# NMED AIR QUALITY BUREAU NSR SIGNIFICANT REVISION

### DCP OPERATING COMPANY, LP Linam Ranch Gas Plant



Prepared By:

Jake Zenker - Senior Consultant

#### TRINITY CONSULTANTS

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December 2020

Project 203201.0113







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February 3, 2021

Mr. Ted Schooley Permit Programs Manager NMED Air Quality Bureau 525 Camino de los Marquez Suite 1 Santa Fe, NM 87505-1816

RE: Application for NSR Significant Revision
DCP Operating Company, LP – Linam Ranch Gas Plant (NSR No. 0039-M8R3)

Dear Mr. Schooley:

20.2.72.219.D(1)(a) NMAC to apply for a significant revision to the existing NSR minor source permit for the Linam Ranch Gas Plant. The facility is located approximately 7.0 miles west of Hobbs, NM in Lea County and is currently operating under NSR Permit No. 0039-M8-R3. The facility is currently major with respect to Title V and is minor with respect to PSD.

The purpose of this significant revision is to allow for stabilized (Unit LOAD-STAB) and unstabilized (Unit LOAD-UNS) truck loading emissions and associated haul road (Unit HAUL) emissions. Unstabilized and stabilized condensate loading is currently authorized during emergency events under NSR Permit Condition A203D. However, this permit application seeks to authorize loading under normal operating conditions. While DCP does not anticipate that loading emissions will be vented to the atmosphere, as they are collected by Units VRU and VRU-TMP, DCP seeks to conservatively authorized loading emissions with a 95% collection efficiency (for stabilized condensate loading), and pressurized hose disconnects (for unstabilized loading). Condition A203 shall be updated to reflect these requests. As the potential to emit (PTE) of the haul road will be less than 0.5 tpy, they will be exempt pursuant to 20.2.72.202.B(5) NMAC.

The format and content of the application are consistent with the Bureau's current policy regarding significant revisions; it is a complete application package using the latest relevant sections of the Universal Application Forms. Please feel free to contact me Alternatively, you may contact me at <a href="mailto:jzenker@trinityconsultants.com">jzenker@trinityconsultants.com</a> with any questions that you may have. Alternatively, you may contact Sam Hong Environmental Engineer at DCP Midstream at <a href="mailto:hSH-hong@dcpmidstream.com">HSH-hong@dcpmidstream.com</a> if you have any questions regarding this application.

Sincerely,

TRINITY CONSULTANTS

Jake Zenker Consultant

Cc:

Sam Hong, DCP Midstream

#### 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 1-1

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: ☐ Not Constructed ☑ Existing Permitted (or NOI) Facility ☐ Existing Non-permitted (or NOI) Facility
Minor Source: ☐ a NOI 20.2.73 NMAC  20.2.72 NMAC application or revision ☐ 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. ☐ Title V Operating, Title IV Acid Rain, and NPR
applications have no fees.
<b>☑</b> \$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: 20.2.72.219.D.(1)(a) 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 # II KIIOWII (SEE I	Opuating				
Sec	tion 1-A: Company Information	3 to 5 #s of permit IDEA ID No.): 589	Permit/NOI #: 0039M2R2				
1	Facility Name: Linam Ranch Gas Plant	Plant primary SIC Code (4 digits): 1321					
1		Plant NAIC code (6 digits):211130					
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): From Hobbs, NM travel 7 miles west on Hwy 62/180. Plant is adjacent to highway on the south.						
2	Plant Operator Company Name: DCP Operating Company, LP	Phone/Fax: (432) 620-5	5463/432-620-4162				
a	Plant Operator Address: 10 Desta Drive, Suite 500 West, Midland, TX 797	705					
b	Plant Operator's New Mexico Corporate ID or Tax ID: 036785						

3	Plant Owner(s) name(s): DCP Operating Company, LP	Phone/Fax: (432) 620-5463/ 432-620-4162						
a	Plant Owner(s) Mailing Address(s): 10 Desta Drive, Suite 500 West, Midland, TX 79705							
4	Bill To (Company): DCP Operating Company, LP	Phone/Fax: (432) 620-5463/ 432-620-4162						
a	Mailing Address: 10 Desta Drive, Suite 500 West, Midland, TX 79705	E-mail: HSHong@dcpmidstream.com						
5	□ Preparer: ☑ Consultant:	Phone/Fax: (505) 266-6611/ N/A						
a	Mailing Address: 9400 Holly Blvd NE, Building 3, Suite 300 Albuquerque, NM 87122	E-mail: aerenstein@trinityconsultants.com						
6	Plant Operator Contact: Sam Hong	Phone/Fax: (432) 620-5463/ 432-620-4162						
a	Address: 10 Desta Drive, Suite 500 West, Midland, TX 79705	E-mail: HSHong@dcpmidstream.com						
7	Air Permit Contact: Sam Hong	Title: Environmental Engineer						
a	E-mail: HSHong@dcpmidstream.com	Phone/Fax: (432) 620-5463/ 432-620-4162						
b	Mailing Address: 10 Desta Drive, Suite 500 West, Midland, TX 79705							
c	The designated Air permit Contact will receive all official correspondence	(i.e. letters, permits) from the Air Quality Bureau.						

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

	don't Di Carrent Lacinty 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? ✓ Yes □ No						
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): N/A						
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? N/A							
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAGEY SEE NO ■ N/A	C) or the capacity increased since 8/31/1972?						
6	Does this facility have a Title V operating permit (20.2.70 NMAC)?  ✓ Yes □ No	If yes, the permit No. is: P-094-R2						
7	Has this facility been issued a No Permit Required (NPR)?  ☐ Yes ☑ No	If yes, the NPR No. is: N/A						
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes ☑ No	If yes, the NOI No. is: N/A						
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)?   ☑ Yes □ No	If yes, the permit No. is: 0039-M8-R3						
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)?  ☐ Yes ☑ No	If yes, the register No. is: N/A						

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

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)								
a	a Current Hourly: 9.44 MMscf (actual) Daily: 225 MMscf (approximate) Annually: 82,125 MMscf (approximate)								
b	b Proposed Hourly: * Daily: * Annually: *								
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)								
a	Current	Hourly: 9.44 MMscf (actual)	Daily: 225 MMscf (approximate)	Annually: 82,125 MMscf (approximate)					
b	Proposed	Hourly: *	Daily: *	Annually: *					

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

	1011 2 . 1								
1	Section: 6	Range: 37E	Township: 19 S	County: Lea		Elevation (ft): 3,710			
2	UTM Zone:	12 or <b>☑</b> 13		Datum: □ NAD 27 □ NAD 83 ☑ WGS 84					
a	UTM E (in meter	rs, to nearest 10 meter	s): 660,740 m E	UTM N (in meters, to nearest	10 meters): 3	,618,810 m N			
b	AND Latitude (	(deg., min., sec.):	32° 41′ 43′′	Longitude (deg., min., see	c.): -103° 1′	7' 7''			
3	Name and zip o	code of nearest Ne	ew Mexico town: Hobbs, N	M 88240					
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From Hobbs, NM, travel 7 miles west on Hwy 62/180. Plant is adjacent to the highway on the south side.								
5	The facility is 7 miles west of Hobbs, NM 88240.								
6	Status of land at facility (check one): <b>☑</b> Private □ Indian/Pueblo □ Federal BLM □ Federal Forest Service □ Other (specify)								
7				a ten (10) mile radius (20 erated: <b>Municipalities</b> : H		B.2 NMAC) of the property (Counties: Lea			
8	<b>20.2.72</b> NMAC applications <b>only</b> : 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: States: Texas - 14.6 miles.								
9	Name nearest C	Class I area: Carls	bad Caverns National Park						
10	Shortest distance	ce (in km) from fa	acility boundary to the bour	ndary of the nearest Class I	area (to the r	nearest 10 meters): 110 km			
11				ons (AO is defined as the past residence, school or occur					
12	lands, including mining overburden removal areas) to nearest residence, school or occupied structure: 220 m  Method(s) used to delineate the Restricted Area: Continuous 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  Yes No A portable statione location or	c/operator intend to o onary source is no that can be re-ins	o operate this source as a pot a mobile source, such as talled at various locations,	ortable stationary source as an automobile, but a sourc such as a hot mix asphalt p	s defined in the that can be	20.2.72.7.X NMAC?			
14	•		nction with other air regulant number (if known) of the	ated parties on the same pro- 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.)

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1	Facility <b>maximum</b> operating (hours/day): 24	(days/week): 7	$(\frac{\text{weeks}}{\text{year}})$ : 52	$(\frac{\text{hours}}{\text{year}})$ : 8760			
2	Facility's maximum daily operating schedule (if less	s than $24 \frac{\text{hours}}{\text{day}}$ )? Start: N/A	□AM □PM	End:N/A	□AM □PM		
3	Month and year of anticipated start of construction: N/A – No construction is proposed						
4	Month and year of anticipated construction completion: N/A - No construction is proposed						
5	Month and year of anticipated startup of new or modified facility: N/A – No construction is proposed						
6	Will this facility operate at this site for more than on	e year?					

**Section 1-F: Other Facility 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 Compliance Order (CO) was recently issued on Aug 28, 2020; final settlement is pending. The CO involves numerous excess emissions reports for which the AQB has not accepted many of the affirmative defenses claimed by DCP.							
a	If yes, NOV date or description of issue: 8/26/2020			NOV Tracking No.: Multiple				
b	Is this application in response to any issue listed in 1-F, 1 or	r 1a above? □ Yes I	☑ No If Y	es, provide the 1c & 1d info below:				
c	Document Title: N/A	Date: N/A		nent # (or nd paragraph #): N/A				
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	applicatio	n? □ Yes <b>☑</b> No				
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 Pollu	tants (HAP)? 🗹 Yes	□No					
a	If Yes, what type of source? $\square$ Major ( $\square \ge 10$ tpy of any OR $\square$ Minor ( $\square < 10$ tpy of any			5 tpy of any combination of HAPS) 5 tpy of any combination of HAPS)				
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☐ Yes	☑ No						
	If yes, include the name of company providing commercial electric power to the facility:N/A							
a	Commercial power is purchased from a commercial utility site for the sole purpose of the user.	company, which spe	cifically d	oes 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." □ N/A (This is not a Streamline application.)

**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)

1	Responsible Official (20.2.70.300.D.2 NMAC): Randy C. DeLaune	Phone: (713) 268-7488						
a	R.O. Title: VP Operations Services	R.O. e-mail: RCDeLaune@Dcpmidstream.com						
b	R. O. Address: 5718 Westheimer, Suite 1900, Houston, TX 77057	-7057						
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC): Michael T. Allison	Phone: (575) 234-6425						
a	A. R.O. Title: Asset Director I	A. R.O. e-mail: MTAllison@dcpmidstream.com						
b	A. R. O. Address: 1625 W Marland Street, Hobbs, NM 88240							
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): None							
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.): None							
a	Address of Parent Company: None							
5	Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are owned, wholly or in part, by the company to be permitted.): None							
6	Telephone numbers & names of the owners' agents and site contact	ts familiar with plant operations: None						

7

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:20.6 kilometers from Texas.

#### **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:**

- 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.
- 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):**

☐ CD/DVD attached to paper application	
☐ secure electronic transfer. Air Permit Co	ntact 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 <u>summary report only</u> 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)]:

- 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 Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) <sup>4</sup>	Replacing Unit No.
2	Amine Plant Flare East	Flare King	N/A	N/A	1.2 MMBtu/hr	1.2 MMBtu/hr	2005 2005	N/A 2	31000205	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
4A	ESD Flare	John Zink	N/A	N/A	3.2 MMBtu/hr	3.2 MMBtu/hr	2006 2008	N/A 4A	31000209	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
6	2SLB RICE	Clark	TLA-6	73779	2000 HP	2000 HP	1974 or before 1974	N/A 6	20200252	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	2SLB	N/A
7	2SLB RICE	Clark	TLA-6	73780	2000 HP	2000 HP	1974 or before 1974	N/A 7	20200252	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	2SLB	N/A
8	2SLB RICE	Clark	HBA-6	36288	1267 HP	1267 HP	1951 1954	N/A 8	20200252	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	2SLB	N/A
9	2SLB RICE	Clark	HBA-6	736290	1267 HP	1267 HP	1951 1954	N/A 9	20200252	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	2SLB	N/A
10	2SLB RICE	Clark	HBA-6	36289	1267 HP	1267 HP	1951 1954	N/A 10	20200252	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	2SLB	N/A
11	2SLB RICE	Clark	HBA-6	36303	1267 HP	1267 HP	1951 1954	N/A 11	20200252	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	2SLB	N/A
Note rego	urding Units 6-11: The	se units will be	dual-servi	ce (inlet / resid	due compres	sion). These	units will operate	under eithe	r scenario A and B	3. These scenarios are described in Section 15	of this application	on.
28 & C-28	Turbine	Solar	T-60	TC12227	63.4 MMBtu/hr	63.4 MMBtu/hr	2011 2012	N/A 28	20200201	✓ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
29	Turbine	Solar	T-70	DCC0050	77.6 MMBtu/hr	77.6 MMBtu/hr	1995 1995	N/A 29	20200201	☑ Existing (unchanged)     □ To be Removed       □ New/Additional     □ Replacement Unit       □ To Be Modified     □ To be Replaced	N/A	N/A
30	Turbine	Solar	T-70	TC95593	73.95 MMBtu/hr	73.95 MMBtu/hr	1995 1995	N/A 30	20200201	☑ Existing (unchanged)     □ To be Removed       □ New/Additional     □ Replacement Unit       □ To Be Modified     □ To be Replaced	N/A	N/A
31	Turbine	Solar	T-4700	3000724	36.8 MMBtu/hr	36.8 MMBtu/hr	1995 1995	N/A 31	20200201	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
32B	Turbine	Solar	T-4000	CM79453	36.2 MMBtu/hr	36.2 MMBtu/hr	1979 1995	N/A 32B	20200201	☑ Existing (unchanged) □ To be Removed     □ New/Additional □ Replacement Unit     □ To Be Modified □ To be Replaced	N/A	N/A
34	Regenerator Heater	Heatec	Heatec	H191-095	15 MMBtu/hr	15 MMBtu/hr	1991 1995	N/A 34	31000404	☑ Existing (unchanged) □ To be Removed     □ New/Additional □ Replacement Unit     □ To Be Modified □ To be Replaced	N/A	N/A

					Manufact- urer's Rated	Requested Permitted	Date of Manufacture <sup>2</sup>	Controlled by Unit #			RICE Ignition	
Unit Number <sup>1</sup>	Source Description	Make	Model #	Serial #	Capacity <sup>3</sup> (Specify Units)	Capacity <sup>3</sup> (Specify Units)	Date of Construction/ Reconstruction <sup>2</sup>	Emissions vented to Stack #	Source Classi- fication Code (SCC)	For Each Piece of Equipment, Check One	Type (CI, SI, 4SLB, 4SRB, 2SLB) <sup>4</sup>	Replacing Unit No.
36	Boiler	Rentech/Zinc	N/A	9049307	99 MMBtu/hr	99 MMBtu/hr	2005 2006	N/A 36	31000404	☑ Existing (unchanged)     □ To be Removed       □ New/Additional     □ Replacement Unit       □ To Be Modified     □ To be Replaced	N/A	N/A
37	Boiler	Rentech/Zinc	N/A	9049303	99 MMBtu/hr	99 MMBtu/hr	2012 2010	N/A 37	31000404	☑ Existing (unchanged)       □ To be Removed         □ New/Additional       □ Replacement Unit         □ To Be Modified       □ To be Replaced	N/A	N/A
FUG	Fugitive Equipment Leak Emissions	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A FUG	31000306	✓ Existing (unchanged)       □ To be Removed         □ New/Additional       □ Replacement Unit         □ To Be Modified       □ To be Replaced	N/A	N/A
TK-2	Storage Tank - Gasoline	N/A	N/A	N/A	11.9 bbl	11.9 bbl	1985 2005	N/A TK-2	40600061	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
AGI Flare	AGI Flare	Flare King	Flare King	N/A	1.2 MMscf/d	1.2 MMscf/d	2009 2009	N/A 50	31000209	✓ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
AGI	AGI Well	N/A	N/A	N/A	7 MMscf/d	7 MMscf/d	2009 2009	N/A 50	N/A	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
AM-10	Amine Unit	N/A	N/A	N/A	225 MMscf/d	225 MMscf/d	N/A N/A	2, AGI 2, AGI Flare	31000305	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
DH-10	Glycol Dehydrator	N/A	N/A	N/A	27 MMscf/d	27 MMscf/d	2012 6/1/2012	N/A 4a	31000303	✓ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
CT-1	South Cooling Tower	N/A	N/A	N/A	12,800 gpm	12,800 gpm	Unknown	N/A CT-1	38500101	✓ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
CT-2	North Cooling Tower	N/A	N/A	N/A	4,090 gpm	4,090 gpm	Unknown	N/A CT-2	38500101	✓ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
TK-	Seven Condensate Tanks controlled by	N/A	N/A	N/A	(1-5), 400	750 bbl x 5 (1-5), 400	2012	VRU	40400321	✓ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit	N/A	N/A
VRU <sup>5</sup>	common VRU	17/11	14/11	1771	bbl (6), 210 bbl (7)	bbl (6), 210 bbl (7)	TBD	TK-VRU	10100321	☐ To Be Modified ☐ To be Replaced	14/11	1771
TK- VRUTMP	Two Condensate Tanks controlled by common VRU. (Previously listed as	N/A	N/A	N/A	1500 bbl x 2	1500 bbl x 2	1954 1996	VRU-TMP  TK- VRUTMP	40400321	✓ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
LOAD- STAB	Stabilized Condensate Loading (from TK- VRUTMP)	N/A	N/A	N/A	27,594,000 gal/yr	27,594,000 gal/yr	N/A N/A	VRU TK-VRU	40600243	□ Existing (unchanged) □ To be Removed ☑ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A
LOAD- UNS	Unstabilized Condensate Loading (from TK-VRU)	N/A	N/A	N/A	50,194,800 gal/yr	50,194,800 gal/yr	N/A N/A	VRU-TMP  TK- VRUTMP	40600243	□ Existing (unchanged) □ To be Removed ☑ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced	N/A	N/A

					Manufact- urer's Rated	4	Date of Manufacture <sup>2</sup>	Controlled by Unit #			RICE Ignition	
Uni Numb	Source Description	Make	Model #	Serial #	Capacity <sup>3</sup> (Specify Units)	Capacity <sup>3</sup> (Specify Units)	Date of Construction/ Reconstruction <sup>2</sup>	Emissions vented to Stack #	Source Classi- fication Code (SCC)	For Each Piece of Equipment, Check One	Type (CI, SI, 4SLB, 4SRB, 2SLB) <sup>4</sup>	Replacing Unit No.

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>&</sup>lt;sup>4</sup> "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 ignition

<sup>&</sup>lt;sup>5</sup> The TK-VRU units are currently permitted but have not been installed at the time of application. TK-VRU and TK-VRUTMP will not run simultaneously.

