity List Item #1) is the 500-gallon methanol storage tank (unit T-26). Tank working/ breathing emissions of VOC are provided using the TANKS 4.09d emission calculation program and the TANKS speciation profile for methanol. The methanol emissions are well below 1 ton per year, and the HAP emissions are below the Clean Air Act (CAA) section 112(g) HAP de minimus values. Therefore, methanol storage tank T-26 is an insignificant source under the Title V Insignificant Activities List, Item 1.

The 165 bbl below-grade wastewater storage tank (unit T-1) is assumed to contain one percent (1%) Residual Oil #6 and 99 percent (99%) water. The vapor pressure of the hydrocarbon liquid component of the stored contents is well under 10 mm Hg ( $\approx 0.2$  psia), and therefore the wastewater storage tank is an insignificant under the Insignificant Activities List, Item No. 5.

Residual Oil #6 is used to approximate the stored contents of the lube oil storage tanks (units T3, T-5 through T-17, and T-30 through T-33) and used oil tank (unit T-2). The residual oil liquid has a vapor pressure of less than 10 mm Hg ( $\approx$  0.2 psia); therefore, the lube oil and used oil storage tanks are insignificant under the Insignificant Activities List, Item No. 5.

The 500-, 100- and 50- gallon triethylene glycol (TEG) storage tanks (unit T-28; units T-34, T-35, T-18 through T-21, T-34 and T-35; and units T-22 through T-25, T-36 and T-37, respectively) contain TEG. The vapor pressure of TEG is less than 10 mm Hg ( $\approx 0.2$  psia); therefore, the TEG storage tanks are insignificant sources under Item No. 5 of the Insignificant Activities List.

The 500 gallon antifreeze storage tank (unit T-29) contains ethylene glycol (glycol) and water. The vapor pressure of ethylene glycol is less than 10 mm Hg ( $\approx 0.2$  psia); therefore, the antifreeze storage tank is an insignificant source under Item No. 5 of the Insignificant Activities List.

Jet kerosene is used to approximate the stored contents of the 500 gallon solvent storage tank (unit T-27). The jet kerosene has a vapor pressure of less than 10 mm Hg ( $\approx 0.2$  psia); therefore, the solvent storage tank is an insignificant source under Item No. 5 of the Insignificant Activities List.

There are no flash emissions associated with any of the storage tanks.

Due to the nature of the operations, startup and shutdown emissions from the storage tanks are assumed to be accounted for in the storage tank emission estimates. Emissions due to maintenance will be negligible as the units will not be in operation.

Copies of the TANKS 4.0.9d emission calculations for the produced water and methanol storage tanks are provided.

# Truck Loading Emissions (Insignificant)

Emissions of VOC and HAP from produced water truck loading activities (Unit L-1) are estimated using emission factors from AP-42 Section 5.2, *Truck Loading* and the estimated maximum annual facility throughput of produced water, equivalent to the throughput used in the TANKS emission calculation. The emission calculations assume submerged loading during transfer operations.

The HAP constituent percentages for the produced water truck loading are based on the speciated HAP vapor mass fractions from the TANKS output file.

Calculated emissions of VOC and HAPs from the produced water loading activities are well below 1 tpy; therefore, the Unit L-1 truck loading activities are insignificant under Item No. 1 of the Title V Insignificant Activities List.

The emission calculations are provided in this section.

# Malfunctions

Malfunction (unit M-1) emissions are set at 10 tons of VOC per year. Based on the gas release rate associated with the set emission rate, HAP emissions are estimated using the natural gas extended analysis described above.

The HAP calculations are provided in this section.

# **Engine Exhaust Emissions Calculations**

Unit Number: 1, 2, 3, 4, 5, 6, 7, 8, 15, 16, 18, 19, 20, 21, 22 & 23

Description: Waukesha L7042GL

Note: The data on this worksheet applies to each individual emissions unit identified above.

#### **Horsepower Calculations**

6,740 ft above MSL Elevation
1,478 hp Nameplate hp Mfg. data

1,357 hp NMAQB Site-rated hp NMAQB Procedure # 02.002-00

(loss of 3% for every 1,000 ft over 4,000 ft)

1,323 hp Mfg. Site-rated hp Mfg. product bulletin Power Derate,

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(loss of 2% for every 1,000 ft over 1,500 ft)

## **Engine Specifications**

1200 rpmEngine rpmMfg. data7040 cu inEngine displacementMfg. data

127.17 psi BMEP Mfg. data (+[(792,000 x NMAQB Site-rated hp)

/ (rpm \* in^3)])

#### **Fuel Consumption**

7380 Btu/hp-hr Brake specific fuel consumption Mfg. data

10.01 MMBtu/hr Hourly fuel consumption Btu/hp-hr x NMAQB site-rated hp / 1,000,000

11,123 scf/hr Hourly fuel consumption MMBtu/hr x 1,000,000 / Btu/scf

 8,760 hr/yr
 Annual operating time
 Harvest

 87,694 MMBtu/yr
 Annual fuel consumption
 MMBtu/hr x hr/yr

 97.44 MMscf/yr
 Annual fuel consumption
 scf/hr x hr/yr / 1,000,000

 900 Btu/scf
 Field gas heating value
 Nominal heat content

#### Steady-State Emission Rates

Pollutants	Emission Factors,	Uncontrolled Emission Rates (Units 1 - 6)		Control Efficiency		mission Rates i, 16, & 18 - 23)
	g/hp-hr	pph	tpy		pph	tpy
NOX	0.90	2.69	11.79	0%	2.69	11.79
CO	2.75	8.22	36.02	93%	0.58	2.52
VOC	1.00	2.99	13.10	79%	0.63	2.75

NO<sub>X</sub>, CO & VOC emissions taken from Waukesha Bulletin 7005 0102

Uncontrolled Emission Rates (pph) = g/hp-hr x NMAQB Site-rated hp / 453.59 g/lb

Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr / 2,000 lb/ton

Control efficiencies taken based on catalyst manufacturer data sheet.

Controlled Emission Rates (pph) = Uncontrolled Emission Rates (pph) x (1 - (% / 100))

Controlled Emission Rates (tpy) = Uncontrolled Emission Rates (tpy) x (1 - (% / 100))

	Emission		
Pollutants	Factors,	Uncontrolled E	mission Rates,
	lb/MMBtu	pph	tpy
SO2	5.88E-04	5.89E-03	2.58E-02
PM	9.99E-03	1.00E-01	4.38E-01
PM10	9.99E-03	1.00E-01	4.38E-01
PM2.5	9.99E-03	1.00E-01	4.38E-01

Emission factors taken from AP-42, Table 3.2-2

Particulate factors include both filterable and condensible emissions

Uncontrolled Emission Rates (pph) = lb/MMBtu x MMBtu/hr

Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr / 2,000 lb/ton

#### **Exhaust Parameters**

701 °FStack exit temperatureMfg. data7550 acfmStack flowrateMfg. data1.02 ftStack exit diameterHarvest

0.82 ft $^{\circ}$ 2 Stack exit area 3.1416 x ((ft / 2)  $^{\circ}$ 2) 153.7 fps Stack exit velocity acfm / ft $^{\circ}$ 2 / 60 sec/min

22.00 ft Stack height Harvest

# **Engine Exhaust Emissions Calculations**

Unit Number: 13

Description: Waukesha L7042GL

Note: The data on this worksheet applies to each individual emissions unit identified above.

#### **Horsepower Calculations**

6,740 ft above MSL Elevation
1,478 hp Nameplate hp Mfg. data

1,357 hp NMAQB Site-rated hp NMAQB Procedure # 02.002-00

(loss of 3% for every 1,000 ft over 4,000 ft)

1,323 hp Mfg. Site-rated hp Mfg. product bulletin Power Derate,

S8154-6, April 2001

(loss of 2% for every 1,000 ft over 1,500 ft)

**Engine Specifications** 

1200 rpmEngine rpmMfg. data7040 cu inEngine displacementMfg. data

127.17 psi BMEP Mfg. data (+[(792,000 x NMAQB Site-rated hp)

/ (rpm \* in^3)])

**Fuel Consumption** 

7380 Btu/hp-hr Brake specific fuel consumption Mfg. data

10.01 MMBtu/hr Hourly fuel consumption Btu/hp-hr x NMAQB site-rated hp / 1,000,000

11,123 scf/hr Hourly fuel consumption MMBtu/hr x 1,000,000 / Btu/scf

 8,760 hr/yr
 Annual operating time
 Harvest

 87,694 MMBtu/yr
 Annual fuel consumption
 MMBtu/hr x hr/yr

 97.44 MMscf/yr
 Annual fuel consumption
 scf/hr x hr/yr / 1,000,000

 900 Btu/scf
 Field gas heating value
 Nominal heat content

#### Steady-State Emission Rates

Pollutants	Emission Factors,	Uncontrolled E	mission Rates	Control Efficiency		mission Rates it 13)
	g/hp-hr	pph	tpy		pph	tpy
NOX	0.90	2.69	11.79	0%	2.69	11.79
CO	2.75	8.22	36.02	90%	0.82	3.60
VOC	1.00	2.99	13.10	80%	0.60	2.62

NO<sub>x</sub>, CO & VOC emissions taken from Waukesha Bulletin 7005 0102

Uncontrolled Emission Rates (pph) = g/hp-hr x NMAQB Site-rated hp / 453.59 g/lb

Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr / 2,000 lb/ton

Control efficiencies taken based on catalyst manufacturer data sheet.

Controlled Emission Rates (pph) = Uncontrolled Emission Rates (pph) x (1 - (% / 100))

Controlled Emission Rates (tpy) = Uncontrolled Emission Rates (tpy) x (1 - (% / 100))

	Emission		
Pollutants	Factors,	Uncontrolled E	mission Rates,
	lb/MMBtu	pph	tpy
SO2	5.88E-04	5.89E-03	2.58E-02
PM	9.99E-03	1.00E-01	4.38E-01
PM10	9.99E-03	1.00E-01	4.38E-01
PM2.5	9.99E-03	1.00E-01	4.38E-01

Emission factors taken from AP-42, Table 3.2-2

Particulate factors include both filterable and condensible emissions

Uncontrolled Emission Rates (pph) = lb/MMBtu x MMBtu/hr

Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr / 2,000 lb/ton

# GRI-HAPCalc ® 3.01 Engines Report

Facility ID: 32-7 CDP Notes:

Operation Type: COMPRESSOR STATION

Facility Name: 32-7 CDP User Name: Cirrus

Units of Measure: U.S. STANDARD

 $Note:\ Emissions\ less\ than\ 5.00E-09\ tons\ (or\ tonnes)\ per\ year\ are\ considered\ insignificant\ and\ are\ treated\ as\ zero.$ 

These emissions are indicated on the report with a "0".

Emissions between 5.00E-09 and 5.00E-05 tons (or tonnes) per year are represented on the report with "0.0000".

**Engine Unit** 

Unit Name: 4SLB\_RICE

Hours of Operation: 8,760 Yearly Rate Power: 1,357 hp

Fuel Type: FIELD GAS

Engine Type: 4-Stroke, Lean Burn

Emission Factor Set: EPA > FIELD > LITERATURE

Additional EF Set: -NONE-

# **Calculated Emissions** (ton/yr)

<b>Chemical Name</b>	<b>Emissions</b>	Emission Factor	<b>Emission Factor Set</b>
<u>HAPs</u>			
Formaldehyde	2.2033	0.16830000 g/bhp-hr	GRI Literature
Benzene	0.0681	0.00520000 g/bhp-hr	GRI Literature
Toluene	0.0275	0.00210000 g/bhp-hr	GRI Literature
Xylenes(m,p,o)	0.0183	0.00140000 g/bhp-hr	GRI Literature
Total	2.3172		

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# **Compressor Blowdown Emissions Calculations**

Unit Number: SSM

Description: Compressor & Piping Associated With Station

#### **Throughput**

500 events/yr per compressorevents/yr per unitHarvest17 compressorscompressor unitsHarvest6,442 scf/eventGas loss per blowdownHarvest

54,757,000 scf/yr Total annual gas loss events/yr per unit x # of units x scf/event

#### **Emission Rates**

		Uncontrolled,	Uncontrolled,
	Emission	Emission	Emission
Pollutants	Factors,	Rates, tpy	Rates, tpy
	lb/scf	per unit	facility-wide
VOC	4.011E-05	0.06	1.10
2,2,4-Trimethylpentane	0.000E+00	0.00E+00	0.00E+00
Benzene	0.000E+00	0.00E+00	0.00E+00
Ethylbenzene	0.000E+00	0.00E+00	0.00E+00
n-Hexane	0.000E+00	0.00E+00	0.00E+00
Toluene	0.000E+00	0.00E+00	0.00E+00
Xylene	0.000E+00	0.00E+00	0.00E+00

(Not a requested permit limit.)

Emission factors calculated from gas composition (see table below)

 $Uncontrolled \ Emission \ Rates \ (tpy) \ per \ unit = (lb/scf \ x \ events/yr \ per \ compressor \ x \ scf/event) \ / \ 2,000 \ lb/ton$ 

Uncontrolled Emission Rates (tpy) facility-wide = (lb/scf x scf/yr) / 2,000 lb/ton

## **Gas Composition**

	Mole	Molecular	Emission
Components	Percents,	Weights,	Factors,
	%	lb/lb-mole	lb/scf
Carbon dioxide	6.5048	44.01	7.545E-03
Hydrogen sulfide	0.0000	34.07	0.000E+00
Nitrogen	0.0897	28.01	6.622E-05
Methane	92.9634	16.04	3.930E-02
Ethane	0.4137	30.07	3.279E-04
Propane	0.0159	44.09	1.848E-05
Isobutane	0.0041	58.12	6.281E-06
n-Butane	0.0022	58.12	3.370E-06
Isopentane	0.0054	72.15	1.027E-05
n-Pentane	0.0009	72.15	1.712E-06
Cyclopentane	0.0000	70.14	0.000E+00
n-Hexane	0.0000	86.17	0.000E+00
Cyclohexane	0.0000	84.16	0.000E+00
Other hexanes	0.0000	86.18	0.000E+00
Heptanes	0.0000	100.20	0.000E+00
Methylcyclohexane	0.0000	98.19	0.000E+00
2,2,4-Trimethylpentane	0.0000	100.21	0.000E+00
Benzene	0.0000	78.11	0.000E+00
Toluene	0.0000	92.14	0.000E+00
Ethylbenzene	0.0000	106.17	0.000E+00
Xylenes	0.0000	106.17	0.000E+00
C8+ Heavies	0.0000	110.00	0.000E+00
Total	100.0001		
Total VOC			4.011E-05

Gas stream composition obtained from the 32-7 CDP extended gas analysis dated June 19, 2018. Emission Factors (lb/scf) = (% / 100) x lb/lb-mole / 379.4 scf/lb-mole

## GRI-GLYCalc VERSION 4.0 - SUMMARY OF INPUT VALUES

Case Name: 32-7 EU 9a & 10a PTE (gas 2018-06-19)

File Name: C:\Users\user\Documents\Cirrus\Permit applications\New Mexico\Harvest Four Corners (formerly WFC)\0 032-7\TITLE V\2019-09 Sept Title V mod-incorp. NSR\Analyses &

bkgrnd info\GLYCalc\32-7 12 mm dehys PTE (gas 2018-06-19).ddf

Date: September 19, 2019

#### DESCRIPTION:

\_\_\_\_\_\_

Description: 32-7 EU 9 & 10 - 12 mmcfd dehys

PTE analysis for the 2019-Oct Title V

Modification Appl

6/19/2018 GAS ext. analysis & parameters

inc.flash tank temp & pressure

Annual Hours of Operation: 8760.0 hours/yr

WET GAS:

\_\_\_\_\_

Temperature: 93.00 deg. F
Pressure: 945.00 psig
Wet Gas Water Content: Saturated

Component	Conc. (vol %)
Carbon Dioxide	6.5048
Nitrogen	0.0897
Methane	92.9634
Ethane	0.4137
Propane	0.0159
Isobutane	0.0041
n-Butane	0.0076
n-Pentane	0.0009

DRY GAS:

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Flow Rate: 12.0 MMSCF/day Water Content: 7.0 lbs. H2O/MMSCF

LEAN GLYCOL:

Glycol Type: TEG

Water Content: 1.5 wt% H2O Flow Rate: 2.5 gpm

PUMP:

Glycol Pump Type: Gas Injection

Gas Injection Pump Volume Ratio: 0.080 acfm gas/gpm glycol

FLASH TANK:

Flash Control: Recycle/recompression
Temperature: 84.4 deg. F
Pressure: 48.8 psig

# GRI-GLYCalc VERSION 4.0 - AGGREGATE CALCULATIONS REPORT

Case Name: 32-7 EU 9a & 10a PTE (gas 2018-06-19)

File Name: C:\Users\user\Documents\Cirrus\Permit applications\New Mexico\Harvest Four Corners (formerly WFC)\0 032-7\TITLE V\2019-09 Sept Title V mod-incorp. NSR\Analyses & bkgrnd info\GLYCalc\32-7 12 mm dehys PTE (gas 2018-06-19).ddf

Date: September 19, 2019

#### DESCRIPTION:

Description: 32-7 EU 9 & 10 - 12 mmcfd dehys

PTE analysis for the 2019-Oct Title V

Modification Appl

6/19/2018 GAS ext. analysis & parameters

inc.flash tank temp & pressure

Annual Hours of Operation: 8760.0 hours/yr

#### EMISSIONS REPORTS:

#### UNCONTROLLED REGENERATOR EMISSIONS

Component	lbs/hr	lbs/day	tons/yr
Methan Ethan Propan Isobutan n-Butan	e 0.0119 e 0.0018 e 0.0012	6.742 0.286 0.044 0.028 0.079	1.2303 0.0522 0.0080 0.0051 0.0144
n-Pentan	e 0.0008	0.020	0.0036
Total Emission: Total Hydrocarbon Emission:		7.198 7.198	1.3136 1.3136
Total VOC Emission		0.171	0.0311 Post script:
FLASH GAS EMISSIONS			For compliand (Not a reques

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Note: Flash Gas Emissions are zero with the Recycle/recompression control option.

# FLASH TANK OFF GAS

Component	lbs/hr	lbs/day	tons/yr
Methane Ethane Propane Isobutane n-Butane	36.0720 0.3678 0.0233 0.0087 0.0177	865.727 8.828 0.559 0.209 0.426	157.9952 1.6111 0.1021 0.0381 0.0777
n-Pentane	0.0027	0.066	0.0120
Total Emissions	36.4923	875.815	159.8362
Total Hydrocarbon Emissions Total VOC Emissions	36.4923 0.0525	875.815 1.260	159.8362 0.2299

#### COMBINED REGENERATOR VENT/FLASH GAS EMISSIONS

Component	lbs/l	nr lbs/day	tons/yr
F Isc	Ethane 0.0 Propane 0.0 Obutane 0.0	2809 6.742 0119 0.286 0018 0.044 0012 0.028 0033 0.079	0.0522 0.0080 0.0051
n-F	entane 0.0	0.020	0.0036
Total Emi	ssions 0.2	2999 7.198	1.3136
Total Hydrocarbon Emi Total VOC Emi		2999 7.198 0071 0.171	

#### COMBINED REGENERATOR VENT/FLASH GAS EMISSION CONTROL REPORT:

Component	Uncontrolled tons/yr	Controlled tons/yr	% Reduction
Methane Ethane Propane Isobutane n-Butane	159.2256 1.6633 0.1101 0.0432 0.0921	1.2303 0.0522 0.0080 0.0051 0.0144	99.23 96.86 92.72 88.19 84.39
n-Pentane	0.0157	0.0036	76.85
Total Emissions	161.1498	1.3136	99.18
Total Hydrocarbon Emissions Total VOC Emissions	161.1498 0.2610	1.3136 0.0311	99.18 88.08

#### ABSORBER

NOTE: Because the Calculated Absorber Stages was below the minimum allowed, GRI-GLYCalc has set the number of Absorber Stages to 1.25 and has calculated a revised Dry Gas Dew Point.

> Calculated Absorber Stages: 1.25

2.41 lbs. H2O/MMSCF Calculated Dry Gas Dew Point:

> 93.0 a.j 945.0 psig 93.0 deg. F Temperature: Pressure:

Dry Gas Flow Rate: 12.0000 MMSCF/day Glycol Losses with Dry Gas: 0.1126 lb/hr

Wet Gas Water Content: Saturated

Calculated Wet Gas Water Content: 50.01 lbs. H2O/MMSCF Calculated Lean Glycol Recirc. Ratio: 6.30 gal/lb H20

> Remaining Absorbed in Dry Gas in Glycol Component

Water	4.81%	95.19%
Carbon Dioxide	99.71%	0.29%
Nitrogen	99.98%	0.02%
Methane	99.98%	0.02%
Ethane	99.93%	0.07%
Propane	99.89%	0.11%
Isobutane	99.85%	0.15%
n-Butane	99.80%	0.20%
n-Pentane	99.75%	0.25%

## FLASH TANK

\_\_\_\_\_\_

Flash Control: Recycle/recompression
Flash Temperature: 84.4 deg. F
Flash Pressure: 48.8 psig

Component	Left in Glycol	Removed in Flash Gas
Water	99.93%	0.07%
Carbon Dioxide	11.60%	88.40%
Nitrogen	0.74%	99.26%
Methane	0.77%	99.23%
Ethane	3.14%	96.86%
Propane	7.28%	92.72%
Isobutane	11.81%	88.19%
n-Butane	15.61%	84.39%
n-Pentane	23.39%	76.61%

#### REGENERATOR

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No Stripping Gas used in regenerator.

Component	Remaining in Glycol	Distilled Overhead
Water	46.96%	53.04%
Carbon Dioxide	0.00%	100.00%
Nitrogen	0.00%	100.00%
Methane	0.00%	100.00%
Ethane	0.00%	100.00%
Dropano	0.00%	100.00%
Propane		
Isobutane	0.00%	100.00%
n-Butane	0.00%	100.00%
n-Pentane	1.30%	98.70%

## STREAM REPORTS:

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# WET GAS STREAM

-----

Temperature: 93.00 deg. F Pressure: 959.70 psia Flow Rate: 5.01e+005 scfh

Component	Conc.	Loading	Po
		(lb/hr)	
Carbon Dioxide Nitrogen Methane	1.05e-001 6.50e+000 8.96e-002 9.29e+001 4.13e-001	3.77e+003 3.31e+001 1.97e+004	
Isobutane n-Butane	1.59e-002 4.10e-003 7.59e-003 8.99e-004	3.14e+000 5.82e+000	
Total Components	100.00	2.37e+004	
DRY GAS STREAM			
Temperature: 93.00 deg. F Pressure: 959.70 psia Flow Rate: 5.00e+005 scfh			
Component	Conc. (vol%)	Loading (lb/hr)	
Carbon Dioxide Nitrogen Methane	5.07e-003 6.49e+000 8.97e-002 9.30e+001 4.14e-001	3.76e+003 3.31e+001 1.97e+004	
Isobutane n-Butane	1.59e-002 4.10e-003 7.59e-003 8.98e-004	3.14e+000 5.81e+000	
Total Components	100.00	2.36e+004	
LEAN GLYCOL STREAM			
Temperature: 93.00 deg. F Flow Rate: 2.50e+000 gpm			
Component		Loading (lb/hr)	
Water Carbon Dioxide Nitrogen	9.85e+001 1.50e+000	1.39e+003 2.11e+001 1.10e-009 7.82e-013	
Propane Isobutane n-Butane n-Pentane	3.72e-009 2.89e-011 1.00e-011 2.02e-011 7.75e-007	4.06e-010 1.41e-010 2.85e-010 1.09e-005	
Total Components			
RICH GLYCOL AND PUMP GAS STREAM			

Temperature: 93.00 deg. F Pressure: 959.70 psia

Flow Rate: 2.67e+000 gpm

NOTE: Stream has more than one phase.

Component	Conc. (wt%)	Loading (lb/hr)
Water Carbon Dioxide Nitrogen	9.33e+001 3.03e+000 1.16e+000 4.18e-003 2.45e+000	4.50e+001 1.72e+001 6.21e-002
Propane Isobutane n-Butane	2.56e-002 1.69e-003 6.64e-004 1.42e-003 2.41e-004	2.51e-002 9.86e-003 2.10e-002
Total Components	100.00	1.49e+003

#### FLASH TANK OFF GAS STREAM

-----

Temperature: 84.40 deg. F Pressure: 63.50 psia Flow Rate: 9.91e+002 scfh

Component	Conc. (vol%)	Loading (lb/hr)
Water	6.41e-002	3.01e-002
Carbon Dioxide	1.32e+001	1.52e+001
Nitrogen	8.42e-002	6.16e-002
Methane	8.61e+001	3.61e+001
Ethane	4.68e-001	3.68e-001
Dwanana	2 020 002	2 220 002
<b>-</b>	2.02e-002	
	5.73e-003	
n-Butane	1.17e-002	1.77e-002
n-Pentane	1.46e-003	2.75e-003
Total Components	100.00	5.18e+001

# FLASH TANK GLYCOL STREAM

-----

Temperature: 84.40 deg. F Flow Rate: 2.55e+000 gpm

Component	Conc. (wt%)	Loading (lb/hr)
Water Carbon Dioxide Nitrogen	9.67e+001 3.14e+000 1.39e-001 3.23e-005 1.96e-002	4.50e+001 2.00e+000 4.62e-004
Propane Isobutane n-Butane	8.31e-004 1.28e-004 8.13e-005 2.29e-004 5.85e-005	1.83e-003 1.17e-003 3.28e-003
Total Components	100.00	1.43e+003

## FLASH GAS EMISSIONS

Control Method: Recycle/recompression

Control Efficiency: 100.00

Note: Flash Gas Emissions are zero with the Recycle/recompression control option.

## REGENERATOR OVERHEADS STREAM

\_\_\_\_\_

Temperature: 212.00 deg. F Pressure: 14.70 psia Flow Rate: 5.27e+002 scfh

Component	Conc. (vol%)	Loading (lb/hr)
Carbon Dioxide Nitrogen Methane	9.54e+001 3.27e+000 1.19e-003 1.26e+000 2.86e-002	2.00e+000 4.62e-004 2.81e-001
Isobutane n-Butane	2.99e-003 1.44e-003 4.07e-003 8.27e-004	1.17e-003 3.28e-003
Total Components	100.00	2.61e+001

# **Dehydrator Reboiler Exhaust Emissions Calculations**

Unit Number: 9b. 10b

Description: Dehydrator Reboiler (12 mmscfd)

Note: The data on this worksheet applies to each individual emissions unit identified above.

#### **Fuel Consumption**

1.087 MMBtu/hrCapacityscf/hr x Btu/scf / 1,000,0001,208 scf/hrHourly fuel consumptionMfg. data (Enertek)

8,760 hr/yrAnnual operating timeHarvest9,524 MMBtu/yrAnnual fuel consumptionMMBtu/hr x hr/yr10.58 MMscf/yrAnnual fuel consumptionscf/hr x hr/yr / 1,000,000900 Btu/scfField gas heating valueNominal heat content

## Steady-State Emission Rates

Pollutants	Emission Factors,	Uncontrolled E	mission Rates,
	lb/day	pph	tpy
NOX	1.03	4.29E-02	1.88E-01
CO	0.78	3.25E-02	1.42E-01
VOC	0.12	4.79E-03	2.10E-02
SO2	0.02	8.33E-04	3.65E-03

NOX emission factor taken from August 1994 Enertek Letter

CO, TOC and SO2 emission factors taken from July 1998 InFab Letter

50% of TOC emissions are assumed to be VOC emissions, consistent with AP-42, Table 1.4-2

Uncontrolled Emission Rates (pph) = lb/day / 24 hr/day

Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr / 2,000 lb/ton

Pollutants	Emission Factors, lb/MMscf	Uncontrolled E	Emission Rates,
PM	7.60	9.18E-03	4.02E-02
PM10	7.60	9.18E-03	4.02E-02
PM2 5	7.60	9 18F-03	4 02F-02

Emission factors taken from AP-42, Table 1.4-2

Uncontrolled Emission Rates (pph) = lb/MMscf x (scf/hr / 1,000,000)

Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr / 2,000 lb/ton

#### **Exhaust Parameters**

600 °F	Exhaust temperature	Mfg. data (Enertek & InFab)
199.6 cfm	Stack flowrate	fps x ft^2 x 60 sec/min
0.83 ft	Stack diameter	Mfg. data (InFab)
0.55 ft^2	Stack exit area	3.1416 x ((ft / 2) ^2)
6.1 fps	Stack velocity	Mfg. data (Enertek & InFab)
10.0 ft	Stack height	Mfg. data (InFab)

# GRI-HAPCalc ® 3.01 External Combustion Devices Report

Facility ID: 32-7 CDP Notes:

Operation Type: COMPRESSOR STATION

Facility Name: 32-7 CDP User Name: Cirrus

Units of Measure: U.S. STANDARD

Note: Emissions less than 5.00E-09 tons (or tonnes) per year are considered insignificant and are treated as zero.

These emissions are indicated on the report with a "0".

Emissions between 5.00E-09 and 5.00E-05 tons (or tonnes) per year are represented on the report with "0.0000".