#### **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/apb/permit/apb\_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 Equipment, Check Onc
	Source Description	72411414044101	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	To the Tree of Equipment, officer one
TK-1	Firewater	Unknown	N/A	9065	Not a source of regulated pollutants	1/1/1995	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-1	riiewatei	Ulkilowii	N/A	bbls	Insignificant Activity Item #1.a	Unknown	☐ To Be Modified ☐ To be Replaced
TK-2	Firewater	Unknown	N/A	3500	Not a source of regulated pollutants	1/1/1995	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-2	rnewater	Ulkilowii	N/A	bbls	Insignificant Activity Item #1.a	Unknown	☐ To Be Modified ☐ To be Replaced
TK-3	Firewater	Unknown	N/A	3500	Not a source of regulated pollutants	1/1/1995	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-3	Thewater	Clikilowii	N/A	bbls	Insignificant Activity Item #1.a	Unknown	☐ To Be Modified ☐ To be Replaced
TK-4	Stoddard	Unknown	N/A	564	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-4	Stoddard	Clikilowii	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-5	Detergent	Unknown	N/A	225	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-3	Detergent	Clikilowii	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-6	Detergent	Unknown	N/A	300	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-0	Detergent	Clikilowii	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-7	Solvent	Unknown	N/A	300	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit
1 K-7	Solvent	Chkhown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-8	Lube Oil	Unknown	N/A	564	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit
1 K-0	Luoc On	Chkhown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-9	Ethylene Glycol	Unknown	N/A	564	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit
1K-)	Entryiene Grycor	Chkhown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-10	Lube Oil	Unknown	N/A	30	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit
1K-10	Luoc On	Chkhown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-11	Methanol	Unknown	N/A	168	20.2.72.202.B.5 NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
TK-TT	Medianoi	Chkhown	N/A	gal	Insignificant Activity Item #1.a	Unknown	☐ To Be Modified ☐ To be Replaced
TK-12	Sodium Hypochlorite	Unknown	N/A	479	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit
111-12	Southin Hypochiorite	Olikilowii	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-13	Sodium Hypochlorite	Unknown	N/A	479	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) □ To be Removed □ New/Additional □ Replacement Unit
11X-13	Socium Hypochiorite	Chinown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-14	Chemtreat BL-4830	Unknown	N/A	500	20.2.72.202.B.5 NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
113-1-4	Chemical DL-4030	Chkhowh	N/A	gal	Insignificant Activity Item #1.a	Unknown	☐ To Be Modified ☐ To be Replaced

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 Equipment, Check Onc
Omt Number	Source Description	Manufacturer	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	For Each Fiece of Equipment, Check Onc
TK-15	93% Sulfuric Acid	I Indonesia	N/A	7000	20.2.72.202.B.5 NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-13	95% Sulturic Acid	Unknown	N/A	gal	Insignificant Activity Item #1.a	Unknown	□ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced
TK-16	Chemtreat BL-4830	Unknown	N/A	500	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-10	Chemiteat BL-4650	Ulkilowii	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-17	Chemtreat BL-1258	Unknown	N/A	550	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-1/	Chemiteat BL-1236	Ulkilowii	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-18	Lube Oil	Unknown	N/A	55	20.2.72.202.B.5 NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-10	Luoe OII	Ulkilowii	N/A	gal	Insignificant Activity Item #1.a	Unknown	☐ To Be Modified ☐ To be Replaced
TK-19	Lube Oil	Unknown	N/A	55	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 W-13	Luve OII	UIIKIIOWII	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TI 20	Ethniana Chasal	I I alan a a a a	N/A	1128	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
TK-20	Ethylene Glycol	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TW 21	DI 4250	I I alan a a a a	N/A	500	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed
TK-21	BL-4350	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TIV 22	DI 1550	TT-1	N/A	500	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed
TK-22	BL-1558	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TIV 22	Window	TT-1	N/A	500	Not a source of regulated pollutants	Unknown	☑ Existing (unchanged) ☐ To be Removed
TK-23	Water	Unknown	N/A	bbls	Insignificant Activity Item #1.a	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TIV 04	Window	TT-1	N/A	500	Not a source of regulated pollutants	Unknown	☑ Existing (unchanged) ☐ To be Removed
TK-24	Water	Unknown	N/A	bbls	Insignificant Activity Item #1.a	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TIV 05	C. 1' II1'1-	T T 1	N/A	220	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed
TK-25	Sodium Hydroxide	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TIV 26	No.100 EC15290	I Indonesia	N/A	479	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed
TK-26	Nalco EC15380	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	<ul> <li>□ New/Additional</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
TK-27	Luba Oil	I Indonesia	N/A	55	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-2/	Lube Oil	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-28	Lube Oil	Unknown	N/A	55	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 N-20	Lube OII	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	<ul> <li>□ New/Additional</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
TK-29	Nalco 1538A	Unknown	N/A	718	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 N-29	INAICO 1338A	UIIKIIOWII	N/A	bbl	Insignificant Activity Item #5	Unknown	<ul> <li>□ New/Additional</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
TK-30	Cymonov, Danta a al-	I Inles areas	N/A	300	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-30	Synergy Pertosolv	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TV 21	Luba Oil	I I a language	N/A	564	20.2.72.202.B.2.a NMAC	unknown	☐ Existing (unchanged) ☐ To be Removed
TK-31	Lube Oil	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced

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Linit Number	Course 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 Biose of Equipment Check One
Unit Number	Source Description	Manufacturer	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	For Each Piece of Equipment, Check Onc
TK-32	C	Y Y 1	N/A	525	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed
1K-32	Synergy Pertosolv	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-33	Company Dantagalo	I I wales on se	N/A	525	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed
1K-33	Synergy Pertosolv	Unknown	N/A	bbl	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-34	Cymtron	Unknown	N/A	55	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-34	Gyptron	Unknown	N/A	bbl	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-35	Gyptron	Unknown	N/A	55	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-33	Сурион	Ulikilowii	N/A	bbl	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-36	Methanol	Unknown	N/A	564	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-30	Methanor	Ulikilowii	N/A	bbl	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-37	Lube Oil	Unknown	N/A	752	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-3/	Lube Off	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-38	Methanol	Unknown	N/A	1128	20.2.72.202.B.5 NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-30	Methanor	Ulikilowii	N/A	gal	Insignificant Activity Item #1.a	Unknown	☐ To Be Modified ☐ To be Replaced
TV 20	Defease	I Indonesia	N/A	55	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
TK-39	Defoam	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-40	North Aming Touls	I I wales a seem	N/A	5000	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed
1 K-40	North Amine Tank	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-41	South Amine Tank	Unknown	N/A	5000	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-41	South Annie Tank	Unknown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-42	Clysol	Unknown	N/A	1128	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) □ To be Removed     □ New/Additional □ Replacement Unit
1 K-42	Glycol	Unknown	N/A	bbls	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-43	West Amine Surge Tank	Unknown	N/A	5000	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1K-43	west Annie Surge Tank	Ulikilowii	N/A	bbls	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-44	East Amine Surge Tank	Unknown	N/A	5000	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 K-44	East Allille Surge Talik	Ulikilowii	N/A	bbls	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-45	Lube Oil	Unknown	N/A	55	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
1 IX-+J	Luoc OII	Challown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-46	Detergent	Unknown	N/A	300	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
112-40	Detergent	Challown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-47	Lube Oil	Unknown	N/A	752	20.2.72.202.B.2.a NMAC	Unknown	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
111-4/	Luoc OII	Challown	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced
TK-48	Lube Oil	Unknown	N/A	752	20.2.72.202.B.2.a NMAC	Unknown	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit
117-40	Lube OII	CHKHOWH	N/A	gal	Insignificant Activity Item #5	Unknown	☐ To Be Modified ☐ To be Replaced

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Serial No.   Capacity Units   Insignificant Activity citation (e.g. IA List Item #1.a)   Date of Installation /Construction <sup>2</sup>	Check Onc
TK-49 Lube Oil Unknown    N/A   gal   Insignificant Activity Item #5   Unknown   New/Additional   Replacen   To be Replacen	
N/A gal   Insignificant Activity Item #5   Unknown   To Be Modified   To be Ref   TK-50   Clark Lube Oil Drain Tk   Unknown   To Be Modified   To be Ref   N/A   S64   20.2.72.202.B.2.a NMAC   Unknown   Existing (unchanged)   To be Ref   N/A   S64   20.2.72.202.B.2.a NMAC   Unknown   To Be Modified   To be Ref   N/A   S64   20.2.72.202.B.2.a NMAC   Unknown   To Be Modified   To be Ref   N/A   S64   20.2.72.202.B.2.a NMAC   Unknown   To Be Modified   To be Ref   N/A   S64   20.2.72.202.B.2.a NMAC   Unknown   New/Additional   Replacen   N/A   S64   Not a source of regulated pollutants   Unknown   New/Additional   To Be Modified   To be Ref   N/A   S64   Not a source of regulated pollutants   Unknown   New/Additional   To Be Modified   To be Ref   N/A   S64   Not a source of regulated pollutants   Unknown   To Be Modified   To be Ref   N/A   S64   Not a source of regulated pollutants   Unknown   To Be Modified   To be Ref   N/A   S64   Not a source of regulated pollutants   Unknown   To Be Modified   To be Ref   N/A   S64   Not a source of regulated pollutants   Unknown   To Be Modified   To be Ref   N/A   S64	
TK-50 Clark Lube Oil Drain Tk Unknown	
N/A gal   Insignificant Activity Item #5   Unknown   To Be Modified   To be Replacen	
TK-51 Clark Lube Oil Drain Tk Unknown N/A gal Insignificant Activity Item #5 Unknown New/Additional Replacen  TK-52 Clark Jacket Water Drain Tk Unknown  TK-53 Clark Jacket Water Feed Tk  TK-54 Lube Oil Unknown  TK-54 Lube Oil Unknown  Unknown  N/A gal Insignificant Activity Item #1.a Unknown  N/	
N/A gal Insignificant Activity Item #5 Unknown	
TK-52 Clark Jacket Water Drain Tk Unknown    New/Additional   Replacen	
N/A gal Insignificant Activity Item #1.a Unknown	
TK-53 Clark Jacket Water Feed Tk Unknown  N/A gal Insignificant Activity Item #1.a Unknown  N/A 564 20.2.72.202.B.2.a NMAC Unknown    New/Additional   Replacen   Replacen   To be Replacen   Tk-54   Lube Oil Unknown   Mew/Additional   Replacen   Replacen   To be Replacen   To be Replacen   Tk-54   Replacen	
N/A gal Insignificant Activity Item #1.a Unknown	
TK-54 Lube Oil Unknown Superior Control of the Cont	
N/A gal Insignificant Activity Item #5 Unknown   To Be Modified  To be Req	
TK-55 Lube Oil Unknown N/A 564 20.2.72.202.B.2.a NMAC Unknown Existing (unchanged)  To be Re	
N/A gal Insignificant Activity Item #5 Unknown To Be Modified To be Rep	
TK-56 Firewater Pump Diesel Tk Unknown Unknown Unknown Unknown Unknown Unknown Unknown Unknown Unknown	
N/A gal Insignificant Activity Item #5 Unknown To Be Modified To be Rep	
TK-57 Water Unknown N/A 224 20.2.72.202.B.5 NMAC Unknown Existing (unchanged) To be Re	
N/A gal Insignificant Activity Item #1.a Unknown To Be Modified To be Rep	
Lide 500 Not a source of regulated pollutants N/A Existing (unchanged)  To be Rer	
1 9095 bbl Insignificant Activity Item #1.a Unknown To Be Modified To be Rep	
TK-GBW2 Gunbarrel Water Tank Lide Lide 500 Not a source of regulated pollutants N/A Existing (unchanged)	
1 R-GB w 2 Guinoariei water Tank Lide 1 9098 bbl Insignificant Activity Item #1.a Unknown	
TK-GBW3 Gunbarrel Water Tank Lide N/A 500 Not a source of regulated pollutants N/A Existing (unchanged)  To be Rer	
N/A bbl Insignificant Activity Item #1.a Unknown	
Unpaved Haul Roads HAUL (associated with LOAD- N/A N/A (Continuous)  N/A 8760 20.2.72.202.B.5 NMAC N/A Existing (unchanged)  To be Ren  N/A  N/A Replacement  N/A  N/A Replacement  N/A  N/A  N/A  N/A  N/A  N/A  N/A  N/	
STAB and LOAD-UNS)  N/A trips/yr Insignificant Activity Item #1.a Unknown   To Be Modified  To be Rep	ent Unit

<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.

#### **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
2	Amine Plant Flare East	2005	H <sub>2</sub> S, VOC	Amine Treating, DH-10	~ 98%	Eng. Judgement
4A	ESD Flare	2008	H <sub>2</sub> S, VOC	All Units	~ 98%	Eng. Judgement
AGI	Acid Gas Injection (AGI) Well	12/1/2009	H <sub>2</sub> S, VOC	Amine Treating	1	Eng. Judgement
AGI Flare	AGI Flare	12/1/2009	H <sub>2</sub> S, VOC	AGI	~ 98%	Eng. Judgement
VRU	Vapor Recovery Unit (VRU)	TBD	VOC	TK-VRU	95%	Eng. Judgement
VRU-TMP	Vapor Recovery Unit (VRU)	5/1/2011	VOC	TK-VRUTMP	95%	Eng. Judgement

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 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).

II:4 No	t No.   NOx   CO		V	OC	S	Ox	TS	$SP^1$	PM	I10 <sup>1</sup>	PM	$[2.5^1]$	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
Totals																		

<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 TSP unless TSP is set equal to PM10 and PM2.5.

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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	SO	Ox	TS	$P^{1,2}$	PM	[10 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н	$_{2}S$	Le	ead
Omt 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
2	0.085	0.37	0.39	1.69	0.027	0.12	0.0083	0.04	1	-	-	-	-	-	-	-	-	-
4A	0.23	1.00	1.05	4.58	0.17	0.80	0.023	0.10	-	-	-	-	-	-	-	-	-	-
6	39.29		19.84		3.05		0.010		-	-	0.86		0.86		-	-	-	-
7	39.29	566.08	19.84	283.08	3.05	60.77	0.010	0.12	-	-	0.86	10.01	0.86	10.01	-	-	-	-
8,9,10, or 11	47.49		23.52		6.45	1	0.0070		-	-	0.57		0.57		-	-	-	-
28	3.47	15.20	3.52	15.42	2.01	8.82	0.91	4.01	-	-	1.33	5.83	1.33	5.83	-	-	-	-
29	11.82	51.78	9.47	41.48	0.33	1.42	0.26	1.16	-	-	0.51	2.24	0.51	2.24	-	-	-	-
30	11.26	49.32	9.02	39.51	0.31	1.36	0.25	1.10	-	-	0.49	2.14	0.49	2.14	-	-	-	-
31	26.03	114.01	4.95	21.60	0.35	1.53	0.13	0.55	-	-	0.24	1.06	0.24	1.06	-	-	-	-
32B	23.72	103.88	4.38	19.19	2.50	10.94	0.12	0.54	-	-	0.24	1.05	0.24	1.05	-	-	-	-
34	1.67	7.30	1.40	6.13	0.092	0.40	0.010	0.044	-	-	0.13	0.044	0.13	0.044	-	-	-	-
36	5.53	24.21	9.29	40.68	0.61	2.66	0.066	0.29	-	-	0.84	3.68	0.84	3.68	-	-	-	-
37	5.53	24.21	9.29	40.68	0.61	2.66	0.066	0.29	-	-	0.84	3.68	0.84	3.68	-	-	-	-
TK-2	-	-	-	-	0.16	0.70	-	-	-	-	-	-	-	-	-	-	-	-
AGI Flare	0.085	0.37	0.39	1.69	0.027	0.12	0.0083	0.036	-	-	-	-	-	-	-	-	-	-
AM-10	-	-	-	-	-	-	-	-	1	1	-	-	-	-	1	-	-	-
DH-10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TK-VRU	1	-	-	-	27.54	6.03	1	-	ı	-	-	-	-	-	-	-	-	-
TK-VRUTMP <sup>3</sup>	-	-	-	-	24.56	5.38	-	-	-	-	-	-	-	-	-	-	-	-
CT-1	-	-	-	-	-	-	-	-	-	-	1.92	8.42	0.0078	0.034	-	-	-	-
CT-2	-	-	-	-	-	-	-	-	-	-	0.61	2.69	0.0025	0.011	-	-	-	-
FUG	-	-	-	-	17.74	77.01	-	-	-	-	-	-	-	-	0.11	0.48	-	-
LOAD-STAB	-	-	-	-	0.67	2.95	-	-	-	-	-	-	-	-	-	-	-	-
LOAD-UNS	-	-	-	-	0.0035	#######	-	-	-	-	-	-	-	-	-	-	-	-
Totals	215.48	957.74	116.34	515.72	90.27	178.30	1.89	8.27	-	-	9.44	40.85	6.92	29.79	0.11	0.48	-	-

<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 TSP unless TSP is set equal to PM10 and PM2.5.

<sup>&</sup>lt;sup>2</sup> TSP not included because the the NM TSP standard was repealed on 11/30/2018.

<sup>&</sup>lt;sup>3</sup> Unit TK-VRUTMP will not run while unit TK-VRU is running. Emissions from unit TK-VRUTMP are shown here but are not included in the totals.

#### 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.	NO	Ox	C	O	VO	C	SO	X	TS	$\mathbf{P}^{2,3}$	PM	$10^2$	PM	$12.5^2$	Н	<sub>2</sub> S	L	ead
Umt 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
		-		-		Start-	up, Shutdow	n & Maint	enance Fl	aring	•		-		:	-		
2	14.90	0.51	80.60	3.10	1.60	0.0090	7751.0	46.0	-	-	-	-	-	-	84.0	0.48	-	-
4A	287.80	3.30	1564.0	19.40	861.80	6.60	2148.0	18.90	-	-	-	-	-	-	23.0	0.20	-	-
AGI Flare	17.90	0.34	96.60	42.30	1.90	0.00080	9301.0	4.06	-	-	-	-	-	-	101.0	0.043	-	-
						Start-ı	up, Shutdow	n & Maint	enance Ve	enting								
SSM Venting	-	-	-	-	5,391.12	36.26	-	-	-	-	-	-	-	-	62.59	0.31	-	-
							Malfuction	Flaring &	Venting									
Malfuction <sup>4</sup>	287.65	10.00	1565.15	10.00	3029.49	10.00	9301.45	10.00	-	-	-	-	-	-	100.83	10.00	-	-
																		4
Total SSM &																		
Malfuction	320.60	14.15	1,741.20	74.80	6,021.35	52.87	19,200.00	78.96	-	-	-	-	-	-	270.59	11.04	-	-

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 TSP unless TSP is set equal to PM10 and PM2.5.

<sup>&</sup>lt;sup>3</sup> TSP not included because the the NM TSP standard was repealed on 11/30/2018.

<sup>&</sup>lt;sup>4</sup> Hourly emission rate shown for informational purposes only; emissions were calculated assuming each activity lasts 1 hour.

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

☑ 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 the "-" symbol and on significant figures.

	Serving Unit	N	Ox	C	O	V	ЭС	SO	Ox	TS	SP	PM	<b>I</b> 10	PM	2.5	□ H <sub>2</sub> S or	r □ Lead
Stack No.	Number(s) from Table 2-A	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr										
	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)	<b>(F)</b>	(acfs)	(dscfs)	Volume (%)	(ft/sec)	Diameter (ft)
2	2	V	No	222.0	1832.0	131.2	-		65.6	2.0
4A	4A	V	No	175.0	1832.0	131.2	-	-	65.6	2.0
6	6	V	No	74.0	750.0	318.3	-	-	132.3	1.8
7	7	V	No	74.0	750.0	318.3	-	-	132.3	1.8
8	8	V	No	75.0	650.0	216.7	-	-	122.6	1.5
9	9	V	No	75.0	650.0	216.7	-	-	122.6	1.5
10	10	V	No	74.0	650.0	215.8	-	-	122.1	1.5
11	11	V	No	74.0	650.0	215.8	-	-	122.1	1.5
28	28	V	No	35.8	890.0	1787.4	-	-	154.9	3.8
29	29	V	No	44.0	858.0	1964.1	-	-	156.3	4.0
30	30	V	No	44.0	826.0	1916.4	-	-	67.8	6.0
31	31	V	No	44.0	817.0	1300.0	-	-	103.5	4.0
32B	32B	V	No	32.0	817.0	1307.7	=	=	104.1	4.0
34	34	V	No	45.0	600.0	114.1	-	-	36.3	2.0
36	36	V	No	50.0	300.0	552.2	=	=	50.0	3.8
37	37	V	No	50.0	300.0	552.2	-	-	50.0	3.8
AGI Flare	AGI Flare	V	No	210.0	1831.7	15.1	-	=	65.6	2.0

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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	7	OC.	SO	Ox	TS	$\mathbf{P}^{1,2}$	PM	I10 <sup>1</sup>	PM	$[2.5^1]$	Н	$_{2}S$	Le	ead
Omt 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
2	0.085	0.37	0.39	1.69	0.027	0.12	0.0083	0.04	-	-	-	-	-	-	-	-	-	-
4A	0.23	1.00	1.05	4.58	0.17	0.80	0.023	0.10	-	-	-	-	-	-	-	-	-	-
6	39.29		19.84		3.05		0.010		-	-	0.86		0.86		-	-	-	-
7	39.29	566.08	19.84	283.08	3.05	60.77	0.010	0.12	1	-	0.86	10.01	0.86	10.01	-	1	-	-
8,9,10, or 11	47.49		23.52		6.45		0.0070		-	-	0.57		0.57		-	-	-	-
28	3.47	15.20	3.52	15.42	2.01	8.82	0.91	4.01	-	-	1.33	5.83	1.33	5.83	-	-	-	-
29	11.82	51.78	9.47	41.48	0.33	1.42	0.26	1.16	-	-	0.51	2.24	0.51	2.24	-	-	-	-
30	11.26	49.32	9.02	39.51	0.31	1.36	0.25	1.10	1	-	0.49	2.14	0.49	2.14	-	-	-	-
31	26.03	114.01	4.95	21.60	0.35	1.53	0.13	0.55	-	-	0.24	1.06	0.24	1.06	-	-	-	-
32B	23.72	103.88	4.38	19.19	2.50	10.94	0.12	0.54	1	-	0.24	1.05	0.24	1.05	-	1	-	-
34	1.67	7.30	1.40	6.13	0.092	0.40	0.010	0.044	-	-	0.13	0.044	0.13	0.044	-	-	-	-
36	5.53	24.21	9.29	40.68	0.61	2.66	0.066	0.29	-	-	0.84	3.68	0.84	3.68	-	-	-	-
37	5.53	24.21	9.29	40.68	0.61	2.66	0.066	0.29	-	-	0.84	3.68	0.84	3.68	-	-	-	-
TK-2	-	-	-	-	0.16	0.70	-	-	-	-	-	-	-	-	-	-	-	-
AGI Flare	0.085	0.37	0.39	1.69	0.027	0.12	0.0083	0.036	-	-	-	-	-	-	-	-	-	-
AM-10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
DH-10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TK-VRU	-	-	-	-	27.54	6.03	-	-	-	-	-	-	-	-	-	-	-	-
TK-VRUTMP <sup>3</sup>	-	-	-	-	24.56	5.38	-	-	-	-	-	-	-	-	-	-	-	-
CT-1	-	-	-	-	-	-	-	-	-	-	1.92	8.42	0.0078	0.034	-	-	-	-
CT-2	-	-	-	-	-	-	-	-	-	-	0.61	2.69	0.0025	0.011	-	-	-	-
FUG	-	-	-	-	17.74	77.01	-	-	-	-	-	-	-	-	0.11	0.48	-	-
LOAD-STAB	-	-	-	-	0.67	2.95	-	-	-	-	-	-	-	-	-	-	_	-
LOAD-UNS	-	-	-	-	0.0035	5.77E-04	-	-	-	-	-	-	-	-	-	-	-	-
	_		_	_	_		_	_	_					_		_		
Totals	215.48	957.74	116.34	515.72	90.27	178.30	1.89	8.27	-	-	9.44	40.85	6.92	29.79	0.11	0.48	-	-

<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 TSP unless TSP is set equal to PM10 and PM2.5.

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<sup>&</sup>lt;sup>2</sup> TSP not included because the the NM TSP standard was repealed on 11/30/2018.

<sup>&</sup>lt;sup>3</sup> Unit TK-VRUTMP will not run while unit TK-VRU is running. Emissions from unit TK-VRUTMP are shown here but are not included in the totals.

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	y 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
2	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	1.2 Mscf	10.2 MMscf	5 grains/100 scf	-
4A	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	3.2 Mscf	28.0 MMscf	5 grains/100 scf	-
6	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	19.7 Mscf	172.5 MMscf	5 grains/100 scf	-
7	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	19.7 Mscf	172.5 MMscf	5 grains/100 scf	-
8,9,10, or 11	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	13.2 Mscf	115.4 MMscf	5 grains/100 scf	-
28	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	64.1 Mscf	561.2 MMscf	5 grains/100 scf	-
29	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	82.7 Mscf	724.2 MMscf	5 grains/100 scf	-
30	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	78.7 Mscf	689.8 MMscf	5 grains/100 scf	-
31	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	40.9 Mscf	358.2 MMscf	5 grains/100 scf	-
32B	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	40.2 Mscf	352.4 MMscf	5 grains/100 scf	-
34	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	16.7 Mscf	146.0 MMscf	5 grains/100 scf	-
36	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	110.6 Mscf	968.5 MMscf	5 grains/100 scf	-
37	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	110.6 Mscf	968.5 MMscf	5 grains/100 scf	-
AGI Flare	Natural Gas	Pipeline Quality Natural Gas	900 Btu/scf	1.2 Mscf	10.2 MMscf	5 grains/100 scf	-

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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 package.

					Vapor	Average Stor	age Conditions	Max Storage 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)	
TK-2	40600061	Gasoline (fuel)	Mixed C8+ hydrocarbons	5.6	62	76	9.34	93	12.45	
TK-VRU1	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	
TK-VRU2	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	
TK-VRU3	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	
TK-VRU4	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	
TK-VRU5	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	
TK-VRUTMP1	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	
TK-VRUTMP2	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	
TK-VRU6	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	
TK-VRU7	40400321	Gasoline (RVP 10)	Mixed C8+ hydrocarbons	5.6	66	63	5.52	71	6.36	

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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

Installed	(gal/yr) 3,000 27,594,000 15,768,000 6,832,800 27,594,000	(per year) 6.00 175.20 931.88 775.33 219.00
TK-VRU1         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU2         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU3         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU4         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU5         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         WH         Good           TK-VRU5         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU6         TBD         Gasoline (RVP 10)         N/A         N/A         400         64         3.6576         1.8288         WH         WH         WH         WH<	27,594,000 15,768,000 6,832,800	175.20 931.88 775.33
TK-VRU2         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU3         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU4         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU5         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU5         TBD         Gasoline (RVP 10)         N/A         N/A         400         64         3.6576         1.8288         WH         WH         WH         Good           TK-VRU7         TBD         Gasoline (RVP 10)         N/A         N/A         210         33         3.048         1.524         WH         WH         Good           TK-VRUTMP1         1996         Gasoline (RVP 10)         N/A         N/A         1,500         363         3.65         0.25         WH         WH         Good	15,768,000 6,832,800	931.88 775.33
TK-VRU3         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU4         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU5         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         WH         Good           TK-VRU6         TBD         Gasoline (RVP 10)         N/A         N/A         400         64         3.6576         1.8288         WH         WH         WH         Good           TK-VRU7         TBD         Gasoline (RVP 10)         N/A         N/A         210         33         3.048         1.524         WH         WH         Good           TK-VRUTMP1         1996         Gasoline (RVP 10)         N/A         N/A         1,500         363         3.65         0.25         WH         WH         Good	15,768,000 6,832,800	931.88 775.33
TK-VRU4         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         Good           TK-VRU5         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         WH         Good           TK-VRU6         TBD         Gasoline (RVP 10)         N/A         N/A         400         64         3.6576         1.8288         WH         WH         WH         Good           TK-VRU7         TBD         Gasoline (RVP 10)         N/A         N/A         210         33         3.048         1.524         WH         WH         WH         Good           TK-VRUTMP1         1996         Gasoline (RVP 10)         N/A         N/A         1,500         363         3.65         0.25         WH         WH         Good	15,768,000 6,832,800	931.88 775.33
TK-VRU5         TBD         Gasoline (RVP 10)         N/A         N/A         750         119         4.7         3.7         WH         WH         WH         Good           TK-VRU6         TBD         Gasoline (RVP 10)         N/A         N/A         400         64         3.6576         1.8288         WH         WH         WH         Good           TK-VRU7         TBD         Gasoline (RVP 10)         N/A         N/A         210         33         3.048         1.524         WH         WH         WH         Good           TK-VRUTMP1         1996         Gasoline (RVP 10)         N/A         N/A         1,500         363         3.65         0.25         WH         WH         Good	6,832,800	775.33
TK-VRU6         TBD         Gasoline (RVP 10)         N/A         N/A         400         64         3.6576         1.8288         WH         WH         Good           TK-VRU7         TBD         Gasoline (RVP 10)         N/A         N/A         210         33         3.048         1.524         WH         WH         WH         Good           TK-VRUTMP1         1996         Gasoline (RVP 10)         N/A         N/A         1,500         363         3.65         0.25         WH         WH         Good	6,832,800	775.33
TK-VRU7         TBD         Gasoline (RVP 10)         N/A         N/A         210         33         3.048         1.524         WH         WH         Good           TK-VRUTMP1         1996         Gasoline (RVP 10)         N/A         N/A         1,500         363         3.65         0.25         WH         WH         Good	6,832,800	775.33
TK-VRUTMP1 1996 Gasoline (RVP 10) N/A N/A 1,500 363 3.65 0.25 WH WH Good		
	27,594,000	219.00
TK-VRUTMP2 1996 Gasoline (RVP 10) N/A N/A 1,500 363 3.65 0.25 WH WH Good	27,594,000	219.00
1		

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

Roof Type	Seal Type, W	elded Tank Seal Type	Seal Type, Rive	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	j
					OT: Other (specify)	

Table 2-M: Materials Processed and Produced (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)			
Natural gas	Mixed hydrocarbons	Gas	225 MMscf/day	Natural gas	Mixed hydrocarbons	Gas	225 MMscf/day			
				Condesate	Mixed hydrocarbons and water	Liquid	5,075 bbl/day			

#### **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 - There is no CF	EM equipment at this t	facility.				

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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 - There is no PEM equipment at this facility.													

#### **Table 2-P: Greenhouse 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  $\Box$  By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

		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							
2	mass GHG	611.42	0.0012	3.65	-	-						615.07	
2	CO <sub>2</sub> e	611.42	0.36	91.29	-	-							703.07
4A	mass GHG	2,153.59	0.0042	12.86	-	-						2,166.46	
7/1	CO <sub>2</sub> e	2,153.59	1.26	321.54	-	-							2,476.40
6	mass GHG	10,369.98	0.020	0.20	-	-						10,370.19	
v	CO <sub>2</sub> e	10,369.98	5.83	4.89	-	-							10,380.69
7	mass GHG	10,369.98	0.020	0.20	-	-						10,370.19	
,	CO <sub>2</sub> e	10,369.98	5.83	4.89	-	-							10,380.69
8, 9, 10,	mass GHG	6,933.34	0.013	0.13	-	-						6,933.49	
or 11	CO <sub>2</sub> e	6,933.34	3.90	3.27	-	-							6,940.51
28	mass GHG	33,718.89	0.064	0.64	-	-						33,719.59	
20	CO <sub>2</sub> e	33,718.89	18.95	15.90	-	-							33,753.74
29	mass GHG	43,513.05	0.082	0.82	-	-						43,513.95	
29	CO <sub>2</sub> e	43,513.05	24.46	20.52	-	-							43,558.02
30	mass GHG	41,446.86	0.078	0.78	-	-						41,447.72	
30	CO <sub>2</sub> e	41,446.86	23.30	19.54	-	-							41,489.70
31	mass GHG	21,521.01	0.041	0.41	-	-						21,521.45	
31	CO <sub>2</sub> e	21,521.01	12.10	10.15	-	-							21,543.25
32B	mass GHG	21,174.94	0.040	0.40	-	-						21,175.38	
3213	CO <sub>2</sub> e	21,174.94	11.90	9.98	-	-							21,196.83
34	mass GHG	8,771.82	0.017	0.17	-	-						8,772.00	
34	CO <sub>2</sub> e	8,771.82	4.93	4.14	-	-							8,780.89
36	mass GHG	58,186.62	0.11	1.10	-	-						58,187.83	
30	CO <sub>2</sub> e	58,186.62	32.70	27.44	-	-							58,246.76
37	mass GHG	58,186.62	0.11	1.10	-	-						58,187.83	
31	CO <sub>2</sub> e	58,186.62	32.70	27.44	-	-							58,246.76
AGI	mass GHG	611.42	0.0012	3.65	-	-						615.07	
Flare	CO <sub>2</sub> e	611.42	0.36	91.29	-	-							703.07
Fug	mass GHG	-	-	11.67	-	-						11.67	
rug	CO2e	-	-	291.78	-	-							291.78
SSM	mass GHG	4,525.91	1.0E-04	31.48	-	-						4,557.39	
55141	CO <sub>2</sub> e	4,525.91	0.030	787.05	-	-					<u> </u>		5,312.98
Total	mass GHG	322,095.44	0.60	69.24								322,165.28	
	CO <sub>2</sub> e	322,095.44	178.60	1,731.09		in Table A 1 of 40				a confirm GWD			324,005.13

<sup>&</sup>lt;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.

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<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.

### **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.

DCP Operating Company, LP is submitting this application and accompanying material pursuant to 20.2.72.219.D(1)(a) NMAC to apply for a significant revision to the existing NSR minor source permit for the Linam Ranch Gas Plant (Linam). Linam is a natural gas processing plant owned and is located 7 miles west of Hobbs, New Mexico in Lea County. The facility removes hydrogen sulfide, water and carbon dioxide from field natural gas and separates natural gas liquids from the field natural gas stream. The facility is currently permitted under NSR permit 0039-M8R3 and Title V permit P094-R2.

The purpose of this significant revision is to allow for stabilized (Unit LOAD-STAB) and unstabilized (Unit LOAD-UNS) truck loading emissions and associated haul road (Unit HAUL) emissions.

Unstabilized and stabilized condensate loading is currently authorized during emergency events under NSR Permit Condition A203D. However, this permit application seeks to authorized loading under normal operating conditions. While DCP does not anticipate that loading emissions will be vented to the atmosphere, as they are collected by Units VRU and VRU-TMP, DCP seeks to conservatively authorized loading emissions with a 95% collection efficiency (for stabilized condensate loading), and pressurized hose disconnects (for unstabilized loading). Condition A203 shall be updated to reflect these requests.

As the potential to emit (PTE) of the haul road will be less than 0.5 tpy, they will be exempt pursuant to 20.2.72.202.B(5) NMAC.

Finally, total facility-wide emissions have been represented in previous permit applications such that emission from the stabilized and unstabilized condensate tanks (Units TK-VRU and TK-VRUTMP) will not occur simultaneously as the VRU collecting vapors from these units will not be shutdown at the same time. Condition A203 shall be updated to reflect this operation description.

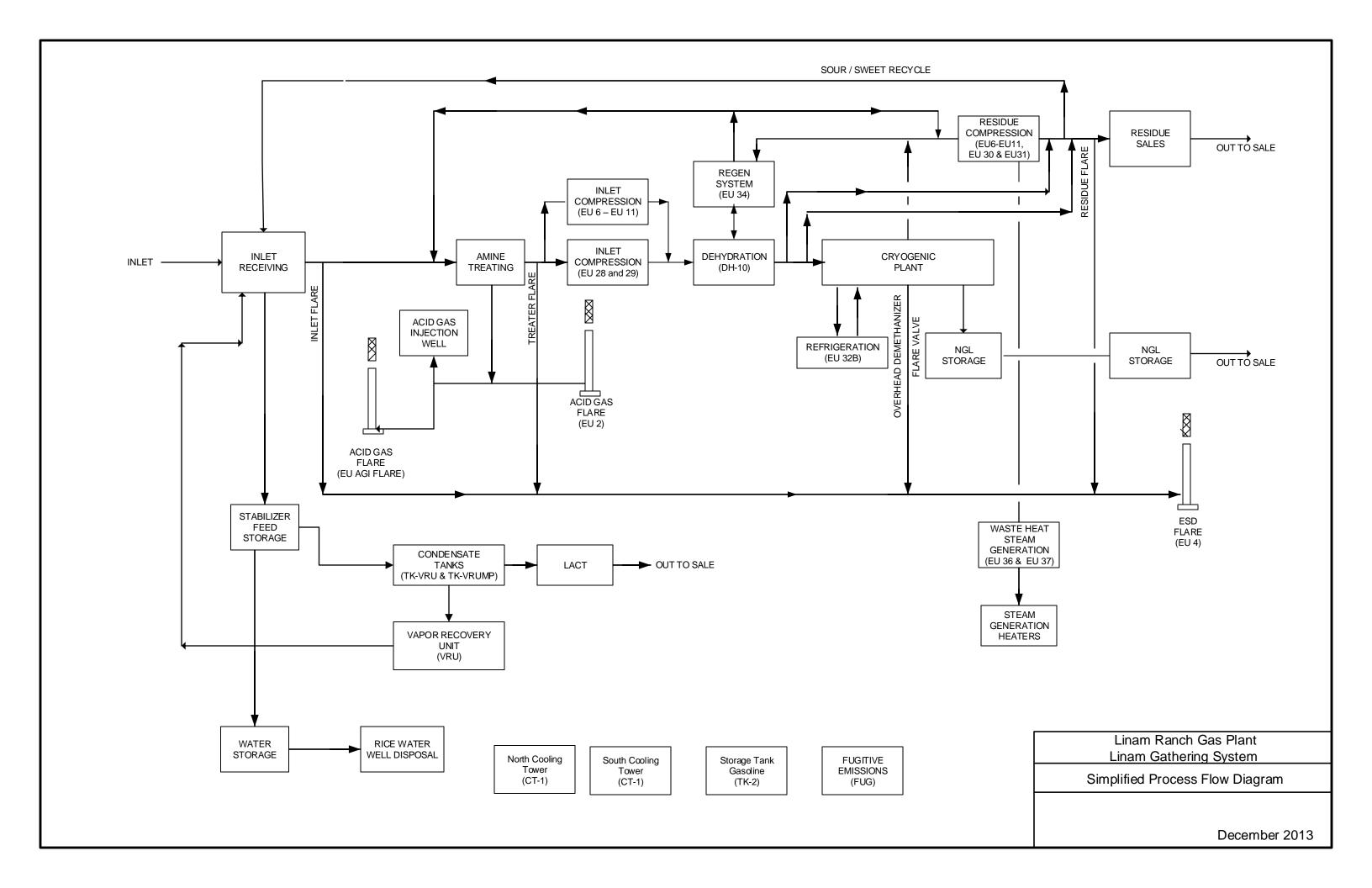
### **Section 4**

#### **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.

\_\_\_\_\_

A process flow sheet is included in this section.