# **External Combustion Devices**

Unit Name: 12MM\_RBLR

Hours of Operation: 8,760 Yearly
Heat Input: \*\*\*\*\*\*\*\* MMBtu/hr

Fuel Type: NATURAL GAS

Device Type: BOILER

Emission Factor Set: EPA > FIELD > LITERATURE

Additional EF Set: -NONE-

# **Calculated Emissions** (ton/yr)

Chemical Name	Emissions	Emission Factor	<b>Emission Factor Set</b>
HAPs_			
3-Methylcholanthrene	0.0000	0.0000000018 lb/MMBtu	EPA
7,12-Dimethylbenz(a)anthracene	0.0000	0.000000157 lb/MMBtu	EPA
Formaldehyde	0.0003	0.0000735294 lb/MMBtu	EPA
Methanol	0.0020	0.0004333330 lb/MMBtu	GRI Field
Acetaldehyde	0.0014	0.0002909000 lb/MMBtu	GRI Field
1,3-Butadiene	0.0000	0.0000001830 lb/MMBtu	GRI Field
Benzene	0.0000	0.0000020588 lb/MMBtu	EPA
Toluene	0.0000	0.0000033333 lb/MMBtu	EPA
Ethylbenzene	0.0000	0.0000000720 lb/MMBtu	GRI Field
Xylenes(m,p,o)	0.0000	0.0000010610 lb/MMBtu	GRI Field
2,2,4-Trimethylpentane	0.0002	0.0000323000 lb/MMBtu	GRI Field
n-Hexane	0.0083	0.0017647059 lb/MMBtu	EPA
Phenol	0.0000	0.0000000950 lb/MMBtu	GRI Field
Naphthalene	0.0000	0.0000005980 lb/MMBtu	EPA
2-Methylnaphthalene	0.0000	0.0000000235 lb/MMBtu	EPA
Acenaphthylene	0.0000	0.000000018 lb/MMBtu	EPA
Biphenyl	0.0000	0.0000011500 lb/MMBtu	GRI Field
Acenaphthene	0.0000	0.000000018 lb/MMBtu	EPA
Fluorene	0.0000	0.0000000027 lb/MMBtu	EPA
Anthracene	0.0000	0.0000000024 lb/MMBtu	EPA
Phenanthrene	0.0000	0.0000000167 lb/MMBtu	EPA
Fluoranthene	0.0000	0.0000000029 lb/MMBtu	EPA
Pyrene	0.0000	0.0000000049 lb/MMBtu	EPA
Benz(a)anthracene	0.0000	0.0000000018 lb/MMBtu	EPA
Chrysene	0.0000	0.000000018 lb/MMBtu	EPA

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Benzo(a)pyrene	0.0000	0.0000000012 lb/MMBtu	EPA
Benzo(b)fluoranthene	0.0000	0.0000000018 lb/MMBtu	EPA
Benzo(k)fluoranthene	0.0000	0.0000000018 lb/MMBtu	EPA
Benzo(g,h,i)perylene	0.0000	0.0000000012 lb/MMBtu	EPA
Indeno(1,2,3-c,d)pyrene	0.0000	0.0000000018 lb/MMBtu	EPA
Dibenz(a,h)anthracene	0.0000	0.0000000012 lb/MMBtu	EPA
Lead	0.0000	0.0000004902 lb/MMBtu	EPA
Total	0.0122		
Criteria Pollutants			
VOC	0.0255	0.0053921569 lb/MMBtu	EPA
PM	0.0352	0.0074509804 lb/MMBtu	EPA
PM, Condensible	0.0264	0.0055882353 lb/MMBtu	EPA
PM, Filterable	0.0088	0.0018627451 lb/MMBtu	EPA
CO	0.3896	0.0823529410 lb/MMBtu	EPA
NMHC	0.0403	0.0085294118 lb/MMBtu	EPA
NOx	0.4638	0.0980392157 lb/MMBtu	EPA
SO2	0.0028	0.0005880000 lb/MMBtu	EPA
Other Pollutants			
Dichlorobenzene	0.0000	0.0000011765 lb/MMBtu	EPA
Methane	0.0107	0.0022549020 lb/MMBtu	EPA
Acetylene	0.0252	0.0053314000 lb/MMBtu	GRI Field
Ethylene	0.0025	0.0005264000 lb/MMBtu	GRI Field
Ethane	0.0144	0.0030392157 lb/MMBtu	EPA
Propylene	0.0044	0.0009333330 lb/MMBtu	GRI Field
Propane	0.0074	0.0015686275 lb/MMBtu	EPA
Butane	0.0097	0.0020588235 lb/MMBtu	EPA
Cyclopentane	0.0002	0.0000405000 lb/MMBtu	GRI Field
Pentane	0.0121	0.0025490196 lb/MMBtu	EPA
n-Pentane	0.0095	0.0020000000 lb/MMBtu	GRI Field
Cyclohexane	0.0002	0.0000451000 lb/MMBtu	GRI Field
Methylcyclohexane	0.0008	0.0001691000 lb/MMBtu	GRI Field
n-Octane	0.0002	0.0000506000 lb/MMBtu	GRI Field
n-Nonane	0.0000	0.0000050000 lb/MMBtu	GRI Field

556.5176

117.6470588235 lb/MMBtu

EPA

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CO2

Case Name: 32-7 EU 11a, 12a, 24a, & 25a PTE (gas 2018-06-19)

File Name: C:\Users\user\Documents\Cirrus\Permit applications\New Mexico\Harvest Four Corners (formerly WFC)\0 032-7\TITLE V\2019-09 Sept Title V mod-incorp. NSR\Analyses &

bkgrnd info\GLYCalc\32-7 20 mm dehys PTE (gas 2018-06-19).ddf

Date: September 19, 2019

#### DESCRIPTION:

Description: 32-7 EU 11a, 12a, 24a, & 25a 20 mmcfd

PTE analysis for the 2019-Oct Title V

Modification Appl

6/19/2018 GAS ext. analysis & parameters

inc.flash tank temp & pressure

Annual Hours of Operation: 8760.0 hours/yr

WET GAS:

\_\_\_\_\_\_

Temperature: 93.00 deg. Pressure: 945.00 psig 93.00 deg. F

Wet Gas Water Content: Saturated

Component	Conc. (vol %)
Carbon Dioxide	6.5048
Nitrogen	0.0897
Methane	92.9634
Ethane	0.4137
Propane	0.0159
Isobutane	0.0041
n-Butane	0.0076
n-Pentane	0.0009

DRY GAS:

Flow Rate: 20.0 MMSCF/day Water Content: 7.0 lbs. H2O/MMSCF

LEAN GLYCOL:

Glycol Type: TEG

Water Content: 1.5 wt% H20 Flow Rate: 2.5 gpm

PUMP:

\_\_\_\_\_\_

Glycol Pump Type: Gas Injection

Gas Injection Pump Volume Ratio: 0.080 acfm gas/gpm glycol

FLASH TANK:

Flash Control: Recycle/recompression
Temperature: 84.4 deg. F
Pressure: 48.8 psig

# GRI-GLYCalc VERSION 4.0 - AGGREGATE CALCULATIONS REPORT

Case Name: 32-7 EU 11a, 12a, 24a, & 25a PTE (gas 2018-06-19)

File Name: C:\Users\user\Documents\Cirrus\Permit applications\New Mexico\Harvest Four Corners (formerly WFC)\0 032-7\TITLE V\2019-09 Sept Title V mod-incorp. NSR\Analyses &

bkgrnd info\GLYCalc\32-7 20 mm dehys PTE (gas 2018-06-19).ddf

Date: September 19, 2019

#### DESCRIPTION:

Description: 32-7 EU 11a, 12a, 24a, & 25a 20 mmcfd

dehys

PTE analysis for the 2019-Oct Title V

Modification Appl

6/19/2018 GAS ext. analysis & parameters

inc.flash tank temp & pressure

Annual Hours of Operation: 8760.0 hours/yr

#### EMISSIONS REPORTS:

\_\_\_\_\_\_

#### UNCONTROLLED REGENERATOR EMISSIONS

Comp	onent	lbs/hr	lbs/day	tons/yr
	Methane Ethane Propane Isobutane n-Butane	0.2759 0.0113 0.0018 0.0011 0.0032	6.621 0.272 0.043 0.027 0.077	1.2083 0.0496 0.0079 0.0050 0.0141
	n-Pentane	0.0008	0.019	0.0035
	Total Emissions	0.2941	7.059	1.2884
_	carbon Emissions al VOC Emissions	0.2941 0.0070	7.059 0.167	1.2884 0.0305

Post script:

For compliance demonstration purposes.

(Not a requested emission limit.)

FLASH GAS EMISSIONS (Not a

Note: Flash Gas Emissions are zero with the Recycle/recompression control option.

# FLASH TANK OFF GAS

Component	lbs/hr	lbs/day	tons/yr
Methane Ethane Propane Isobutane n-Butane	36.3643 0.3686 0.0234 0.0087 0.0178	872.743 8.846 0.562 0.209 0.427	159.2756 1.6144 0.1026 0.0382 0.0779
n-Pentane	0.0028	0.066	0.0121
Total Emissions	36.7856	882.854	161.1208
Total Hydrocarbon Emissions Total VOC Emissions	36.7856 0.0527	882.854 1.265	161.1208 0.2308

#### COMBINED REGENERATOR VENT/FLASH GAS EMISSIONS

Comp	onent	lbs/hr	lbs/day	tons/yr
	Methane Ethane Propane Isobutane n-Butane	0.2759 0.0113 0.0018 0.0011 0.0032	6.621 0.272 0.043 0.027 0.077	1.2083 0.0496 0.0079 0.0050 0.0141
	n-Pentane	0.0008	0.019	0.0035
	Total Emissions	0.2941	7.059	1.2884
	carbon Emissions al VOC Emissions	0.2941 0.0070	7.059 0.167	1.2884 0.0305

#### COMBINED REGENERATOR VENT/FLASH GAS EMISSION CONTROL REPORT:

Component	Uncontrolled tons/yr	Controlled tons/yr	% Reduction
Methane Ethane Propane Isobutane n-Butane	160.4838 1.6640 0.1105 0.0432 0.0920	1.2083 0.0496 0.0079 0.0050 0.0141	99.25 97.02 92.83 88.45 84.72
n-Pentane	0.0156	0.0035	77.44
Total Emissions	162.4091	1.2884	99.21
Total Hydrocarbon Emissions Total VOC Emissions	162.4091 0.2613	1.2884 0.0305	99.21 88.33

#### **EOUIPMENT REPORTS:**

#### ABSORBER

NOTE: Because the Calculated Absorber Stages was below the minimum allowed, GRI-GLYCalc has set the number of Absorber Stages to 1.25 and has calculated a revised Dry Gas Dew Point.

Calculated Absorber Stages: 1.25
Calculated Dry Gas Dew Point: 3.09 lbs. H2O/MMSCF

Temperature: 93.0 deg. 945.0 psig 93.0 deg. F

Dry Gas Flow Rate: 20.0000 MMSCF/day Glycol Losses with Dry Gas: 0.1876 lb/hr

Wet Gas Water Content: Saturated

Calculated Wet Gas Water Content: 50.01 lbs. H2O/MMSCF Calculated Lean Glycol Recirc. Ratio: 3.84 gal/lb H2O

Component	in Dry Gas	in Glycol
Water	6.17%	93.83%
Carbon Dioxide	99.83%	0.17%
Nitrogen	99.99%	0.01%
Methane	99.99%	0.01%
Ethane	99.96%	0.04%
Propane	99.94%	0.06%
Isobutane	99.91%	0.09%
n-Butane	99.88%	0.12%
n-Pentane	99.85%	0.15%

## FLASH TANK

\_\_\_\_\_

Flash Control: Recycle/recompression

Flash Temperature: 84.4 deg. F Flash Pressure: 48.8 psig

Component	Left in Glycol	Removed in Flash Gas
Water	99.93%	0.07%
Carbon Dioxide	11.40%	88.60%
Nitrogen	0.71%	99.29%
Methane	0.75%	99.25%
Ethane	2.98%	97.02%
Propane	7.17%	92.83%
Isobutane	11.55%	88.45%
n-Butane	15.28%	84.72%
n-Pentane	22.80%	77.20%

# REGENERATOR

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No Stripping Gas used in regenerator.

Component	Remaining in Glycol	Distilled Overhead
Water	35.03%	64.97%
Carbon Dioxide	0.00%	100.00%
Nitrogen	0.00%	100.00%
Methane	0.00%	100.00%
Ethane	0.00%	100.00%
Propane	0.00%	100.00%
Isobutane	0.00%	100.00%
n-Butane	0.00%	100.00%
n-Pentane	1.32%	98.68%

## STREAM REPORTS:

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## WET GAS STREAM

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Temperature: 93.00 deg. F Pressure: 959.70 psia Flow Rate: 8.34e+005 scfh

Component	Conc. (vol%)	Loading (lb/hr)
Carbon Dioxide Nitrogen Methane	1.05e-001 6.50e+000 8.96e-002 9.29e+001 4.13e-001	6.29e+003 5.52e+001 3.28e+004
Isobutane n-Butane	1.59e-002 4.10e-003 7.59e-003 8.99e-004	5.23e+000 9.70e+000
Total Components	100.00	3.94e+004
DRY GAS STREAM		
Temperature: 93.00 deg. F Pressure: 959.70 psia Flow Rate: 8.33e+005 scfh		
Component	Conc. (vol%)	Loading (lb/hr)
Carbon Dioxide Nitrogen Methane	6.51e-003 6.49e+000 8.97e-002 9.30e+001 4.14e-001	6.28e+003 5.52e+001 3.28e+004
Isobutane n-Butane	1.59e-002 4.10e-003 7.59e-003 8.99e-004	5.23e+000 9.69e+000
Total Components	100.00	3.94e+004
LEAN GLYCOL STREAM		
Temperature: 93.00 deg. F Flow Rate: 2.50e+000 gpm		
Component	Conc. (wt%)	Loading (lb/hr)
Water Carbon Dioxide Nitrogen	9.85e+001 1.50e+000 7.78e-011 5.41e-014 9.66e-018	2.11e+001 1.10e-009 7.61e-013
Propane Isobutane n-Butane	3.62e-009 2.86e-011 9.93e-012 2.00e-011 7.64e-007	4.03e-010 1.40e-010 2.81e-010
Total Components	100.00	1.41e+003

RICH GLYCOL AND PUMP GAS STREAM

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Temperature: 93.00 deg. F

Pressure: 959.70 psia Flow Rate: 2.70e+000 gpm

NOTE: Stream has more than one phase.

Component	Conc. (wt%)	Loading (lb/hr)
Water Carbon Dioxide Nitrogen	9.24e+001 4.02e+000 1.15e+000 4.17e-003 2.44e+000	6.03e+001 1.72e+001 6.25e-002
Propane Isobutane n-Butane	2.53e-002 1.68e-003 6.57e-004 1.40e-003 2.38e-004	2.52e-002 9.87e-003 2.10e-002
Total Components	100.00	1.50e+003

#### FLASH TANK OFF GAS STREAM

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Temperature: 84.40 deg. F Pressure: 63.50 psia Flow Rate: 9.98e+002 scfh

Component Conc. Loading (vol%) (lb/hr)

Water 8.66e-002 4.10e-002
Carbon Dioxide 1.32e+001 1.52e+001
Nitrogen 8.42e-002 6.21e-002
Methane 8.62e+001 3.64e+001
Ethane 4.66e-001 3.69e-001

Propane 2.02e-002 2.34e-002
Isobutane 5.71e-003 8.73e-003
n-Butane 1.16e-002 1.78e-002
n-Pentane 1.45e-003 2.76e-003

Total Components 100.00 5.21e+001

# FLASH TANK GLYCOL STREAM

\_\_\_\_\_\_

Temperature: 84.40 deg. F Flow Rate: 2.58e+000 gpm

Component	Conc. (wt%)	Loading (lb/hr)
Water Carbon Dioxide Nitrogen	9.57e+001 4.16e+000 1.35e-001 3.08e-005 1.90e-002	6.03e+001 1.96e+000 4.47e-004
Propane Isobutane n-Butane	7.82e-004 1.25e-004 7.86e-005 2.21e-004 5.62e-005	1.81e-003 1.14e-003 3.21e-003
Total Components	100.00	1.45e+003

## FLASH GAS EMISSIONS

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Control Method: Recycle/recompression

Control Efficiency: 100.00

Note: Flash Gas Emissions are zero with the Recycle/recompression control option.

#### REGENERATOR OVERHEADS STREAM

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Temperature: 212.00 deg. F Pressure: 14.70 psia Flow Rate: 8.49e+002 scfh

Component	Conc. (vol%)	Loading (lb/hr)
Carbon Dioxide Nitrogen Methane	9.72e+001 1.99e+000 7.13e-004 7.69e-001 1.68e-002	1.96e+000 4.47e-004 2.76e-001
Isobutane n-Butane	1.83e-003 8.76e-004 2.47e-003 4.98e-004	1.14e-003 3.21e-003
Total Components	100.00	4.14e+001

# **Dehydrator Reboiler Exhaust Emissions Calculations**

Unit Number: 11b, 12b, 24b, 25b

Description: Dehydrator Reboiler (20 mmscfd)

Note: The data on this worksheet applies to each individual emissions unit identified above.

#### **Fuel Consumption**

1.483 MMBtu/hrCapacityscf/hr x Btu/scf / 1,000,0001,648 scf/hrHourly fuel consumptionMfg. data (Enertek)8,760 hr/yrAnnual operating timeHarvest

 12,993 MMBtu/yr
 Annual fuel consumption
 MMBtu/hr x hr/yr

 14.44 MMscf/yr
 Annual fuel consumption
 scf/hr x hr/yr / 1,000,000

 900 Btu/scf
 Field gas heating value
 Nominal heat content

## Steady-State Emission Rates

Pollutants	Emission Factors,	Uncontrolled E	mission Rates,
	lb/day	pph	tpy
NOX	1.03	4.29E-02	1.88E-01
CO	1.07	4.46E-02	1.95E-01
VOC	0.16	6.46E-03	2.83E-02
SO2	0.02	8 33F-04	3 65F-03

NOX emission factor taken from August 1994 Enertek Letter

CO, TOC and SO2 emission factors taken from July 1998 InFab Letter

50% of TOC emissions are assumed to be VOC emissions, consistent with AP-42, Table 1.4-2

Uncontrolled Emission Rates (pph) = lb/day / 24 hr/day

Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr / 2,000 lb/ton

Pollutants	Emission Factors,	Uncontrolled F	mission Rates,
1 Gildtarito	lb/MMscf	pph	tpy
PM	7.60	1.25E-02	5.49E-02
PM10	7.60	1.25E-02	5.49E-02
PM2.5	7.60	1.25E-02	5.49E-02

Emission factors taken from AP-42, Table 1.4-2

Uncontrolled Emission Rates (pph) = lb/MMscf x (scf/hr / 1,000,000)

Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr / 2,000 lb/ton

#### **Exhaust Parameters**

Mfg. data (Enertek & InFab) Exhaust temperature 600 °F 287.46 cfm Stack flowrate fps x ft^2 x 60 sec/min Mfg. data (InFab) 1.00 ft Stack diameter 0.79 ft^2 Stack exit area 3.1416 x ((ft / 2) ^2) 6.1 fps Stack velocity Mfg. data (Enertek & InFab) 10.0 ft Stack height Mfg. data (InFab)

# GRI-HAPCalc ® 3.01 External Combustion Devices Report

Facility ID: 32-7 CDP Notes:

Operation Type: COMPRESSOR STATION

Facility Name: 32-7 CDP User Name: Cirrus

Units of Measure: U.S. STANDARD

Note: Emissions less than 5.00E-09 tons (or tonnes) per year are considered insignificant and are treated as zero.

These emissions are indicated on the report with a "0".

Emissions between 5.00E-09 and 5.00E-05 tons (or tonnes) per year are represented on the report with "0.0000".

# External Combustion Devices

Unit Name: 20MM\_RBLR

Hours of Operation: 8,760 Yearly
Heat Input: \*\*\*\*\*\*\*\* MMBtu/hr

Fuel Type: NATURAL GAS

Device Type: BOILER

Emission Factor Set: EPA > FIELD > LITERATURE

Additional EF Set: -NONE-

# **Calculated Emissions** (ton/yr)

Chemical Name	Emissions	Emission Factor	<b>Emission Factor Set</b>
<u>HAPs</u>			
3-Methylcholanthrene	0.0000	0.0000000018 lb/MMBtu	EPA
7,12-Dimethylbenz(a)anthracene	0.0000	0.0000000157 lb/MMBtu	EPA
Formaldehyde	0.0005	0.0000735294 lb/MMBtu	EPA
Methanol	0.0028	0.0004333330 lb/MMBtu	GRI Field
Acetaldehyde	0.0019	0.0002909000 lb/MMBtu	GRI Field
1,3-Butadiene	0.0000	0.0000001830 lb/MMBtu	GRI Field
Benzene	0.0000	0.0000020588 lb/MMBtu	EPA
Toluene	0.0000	0.0000033333 lb/MMBtu	EPA
Ethylbenzene	0.0000	0.0000000720 lb/MMBtu	GRI Field
Xylenes(m,p,o)	0.0000	0.0000010610 lb/MMBtu	GRI Field
2,2,4-Trimethylpentane	0.0002	0.0000323000 lb/MMBtu	GRI Field
n-Hexane	0.0114	0.0017647059 lb/MMBtu	EPA
Phenol	0.0000	0.000000950 lb/MMBtu	GRI Field
Naphthalene	0.0000	0.0000005980 lb/MMBtu	EPA
2-Methylnaphthalene	0.0000	0.0000000235 lb/MMBtu	EPA
Acenaphthylene	0.0000	0.000000018 lb/MMBtu	EPA
Biphenyl	0.0000	0.0000011500 lb/MMBtu	GRI Field
Acenaphthene	0.0000	0.000000018 lb/MMBtu	EPA
Fluorene	0.0000	0.0000000027 lb/MMBtu	EPA
Anthracene	0.0000	0.0000000024 lb/MMBtu	EPA
Phenanthrene	0.0000	0.000000167 lb/MMBtu	EPA
Fluoranthene	0.0000	0.0000000029 lb/MMBtu	EPA
Pyrene	0.0000	0.0000000049 lb/MMBtu	EPA
Benz(a)anthracene	0.0000	0.000000018 lb/MMBtu	EPA
Chrysene	0.0000	0.000000018 lb/MMBtu	EPA

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Benzo(a)pyrene	0.0000	0.0000000012 lb/MMBtu	EPA
Benzo(b)fluoranthene	0.0000	0.000000018 lb/MMBtu	EPA
Benzo(k)fluoranthene	0.0000	0.000000018 lb/MMBtu	EPA
Benzo(g,h,i)perylene	0.0000	0.0000000012 lb/MMBtu	EPA
Indeno(1,2,3-c,d)pyrene	0.0000	0.0000000018 lb/MMBtu	EPA
Dibenz(a,h)anthracene	0.0000	0.0000000012 lb/MMBtu	EPA
Lead	0.0000	0.0000004902 lb/MMBtu	EPA
Total	0.0168		
Criteria Pollutants			
VOC	0.0350	0.0053921569 lb/MMBtu	EPA
PM	0.0483	0.0074509804 lb/MMBtu	EPA
PM, Condensible	0.0362	0.0055882353 lb/MMBtu	EPA
PM, Filterable	0.0121	0.0018627451 lb/MMBtu	EPA
CO	0.5338	0.0823529410 lb/MMBtu	EPA
NMHC	0.0553	0.0085294118 lb/MMBtu	EPA
NOx	0.6355	0.0980392157 lb/MMBtu	EPA
SO2	0.0038	0.0005880000 lb/MMBtu	EPA
302	0.0036	0.000000000 lb/lvllvld	
302	0.0000	0.000000000 IB/WWDta	
Other Pollutants	0.0000	G.GGGGGGGG IBINIMBIG	
	0.0000	0.0000011765 lb/MMBtu	EPA
Other Pollutants			
Other Pollutants Dichlorobenzene	0.0000	0.0000011765 lb/MMBtu	EPA
Other Pollutants Dichlorobenzene Methane	0.0000 0.0146	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu	EPA EPA
Other Pollutants  Dichlorobenzene  Methane  Acetylene	0.0000 0.0146 0.0346	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu	EPA EPA GRI Field
Other Pollutants  Dichlorobenzene  Methane  Acetylene Ethylene	0.0000 0.0146 0.0346 0.0034	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu	EPA EPA GRI Field GRI Field
Other Pollutants  Dichlorobenzene  Methane  Acetylene  Ethylene  Ethane	0.0000 0.0146 0.0346 0.0034 0.0197	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu 0.0030392157 lb/MMBtu	EPA EPA GRI Field GRI Field EPA
Other Pollutants  Dichlorobenzene  Methane  Acetylene  Ethylene  Ethane  Propylene	0.0000 0.0146 0.0346 0.0034 0.0197 0.0061	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu 0.0030392157 lb/MMBtu 0.0009333330 lb/MMBtu	EPA EPA GRI Field GRI Field EPA GRI Field
Other Pollutants  Dichlorobenzene  Methane  Acetylene Ethylene Ethane Propylene Propane	0.0000 0.0146 0.0346 0.0034 0.0197 0.0061 0.0102	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu 0.0030392157 lb/MMBtu 0.0009333330 lb/MMBtu 0.0015686275 lb/MMBtu	EPA EPA GRI Field GRI Field EPA GRI Field EPA
Other Pollutants  Dichlorobenzene  Methane  Acetylene  Ethylene  Ethane  Propylene  Propane  Butane	0.0000 0.0146 0.0346 0.0034 0.0197 0.0061 0.0102 0.0133	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu 0.0030392157 lb/MMBtu 0.0009333330 lb/MMBtu 0.0015686275 lb/MMBtu 0.0020588235 lb/MMBtu	EPA EPA GRI Field GRI Field EPA GRI Field EPA EPA
Other Pollutants  Dichlorobenzene  Methane  Acetylene Ethylene Ethane Propylene Propane Butane Cyclopentane	0.0000 0.0146 0.0346 0.0034 0.0197 0.0061 0.0102 0.0133 0.0003	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu 0.0030392157 lb/MMBtu 0.0009333330 lb/MMBtu 0.0015686275 lb/MMBtu 0.0020588235 lb/MMBtu 0.0000405000 lb/MMBtu	EPA EPA GRI Field GRI Field EPA GRI Field EPA EPA GRI Field
Other Pollutants  Dichlorobenzene  Methane  Acetylene Ethylene Ethane Propylene Propane Butane Cyclopentane Pentane	0.0000 0.0146 0.0346 0.0034 0.0197 0.0061 0.0102 0.0133 0.0003	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu 0.0030392157 lb/MMBtu 0.0009333330 lb/MMBtu 0.0015686275 lb/MMBtu 0.0020588235 lb/MMBtu 0.0000405000 lb/MMBtu 0.00025490196 lb/MMBtu	EPA EPA GRI Field GRI Field EPA GRI Field EPA EPA GRI Field
Other Pollutants  Dichlorobenzene  Methane  Acetylene Ethylene Ethane Propylene Propane Butane Cyclopentane Pentane n-Pentane	0.0000 0.0146 0.0346 0.0034 0.0197 0.0061 0.0102 0.0133 0.0003 0.0165 0.0130	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu 0.0030392157 lb/MMBtu 0.0009333330 lb/MMBtu 0.0015686275 lb/MMBtu 0.0020588235 lb/MMBtu 0.0000405000 lb/MMBtu 0.0025490196 lb/MMBtu 0.00200000000 lb/MMBtu	EPA EPA GRI Field EPA GRI Field EPA EPA GRI Field EPA GRI Field EPA GRI Field
Other Pollutants  Dichlorobenzene  Methane  Acetylene Ethylene Ethane Propylene Propane Butane Cyclopentane Pentane n-Pentane Cyclohexane	0.0000 0.0146 0.0346 0.0034 0.0197 0.0061 0.0102 0.0133 0.0003 0.0165 0.0130 0.0003	0.0000011765 lb/MMBtu 0.0022549020 lb/MMBtu 0.0053314000 lb/MMBtu 0.0005264000 lb/MMBtu 0.0030392157 lb/MMBtu 0.0009333330 lb/MMBtu 0.0015686275 lb/MMBtu 0.0020588235 lb/MMBtu 0.0000405000 lb/MMBtu 0.0025490196 lb/MMBtu 0.0020000000 lb/MMBtu 0.00200000000 lb/MMBtu	EPA EPA GRI Field EPA GRI Field EPA EPA GRI Field EPA GRI Field EPA GRI Field

762.6353

117.6470588235 lb/MMBtu

EPA

CO2

# **Storage Tank Emissions Calculations**

Unit Number: T-38, T-39 & T-40

Description: Produced Water Storage Tanks (in aggregate)

Note: The data on this worksheet applies to each individual emissions unit identified above.

## Throughput

1,302,000gallons per year (gpy)Annual liquid throughputHarvest31,000barrels (bbl) per yearAnnual liquid throughputgpy / 42 bbl/gal

#### **Emission Rates**

		Uncontrolled
	Emission	Emission
Pollutant	Factor,	Rate,
	lb/bbl	tpy
VOC	0.262	4.06
Benzene	0.007	1.09E-01
Ethylbenzene	0.0007	1.09E-02
n-Hexane	0.022	3.41E-01
Toluene	0.009	1.40E-01
Xylene	0.006	9.30E-02

VOC, Benzene, and n-Hexane emission factors are from the CDPHE PS Memo 09-02
(Oil & Gas Produced Water Tank Batteries - Regulatory Definitions & Permitting Guidance)
Ethylbenzene, toluene, and xylene emissions factors (Non-Texas) are from the TCEQ
Project 2010-29 (Emission Factor Determination for Produced Water Storage Tanks) report
Emission Rate (tpy) = Ib/bbl x bbl/yr / 2,000 lb/ton

# **Equipment Leaks Emissions Calculations**

Unit Number: F-1 (Insignificant source demonstration)

Description: Valves, Connectors, Seals & Open-Ended Lines

#### **Steady-State Emission Rates**

	Number of	Emission	Emission	Uncontro	lled TOC
Equipment	Components,	Factors,	Factors,	Emission	n Rates,
	# of sources	kg/hr/source	lb/hr/source	pph	tpy
Valves	1368	0.0045	0.0099	13.54	59.32
Connectors	1523	0.0002	0.0004	0.67	2.94
Pump Seals	12	0.0024	0.0053	0.06	0.28
Compressor Seals	92	0.0088	0.0194	1.78	7.80
Pressure Relief Valves	127	0.0088	0.0194	2.46	10.77
Open-Ended Lines	367	0.0020	0.0044	1.61	7.07
Total				20.13	88.18

Number of components based on the numbers of compressors and dehydrators at the station (see next page)

Emission factors taken from the EPA "1995 Protocol for Equipment Leak Emission Estimates"

Emission factors (lb/hr/source) = Emission factors (kg/hr/source) x 2.2 lb/kg

Uncontrolled TOC Emission Rates (pph) = lb/hr/source x # of sources

Uncontrolled TOC Emission Rates (tpy) = Uncontrolled TOC Emission Rates (pph) x 8,760 hr/yr / 2,000 lb/ton

				Weight		
	Mole	Molecular	Component	Percent		
Components	Percents,	Weights,	Weights,	of TOC,	Uncontrolled E	mission Rates,
	%	lb/lb-mole	lb/lb-mole	%	pph	tpy
Carbon dioxide	6.5048	44.010				
Hydrogen sulfide	0.0000	34.070				
Nitrogen	0.0897	28.013				
Methane	92.9634	16.043	1491.412	99.073		
Ethane	0.4137	30.070	12.440	0.826		
Propane	0.0159	44.097	0.701	0.047	9.38E-03	4.11E-02
Isobutane	0.0041	58.123	0.238	0.016	3.19E-03	1.40E-02
n-Butane	0.0022	58.123	0.128	0.008	1.71E-03	7.49E-03
Isopentane	0.0054	72.150	0.390	0.026	5.21E-03	2.28E-02
n-Pentane	0.0009	72.150	0.065	0.004	8.68E-04	3.80E-03
Cyclopentane	0.0000	70.134	0.000	0.000	0.00E+00	0.00E+00
n-Hexane	0.0000	86.177	0.000	0.000	0.00E+00	0.00E+00
Cyclohexane	0.0000	84.161	0.000	0.000	0.00E+00	0.00E+00
Other hexanes	0.0000	86.177	0.000	0.000	0.00E+00	0.00E+00
Heptanes	0.0000	100.204	0.000	0.000	0.00E+00	0.00E+00
Methylcyclohexane	0.0000	98.188	0.000	0.000	0.00E+00	0.00E+00
2,2,4-Trimethylpentane	0.0000	114.231	0.000	0.000	0.00E+00	0.00E+00
Benzene	0.0000	78.114	0.000	0.000	0.00E+00	0.00E+00
Toluene	0.0000	92.141	0.000	0.000	0.00E+00	0.00E+00
Ethylbenzene	0.0000	106.167	0.000	0.000	0.00E+00	0.00E+00
Xylenes	0.0000	106.167	0.000	0.000	0.00E+00	0.00E+00
C8+ Heavies	0.0000	114.231	0.000	0.000	0.00E+00	0.00E+00
Total	100.0001		1505.374			
Total VOC				0.101	0.020	0.089

Gas stream composition obtained from the 32-7 CDP extended gas analysis dated June 19, 2018. (The above is not a component Weights (lb/lb-mole) = (% / 100) \* Molecular Weights (lb/lb-mole) requested permit limit.)