### **Section 5**

#### Plot Plan Drawn To Scale

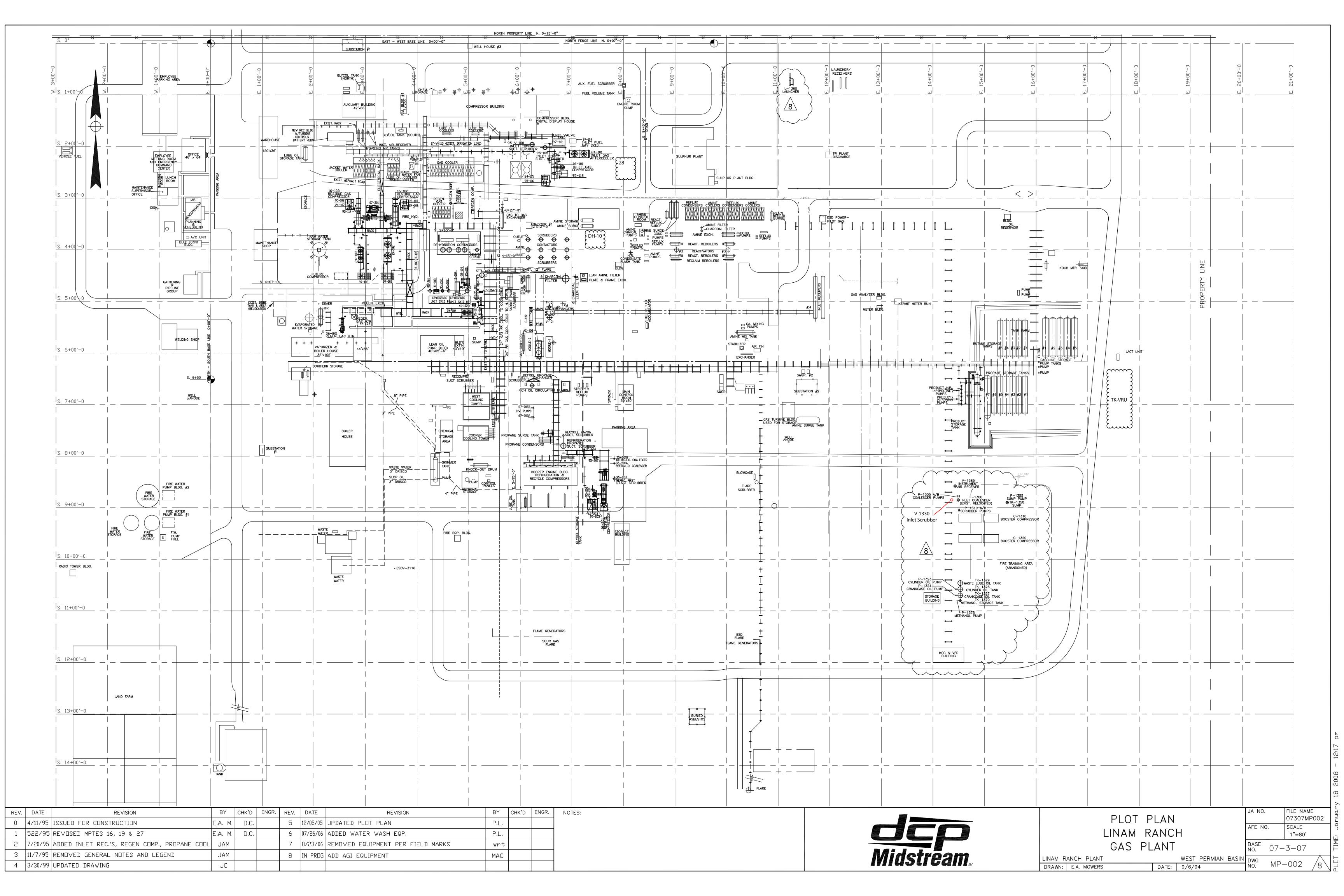
\_\_\_\_\_

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.

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

A plot plan is included in this section.

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## **Section 6**

### **All Calculations**

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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

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.

All calculations for existing permitted emission rates at the facility are shown in this section for convenience purposes.

#### Paved and Unpaved Haul Road Emissions (Unit HAUL)

A single haul road with paved and unpaved segments will be used to truck out condensate at this facility. Paved and unpaved haul road emissions were calculated using AP-42 Sections 13.2.1 and 12.2.2, respectively. As the condensate throughput will become a federally enforceable limit, this is an appropriate method to calculate the PTE of the unpaved haul road. As the PTE of the haul road will be less than 0.5 tpy, this activity will be exempt pursuant to 20.2.72.202.B(5) NMAC.

#### **Stabilized Condensate Loading (Unit LOAD-STAB)**

This application seeks to authorize 1080 bbl/day of stabilized condensate loading from tanks (TK-VRUTMP) is being requested. Emissions associated with this loading is calculated using a stabilized condensate liquid analysis and BR&E ProMax. Loading emissions will be controlled by the existing vapor recovery unit (Unit VRU-TMP). While DCP does not intend to load stabilized condensate during VRU downtime, a vapor collection efficiency of 95% is conservatively assumed.

#### **Unstabilized Condensate Loading (Unit LOAD-UNS)**

Unstabilized condensate loading from pressurized tanks (Unit TK-VRU) will be loaded out using a pressurized truck. Therefore, all associated emissions will be collected by Unit VRU. The only expected emissions from this activity will be from pressurized truck hose disconnects.

## 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  $CO_2e$  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  $\Box$  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)

### **Calculation Inputs**

### Stabilized Loading Inputs (TK-VRUTMP)

Collection Eff. 95% Collection to Low Pressure Sales Line

Loads per day 6 per day Engineer Estimate

Volume per day 45,360 gal/day Number of Loads \*7560 gal/load

1,080 bbl/day gal/day / 42 bbl/gal 16,556,400 gal/yr gal/day \* 365 days/yr

Volume per year 394,200 bbl/yr bbl/day \* 365 days/yr

#### **Unstabilized Loading Inputs (TK-VRU)**

Loads per day 2 per day Engineer Estimate
Volume per day 13,699 gal/day gal/yr / 42 bbl/gal
gal/day / 42 gal/bbl

Volume per year 5,000,000 gal/yr Enforceable per NSR Permit No. 0039-M8 Condition A203.A

119,048 bbl/yr gal/yr / 42 bbl/gal

#### **Paved Haul Road Inputs**

Road Length 0.16 mi
Round Trip Length 0.32 mi
Trips per day 8 per day
Trips per year 8760 per year

#### **Unpaved Haul Road Inputs**

Road Length 0.05 mi
Round Trip Length 0.05 mi
Trips per day 8 per day
Trips per year 8760 per year

## **Stabilized Condensate Loading**

**Collection Efficiency:** 95%

Component	lb/hr	tpy
Water	0.00E+00	0.00E+00
Hydrogen Sulfide	0.00E+00	0.00E+00
Carbon Dioxide	1.51E-03	6.63E-03
Nitrogen	3.27E-03	1.43E-02
Methane	5.36E-03	2.35E-02
Ethane	3.03E-02	1.33E-01
Propane	6.09E-02	2.67E-01
Isobutane	1.55E-02	6.80E-02
n-Butane	5.28E-02	2.31E-01
Isopentane	9.24E-02	4.05E-01
n-Pentane	2.37E-01	1.04E+00
n-Hexane	0.00E+00	0.00E+00
iC6	1.68E-01	7.34E-01
Heptane	3.49E-02	1.53E-01
Octane	3.33E-03	1.46E-02
Nonane	1.39E-04	6.07E-04
Benzene	7.57E-03	3.32E-02
Toluene	1.65E-03	7.24E-03
Ethylbenzene	6.33E-05	2.77E-04
m-Xylene	1.08E-04	4.71E-04
2,2,4-Trimethylpentane	0.00E+00	0.00E+00
Decanes Plus	4.10E-09	1.80E-08
Total VOC	0.67	2.95
Total HAP	0.0094	0.041

#### **Unstabilized Condensate Hose Disconnects**

Emission unit: UNS LOAD

Source Description: Host disconnect emissions from condensate loading activities (pressurized tank and truck)

#### CONDENSATE LOADING EMISSION INPUTS

Condensate transport truck load  Max Condensate Off Load  Disconnect losses per connector Disconnect losses per connector Condensate density Connectors disconnected per event Transport trucks per day Disconnect events per day Disconnect events per day Disconnect Events per day Condensate transport truck load (Bbl/truck) x Conversion factor (gallons/bbl) Engineer Estimate of Condensate Production Conservative Estimate Disconnect (cc/event) / Conversion factor (cc/gallon) Unstabilized Condensate Analysis (2/27/2020) One hoses, one connector at each hose end. Conservatively assumes a single truck could offload at both skids during 1 trip.  Max Condensate Offloaded (gal/truck) Max trucks per day Disconnect Events per day Condensate VOC wt %  Page 26%  Condensate transport truck load (Bbl/truck) x Conversion factor (gallons/bbl) Engineer Estimate of Condensate Production Conservative Estimate Disconnect (cc/event) / Conversion factor (cc/gallon) Unstabilized Condensate Analysis (2/27/2020) One hoses, one connector at each hose end. Conservatively assumes a single truck could offload at both skids during 1 trip. Max Condensate Unstabilized Condensate transport truck trips Equal to number of transport truck trips Instabilized Condensate Analysis (2/27/2020)	Condensate transport truck load	180 bbl/truc	ick	
Disconnect losses per connector Disconnect losses per connector Condensate density Connectors disconnected per event Transport trucks per year Transport trucks per day Disconnect events per year Disconnect Events per day  1.00 Cc/event 2.6E-04 gallons/event 3.405 lb/gal Unstabilized Condensate Analysis (2/27/2020) One hoses, one connector at each hose end. Conservatively assumes a single truck could offload at both skids during 1 trip.  Max Condensate Offloaded (gal/yr) / Condensate transport truck load (gal/truck) Max trucks per day Disconnect Events per day  1.00 Cc/event 2.6E-04 gallons/event Disconnect losses per connect (cc/event) / Conversion factor (cc/gallon) Unstabilized Condensate Analysis (2/27/2020) One hoses, one connector at each hose end. Conservatively assumes a single truck could offload at both skids during 1 trip. Max Condensate Offloaded (gal/yr) / Condensate transport truck load (gal/truck) Max trucks per day Equal to number of transport truck trips Equal to number of transport truck trips	Condensate transport truck load	7,560 gal/truc	ıck	Condensate transport truck load (Bbl/truck) x Conversion factor (gallons/bbl)
Disconnect losses per connector Condensate density Connectors disconnected per event Transport trucks per year Transport trucks per day Disconnect events per year Disconnect Events per day  2.6E-04 gallons/event Disconnect (cc/event) / Conversion factor (cc/gallon) Unstabilized Condensate Analysis (2/27/2020) One hoses, one connector at each hose end. Conservatively assumes a single truck could offload at both skids during 1 trip.  Max Condensate Offloaded (gal/yr) / Condensate transport truck load (gal/truck) Max trucks per day  Equal to number of transport truck trips Equal to number of transport truck trips	Max Condensate Off Load	5,000,000 gal/yr		Engineer Estimate of Condensate Production
Condensate density Connectors disconnected per event Transport trucks per year Transport trucks per day Disconnect events per day  3.405   b/gal Unstabilized Condensate Analysis (2/27/2020) One hoses, one connector at each hose end. Conservatively assumes a single truck could offload at both skids during 1 trip.  Max Condensate Offloaded (gal/yr) / Condensate transport truck load (gal/truck) Max trucks per day  Equal to number of transport truck trips  Equal to number of transport truck trips	Disconnect losses per connector	1.00 cc/ever	ent	Conservative Estimate
Connectors disconnected per event Transport trucks per year Transport trucks per day Disconnect events per day Disconnect Events per day  Connectors  2 connectors 662 trucks/yr Max Condensate Offloaded (gal/yr) / Condensate transport truck load (gal/truck) Max Condensate transport truck load (gal/truck) Max trucks per day Equal to number of transport truck trips Equal to number of transport truck trips	Disconnect losses per connector	2.6E-04 gallons	s/event	Disconnect losses per connect (cc/event) / Conversion factor (cc/gallon)
Transport trucks per year  Transport trucks per year  Transport trucks per day  Disconnect events per year  Disconnect Events per day  662 trucks/yr  Max Condensate Offloaded (gal/yr) / Condensate transport truck load (gal/truck)  Max trucks per day  Equal to number of transport truck trips  Equal to number of transport truck trips	Condensate density	3.405 lb/gal		Unstabilized Condensate Analysis (2/27/2020)
Transport trucks per day  2 trucks/day Disconnect events per year Disconnect Events per day  2 trucks/day 662 events per year Equal to number of transport truck trips Equal to number of transport truck trips	Connectors disconnected per event	2 connec	ectors	One hoses, one connector at each hose end. Conservatively assumes a single truck could offload at both skids during 1 trip.
Disconnect events per year  Disconnect Events per day  662 events per year  Equal to number of transport truck trips  Equal to number of transport truck trips	Transport trucks per year	662 trucks/y	/yr	Max Condensate Offloaded (gal/yr) / Condensate transport truck load (gal/truck)
Disconnect Events per day  2 events per day  Equal to number of transport truck trips	Transport trucks per day	2 trucks/d	/day	Max trucks per day
	Disconnect events per year	662 events	s per year	Equal to number of transport truck trips
Condensate VOC wt % 99.26% Unstabilized Condensate Analysis (2/27/2020)	Disconnect Events per day	2 events	s per day	Equal to number of transport truck trips
Official medical volume of the control of the contr	Condensate VOC wt %	99.26%		Unstabilized Condensate Analysis (2/27/2020)

#### **CONVERSION FACTORS**

Volume Conversion	42	gallons/bbl
Volume Conversion	3875	cc/gallon
Mass Conversion	2000	lb/ton

#### POTENTIAL EMISSIONS

	Potential Emissions		
Pollutant	(lbs/day) <sup>a</sup>	(tpy) <sup>b</sup>	
VOC	0.0035	5.77E-04	

<sup>&</sup>lt;sup>a</sup> Potential Hose Disconnect VOC Emissions (lbs/day) = Disconnect losses per connector (gal/event) x Density (lb/gal) x VOC (Wt. %) x Connectors disconnected per event x Events per day

b Potential Hose Disconnect VOC Emissions (tpy) = Disconnect losses per connector (gal/event) x Density (lb/gal) x VOC (Wt. %) x Connectors disconnected per event x Events per year / 2000 (lbs/ton)

## **Paved Haul Road Emissions**

Haul Input Information		
Unit(s):	HAUL	
Description:	Paved haul road emissions	

Input Data				
Empty vehicle weight <sup>1</sup>	16	tons		
Condensate Density <sup>2</sup>	3.41	lb/gal		
Load weight <sup>3</sup>	12.9	tons		
Loaded vehicle <sup>4</sup>	28.9	tons		
Mean vehicle weight <sup>5</sup>	22.44	tons		
Vehicle size	180	bbl		
Vehicle frequency <sup>6</sup>	8	vehicles/day		
Round-trip distance	0.32	mile/trip		
Truck Size	7560	Nominal		
Filling Time	0.5	Nominal		
Loadout Spots	1	Assumed		
Trip frequency <sup>7</sup>	1	trips/hour		
Trip frequency <sup>8</sup>	8760	trips/yr		
Surface silt content <sup>9</sup>	0.2	g/m <sup>2</sup>		
Annual wet days <sup>10</sup>	70	days/yr		
Vehicle miles traveled <sup>11</sup>	0.32	mile/hr		
Vehicle miles traveled	2803.2	miles/yr		

Emission Factors and Constants			
Parameter	PM <sub>10</sub>	PM <sub>2.5</sub>	
k, lb/VMT <sup>12</sup>	0.016	0.004	
Hourly EF, lb/VMT <sup>13</sup> Annual EF, lb/VMT <sup>14</sup>	0.07	0.02	
Annual EF, lb/VMT <sup>14</sup>	0.06	0.01	

Particulate Matter Emissions			
PM <sub>10</sub>	$PM_{2.5}$		
0.023	0.006	lb/hr <sup>15</sup>	
0.08	0.021	ton/yr16	

<sup>&</sup>lt;sup>1</sup> Empty vehicle weight includes driver and occupants and full fuel load.

<sup>&</sup>lt;sup>2</sup> Density is reference from the unstabilized condensate analysis (2/27/2020)

<sup>&</sup>lt;sup>3</sup> Cargo, transported materials, etc. (Density (lb/gal) \*7560 gal truck/ 2000lb/ton)

<sup>&</sup>lt;sup>4</sup> Loaded vehicle weight = Empty + Load Size

<sup>&</sup>lt;sup>5</sup> Mean Vehicle weight = (Loaded Weight + Empty Weight) / 2

<sup>&</sup>lt;sup>6</sup> Vehicles per day = Loadout volume / Truck size

<sup>&</sup>lt;sup>7</sup> Trips per hour = Total loadout spots / Loading time

<sup>&</sup>lt;sup>8</sup> Trips per year = Total throughput (bbl/yr) / Truck size (bbl)

<sup>&</sup>lt;sup>9</sup> Assumed silt content for paved roads

<sup>&</sup>lt;sup>10</sup> Per NMED Guidance

<sup>&</sup>lt;sup>11</sup> VMT/hr = Vehicle Miles Traveled per hour= Trips per hour \* Segment Length

<sup>&</sup>lt;sup>12</sup> Table 13.2.1-1

<sup>&</sup>lt;sup>13</sup> AP-42 13.2.1, Equation 1

<sup>&</sup>lt;sup>14</sup> AP-42 13.2.1, Equation 2

<sup>15</sup> lb/hr = Hourly EF (lb/VMT) \* VMT (mile/hr)

<sup>16</sup> ton/yr = Annual EF (lb/VMT) \* VMT (mile/hr) \* Hours of operation (hr/yr)

## **Unpaved Haul Road**

Haul Input Information		
Unit(s): HAUL		
Description:	Unpaved haul road emissions	

Input Data				
Empty vehicle weight <sup>1</sup>	16	tons		
Load weight <sup>2</sup>	12.9	tons		
Loaded vehicle <sup>3</sup>	28.9	tons		
Mean vehicle weight <sup>4</sup>	22.44	tons		
Condensate Throughput	1406	bbl/day		
Loadout volume	513248	bbl/yr		
Vehicle size	180	bbl		
Vehicle frequency <sup>5</sup>	8	vehicles/day		
Round-trip distance	0.05	mile/trip		
Truck Size:	7560	Nominal		
Filling Time:	0.75	Nominal		
Oil Loadout Spots	1	Assumed		
Trip frequency <sup>6</sup>	1.0	trips/hour		
Trip frequency <sup>7</sup>	8760	trips/yr		
Surface silt content <sup>8</sup>	4.8	%		
Annual wet days <sup>9</sup>	70	days/yr		
Vehicle miles traveled <sup>10</sup>	0.05	mile/hr		
Vehicle miles traveled	438.0	miles/yr		

Emission Factors and Constants				
Parameter	PM <sub>10</sub>	PM <sub>2.5</sub>		
k, lb/VMT <sup>11</sup>	1.5	0.15		
a, lb/VMT <sup>11</sup>	0.90	0.90		
b, lb/VMT <sup>11</sup>	0.45	0.45		
Hourly EF, lb/VMT <sup>12</sup>	1.63	0.16		
Annual EF, lb/VMT <sup>13</sup>	1.31	0.13		

<b>Emission Calculatio</b>	ns for Particບ	ılate Matter
PM <sub>10</sub>	PM <sub>2.5</sub>	
0.08	0.008	lb/hr <sup>14</sup>
0.29	0.029	ton/yr <sup>15</sup>

<sup>&</sup>lt;sup>1</sup> Empty vehicle weight includes driver and occupants and full fuel load.

<sup>&</sup>lt;sup>2</sup> Cargo, transported materials, etc. (Density (lb/gal) \*7560 gal truck/ 2000lb/ton)

<sup>&</sup>lt;sup>3</sup> Loaded vehicle weight = Empty + Load Size

<sup>&</sup>lt;sup>4</sup> Mean Vehicle weight = (Loaded Weight + Empty Weight) / 2

<sup>&</sup>lt;sup>5</sup> Vehicles per day = Loadout volume / Truck size

<sup>&</sup>lt;sup>6</sup> Trips per hour = Total loadout spots / Loading time

<sup>&</sup>lt;sup>7</sup> Trips per year = Total throughput (bbl/yr) / Truck size (bbl)

<sup>&</sup>lt;sup>8</sup> AP-42 Table 13.2.2-1

<sup>&</sup>lt;sup>9</sup> Per NMED Guidance

<sup>&</sup>lt;sup>10</sup> VMT/hr = Vehicle Miles Traveled per hour= Trips per hour \* Segment Length

<sup>&</sup>lt;sup>11</sup> Table 13.2.2-2, Industrial Roads

<sup>&</sup>lt;sup>12</sup> AP-42 13.2.2, Equation 1a

<sup>&</sup>lt;sup>13</sup> AP-42 13.2.2, Equation 2

<sup>&</sup>lt;sup>14</sup> lb/hr = Hourly EF (lb/VMT) \* VMT (mile/hr)

<sup>15</sup> ton/yr = Annual EF (lb/VMT) \* VMT (mile/hr) \* Hours of operation (hr/yr)

Saved Date: 11/24/2020

## **Section 7**

### **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.
- ☐ 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.
- ☐ 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.

#### Stabilized Condensate Loading (Unit LOAD-STAB)

- BR&E ProMax
- Liquids analysis

#### **Unstabilized Condensate Loading (Unit LOAD-STAB)**

- Hose disconnect volumes
- Liquids analysis

#### **Unpaved Haul Roads (Unit HAUL)**

- AP-42 Section 13.2.1
- AP-42 Section 13.2.2



9732L Linam Ranch Unstabilized Condensate

<u>inam Ranch Unstabilized</u> Condensate

Sample Point Code

Sample Point Name

Sample Point Location

**API** Gravity 92.5 Vapor Pressure (PSI) 61.4

Laborator	y Services	2020029841	0301			D Jett - Spot
Source L	aboratory	Lab File No	Container Ide	ntity		Sampler
USA		USA	USA			New Mexico
District		Area Name	Field Name			Facility Name
Feb 26, 202	20 15:15	Feb 26, 2020 15:15		Feb 27, 2	2020 08:00	Feb 27, 2020
Date San	npled	Date Effective		Date	Received	Date Reported
45.00		ВН				
Ambient Temp (°F)	Flow Rate (Mcf)	Analyst		@ Temp °F Conditions		
DCP Mid	stream				Exten	ded Liquid Analysis
Opera	ator	_		_	Lab	Source Description

Component	Mol %	Mass %	Liquid %	Gros	s Heating Values @	14.65 PSI
Nitrogen (N2)	0.0090	0.0040	0.0030	3,828.4	71357.5	20956.7
Carbon Dioxide (CO2)	0.0280	0.0180	0.0140	<b>= 1</b>	ulated Total Sample	•
Methane (C1)	0.0770	0.0180	0.0380	GPA2  Relative Density	145-16 *Calculated at Contra Absolute Density (lb/ga	
Ethane (C2)	1.6300	0.7050	1.2500	0.6317	3,405	92.5
Propane (C3)	13.1490	8.3380	10.3850	Molecular Weight	Vapor Volume (ft³/gal)	) Vapor Pressure (P
Isobutane (IC4)	6.1130	5.1090	5.7340	69.5410	18.639	61.4
n-Butane (NC4)	22.7150	18.9850	20.5290		Ratios	
Isopentane (IC5)	11.6570	12.0940	12.2210	C1 to C2		CO2 to C2
n-Pentane (NC5)	14.0400	14.5670	14.5900	2.95:1		1.11:1
2-methylpentane (2MC5)	3.8350	4.7520	4.5630	]	C6+ Group Proper	
3-methylpentane (3MC5)	2.2050	2.7330	2.5800	C6 - 40.733%	Assumed Composition C7 - 40.021%	C8 - 19.246%
Benzene	2.0780	2.3340	1.6670	0 40.73370	Field H2S	CO 13.24070
Ethylbenzene	0.0850	0.1300	0.0940	]	0 PPM	
M + P Xylenes	0.1960	0.3200	0.2450	]L		
O-Xylene	0.0550	0.0840	0.0600	PROTREND STATUS:	on Eob 27, 2020	DATA SOURCE:
Toluene	1.2590	1.6680	1.2090	Passed By Validator of Passed By Validator of Passed By Validator	•	Imported
Hexanes (C6's)	6.4190	7.7890	7.3220	Close enough to be c		e.
Heptanes (C7's)	10.1620	13.4220	11.5950	VALIDATOR: Dustin Armstrong		
Octanes (C8's)	3.5830	5.6830	4.8760	VALIDATOR COMMENTS	S:	
Nonanes (C9's)	0.5490	0.9460	0.7850	ОК		
Decanes (C10's)	0.1160	0.2240	0.1820	]		
Undecanes (C11's)	0.0370	0.0690	0.0510	]		

Dodecanes (C12's)

**TOTAL** 

0.0070

100.0000

0.0030

100.0000

0.0080

100.0000

LRP Stabilizer Feed

Sample Point Location

LRP Stabilizer Feed

Sample Point Name



9473L

Sample Point Code

Laboratory	/ Services	2020028887	0512		D Armstrong - Spot
Source La	boratory	Lab File No	Container Ide	ntity	Sampler
USA		USA	USA		New Mexico
District		Area Name	Field Name		Facility Name
Jan 29, 2020	0 15:37	Jan 29, 2020 15	5:37	Jan 30, 2020 08:	06 Jan 30, 2020
Date Sam	pled	Date Effective		Date Received	Date Reported
58.00		Torrance			
Ambient Temp (°F)	Flow Rate (Mcf)	Analyst		@ Temp °F Conditions	
DCP Mids	tream	_			NGL
Operator					Lab Source Description

Component	Mol %	Mass %	Liquid %
Nitrogen (N2)	0.0620	0.0260	0.0190
CO2 (CO2)	0.2250	0.1460	0.1090
H2S	0.0000	0.0000	0.0000
Methane	0.5920	0.1400	0.2840
Ethane	4.9540	2.1930	3.7490
Propane	16.7410	10.8680	13.0490
Iso-Butane	5.5730	4.7690	5.1600
n-Butane (NC4)	19.5970	16.7690	17.4800
Iso-Pentane	9.6860	10.2880	10.0220
n-Pentane (NC5)	11.6230	12.3460	11.9210
Hexanes Plus (C6+)	30.9470	42.4550	38.2070
TOTAL	100.0000	100.0000	100.0000

1	Gros	Gross Heating Values @ 14.73 PSI					
	BTU/ft³	BTU/Gal	BTU/lb				
	3,776.2	106867.0	21062.0				
	Calc	ulated Total Sample Pro	perties				
l	GPA2	145-16 *Calculated at Contract Co	onditions				
ł	Relative Density	Absolute Density (lb/gal)	API Gravity				
ļ	0.6086	5.074	101.0				
l	Molecular Weight	Vapor Volume (ft³/gal)	Vapor Pressure (PSI)				
	67.9257	28.300	119.8				
1		Ratios					
1	C1 to C2		CO2 to C2				
ł	7.04:1		2.83:1				
l		C6+ Group Properties	;				
ł		Assumed Composition					
ł	C6 - 60.000%	C7 - 30.000%	C8 - 10.000%				
		Field H2S					
		O DDM					
		0 PPM					

PROTREND STATUS:

DATA SOURCE:

Passed By Validator on Feb 2, 2020 Imported

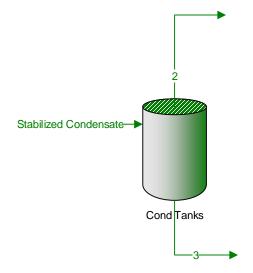
PASSED BY VALIDATOR REASON:

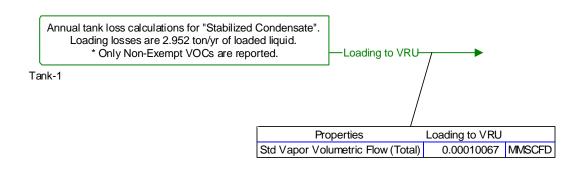
First sample taken @ this point, composition looks reasonable  ${\bf VALIDATOR:}$ 

**Dustin Armstrong** 

VALIDATOR COMMENTS:

ΟK





#### 13.2.2 Unpaved Roads

#### 13.2.2.1 General

When a vehicle travels an unpaved road, the force of the wheels on the road surface causes pulverization of surface material. Particles are lifted and dropped from the rolling wheels, and the road surface is exposed to strong air currents in turbulent shear with the surface. The turbulent wake behind the vehicle continues to act on the road surface after the vehicle has passed.

The particulate emission factors presented in the previous draft version of this section of AP-42, dated October 2001, implicitly included the emissions from vehicles in the form of exhaust, brake wear, and tire wear as well as resuspended road surface material<sup>25</sup>. EPA included these sources in the emission factor equation for unpaved public roads (equation 1b in this section) since the field testing data used to develop the equation included both the direct emissions from vehicles and emissions from resuspension of road dust.

This version of the unpaved public road emission factor equation only estimates particulate emissions from resuspended road surface material <sup>23, 26</sup>. The particulate emissions from vehicle exhaust, brake wear, and tire wear are now estimated separately using EPA's MOBILE6.2 <sup>24</sup>. This approach eliminates the possibility of double counting emissions. Double counting results when employing the previous version of the emission factor equation in this section and MOBILE6.2 to estimate particulate emissions from vehicle traffic on unpaved public roads. It also incorporates the decrease in exhaust emissions that has occurred since the unpaved public road emission factor equation was developed. The previous version of the unpaved public road emission factor equation includes estimates of emissions from exhaust, brake wear, and tire wear based on emission rates for vehicles in the 1980 calendar year fleet. The amount of PM released from vehicle exhaust has decreased since 1980 due to lower new vehicle emission standards and changes in fuel characteristics.

### 13.2.2.2 Emissions Calculation And Correction Parameters<sup>1-6</sup>

The quantity of dust emissions from a given segment of unpaved road varies linearly with the volume of traffic. Field investigations also have shown that emissions depend on source parameters that characterize the condition of a particular road and the associated vehicle traffic. Characterization of these source parameters allow for "correction" of emission estimates to specific road and traffic conditions present on public and industrial roadways.

Dust emissions from unpaved roads have been found to vary directly with the fraction of silt (particles smaller than 75 micrometers [µm] in diameter) in the road surface materials. The silt fraction is determined by measuring the proportion of loose dry surface dust that passes a 200-mesh screen, using the ASTM-C-136 method. A summary of this method is contained in Appendix C of AP-42. Table 13.2.2-1 summarizes measured silt values for industrial unpaved roads. Table 13.2.2-2 summarizes measured silt values for public unpaved roads. It should be noted that the ranges of silt content vary over two orders of magnitude. Therefore, the use of data from this table can potentially introduce considerable error. Use of this data is strongly discouraged when it is feasible to obtain locally gathered data.

Since the silt content of a rural dirt road will vary with geographic location, it should be measured for use in projecting emissions. As a conservative approximation, the silt content of the parent soil in the area can be used. Tests, however, show that road silt content is normally lower than in the surrounding parent soil, because the fines are continually removed by the vehicle traffic, leaving a higher percentage of coarse particles.

Other variables are important in addition to the silt content of the road surface material. For example, at industrial sites, where haul trucks and other heavy equipment are common, emissions are highly correlated with vehicle weight. On the other hand, there is far less variability in the weights of cars and pickup trucks that commonly travel publicly accessible unpaved roads throughout the United States. For those roads, the moisture content of the road surface material may be more dominant in determining differences in emission levels between, for example a hot, desert environment and a cool, moist location.

The PM-10 and TSP emission factors presented below are the outcomes from stepwise linear regressions of field emission test results of vehicles traveling over unpaved surfaces. Due to a limited amount of information available for PM-2.5, the expression for that particle size range has been scaled against the result for PM-10. Consequently, the quality rating for the PM-2.5 factor is lower than that for the PM-10 expression.

Table 13.2.2-1. TYPICAL SILT CONTENT VALUES OF SURFACE MATERIAL ON INDUSTRIAL UNPAVED ROADS  $^{\rm a}$ 

	Road Use Or	Plant	No. Of	Silt Conte	ent (%)
Industry	Surface Material	Sites	Samples	Range	Mean
Copper smelting	Plant road	1	3	16 - 19	17
Iron and steel production	Plant road	19	135	0.2 - 19	6.0
Sand and gravel processing	Plant road	1	3	4.1 - 6.0	4.8
	Material storage area	1	1	-	7.1
Stone quarrying and processing	Plant road	2	10	2.4 - 16	10
	Haul road to/from pit	4	20	5.0-15	8.3
Taconite mining and processing	Service road	1	8	2.4 - 7.1	4.3
	Haul road to/from pit	1	12	3.9 - 9.7	5.8
Western surface coal mining	Haul road to/from pit	3	21	2.8 - 18	8.4
	Plant road	2	2	4.9 - 5.3	5.1
	Scraper route	3	10	7.2 - 25	17
	Haul road (freshly graded)	2	5	18 - 29	24
Construction sites	Scraper routes	7	20	0.56-23	8.5
Lumber sawmills	Log yards	2	2	4.8-12	8.4
Municipal solid waste landfills	Disposal routes	4	20	2.2 - 21	6.4

<sup>&</sup>lt;sup>a</sup>References 1,5-15.

The following empirical expressions may be used to estimate the quantity in pounds (lb) of size-specific particulate emissions from an unpaved road, per vehicle mile traveled (VMT):

For vehicles traveling on unpaved surfaces at industrial sites, emissions are estimated from the following equation:

$$E = k (s/12)^a (W/3)^b$$
 (1a)

and, for vehicles traveling on publicly accessible roads, dominated by light duty vehicles, emissions may be estimated from the following:

$$E = \frac{k (s/12)^{a} (S/30)^{d}}{(M/0.5)^{c}} - C$$
 (1b)

where k, a, b, c and d are empirical constants (Reference 6) given below and

E = size-specific emission factor (lb/VMT)

s = surface material silt content (%)

W = mean vehicle weight (tons)

M = surface material moisture content (%)

S = mean vehicle speed (mph)

C =emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear.

The source characteristics s, W and M are referred to as correction parameters for adjusting the emission estimates to local conditions. The metric conversion from lb/VMT to grams (g) per vehicle kilometer traveled (VKT) is as follows:

$$1 \text{ lb/VMT} = 281.9 \text{ g/VKT}$$

The constants for Equations 1a and 1b based on the stated aerodynamic particle sizes are shown in Tables 13.2.2-2 and 13.2.2-4. The PM-2.5 particle size multipliers (k-factors) are taken from Reference 27.

Table 13.2.2-2. CONSTANTS FOR EQUATIONS 1a AND 1b

	Industrial Roads (Equation 1a)			Public Roads (Equation 1b)		
Constant	PM-2.5	PM-10	PM-30*	PM-2.5	PM-10	PM-30*
k (lb/VMT)	0.15	1.5	4.9	0.18	1.8	6.0
a	0.9	0.9	0.7	1	1	1
b	0.45	0.45	0.45	-	-	-
С	ı	1	-	0.2	0.2	0.3
d		-	-	0.5	0.5	0.3
Quality Rating	В	В	В	В	В	В

<sup>\*</sup>Assumed equivalent to total suspended particulate matter (TSP)

Table 13.2.2-2 also contains the quality ratings for the various size-specific versions of Equation 1a and 1b. The equation retains the assigned quality rating, if applied within the ranges of source conditions, shown in Table 13.2.2-3, that were tested in developing the equation:

Table 13.2.2-3. RANGE OF SOURCE CONDITIONS USED IN DEVELOPING EQUATION 1a AND 1b

			Vehicle ight		Vehicle eed	Mean	Surface Moisture
Emission Factor	Surface Silt Content, %	Mg	ton	km/hr	mph	No. of Wheels	Content, %
Industrial Roads (Equation 1a)	1.8-25.2	1.8-260	2-290	8-69	5-43	4-17ª	0.03-13
Public Roads (Equation 1b)	1.8-35	1.4-2.7	1.5-3	16-88	10-55	4-4.8	0.03-13

<sup>&</sup>lt;sup>a</sup> See discussion in text.

As noted earlier, the models presented as Equations 1a and 1b were developed from tests of traffic on unpaved surfaces. Unpaved roads have a hard, generally nonporous surface that usually dries quickly after a rainfall or watering, because of traffic-enhanced natural evaporation. (Factors influencing how fast a road dries are discussed in Section 13.2.2.3, below.) The quality ratings given above pertain to the mid-range of the measured source conditions for the equation. A higher mean vehicle weight and a higher than normal traffic rate may be justified when performing a worst-case analysis of emissions from unpaved roads.

The emission factors for the exhaust, brake wear and tire wear of a 1980's vehicle fleet (C) was obtained from EPA's MOBILE6.2 model  $^{23}$ . The emission factor also varies with aerodynamic size range

<sup>&</sup>quot;-" = not used in the emission factor equation

Table 13.2.2-4. EMISSION FACTOR FOR 1980'S VEHICLE FLEET EXHAUST, BRAKE WEAR AND TIRE WEAR

Particle Size Range <sup>a</sup>	C, Emission Factor for Exhaust, Brake Wear and Tire Wear <sup>b</sup>
$PM_{2.5}$	0.00036
$PM_{10}$	0.00047
$PM_{30}^{c}$	0.00047

- <sup>a</sup> Refers to airborne particulate matter (PM-x) with an aerodynamic diameter equal to or less than x micrometers.
- b Units shown are pounds per vehicle mile traveled (lb/VMT).
- <sup>c</sup> PM-30 is sometimes termed "suspendable particulate" (SP) and is often used as a surrogate for TSP.

It is important to note that the vehicle-related source conditions refer to the average weight, speed, and number of wheels for all vehicles traveling the road. For example, if 98 percent of traffic on the road are 2-ton cars and trucks while the remaining 2 percent consists of 20-ton trucks, then the mean weight is 2.4 tons. More specifically, Equations 1a and 1b are *not* intended to be used to calculate a separate emission factor for each vehicle class within a mix of traffic on a given unpaved road. That is, in the example, one should *not* determine one factor for the 2-ton vehicles and a second factor for the 20-ton trucks. Instead, only one emission factor should be calculated that represents the "fleet" average of 2.4 tons for all vehicles traveling the road.

Moreover, to retain the quality ratings when addressing a group of unpaved roads, it is necessary that reliable correction parameter values be determined for the road in question. The field and laboratory procedures for determining road surface silt and moisture contents are given in AP-42 Appendices C.1 and C.2. Vehicle-related parameters should be developed by recording visual observations of traffic. In some cases, vehicle parameters for industrial unpaved roads can be determined by reviewing maintenance records or other information sources at the facility.

In the event that site-specific values for correction parameters cannot be obtained, then default values may be used. In the absence of site-specific silt content information, an appropriate mean value from Table 13.2.2-1 may be used as a default value, but the quality rating of the equation is reduced by two letters. Because of significant differences found between different types of road surfaces and between different areas of the country, use of the default moisture content value of 0.5 percent in Equation 1b is discouraged. The quality rating should be downgraded two letters when the default moisture content value is used. (It is assumed that readers addressing industrial roads have access to the information needed to develop average vehicle information in Equation 1a for their facility.)

The effect of routine watering to control emissions from unpaved roads is discussed below in Section 13.2.2.3, "Controls". However, all roads are subject to some natural mitigation because of rainfall and other precipitation. The Equation 1a and 1b emission factors can be extrapolated to annual

average uncontrolled conditions (but including natural mitigation) under the simplifying assumption that annual average emissions are inversely proportional to the number of days with measurable (more than 0.254 mm [0.01 inch]) precipitation:

$$E_{\text{ext}} = E [(365 - P)/365]$$
 (2)

where:

E<sub>ext</sub> = annual size-specific emission factor extrapolated for natural mitigation, lb/VMT

E = emission factor from Equation 1a or 1b

P = number of days in a year with at least 0.254 mm (0.01 in) of precipitation (see

below)

Figure 13.2.2-1 gives the geographical distribution for the mean annual number of "wet" days for the United States.

Equation 2 provides an estimate that accounts for precipitation on an annual average basis for the purpose of inventorying emissions. It should be noted that Equation 2 does not account for differences in the temporal distributions of the rain events, the quantity of rain during any event, or the potential for the rain to evaporate from the road surface. In the event that a finer temporal and spatial resolution is desired for inventories of public unpaved roads, estimates can be based on a more complex set of assumptions. These assumptions include:

- 1. The moisture content of the road surface material is increased in proportion to the quantity of water added;
- 2. The moisture content of the road surface material is reduced in proportion to the Class A pan evaporation rate;
- 3. The moisture content of the road surface material is reduced in proportion to the traffic volume; and
- 4. The moisture content of the road surface material varies between the extremes observed in the area. The CHIEF Web site (http://www.epa.gov/ttn/chief/ap42/ch13/related/c13s02-2.html) has a file which contains a spreadsheet program for calculating emission factors which are temporally and spatially resolved. Information required for use of the spreadsheet program includes monthly Class A pan evaporation values, hourly meteorological data for precipitation, humidity and snow cover, vehicle traffic information, and road surface material information.

It is emphasized that the simple assumption underlying Equation 2 and the more complex set of assumptions underlying the use of the procedure which produces a finer temporal and spatial resolution have not been verified in any rigorous manner. For this reason, the quality ratings for either approach should be downgraded one letter from the rating that would be applied to Equation 1.