Weight Percent of TOC (%) = 100 x Component Weights (lb/lb-mole) / Total Component Weight (lb/lb-mole)

Uncontrolled Emission Rates (pph) = Total Uncontrolled TOC Emission Rate (pph) x (% / 100)

Uncontrolled Emission Rates (tpy) = Total Uncontrolled TOC Emission Rate (tpy) x (% / 100)

# **Equipment Leaks Emissions Calculations**

Unit Number: F-1

Description: Valves, Connectors, Seals & Lines

Number of Compression Units at the Facility: 17
Number of Dehydrators at the Facility: 6

	Equipment Count					Instrument Count			
					Pressure				
Process Equipment Description			Pump	Compressor	Relief				
	Valves	Connectors	Seals	Seals	Valves	Open-end	Flow	Level	Pressure
Station inlet, meter run to pulsation dampener	17	14	0	0	1	13	3	0	3
Pulsation dampener	12	8	0	0	0	2	0	4	1
Compressor suction header	7	4	0	0	0	3	0	0	1
Suction header feed to instrument gas header	3	1	0	0	0	1	0	0	0
Compressor discharge header and bypass to station discharge	6	5	0	0	0	3	0	1	1
Compressor discharge header and suction header bypass lines	4	2	0	0	0	2	0	0	1
Fuel gas header	2	2	0	0	1	2	0	0	1
Instrument gas header	2	2	0	0	1	2	0	0	0
Station discharge header	9	5	0	0	1	6	0	0	2
Fuel gas recovery header	2	2	0	0	1	2	0	0	0
Fuel gas feed and filter loop	15	9	0	0	0	1	0	4	1
Instrument gas feed and filter loop	9	11	0	0	0	3	0	0	0
Produced water storage tank	1	0	0	0	0	1	0	1	0
ESD panel	12	0	0	0	0	0	0	0	0
Starting gas header	6	2	0	0	1	3	0	0	0
Hot gas header	2	2	0	0	0	2	0	0	0
Volume bottle lop	12	4	0	24	1	2	0	0	1
Components from Compressors	748	1003	0	68	102	187	0	68	153
Components from dehydrators	36	60	12	0	18	36	0	18	24
Total	905	1136	12	92	127	271	3	96	189
Adjusted Total	1368	1523	12	92	127	367			

The following additions are included in the Adjusted Total:

- 1 valve is added for each open end line
- 2 connectors are added for each flow meter
- 2 valves, 2 connectors and 1 open end line are added for each level gauge
- 1 connector is added for each pressure gauge

The component count is based on an evaluation of the Sim Mesa Compressor Station (two stage compression)

# **Malfunction Emissions Data and Calculations**

Unit Number: M-1

Description: Malfunctions

#### **Emission Rates**

Pollutants	Weight Percents, %	Uncontrolled Emission Rates, tpy
VOC		10.00
2,2,4-Trimethylpentane	0.000E+00	0.00E+00
Benzene	0.000E+00	0.00E+00
Ethylbenzene	0.000E+00	0.00E+00
n-Hexane	0.000E+00	0.00E+00
Toluene	0.000E+00	0.00E+00
Xylene	0.000E+00	0.00E+00

Weight percents calculated from gas composition (see table below)

Uncontrolled Emission Rates (tpy) = VOC Emission Rate (tpy) x (% / 100)

## **Gas Composition**

	Mole	Molecular	Component	Weight
Components	Percents,	Weights,	Weights,	Percent,
	%	lb/lb-mole	lb/lb-mole	%
Carbon dioxide	6.5048	44.01		
Hydrogen sulfide	0.0000	34.07		
Nitrogen	0.0897	28.01		
Methane	92.9634	16.04		
Ethane	0.4137	30.07		
Propane	0.0159	44.09	0.0070	4.607E+01
Isobutane	0.0041	58.12	0.0024	1.566E+01
n-Butane	0.0022	58.12	0.0013	8.403E+00
Isopentane	0.0054	72.15	0.0039	2.560E+01
n-Pentane	0.0009	72.15	0.0006	4.267E+00
Cyclopentane	0.0000	70.14	0.0000	0.000E+00
n-Hexane	0.0000	86.17	0.0000	0.000E+00
Cyclohexane	0.0000	84.16	0.0000	0.000E+00
Other hexanes	0.0000	86.18	0.0000	0.000E+00
Heptanes	0.0000	100.20	0.0000	0.000E+00
Methylcyclohexane	0.0000	98.19	0.0000	0.000E+00
2,2,4-Trimethylpentane	0.0000	100.21	0.0000	0.000E+00
Benzene	0.0000	78.11	0.0000	0.000E+00
Toluene	0.0000	92.14	0.0000	0.000E+00
Ethylbenzene	0.0000	106.17	0.0000	0.000E+00
Xylenes	0.0000	106.17	0.0000	0.000E+00
C8+ Heavies	0.0000	110.00	0.0000	0.000E+00
Total	100.0001			
Total VOC			0.0152	

Gas stream composition obtained from the 32-7 CDP extended gas analysis dated June 19, 2018. Component Weights (lb/lb-mole) = (% / 100) x Molecular Weights (lb/lb-mole)

Weight Percents (%) = 100 x Component Weights (lb/lb-mole) / Total VOC Weight (lb/lb-mole)

# **Miscellaneous Insignificant Storage Tanks Emissions Summary**

Unit Number: T-26 (methanol)

Description: Storage Tank Emissions - Insignificant Source Demonstration for Insignificant Activities Item #1

Source		ntrolled athing Losses (ton/yr)	Uncontrolled Flash Losses (ton/yr)	Total Uncontrolled Emissions (ton/yr)
Tank T-26 Methanol (500 gal) VOC Methanol	18.64	9.32E-03	N/A	0.00932
	18.64	9.32E-03	N/A	0.00932
STORAGE TANK EMISSION TOTALS VOC Methanol	18.64	9.32E-03	N/A	0.00932
	18.64	9.32E-03	N/A	0.00932

Working/breathing losses are calculated using TANKS 4.0.

## **TANKS 4.0.9d**

# **Emissions Report - Detail Format Tank Indentification and Physical Characteristics**

Identification

User Identification: 32-7 Methanol (500 gal)

City: Rio Arriba Co., T-32N, R-07W, Sec 34

State: NN

Company: Williams Four Corners
Type of Tank: Vertical Fixed Roof Tank

Description: 500 gal (11.9 bbl) Methanol tank 6,000 gal throughput (12 turnovers)

**Tank Dimensions** 

 Shell Height (ft):
 5.00

 Diameter (ft):
 4.50

 Liquid Height (ft):
 4.00

 Avg. Liquid Height (ft):
 2.00

 Volume (gallons):
 500.00

 Turnovers:
 12.00

 Net Throughput(gal/yr):
 6,000.00

Is Tank Heated (y/n): N

**Paint Characteristics** 

Shell Color/Shade: White/White
Shell Condition Good
Roof Color/Shade: White/White
Roof Condition: Good

**Roof Characteristics** 

Type: Cone

Height (ft) 0.00 Slope (ft/ft) (Cone Roof) 0.06

**Breather Vent Settings** 

Vacuum Settings (psig): -0.03 Pressure Settings (psig) 0.03

Meterological Data used in Emissions Calculations: Albuquerque, New Mexico (Avg Atmospheric Pressure = 12.15 psia)

# TANKS 4.0.9d Emissions Report - Detail Format Liquid Contents of Storage Tank

32-7 Methanol (500 gal) - Vertical Fixed Roof Tank Rio Arriba Co., T-32N, R-07W, Sec 34, NM

			aily Liquid S perature (d		Liquid Bulk Temp	Vapo	or Pressure	(psia)	Vapor Mol.	Liquid Mass	Vapor Mass	Mol.	Basis for Vapor Pressure
Mixture/Component	Month	Avg.	Min.	Max.	(deg F)	Avg.	Min.	Max.	Weight.	Fract.	Fract.	Weight	Calculations
Methyl alcohol	All	58.54	51.41	65.66	56.17	1.3769	1.0943	1.7198	32.0400			32.04	Option 2: A=7.897, B=1474.08, C=229.13

# TANKS 4.0.9d Emissions Report - Detail Format Detail Calculations (AP-42)

# 32-7 Methanol (500 gal) - Vertical Fixed Roof Tank Rio Arriba Co., T-32N, R-07W, Sec 34, NM

Annual Emission Calcaulations	
Standing Losses (lb):	12.3406
Vapor Space Volume (cu ft):	48.4585
Vapor Density (lb/cu ft):	0.0079
Vapor Space Expansion Factor:	0.1075
Vented Vapor Saturation Factor:	0.8181
Tank Vapor Space Volume:	40.4505
Vapor Space Volume (cu ft):	48.4585
Tank Diameter (ft): Vapor Space Outage (ft):	4.5000 3.0469
Tank Shell Height (ft):	5.0000
Average Liquid Height (ft):	2.0000
Roof Outage (ft):	0.0469
Roof Outage (Cone Roof)	
Roof Outage (ft):	0.0469
Roof Height (ft):	0.0000
Roof Slope (ft/ft):	0.0625
Shell Radius (ft):	2.2500
/apor Density	
Vapor Density (lb/cu ft):	0.0079
Vapor Molecular Weight (lb/lb-mole):	32.0400
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	1.3769
Daily Avg. Liquid Surface Temp. (deg. R):	518.2062
Daily Average Ambient Temp. (deg. F):	56.1542
Ideal Gas Constant R	00.1012
(psia cuft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	515.8442
Tank Paint Solar Absorptance (Shell):	0.1700
Tank Paint Solar Absorptance (Roof):	0.1700
Daily Total Solar Insulation	4 705 0407
Factor (Btu/sqft day):	1,765.3167
/apor Space Expansion Factor	0.4075
Vapor Space Expansion Factor:	0.1075
Daily Vapor Programs Range (deg. R):	28.5089 0.6255
Daily Vapor Pressure Range (psia): Breather Vent Press. Setting Range(psia):	0.0600
Vapor Pressure at Daily Average Liquid	0.0000
Surface Temperature (psia):	1.3769
Vapor Pressure at Daily Minimum Liquid	
Surface Temperature (psia):	1.0943
Vapor Pressure at Daily Maximum Liquid	4.7400
Surface Temperature (psia):	1.7198
Daily Avg. Liquid Surface Temp. (deg R): Daily Min. Liquid Surface Temp. (deg R):	518.2062 511.0790
Daily Max. Liquid Surface Temp. (deg R):	525.3334
Daily Ambient Temp. Range (deg. R):	27.9250
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.8181
Vapor Pressure at Daily Average Liquid:	
Surface Temperature (psia):	1.3769
Vapor Space Outage (ft):	3.0469
Working Losses (lb):	6.3024
WOLKING LOSSES (ID).	
Vapor Molecular Weight (lb/lb-mole):	32.0400

Surface Temperature (psia): Annual Net Throughput (gal/yr.): Annual Turnovers: Turnover Factor: Maximum Liquid Volume (gal): Maximum Liquid Height (ft): Tank Diameter (ft): Working Loss Product Factor:	1.3769 6,000.0000 12.0000 1.0000 500.0000 4.0000 4.5000 1.0000
---	---

Total Losses (lb): 18.6430

# TANKS 4.0.9d Emissions Report - Detail Format Individual Tank Emission Totals

**Emissions Report for: Annual** 

32-7 Methanol (500 gal) - Vertical Fixed Roof Tank Rio Arriba Co., T-32N, R-07W, Sec 34, NM

	Losses(lbs)					
Components	Working Loss Breathing Loss Total Emis					
Methyl alcohol	6.30	12.34	18.64			

# **Truck Loading Emissions Calculations**

Unit Number: L-1 (Insignificant source demonstration) Truck Loading - Produced Water Description:

#### **Emission Factor**

Saturation factor, S 0.6 AP-42, Table 5.2-1 (submerged loading

& dedicated service)

0.3619 psia True vapor pressure of liquid, P TANKS 4.0 output file for similar fixed roof tank 18.02 lb/lb-mole Molecular weight of vapors, M TANKS 4.0 output file for similar fixed roof tank 70 °F Temperature of liquid TANKS 4.0 output file for similar fixed roof tank

529.67 °R Temperature of liquid, T °F + 459.67  $0.09 \text{ lb/} 10^3 \text{ gal}$ 

Emission factor, L AP-42, Section 5.2, Equation 1

 $L = 12.46 \frac{SPM}{T}$ 

**Production Rate** 

8.40 10^3 gal/hr Maximum hourly production rate Harvest 1,302.00 10<sup>3</sup> gal/yr Maximum annual production rate Harvest

#### **Steady-State Emission Rates**

Pollutant	Uncontrolled E	Emission Rates,
	pph	tpy
VOC	0.77	5 99F-02

Uncontrolled Emission Rate (pph) = lb/10^3 gal x 10^3 gal/hr

Uncontrolled Emission Rate (tpy) = lb/10<sup>3</sup> gal x 10<sup>3</sup> gal/yr / 2,000 lb/ton

	Wt		
Pollutants	Fraction	Emission Rates,	
	of HAP	pph	tpy
Benzene	0.0267	2.07E-02	1.60E-03
Ethylbenzene	0.0027	2.07E-03	1.60E-04
n-Hexane	0.0840	6.49E-02	5.03E-03
Toluene	0.0344	2.66E-02	2.06E-03
m-Xylene	0.0229	1.77E-02	1.37E-03

Wt. Fraction of HAP = CDPHE/TCEQ Produced Water HAP emission factor (lb/bbl) / VOC emission factor (lb/bbl).

Emission rate, pph = Wt. Fraction of HAP x VOC Emission rate (pph)

Emission rate, tpy = Wt. Fraction of VOC x VOC Emission rate (tpy)

# Section 6.a

# **Green House Gas Emissions**

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

**Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC)** applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), methane (CH<sub>4</sub>), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>).

## **Calculating GHG Emissions:**

- 1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO<sub>2</sub>e emissions from your facility.
- **2.** GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO<sub>2</sub>e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
- 3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
- **4.** Report GHG mass and GHG CO<sub>2</sub>e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
- **5.** All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO2e emissions for each unit in Table 2-P.
- **6.** For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

#### **Sources for Calculating GHG Emissions:**

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at http://www.epa.gov/ttn/chief/ap42/index.html
- EPA's Internet emission factor database WebFIRE at http://cfpub.epa.gov/webfire/
- 40 CFR 98 <u>Mandatory Green House Gas Reporting</u> except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.
- API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.
- Sources listed on EPA's NSR Resources for Estimating GHG Emissions at http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases:

#### **Global Warming Potentials (GWP):**

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO<sub>2</sub> over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. (20.2.70.7 NMAC, 20.2.74.7 NMAC). You may also find GHGs defined in 40 CFR 86.1818-12(a).

#### **Metric to Short Ton Conversion:**

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.

1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

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# Greenhouse Gas (GHG) Emissions

Greenhouse gas (GHG) emissions are provided. Carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) emissions, nitrous oxide (N<sub>2</sub>O) (combustion sources only), and total GHG are reported in tons per year (tpy). Carbon dioxide equivalent (CO<sub>2</sub>e) emissions (including CO<sub>2</sub>, N<sub>2</sub>O and CH<sub>4</sub>) are reported in metric tonnes per year. The CO<sub>2</sub>e is calculated by summing the estimated CO<sub>2</sub> emissions with the CH<sub>4</sub> emissions (adjusted for the Global Warming Potential (GWP) of the CH<sub>4</sub>) and the N<sub>2</sub>O emissions (adjusted for the GWP of the N<sub>2</sub>O). The GWPs are from Title 40, Part 98 (40 CFR 98), *Mandatory Greenhouse Gas Reporting*, Table A-1.

The portion of 40 CFR 98, Table A-1 that includes the GWPs for CH<sub>4</sub> and N<sub>2</sub>O is included in Section 7. 40 CFR 98, Subpart A (including Table A-1) is available for download in its entirety through the U.S. Government Publications Office (GPO) website at <a href="http://ecfr.gpoaccess.gov/">http://ecfr.gpoaccess.gov/</a> under the "Code of Federal Regulations" link.

<u>Combustion Equipment GHG</u>. GHG emissions, including carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O) exhaust emissions from the combustion equipment (reciprocating internal combustion engines and the dehydrator reboilers) are calculated from emission factors from 40 CFR 98, Part C, Tables C-1 & C-2, and the engine higher heating value (HHV) design heat rate.

Emission factors and methodologies from 40 CFR 98, Table C-1 and C-2 are included in Section 7. 40 CFR 98, Subpart C (including Tables C-1 and C-2) is available for download in its entirety through the U.S. Government Publications Office (GPO) website at <a href="http://ecfr.gpoaccess.gov/">http://ecfr.gpoaccess.gov/</a> under the "Code of Federal Regulations" link.

Non-Combustion Equipment GHG (General). The non-combustion GHG emissions from the facility are based on 40 CFR 98, Subpart W, *Petroleum and Natural Gas Systems*, or an appropriate method published in the American Petroleum Institute's 2009 *Compendium of Greenhouse Gas Emission Estimates Methodologies for the Oil and Gas Industry* (API Compendium). The emission calculation methods is noted in the calculations spreadsheets.

40 CFR 98, Subpart W is published and available for download in its entirety through the U.S. Government Publications Office (GPO) website at <a href="http://ecfr.gpoaccess.gov/">http://ecfr.gpoaccess.gov/</a> under the "Code of Federal Regulations" link. The API Compendium in its entirety is available at <a href="http://www.api.org/environment-health-and-safety/climate-change/whats-new/compendium-ghg-methodologies-oil-and-gas-industry">http://www.api.org/environment-health-and-safety/climate-change/whats-new/compendium-ghg-methodologies-oil-and-gas-industry</a>. Excerpts of the cited 40 CFR 98 and API Compendium materials are provided in Section 7.

**Dehydrator Still Vent GHG.** Emissions of GHG from the dehydrator still vents are calculated in accordance with the methods of 40 CFR 98, subpart W, *Petroleum and Natural Gas Systems*, §98.233(e), including GRI-GLYCalc 4.0 emissions estimation software, the natural gas stream composition, and dehydrator operating parameters corresponding to the Potential To Emit emission calculations.

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**SSM Compressor Blowdown GHG.** Compressor blowdown emissions (Unit SSM), including emissions from SSM and compressor venting and associated piping, are calculated from the estimated total annual gas losses (scf/yr) and the molar fraction of CO<sub>2</sub> and CH<sub>4</sub> in the natural gas extended analysis. The SSM emissions are estimated from the annual blowdown volume of gas. The emission calculations are provided in this section. The extended gas analysis used in the emission estimates is in Section 7.

**Malfunction Emissions GHG.** GHG emissions from the malfunction VOC emissions (Unit M-1) are calculated based on the estimated total volume of annual gas (scf/yr) associated with the specified tpy of VOC emissions and the molar fractions of CO<sub>2</sub> and CH<sub>4</sub> in the natural gas extended analysis.

**Reciprocating Compressor Venting Emissions.** Annual GHG emissions from reciprocating compressor vented emissions, including compressor blowdown valve leaks, rod packing leaks and isolation valve leaks, are estimated from the number of compressors; the estimated compressor operating times; the CO<sub>2</sub> and CH<sub>4</sub> molar composition of the gas stream; and the density of the GHG gases according to 40 CFR 98, Subpart W, equation W-36.

Isolation valve leakage occurs when the compressors are not in operation, i.e., when the compressors operate zero hours. The GHG emissions from isolation valve leakage are less than the combined blowdown valve leakage and rod packing emissions that occur when compressor(s) are in operation. Therefore, the PTE is calculated assuming 8,760 hours per year of compressor operation (corresponding with isolation valve leakage occurring zero hours per year).

**Equipment Leaks Emissions.** GHG emissions from facility-wide equipment leaks (Unit F-1) are based on the estimated total annual gas losses (scf/yr) associated with the estimated number of components, the corresponding emission factors from the EPA's 1995 *Protocol for Equipment Leak Emission Estimates*, and the molar fraction of CO<sub>2</sub> and CH<sub>4</sub> contained in the natural gas extended analysis.

Natural Gas Driven Pneumatic Device Venting Emissions and Natural Gas Driven Pneumatic Pump Venting Emissions. Gas-driven pneumatic device and pneumatic pump emissions are calculated from the facility gas stream composition for CO<sub>2</sub> and CH<sub>4</sub>, the estimated number of devices, and the appropriate emission factors from 40 CFR 98, Subpart W, Table W-1A (Western U.S. - Gas Service).

**Storage Tank and Truck Loading GHG.** GHG emissions from the working and breathing losses from the produced water, waste water, lube oil and used lube oil, TEG, antifreeze and solvent storage tanks are considered to be zero, based on the stored contents are either non-flashing liquids or post-flashed liquid.

Similarly, any liquids transferred during truck loading do not contain appreciable amounts of any gases, including GHG.

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(Based on updated gas sample)

	Facility Total Emissions							
Sources	CO2,	CH4,	N2O,	GHG,	CO2e,			
	tpy	tpy	tpy	tpy	tpy			
Engine & Turbine Exhaust Emissions	102,177.70	1.93E+00	1.93E-01	102,179.82	102283.23			
SSM Emissions	206.58	1,076.04		1,282.63	27107.60			
Reciprocating Compressor Venting Emissions	196.97	1,027.55		1,224.52	25885.66			
Dehydrator Emissions	398.76	960.39		1,359.14	24408.42			
Reboiler Exhaust Emissions	4,605.67	8.68E-02	8.68E-03	4,605.76	4610.42			
Equipment Leak Emissions	7.51	39.18		46.69	986.93			
Natural Gas Pneumatic Device Venting Emissions	40.08	208.59		248.67	5254.79			
Natural Gas Driven Pneumatic Pump Venting Emissions	0.44	2.29		2.73	57.63			
Malfunction Emissions	1881.25	9798.92		11680.17	246854.24			
Storage Tank Emissions	0.00	0.00		0.00	0.00			
Total	109,514.96	13,114.96	2.01E-01	122,630.12	437,448.92			

# **Engine & Turbine Exhaust Emissions**

Unit		Е	mission Factor	S		Emission Rates	3
Numbers	Description	CO2,	CH4,	N2O,	CO2,	CH4,	N2O,
		kg/MMBtu	kg/MMBtu	kg/MMBtu	tpy	tpy	tpy
1	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
2	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
3	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
4	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
5	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
6	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
7	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
8	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
13	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
15	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
16	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
18	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
19	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
20	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
21	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
22	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
23	7042GL engine	53.06	1.00E-03	1.00E-04	6,010.45	0.11	1.13E-02
	Total				102,177.70	1.93	1.93E-01

The emissions factors are taken from 40 CFR 98, Subpart C, Tables C-1 & C-2 Emission Rates (tpy) = kg/MMBtu x 2.2 lb/kg x MMBtu/yr / 2,000 lb/ton

				LHV	HI	-IV
Unit			Operating	Design	Design	Fuel
Numbers	Description	Fuel Types	Times,	Heat Rates,	Heat Rates,	Usages,
			hr/yr	MMBtu/hr	MMBtu/hr	MMBtu/yr
1	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
2	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
3	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
4	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
5	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
6	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
7	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
8	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
13	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
15	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
16	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
18	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
19	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
20	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
21	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
22	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979
23	7042GL engine	Nat. Gas	8,760	10.58	11.76	102,979

The fuel types and operating times are provided by Williams

The LHV design heat rates are taken from manufacturers data

HHV Design Heat Rates (MMBtu/hr) = LHV Design Heat Rates (MMBtu/hr) / 0.9 LHV/HHV

HHV Fuel Usages (MMBtu/yr) = HHV Design Heat Rates (MMBtu/hr) x hr/yr

(Based on updated gas sample)

#### **SSM Emissions**

			CO2	CH4		
Unit		Total	Emission	Emission	Emissio	n Rates
Numbers	Description	Gas Losses,	Factors,	Factors,	CO2,	CH4,
		scf/yr	lb/scf	lb/scf	tpy	tpy
SSM	SSM	54,757,000	0.0075	0.0393	206.58	1,076.04

The annual blowdown volumes are calculated from data provided by Williams

The CO2 and CH4 emission factors are calculated from the facility extended gas analysis

Emission Rates (tpy) = scf/yr x lb/scf / 2,000 lb/ton

# **Reciprocating Compressor Venting Emissions**

Unit		Emissio	n Rates
Numbers	Description	CO2,	CH4,
		tpy	tpy
NA	Blowdown Valve Leakage	18.82	98.15
NA	Rod Packing Emissions	178.16	929.39
NA	Isolation Valve Leakage	0.00	0.00
	Total	196.97	1027.55

Operating or standby mode - includes blowdown valve leakage through blowdown vent stack

Operating mode - includes rod packing emissions

Non-operating depressurized mode - includes isolation valve leakage through open blowdown vents (without blind flanges)

Rod packing gas emissions assume 4 cylinders per compressor

A combination of equations W-26 & W-36 (Subpart W) is used to calculate reciprocating compressor emissions

As the NMED requires CO2 & CH4 emissions rather than CO2e emissions, it is not necessary to include the global warming potential from equation W-36

CO2 Emission Rates (tpy) = # x scf/hr x hr/yr x (CO2 Mole Percent (%) / 100) x CO2 Density (kg/scf)

x (2,204.6 lb/tonne / 2,000 lb/ton) / 1,000 kg/tonne

CH4 Emission Rates (tpy) = # x scf/hr x hr/yr x (CH4 Mole Percent (%) / 100) x CH4 Density (kg/scf)

x (2,204.6 lb/tonne / 2,000 lb/ton) / 1,000 kg/tonne

Unit		Number of	Gas	Operating	CO2 Mole	CH4 Mole	CO2	CH4
Numbers	Description	Compressors	Emissions,	Times,	Percents,	Percents,	Density,	Density,
		#	scf/hr	hr/yr	%	%	kg/scf	kg/scf
NA	Blowdown Valve Leakage	17	33.5	8,760	6.50	92.96	0.0526	0.0192
NA	Rod Packing Emissions	17	317.2	8,760	6.50	92.96	0.0526	0.0192
NA	Blowdown Valve Leakage (St	17	10.5	0	6.50	92.96	0.0526	0.0192

The number of compressors are provided by Williams

Blowdown valve leakage (33.5 scf/hr) and rod packing emissions occur in operating mode

Blowdown valve leakage (10.5 scf/hr) occurs in standby pressurized mode

Emission factors are the three year rolling average (2012-2014) of all measurements in the Williams Field Services, LLC compressor fleet located at natural gas processing plants

The operating times (the average operating times for all station compressors combined) are provided by Williams

The facility CO2 and CH4 contents are taken from the facility extended gas analysis

The CO2 & CH4 densities (kg/scf) are taken from Subpart W, Paragraph 98.233(v)

(Based on updated gas sample)

# **Dehydrator Emissions**

Unit		Emissio	n Rates
Numbers	Description	CO2,	CH4,
		tpy	tpy
9a	Dehydrator (12 mmscfd)	66.58	159.23
10a	Dehydrator (12 mmscfd)	66.58	159.23
11a	Dehydrator (20 mmscfd)	66.40	160.48
12a	Dehydrator (20 mmscfd)	66.40	160.48
24a	Dehydrator (20 mmscfd)	66.40	160.48
25a	Dehydrator (20 mmscfd)	66.40	160.48
	Total	398.76	960.39

The emission rates are taken from the GRI-GLYCalc output file

# **Reboiler Exhaust Emissions**

Unit		E	mission Factor	'S	Emission Rates			
Numbers	Description	CO2,	CH4,	N2O,	CO2,	CH4,	N2O,	
		kg/MMBtu	kg/MMBtu	kg/MMBtu	tpy	tpy	tpy	
9b	Reboiler (1208 scfh)	53.06	1.00E-03	1.00E-04	617.63	1.16E-02	1.16E-03	
10b	Reboiler (1208 scfh)	53.06	1.00E-03	1.00E-04	617.63	1.16E-02	1.16E-03	
11b	Reboiler (1648 scfh)	53.06	1.00E-03	1.00E-04	842.60	1.59E-02	1.59E-03	
12b	Reboiler (1648 scfh)	53.06	1.00E-03	1.00E-04	842.60	1.59E-02	1.59E-03	
24b	Reboiler (1648 scfh)	53.06	1.00E-03	1.00E-04	842.60	1.59E-02	1.59E-03	
25b	Reboiler (1648 scfh)	53.06	1.00E-03	1.00E-04	842.60	1.59E-02	1.59E-03	
	Total				4,605.67	8.68E-02	8.68E-03	

The emissions factors are taken from 40 CFR 98, Subpart C, Tables C-1 & C-2 Emission Rates (tpy) =  $kg/MMBtu \times 2.2 lb/kg \times MMBtu/yr / 2,000 lb/ton$ 

					LHV		HHV		
Unit			Operating	Fuel	Fuel Heat	Fuel	Fuel	Fuel	
Numbers	Description	Fuel Types	Times	Usages,	Contents,	Usages,	Usages,	Usages,	
			hr/yr	scf/hr	Btu/scf	MMBtu/hr	MMBtu/hr	MMBtu/yr	
9b	Reboiler (1208 scfh)	Nat. Gas	8,760	1,208	900	1.09	1.21	10,582	
10b	Reboiler (1208 scfh)	Nat. Gas	8,760	1,208	900	1.09	1.21	10,582	
11b	Reboiler (1648 scfh)	Nat. Gas	8,760	1,648	900	1.48	1.65	14,436	
12b	Reboiler (1648 scfh)	Nat. Gas	8,760	1,648	900	1.48	1.65	14,436	
24b	Reboiler (1648 scfh)	Nat. Gas	8,760	1,648	900	1.48	1.65	14,436	
25b	Reboiler (1648 scfh)	Nat. Gas	8,760	1,648	900	1.48	1.65	14,436	

The fuel types and operating times are provided by Williams

The LHV fuel usages (scf/hr) are taken from manufacturer's data

The LHV fuel heat contents are estimated based on the value typically used by manufacturers

LHV Fuel Usages (MMBtu/hr) = LHV Fuel Usages (scf/hr) x Btu/scf / 1,000,000 Btu/MMBtu

HHV Fuel Usages (MMBtu/hr) = LHV Fuel Usages (MMBtu/hr) / 0.9 LHV/HHV

HHV Fuel Usages (MMBtu/yr) = HHV Fuel Usages (MMBtu/hr) x hr/yr

(Based on updated gas sample)

## **Equipment Leaks Emissions**

Unit			Emission Rates			
Numbers	Description		CO2,	CH4,		
			tpy	tpy		
NA	Valves		5.5	28.5		
NA	Connectors		0.9	4.5		
NA	Open-Ended Lines		0.4	2.0		
NA	Pressure Relief Valves		0.8	4.2		
		Total	7.51	39.18		

A combination of equations W-31 & W-36 (Subpart W) is used to calculate uncombusted CO2 & CH4 emissions

As the NMED requires CO2 & CH4 emissions rather than CO2e emissions, it is not necessary to include the global warming potential from equation W-36

CO2 Emission Rate (tpy) = # x scf/hr/component x (CO2 Content (mole %) / 100) x hr/yr x CO2 Density (kg/scf)

x (2,204.6 lb/tonne / 2,000 lb/ton) / 1,000 kg/tonne

CH4 Emission Rate (tpy) = # x scf/hr/component x (CH4 Content (mole %) / 100) x hr/yr x CH4 Density (kg/scf)

x (2,204.6 lb/tonne / 2,000 lb/ton) / 1,000 kg/tonne

			Emission					
Unit		Number of	Factors,	CO2	CH4	Operating	CO2	CH4
Numbers	Description	Components,	scf/hr	Contents,	Contents,	Times,	Density,	Density,
		#	/component	mole %	mole %	hr/yr	kg/scf	kg/scf
NA	Valves	1368	0.121	6.50	92.96	8,760	0.0526	0.0192
NA	Connectors	1523	0.017	6.50	92.96	8,760	0.0526	0.0192
NA	Open-Ended Lines	367	0.031	6.50	92.96	8,760	0.0526	0.0192
NA	Pressure Relief Valves	127	0.193	6.50	92.96	8,760	0.0526	0.0192

The number of sources are calculated based on the number of compressors and dehydrators at the station (see criteria pollutant and HAP equipment leaks calculations)

The emission factors are taken from Subpart W, Table W-1A (Western U.S. - Gas Service)

The facility CO2 and CH4 contents are taken from the facility extended gas analysis

The operating times are provided by Williams (default is the entire year)

The CO2 & CH4 densities are taken from Subpart W, Paragraph 98.233(v)

# **Natural Gas Pneumatic Device Venting Emissions**

Unit		Number	Emission	Operating	Emissio	n Rates
Numbers	Description	of Devices,	Factors,	Times,	CO2,	CH4,
		#	scf/hr/device	hr/yr	tpy	tpy
NA	Continuous High Bleed Pneumatic Devices	2	37.3	8,760	2.47	12.83
NA	Intermittent Bleed Pneumatic Devices	84	13.5	8,760	37.48	195.04
NA	Continuous Low Bleed Pneumatic Devices	3	1.39	8,760	0.14	0.72
	Total				40.08	208.59