#### 13.2.2.3 Controls<sup>18-22</sup>

A wide variety of options exist to control emissions from unpaved roads. Options fall into the following three groupings:

1. Vehicle restrictions that limit the speed, weight or number of vehicles on the road;

- 2. <u>Surface improvement</u>, by measures such as (a) paving or (b) adding gravel or slag to a dirt road; and
  - 3. <u>Surface treatment</u>, such as watering or treatment with chemical dust suppressants.

Available control options span broad ranges in terms of cost, efficiency, and applicability. For example, traffic controls provide moderate emission reductions (often at little cost) but are difficult to enforce. Although paving is highly effective, its high initial cost is often prohibitive. Furthermore, paving is not feasible for industrial roads subject to very heavy vehicles and/or spillage of material in transport. Watering and chemical suppressants, on the other hand, are potentially applicable to most industrial roads at moderate to low costs. However, these require frequent reapplication to maintain an acceptable level of control. Chemical suppressants are generally more cost-effective than water but not in cases of temporary roads (which are common at mines, landfills, and construction sites). In summary, then, one needs to consider not only the type and volume of traffic on the road but also how long the road will be in service when developing control plans.

<u>Vehicle restrictions</u>. These measures seek to limit the amount and type of traffic present on the road or to lower the mean vehicle speed. For example, many industrial plants have restricted employees from driving on plant property and have instead instituted bussing programs. This eliminates emissions due to employees traveling to/from their worksites. Although the heavier average vehicle weight of the busses increases the base emission factor, the decrease in vehicle-miles-traveled results in a lower overall emission rate.

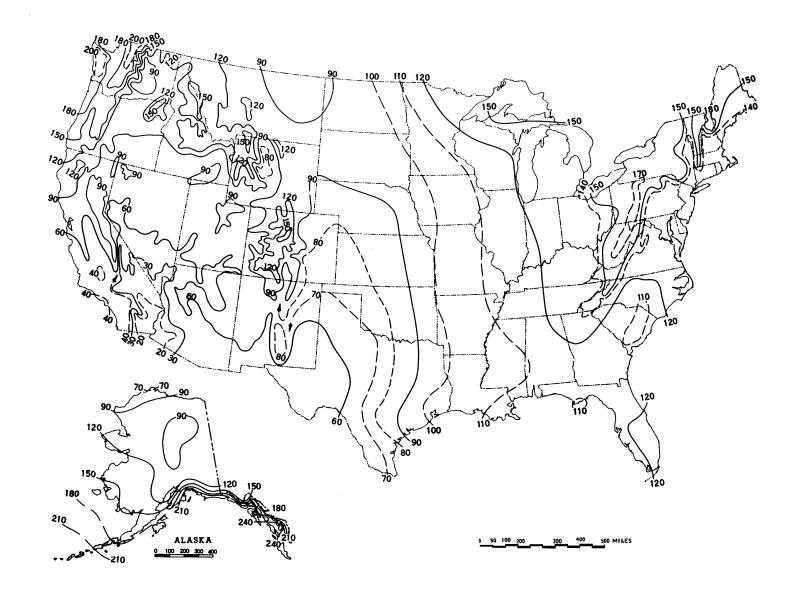


Figure 13.2.2-1. Mean number of days with 0.01 inch or more of precipitation in United States.

#### 13.2.1 Paved Roads

#### 13.2.1.1 General

Particulate emissions occur whenever vehicles travel over a paved surface such as a road or parking lot. Particulate emissions from paved roads are due to direct emissions from vehicles in the form of exhaust, brake wear and tire wear emissions and resuspension of loose material on the road surface. In general terms, resuspended particulate emissions from paved roads originate from, and result in the depletion of, the loose material present on the surface (i.e., the surface loading). In turn, that surface loading is continuously replenished by other sources. At industrial sites, surface loading is replenished by spillage of material and trackout from unpaved roads and staging areas. Figure 13.2.1-1 illustrates several transfer processes occurring on public streets.

Various field studies have found that public streets and highways, as well as roadways at industrial facilities, can be major sources of the atmospheric particulate matter within an area. Of particular interest in many parts of the United States are the increased levels of emissions from public paved roads when the equilibrium between deposition and removal processes is upset. This situation can occur for various reasons, including application of granular materials for snow and ice control, mud/dirt carryout from construction activities in the area, and deposition from wind and/or water erosion of surrounding unstabilized areas. In the absence of continuous addition of fresh material (through localized trackout or application of antiskid material), paved road surface loading should reach an equilibrium value in which the amount of material resuspended matches the amount replenished. The equilibrium surface loading value depends upon numerous factors. It is believed that the most important factors are: mean speed of vehicles traveling the road; the average daily traffic (ADT); the number of lanes and ADT per lane; the fraction of heavy vehicles (buses and trucks); and the presence/absence of curbs, storm sewers and parking lanes.

EPA's Office of Transportation and Air Quality plans to release the MOBILE6.1 model soon. This model will calculate particulate emissions from on road mobile sources from the engine exhaust, brake wear and tire wear. The emission factors in this section of AP-42 implicitly include the emissions of exhaust, brake wear, and tire wear that occurred in the field testing that produced the data used to develop the emission factor equation, in addition to resuspended particulate matter from the road surface. Therefore, adding the emission factors in this section to those calculated by MOBILE6.1 poses the problem of double counting. The double counting problem is of most concern when estimating the emissions on high traffic volume roads with low surface silt loadings. The following modifications should be made if double counting is a substantial issue for a particular application of this section. Where MOBILE6.1 predicts higher emissions of particulate matter than the equations in this section for a given combination of road and traffic variables, then only the MOBILE6.1 results should be used and resuspended particulate matter should be considered negligible. Where MOBILE6.1 predictions are less than the emissions that would be predicted from the equation in this section, then the emissions calculated with the equation in this section can be taken as a reasonable representation of total particulate emissions. If in such a case it is desired to separate emissions into resuspended particulate matter versus exhaust, brake and tire wear matter, then the MOBILE6.1 estimates can be subtracted from the estimates made using the equation in this section with the remainder taken as the resuspended portion of the emissions.

#### 13.2.1.2 Emissions And Correction Parameters

Dust emissions from paved roads have been found to vary with what is termed the "silt loading" present on the road surface as well as the average weight of vehicles traveling the road. The term silt loading (sL) refers to the mass of silt-size material (equal to or less than 75 micrometers [µm] in physical diameter) per unit area of the travel surface. The total road surface dust loading consists of loose material that can be collected by broom sweeping and vacuuming of the traveled portion of the paved road. The silt fraction is determined by measuring the proportion of the loose dry surface dust that passes through a 200-mesh screen, using the ASTM-C-136 method. Silt loading is the product of the silt fraction and the total loading, and is abbreviated "sL". Additional details on the sampling and analysis of such material are provided in AP-42 Appendices C.1 and C.2.

The surface sL provides a reasonable means of characterizing seasonal variability in a paved road emission inventory. In many areas of the country, road surface loadings <sup>11-21</sup> are heaviest during the late winter and early spring months when the residual loading from snow/ice controls is greatest. As noted earlier, once replenishment of fresh material is eliminated, the road surface loading can be expected to reach an equilibrium value, which is substantially lower than the late winter/early spring values.

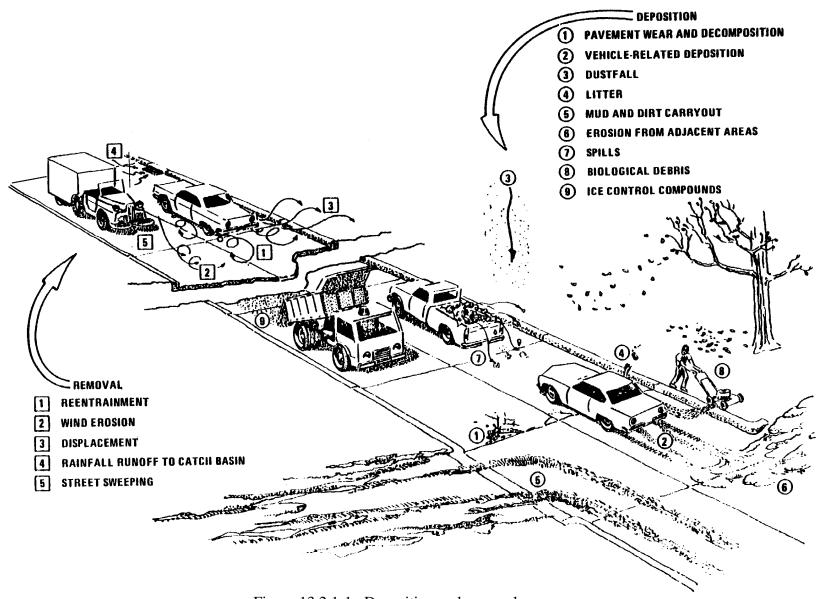


Figure 13.2.1-1. Deposition and removal processes.

### 13.2.1.3 Predictive Emission Factor Equations<sup>10</sup>

The quantity of particulate emissions from vehicle traffic on a dry paved road may be estimated using the following empirical expression:

$$E=k (sL/2)^{0.65} (W/3)^{1.5}$$
 (1)

where:

E = particulate emission factor (having units matching the units of k)

k = particle size multiplier for particle size range and units of interest (see below)

sL = road surface silt loading (grams per square meter) (g/m<sup>2</sup>)

W = average weight (tons) of the vehicles traveling the road

It is important to note that Equation 1 calls for the average weight of all vehicles traveling the road. For example, if 99 percent of traffic on the road are 2 ton cars/trucks while the remaining 1 percent consists of 20 ton trucks, then the mean weight "W" is 2.2 tons. More specifically, Equation 1 is *not* intended to be used to calculate a separate emission factor for each vehicle weight class. Instead, only one emission factor should be calculated to represent the "fleet" average weight of all vehicles traveling the road.

The particle size multiplier (k) above varies with aerodynamic size range as shown in Table 13.2.1-1. To determine particulate emissions for a specific particle size range, use the appropriate value of k shown in Table 13.2.1-1.

			`		
Size range <sup>a</sup>	Particle Size Multiplier k <sup>b</sup>				
	g/VKT	g/VMT	lb/VMT		
PM-2.5°	1.1	1.8	0.0040		
PM-10	4.6	7.3	0.016		
PM-15	5.5	9.0	0.020		
PM-30 <sup>d</sup>	24	38	0.082		

Table 13.2-1.1. PARTICLE SIZE MULTIPLIERS FOR PAVED ROAD EQUATION

The above equation is based on a regression analysis of numerous emission tests, including 65 tests for PM-10. Sources tested include public paved roads, as well as controlled and uncontrolled industrial paved roads. All sources tested were of freely flowing vehicles traveling at constant speed on relatively level roads. No tests of "stop-and-go" traffic or vehicles under load were available for inclusion in the data base. The equations retain the quality rating of A (B for PM-2.5), if applied within the range of source conditions that were tested in developing the equation as follows:

<sup>&</sup>lt;sup>a</sup> Refers to airborne particulate matter (PM-x) with an aerodynamic diameter equal to or less than x micrometers.

b Units shown are grams per vehicle kilometer traveled (g/VKT), grams per vehicle mile traveled (g/VMT), and pounds per vehicle mile traveled (lb/VMT). The multiplier k includes unit conversions to produce emission factors in the units shown for the indicated size range from the mixed units required in Equation 1.

<sup>&</sup>lt;sup>c</sup> Ratio of PM-2.5 to PM-10 taken from Reference 22.

<sup>&</sup>lt;sup>d</sup> PM-30 is sometimes termed "suspendable particulate" (SP) and is often used as a surrogate for TSP.

Silt loading:  $0.02 - 400 \text{ g/m}^2$ 

0.03 - 570 grains/square foot (ft<sup>2</sup>)

Mean vehicle weight: 1.8 - 38 megagrams (Mg)

2.0 - 42 tons

Mean vehicle speed: 16 - 88 kilometers per hour (kph)

10 - 55 miles per hour (mph)

To retain the quality rating for the emission factor equation when it is applied to a specific paved road, it is necessary that reliable correction parameter values for the specific road in question be determined. With the exception of limited access roadways, which are difficult to sample, the collection and use of site-specific silt loading (sL) data for public paved road emission inventories are strongly recommended. The field and laboratory procedures for determining surface material silt content and surface dust loading are summarized in Appendices C.1 and C.2. In the event that site-specific values cannot be obtained, an appropriate value for a paved public road may be selected from the values given in Table 13.2.1-2, but the quality rating of the equation should be reduced by 2 levels. Also, recall that Equation 1 refers to emissions due to freely flowing (not stop-and-go) traffic at constant speed on level roads.

Equation 1 may be extrapolated to average uncontrolled conditions (but including natural mitigation) under the simplifying assumption that annual (or other long-term) average emissions are inversely proportional to the frequency of measurable (> 0.254 mm [ 0.01 inch]) precipitation by application of a precipitation correction term. The precipitation correction term can be applied on a daily or an hourly basis. For the daily basis, equation 1 becomes:

$$E_{\text{ext}} = k (sL/2)^{0.65} (W/3)^{1.5} (1-P/4N)$$
 (2)

where k, sL, and W are as defined in Equation 1 and

 $E_{ext}$  = annual or other long-term average emission factor in the same units as k

P = number of "wet" days with at least 0.254 mm (0.01 in) of precipitation during the averaging period

N = number of days in the averaging period (e.g., 365 for annual, 91 for seasonal, 30 for monthly)

Note that the assumption leading to Equation 2 is based on analogy with the approach used to develop long-term average unpaved road emission factors in Section 13.2.2. However, Equation 2 above incorporates an additional factor of "4" in the denominator to account for the fact that paved roads dry more quickly than unpaved roads and that the precipitation may not occur over the complete 24-hour day.

For the hourly basis, equation 1 becomes:

$$E_{\text{ext}} = k (sL/2)^{0.65} (W/3)^{1.5} (1-1.2P/N)$$
 (3)

where k, sL, and W are as defined in Equation 1 and

 $E_{ext}$  = annual or other long-term average emission factor in the same units as k

P = number of hours with at least 0.254 mm (0.01 in) of precipitation during the averaging period

N = number of hours in the averaging period (e.g., 8760 for annual, 2124 for seasonal, 720 for monthly)

Note: In the hourly moisture correction term (1-1.2P/N) for equation 3, the 1.2 multiplier is applied to account for the residual mitigative effect of moisture. For most applications, this equation will produce satisfactory results. However, if the time interval for which the equation is applied is short, e.g., for one hour or one day, the application of this multiplier makes it possible for the moisture correction term to become negative. This will result in calculated negative emissions which is not realistic. Users should expand the time interval to include sufficient "dry" hours such that negative emissions are not calculated. For the special case where this equation is used to calculate emissions on an hour by hour basis, such as would be done in some emissions modeling situations, the moisture correction term should be modified so that the moisture correction "credit" is applied to the first hours following cessation of precipitation. In this special case, it is suggested that this 20% "credit" be applied on a basis of one hour credit for each hour of precipitation up to a maximum of 12 hours.

Note that the assumption leading to Equation 3 is based on analogy with the approach used to develop long-term average unpaved road emission factors in Section 13.2.2.

Figure 13.2.1-2 presents the geographical distribution of "wet" days on an annual basis for the United States. Maps showing this information on a monthly basis are available in the *Climatic Atlas of the United States*<sup>23</sup>. Alternative sources include other Department of Commerce publications (such as local climatological data summaries). The National Climatic Data Center (NCDC) offers several products that provide hourly precipitation data. In particular, NCDC offers *Solar and Meteorological Surface Observation Network 1961-1990* (SAMSON) CD-ROM, which contains 30 years worth of hourly meteorological data for first-order National Weather Service locations. Whatever meteorological data are used, the source of that data and the averaging period should be clearly specified.

It is emphasized that the simple assumption underlying Equations 2 and 3 has not been verified in any rigorous manner. For that reason, the quality ratings for Equations 2 and 3 should be downgraded one letter from the rating that would be applied to Equation 1.

During the preparation of the background document (Reference 10), public road silt loading values from 1992 and earlier were assembled into a data base. This data base is available in the file named "r13s03-1b.zip" located at the Internet URL

"http://www.epa.gov/ttn/chief/ap42/ch13/related/c13s02-1.html" on the World Wide Web. Although hundreds of public paved road silt loading measurements had been collected, there was no uniformity in sampling equipment and analysis techniques, in roadway classification schemes, and in the types of data reported. Not surprisingly, the data set did not yield a coherent relationship between silt loading and road class, average daily traffic (ADT), etc., even though an inverse relationship between silt loading and ADT has been found for a subclass of curbed paved roads in urban areas. Further complicating the analysis is the fact that, in many parts of the country, paved road silt loading varies greatly over the course of the year, probably because of cyclic variations in mud/dirt carryout and in use of anti-skid materials. Although there were strong reasons to suspect that the assembled data base was skewed towards high values, independent data were not available to confirm the suspicions.

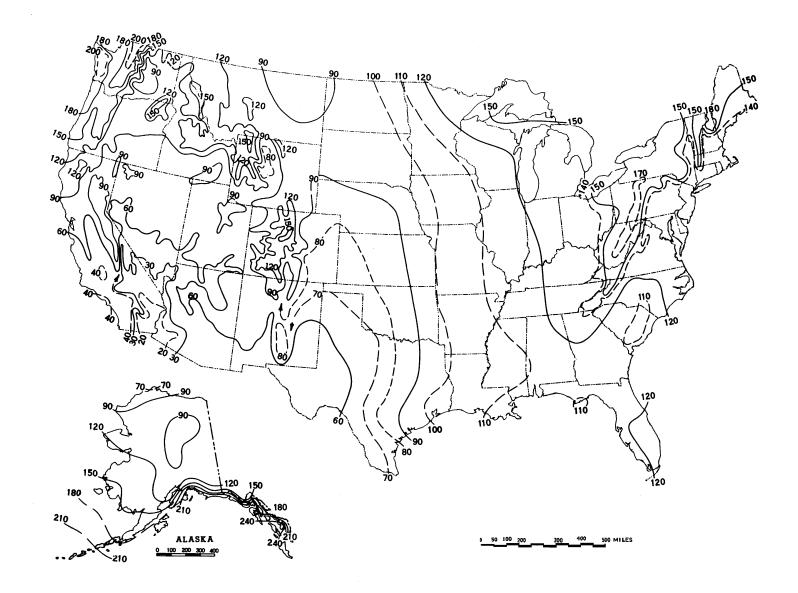


Figure 13.2.1-2. Mean number of days with 0.01 inch or more of precipitation in the United States.

Saved Date: 11/24/2020

# **Section 8**

## Map(s)

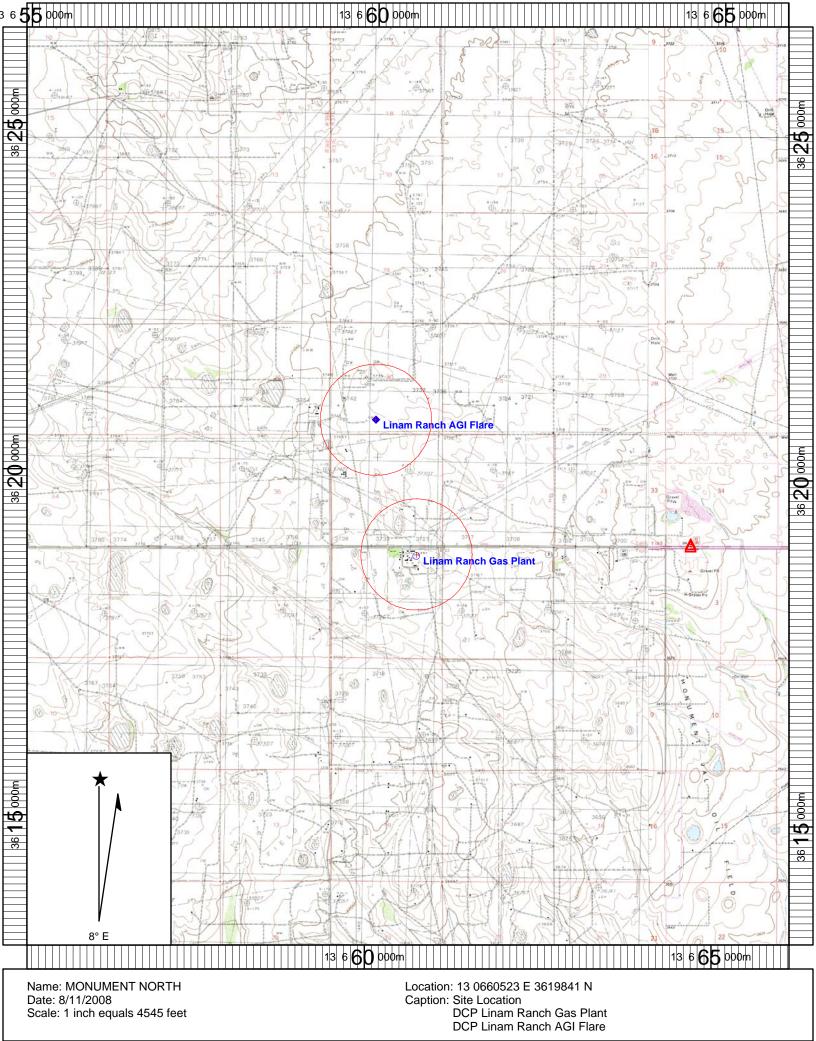
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<u>A map</u> such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

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	

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

A topographic map is included in this section.



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## **Section 9**

### **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:

- 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. \(\overline{\text{\ti}}\text{\texi}\text{\text{\texi}\text{\text{\tin}\text{\text{\text{\text{\text{\texi}\text{\text{\texit{\text{\texi}\text{\texi}\text{\text{\text{\text{\text{\text{\text{\tet
- 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.

All public notice requirements have been completed and are included in this section.

STATE OF NEW MEXICO **COUNTY OF LEA** 

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

> Beginning with the issue dated November 27, 2020 and ending with the issue dated November 27, 2020.

Chaselle Publisher

Sworn and subscribed to before me this 27th day of November 2020.

Business Manager

My commission expires January 29, 2023



OFFICIAL SEAL **GUSSIE BLACK** Notary Public State of New Mexico
My Commission Expires 12972

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

#### LEGAL NOTICE **NOVEMBER 27, 2020**

### NOTICE OF AIR QUALITY PERMIT APPLICATION

DCP Midstream, LP announces its application submittal to the New Mexico Environment Department for an air quality permit for the modification of its Gas Plant facility. The expected date of application submittal to the Air Quality Bureau is November 20, 2020.

The exact location for the facility, known as Linam Ranch Gas Plant, is at latitude 32 deg, 41 min, 43 sec and longitude -103 deg, 17 min, 07 sec. The approximate location of this facility is 7 miles west of Hobbs, New Mexico in Lea County. To reach the facility from Hobbs, NM, travel 7 miles west on Hwy 62/180. The facility is adjacent to the highway on your left.

The proposed revision consists of an increase in condensate loading and hauling from the facility.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and could change slightly during the course of the Department's review:

Pollutant:	Pounds per hour	Tons per year
	12 pph	50 tpy
PM 10	10 pph	50 tpy
PM 2.5 Sulfur Dioxide (SO2)	33,000 pph	99 tpy
Sulfur Dioxide (SOZ)	660 pph	1,018 tpy
Nitrogen Oxides (NOx)	2,100 pph	650 tpy
Carbon Monoxide (CO) Volatile Organic Compounds (VOC)	7,300 pph	249 tpy
Total sum of all Hazardous Air Pollutants (H		60 tpy
Total sum of all ridzardous All 1 ollutaries (1	298 pph	11 tpy
Hydrogen Sulfide (H2S)  Green House Gas Emissions as Total CO2		> 100,000 tpy

The standard and maximum operating schedules of the facility will be 24 hours per day, 7 days a week and a maximum of 52 weeks per year.

The owner and operator of the Facility is: DCP Midstream, LP, 10 Desta Drive, Suite 400 West, Midland, TX 79705

If you have any comments about the construction or operation of this facility, and you want your comments about the construction of operation of this racility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816; (505) 4 7 6 - 4 3 0 0 ; 1 8 0 0 2 2 4 - 7 0 0 9 4 7 6 - 4 3 0 0 ; 1 8 0 0 2 2 4 - 7 0 0 3 https://www.env.nm.gov/aqb/permit/aqb\_draft\_permits.html. Other comments and questions may be submitted verbally.

Please refer to the company name and site name or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

General information about air quality and the permitting process can be found at the Air Quality Bureau's web site. The regulation dealing with public participation in the permit review process is 20.2.72.206 NMAC. This regulation can be found in the "Permits" section of this web site.

Attención Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuniquese con esa oficina al teléfono 505-476-5557.

### **Notice of Non-Discrimination**

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TRINITY CONSULTANTS 9400 HOLLY AVE NE BLG 3 **STE 300** ALBUQUERQUE, NM 87122

## Affidavit of Publication

STATE OF NEW MEXICO COUNTY OF LEA

I, Daniel Russell, Publisher of the Hobbs News-Sun, a newspaper published at Hobbs, New Mexico, solemnly swear that the clipping attached hereto was published in the regular and entire issue of said newspaper, and not a supplement thereof for a period of 1 issue(s).

> Beginning with the issue dated November 27, 2020 and ending with the issue dated November 27, 2020.

Publisher

Sworn and subscribed to before me this 27th day of November 2020.

Business Manager

My commission expires

January 20, 2023

OFFICIAL BEAL GUSSIE BLACK Notary Public State of New MoxIo My Commission Expires

Proc. 1 1955 N. P. Salley S. Marier, American Confession This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937 and payment of fees for said

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Pollutant:	Pounds per hour	Tons per year
PM 10	12 pph	50 tpy
PM. 2,5	10 pph	50 tpy
Sulfur Dioxide (SO <sub>2</sub> )	33,000 pph	99 tpv
Nitrogen Oxides (NO <sub>x</sub> )	660 pph .	1,018 tpy
Carbon Monoxide (CO)	2,100 pph	650 tpy
Volatile Organic Compounds (VOC)	7,300 pph	249 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	100 pph	60 tpy
Hydrogen Sulfide (H <sub>2</sub> S)	298 pph	11 tpy
Green House Gas Emissions as Total CO2e	n/a	> 100,000 tpy

The standard and maximum operating schedules of the facility will be 24 hours per day, 7 days a week and a maximum of 52 weeks per year.

The owner and operator of the Facility is: DCP Midstream, LP, 10 Desta Drive, Suite 400 West, Midland, TX 79705

If you have any comments about the construction or operation of this facility, and you want your comments to be, made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Burcau; 525 Camino de los Marquez, Suite New Mexico; 87505-1816; (505) 476-4300; 1 https://www.env.nm.gov/aqb/pennit/aqb\_draft\_permits.html. Other comments and questions may be submitted

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#### Notice of Non-Discrimination

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, you may contact: Kristine Pintado, Non-Discrimination Coordinator, New Mexico Environment Department, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, nd.coordinator@state.nm.us. If you believe that you have been discriminated against with respect to a NMED program or activity, you may contact the Non-Discrimination Coordinator identified above or visit our website at https://www.env.nm.gov/NMED/El/index.html to learn how and where to file a complaint of discrimination.

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TRINITY CONSULTANTS 9400 HOLLY AVE NE BLG 3 **STE 300** ALBUQUERQUE, NM 87122

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#### CERTIFIED MAIL Sent via certified mail

To whom it may concern:

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Sincerely,

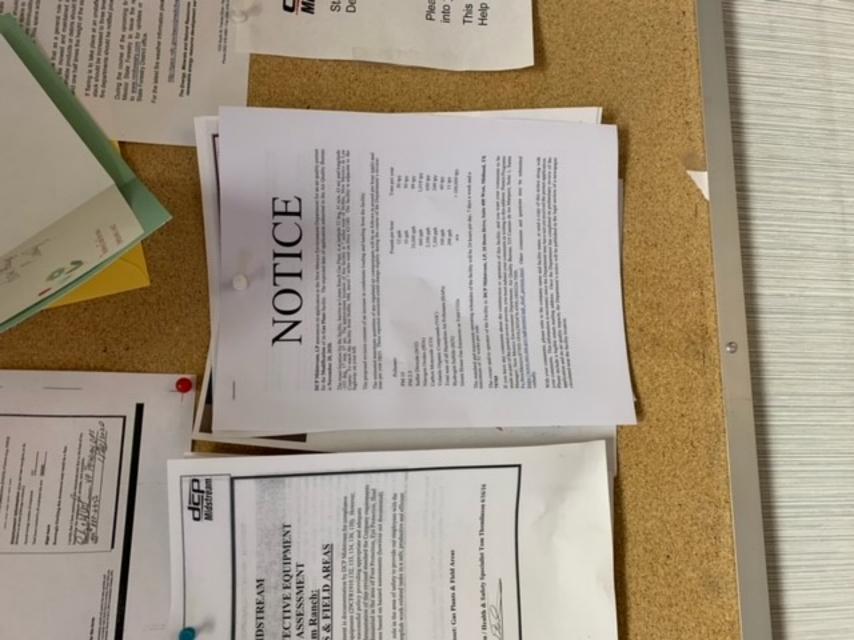
DCP Midstream, LP 10 Desta Drive, Suite 400 West Midland, TX, 79705

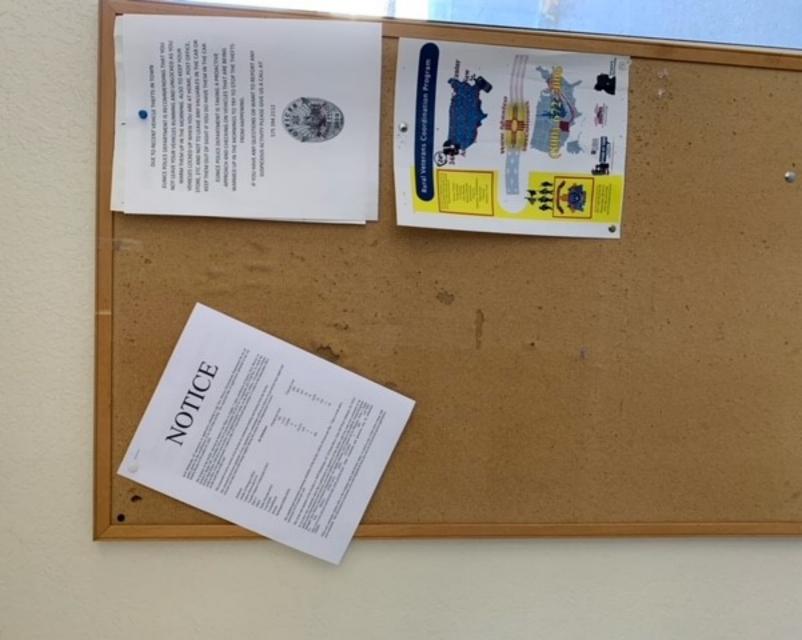
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# **General Posting of Notices – Certification**

posted a true and correct copy of the attached I	the undersigned, certify that on <b>November 19, 2020</b> , Public Notice in the following publicly accessible and County, State of New Mexico on the following dates:
1. Facility entrance, Eunice Gas Plant	{November 18, 2020}
2. Eunice City Library	{November 18, 2020}
3. Eunice Post Office	{November 18, 2020}
4. Hobbs Post Office	{November 18, 2020}
Signed this 19 day of November	2020
Signature Signature	11/19/2020 Date
Printed Name	
Environmental Engineer Title {APPLICANT OR RELATIONSHIP TO	APPLICANT}







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# NOTICE

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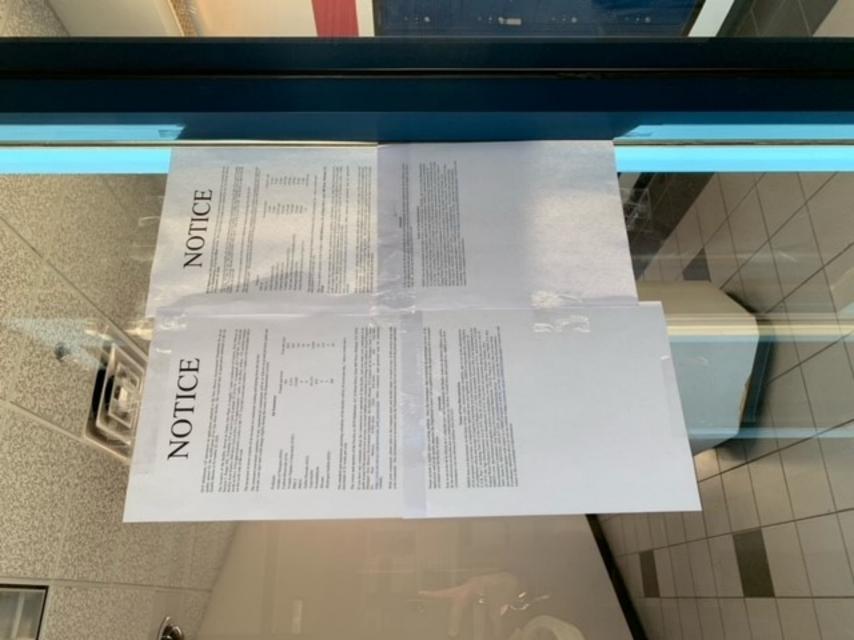
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# NOTICE

**DCP Midstream, LP** announces its application to the New Mexico Environment Department for an air quality permit for the **Modification** of its **Gas Plant** facility. The expected date of application submittal to the Air Quality Bureau is **November 20, 2020.** 

The exact location for the facility, known as Linam Ranch Gas Plant, is at latitude 32 deg, 41 min, 43 sec and longitude -103 deg, 17 min, 07 sec. The approximate location of this facility is 7 miles west of Hobbs, New Mexico in Lea County. To reach the facility from Hobbs, NM, travel 7 miles west on Hwy 62/180. The facility is adjacent to the highway on your left.

The proposed revision consists of an increase in condensate loading and hauling from the facility.

The estimated maximum quantities of any regulated air contaminants will be as follows in pound per hour (pph) and tons per year (tpy). These reported emissions could change slightly during the course of the Department's review:

Pollutant:	Pounds per hour	Tons per year
PM 10	12 pph	50 tpy
PM 2.5	10 pph	50 tpy
Sulfur Dioxide (SO2)	33,000 pph	99 tpy
Nitrogen Oxides (NOx)	660 pph	1,018 tpy
Carbon Monoxide (CO)	2,100 pph	650 tpy
Volatile Organic Compounds (VOC)	7,300 pph	249 tpy
Total sum of all Hazardous Air Pollutants (HAPs)	100 pph	60 tpy
Hydrogen Sulfide (H2S)	298 pph	11 tpy
Green House Gas Emissions as Total CO2e	n/a	> 100,000 tpy

The standard and maximum operating schedules of the facility will be 24 hours per day, 7 days a week and a maximum of 52 weeks per year.

The owner and/or operator of the Facility is: DCP Midstream, LP, 10 Desta Drive, Suite 400 West, Midland, TX 79705

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe,NewMexico;87505-1816;(505)476-4300;1800224-7009;

https://www.env.nm.gov/aqb/permit/aqb\_draft\_permits.html. Other comments and questions may be submitted verbally.

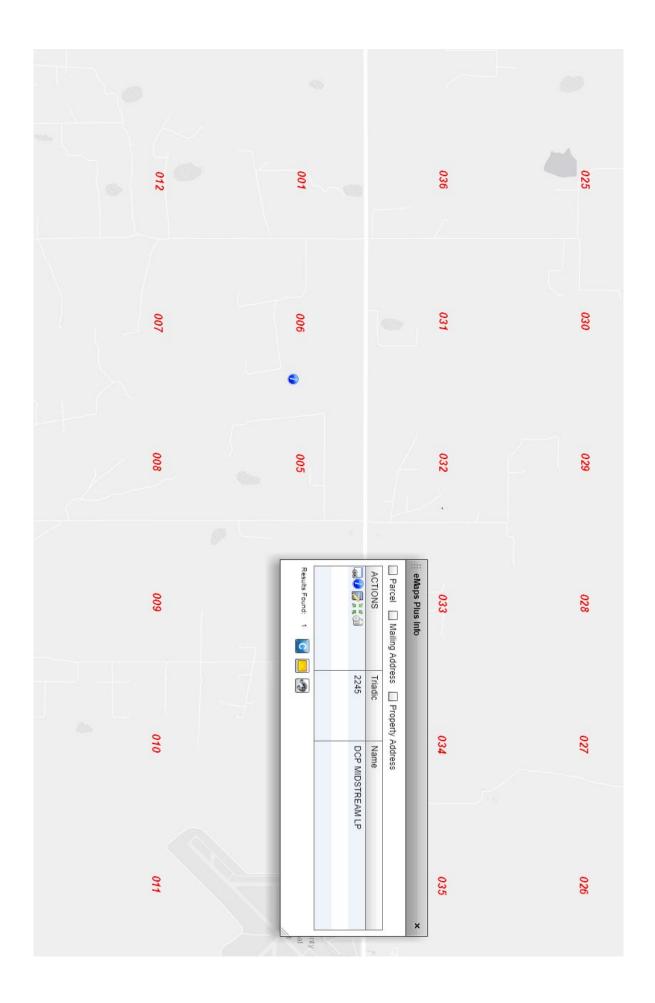
With your comments, please refer to the company name and facility name, or send a copy of this notice along with your comments. This information is necessary since the Department may have not yet received the permit application. Please include a legible return mailing address. Once the Department has completed its preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

#### Attención

Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-476-5557.

#### **Notice of Non-Discrimination**

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non- discrimination programs, policies or procedures, you may contact: Kristine Pintado, Non-Discrimination Coordinator, New Mexico Environment Department, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, nd.coordinator@state.nm.us. If you believe that you have been discriminated against with respect to a NMED program or activity, you may contact the Non-Discrimination Coordinator identified above or visit our website at <a href="https://www.env.nm.gov/NMED/EJ/index.html">https://www.env.nm.gov/NMED/EJ/index.html</a> to learn how and where to file a complaint of discrimination.

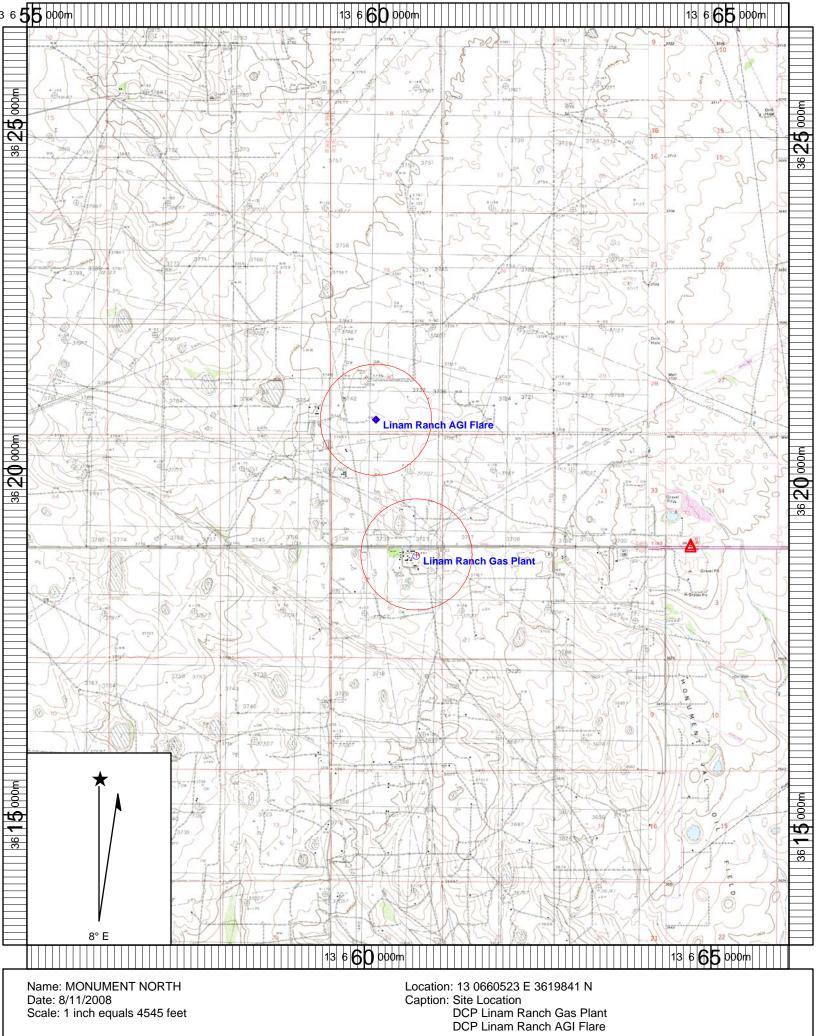




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# <u>Submittal of Public Service Announcement – Certification</u>

bublic service announcement to <b>KZOR 94.1 FM</b> that serves the City of <b>Hobbs and the surrounding areas</b> , <b>Lea County</b> , New Mexico, in which the source is or is proposed to be ocated and that <b>KZOR DID NOT RESPOND</b> .
Signed this 19th day of November, 2020
November 19, 2020 Date
Kavier Chavez
rinted Name
Associate Consultant
itle



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## Written Description of the Routine Operations of the Facility

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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.