The number of devices are provided by Williams

The emission factors are taken from Subpart W, Table W-1A (Western U.S. - Gas Service)

The operating times are provided by Williams

Equation W-1 (Subpart W) is used to calculate CO2 & CH4 emissions

As the NMED requires CO2 & CH4 emissions in addition to CO2e emissions, it is necessary to divide by the global warming potentials CO2 Emission Rates (tpy) = # x scf/hr/device x (CO2 Content (mole %) / 100) x CO2 Conversion Factors (tonne CO2e/scf) x hr/yr

x (2,204.6 lb/tonne / 2,000 lb/ton) / CO2 Global Warming Potentials (tonne CO2e/tonne CO2)

CH4 Emission Rates (tpy) = # x scf/hr/device x (CH4 Contents (mole %) / 100) x CH4 Conversion Factors (tonne CO2e/scf) x hr/yr x (2,204.6 lb/tonne / 2,000 lb/ton) / CH4 Global Warming Potentials (tonne CO2e/tonne CH4)

				CO2	CH4	CO2 Global	CH4 Global
				Conversion	Conversion	Warming	Warming
Unit		CO2	CH4	Factors,	Factors,	Potentials,	Potentials,
Numbers	Description	Contents,	Contents,	tonne CO2e	tonne CO2e	tonne CO2e	tonne CO2e
		mole %	mole %	/scf	/scf	/tonne CO2	/tonne CH4
NA	Continuous High Bleed Pneumatic Devices	6.50	92.96	5.262E-05	4.790E-04	1	25
NA	Continuous Low Bleed Pneumatic Devices	6.50	92.96	5.262E-05	4.790E-04	1	25
NA	Intermittent Bleed Pneumatic Devices	6.50	92.96	5.262E-05	4.790E-04	1	25

The facility CO2 and CH4 contents are taken from the facility extended gas analysis

The conversion factors are taken from Subpart W, Paragraph 98.233(a)

The global warming potentials are taken from 40 CFR Part 98, Table A-1

(Based on updated gas sample)

# **Natural Gas Driven Pneumatic Pump Venting Emissions**

#### **Emission Rates**

Unit		Number	Emission	Operating	Emissio	n Rates
Number	Description	of Pumps,	Factor,	Time,	CO2,	CH4,
		#	scf/hr/pump	hr/yr	tpy	tpy
NA	Pneumatic Pump Venting	1	13.3	8,760	0.44	2.29

The number of pumps are provided by Williams

Equation W-2 (Subpart W) is used to calculate CO2 & CH4 emissions

As the NMED requires CO2 & CH4 emissions in addition to CO2e emissions, it is necessary to divide by the global warming potentials CO2 Emission Rate (tpy) = # x scf/hr/pump x (CO2 Content (mole %) / 100) x CO2 Conversion Factor (tonne CO2e/scf) x hr/yr x (2,204.6 lb/tonne / 2,000 lb/ton) / CO2 Global Warming Potentials (tonne CO2e/tonne CO2)

CH4 Emission Rate (tpy) = # x scf/hr/pump x (CH4 Content (mole %) / 100) x CH4 Conversion Factor (tonne CO2e/scf) x hr/yr x (2,204.6 lb/tonne / 2,000 lb/ton) / CH4 Global Warming Potentials (tonne CO2e/tonne CH4)

				CO2	CH4	CO2 Global	CH4 Global
				Conversion	Conversion	Warming	Warming
Unit		CO2	CH4	Factor,	Factor,	Potential,	Potential,
Numbe	er Description	Content,	Content,	tonne CO2e	tonne CO2e	tonne CO2e	tonne CO2e
		mole %	mole %	/scf	/scf	/tonne CO2	/tonne CH4
NA	Pneumatic Pump Venting	6.50	92.96	5.262E-05	4.790E-04	1	25

The facility CO2 and CH4 contents are taken from the facility extended gas analysis

## **Malfunction Emissions**

Unit			Emission Rates	3
Number	Description	VOC,	CO2,	CH4,
		tpy	tpy	tpy
M-1	Malfunctions	10.00	1,881.25	9,798.92

The VOC emission rate is estimated (see calculations workbook)

CO2 Emission Rate (tpy) = VOC Emission Rate (tpy) x (Total Component Weight (lb/lb-mole) / VOC Component Weight (lb-lb-mole)) x (CO2 Weight % of Total (%) / 100)

CH4 Emission Rate (tpy) = VOC Emission Rate (tpy) x (Total Component Weight (lb/lb-mole) / VOC Component Weight (lb-lb-mole)) x (CH4 Weight % of Total (%) / 100)

		Total	VOC	CO2	CH4
Unit		Component	Component	Weight %	Weight %
Number	Description	Weight,	Weight,	of Total,	of Total,
		lb/lb-mole	lb/lb-mole	%	%
M-1	Malfunctions	17.94	0.02	15.96	83.12

The total & VOC component weights and CO2 & CH4 weight % of totals are calculated from the facility extended gas analysis

# **Storage Tank Emissions**

Unit		Emissio	n Rates
Number	Description	CO2,	CH4,
		tpy	tpy
	Storage Tanks (all)	0.00	0.00
	Tota	0.00	0.00

The emission factor is taken from Subpart W, Table W-1A (Western U.S. - Gas Service)

The operating time is provided by Williams (default is the entire year)

The conversion factors are taken from Subpart W, Paragraph 98.233(a)

The operating time is provided by Williams (the default is the entire year)

The global warming potentials are taken from 40 CFR Part 98, Table A-1

(Based on updated gas sample)

# **Gas Stream Composition**

				Weight	
	Mole	Molecular	Component	Percent	Emission
Components	Percents,	Weights,	Weights,	of Total,	Factors,
	%	lb/lb-mole	lb/lb-mole	%	lb/scf
Carbon Dioxide	6.5048	44.01	2.86	15.9585	0.0075
Hydrogen Sulfide	0.0000	34.07	0.00	0.0000	0.0000
Nitrogen	0.0897	28.01	0.03	0.1401	0.0001
Methane	92.9634	16.04	14.91	83.1232	0.0393
Ethane	0.4137	30.07	0.12	0.6935	0.0003
Propane	0.0159	44.09	0.01	0.0391	0.0000
IsoButane	0.0041	58.12	0.00	0.0133	0.0000
Normal Butane	0.0022	58.12	0.00	0.0071	0.0000
IsoPentane	0.0054	72.15	0.00	0.0217	0.0000
Normal Pentane	0.0009	72.15	0.00	0.0036	0.0000
Cyclopentane	0.0000	70.14	0.00	0.0000	0.0000
n-Hexane	0.0000	86.17	0.00	0.0000	0.0000
Cyclohexane	0.0000	84.16	0.00	0.0000	0.0000
Other Hexanes	0.0000	86.18	0.00	0.0000	0.0000
Heptanes	0.0000	100.20	0.00	0.0000	0.0000
Methylcyclohexane	0.0000	98.19	0.00	0.0000	0.0000
2,2,4-Trimethylpentane	0.0000	100.21	0.00	0.0000	0.0000
Benzene	0.0000	78.11	0.00	0.0000	0.0000
Toluene	0.0000	92.14	0.00	0.0000	0.0000
Ethylbenzene	0.0000	106.17	0.00	0.0000	0.0000
Xylenes	0.0000	106.17	0.00	0.0000	0.0000
C8+ heavies	0.0000	110.00	0.00	0.0000	0.0000
Total	100.0001		17.94	100.0000	0.0473
VOC			0.02		0.0000

Gas stream composition obtained from the 32-7 CDP extended gas analysis dated June 19, 2018.

Component Weights (lb/lb-mole) = [Mole Percents (%) / 100] x Molecular Weights (lb/lb-mole)

Weight Percent of Total (%) = 100 x Component Weights (lb/lb-mole) / Total Component Weight (lb/lb-mole)

Emission Factors (lb/scf) = [Mole Percents (%) / 100] x Molecular Weights (lb/lb-mole) / 379.4 scf/lb-mole

# **Section 7**

Oct. 2019; Rev.0

# **Information Used To Determine Emissions**

#### <u>Information Used to Determine Emissions</u> shall include the following:

- If manufacturer data are used, include specifications for emissions units <u>and</u> control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
- ☐ If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
- If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
- $\square$  If an older version of AP-42 is used, include a complete copy of the section.
- If an EPA document or other material is referenced, include a complete copy.
- $\overline{\mathbf{X}}$  Fuel specifications sheet.
- If computer models are used to estimate emissions, include an input summary (if available) and a detailed report, and a disk containing the input file(s) used to run the model. For tank-flashing emissions, include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., permit or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.

Please see the following pages.

# STANDARD EQUIPMENT

AIR CLEANER - Two, dry type with rain shield and service indicator.

BARRING DEVICE - Manual.

BEARINGS - Heavy duty, replaceable, precision type.

BREATHER - Closed system.

CONNECTING RODS - Drop forged steel, rifle drilled.

CONTROL SYSTEM – Pneumatic. Includes pilot operated valves for air start and prelube. Engine mounted control panel with two push button valves. Pilot operated air start valves omitted when starter is not furnished by Waukesha. Includes engine On/Off push button. One mounted on either side of the engine.

CRANKCASE – Integral crankcase and cylinder frame. Main bearing caps drilled and tapped for temperature sensors. Does not include sensors.

CRANKSHAFT - Counterweighted, forged steel, seven main bearings, and dynamically balanced.

CYLINDERS - Removable wet type cylinder liners, chrome plated on outer diameter. Induction hardened.

CYLINDER HEADS – Twelve interchangeable. Two hard faced intake and two hard faced exhaust valves per cylinder. Hard faced intake and exhaust valve seat inserts. Roller valve lifters and hydraulic push rods. Includes prechamber and related fuel control valves.

ENGINE ROTATION - Counterclockwise when facing flywheel.

ENGINE MONITORING DEVICES – Engine thermocouples, K-type, for jacket water temperature, lube oil temperature, intake manifold temperature, individual cylinder exhaust temperature and a common pre turbine temperatures, one on each bank. Magnetic pickup wired for customer supplied tachometer. Lube oil pressure and intake manifold pressure sensing lines are terminated in a common bulk head.

EXHAUST OUTLET – Single vertical at rear. Flexible stainless steel connection with 8" (203 mm) pipe flange.

FLYWHEEL – Approx. WR<sup>2</sup> = 155000 lb-in<sup>2</sup>; with ring gear (208 teeth), machined to accept two drive adapters: 31.88" (810 mm) pilot bore, 30.25" (768 mm) bolt circle, (12) 0.75"–10 tapped holes; or 28.88" (734 mm) pilot bore, 27.25" (692 mm) bolt circle, (12) 0.625"–11 tapped holes and (12) 0.75"–10 tapped holes.

FLYWHEEL HOUSING - No. 00 SAE.

FUEL SYSTEM - Dual natural gas, 4" (102 mm) duplex updraft carburetors. Two Fisher Model 99, 2" (51 mm) gas regulators,

30 - 50 psi (241 - 345 kPa) gas inlet pressure required. Prechamber fuel system and control logic.

GOVERNOR - Woodward UG-8 LD hydraulic lever type, with friction type speed control. Mounted on right hand side.

IGNITION – Waukesha Custom Engine Control Ignition Module. Electronic digital ignition system. 24V DC power required.

INTERCOOLER - Air-to-water.

**LEVELING BOLTS** 

LIFTING EYES

**LUBRICATION** – Full pressure. Gear type pump. Full flow filter, 36 gallon (136 litres) capacity, not mounted. Includes flexible connections. Includes lube oil strainer, mounted on engine. Air/gas motor driven prelube pump. Requires final piping.

MANIFOLDS - Exhaust, (2) water cooled.

OIL COOLER - With thermostatic temperature controller and pressure regulating valve. Not mounted.

OIL PAN - Base type. 90 gallon (340 litres) capacity including filter and cooler.

PAINT - Oilfield orange primer.

PISTONS - Aluminum with floating pin. 10.5:1 compression ratio. Oil cooled.

SHIPPING SKID - Steel for domestic truck or rail.

TURBOCHARGERS - Two, dry type. Wastegate controlled.

VIBRATION DAMPER - Two, viscous type. Guard included with remote mounted radiator or no radiator.

#### WATER CIRCULATING SYSTEM

**Auxiliary Circuit** – For oil cooler and intercooler. Pump is belt driven from crankshaft pulley. Includes thermostatic valve.

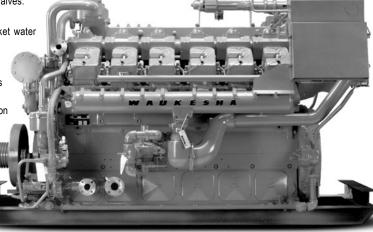
Engine Jacket – Belt driven water circulating pump, cluster type thermostatic temperature regulating valve, full flow bypass type. Flange connections and mating flanges for (2) 4" (102 mm) inlets and (1) 5" (127 mm) outlet.

WAUKESHA CUSTOM ENGINE CONTROL, DETONATION SENSING MODULE (DSM) – Includes individual cylinder sensors, Detonation Sensing Module, filter and cables. Device is compatible with Waukesha CEC Ignition Module only. Sensors are mounted and wired to engine junction box. Detonation Sensing Module and filter are shipped loose. One 11 ft. cable provided for connection between engine junction box and filter. One each 15 ft. cable provided for connection between filter and DSM and Ignition Module and DSM. One 20 ft. cable provided for power and ground for filter. All cables are shipped loose. Packager is responsible for power supply and ground to the DSM. 24V DC power is required. The DSM meets Canadian Standards Association Class 1, Group D, Division 2, hazardous location requirements.



# L7042GL

VHP<sup>™</sup> Series Gas Engine 886 - 1547 BHP



**Model L7042GL** Turbocharged and Intercooled, Twelve Cylinder, Lean Combustion, Four-Cycle Gas Engine

# **SPECIFICATIONS**

Cylinders V 12

Piston Displacement 7040 cu. in.

(115 L)

Bore & Stroke 9.375" x 8.5" (238 x 216 mm)

Compression Ratio 10.5:1

Jacket Water System Capacity 107 gal. (405 L)

Lube Oil Capacity 90 gal. (340 L) Starting System

125 - 150 psi air/gas 24/32V electric

**Dry Weight** 21,000 lb. (9525 kg)

Full Load Exhaust Emissions

> Nox - 1.50 g/bhp-hr CO - 2.65 g/bhp-hr HC - 1.00 g/bhp-hr



#### POWER RATINGS: L7042GL VHP SERIES GAS ENGINES

		Brake Horsepower (kWb Output)					
Model	I.C. Water Inlet Temp. °F (°C) (Tcra)	C.R.	800 rpm	900 rpm	1000 rpm	1100 rpm	1200 rpm
High Speed Turbo <sup>1</sup>	85° (29°)	10.5:1	928 (692)	1160 (865)	1289 (961)	1418 (1057)	1547 (1154)
High Speed Turbo <sup>1</sup>	130° (54°)	10.5:1	886 (661)	1108 (826)	1232 (919)	1355 (1010)	1478 (1102)
Low Speed Turbo <sup>2</sup>	85° (29°)	10.5:1	1031 (769)	1160 (865)	1289 (961)		
Low Speed Turbo <sup>2</sup>	130° (54°)	10.5:1	985 (735)	1108 (826)	1232 (919)		

<sup>&</sup>lt;sup>1</sup>High speed turbocharger match - 1001-1200 rpm

Rating Standard: All models: Ratings are based on ISO 3046/1-1995 with mechanical efficiency of 90% and auxiliary water temperature Tcra (clause 10.1) as specified above limited to ± 10° F (± 5° C). Ratings are also valid for SAE J1349, BS5514, DIN6271 and AP17B-11C standard atmospheric conditions.

ISO Standard Power/Continuous Power Rating: The highest load and speed which can be applied 24 hours a day, seven days a week, 365 days per year except for normal maintenance. It is permissible to operate the engine at up to 10% overload, or maximum load indicated by the intermittent rating, whichever is lower, for two hours in each 24 hour period.

All natural gas engine ratings are based on a fuel of 900 Btu/ft³ (35.3 MJ/nm³) SLHV value, with a 91 Waukesha Knock Index®.

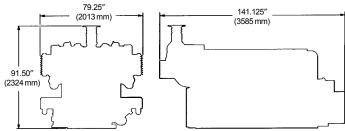
For conditions or fuels other than standard, the Waukesha Engine Sales Engineering Department.

#### PERFORMANCE: L7042GL VHP SERIES GAS ENGINES

<u> </u>	,	. •=:	<u> </u>	10 -11	<u> </u>						
	English	130°	F ICW	85° F	ICW	Metric		54° C ICW		29° C ICW	
	RPM	1200	1000	1200	1000		RPM	1200	1000	1200	1000
	Power (Bhp)	1478	1232	1547	1289		Power (kWb)	1103	919	1154	962
	BSFC (Btu/bhp-hr)	7155	6815	7180	6840	,	BSFC (kJ/kW-hr)	10124	9643	10160	9679
Low NO <sub>x</sub> Settings	NOx (grams/bhp-hr)	0.90	0.90	0.70	0.70	Low NO <sub>x</sub> Settings	NOx (g/nm³)	0.37	0.37	0.29	0.29
Low	CO (grams/bhp-hr)	2.75	2.65	2.65	2.55	Low	CO (g/nm³)	1.14	1.10	1.10	1.05
	NMHC (grams/bhphr)	1.00	1.00	1.10	1.10		NMHC (g/nm³)	0.41	0.41	0.45	0.45
L	BSFC (Btu/bhp-hr)	6910	6615	6935	6640	l Uo	BSFC (kJ/kW-hr)	9778	9360	9813	9396
Fuel mption ings	NOx (grams/bhp-hr)	1.50	1.60	1.30	1.40	⁻ue npti ngs	NOx (g/nm³)	0.62	0.66	0.54	0.58
Low F Consun Settir	CO (grams/bhp-hr)	3.00	2.75	2.90	2.65	Low Fonsur Settii	CO (g/nm³)	1.24	1.14	1.20	1.10
_ 3	NMHC (grams/bhphr)	0.70	1.00	0.80	1.10	_8	NMHC (g/nm³)	0.29	0.41	0.33	0.45

#### NOTES:

- Performance ratings are based on ISO 3046/1-1995 with mechanical efficiency of 90% and Tora limited to ± 10° F.
- Fuel consumptions based on ISO 3046/1-1995 with a +5% tolerance for commercial quality natural gas having a 900 Btu/ft<sup>3</sup> saturated low heat value.
- Data based on standard conditions of 77° F (25° C) ambient temperature, 29.53 gi.50" inches Hg (100kPa) barometric pressure, 30% relative humidity (0.3 inches Hg / (2324 mm))
   kPa water vapor pressure).
- 4) Data will vary due to variations in site conditions. For conditions and/or fuels other than standard, consult the Waukesha Engine Sales Engineering Department.





WAUKESHA ENGINE DRESSER, INC.

1000 West St. Paul Avenue Waukesha, WI 53188-4999

Phone: (262) 547-3311 Fax: (262) 549-2795

waukeshaengine.dresser.com Bulletin 7005 0102 WAUKESHA ENGINE
DRESSER INDUSTRIAL PRODUCTS, B.V.
Farmsumerweg 43, Postbus 330

9900 AH Appingedam, The Netherlands Phone: (31) 596-652222 Fax: (31) 596-628111 Consult your local Waukesha Distributor for system application assistance. The manufacturer reserves the right to change or modify without notice, the design or equipment specifications as herein set forth without incurring any obligation either with respect to equipment previously sold or in the process of construction except where otherwise specifically guaranteed by the manufacturer.

<sup>&</sup>lt;sup>2</sup>Low speed turbocharger match - 700-1000 rpm



## Waukesha-Pearce Industries, Inc. - Houston, Texas

#### **EMISSIONS CALCULATION FORMULAS**

DATE: 03/17/04

CUSTOMER: Hanover MODEL: Waukesha L 7042 GL ENGINE OR CONVERTER OUTPUT DATA **ASSUMED** CALC CALC PPM, PPM. APPROX EXH H<sub>2</sub>0 SCFH/HP **DSCFM** EXH FUEL BTU **FUEL USED** Mfg BSFC Ft/3 - HHV Ft/3 - HR NO, 02 % LHV ENG HP @ H<sub>2</sub>O % CO % 128.6 48.1 9.8 1,015 11,525 7,155 1,478 10.0 147 3,269 Rich Burn Exhaust ~ LO % is: Fuel Rich=21 Stoke=19 Fuel Lean=17 Oxygen Correction Factor % (if allowed) Lean Burn Exhaust ~ HO % is 13% - 10% depending on AFR CALC **EXHAUST FLOW - CALCULATION AREA** EITHER / OR SCFM EXH FLOW - ACFM OR 8,165 DO NOT PUT DATA IN LBS/HR AREA ======> NOT BOTH 3,632 0 EXH FLOW - LBS/HR 709 ۰F EXH TEMP

## IMPORTANT: SEE NOTE BELOW

# Oxygen Content Indicates Lean Burn Engine - Enter Correct H2O % and Exhaust Flow Data Above

Based on Exhaust Flow

CARB 1-100 METHOD					
NO <sub>x</sub>	со				
3.02	0.69				
lbs/hr	lbs/hr				
0.93	0.21				
g/BHP-Hr	g/BHP-Hr				
13.2	3.0				
TPY	TPY				

Based on Engine Heat Rate

TCEQ METHOD							
NO <sub>x</sub>	co						
2.99	0.68						
lbs/hr	lbs/hr						
0.92	0.21						
g/BHP-Hr	g/BHP-Hr						
13.1	3.0						
TPY	TPY						

Based on Fuel Consumption

EPA Method 19					
NO <sub>x</sub>	со				
2.95	0.67				
lbs/hr	lbs/hr				
0.90	0.21				
g/BHP-Hr	g/BHP-Hr				
12.9	2.9				
TPY	TPY				

Calculated Data		
CH₂O		
0.07		
lbs/hr		
0.02		
g/BHP-Hr		
0.3		
TPY		

	A CONTRACT OF THE PROPERTY OF THE PARTY OF T	PROPERTY AND ANY SERVICE SERVI	AND THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER.	A CONTRACTOR OF THE PARTY OF TH
WPI Powerhouse ®	COMBO	672	Oxidation	Converter no AFR
WIT TOWELHOUSE	001000		OZET CO OT OTI	00111011011

Note: (1) TNRCC method returns g/BHP-Hr without requiring HP. CARB and EPA M-19 return lb/hr. Each Method is calculated separately

(2) g/BHP-Hr = lb/hr / (HP x 0.002205). [0.002205 is reciprocal of 453.6 g/ll

(3) Calculate engine HP using software based on engine data inputs - i.e. intake manif pressure, RPM, CID, etc and confirm load via compressor or generator loading programs to support data

(4) Assumed heating value of fuel is 1,015 - typical CQNG - unless indicated otherwise above

Note: Any one of the above three methods should return approximately the same values with similar / equal input values lif the output data between the methods is not close, then the input data may be incorrec

<sup>© 2001 -</sup> Waukesha-Pearce Industries, Inc., Houston, Texas



#### Waukesha-Pearce Industries, Inc.

P.O. Box 35068 - 12320 S. Main - Houston, TX 77235-5068

Phone: 713-723-1050 - Fax: 713-551-0799 - Direct: 713-551-0330

#### LIMITED WARRANTY STATEMENT - OXIDATION CONVERTER

Waukesha-Pearce Industries, Inc. ("WPI") strictly for the period stated warrants, subject to all terms and conditions herein, that the WPI® Powerhouse ® Catalytic Converter furnished, when operated in accordance with the engine exhaust conditions stated below, will reduce CO & CE by 93.0%, & NMHC by 79.0%.

#### ENGINE EXHAUST CONDITIONS

- \* Maximum CO from engine will not exceed 2.8 g/BHP-Hr.
- \* Maximum CH2O from engine will not exceed 0.3 g/BHP-Hr.
- \* Temperature of exhaust into the catalyst will be 550°F minimum to 1250°F maximum.
- \* Engine will have oxygen content in the exhaust in excess of 4%.
- \* Combustibles content (i.e. unburned fuel) will not produce higher than 1350°F catalyst exit temperature.
- \* Pressure drop across catalyst will not change by more than 2"w.c. before cleaning. Such periodic cleaning of particulates is a normal service procedure and not a warranty issue.
- \* Engine operation will be stable and reproducible.
- \* Maximum lubrication oil consumption rate will be less than 0.0015 lb/BHP-H:
- \* Lube oil sulfated ash content will not exceed 0.5%.

Powerhouse ® #

- \* Lube oil phosphorus will not exceed 10 ppm and zinc will not exceed 5 ppm in the exhaust stream.
- \* Customer will maintain a high temperature alarm/shutdown in the catalyst outlet set at a maximum of 1350°F.
- \* Fuel will not contain known catalyst deactivators such as lead, mercury, arsenic, antimony, zin copper, tin, iron, barium, nickel, chrome, and/or phosphorous.
- \* Chlorinated and Silicon containing compounds will not exceed 1 ppm in the exhaust stream.
- \* Sulfur compounds in the exhaust stream will not exceed 25 ppm.
- \* User must maintain and operate the engine in accordance with manufacturers' recommendations.

SPECIAL CONDITIONS: Air Fuel Ratio Controller Is NOT Required.

Special Reverse Flow Design - OXMR - for low exhaust temps.

672 COMBO

Should the converter not perform as stated above and the equipment has been maintained per the above terms and conditions and the application is as listed below, WPI is obligated to eith repair or replace any part(s) or whole of the converter so that it will perform as stated. The term of original warranty is not extended by any such action. UNDER NO CIRCUMSTANCES WILL WPI ASSUME ANY CONTINGENT LIABILITIES.

Customer / Location: Hanover New Mexico

Engine Model: Waukesha L 7042 GL Max HP: 1,478 RPM: 1,200

Dated: 03/17/04
Warranty Term: One (1) Year of Service

Calc S.V.= 62,896 hr-1



BY:

#### WAUKESHA-PEARCE INDUSTRIES, INC. - HOUSTON, TEXAS

Houston, Texas (phone) 713-723-1050

#### OUOTE / PERFORMANCE WORKSHEET

REQUIRED EMISSIONS: EQUIPMENT LOCATION:	Unspeci New Mex			
ADDITIONAL COMMENTS: DATE:	Low Nox 03/17/0	Settings 4		
S	ITE CONDIT	IONS		
Engine Make / Model	Waukesh	a L 7042 GL		
Engine Horsepower		1,478	Maximum	
Engine RPM		1,200	Maximum	
Fuel Type		CONG	2	red
Engine Exhaust Temperature	8	709	°F (±50°F)	
Engine Exhaust Flow		8,165	acfm	
Converter Flange Size	Specity	on Order	inches	
Oxygen in Engine Exhaust	The real particular and the second se	9.80	Percent	Maria II day as a maria
Engine Emissions			rers or Site Data	
NOx		0.90	g/BHP-Hr	
co		2.75	g/BHP-Hr	
NMHC		1.00	g/BHP-Hr	
CH20		0.290	g/BHP-Hr	
			HANNE STATE OF THE	Total
Post Converter Reduction	as %	Equals	Approximately	
NOx	0.0	0.90	g/BHP-Hr	
СО	93.0	0.19	g/BHP-Hr	
NMHC	79.0	0.21	g/BHP-Hr	
CH2O	93.0	0.020	g/BHP-Hr	
				Total
NOTE: All HC	reductions a	re temperature	dependent.	
NOTE: Conversion r	ates are sub	ject to ±3% pe	rformance factor.	

QUOTED EQUIPMENT Model / Data Net per System Description WPI Powerhouse ® COMBO 672 \$17,333 ADDITIONAL ITEMS: Thermocouples >4 - CC / AFR Power Supply or DC Required Thermocouple Wire (As Req) Safety Shutdown - (AFR) O2 Sensor Adaptor (>2) Crankcase Extractor System WED Code 1100 Series Required TOTAL NUMBER OF UNITS: TOTAL COST: \$17,333 \*\*\*\*\* SUBJECT TO THE ATTACHED PERFORMANCE / LIMITED WARRANTY STATEMENT \*\*\*\*\* Special Notes - Assumed Good Fuel / Manufacturer Published Engine Emissions Prox Backpressure "w.c. 6 Calculated S.V. = 62,896 hr-1 NMHC PPMv =~ Converter NOx PPMv =-129 CO PPMv =~ 84

REF:



295 Chipeta Way P.O. Box 58900 Salt Lake City, UT 84108 801/584-6999

February 26, 1999

Andrew Nowak, Ph.D., P.E. New Mexico Environment Department Air Quality Bureau 2048 Galisteo Street Santa Fe, New Mexico 87505

Subject:

32-7 CDP - PSD Application -1032-M-3

Dear Mr. Nowak:

This letter addresses the issues raised in your incompleteness letter dated February 18, 1999 with regards to the 32-7 Prevention of Significant Deterioration (PSD) permit application PSD-NM-1032-M-3. The following are responses to issues raised in your letter.

The New Mexico Environment Department, Air Quality Bureau (AQB) has requested that a BACT analysis be performed for carbon monoxide (CO) emissions from the proposed Waukesha engines. In a letter dated February 12, 1999, the AQB requested that WFS evaluate CO catalytic converters as BACT for control of CO emissions from the proposed engines. In response to this issue, WFS proposes to install converters on two of the four proposed new engines at the 32-7 CDP.

Using a CO reduction of 90 percent for two of the four proposed engines, the total increase in CO emissions would be reduced from approximately 141.2 tons per year to 78.7 tons per year. Thus, the increase in CO emissions from the proposed modification would be less than the significant emission rate for CO of 100 tons per year. As such, the proposed modification would not be subject to BACT review for CO, and a BACT determination for CO emissions would not be required.

In regard to notification of adjacent landowners of the proposed modification to the 32-7 CDP, the letter to Robert Witten and Frederic Nathan, Trustees, was sent to an incorrect address. This problem was corrected and a copy of the letter has been sent to the appropriate address. A copy of the corrected letter has previously been provided to the AQB.

At the request of the AQB, a simplified flow diagram of the operations at the 32-7 CDP is provided with this letter.

I assume that the information provided in this letter should enable you to complete your review. If any additional information is needed, or you have questions, please feel free to contact me at (801) 584-6999 or Walter Konkel at (805) 963-6777.

Sincerely.

H. Lee Bauerle

Senior Environmental Specialist

attachment

Table 3.2-2. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE LEAN-BURN ENGINES<sup>a</sup> (SCC 2-02-002-54)

Pollutant	Emission Factor (lb/MMBtu) <sup>b</sup> (fuel input)	Emission Factor Rating
Criteria Pollutants and Greenhouse	e Gases	
NO <sub>x</sub> <sup>c</sup> 90 - 105% Load	4.08 E+00	В
NO <sub>x</sub> <sup>c</sup> <90% Load	8.47 E-01	В
CO <sup>c</sup> 90 - 105% Load	3.17 E-01	C
CO <sup>c</sup> <90% Load	5.57 E-01	В
$CO_2^d$	1.10 E+02	A
SO <sub>2</sub> <sup>e</sup>	5.88 E-04	A
$TOC^{f}$	1.47 E+00	A
Methane <sup>g</sup>	1.25 E+00	С
VOCh	1.18 E-01	С
PM10 (filterable) <sup>i</sup>	7.71 E-05	D
PM2.5 (filterable) <sup>i</sup>	7.71 E-05	D
PM Condensable <sup>j</sup>	9.91 E-03	D
Trace Organic Compounds		
1,1,2,2-Tetrachloroethane <sup>k</sup>	<4.00 E-05	Е
1,1,2-Trichloroethane <sup>k</sup>	<3.18 E-05	Е
1,1-Dichloroethane	<2.36 E-05	Е
1,2,3-Trimethylbenzene	2.30 E-05	D
1,2,4-Trimethylbenzene	1.43 E-05	C
1,2-Dichloroethane	<2.36 E-05	E
1,2-Dichloropropane	<2.69 E-05	E
1,3,5-Trimethylbenzene	3.38 E-05	D
1,3-Butadiene <sup>k</sup>	2.67E-04	D
1,3-Dichloropropene <sup>k</sup>	<2.64 E-05	E
2-Methylnaphthalene <sup>k</sup>	3.32 E-05	С
2,2,4-Trimethylpentane <sup>k</sup>	2.50 E-04	С
Acenaphthenek	1.25 E-06	С

Table 3.2-2. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE LEAN-BURN ENGINES (Continued)

Pollutant	Emission Factor (lb/MMBtu) <sup>b</sup> (fuel input)	Emission Factor Rating
Acenaphthylenek	5.53 E-06	С
Acetaldehyde <sup>k,l</sup>	8.36 E-03	A
Acrolein <sup>k,l</sup>	5.14 E-03	A
Benzene <sup>k</sup>	4.40 E-04	A
Benzo(b)fluoranthene <sup>k</sup>	1.66 E-07	D
Benzo(e)pyrene <sup>k</sup>	4.15 E-07	D
Benzo(g,h,i)perylene <sup>k</sup>	4.14 E-07	D
Biphenyl <sup>k</sup>	2.12 E-04	D
Butane	5.41 E-04	D
Butyr/Isobutyraldehyde	1.01 E-04	С
Carbon Tetrachloride <sup>k</sup>	<3.67 E-05	Е
Chlorobenzene <sup>k</sup>	<3.04 E-05	Е
Chloroethane	1.87 E-06	D
Chloroform <sup>k</sup>	<2.85 E-05	Е
Chrysene <sup>k</sup>	6.93 E-07	С
Cyclopentane	2.27 E-04	С
Ethane	1.05 E-01	С
Ethylbenzene <sup>k</sup>	3.97 E-05	В
Ethylene Dibromide <sup>k</sup>	<4.43 E-05	Е
Fluoranthenek	1.11 E-06	С
Fluorene <sup>k</sup>	5.67 E-06	С
Formaldehyde <sup>k,l</sup>	5.28 E-02	A
Methanol <sup>k</sup>	2.50 E-03	В
Methylcyclohexane	1.23 E-03	С
Methylene Chloride <sup>k</sup>	2.00 E-05	С
n-Hexane <sup>k</sup>	1.11 E-03	С
n-Nonane	1.10 E-04	С

Table 3.2-2. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE LEAN-BURN ENGINES

(Continued)

Pollutant	Emission Factor (lb/MMBtu) <sup>b</sup> (fuel input)	Emission Factor Rating
n-Octane	3.51 E-04	С
n-Pentane	2.60 E-03	С
Naphthalene <sup>k</sup>	7.44 E-05	С
PAH <sup>k</sup>	2.69 E-05	D
Phenanthrene <sup>k</sup>	1.04 E-05	D
Phenol <sup>k</sup>	2.40 E-05	D
Propane	4.19 E-02	C
Pyrene <sup>k</sup>	1.36 E-06	С
Styrene <sup>k</sup>	<2.36 E-05	E
Tetrachloroethane <sup>k</sup>	2.48 E-06	D
Toluene <sup>k</sup>	4.08 E-04	В
Vinyl Chloride <sup>k</sup>	1.49 E-05	С
Xylene <sup>k</sup>	1.84 E-04	В

Reference 7. Factors represent uncontrolled levels. For  $NO_x$ , CO, and PM10, "uncontrolled" means no combustion or add-on controls; however, the factor may include turbocharged units. For all other pollutants, "uncontrolled" means no oxidation control; the data set may include units with control techniques used for NOx control, such as PCC and SCR for lean burn engines, and PSC for rich burn engines. Factors are based on large population of engines. Factors are for engines at all loads, except as indicated. SCC = Source Classification Code. TOC = Total Organic Compounds. PM-10 = Particulate Matter  $\leq 10$  microns ( $\mu$ m) aerodynamic diameter. A "<" sign in front of a factor means that the corresponding emission factor is based on one-half of the method detection limit. Emission factors were calculated in units of (lb/MMBtu) based on procedures in EPA Method 19. To convert from (lb/MMBtu) to (lb/10<sup>6</sup> scf), multiply by the heat content of the fuel. If the heat content is not available, use 1020 Btu/scf. To convert from (lb/MMBtu) to (lb/hp-hr) use the following equation:

lb/hp-hr = (lb/MMBtu) (heat input, MMBtu/hr) (1/operating HP, 1/hp)

Emission tests with unreported load conditions were not included in the data set. Based on 99.5% conversion of the fuel carbon to  $CO_2$ .  $CO_2$  [lb/MMBtu] = (3.67)(%CON)(C)(D)(1/h), where %CON = percent conversion of fuel carbon to  $CO_2$ , C = carbon content of fuel by weight (0.75), D = density of fuel, 4.1 E+04 lb/10<sup>6</sup> scf, and

h = heating value of natural gas (assume 1020 Btu/scf at 60°F).

- <sup>e</sup> Based on 100% conversion of fuel sulfur to SO<sub>2</sub>. Assumes sulfur content in natural gas of  $2,000 \text{ gr/}10^6 \text{scf.}$
- Emission factor for TOC is based on measured emission levels from 22 source tests.
- g Emission factor for methane is determined by subtracting the VOC and ethane emission factors from the TOC emission factor. Measured emission factor for methane compares well with the calculated emission factor, 1.31 lb/MMBtu vs. 1.25 lb/MMBtu, respectively.

h VOC emission factor is based on the sum of the emission factors for all speciated organic compounds less ethane and methane.

- Considered  $\leq 1 \mu m$  in aerodynamic diameter. Therefore, for filterable PM emissions, PM10(filterable) = PM2.5(filterable).
- <sup>j</sup> PM Condensable = PM Condensable Inorganic + PM-Condensable Organic
- Hazardous Air Pollutant as defined by Section 112(b) of the Clean Air Act.
- For lean burn engines, aldehyde emissions quantification using CARB 430 may reflect interference with the sampling compounds due to the nitrogen concentration in the stack. The presented emission factor is based on FTIR measurements. Emissions data based on CARB 430 are available in the background report.

TABLE 1.4-2. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM NATURAL GAS COMBUSTION<sup>a</sup>

Pollutant	Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Rating
CO <sub>2</sub> <sup>b</sup>	120,000	A
Lead	0.0005	D
N <sub>2</sub> O (Uncontrolled)	2.2	E
N <sub>2</sub> O (Controlled-low-NO <sub>X</sub> burner)	0.64	Е
PM (Total) <sup>c</sup>	7.6	D
PM (Condensable) <sup>c</sup>	5.7	D
PM (Filterable) <sup>c</sup>	1.9	В
$SO_2^{-d}$	0.6	A
TOC	11	В
Methane	2.3	В
VOC	5.5	С

are for all natural gas combustion sources. To convert from lb/10<sup>6</sup> scf to kg/10<sup>6</sup> m³, multiply by 16. To convert from lb/10<sup>6</sup> scf to 1b/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds. VOC = Volatile Organic Compounds.

<sup>&</sup>lt;sup>b</sup> Based on approximately 100% conversion of fuel carbon to  $CO_2$ .  $CO_2[lb/10^6 \text{ scf}] = (3.67)$  (CON) (C)(D), where CON = fractional conversion of fuel carbon to  $CO_2$ , C = carbon content of fuel by weight (0.76), and D = density of fuel,  $4.2 \times 10^4 \text{ lb}/10^6 \text{ scf}$ .

<sup>&</sup>lt;sup>c</sup> All PM (total, condensible, and filterable) is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors presented here may be used to estimate PM<sub>10</sub>, PM<sub>2.5</sub> or PM<sub>1</sub> emissions. Total PM is the sum of the filterable PM and condensible PM. Condensible PM is the particulate matter collected using EPA Method 202 (or equivalent). Filterable PM is the particulate matter collected on, or prior to, the filter of an EPA Method 5 (or equivalent) sampling train.

d Based on 100% conversion of fuel sulfur to SO<sub>2</sub>.

Assumes sulfur content is natural gas of 2,000 grains/10<sup>6</sup> scf. The SO<sub>2</sub> emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO<sub>2</sub> emission factor by the ratio of the site-specific sulfur content (grains/10<sup>6</sup> scf) to 2,000 grains/10<sup>6</sup> scf.



2030 Afton Place Farmington, NM 87401 (505) 325-6622

Analysis No: WF180090 Cust No: 85000-13420

**INLET TO DEHY** 

945 PSIG

93 DEG. F

78 DEG. F

06/19/2018

6 MCF/D

# Well/Lease Information

Source:

Pressure:

Well Flowing:

Sample Date:

Customer Name: WILLIAMS Well Name: 32-7 #1 CDP

County/State: SAN JUAN NM

Location: Field: Formation:

Flow Temp: Ambient Temp: Flow Rate: Cust. Stn. No.: Sample Method:

Sample Time: 9.00 AM

Sampled By: JOE WHEELER Sampled by (CO): WILLIAMS Heat Trace:

Remarks: CALCULATED MOLECULAR WEIGHT = 17.9409

**Analysis** 

Component:	Mole%:	Unormalized %:	**GPM:	*BTU:	*SP Gravity:
Nitrogen	0.0897	0.0882	0.0100	0.00	0.0009
CO2	6.5048	6.3983	1.1120	0.00	0.0988
Methane	92.9634	91.4416	15.7910	938.93	0.5149
Ethane	0.4137	0.4069	0.1110	7.32	0.0043
Propane	0.0159	0.0156	0.0040	0.40	0.0002
Iso-Butane	0.0041	0.0040	0.0010	0.13	0.0001
N-Butane	0.0022	0.0022	0.0010	0.07	0.0000
Neopentane 2,2 dmc3	0.0054	0.0053	0.0020	0.22	0.0001
I-Pentane	0.0000	0.0000	0.0000	0.00	0.0000
N-Pentane	0.0009	0.0009	0.0000	0.04	0.0000
Neohexane	0.0000	N/R	0.0000	0.00	0.0000
2-3-Dimethylbutane	0.0000	N/R	0.0000	0.00	0.0000
Cyclopentane	0.0000	N/R	0.0000	0.00	0.0000
2-Methylpentane	0.0000	N/R	0.0000	0.00	0.0000
3-Methylpentane	0.0000	N/R	0.0000	0.00	0.0000
C6	0.0000	0.0000	0.0000	0.00	0.0000
Methylcyclopentane	0.0000	N/R	0.0000	0.00	0.0000
Benzene	0.0000	N/R	0.0000	0.00	0.0000
Cyclohexane	0.0000	N/R	0.0000	0.00	0.0000
2-Methylhexane	0.0000	N/R	0.0000	0.00	0.0000
3-Methylhexane	0.0000	N/R	0.0000	0.00	0.0000
2-2-4-Trimethylpentane	0.0000	N/R	0.0000	0.00	0.0000
i-heptanes	0.0000	N/R	0.0000	0.00	0.0000
Heptane	0.0000	N/R	0.0000	0.00	0.0000

Total	100.00	98.363	17.032	947.11	0.6195
C12P	0.0000	N/R	0.0000	0.00	0.0000
C11	0.0000	N/R	0.0000	0.00	0.0000
i-C11	0.0000	N/R	0.0000	0.00	0.0000
C10	0.0000	N/R	0.0000	0.00	0.0000
i-C10	0.0000	N/R	0.0000	0.00	0.0000
C9	0.0000	N/R	0.0000	0.00	0.0000
i-C9	0.0000	N/R	0.0000	0.00	0.0000
o Xylene (& 2,2,4 tmc7)	0.0000	N/R	0.0000	0.00	0.0000
m, p Xylene	0.0000	N/R	0.0000	0.00	0.0000
Ethylbenzene	0.0000	N/R	0.0000	0.00	0.0000
Octane	0.0000	N/R	0.0000	0.00	0.0000
i-Octanes	0.0000	N/R	0.0000	0.00	0.0000
4-Methylheptane	0.0000	N/R	0.0000	0.00	0.0000
2-Methylheptane	0.0000	N/R	0.0000	0.00	0.0000
Toluene	0.0000	N/R	0.0000	0.00	0.0000
Methylcyclohexane	0.0000	N/R	0.0000	0.00	0.0000

<sup>\* @ 14.730</sup> PSIA DRY & UNCORRECTED FOR COMPRESSIBILITY

<sup>\*\*@ 14.730</sup> PSIA & 60 DEG. F.

COMPRESSIBLITY FACTOR (1	/Z): 1.0022	CYLINDER #:	12
BTU/CU.FT IDEAL:	949.3	CYLINDER PRESSURE:	990 PSIG
BTU/CU.FT (DRY) CORRECTED FOR (	1/Z): 951.4	ANALYSIS DATE:	06/22/2018
BTU/CU.FT (WET) CORRECTED FOR (	(1/Z): 934.8	ANALYIS TIME:	08:25:53 AM
DRY BTU @ 15.025:	970.5	ANALYSIS RUN BY:	CAMERON MANGAN
REAL SPECIFIC GRAVITY:	0.6206		

GPM, BTU, and SPG calculations as shown above are based on current GPA constants.

GPA Standard: GPA 2286-14

GC: SRI Instruments 8610 Last Cal/Verify: 06/22/2018

GC Method: C12+BTEX Gas



## **WILLIAMS**

#### WELL ANALYSIS COMPARISON

Lease: 32-7 #1 CDP **INLET TO DEHY** 06/22/2018 Stn. No.: 85000-13420

Mtr. No.:

Smpl Date: 06/19/2018 06/22/2018 Test Date: WF180090

Run No: 0.0897 Nitrogen: 6.5048 CO2: 92.9634 Methane: 0.4137 Ethane: 0.0159 Propane: 0.0041 I-Butane: 0.0022 N-Butane: 0.0054 2,2 dmc3: 0.0000 I-Pentane: 0.0009 N-Pentane: 0.0000 Neohexane: 0.0000 2-3-Cyclopentane: 0.0000 2-Methylpentane: 0.0000 3-Methylpentane: 0.0000 C6: 0.0000 Methylcyclopentane: 0.0000 Benzene: 0.0000 Cyclohexane: 0.0000 2-Methylhexane: 0.0000 3-Methylhexane: 0.0000 2-2-4-0.0000 i-heptanes: 0.0000 Heptane: 0.0000 Methylcyclohexane: 0.0000 Toluene: 0.0000 2-Methylheptane: 0.0000 4-Methylheptane: 0.0000 i-Octanes: 0.0000 Octane: 0.0000 Ethylbenzene: 0.0000 m, p Xylene: 0.0000 o Xylene (& 2,2,4 0.0000 i-C9: 0.0000

C9: 0.0000 i-C10: 0.0000 C10: 0.0000 i-C11: 0.0000 C11: 0.0000 C12P: 0.0000 BTU: 951.4 GPM: 17.0300 SPG: 0.6206

Description: 32-7 #1 CDP Company: WILLIAMS

Field: WorkOrder:

Meter Number: GPA Method: GPA 2286

Analysis Date/Time: 6/22/2018 8:25:53 Sampled By: JOE WHEELER

Date Sampled: 6/19/2018 Analyst Initials: CM

Sample Temperature: 93 Instrument: SRI 8610

Sample Pressure: 990

# **GRI GlyCalc Information**

Component	Mol%	Normalized Weight %
Carbon Dioxide	6.5048	15.9567
Hydrogen Sulfide	N/R	0
Nitrogen	0.0897	0.1401
Methane	92.9634	83.1293
Ethane	0.4137	0.6934
Propane	0.0159	0.0391
Iso-Butane	0.0041	0.0133
n-Butane	0.0076	0.0246
Iso-Pentane	0	0
n-Pentane	0.0009	0.0036
Cyclopentane	0	0
n-Hexane	0	0
Cyclohexane	0	0
Other Hexanes	0	0
Heptanes	0	0
Methylcyclohexane	0	0
2 2 4 Trimethylpentane	0	0
Benzene	0	0
Toluene	0	0
Ethylbenzene	0	0
Xylenes	0	0
C8+ Heavies	0	0
Subtotal	100.0001	
Oxygen	N/R	
Subtotal	100.0001	100

Calculated Molecular Weight 17.9409

CAS	030 Afton Place, Farmington, NM 87401 **10 PSIG Pr	
ANALYSIS	C6+ C9+ C12+ C	
SERVICE	Other	Date6~_19~_1%
Sampled By:(Co.)	VILLIAMS	Time 9906 PM
Sampled by:(Person)	JOE WHIELEK	Well Flowing:
Company: W/L	uiams	Heat Trace:
Well Name: N/A		Flow Pressure (PSIG): 945
Location: 32-7	#/ CDP	Flow Temp (°F): 93°F
County/State: 5AN	SUAN NM	Ambient Temp (°F): 78°
Formation:	VA	Flow Rate (MCF/D):
Source: Meter Run	Tubing Casing Bradenhead Other	INLET TO DEITY
	omposite Sample Method: Purge & Fill	
Meter Number:		Cylinder Number:
Contact: MONIC	ASANDMOL	85000-13155
Remarks: EXTEN	DED SAMPLE	WF180090





#### PUMPS AVAILABLE:

	"PV" SERIES GLYCOL PUMPS					
Catalog Number	Model Number		acity / Hr.	Wor Pres	king sure	
TVallibel	T G T G T T G T G T T G	Min.	Max.**	Min.	Max.	
GAA	315 PV	3	13	100	1500	
GAD	1715 PV	8	40	300	1500	
GAB	4015 PV	12	40	300	1500	
GAF	9015 PV	27	90	300	1500	
GAH	21015 PV	66	210	400	1500	
GAJ	45015 PV	166	450	400	1500	

<sup>\*\*</sup>Maximum output is affected by system pressure drops. See system operation parameter for maximum output curves.

	"SC" SERIES GLYCOL PUMPS					
Catalog Number	Model Number		oacity . / Hr.		king sure	
Number	Number	Min.	Max.**	Min.	Max.	
GAC	2015 SC*	8	20	100	500	
GAG	5015 SC*	12	50	100	500	
GAI	10015 SC*	22	100	100	500	
GAK	20015 SC*	60	200	100	500	

NOTE: To order a Pump with Viton O Rings add 1 to Catalog number. Example: To order GAA with Viton O Rings, specify: GAA1.

#### MAXIMUM DESIGN PRESSURE FOR P.V. AND S.C. MODELS IS 1500 psig

#### **APPLICATIONS:**

Circulating pump for gas glycol dehydrators Circulating pump for gas amine desulphurizers

#### **FEATURES:**

Eliminates absorber liquid level controls No auxiliary power supply required Low gas consumption Completely sealed system prevents loss glycol No springs or toggles, only two moving assemblies Hydraulic "cushioned" check valves with removable seats of hardened stainless steel

#### **OPERATION:**

Materials for the vital working parts have been selected for greatest wear resistance. These materials include stainless steel, hard chrome plating, satellite, nylon and teflon. Moving "O" Ring seals are compounded specifically for ethylene glycol service. A complete operational check is given each pump after assembly.

"O" Ring sealed check valve darts are standard in all except the model 315 PV. Teflon sealed darts are available. Capsule type ball checks are used in the 315 PV and are available for 1715 PV, 2015 SC and 4015 PV.

\*These pumps are designed for operating pressures between 100 and 500 psig maximum design pressure for all models is 1500 psig.

P. 1/1

Oil and Gas Induction Equipment

J. Erwerk, Inc. 4101 Ball Main Street Familington, NM 87401

\$05/476-1151 64XC \$05/325-0317

VIA FACSIMILE Fax No. (801) 584-7760 Pages: 1

August 19, 1994

Mr. Lee Bauerla Williams Field Services Salt Lake City, UT

The following table shows the stack emissions at maximum firing conditions for the dahydrators noted:

Dehydrator	NO <sub>x</sub>	ÇO ∌/₽ŧ¥	Fuel SCEH	Total Stack Class. ACFH	Stuck Hi. Fi	Stack Dia Inches	Stack Temp P	. Steck Velocity, FFS
J2P10M11109	0.16	0_17	357	10010	12'-8"	*	600	5,1
J2F10M749	1.03	0.21	429	12012	19"-1"	10	600	6.1
J2P12M11109	0.16	0.17	357	10010	132.	*	600	<b>5.</b> i
J2P12M749	1.03	0.21	429	12012	19"-1"	10	600	6.1
J2P20M11109	1.03	0.21	429	12012	131.	10	600	6.1

Please call me if you need additional information.

Sincerely,

Frosty Heath

FH/ab

5928 U.S. Highway 64 Farmington, NM 87401



Office: (505)632-2200 Fax: (505)632-8070

July 22, 1998

Mr. Bobby Myers
Williams Field Services
Environmental Affairs
295 Chipeta Way
P O Box 58900
Salt Lake City, UT 84158-0900

The table shown below gives the stack emissions for our larger dehydrators:

Unit Description	SO   Ib/day	NO <sub>x</sub>	CO Jb/ Day	Fuel SCFH	Total Organic Comp. Lb/d	Stack Ht.	Stack Dia inches	Stack Temp °F	Stack   Velocity
Description	i sorday	I Day	10000		- Comp. 22-0		1	1 100 1	1
10 MM LP	10.1	.27	.43	659	.13	1 10.	8	600	5.1
10 MM HP	.01	.27	.43	659	.13 1	1 10.	1 10	600	6.1
12 MM LP	.02	.49	.78	1208	.23	10'	8 1	600	5.1
12 MM HP	.02	.49	.78	1208	.23	10'	10	600	6.1
15 MM	.02	_54	.85	1318	.25	10.	8	600 !	5.1
20 MM LP	.02	.67	1.07	1648	.31	10, 1	8	600	5.1
20 MM HP	.02	.67	1.07	1648	.31	10, 1	12	600 ;	6.1

If you need any additional information please call me.

Sincerely,

Darby West

VP Engineering

# 1995 Protocol for Equipment Leak Emission Estimates

Emission Standards Division

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Air and Radiation
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

November 1995

TABLE 2-4. OIL AND GAS PRODUCTION OPERATIONS AVERAGE EMISSION FACTORS (kg/hr/source)

Equipment Type	Service <sup>a</sup>	Emission Factor (kg/hr/source) <sup>b</sup>
Valves	Gas Heavy Oil Light Oil Water/Oil	4.5E-03 8.4E-06 2.5E-03 9.8E-05
Pump seals	Gas Heavy Oil Light Oil Water/Oil	2.4E-03 NA 1.3E-02 2.4E-05
Others <sup>C</sup>	Gas Heavy Oil Light Oil Water/Oil	8.8E-03 3.2E-05 7.5E-03 1.4E-02
Connectors	Gas Heavy Oil Light Oil Water/Oil	2.0E-04 7.5E-06 2.1E-04 1.1E-04
Flanges	Gas Heavy Oil Light Oil Water/Oil	3.9E-04 3.9E-07 1.1E-04 2.9E-06
Open-ended lines	Gas Heavy Oil Light Oil Water/Oil	2.0E-03 1.4E-04 1.4E-03 2.5E-04

aWater/Oil emission factors apply to water streams in oil service with a water content greater than 50%, from the point of origin to the point where the water content reaches 99%. For water streams with a water content greater than 99%, the emission rate is considered negligible.

bThese factors are for total organic compound emission rates (including non-VOC's such as methane and ethane) and apply to light crude, heavy crude, gas plant, gas production, and off shore facilities. "NA" indicates that not enough data were available to develop the indicated emission factor.

CThe "other" equipment type was derived from compressors, diaphrams, drains, dump arms, hatches, instruments, meters, pressure relief valves, polished rods, relief valves, and vents. This "other" equipment type should be applied for any equipment type other than connectors, flanges, open-ended lines, pumps, or valves.

loading operation, resulting in high levels of vapor generation and loss. If the turbulence is great enough, liquid droplets will be entrained in the vented vapors.

A second method of loading is submerged loading. Two types are the submerged fill pipe method and the bottom loading method. In the submerged fill pipe method, the fill pipe extends almost to the bottom of the cargo tank. In the bottom loading method, a permanent fill pipe is attached to the cargo tank bottom. During most of submerged loading by both methods, the fill pipe opening is below the liquid surface level. Liquid turbulence is controlled significantly during submerged loading, resulting in much lower vapor generation than encountered during splash loading.

The recent loading history of a cargo carrier is just as important a factor in loading losses as the method of loading. If the carrier has carried a nonvolatile liquid such as fuel oil, or has just been cleaned, it will contain vapor-free air. If it has just carried gasoline and has not been vented, the air in the carrier tank will contain volatile organic vapors, which will be expelled during the loading operation along with newly generated vapors.

Cargo carriers are sometimes designated to transport only one product, and in such cases are practicing "dedicated service". Dedicated gasoline cargo tanks return to a loading terminal containing air fully or partially saturated with vapor from the previous load. Cargo tanks may also be "switch loaded" with various products, so that a nonvolatile product being loaded may expel the vapors remaining from a previous load of a volatile product such as gasoline. These circumstances vary with the type of cargo tank and with the ownership of the carrier, the petroleum liquids being transported, geographic location, and season of the year.

One control measure for vapors displaced during liquid loading is called "vapor balance service", in which the cargo tank retrieves the vapors displaced during product unloading at bulk plants or service stations and transports the vapors back to the loading terminal. Figure 5.2-5 shows a tank truck in vapor balance service filling a service station underground tank and taking on displaced gasoline vapors for return to the terminal. A cargo tank returning to a bulk terminal in vapor balance service normally is saturated with organic vapors, and the presence of these vapors at the start of submerged loading of the tanker truck results in greater loading losses than encountered during nonvapor balance, or "normal", service. Vapor balance service is usually not practiced with marine vessels, although some vessels practice emission control by means of vapor transfer within their own cargo tanks during ballasting operations, discussed below.

Emissions from loading petroleum liquid can be estimated (with a probable error of  $\pm 30$  percent)<sup>4</sup> using the following expression:

$$L_{L} = 12.46 \frac{SPM}{T} \tag{1}$$

where:

 $L_T$  = loading loss, pounds per 1000 gallons (lb/10<sup>3</sup> gal) of liquid loaded

S = a saturation factor (see Table 5.2-1)

P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia) (see Figure 7.1-5, Figure 7.1-6, and Table 7.1-2)

M = molecular weight of vapors, pounds per pound-mole (lb/lb-mole) (see Table 7.1-2)

T = temperature of bulk liquid loaded,  ${}^{\circ}R$  ( ${}^{\circ}F$  + 460)

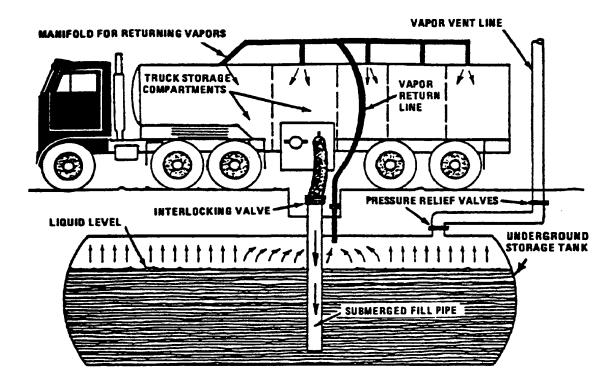


Figure 5.2-5. Tank truck unloading into a service station underground storage tank and practicing "vapor balance" form of emission control.

Table 5.2-1. SATURATION (S) FACTORS FOR CALCULATING PETROLEUM LIQUID LOADING LOSSES

Cargo Carrier	Mode Of Operation	S Factor
Tank trucks and rail tank cars	Submerged loading of a clean cargo tank	0.50
	Submerged loading: dedicated normal service	0.60
	Submerged loading: dedicated vapor balance service	1.00
	Splash loading of a clean cargo tank	1.45
	Splash loading: dedicated normal service	1.45
	Splash loading: dedicated vapor balance service	1.00
Marine vessels <sup>a</sup>	Submerged loading: ships	0.2
	Submerged loading: barges	0.5

<sup>&</sup>lt;sup>a</sup> For products other than gasoline and crude oil. For marine loading of gasoline, use factors from Table 5.2-2. For marine loading of crude oil, use Equations 2 and 3 and Table 5.2-3.

Table A-1 to Subpart A of Part 98—Global Warming Potentials

[100-Year Time Horizon]

Name	CAS No.	Chemical formula	Global warming potential (100 yr.)
Carbon dioxide	124–38–9	CO <sub>2</sub>	1
Methane	74–82–8	CH <sub>4</sub>	<sup>a</sup> 25
Nitrous oxide	10024-97-2	N <sub>2</sub> O	² 298
HFC-23	75–46–7	CHF <sub>3</sub>	<sup>a</sup> 14,800
HFC-32	75–10–5	CH <sub>2</sub> F <sub>2</sub>	² 675
HFC-41	593-53-3	CH <sub>3</sub> F	ª 92
HFC-125	354–33–6	C <sub>2</sub> HF <sub>5</sub>	³ 3,500
HFC-134	359–35–3	C <sub>2</sub> H <sub>2</sub> F <sub>4</sub>	³ 1,100
HFC-134a	811–97–2	CH <sub>2</sub> FCF <sub>3</sub>	<sup>a</sup> 1,430
HFC-143	430–66–0	C <sub>2</sub> H <sub>3</sub> F <sub>3</sub>	<sup>a</sup> 353
HFC-143a	420–46–2	C <sub>2</sub> H <sub>3</sub> F <sub>3</sub>	<sup>a</sup> 4,470
HFC-152	624–72–6	CH <sub>2</sub> FCH <sub>2</sub> F	53
HFC-152a	75–37–6	CH <sub>3</sub> CHF <sub>2</sub>	<sup>a</sup> 124
HFC-161	353–36–6	CH₃CH₂F	12
HFC-227ea	431–89–0	C <sub>3</sub> HF <sub>7</sub>	<sup>a</sup> 3,220
HFC-236cb	677–56–5	CH <sub>2</sub> FCF <sub>2</sub> CF <sub>3</sub>	1,340
HFC-236ea	431–63–0	CHF <sub>2</sub> CHFCF <sub>3</sub>	1,370
HFC-236fa	690–39–1	C <sub>3</sub> H <sub>2</sub> F <sub>6</sub>	<sup>a</sup> 9,810
HFC-245ca	679–86–7	C <sub>3</sub> H <sub>3</sub> F <sub>5</sub>	³ 693
HFC-245fa	460-73-1	CHF <sub>2</sub> CH <sub>2</sub> CF <sub>3</sub>	1,030
HFC-365mfc	406–58–6	CH <sub>3</sub> CF <sub>2</sub> CH <sub>2</sub> CF <sub>3</sub>	794
HFC-43-10mee	138495-42-8	CF <sub>3</sub> CFHCFHCF <sub>2</sub> CF <sub>3</sub>	<sup>a</sup> 1,640
Sulfur hexafluoride	2551–62–4	SF <sub>6</sub>	° 22,800
Trifluoromethyl sulphur pentafluoride	373-80-8	SF <sub>5</sub> CF <sub>3</sub>	17,700
Nitrogen trifluoride	7783–54–2	NF <sub>3</sub>	17,200
PFC-14 (Perfluoromethane)	75–73–0	CF <sub>4</sub>	7,390
PFC-116 (Perfluoroethane)	76–16–4	C <sub>2</sub> F <sub>6</sub>	ª 12,200
PFC-218 (Perfluoropropane)	76–19–7	C <sub>3</sub> F <sub>8</sub>	<sup>a</sup> 8,830

Name	CAS No.	Chemical formula	Global warming potential (100 yr.)
Perfluorocyclopropane	931–91–9	C-C <sub>3</sub> F <sub>6</sub>	17,340
PFC-3-1-10 (Perfluorobutane)	355–25–9	C <sub>4</sub> F <sub>10</sub>	<sup>a</sup> 8,860
Perfluorocyclobutane	115-25-3	C-C <sub>4</sub> F <sub>8</sub>	<sup>a</sup> 10,300
PFC-4-1-12 (Perfluoropentane)	678–26–2	C <sub>5</sub> F <sub>12</sub>	³ 9,160
PFC-5-1-14 (Perfluorohexane)	355–42–0	C <sub>6</sub> F <sub>14</sub>	ª 9,300
PFC-9-1-18	306–94–5	C <sub>10</sub> F <sub>18</sub>	7,500
HCFE-235da2 (Isoflurane)	26675–46–7	CHF <sub>2</sub> OCHCICF <sub>3</sub>	350
HFE-43-10pccc (H-Galden 1040x)	E1730133	CHF <sub>2</sub> OCF <sub>2</sub> OC <sub>2</sub> F <sub>4</sub> OCHF <sub>2</sub>	1,870
HFE-125	3822-68-2	CHF <sub>2</sub> OCF <sub>3</sub>	14,900
HFE-134	1691–17–4	CHF <sub>2</sub> OCHF <sub>2</sub>	6,320
HFE-143a	421–14–7	CH <sub>3</sub> OCF <sub>3</sub>	756
HFE–227ea	2356–62–9	CF <sub>3</sub> CHFOCF <sub>3</sub>	1,540
HFE-236ca12 (HG-10)	78522–47–1	CHF <sub>2</sub> OCF <sub>2</sub> OCHF <sub>2</sub>	2,800
HFE-236ea2 (Desflurane)	57041–67–5	CHF <sub>2</sub> OCHFCF <sub>3</sub>	989
HFE-236fa	20193-67-3	CF <sub>3</sub> CH <sub>2</sub> OCF <sub>3</sub>	487
HFE-245cb2	22410-44-2	CH <sub>3</sub> OCF <sub>2</sub> CF <sub>3</sub>	708
HFE-245fa1	84011–15–4	CHF <sub>2</sub> CH <sub>2</sub> OCF <sub>3</sub>	286
HFE-245fa2	1885–48–9	CHF <sub>2</sub> OCH <sub>2</sub> CF <sub>3</sub>	659
HFE-254cb2	425–88–7	CH <sub>3</sub> OCF <sub>2</sub> CHF <sub>2</sub>	359
HFE-263fb2	460–43–5	CF₃CH₂OCH₃	11
HFE-329mcc2	67490–36–2	CF <sub>3</sub> CF <sub>2</sub> OCF <sub>2</sub> CHF <sub>2</sub>	919
HFE-338mcf2	156053-88-2	CF <sub>3</sub> CF <sub>2</sub> OCH <sub>2</sub> CF <sub>3</sub>	552
HFE-338pcc13 (HG-01)	188690-78-0	CHF <sub>2</sub> OCF <sub>2</sub> CF <sub>2</sub> OCHF <sub>2</sub>	1,500
HFE-347mcc3	28523-86-6	CH <sub>3</sub> OCF <sub>2</sub> CF <sub>2</sub> CF <sub>3</sub>	575
HFE-347mcf2	E1730135	CF <sub>3</sub> CF <sub>2</sub> OCH <sub>2</sub> CHF <sub>2</sub>	374
HFE-347pcf2	406–78–0	CHF <sub>2</sub> CF <sub>2</sub> OCH <sub>2</sub> CF <sub>3</sub>	580
HFE-356mec3	382-34-3	CH₃OCF₂CHFCF₃	101
HFE-356pcc3	160620–20–2	CH <sub>3</sub> OCF <sub>2</sub> CF <sub>2</sub> CHF <sub>2</sub>	110
HFE-356pcf2	E1730137	CHF <sub>2</sub> CH <sub>2</sub> OCF <sub>2</sub> CHF <sub>2</sub>	265
HFE-356pcf3	35042-99-0	CHF <sub>2</sub> OCH <sub>2</sub> CF <sub>2</sub> CHF <sub>2</sub>	502

Name	CAS No.	Chemical formula	Global warming potential (100 yr.)
HFE-365mcf3	378–16–5	CF <sub>3</sub> CF <sub>2</sub> CH <sub>2</sub> OCH <sub>3</sub>	11
HFE-374pc2	512–51–6	CH <sub>3</sub> CH <sub>2</sub> OCF <sub>2</sub> CHF <sub>2</sub>	557
HFE-449sl (HFE-7100) Chemical blend	163702–07–6 163702–08–7	C <sub>4</sub> F <sub>9</sub> OCH <sub>3</sub> (CF <sub>3</sub> ) <sub>2</sub> CFCF <sub>2</sub> OCH <sub>3</sub>	297
HFE–569sf2 (HFE–7200) Chemical blend	163702-05-4 163702-06-5	$C_4F_9OC_2H_5$ $(CF_3)_2CFCF_2OC_2H_5$	59
Sevoflurane	28523-86-6	CH <sub>2</sub> FOCH(CF <sub>3</sub> ) <sub>2</sub>	345
HFE-356mm1	13171–18–1	(CF <sub>3</sub> ) <sub>2</sub> CHOCH <sub>3</sub>	27
HFE-338mmz1	26103-08-2	CHF <sub>2</sub> OCH(CF <sub>3</sub> ) <sub>2</sub>	380
(Octafluorotetramethy- lene)hydroxymethyl group	NA	X-(CF <sub>2</sub> ) <sub>4</sub> CH(OH)-X	73
HFE-347mmy1	22052-84-2	CH <sub>3</sub> OCF(CF <sub>3</sub> ) <sub>2</sub>	343
Bis(trifluoromethyl)-methanol	920–66–1	(CF₃)₂CHOH	195
2,2,3,3,3-pentafluoropropanol	422-05-9	CF <sub>3</sub> CF <sub>2</sub> CH <sub>2</sub> OH	42
PFPMIE	NA	CF <sub>3</sub> OCF(CF <sub>3</sub> )CF <sub>2</sub> OCF <sub>2</sub> O CF <sub>3</sub>	10,300

<sup>&</sup>lt;sup>a</sup> The GWP for this compound is different than the GWP in the version of Table A-1 to subpart A of part 98 published on October 30, 2009.

## Table C−1 to Subpart C of Part 98—Default CO₂ Emission Factors and High Heat Values for Various Types of Fuel

Table C–1 to Subpart C—Default CO<sub>2</sub> Emission Factors and High Heat Values for Various Types of Fuel

Fuel type	Default high heat value	Default CO <sub>2</sub> emission factor
Coal and coke	mmBtu/short ton	kg CO₂/mmBtu
Anthracite	25.09	103.69
Bituminous	24.93	93.28
Subbituminous	17.25	97.17
Lignite	14.21	97.72
Coal Coke	24.80	113.67
Mixed (Commercial sector)	21.39	94.27
Mixed (Industrial coking)	26.28	93.90
Mixed (Industrial sector)	22.35	94.67
Mixed (Electric Power sector)	19.73	95.52
Natural gas	mmBtu/scf	kg CO₂/mmBtu
(Weighted U.S. Average)	$1.026 \times 10^{-3}$	53.06
Petroleum products	mmBtu/gallon	kg CO₂/mmBtu
Distillate Fuel Oil No. 1	0.139	73.25
Distillate Fuel Oil No. 2	0.138	73.96
Distillate Fuel Oil No. 4	0.146	75.04
Residual Fuel Oil No. 5	0.140	72.93
Residual Fuel Oil No. 6	0.150	75.10
Used Oil	0.138	74.00
Kerosene	0.135	75.20
Liquefied petroleum gases (LPG) <sup>1</sup>	0.092	61.71
Propane <sup>1</sup>	0.091	62.87
Propylene <sup>2</sup>	0.091	67.77
Ethane <sup>1</sup>	0.068	59.60
Ethanol	0.084	68.44
Ethylene <sup>2</sup>	0.058	65.96
Isobutane <sup>1</sup>	0.099	64.94
Isobutylene <sup>1</sup>	0.103	68.86
Butane <sup>1</sup>	0.103	64.77
Butylene <sup>1</sup>	0.105	68.72
Naphtha (<401 deg F)	0.125	68.02
Natural Gasoline	0.110	66.83

Fuel type	Default high heat value	Default CO <sub>2</sub> emission factor
Other Oil (>401 deg F)	0.139	76.22
Pentanes Plus	0.110	70.02
Petrochemical Feedstocks	0.125	71.02
Petroleum Coke	0.143	102.41
Special Naphtha	0.125	72.34
Unfinished Oils	0.139	74.54
Heavy Gas Oils	0.148	74.92
Lubricants	0.144	74.27
Motor Gasoline	0.125	70.22
Aviation Gasoline	0.120	69.25
Kerosene-Type Jet Fuel	0.135	72.22
Asphalt and Road Oil	0.158	75.36
Crude Oil	0.138	74.54
Other fuels-solid	mmBtu/short ton	kg CO₂/mmBtu
Municipal Solid Waste	9.95 <sup>3</sup>	90.7
Tires	28.00	85.97
Plastics	38.00	75.00
Petroleum Coke	30.00	102.41
Other fuels—gaseous	mmBtu/scf	kg CO₂/mmBtu
Blast Furnace Gas	$0.092 \times 10^{-3}$	274.32
Coke Oven Gas	$0.599 \times 10^{-3}$	46.85
Propane Gas	$2.516 \times 10^{-3}$	61.46
Fuel Gas <sup>4</sup>	$1.388 \times 10^{-3}$	59.00
Biomass fuels—solid	mmBtu/short ton	kg CO₂/mmBtu
Wood and Wood Residuals (dry basis)5	17.48	93.80
Agricultural Byproducts	8.25	118.17
Peat	8.00	111.84
Solid Byproducts	10.39	105.51
Biomass fuels—gaseous	mmBtu/scf	kg CO₂/mmBtu
Landfill Gas	$0.485 \times 10^{-3}$	52.07
Other Biomass Gases	$0.655 \times 10^{-3}$	52.07
Biomass Fuels—Liquid	mmBtu/gallon	kg CO₂/mmBtu
Ethanol	0.084	68.44
Biodiesel (100%)	0.128	73.84
Rendered Animal Fat	0.125	71.06
Vegetable Oil	0.120	81.55

$$HHV_w = ((100 - M)/100)*HHV_d$$

where

 $HHV_{w}$  = wet basis HHV,  $M = moisture \ content \ (percent) \ and \\ HHV_{d} = dry \ basis \ HHV \ from \ Table \ C-1.$ 

[74 FR 56374, Oct. 30, 2009, as amended at 75 FR 79153, Dec. 17, 2010; 78 FR 71950, Nov. 29, 2013]

<sup>&</sup>lt;sup>1</sup> The HHV for components of LPG determined at 60 °F and saturation pressure with the exception of ethylene.

<sup>&</sup>lt;sup>2</sup> Ethylene HHV determined at 41 °F (5 °C) and saturation pressure.

<sup>&</sup>lt;sup>3</sup> Use of this default HHV is allowed only for: (a) Units that combust MSW, do not generate steam, and are allowed to use Tier 1; (b) units that derive no more than 10 percent of their annual heat input from MSW and/or tires; and (c) small batch incinerators that combust no more than 1,000 tons of MSW per year.

<sup>&</sup>lt;sup>4</sup> Reporters subject to subpart X of this part that are complying with § 98.243(d) or subpart Y of this part may only use the default HHV and the default CO2 emission factor for fuel gas combustion under the conditions prescribed in § 98.243(d)(2)(i) and (d)(2)(ii) and § 98.252(a)(1) and (a)(2), respectively.

Otherwise, reporters subject to subpart X or subpart Y shall use either Tier 3 (Equation C-5) or Tier 4.

<sup>&</sup>lt;sup>5</sup> Use the following formula to calculate a wet basis HHV for use in Equation C-1:

## Map(s)

<u>A map</u> such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

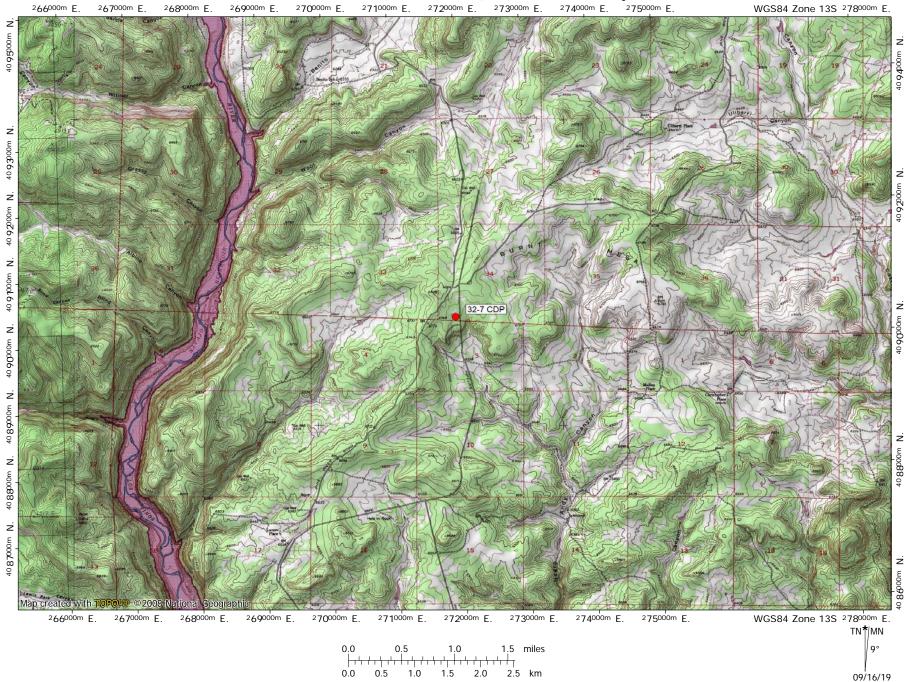
The UTM or Longitudinal coordinate system on both axes	An indicator showing which direction is north
A minimum radius around the plant of 0.8km (0.5 miles)	Access and haul roads
Topographic features of the area	Facility property boundaries
The name of the map	The area which will be restricted to public access
A graphical scale	

\_\_\_\_\_\_

Please see the following page(s).

Form-Section 8 last revised: 8/15/2011 Section 8, Page 1 Saved Date: 9/19/2019

HARVEST FOUR CORNERS, LLC - 32-7 CENTRAL DELIVERY POINT (CDP) - San Juan County, NM T 32 N, R 07 W, Section 34 E. 267000m E. 268000m E. 269000m E. 271000m E. 271000m E. 272000m E. 273000m E. 273000m E. 273000m E. 275000m E. 2750000m E. 275000m E. 2750000m E. 275000m E. 2750000m E. 275000000 E. 27500000 E. 27500000 E. 2750000 E. 2750000



## **Proof of Public Notice**

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC) (This proof is required by: 20.2.72.203.A.14 NMAC "Documentary Proof of applicant's public notice")

☑ I have read the AQB "Guidelines for Public Notification for Air Quality Permit Applications"
 This document provides detailed instructions about public notice requirements for various permitting actions.
 It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

 Unless otherwise allowed elsewhere in this document, the following items document proof of the applicant's Public Notification. Please include this page in your proof of public notice submittal with checkmarks indicating which documents are being submitted with the application.

 New Permit and Significant Permit Revision public notices must include all items in this list.
 Technical Revision public notices require only items 1, 5, 9, and 10.
 Per the Guidelines for Public Notification document mentioned above, include:

 A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)

1.	A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
2.	A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g. post office, library, grocery, etc.)
3.	A copy of the property tax record (20.2.72.203.B NMAC).
4.	A sample of the letters sent to the owners of record.
5.	A sample of the letters sent to counties, municipalities, and Indian tribes.
6.	A sample of the public notice posted and a verification of the local postings.
7.	A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
8.	A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
9.	A copy of the <u>classified or legal</u> ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
10.	A copy of the <u>display</u> ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
11.	A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.

Not applicable for this Title V Operating Permit renewal application submitted under 20.2.70 NMAC.

Form-Section 9 last revised: 8/15/2011 Section 9, Page 1 Saved Date: 9/19/2019

## Written Description of the Routine Operations of the Facility

A written description of the routine operations of the facility. Include a description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated. For modifications and/or revisions, explain how the changes will affect the existing process. In a separate paragraph describe the major process bottlenecks that limit production. The purpose of this description is to provide sufficient information about plant operations for the permit writer to determine appropriate emission sources.

The 32-7 CDP compresses and dehydrates pipeline quality natural gas. Natural gas is received from independent producers via gathering pipelines. The natural gas stream typically contains produced water, which is separated from the gas stream via an inlet separator. The resulting produced water is stored in above ground fixed roof storage tanks, where it is stored until offsite transport via tank truck.

The natural gas is compressed by for pipeline transmission using compressors driven by the natural gasfired reciprocating internal combustion engines. The natural gas stream is then routed to the triethylene glycol (TEG) dehydrators, which further dehydrate the gas stream. The TEG solution comes into contact with the natural gas and removes the water and some hydrocarbons. The rich TEG solution is regenerated by boiling off the water and hydrocarbons and reclaiming the glycol.

Storage tanks are used to store lube oil and used oil, TEG, produced water, waste water and antifreeze. Waste products are hauled off-site as required.

There are no process bottlenecks that limit production.

Other emission sources include: startups, shutdowns and routine maintenance (SSM) from the compressors and piping, and fugitive emissions from process piping (valves, flanges, seals, etc.).

The facility is authorized to operate continuously.

Form-Section 10 last revised: 8/15/2011 Section 10, Page 1 Saved Date: 9/19/2019

## **Source Determination**

Source submitting under 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC

Sources applying for a construction permit, PSD permit, or operating permit shall evaluate surrounding and/or associated sources (including those sources directly connected to this source for business reasons) and complete this section. Responses to the following questions shall be consistent with the Air Quality Bureau's permitting guidance, <u>Single Source Determination Guidance</u>, which may be found on the Applications Page in the Permitting Section of the Air Quality Bureau website.

Typically, buildings, structures, installations, or facilities that have the same SIC code, that are under common ownership or control, and that are contiguous or adjacent constitute a single stationary source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. Submission of your analysis of these factors in support of the responses below is optional, unless requested by NMED.

**A. Identify the emission sources evaluated in this section** (list and describe):

**32-7 Central Delivery Point (CDP)** 

B. Apply tl	he 3 cri	teria for deter	mining a sing	gle source	:			
<b>SIC</b>	Code:	Surrounding	or associated	l sources	belong	to the s	ame 2-digi	it industrial
group	ing (2-	digit SIC code	e) as this fac	ility, <u>OR</u>	surround	ing or a	ssociated s	sources that
belon	g to diff	erent 2-digit S	IC codes are s	support fac	cilities fo	r this sou	irce.	
			X Yes	$\sqcap N$	O			

<u>Common Ownership or Control</u>: Surrounding or associated sources are under common ownership or control as this source.

 $\overline{\mathbf{X}}$  Yes  $\square$  No

<u>Contiguous</u> <u>or Adjacent</u>: Surrounding or associated sources are contiguous or adjacent with this source.

X Yes □ No

#### C. Make a determination:

- The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "YES" boxes should be checked. If in "A" above you evaluated other sources as well, you must check AT LEAST ONE of the boxes "NO" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.
- ☐ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

## Section 12.A PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

<u>A PSD applicability determination for all sources</u>. For sources applying for a significant permit revision, apply the applicable requirements of 20.2.74.AG and 20.2.74.200 NMAC and to determine whether this facility is a major or minor PSD source, and whether this modification is a major or a minor PSD modification. It may be helpful to refer to the procedures for Determining the Net Emissions Change at a Source as specified by Table A-5 (Page A.45) of the <u>EPA New Source Review</u> Workshop Manual to determine if the revision is subject to PSD review.

Not applicable for applications submitted under 20.2.70 NMAC.

Form-Section 12 last revised: 5/29/2019 Section 12, Page 1 Saved Date: 9/19/2019

## **Determination of State & Federal Air Quality Regulations**

This section lists each state and federal air quality regulation that may apply to your facility and/or equipment that are stationary sources of regulated air pollutants.

Not all state and federal air quality regulations are included in this list. Go to the Code of Federal Regulations (CFR) or to the Air Quality Bureau's regulation page to see the full set of air quality regulations.

#### **Required Information for Specific Equipment:**

For regulations that apply to specific source types, in the 'Justification' column **provide any information needed to determine if the regulation does or does not apply**. **For example**, to determine if emissions standards at 40 CFR 60, Subpart IIII apply to your three identical stationary engines, we need to know the construction date as defined in that regulation; the manufacturer date; the date of reconstruction or modification, if any; if they are or are not fire pump engines; if they are or are not emergency engines as defined in that regulation; their site ratings; and the cylinder displacement.

#### Required Information for Regulations that Apply to the Entire Facility:

See instructions in the 'Justification' column for the information that is needed to determine if an 'Entire Facility' type of regulation applies (e.g. 20.2.70 or 20.2.73 NMAC).

#### Regulatory Citations for Regulations That Do Not, but Could Apply:

If there is a state or federal air quality regulation that does not apply, but you have a piece of equipment in a source category for which a regulation has been promulgated, you must **provide the low level regulatory citation showing why your piece of equipment is not subject to or exempt from the regulation. For example** if you have a stationary internal combustion engine that is not subject to 40 CFR 63, Subpart ZZZZ because it is an existing 2 stroke lean burn stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, your citation would be 40 CFR 63.6590(b)(3)(i). **We don't want a discussion of every non-applicable regulation, but if it is possible a regulation could apply, explain why it does not. For example,** if your facility is a power plant, you do not need to include a citation to show that 40 CFR 60, Subpart OOO does not apply to your non-existent rock crusher.

#### **Regulatory Citations for Emission Standards:**

For each unit that is subject to an emission standard in a source specific regulation, such as 40 CFR 60, Subpart OOO or 40 CFR 63, Subpart HH, include the low level regulatory citation of that emission standard. Emission standards can be numerical emission limits, work practice standards, or other requirements such as maintenance. Here are examples: a glycol dehydrator is subject to the general standards at 63.764C(1)(i) through (iii); an engine is subject to 63.6601, Tables 2a and 2b; a crusher is subject to 60.672(b), Table 3 and all transfer points are subject to 60.672(e)(1)

#### Federally Enforceable Conditions:

All federal regulations are federally enforceable. All Air Quality Bureau State regulations are federally enforceable except for the following: affirmative defense portions at 20.2.7.6.B, 20.2.7.110(B)(15), 20.2.7.11 through 20.2.7.113, 20.2.7.115, and 20.2.7.116; 20.2.37; 20.2.42; 20.2.43; 20.2.62; 20.2.63; 20.2.86; 20.2.89; and 20.2.90 NMAC. Federally enforceable means that EPA can enforce the regulation as well as the Air Quality Bureau and federally enforceable regulations can count toward determining a facility's potential to emit (PTE) for the Title V, PSD, and nonattainment permit regulations.

INCLUDE ANY OTHER INFORMATION NEEDED TO COMPLETE AN APPLICABILITY DETERMINATION OR THAT IS RELEVENT TO YOUR FACILITY'S NOTICE OF INTENT OR PERMIT.

EPA Applicability Determination Index for 40 CFR 60, 61, 63, etc: http://cfpub.epa.gov/adi/

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## Federal Regulations

Federal standards and requirements are embodied in Title 40 (Protection of the Environment), Subchapter C (Air Programs) of the CFR, Parts 50 through 99. The applicability of those parts of the CFR that are consistent with the limited list of standards and requirements defined as applicable requirements are identified in the following pages.

## FEDERAL REGULATIONS APPLICABILITY CHECKLIST

FEDERAL REGU- LATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 50	National Ambient Air Quality Standards (NAAQS)	Yes	Facility	The requirement to comply with the National Ambient Air Quality Standards applies to all sources operating within the State of New Mexico, including the station.
40 CFR 51	Requirements for Preparation, Adoption, and Submittal of Implementation Plans	No		The responsibility to prepare, adopt and submit for EPA approval Implementation Plans applies to local and state/tribal governmental agencies.  The facility is not a local, state or tribal governmental agency and therefore, the regulation does not apply.
40 CFR 52	Approval and Promulgation of Implementation Plans	No		40 CFR 52.21, Prevention of Significant Deterioration of Air Quality is not applicable to the facility, as it is a Prevention of Significant Deterioration (PSD) minor source.  The remainder of the subpart is also not applicable as it addresses approval of local, state and/or tribal agency Implementation Plans for administering the Prevention of Deterioration (PSD) program.
NSPS 40 CFR 60, Subpart A	General Provisions	Potentially applicable	1, 5, 8, 16, 18, 22 and 23; and new reciprocating compressors, pneumatic controllers, and the collection of fugitive emissions components	Applies if any other NSPS subpart applies. NSPS is not currently applicable to the equipment installed onsite.  The applicability of subpart JJJJ to RICE units 1, 5, 8, 16, 18, 22 and 23 will be evaluated upon their installation.  The applicability of subpart OOOOa will be evaluated to any new reciprocating compressors, pneumatic controllers, and the collection of fugitive emissions components installed at the facility.
NSPS 40 CFR60, Subpart Da	Performance Standards for Electric Utility Steam Generating Units	No		The subpart applies to each electric utility steam generating unit that is capable of combusting more than 73 megawatts (MW) (250 million British thermal units per hour (MMBtu/hr)) heat input of fossil fuel (either alone or in combination with any other fuel); and that commences construction, modification, or reconstruction after September 18, 1978.  The compressor station is not an affected facility as defined under the regulation; therefore, the subpart does not apply.
NSPS 40 CFR 60, Subpart Db	Standards of Performance for Industrial- Commercial- Institutional Steam Generating Units	No		The subpart applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour).  The compressor station is not an affected facility as defined in the regulation; therefore, the subpart does not apply.

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FEDERAL REGU- LATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
NSPS 40 CFR 60, Subpart Dc	Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units	No		The subpart applies to each steam generating unit that commences construction, modification, or reconstruction after June 9, 1989, and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).  The facility does not have any affected sources under the regulation; therefore, the subpart does not apply.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	No		The affected facility to which this subpart applies are storage tanks with capacity greater than 151,416 liters (40,000 gallons) that are used to store petroleum liquids for which construction is commenced after May 18, 1978.  The facility does not have equipment defined as an affected facility as defined in the regulation; therefore, the subpart does not apply.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	No		The affected facility to which this subpart applies is any storage vessel with a capacity greater than or equal to 75 cubic meters (m³) used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.  Except for the unit T-40 produced water storage tank, all of the storage tanks at the facility are below 75 m³ capacity. Therefore, the regulation does not apply to these tanks.  The unit T-40 produced water storage tank is a 500-barrel (21,000 gallon /79.5 m³) tank constructed in 2015. The produced water contains trace amounts of condensate. The tank stores produced water at the facility prior to custody transfer. Therefore, under § 60.110b(b) the subpart does not apply.
NSPS 40 CFR 60 Subpart GG	Standards of Performance for Stationary Gas Turbines	No		Affected facilities under the subpart are stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour and for which construction commenced after October 3, 1977  There are no turbines at the facility. Therefore, the subpart is not applicable.
NSPS 40 CFR 60, Subpart KKK	Standards of Performance for Leaks of VOC from Onshore Gas Plants	No		An affected facility under the subpart is an onshore gas plant that commences construction, reconstruction, or modification after January 20, 1984, and includes the group of all equipment (each pump, pressure relief device, openended valve or line, valve, compressor, and flange or other connector that is in VOC service or in wet gas service, and any device or system required by this subpart) except compressors (defined in § 60.631) within a process unit. A compressor station, dehydration unit, sweetening unit, underground storage tank, field gas gathering system, or liquefied natural gas unit is covered by this subpart if it is located at an onshore natural gas processing plant. If the unit is not located at the plant site, then it is exempt from the provisions of the subpart.  The facility is not an onshore gas plant and the subpart does not apply.
NSPS 40 CFR 60, Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO <sub>2</sub> Emissions	No		An affected facility is each sweetening unit, and each sweetening unit followed by a sulfur recovery unit, for which construction or modification commenced after January 20, 1984 at a natural gas processing plant.  The facility is not a natural gas processing plant and does not include any affected units as defined by the subpart; therefore the subpart does not apply.

FEDERAL REGU- LATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
NSPS 40 CFR 60,	Standards of Performance for Stationary Spark	Potentially applicable	1, 5, 8, 16, 18, 22 and 23	Under § 60.4230, the requirements of the subpart apply to spark-ignition (SI), reciprocating internal combustion engines (RICE) constructed, modified or reconstructed after June 12, 2006.
Subpart JJJJ	Ignition Internal Combustion Engines			Engine units 2, 3, 4, 5, 7, 13, 15, 19, 20 and 21 are existing RICE under the regulation, constructed prior to the regulatory applicability date. Therefore, the regulation is not applicable to these RICE. The engines have not undergone either "modification" or "reconstruction" under NSPS.
				Permitted units 1, 5, 8, 16, 18, 22 and 23 are not currently installed. It is anticipated the units 1, 5, 8, 16, 18, 22 and 23 will also be existing engines under the subpart. The applicability of the subpart to RICE units 1, 5, 8, 16, 18, 22 and 23 will be evaluated upon their installation.
NSPS 40 CFR 60,	Standards of Performance for Stationary	No		This subpart establishes emission standards and compliance schedules for the control of emissions from stationary combustion turbines that commenced construction, modification or reconstruction after February 18, 2005.
Subpart KKKK	Combustion Turbines			There are no stationary gas turbines at the facility. Therefore the subpart does not apply.
NSPS 40 CFR 60, Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015	No		Subpart OOOO establishes natural gas production, processing, transmission and distribution emission and equipment standards, including well completions; single continuous bleed, natural gas driven pneumatic controllers operating at bleed rates greater than 6 scfh and located between a wellhead and point of custody transfer; equipment leaks and sweetening units at natural gas processing plants; reciprocating compressors; centrifugal compressors; and storage vessels at well sites. The regulation includes provisions for initial and continuous compliance demonstrations, and recordkeeping and reporting requirements.  As it applies to the natural gas production segment, "affected sources" include the following sources constructed, modified or reconstructed after August 23, 2011:  - Each affected single natural gas well, as described in the regulation;  - Each reciprocating compressor, unless it is located at a well site or adjacent well site;  - Each single continuous bleed, natural gas driven pneumatic controller operating at a bleed rate of greater than 6 scfh and located between a wellhead and point of custody transfer;  - Each single storage vessel affected facility with VOC emissions of six (6) tpy or greater.  The equipment at the facility were constructed prior to the applicability date; therefore, the regulation is not applicable to the existing equipment. Should a new affected source under the regulation be installed at the facility at a future time, the applicability of the subpart to that source shall be evaluated. As applicable, Harvest will comply with the requirements of the regulation.
NSPS 40 CFR 60, Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	Potentially applicable	New reciprocating compressors, pneumatic controllers, and the collection of fugitive emissions components	Subpart OOOOa establishes emission standards and compliance schedules for the control of GHG methane emission limits as well as emission standards and compliance schedules for the control of VOC and SO2 emissions from crude oil and natural gas facilities that commence construction, modification, or reconstruction after September 18, 2015.  As it applies to equipment at a compressor station in the natural gas production segment, "affected sources" include the following emission sources constructed, modified or reconstructed after September 18, 2015 (§60.5365a):  - Each single reciprocating compressor (§60.5365a(c));  - Each pneumatic controller that is a single continuous bleed natural gasdriven pneumatic controller operating at a natural gas bleed rate greater than 6

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FEDERAL REGU- LATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
				scfh (§60.5365a(d)(1));
				- Each single storage vessel with the potential for VOC emissions equal to or greater than 6 tpy (§60.5365a(e)); and
				- The collection of fugitive emissions components at a compressor station, as defined in §60.5430a (§60.5365a(j)).
				The potential affected source equipment including the reciprocating compressors, pneumatic controllers, and collection of fugitive emissions components equipment at the facility, were each constructed prior to the applicability date or do not otherwise trigger the applicability of the regulation.
				The produced water storage tanks have emission rates of less than 6 tpy (the combined total is only 4.06 tpy); therefore, the regulation also does not apply to the produced water tanks.
				Should a new affected source be installed at the facility, the applicability of the subpart to that source shall be evaluated upon installation. As applicable, Harvest will comply with the applicable requirements in the subpart for any future devices installed.
NESHAP 40 CFR 61,	General Provisions	No		40 CFR 61National Emission Standards for Hazardous Air Pollutants (NESHAP) provides standards for equipment that emits hazardous air pollutants by specific source types.
Subpart A				Subpart A, General Provisions, applies if any other 40 CFR 61 NESHAP subpart applies. Subpart A is not applicable because there are no stationary sources at this facility for which a standard is prescribed under this part.
NESHAP 40 CFR 61, Subpart V	National Emission Standard for Equipment Leaks (Fugitive Emission Sources)	No		40 CFR 61, subpart V provides equipment standards, and monitoring, recordkeeping and reporting standards for specified equipment in VHAP service, including fugitive emissions from pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and required control devices or systems.
				Subpart V is not applicable because none of the potentially affected sources are in VHAP service.
MACT 40 CFR 63, Subpart A	General Provisions	Potentially applicable	1, 5, 8, 16, 22 and 23	Applies if any other 40 CFR 63 (NESHAP/MACT) subpart applies. There are no MACT standards applicable to the facility equipment as currently installed. The applicability of 40 CFR 63 (NESHAP/MACT) to RICE units 1, 5, 8, 16, 22 and 23 will be evaluated upon installation.
MACT	National Emission Standard for	No		The subpart includes standards for minimizing asbestos emissions from several operations, including demolition and renovation activities.
40 CFR 63, Subpart M	Asbestos			No existing or planned operation or activity at this facility triggers the applicability of this requirement. Therefore, the regulation does not apply.
MACT	National Emission Standards for	Yes	9a/b, 10a/b, 11a/b, 12a/b,	Under § 63.760, the subpart applies to owners and operators of affected sources located at oil and natural gas production facilities, including facilities
40 CFR 63, Subpart HH	Hazardous Air Pollutants From Oil and Natural Gas Production Facilities		24a/b and 25a/b	that are major and area sources of hazardous air pollutants (HAP).  Under the definitions provided in §63.761, the facility is a natural gas production field facility. As such, the definition of "major source" in §63.762 provides that only HAP emissions from glycol dehydration units and storage vessels are aggregated for a major source determination. The aggregated HAP emissions from the storage vessels are below the major HAP source threshold for a single HAP; therefore, the facility is an <b>area</b> source of HAP under subpart HH.  The TEG dehydrators are located in an area that is not within an UA plus
				offset and UC boundary (as defined in §63.761).

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FEDERAL REGU- LATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
				Under §63.764(e)(1)(ii), the owner or operator of an affected area source [TEG dehydrator] with <b>actual</b> average benzene emissions from the process vent to the atmosphere of less than 0.90 megagrams per year (~1 tpy) is exempt from the operational, recordkeeping and notification requirements in §63.764(d), provided that documentation of the exemption determination is maintained as required in §63.774(d)(1).
MACT 40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities	No		Under §63.1270, applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271.  A production segment natural gas compressor station is not in the natural gas transmission and storage source category covered by the subpart. Therefore, the regulation does not apply.
MACT 40 CFR 63 Subpart YYYY	National Emission Standards for Hazardous Air Pollutants From Stationary Combustion Turbines	No		Under § 63.6080, subpart YYYY establishes emission and operating limitations for stationary combustion turbines located at a major source of HAP emissions. Under § 63.6175, "Major source, as used in this subpart, has the same meaning as in §63.2, except that (3) For production field facilities, only HAP emissions from glycol dehydration units, storage vessel with the potential for flash emissions, combustion turbines and reciprocating internal combustion engines shall be aggregated for a major source determination "
				The facility is not a major source of HAP, and does not have any affected units as defined in the regulation. Therefore, the subpart does not apply.
MACT 40 CFR 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Potentially applicable	1, 5, 8, 16, 18, 22 and 23	40 CFR 63, Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from existing, new, modified and reconstructed stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP. The regulation contains provisions for initial and continuous compliance demonstration.  As defined at §63.6585(c), the station is an <b>major</b> source of HAP. Under §63.6590(a)(1)(i), a stationary RICE greater than 500 horsepower (hp) located at an major source of HAP is considered an "existing" unit if construction or
				reconstruction commenced before December 19, 2002. ("Construction" does not include the reinstallation of an existing engine at another location.)  Installed engine units 2, 3, 4, 5, 7, 13, 15, 19, 20 and 21 are each a 4-stroke, lean burn (4SLB) RICE with a site rating of more than 500 hp. As reflected in Table 2-A, each engine was constructed prior to the December 19, 2002.
				Therefore, each engine is an "existing" engine under the regulation.  Under §63.6590(b)(3)(ii), an existing 4SLB stationary RICE with site rating of more than 500 hp, located at a major source of HAP does not have to meet the requirements of the subpart and of subpart A, including initial notification requirements. Therefore, the subpart is not applicable to engine units 2, 3, 4, 5, 7, 13, 15, 19, 20 and 21.
				Waukesha 7042GL engine units 1, 5, 8, 16, 18, 22 and 23 are not currently installed. It is anticipated that units 1, 5, 8, 16, 18, 22 and 23 will also be existing engines under the subpart. The applicability of the subpart to RICE units 1, 5, 8, 16, 18, 22 and 23 will be evaluated upon installation.

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## State Regulations

Applicable state requirements are embodied in the New Mexico SIP, the New Mexico Administrative Code (NMAC), and the terms and conditions of any preconstruction permits issued pursuant to regulations promulgated through rulemaking under Title I of the CAA. A summary of the applicability of the NMACs is presented on the following pages.

### STATE REGULATIONS APPLICABILITY CHECKLIST

STATE REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
20.2.1 NMAC	General Provisions *	Yes	Facility	20.2.1 NMAC, <i>General Provisions</i> , establishes procedures for protecting confidential information, procedures for seeking a variance, NMAQB's authority to require sampling equipment, severability, the effective date for conformance with the NMACs, and prohibits the violation of other requirements in attempting to comply with NMACs.
				Although this regulation may apply to the facility, it does not impose any specific requirements.
20.2.2 NMAC	Definitions *	No		20.2.2 NMAC, <i>Definitions</i> , establishes definitions used throughout the remaining regulations.
				Although this regulation may apply to the facility, it does not impose any specific requirements on the operation of the facility as described in the permit. Therefore, the regulation is considered not applicable.
20.2.3 NMAC	Ambient Air Quality Standards	Yes	Facility	20.2.3 NMAC, Ambient Air Quality Standards, is a SIP approved regulation that limits the maximum allowable concentration of total suspended particulates (TSP), sulfur compounds, carbon monoxide (CO) and nitrogen dioxide (NO <sub>2</sub> ) in the areas of New Mexico under the jurisdiction of the Environmental Improvement Board. Under subsection 20.2.3.9, the requirements of the part are not considered applicable requirements under 20.2.70 NMAC (i.e., federally enforceable requirements), as defined by that part. However, the regulation applies to sources required to obtain a permit under 20.2.72 NMAC, and it does not limit which terms and conditions of permits issued pursuant to 20.2.72 NMAC are applicable requirements for permits issued pursuant to 20.2.70 NMAC.
20.2.5 NMAC	Source Surveillance	No		20.2.5 NMAC, <i>Source Surveillance</i> , establishes the NMAQB's authority to require recordkeeping/ surveillance upon request.  Although this regulation may apply to the facility, it does not impose any specific requirements on the operation of the facility as described in the permit. Therefore, the regulation is considered not applicable.
20.2.7 NMAC	Excess Emissions	Yes	Facility	20.2.7 NMAC, <i>Excess Emissions</i> , is applicable because it prohibits excess emissions and proscribes notification procedures in the event of excess emissions.
20.2.8 NMAC	Emissions Leaving New Mexico *	No		20.2.8 NMAC, <i>Emissions Leaving New Mexico</i> , establishes prohibitions on the release of pollutants that cross New Mexico State boundaries.
				Although this regulation may apply to the facility, it does not impose any specific requirements on the operation of the facility as described in the permit. Therefore, the regulation is considered not applicable.

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STATE REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No		20.2.33 NMAC, Gas Burning Equipment - Nitrogen Dioxide, does not apply to the station because the compressor station does not include new or existing gas burning equipment (external combustion emission sources, such as gas fired boilers and heaters) having a heat input of greater than 1,000,000 million British Thermal Units per year per unit.
20.2.34 NMAC	Oil Burning Equipment: NO <sub>2</sub>	No		20.2.34 NMAC, <i>Oil Burning Equipment: NO</i> <sub>2</sub> , does not apply to the station because the compressor station does not have oil burning equipment.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No		20.2.35 NMAC, <i>Natural Gas Processing Plant – Sulfur</i> , applies to new natural gas processing plants for which a modification commenced on or after July 1, 1974. The regulation is not applicable to the station because the facility is not a natural gas processing plant.
20.2.38 NMAC	Hydrocarbon Storage	No		20.2.38 NMAC, <i>Hydrocarbon Storage Facilities</i> , is not applicable because the facility does not store hydrocarbons containing hydrogen sulfide; does not have a hydrocarbon liquid throughput of 50,000 barrels or greater located within a municipality or within five miles of a municipality with population of 20,000 or more; nor is there a new hydrocarbon tank battery with storage capacity of 65,000 gallons or greater.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	RICE 1 - 8, 13, 15, 16, & 18 - 23;	20.2.61 NMAC, <i>Smoke and Visible Emissions</i> , limits visible emissions from stationary combustion equipment to less than 20 percent opacity.
			Reboilers 9b - 12b, 24b & 25b	The station compressor engines and dehydrator reboilers are subject to the regulation as they are each stationary combustion sources.
20.2.70 NMAC	Operating Permits	Yes		20.2.70 NMAC, <i>Operating Permits</i> , contains permitting requirements for major sources of criteria and hazardous air pollutants subject to Part 70 (Title V) permitting requirements.
				The facility Potential To Emit for criteria pollutants, HAPs and greenhouse gases exceeds the major source Title V permitting thresholds. Therefore, the regulation is applicable. The facility is currently permitted under Title V Operating Permit No. <b>P195-R3-M1</b> .
20.2.71 NMAC	Operating Permit Fees	Yes		20.2.71 NMAC, <i>Operating Permit Emission Fees</i> , specifies fees for emissions from facilities subject to Part 70 (Title V) permitting requirements under 20.2.70 NMAC.
				The regulation is applicable as the facility is subject to permitting requirements under 20.2.70 NMAC.
20.2.72 NMAC	Construction Permits	Yes		20.2.72 NMAC, <i>Construction Permits</i> , requires a construction [NSR] permit for stationary source with emissions greater than 10 pounds per hour or 25 tons per year of criteria pollutants.
				The station emissions exceed the permit requirement thresholds; therefore, the station is required to apply for and obtain an NSR permit. The construction (NSR) permit issued under 20.2.72 for this facility is permit No. 1032-M9-R1.
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes		20.2.73 NMAC requires that owners/operators intending to construct a new stationary source that has a potential emission rate (uncontrolled emissions) greater than 10 tons per year of any regulated air contaminant, or 1 ton per year of lead, must file a notice of intent (NOI) with the department.  The station emits regulated air pollutants in amounts greater than 10

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STATE REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
				tons per year. Therefore, the facility is subject to the regulation. The requirement to file an NOI with the Department is fulfilled with the application for a construction permit under 20.2.72 NMAC.
20.2.74 NMAC	Permits – PSD	No		20.2.74 NMAC, Permits, Prevention of Significant Deterioration (PSD), provides requirements for sources subject to permit requirements for PSD facilities.
				The facility emissions do not exceed the PSD permit threshold levels. Therefore, the regulation does not apply.
20.2.75 NMAC	Construction Permit Fees	Yes		20.2.75 NMAC, <i>Construction Permit Fees</i> , establishes the fee schedule associated with the filing of permits and permit revisions.
				The regulation is applicable to the facility for its construction permit submitted under 20.2.72 NMAC.
20.2.77 NMAC	New Source Performance Standards	Potentially applicable	1, 5, 8, 16, 18, 22 and 23; and new reciprocating compressors, pneumatic controllers, and the collection of fugitive emissions components	20.2.77 NMAC, <i>New Source Performance Standards</i> , incorporates by reference specific Standards of Performance for New Stationary Sources (NSPS) codified under 40 CFR 60, as amended through January 15, 2017.  The facility includes equipment that are potentially subject to NSPS subparts A, JJJJ and OOOOa.
20.2.78 NMAC	Emission Standards for HAPS	No		20.2.78 NMAC, <i>Emission Standards for Hazardous Air Pollutants</i> , incorporates by reference specific National Emission Standards for Hazardous Air Pollutants (NESHAPs) codified under 40 CFR 61, as amended through January 15, 2017.
				The regulation is not applicable as none of the emission units at the facility are subject to any NESHAP under 40 CFR 61.
20.2.79 NMAC	Permits – Nonattainment Areas	No		20.2.79 NMAC, <i>Permits - Nonattainment Areas</i> , is not applicable to the station because the compressor station is not located within a non-attainment area.
20.2.80 NMAC	Stack Heights	No		20.2.80 NMAC, <i>Stack Heights</i> , establishes guidelines for the selection of an appropriate stack height for the purposes of atmospheric dispersion modeling.
				Atmospheric dispersion modeling was previously provided in support of the facility's construction permit. Based on the NMAQB dispersion modeling guidance document, air quality dispersion modeling is not required for this Title V Operating Permit renewal application.
20.2.82 NMAC	MACT Standards for source categories of HAPS	Potentially applicable	1, 5, 8, 16, 18, 22 and 23	20.2.82 NMAC, Maximum Achievable Control Technology Standards for Source Categories of Hazardous Air Pollutants, incorporates by reference specified federal Maximum Available Control Technology (MACT) Standards codified in 40 CFR 63, as amended through January 15, 2017.
				The facility includes equipment that are potentially subject to MACT subpart ZZZZ.
20.2.84 NMAC	Acid Rain Permits	No		20.2.84 NMAC, <i>Acid Rain Permits</i> , is not applicable to the station because the compressor station does not operate an affected unit under the regulation.

<sup>\* =</sup> These NMACs are administrative in nature and do not establish prohibitions, standards, or requirements.

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## **Operational Plan to Mitigate Emissions**

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

- Title V Sources (20.2.70 NMAC): By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- NSR (20.2.72 NMAC), PSD (20.2.74 NMAC) & Nonattainment (20.2.79 NMAC) Sources: By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- Title V (20.2.70 NMAC), NSR (20.2.72 NMAC), PSD (20.2.74 NMAC) & Nonattainment (20.2.79 NMAC) Sources: By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.

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Saved Date: 9/19/2019

## **Alternative Operating Scenarios**

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

Alternative Operating Scenarios: Provide all information required by the department to define alternative operating scenarios. This includes process, material and product changes; facility emissions information; air pollution control equipment requirements; any applicable requirements; monitoring, recordkeeping, and reporting requirements; and compliance certification requirements. Please ensure applicable Tables in this application are clearly marked to show alternative operating scenario.

Construction Scenarios: When a permit is modified authorizing new construction to an existing facility, NMED includes a condition to clearly address which permit condition(s) (from the previous permit and the new permit) govern during the interval between the date of issuance of the modification permit and the completion of construction of the modification(s). There are many possible variables that need to be addressed such as: Is simultaneous operation of the old and new units permitted and, if so for example, for how long and under what restraints? In general, these types of requirements will be addressed in Section A100 of the permit, but additional requirements may be added elsewhere. Look in A100 of our NSR and/or TV permit template for sample language dealing with these requirements. Find these permit templates at: <a href="https://www.env.nm.gov/aqb/permit/aqb\_pol.html">https://www.env.nm.gov/aqb/permit/aqb\_pol.html</a>. Compliance with standards must be maintained during construction, which should not usually be a problem unless simultaneous operation of old and new equipment is requested.

In this section, under the bolded title "Construction Scenarios", specify any information necessary to write these conditions, such as: conservative-realistic estimated time for completion of construction of the various units, whether simultaneous operation of old and new units is being requested (and, if so, modeled), whether the old units will be removed or decommissioned, any PSD ramifications, any temporary limits requested during phased construction, whether any increase in emissions is being requested as SSM emissions or will instead be handled as a separate Construction Scenario (with corresponding emission limits and conditions, etc.

Not applicable.

## **Air Dispersion Modeling**

- 1) Minor Source Construction (20.2.72 NMAC) and Prevention of Significant Deterioration (PSD) (20.2.74 NMAC) ambient impact analysis (modeling): Provide an ambient impact analysis as required at 20.2.72.203.A(4) and/or 20.2.74.303 NMAC and as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines found on the Planning Section's modeling website. If air dispersion modeling has been waived for one or more pollutants, attach the AQB Modeling Section modeling waiver approval documentation.
- 2) SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions during routine or predictable startup, shutdown, or maintenance (SSM) using realistic worst case scenarios following guidance from the Air Quality Bureau's dispersion modeling section. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (<a href="http://www.env.nm.gov/aqb/permit/app\_form.html">http://www.env.nm.gov/aqb/permit/app\_form.html</a>) for more detailed instructions on SSM emissions modeling requirements.
- 3) Title V (20.2.70 NMAC) ambient impact analysis: Title V applications must specify the construction permit and/or Title V Permit number(s) for which air quality dispersion modeling was last approved. Facilities that have only a Title V permit, such as landfills and air curtain incinerators, are subject to the same modeling required for preconstruction permits required by 20.2.72 and 20.2.74 NMAC.

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). See #1 above. <b>Note:</b> Neither modeling nor a modeling waiver is required for VOC emissions.	
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3	X
above.	
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit	
replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	X

#### Check each box that applies:

See attached, approved modeling waiver for all pollutants from the facility.
See attached, approved modeling waiver for some pollutants from the facility.
Attached in Universal Application Form 4 (UA4) is a modeling report for all pollutants from the facility.
Attached in UA4 is a <b>modeling report for some</b> pollutants from the facility.
No modeling is required.

An ambient air quality impact analysis including dispersion modeling was previously submitted in the permit application for NSR permit 1032-M6. The dispersion modeling demonstrated compliance with the National Ambient Air Quality Standards and applicable PSD increments.

NSR revisions 1032-M7, -M8, and -M9 added malfunction emissions, revised monitoring frequency, and added produced water storage tanks, respectively. Dispersion modeling was not required.

## **Compliance Test History**

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

To show compliance with existing NSR permits conditions, you must submit a compliance test history. The table below provides an example.

## **Compliance Test History Table**

Unit No.	Test Description	Test Date
2	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Condition A201.A	June 5, 2018
3	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Condition A201.A	June 5, 2018
4	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Condition A201.A	October 31, 2018
6	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Condition A201.A	June 5, 2015
7	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Conditions A201.A & .B	June 28, 2019
13	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Conditions A201.A & .B	June 28, 2019
15	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Conditions A201.A & .B	June 28, 2019
19	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Conditions A201.A & .B	June 24, 2019
20	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Conditions A201.A & .B	June 24, 2019
21	Compliance test for NO <sub>X</sub> and CO, in accordance with Operating Permit P195-R3, Conditions A201.A & .B	June 24, 2019

Saved Date: 9/19/2019

## Addendum for Streamline Applications Do not print this section unless this is a streamline application.

Streamline Applications do not require a complete application. Submit Sections 1-A, 1-B, 1-D, 1-F, 1-G, 2-A, 2-C thru
L, Sections 3 thru 8, Section 13, Section 18, Section 22, and Section 23 (Certification). Other sections may be required
at the discretion of the Department. 20.2.72.202 NMAC Exemptions do not apply to Streamline sources. 20.2.72.219
NMAC revisions and modifications do not apply to Streamline sources, thus 20.2.72.219 type actions require a complete
new application submittal. Please do not print sections of a streamline application that are not required.

Not applicable.

Saved Date: 9/19/2019

## **Requirements for Title V Program**

Do not print this section unless this is a Title V application.

#### Who Must Use this Attachment:

- \* Any major source as defined in 20.2.70 NMAC.
- \* Any source, including an area source, subject to a standard or other requirement promulgated under Section 111 Standards of Performance for New Stationary Sources, or Section 112 Hazardous Air Pollutants, of the 1990 federal Clean Air Act ("federal Act"). Non-major sources subject to Sections 111 or 112 of the federal Act are exempt from the obligation to obtain an 20.2.70 NMAC operating permit until such time that the EPA Administrator completes rulemakings that require such sources to obtain operating permits. In addition, sources that would be required to obtain an operating permit solely because they are subject to regulations or requirements under Section 112(r) of the federal Act are exempt from the requirement to obtain an Operating Permit.
- \* Any Acid Rain source as defined under title IV of the federal Act. The Acid Rain program has additional forms. See <a href="http://www.env.nm.gov/aqb/index.html">http://www.env.nm.gov/aqb/index.html</a>. Sources that are subject to both the Title V and Acid Rain regulations are encouraged to submit both applications simultaneously.
- \* Any source in a source category designated by the EPA Administrator ("Administrator"), in whole or in part, by regulation, after notice and comment.

#### 19.1 - 40 CFR 64, Compliance Assurance Monitoring (CAM) (20.2.70.300.D.10.e NMAC)

Any source subject to 40CFR, Part 64 (Compliance Assurance Monitoring) must submit all the information required by section 64.7 with the operating permit application. The applicant must prepare a separate section of the application package for this purpose; if the information is already listed elsewhere in the application package, make reference to that location. Facilities not subject to Part 64 are invited to submit periodic monitoring protocols with the application to help the AQB to comply with 20.2.70 NMAC. Sources subject to 40 CFR Part 64, must submit a statement indicating your source's compliance status with any enhanced monitoring and compliance certification requirements of the federal Act.

The 32-7 CDP is not subject to 40 CFR, Part 64, Compliance Assurance Monitoring (CAM); consequently, a monitoring protocol is not required with this application.

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#### **19.2 - Compliance Status** (20.2.70.300.D.10.a & 10.b NMAC)

Describe the facility's compliance status with each applicable requirement at the time this permit application is submitted. This statement should include descriptions of or references to all methods used for determining compliance. This statement should include descriptions of monitoring, recordkeeping and reporting requirements and test methods used to determine compliance with all applicable requirements. Refer to Section 2, Tables 2-N and 2-O of the Application Form as necessary. (20.2.70.300.D.11 NMAC) For facilities with existing Title V permits, refer to most recent Compliance Certification for existing requirements. Address new requirements such as CAM, here, including steps being taken to achieve compliance.

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The 32-7 CDP is in compliance with all applicable requirements affecting the facility. A copy of Part 1 (Permit Requirements Certification Table) of the 2019 Annual Compliance Certification (ACC) is provided in Section 20, Other Relevant Information. It identifies the requirements of the current Title V operating permit and the methods and data used to determine compliance with that permit. It is assumed that compliance with the Title V operating permit ensures compliance with the construction permit and New Mexico regulations.

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### **19.3 - Continued Compliance** (20.2.70.300.D.10.c NMAC)

Provide a statement that your facility will continue to be in compliance with requirements for which it is in compliance at the time of permit application. This statement must also include a commitment to comply with other applicable requirements as they come into effect during the permit term. This compliance must occur in a timely manner or be consistent with such schedule expressly required by the applicable requirement.

The 32-7 CDP will continue to be in compliance with applicable requirements for which it is in compliance at the time of this permit application. In addition, the station will, in a timely manner or consistent with such schedule expressly required by the applicable requirement, comply with other applicable requirements as they come into effect during the permit term.

**19.4** - Schedule for Submission of Compliance (20.2.70.300.D.10.d NMAC)

You must provide a proposed schedule for submission to the department of compliance certifications during the permit term. This certification must be submitted annually unless the applicable requirement or the department specifies a more frequent period. A sample form for these certifications will be attached to the permit.

The submittal of compliance certifications during the five-year term of the operating permit will occur annually.

#### 19.5 - Stratospheric Ozone and Climate Protection

In addition to completing the four (4) questions below, you must submit a statement indicating your source's compliance status with requirements of Title VI, Section 608 (National Recycling and Emissions Reduction Program) and Section 609 (Servicing of Motor Vehicle Air Conditioners).

1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-

- depleting substances? No
- 2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? (If the answer is yes, describe the type of equipment and how many units are at the facility.)
- 3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? Yes
- 4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.)

The station does not produce, manufacture, transform, destroy, import, or export any stratospheric ozone-depleting substances (CFCs, HCFCs); does not maintain or service motor vehicle air conditioning units or refrigeration equipment; and does not sell, distribute, or offer for sale any product that may contain stratospheric ozone-depleting substances.

Form-Section 19 last revised: 8/15/2011 Section 19, Page 2 Saved Date: 9/20/2019 Harvest shall continue to maintain compliance with the conditions stipulated in 40 CFR 82, Subparts A-G of the Stratospheric Ozone Protection Program (Title VI of the Clean Air Act Amendments).

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### 19.6 - Compliance Plan and Schedule

Applications for sources, which are not in compliance with all applicable requirements at the time the permit application is submitted to the department, must include a proposed compliance plan as part of the permit application package. This plan shall include the information requested below:

#### A. Description of Compliance Status: (20.2.70.300.D.11.a NMAC)

A narrative description of your facility's compliance status with respect to all applicable requirements (as defined in 20.2.70 NMAC) at the time this permit application is submitted to the department.

#### **B.** Compliance plan: (20.2.70.300.D.11.B NMAC)

A narrative description of the means by which your facility will achieve compliance with applicable requirements with which it is not in compliance at the time you submit your permit application package.

#### C. Compliance schedule: (20.2.70.300D.11.c NMAC)

A schedule of remedial measures that you plan to take, including an enforceable sequence of actions with milestones, which will lead to compliance with all applicable requirements for your source. This schedule of compliance must be at least as stringent as that contained in any consent decree or administrative order to which your source is subject. The obligations of any consent decree or administrative order are not in any way diminished by the schedule of compliance.

## **D. Schedule of Certified Progress Reports:** (20.2.70.300.D.11.d NMAC)

A proposed schedule for submission to the department of certified progress reports must also be included in the compliance schedule. The proposed schedule must call for these reports to be submitted at least every six (6) months.

#### E. Acid Rain Sources: (20.2.70.300.D.11.e NMAC)

If your source is an acid rain source as defined by EPA, the following applies to you. For the portion of your acid rain source subject to the acid rain provisions of title IV of the federal Act, the compliance plan must also include any additional requirements under the acid rain provisions of title IV of the federal Act. Some requirements of title IV regarding the schedule and methods the source will use to achieve compliance with the acid rain emissions limitations may supersede the requirements of title V and 20.2.70 NMAC. You will need to consult with the Air Quality Bureau permitting staff concerning how to properly meet this requirement.

**NOTE**: The Acid Rain program has additional forms. See <a href="http://www.env.nm.gov/aqb/index.html">http://www.env.nm.gov/aqb/index.html</a>. Sources that are subject to both the Title V and Acid Rain regulations are **encouraged** to submit both applications **simultaneously**.

The 32-7 CDP is in compliance with all applicable requirements; consequently, a compliance plan, a compliance schedule, and a schedule of certified progress reports is not required.

The 32-7 CDP is not equipped with any acid rain sources; consequently, compliance with the acid rain provisions is not required as a part of this permit application.

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#### 19.7 - 112(r) Risk Management Plan (RMP)

Any major sources subject to section 112(r) of the Clean Air Act must list all substances that cause the source to be subject to section 112(r) in the application. The permittee must state when the RMP was submitted to and approved by EPA.

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The 32-7 CDP is not subject to 40 CFR 68, Chemical Accident Prevention Provisions; consequently, a Risk Management Plan is not required.

#### 19.8 - Distance to Other States, Bernalillo, Indian Tribes and Pueblos

Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B NMAC)?

(If the answer is yes, state which apply and provide the distances.)

Yes, the property on which the station is constructed and operated on is closer than 80 km (50 miles) from other states, local pollution control programs and Indian tribes and pueblos as described below:

Neighboring States, Class I Areas, and Indian Lands

	Approximate Distance to Facility (kilometers)
Neighboring States	
Colorado	7.5
Indian Lands	
Southern Ute Tribe	7.5
Jicarilla Apache Tribe	32.4
Navajo Nation	34.2
Ute Mountain Ute Tribe	61.4

#### 19.9 - Responsible Official

The responsible official for the 32-7 CDP is Travis Jones, EH&S Manager.

#### **Section 20**

#### **Other Relevant Information**

<u>Other relevant information</u>. Use this attachment to clarify any part in the application that you think needs explaining. Reference the section, table, column, and/or field. Include any additional text, tables, calculations or clarifying information.

Additionally, the applicant may propose specific permit language for AQB consideration. In the case of a revision to an existing permit, the applicant should provide the old language and the new language in track changes format to highlight the proposed changes. If proposing language for a new facility or language for a new unit, submit the proposed operating condition(s), along with the associated monitoring, recordkeeping, and reporting conditions. In either case, please limit the proposed language to the affected portion of the permit.

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As discussed in Section 19.2, this section contains the Part 1 (Permit Requirements Certification Table) of the 2019 Annual Compliance Certification (ACC).

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# Title V Annual Compliance Certification for Permits P195-R3 & P195-R3M1

#### Title (TV) Permit Administration Amendment

On December 19, 2018 NMED AQB issued an Administrative Amendment to Operating Permit P195-R3.

The Administrative Amendment P195-R3M1 corrected the following:

a. Permittee is changed to Harvest Four Corners LLC

1755 Arroyo Dr

**Bloomfield, NM 87413** 

b. Facility Owner is Harvest Four Corners LLC

1755 Arroyo Dr

**Bloomfield, NM 87413** 

For this Administrative Amendment (P195-R3M1), the facility can use one Annual Compliance Certification (ACC) Form which will cover both TV Permits.

Although the facility is only required to submit one ACC Form, the facility shall submit **two (2)** separate TV Report Certification Forms. Each form shall list the corresponding TV Permit number, TV Permit Issue Date and Reporting Period.

Please note that this is a one-time authorization. Submittal forms for future Administrative Revisions will be evaluated on a case by case basis.

This form can also be used for future submittals that cover only the P195-R3M1 permit.

## **Annual Compliance Certification - Permit Requirements Certification Table**

Annual Compl	iance Certification Data for Title V Permit Nos. P195-R3 & P195-R	.3M1			
Was this facility continuous every condition in resp	inuously in compliance with all conditions of this permit during the reporting period? (Did you cloonse to question 3?)	heck either "Yes'	" or "N/A" for	⊠ Yes	□ No
<ol> <li>Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.</li> <li>If you answered No to question 3, list all deviations in the Deviations section.         For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.         For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start &amp; End Dates of the deviation.         Please indicate in b), your Description, whether each deviation has been previously reported to NMED.</li> </ol>				3. Was this fac continuously in with all require condition during reporting period	compliance ments of this g the
FACILITY SPECIF	IC REQUIREMENTS				
A101 Permit Duration	on (expiration)				
	rmit is five (5) years. It will expire five years from the date of issuance. Application for renewal of the of expiration. (20.2.70.300.B.2 and 302.B NMAC)	of this permit is d	lue twelve (12)	⊠ Yes	□ No
	of a renewal application at least twelve months prior to January 31, 2023 (the expiration date ce with this requirement.	e of this permit	P019-R3) will	□ N/A	
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
disapprove the renewa	on (expiration)  upplete application for a permit renewal is submitted, consistent with 20.2.70.300 NMAC, but the Dal permit before the end of the term of the previous permit, then the permit shall not expire and all effect until the renewal permit has been issued or disapproved. (20.2.70.400.D NMAC)			⊠ Yes	□ No
	of a renewal application at least twelve months prior to January 31, 2023 (the expiration date ce with this requirement.	e of this permit	P019-R3) will	□ N/A	
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A102 Facility: Describe B. This facility is local	<b>ription</b> ted approximately 9 miles north-northeast of Navajo Dam, New Mexico in San Juan County. (20.2	70.302.A(7) NM	fAC)	⊠ Yes	□ No
Methods: Semi-annua	al reports and this ACC are used to determine that the source continues to comply with this condition	n.		□ N/A	
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date	□ N/A	
A103 Facility: Applicable Regulations  A. The permittee shall comply with all applicable sections of the requirements listed in Table 103.A  Methods: Semi-annual reports and the annual emissions inventory are used to demonstrate compliance with the identified applicable requirements of				⊠ Yes	□ No

1. Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.  2. If you answered No to question 3, list all deviations in the Deviations section.  For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.  For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start & End Dates of the deviation.  Please indicate in b), your Description, whether each deviation has been previously reported to NMED.					compliance ments of this g the 1?
Table 103-A.					
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A103 Facility: Applicable Regulations  C. Compliance with the terms and conditions of this permit regarding source emissions and operation demonstrate compliance with national ambient air quality standards specified at 40 CFR 50, which were applicable at the time air dispersion modeling was performed for the facility's NSR Permit 1032-M4 in 2004.					□ No
<b>Methods:</b> Semi-annua permit.	l reports and the annual emissions inventory are used to demonstrate compliance with the identified	applicable requi	rements of this	□ N/A	
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
NMAC) and/or equipmed Methods: Semi-annua	lated Sources  the emission units authorized for this facility. Emission units identified as insignificant or trivial action nent not regulated pursuant to the Act are not included.  If reports and the annual emissions inventory, along with the Management of Change Request (Nathorized equipment has been added or operated during the applicable period.	`		⊠ Yes	□ No
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A. Table 105.A lists all the pollution control equipment required for this facility. Each emission point is identified by the same number that was assigned to it in the permit application.  Methods: Semi-annual reports and the annual emissions inventory, along with the Management of Change Request (MOCR) procedures, are used to determine that control equipment has been utilized during the applicable period.  Deviations: Unit ID Cause & Description of Deviation or Tracking number End Date			⊠ Yes □ N/A	□ No	
A106 Facility: Allow	ahla Emissians				
A. The following Section lists the emission units, and their allowable emission limits.  (40 CFR 50; 40 CFR 60, Subparts A, JJJJ, and OOOO; 40 CFR 63, Subparts A, HH, and ZZZZ; Paragraphs 1, 7, and 8 of 20.2.70.302.A NMAC; and NSR Permit 1032-M8).  Methods: Semi-annual reports, periodic monitoring, the annual emissions inventory and this ACC are used to determine that the source continues to comply with allowable emissions.				⊠ Yes □ N/A	□ No

1. Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.  2. If you answered No to question 3, list all deviations in the Deviations section.  For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.  For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start & End Dates of the deviation.  Please indicate in b), your Description, whether each deviation has been previously reported to NMED.				3. Was this facili continuously in compact with all requirem condition during reporting period?	ompliance ents of this the
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A107 Facility: Allowable Startup, Shutdown, & Maintenance (SSM) and Malfunction Emissions  A. The maximum allowable SSM and Malfunction emissions limits for this facility are listed in Table 107.A and were relied upon by the Department to determine compliance with applicable regulations.  Methods: Records of SSM emissions are maintained to ensure compliance.  Deviations: Unit ID				⊠ Yes □ N/A	□ No
A107 Facility: Allowable Startup, Shutdown, & Maintenance (SSM) and Malfunction Emissions  B. The authorization of emission limits for startup, shutdown, maintenance, and malfunction does not supersede the requirements to minimize emissions according to Conditions B101.C and B107.A.  Methods: SSM emissions are minimized in accordance with the facility SSM Plan  Deviations: Unit ID				⊠ Yes	□ No
A107 Facility: Allowable Startup, Shutdown, & Maintenance (SSM) and Malfunction Emissions  C. SSM VOC Emissions for Venting of Gas  Requirement: The permittee shall perform a facility inlet gas analysis once every calendar year and complete the following recordkeeping to demonstrate compliance with routine and predictable startup, shutdown, and maintenance (SSM) emission limits in Table 107.A. (NSR Permit 1032-M8, Condition A107.C, revised)  Monitoring: The permittee shall monitor the permitted routine and predictable startups and shutdowns and scheduled maintenance events.  Recordkeeping:  (1) To demonstrate compliance, each month records shall be kept of the cumulative total VOC emissions due to SSM events during the first 12 months due to SSM events and, thereafter of the monthly rolling 12-month total of VOC emissions due to SSM events.  (2) 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 and parameters used in calculations in accordance with Condition B109, except the requirement in B109.E to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.				⊠ Yes □ N/A	□ No

1. Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.  2. If you answered No to question 3, list all deviations in the Deviations section.  For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.  For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start & End Dates of the deviation.  Please indicate in b), your Description, whether each deviation has been previously reported to NMED.					liance of this
Reporting: The permi	ttee shall report in accordance with Section B110.				
Methods: Records of the applicable semi-an	SSM events and associated volumes, along with extended gas analyses, are maintained to ensure nual report.	compliance and	are reported in		
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
	able Startup, Shutdown, & Maintenance (SSM) and Malfunction Emissions  Emissions for venting of gas				
demonstrate compliand	ermittee shall perform a facility inlet gas analysis once every calendar year and complete the with malfunction (M1) emission limits in Table 107.A. (NSR Permit 1032-M8, Condition A107.4) enittee shall monitor all malfunction events that result in VOC emissions including identification of s.	C, revised)			
	ompliance, each month records shall be kept of the cumulative total VOC emissions due to malfur	nction events dur	ing the first 12	⊠ Yes □	
months and, thereafter of the monthly rolling 12-month total of VOC emissions due to malfunction events.  (2) Records shall also be kept of the inlet gas analysis, the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, a description of the event, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the pound per hour limits in Table 106.A (or the pound per hour limits in condition B110E, if applicable), under 20.2.7 NMAC.					No
(3) The permittee shall record the calculated emissions and parameters used in calculations in accordance with Condition B109, except the requirement in B109.E to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.					
Reporting: The permi	ttee shall report in accordance with Section B110.				
<b>Methods:</b> Malfunctions occurring during the applicable monitoring peirods were recorded and counted towards the permitted malfunction emission limit. Malfunctions occurring during the applicable monitoring peirods were recorded as required. No malfunctions occurred that were reported as per 20.2.7 NMAC.					
<b>Deviations:</b> Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A108 Facility: Hou	urs of Operation				

2. If you answered <i>No</i> to question For <i>all</i> Deviations that <i>p</i> For <i>all</i> Deviations that <i>a</i>	ther information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.  the status in the deviations in the Deviations section.  The section 3, list all deviations in the Deviations section.  The section 3, list all deviations in the Deviations section.  The section 3, list all deviations in the Deviations section.  The section 3, list all deviations in the Deviations section.  The section 3, list all deviation of the Deviation, and c) the Start section in the section of the Deviation, and c) the Start section in the section of the Deviation, and c) the Start section in the section of the Deviation, and c) the Start section in the section of the Deviation, and c) the Start section in the section of the Deviation, and c) the Start section in the section of the Deviation in the section of the Deviation in the section of the Deviation in the section of the Start section of the Deviation in the section of the Start section of the Deviation in the section of the Start section of the Start section of the Start section of the Deviation in the Start section of	t & End Dates of the	deviation.	3. Was this facil continuously in countinuously in countinuously in counting and the condition during reporting period.	compliance nents of this the
<b>A.</b> This facility is a operation.	uthorized for continuous operation. Monitoring, recordkeeping, and reporting are not required	to demonstrate	compliance wi	th continuous	hours of
A109 Facility: Rej	porting Schedules				
	tual Report of monitoring activities is due within 45 days following the end of every 6-month region May 1 <sup>st</sup> and November 1 <sup>st</sup> of each year.	porting period.	The six-month	⊠ Yes	□ No
	emi-annual report associated with this ACC was submitted December 12, 2018, within 45 days of sociated with this ACC by June 14 will demonstrate compliance with this requirement.	October 31. Su	ubmittal of the	□ N/A	
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
	porting Schedules  Compliance Certification Report is due within 30 days of the end of every 12-month reporting pools of each year.	eriod. The 12-m	onth reporting	<b>⊠</b> Yes	□ No
Methods: Submittal of this ACC by May 30 will demonstrate compliance with this requirement.				□ N/A	
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
	el and Fuel Sulfur Requirements el Sulfur Requirements (Units 1-8,13,15,16,18-23; 9b-12b, 24b, 25b)				
	ombustion emission units shall combust only natural gas containing no more than 0.20 grains of to nit 1032-M8, Condition A110.A, revised)	tal sulfur per 10	0 dry standard		
Monitoring: None. (	Compliance is demonstrated through records.			<b>M W</b>	□ N.
Recordkeeping:				⊠ Yes  □ N/A	∐ No
	all demonstrate compliance with the natural gas or fuel oil limit on total sulfur content by maintair t, tariff sheet or transportation contract for the gaseous or liquid fuel, or fuel gas analysis, specifying t				
(2) If fuel gas analysis	is is used, the analysis shall occur not less than 9 months and not greater than 15 months since the pre-	evious analysis.			
Reporting: The perm	nittee shall report in accordance with Section B110.				
Methods: Only natura	al gas is used for fuel. Records of monitoring fuel sulfur content are included in the applicable semi-	annual report.			

1. Provide <i>Method(s)</i> or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.  2. If you answered <i>No</i> to question 3, list <i>all</i> deviations in the <i>Deviations</i> section.  For <i>all</i> Deviations that <i>produced</i> excess emissions, provide <i>only</i> <b>a</b> ) the AQBCR EER Tracking Number.  For <i>all</i> Deviations that <i>did not produce</i> excess emissions, provide <b>a</b> ) The Unit ID, <b>b</b> ) The Cause of and a Description of the Deviation, and <b>c</b> ) the Start & End Dates of the deviation.  Please indicate in <b>b</b> ), your <i>Description</i> , whether each deviation has been previously reported to NMED.				3. Was this facili continuously in co with all requirement condition during treporting period?	ompliance ents of this the
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A. 20.2.61 NMAC Opacity  A. 20.2.61 NMAC Opacity Requirements (Units 1-8,13,15,16,18-23; 9b-12b, 24b, 25b)  Requirement: Visible emissions from each stationary combustion emission stack shall not equal or exceed an opacity of 20 percent in accordance with the requirements at 20.2.61 100 NMAC (NSR Permit 1032 M8 Condition A111 A revised)					
(b) If any visible emissions are observed during completion of the EPA Method 22 observation, subsequent opacity observations shall be conducted				⊠ Yes □ N/A	□ No
For the purposes of th	is condition, Startup mode is defined as the startup period that is described in the facility's startup pl	an.			
Recordkeeping:					
(2) If any visible em follows:	issions observations were conducted, the permittee shall keep records in accordance with the require	rements of Section	on B109 and as		
(a) For any visit Method 22,	ble emissions observations conducted in accordance with EPA Method 22, record the information Section 11.2.	on the form refe	renced in EPA		
	ity observations conducted in accordance with the requirements of EPA Method 9, record the inform 19, Sections 2.2 and 2.4.	nation on the form	n referenced in		
Reporting: The perm	ittee shall report in accordance with Section B110.				

<ol> <li>Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.</li> <li>If you answered No to question 3, list all deviations in the Deviations section.         For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.         For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start &amp; End Dates of the deviation.         Please indicate in b), your Description, whether each deviation has been previously reported to NMED.</li> </ol>				3. Was this facili continuously in co with all requirement condition during treporting period?	ompliance ents of this the
Methods: Only na	tural gas is used for fuel. No visible emissions were observed during the monitoring period.				
<b>Deviations:</b> Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
	ECIFIC REQUIREMENTS:				
OIL AND GAS IN	NDUSTRY				
A201 Engines	Emigrican Testing (Units 1 9 12 15 16 and 19 22)				
Requirement: Co	Emissions Testing (Units 1-8, 13,15,16, and 18-23)  mpliance with the allowable emission limits in Table 106.A shall be demonstrated by completing per (NSR 1032-M8, Condition A201.A, revised)	iodic emission to	ests during the		
	permittee shall test using a portable analyzer or EPA Reference Methods subject to the requirements as g Requirements. Emission testing is required for NOx and CO and shall be carried out as described below.		Section B108,		
Test results that de	monstrate compliance with the CO emission limits shall also be considered to demonstrate compliance v	with the VOC em	nission limits.		
For units with g/hp-hr emission limits, in addition to the requirements stated in Section B108, the engine load shall be calculated by using the following equation:			Yes     □ N/A	□ No	
Load(Hp) = I	Suel consumption (scfh) x Measured fuel heating value (LHV btu/scf)				
ľ	Manufacturer's rated BSFC (btu/bhp-hr) at 100% load or best efficiency				
(1) The testing for	specific units shall be conducted as follows:				
a. Testing fr	equency shall be once per quarter for Units 7, 8, 13, 15, 16, 18-23.				
b. Testing fr	equency shall be once per year for Units 1-6.				
c. The moni	toring period is defined as a calendar quarter or a calendar year.				
(2) The tests shall	continue based on the existing testing schedule.				
	monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur cl	loser together in	time than 25%		

<ol> <li>Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.</li> <li>If you answered No to question 3, list all deviations in the Deviations section.         For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.         For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start &amp; End Dates of the deviation.         Please indicate in b), your Description, whether each deviation has been previously reported to NMED.</li> </ol>				3. Was this facilit continuously in co with all requireme condition during t reporting period?	ompliance ents of this
(4) The permittee shall	follow the General Testing Procedures of Section B111.				
Recordkeeping: The permittee shall maintain records in accordance with Section B109, B110, and B111.					
	ttee shall report in accordance with Section B109, B110, and B111.				
	are maintained as required and are included with the applicable semi-annual reports.	G D.	E ID		
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A201 Engines  B. Catalytic Converter Operation (Units 7, 8, 13, 15, 16, 18-23)  Requirement: The units shall be equipped and operated with an AFR.  The permittee shall maintain the units according to manufacturer's or supplier's recommended maintenance, including replacement of oxygen sensor as necessary for oxygen-based controllers. (NSR 1032-M8, Condition A201.B, revised)  Monitoring: The unit(s) shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.  Recordkeeping: The permittee shall maintain records in accordance with Section B109.			⊠ Yes □ N/A	□ No	
	ttee shall report in accordance with Section B110.				
	catalyst maintenance are recorded in the SSM records of condition A107.C and included in the appl		-		
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
-	liance Test (Units 1,5,8,16,18,22 and 23, when installed)			⊠ Yes	□ No
<b>Requirement:</b> Compliance with the allowable emission limits in Table 106.A shall be demonstrated by performing an initial compliance test.			□ N/A		

<ol> <li>Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.</li> <li>If you answered No to question 3, list all deviations in the Deviations section.         For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.         For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start &amp; End Dates of the deviation.         Please indicate in b), your Description, whether each deviation has been previously reported to NMED.</li> </ol>				3. Was this facili continuously in c with all requirem condition during reporting period?	ompliance ents of this the
	permittee shall perform an initial compliance test in accordance with the General Testing Requirement for NOx and CO.	ents of Section B	111. Emission		
Test results that	emonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance	with the VOC er	nission limits.		
The monitoring e	xemptions of Section B108 do not apply to this requirement.				
For units with g/l	p-hr emission limits, the engine load shall be calculated by using the following equation:				
Load(Hp) =	Fuel consumption (scfh) x Measured fuel heating value (LHV btu/scf)				
	Manufacturer's rated BSFC (btu/bhp-hr) at 100% load or best efficiency				
Recordkeeping: The permittee shall maintain records in accordance with the applicable Sections in B109, B110, and B111.  Reporting: The permittee shall report in accordance with the applicable Sections in B109, B110, and B111.					
Methods: Units	, 5, 8, 16, 18, 22 and 23 had not been installed as of the end of this compliance period.				
<b>Deviations:</b> Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A201 Engines  D. Turbochargers for Engines (Units 1-8, 13,15,16, and 18-23)  Requirement: The Waukesha engines shall be equipped and operated with either high or low speed turbocharger. (NSR 1032-M8, Condition A201.D)  Monitoring: None.				⊠ Yes	□ No
<b>Recordkeeping:</b> For each engine, the permittee shall record if the engine is equipped with high or low speed turbochargers and shall maintain records in accordance with Section B109.				□ N/A	
Reporting: The	permittee shall report in accordance with Section B110.				
Methods: Maint annual reports.	enance and repair records are used to document proper operation of engines with turbochargers and i	ncluded in the ap	oplicable semi-		

1. Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.  2. If you answered No to question 3, list all deviations in the Deviations section.  For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.  For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start & End Dates of the deviation.  Please indicate in b), your Description, whether each deviation has been previously reported to NMED.				3. Was this facili continuously in cowith all requirem condition during reporting period?	ompliance ents of this the
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A201 Engines					
	Subpart JJJJ (Units 1,5,8,16,18,22 and 23, potentially)				
	its will be subject to 40 CFR 60, Subparts A and JJJJ if the unit is constructed (ordered) and man 30 and the permittee shall comply with the notification requirements in Subpart A and the specific r				
Monitoring: The perr limited to 60.4243.	nittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and	Subpart JJJJ, inc	luding but not	_	
				<b>⊠</b> Yes	☐ No
<b>Recordkeeping:</b> The not limited to 60.4245.	permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A	and Subpart JJJJ	, including but	□ N/A	
<b>Reporting:</b> The permi 60.4245.	ttee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart J	JJJ, including bu	t not limited to		
Methods: Units 1, 5, 8	1, 16, 18, 22 and 23 have not been installed to date.				
<b>Deviations:</b> Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A201 Engines					
	and Repair Monitoring (Units 1-6)				
Requirement: Compli	ance with the allowable emission limits in Table 106.A shall be demonstrated by properly maintain	ing and repairing	the units.		
	ance and repair shall meet the minimum manufacturer's or permittee's recommended maintenance s			<b>Yes</b>	☐ No
	ent, replacement, or repair of functional components with the potential to affect the operation cur for the following events:	i of an emission	unit snail be	□ N/A	
•	ace that takes a unit out of service for more than two hours during any twenty-four-hour period.			_ :	
· ´	rs that require a unit to be taken out of service for more than two hours in any twenty-four-hour per	iod.			
1					
Recordkeeping: The	permittee shall maintain records in accordance with Section B109, including records of maintena	nce and repairs a	activities and a		

<ol> <li>Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.</li> <li>If you answered No to question 3, list all deviations in the Deviations section.         For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.         For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start &amp; End Dates of the deviation.         Please indicate in b), your Description, whether each deviation has been previously reported to NMED.     </li> </ol>				3. Was this facili continuously in co with all requirement condition during to reporting period?	ompliance ents of this the
copy of the manufactu	rer's or permittee's recommended maintenance schedule.				
Reporting: The permi	ttee shall report in accordance with Section B110.				
Methods: Maintenand reports.	te and repair records for engines and dehys are maintained as required and included with appl	icable semi-annu	ual monitoring		
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A201 Engines					
G. 40 CFR 63, S	Subpart ZZZZ (Units 1,5,8,16,18,22 and 23, potentially)			I	
	its will be subject to 40 CFR 63, Subparts A and ZZZZ if they meet the applicability criteria in 4	0 CFR 63.6590.	The permittee	I	
shall comply with any	applicable notification requirements in Subpart A and any specific requirements of Subpart ZZZZ.			I	
				I	
Monitoring: The peri	mittee shall comply with all applicable monitoring requirements of 40 CFR 63, Subpart A and Subp	art ZZZZ.		I	
				⊠ Yes	□ No
Recordkeening: The	permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63, Subpart A ar	nd Subpart 7.7.7.	including but		
not limited to 63.6655		ia saspari EEEE	, meraamg out	□ N/A	
				I	
Donorting: The narm	ittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and ZZZ	7 including but	not limited to	I	
63.6645, 63.6650, 63.9		z, including but	not minted to	I	
Methods: Units 1 5 8	3, 16, 18, 22 and 23 have not been installed to date.				
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date	I	
Deviations. Ont in	Cause & Description of Deviation of Tracking number	Start Date	Lift Date	I	
A202 Glycol Dehy	drators				
	as Analysis and GRI-GLYCalc calculation (Units 9a-12a, 24a, 25a)			I	
	iance with the allowable VOC emission limits in Table 106.A shall be demonstrated by cond	ucting an annual	extended gas	⊠ Yes	□ Na
	ator inlet gas and by calculating emissions using GRI-GLYCalc. (NSR 1032-M8, Condition A202.		Catenaca gas	M Yes	□ No
•				□ N/A	
Monitorings The manual	nittee shall conduct an annual GPI GlyCole analysis using the most recent sytanded and analysis	and varify that	nnut data. The		
Monitoring: The permittee shall conduct an annual GRI-GlyCalc analysis using the most recent extended gas analysis, and verify the input data. The permittee may use a method of calculating dehydrator emissions other than the most current version of GRI-GlyCalc if approved by the Department				I	

<ol> <li>Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.</li> <li>If you answered No to question 3, list all deviations in the Deviations section.         For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.         For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start &amp; End Dates of the deviation.         Please indicate in b), your Description, whether each deviation has been previously reported to NMED.</li> </ol>			3. Was this facility <i>continuously</i> in con with <i>all</i> requirement condition during the reporting period?	npliance its of this	
Changes in the calcula	red emissions due solely to a change in the calculation methodology shall not be deemed an exceeda	ance of an emission	on limit.		
<b>Recordkeeping:</b> The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYcalc model. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYcalc.					
Reporting: The permi	tee shall report in accordance with Section B110.				
<b>Methods:</b> Dehydrator annual monitoring repo	extended gas analysis and GLYCalc input/output records are maintained as required and are inclorts	uded with the ap	plicable semi-		
<b>Deviations:</b> Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
Requirement: Complements for each unit shall (NSR 1032-M8, Condamn Monitoring: The perm 30 <sup>th</sup> , July 1 <sup>st</sup> through Setting.  Recordkeeping: The perm Reporting: The perm	circulation rate (Units 9a-12a, 24a, 25a) ance with the allowable VOC emission limits in Table 106.A shall be demonstrated by monitorinot exceed 150 gallons per hour (2.5 gallons per minute). tion A202.B, revised)  iittee shall monitor the circulation rate quarterly, based on a calendar quarter (January 1 <sup>st</sup> through Meptember 30 <sup>th</sup> , and October 1 <sup>st</sup> through December 31 <sup>st</sup> ). Monitoring shall include a calibration or permittee shall maintain records that include a description of the monitoring and are in accordance with the shall report in accordance with Section B110.	farch 31 <sup>st</sup> , April 1 visual inspection vith Section B109	I through June n of pump rate	⊠ Yes □ N/A	□ No
-	glycol pump recircuation rate records are maintained as required and are included in the applicable				
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
	Irators  ce Inspection (Units 9a-12a, 24a, 25a)  onstrate compliance with the allowable emission limits in Table 106 A, the flash tank vent shall be	routed at all time	es to a process	⊠ Yes	□ No

<ol> <li>Provide Method(s) or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.</li> <li>If you answered No to question 3, list all deviations in the Deviations section.         For all Deviations that produced excess emissions, provide only a) the AQBCR EER Tracking Number.         For all Deviations that did not produce excess emissions, provide a) The Unit ID, b) The Cause of and a Description of the Deviation, and c) the Start &amp; End Dates of the deviation.         Please indicate in b), your Description, whether each deviation has been previously reported to NMED.</li> </ol>				3. Was this facili continuously in cowith all requirement condition during reporting period?	ompliance ents of this the
	f-gas to be either reintroduced back into the natural gas pipeline or fuel supply line.				
(NSR 1032-M8, Cond	tion A202.C, revised)				
Monitoring: The permittee shall inspect the glycol dehydrator and the control equipment semi-annually to ensure it is operating as initially designed.					
	permittee shall record the inspection and the results of all equipment and control device inspection	ons chronological	lly, noting any		
maintenance or repairs	needed to bring the dehydrator into compliance.				
	ttee shall report in accordance with Section B110.				
Methods: Records of dehydrator inspections are maintained as required and included in the applicable semi-annual monitoring reports.					
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
<ul> <li>A202 Glycol Dehydrators</li> <li>D. 40 CFR 63, Subpart HH (Units 9a-12a, 24a, 25a)</li> <li>Requirement: The units are subject to 40 CFR 63, Subpart HH and the permittee shall comply with all applicable requirements. (NSR 1032-M8, Condition A202.D, revised)</li> <li>Monitoring: The permittee shall monitor as required by 40 CFR 63.772(b)(2) to demonstrate facility is exempt from general standards.</li> <li>Recordkeeping: The permittee shall generate and maintain the records required by 40 CFR 63.774(d)(1)(ii) to demonstrate compliance with the general standard exemptions found in 40 CFR 63.764(e).</li> </ul>			⊠ Yes □ N/A	□ No	
Reporting: The permittee shall meet all applicable reporting in 40 CFR 63, Subparts A and HH and in Section B110.  Methods: Dehydrator annual GLYCalc analysis records, including gas analysis, demonstrating dehydrator exemption status are maintained as required.					
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date		
A209 Fugitives A. 40 CFR 60, 8	Subpart OOOO and/or OOOOa (Compressors for Units 1,5,8,16,18,22 and 23, potentially)			⊠ Yes	□ No

. Provide <i>Method(s)</i> or other information or other facts used to determine the compliance status in the "Methods:" row beneath each permit condition.  If you answered <i>No</i> to question 3, list <i>all</i> deviations in the <i>Deviations</i> section.  For <i>all</i> Deviations that <i>produced</i> excess emissions, provide <i>only</i> <b>a)</b> the AQBCR EER Tracking Number.  For <i>all</i> Deviations that <i>did not produce</i> excess emissions, provide <b>a)</b> The Unit ID, <b>b)</b> The Cause of and a Description of the Deviation, and <b>c)</b> the Start & End Dates of the deviation.  Please indicate in <b>b)</b> , your <i>Description</i> , whether each deviation has been previously reported to NMED.			3. Was this facility <i>continuously</i> in compliance with <i>all</i> requirements of this condition during the reporting period?	
after the applicability	its will be subject to 40 CFR 60, Subparts A and OOOO and/or OOOOa if the source is constructed at a 10 CFR 60.5365 or 60.5365a and the permittee shall comply with the notification requor Subpart OOOO and/or OOOOa, including standards in 60.5385 or 60.5385a.			□ N/A
<b>Monitoring:</b> The permittee shall comply with all applicable monitoring requirements in 40 CFR 60, Subpart A and Subpart OOOO and/or OOOOa, including but not limited to 60.5410 or 60.5410a and 60.5415 or 60.5415a.				
<b>Recordkeeping:</b> The permittee shall comply with all applicable recordkeeping requirements in 40 CFR 60, Subpart A and Subparts OOOO and/or OOOOa, including but not limited to 60.5420 or 60.5420a.				
<b>Reporting:</b> The permittee shall comply with all applicable reporting requirements in 40 CFR 60, Subpart A and Subpart OOOO and/or OOOOa, including but not limited to 60.5420 or 60.5420a, and in Section B110.				
Methods: Units 1, 5, 8, 16, 18, 22 and 23 have not been installed to date. Applicability will be determined upon installation.				
Deviations: Unit ID	Cause & Description of Deviation or Tracking number	Start Date	End Date	

# **PART B General Conditions**

1. Have these General Conditions been met during this reporting period? <u>Check only one box per subject heading.</u>	2. Was this facility <i>continuously</i> in compliance with this requirement during the reporting period?	
Explain answers in remarks row under subject heading.	1 01	
B101 Legal	<b>Yes No No N/A</b> − Explain Below	
<b>REMARKS:</b> Facility was in compliance with applicable requirements during the applicable period.		
B102 Authority	<b>∑</b> Yes <b>☐</b> No <b>☐</b> N/A – Explain Below	
<b>REMARKS:</b> Only the permitted owner operated the facility during the applicable period.		
B103 Annual Fee	∑ Yes □ No □ N/A – Explain Below	
<b>REMARKS:</b> 2017 operating permit emission fees were submitted on May 7, 2018. The 2018 fee has not been paid as of the conclusion	of this compliance period.	
B104 Appeal Procedures	☐ Yes ☐ No ☒ N/A – Explain Below	
REMARKS: Department action.		
B105 Submittal of Reports and Certifications	∑ Yes □ No □ N/A – Explain Below	
<b>REMARKS:</b> Stack test reports, semi-annual reports and ACCs are submitted to the appropriate regulatory personnel		
B106 NSPS and/or MACT Startup, Shutdown, and Malfunction Operations	∑ Yes □ No □ N/A – Explain Below	
REMARKS: Although NSPS and NESHAP standards may apply to this facility, no units currently operating are subject to their requirements except recordkeeping requirements.		
B107 Startup, Shutdown, and Maintenance Operations	∑ Yes □ No □ N/A – Explain Below	
<b>REMARKS:</b> The facility is operated in accordance with the permittee's SSM work practice plan		
B108 General Monitoring Requirements	∑ Yes □ No □ N/A – Explain Below	
<b>REMARKS:</b> Periodic monitoring records are included in the applicable semi-annual reports		
B109 General Recordkeeping Requirements	∑ Yes □ No □ N/A – Explain Below	
<b>REMARKS:</b> Records are maintained in accordance with recordkeeping requirements.		
B110 General Reporting Requirements		
<b>REMARKS:</b> Reports are submitted in accordance with reporting requirements.		
B111 General Testing Requirements		
<b>REMARKS:</b> Testing that occurred during the applicable period was completed in accordance with the appropriate procedures		
B112 Compliance		
<b>REMARKS:</b> Records and permits are maintained as required. Representatives have not been denied access to the facility and applicable	e files during the applicable period.	

# **PART B General Conditions**

B113 Permit Reopening and Revocation	<b>∑</b> Yes <b>□</b> No <b>□</b> N/A – Explain Below			
REMARKS: No communication has been received from the regulating agency to indicate that the permit has been reopened, revoked or revised.				
B114 Emergencies				
REMARKS: No emergencies occurred during this period.				
B115 Stratospheric Ozone	☐ Yes ☐ No ☒ N/A – Explain Below			
<b>REMARKS:</b> Any service work is completed in accordance with the requirements of 40CFR82 subpart F.				
B116 Acid Rain Sources	☐ Yes ☐ No ☒ N/A – Explain Below			
<b>REMARKS:</b> The facility is not subject to 40CFR 72.				
B117 Risk Management Plan	☐ Yes ☐ No ☒ N/A – Explain Below			
<b>REMARKS:</b> The facility is not subject to 40CFR 68.				

### **Section 21**

#### **Addendum for Landfill Applications**

Do not print this section unless this is a landfill application.

Landfill Applications are not required to complete Sections 1-C Input Capacity and Production Rate, 1-E Operating Schedule, 17 Compliance Test History, and 18 Streamline Applications. Section 12 – PSD Applicability is required only for Landfills with Gas Collection and Control Systems and/or landfills with other non-fugitive stationary sources of air emissions such as engines, turbines, boilers, heaters. All other Sections of the Universal Application Form are required.

 $EPA\ Background\ Information\ for\ MSW\ Landfill\ Air\ Quality\ Regulations: \\ \underline{https://www3.epa.gov/airtoxics/landfill/landflpg.html}$ 

NM Solid Waste Bureau Website: https://www.env.nm.gov/swb/		
Not applicable.		

## **Section 22: Certification**

Company Name:	
I, Tous Sond, hereby certify the and as accurate as possible, to the best of my knowledge and pr	nat the information and data submitted in this application are true rofessional expertise and experience.
Signed this day of	ny oath or affirmation, before a notary of the State of
*Signature  Printed Name	Date  Date  Title
Scribed and sworn before me on this day of	202 . 2019
My authorization as a notary of the State of New M	expires on the
30day of001000R, 6	1019
Montager devel Smith Notary's Signature  Notary's Printed Name	Date  OFFICIAL SEAL  MONICA SANDOVAL  Notary Public State of New Mexico  My Commission Expires 1018012619