Linam Ranch Plant is a natural gas processing plant permitted to process up to 225 MM standard cubic feet of natural gas per day. The natural gas processed at Linam Ranch is mostly methane, but contains other hydrocarbons heavier than methane that can be condensed into liquids in the plant. The gas also contains impurities including water, hydrogen sulfide, and carbon dioxide.

The plant consists of an Inlet Receiving System, Amine Treater, Acid Gas Injection well, Sulfur Recovery Unit, Inlet Compression and Dehydration System, Cryogenic/Turbo Expander Plant with external Propane Refrigeration, Residue Compression, and Product Sales for Residue Gas, NGL Liquids, Stabilized Oil, Slop Oil, and Molten Liquid Sulfur. Additionally, the Fuel Gas Systems, Instrument and Starting Air Systems, Steam Systems, Cooling Towers, ESD Flare, Acid Gas Flare, Acid Gas Injection Flare and Drain Systems are supporting units that aid the processes. Processing operations involve chemical reaction processes, thermodynamic processes and physical processes. The chemical reactions that take place are exothermic in nature; that is, they generate heat.

#### **Amine (DGA) Treating:**

Amine treating is used to remove H<sub>2</sub>S and CO<sub>2</sub> from the gas. This is known as the gas sweetening process. Amine treating is an exothermic chemical reaction process. The treating solution is made up DGA (<u>Diglycola</u>mine) in water solution. This aqueous mixture is regenerated and reused. Lean DGA solution is pumped to the top of the Contactor (trayed tower) and allowed to flow downward. Sour inlet gas is fed into the bottom of the Contactor and flows upward.

As lean DGA solution flows down through the Contactor, it comes into contact with the sour gas. The sour gas contains  $H_2S$  and  $CO_2$ , which react with the amine to form an amine sulfide complex and carbonate, i.e., the amine absorbs the  $H_2S$  and  $CO_2$  and is known as sour (rich) amine. The remaining gas is known as sweet gas and leaves the Contactor containing less than 4 ppm of  $H_2S$ .

Rich DGA solution leaves the bottom of the Contactor and is fed into a flash tank so any absorbed hydrocarbons can be flashed out of the liquid prior to amine regeneration. Due to weak chemical bonds between the sour gas components and the DGA, H<sub>2</sub>S and CO<sub>2</sub> can be stripped from the amine by heating up the amine at low pressures. Rich amine is fed into a stripper column known as a Still, which is operated at low pressure and high temperature. 45 # Steam is used to supply heat to the Still reboiler. H<sub>2</sub>S, and CO<sub>2</sub>, known as "acid gases", with small amounts of hydrocarbons and water vapors exit the top of the Still and normally routed to the Acid Gas Injection (AGI) well system. Alternately, during maintenance or upsets of the AGI system, the acid gas stream may be routed to the sulfur plant (SRU). The Lean DGA is now regenerated and leaves the stripper column to be cooled and recirculated to the Contactor.

#### Acid Gas Injection (AGI) System

Acid gas from the Amine Treating system routed to the AGI well located approximately 1½ miles north of the main Linam Ranch facility for injection into sub-surface strata. The acid gas consists of electrically-driven compressors, tanks and ancillary devices. During normal operation of the AGI system, a low volume of gas is flared at the AGI flare. Under upset conditions that require depressurization of the AGI system, the acid gas contained within the system may be flared.

#### Waste Heat Recovery Units and Boilers:

The Linam Ranch Plant (Volcano) Heat Recovery Unit is used to produce high pressure 250# steam from the Residue Turbine Exhaust. Additionally, two (2) fuel gas Fired Boilers producing 250# steam are available. This 250# steam is used primarily to operate the various Steam Driven Turbines throughout the plant. Some of the 250# Steam is used to supply heat for the stabilizer reboiler.

#### **Cooling Water System:**

Saved Date: 11/24/2020

The cooling water system is a thermodynamic process that provides cooling for process and utility services. Water is circulated from the South Cooling Tower to various heat exchangers and then back to the cooling tower. The North Cooling Tower is a 'Bay Tower' with cooling water circulated over exposed process coils.

To minimize corrosion, scaling, and fouling of plant equipment, chemicals are added to the cooling water. This chemical addition also helps control microbiological growth in the Cooling Towers, since these systems are open to the atmosphere and microbiological growth can be a problem.

#### **Stabilized Product System:**

The stabilized product system is a heat added process, which is used to reduce the vapor pressure of inlet condensate, and closed drain liquids. Inlet liquids are sent to the stabilizer feed tanks where their pressure is reduced to allow certain light hydrocarbons to flash off to the gathering system. From the stabilizer system feed tanks, the liquid condensate is fed to the stabilizer tower where the pressure is further reduced and the process is heated significantly to flash off more of the light hydrocarbons. Liquids are dumped to the stabilized condensate storage tanks and are pumped to a sales pipeline or shipped by truck.

Units TK-VRU and TK-VRUTMP are a combined group of 9 tanks with integrated vapor recovery units (VRU). The VRUs at the facility are inherent to the process and design of the facility. The VRUs are designed to recover vapors and return the vapors back into the low pressure gathering system.

#### Molecular Sieve Dehydration (Mole Sieve):

Process gas is dehydrated to prevent hydrate formation in the turbo expander process unit. Molecular sieve dehydration is a solid bed adsorption process used to remove moisture from the inlet gas.

There are four packed towers in the Linam Ranch system. Three towers are dehydrating gas while the other is being regenerated. The towers are packed with a molecular sieve desiccant. The Linam Ranch mole sieve is a Type 4A sieve (pore size) and does not slip minor amounts of  $H_2S$ . This trace contaminant of  $H_2S$  and Water Vapor are released from the mole sieve in the regeneration cycle.

The mole sieve is a crystalline aluminosilicate material selected for its ability to adsorb water. Water is removed from the gas due to a weak bonding reaction between the solid mole sieve desiccant and water. The bonding action generates only a small amount of heat. Fresh molecular sieve can adsorb about 10% of its weight in water.

Sweet gas compressed to about 660 psig flows from the top of the mole sieve packed tower to the bottom of the tower. As the gas flows downward, the mole sieve adsorbs water and other trace contaminants. The moisture content of the mole sieve is monitored and once it becomes saturated, it must be regenerated. Regeneration of a tower is accomplished by passing hot  $(450^{\circ}F+)$ -residue gas through the tower from the bottom to the top of the tower. The hot gas breaks the water/desiccant weak bond and absorbs the free water and removes it from the tower.

The regeneration (regen) gas is cooled downstream of the desiccant beds so absorbed water will condense and drop out of the regen gas stream. After the water is separated from the regen gas in a separator, the gas is further cooled in the Regeneration Gas Propane Chiller Unit to remove additional water vapors and then is compressed to the Residue Compression System and thence the gas goes to the residue gas sales stream.

#### **Cryogenic / TurboExpander Plant:**

The purpose of the Cryogenic Plant is to recover the natural gas liquids (NGL) from the Plant feed gas. The NGL product is composed of ethane and heavier hydrocarbons when the plant is operated in ethane recovery mode and the residue gas is mostly methane. The plant can also be operated in an ethane rejection mode where most of the ethane will be rejected from the NGL product and into the residue gas stream.

The inlet gas passes through the Dehydration Outlet Filters to remove solid particles that can potentially plug downstream equipment. The inlet gas is then split into two streams. The first stream goes to the Inlet Gas Chiller and the second goes to the Demethanizer Reboiler. The main inlet gas stream enters the Inlet Gas Chiller, which is a multiple stream, brazed aluminum plate-fin exchanger. Physically, the exchanger is combined with the Reflux Condenser. The inlet gas is cooled to -60 °F by cross exchanging with the residue gas, and with propane refrigerant. The other portion of the inlet gas stream enters the Demethanizer Reboiler, which is a multiple stream, brazed aluminum plate-fin exchanger. The inlet gas is cooled to -76 °F by cross exchanging with the Demethanizer bottom liquid product, reboiling the Demethanizer liquids, and heating the liquid stream from the Expander Inlet Separator. The chilled inlet gas stream is then combined with the inlet gas from the outlet of the Inlet Gas Chiller.

The combined stream enters the Expander Inlet Separator where the condensed liquids are separated from the vapors. The vapors flow to the Turbo Expander and the liquid flows to the Liquid Gas Exchanger. The gas enters the Turbo Expander and the pressure is let down isentropically to about 170 psig. The energy released from the expansion, 2150 BHP, is used to drive the Booster Compressor. The expansion process cools the gas to -150 °F. In the event that the Turbo Expander/Booster Compressor is removed from service, flow can be bypassed around the unit by using the J-T valve to throttle the pressure. After the Turbo Expander, the inlet gas enters the Demethanizer. The liquid from the Expander Inlet Separator flows through the Liquid Gas Exchanger to the Cold Gas Separator.

In the Cold Gas Separator, the vapor is separated from the liquid. The liquid flows to the Demethanizer and the vapors flow to the Reflux Condenser. In the Reflux Condenser, the vapors from the Cold Gas Separator are condensed to provide reflux at the top section of the Demethanizer using cold residue gas from the overhead of the Demethanizer. The exchanger is a brazed aluminum plate-fin exchanger and is physically attached to the Inlet Gas Chiller.

The Demethanizer accomplishes the separation of the inlet gas into the residue gas and NGL product that meets the required specifications. The residue gas leaves as column overhead and is composed mostly of methane. In the ethane rejection mode the residue gas will contain an increased amount of ethane and propane. The NGL product, which is composed of ethane and heavier hydrocarbons, leaves as the column bottoms. During ethane rejection most of the Demethanizer reboiler passes will be bypassed and the Demethanizer Trim Reboiler will be the operational reboiler. The Demethanizer Trim Reboiler is a once through reboiler using condensing 45# steam. From the Demethanizer the residue gas flows to the Reflux Condenser and the NGL product flows to the Demethanizer Bottoms Transfer Pumps.

From the Demethanizer, the NGL is pumped by the Demethanizer Bottoms Pump to the NGL Product Heater. During ethane rejection the NGL bypasses the NGL Product Heater and goes directly to the NGL Storage Tank. The residue gas flows to the Reflux Condenser and the Inlet Gas Chiller where the residue gas is heated by the Inlet gas stream. During ethane rejection there will not be a vapor flow coming from the Cold Gas Separator, but the residue gas will still flow through the Reflux Condenser.

The residue gas enters the Booster Compressor where it is compressed to 215 psig. The gas flows to the Booster Compressor Aftercooler, a forced draft air cooled exchanger. A side stream is taken off at the discharge of the Booster Compressor as warm regen gas that goes to the Regeneration Gas Heater. Downstream of the Booster Compressor Aftercooler part of the residue gas is taken for fuel gas to run the plant. Further downstream, past the existing Cooling Tower, a side stream is taken as cool regeneration gas to the Dehydrators with the remainder of the residue gas continuing on to the Residue Compression System.

#### **Propane Refrigeration System:**

The purpose of the Propane Refrigeration System is to provide the additional refrigeration required at the Inlet Gas Chiller to achieve high ethane recoveries at the cryogenic plant. The refrigeration system also supplies refrigeration duty to the Regen Gas Chiller to cool the regen gas to achieve the required water specification on the residue gas and to the Refrigeration Compressor Lube Oil Cooler. Refrigeration is supplied at -37 °F and at 18 °F for the Inlet Gas Chiller and at 40 °F for the Regen Gas Chiller.

#### Water Wash System:

A 200-MMscfd Water Wash System is operating at the facility. The process makes use of the existing utilities including electrical power, steam, cooling water, plant and acid gas flare(s), and instrument air. All heat trace are sourced from the 40# steam system. A stand-alone Reverse Osmosis water treatment system was installed as part of this project to provide make-up water for the Water Wash System and replacement Boilers. Waste water from the Still Reflux Accumulator and Still Bottoms are dumped to the existing water holding tanks (referred to as the "A" Tanks). Vapors from the Still Inlet Surge Tank and Reflux Accumulator discharge to the low pressure gathering system or to the existing plant flare if the gathering system is inaccessible. NGL from the Still Inlet Surge Tank and Reflux Accumulator are dumped to a battery of existing holding tanks (referred to as the "B" Tanks). In general, lighter than air releases are vented to the atmosphere and heavier than air releases are vented to the Plant Flare. Blanket gas to the Still Inlet and Bottoms Surge Tanks are sourced from the Residue System.

# **Section 11**

#### **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, Single Source Determination Guidance, 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):

В.	Apply the 3 criteria for determining a single source:
	<u>SIC</u> <u>Code</u> : Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, <u>OR</u> surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.
	belong to different 2-digit Sie codes are support facilities for this source.
	☑ Yes □ No
	<u>Common Ownership or Control</u> : Surrounding or associated sources are under common ownership or control as this source.
	☑ Yes □ No
	<u>Contiguous</u> <u>or Adjacent</u> : Surrounding or associated sources are contiguous or adjacent with this source.
	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, <u>does not</u> 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**

# Section 12.A PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

A PSD applicability determination for all sources. 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 EPA New Source Review Workshop Manual to determine if the revision is subject to PSD review.

#### A. This facility is:

- □ a minor PSD source before and after this modification (if so, delete C and D below).
   □ a major PSD source before this modification. This modification will make this a PSD minor source.
   ☑ an existing PSD Major Source that has never had a major modification requiring a BACT analysis.
   □ an existing PSD Major Source that has had a major modification requiring a BACT analysis
- B. This facility is not one of the listed 20.2.74.501 Table 1 PSD Source Categories. The "project" emissions for this modification are not significant. The increase in VOC and PM emission are less than the significant thresholds reported in 20.2.74.502 Table 2. The "project" emissions listed below only result from changes described in this permit application, thus no emissions from other revisions or modifications, past or future to this facility. De-bottlenecking will not occur with this modification. The project emissions (before netting) for this project are as follows:
  - a. NOx: -- TPY
    b. CO: -- TPY
    c. VOC: 2.95 TPY
    d. SOx: -- TPY
    e. PM: 0.37 TPY
    f. PM10: 0.37 TPY
    g. PM2.5: 0.050 TPY
    h. Fluorides: -- TPY
    i. Lead: -- TPY
  - j. Sulfur compounds (listed in Table 2): -- TPY

a new PSD Major Source after this modification.

k. GHG: -- TPY

		NOx	CO	VOC	$SO_2$	$PM_{10}$	PM <sub>2.5</sub>
	Unit No.	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)
	LOAD-STAB	-	-	-	-	-	-
Baseline Actual Emissions	LOAD-UNS	-	-	-	-	-	-
	HAUL	-	-	-	-	-	-
	LOAD-STAB	-	-	2.95	-	-	-
Projected Actual Emissions	LOAD-UNS	-	-	5.77E-04	-	-	-
	HAUL	-	-	-	-	0.37	0.050
Increase from Previous	LOAD-STAB	-	-	2.95	-	-	-
Permitting Action	LOAD-UNS	-	-	5.77E-04	-	-	-
Fermitting Action	HAUL	-	-	-	-	0.37	0.050
PSD Significance Thr	esholds	40	100	40	40	15	10
Are Project Emissions S	ignificant?	No	No	No	No	No	No

- C. Netting is not required as this is a new project.
- D. BACT is not required for this modification, as this application is a minor modification.
- E. This is an existing PSD major source. This modification is not related to any other permit modifications and is considered to be a single project. As the emissions for this project are less than the significance levels reported in 20.2.74.502 Table 2, a PSD modification is not triggered.

# **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/

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this attachment on this page.

Form-Section 13 last revised: 5/29/2019 Section 13, Page 1 Saved Date: 2/2/2021

**Example of a Table for STATE REGULATIONS:** 

STATE REGU-	Title	Applies? Enter	Unit(s) or Facility	JUSTIFICATION:
LATIONS CITATION		Yes or No		(You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. The facility meets maximum allowable concentrations of particulates, SO <sub>2</sub> , H <sub>2</sub> S, NOx, and CO under this regulation.
20.2.7 NMAC	Excess Emissions	Yes	Facility	This regulation establishes requirements for the facility if operations at the facility result in any excess emissions. The owner or operator will operate the source at the facility having an excess emission, to the extent practicable, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. The facility will also notify the NMED of any excess emission per 20.2.7.110 NMAC.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	This facility does not have existing gas burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.33.108 NMAC.
20.2.34 NMAC	Oil Burning Equipment: NO <sub>2</sub>	No	N/A	This facility does not have oil burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.34.108 NMAC.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	Yes	Facility	This facility is subject to the requirements of NMAC 2.35 for "New Natural Gas Processing Plants for which a modification commenced on or after July 1, 1974". This facility meets the requirements established under 20.2.35.100.A-D NMAC.
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	N/A	N/A	These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.
20.2.38 NMAC	Hydrocarbon Storage Facility	Yes	TK-VRU and TK- VRUTMP	This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This regulation establishes sulfur emission standards for sulfur recovery plants which are not part of petroleum or natural gas processing facilities. This regulation does not apply as 20.2.35 NMAC applies.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	Facility	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC). This facility was subject to the repealed regulation 20.2.37 NMAC; therefore it is now subject to 20.2.61 NMAC.
20.2.70 NMAC	Operating Permits	Yes	Facility	This regulation establishes requirements for obtaining an operating permit. This facility is a major source of NOx, CO, and VOC and complies by operating under Title V Permit P094-M2.
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This regulation establishes a schedule of operating permit emission fees. The facility is subject to 20.2.70 NMAC and is therefore subject to requirements of this regulation.
20.2.72 NMAC	Construction Permits	Yes	Facility	This regulation establishes the requirements for obtaining a construction permit. The facility is a stationary source that has potential emission rates great than 10 pounds per hour or 25 tons per year of any regulated air contaminant for which there is a National or New Mexico Air Quality Standard. The facility has a construction permit (NSR Permit) 0039-M7 to meet the requirements of this regulation.

DCP Operating Company, LP

STATE REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:  (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	This regulation establishes emission inventory requirements. The facility meets the applicability requirements of 20.2.73.300 NMAC. The facility will meet all applicable reporting requirements under 20.2.73.300.B.1 NMAC.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	Yes	Facility	This regulation establishes requirements for obtaining a PSD permit. This facility is a major source for PSD purposes and is in compliance with the applicable requirements of this regulation.
20.2.75 NMAC	Construction Permit Fees	No	N/A	This regulation establishes the guidelines and requirements for construction permitting fees. This facility is subject to 20.2.72 NMAC and is in turn subject to 20.2.75 NMAC. This facility is exempt from annual fees under this part (20.2.75.11.E NMAC) as it is subject to fees pursuant to 20.2.71 NMAC.
20.2.77 NMAC	New Source Performance	Yes	2, 4A, 28, 29, 30, 31 32B, 34, 36, 37, FUG, AM-10, TK-VRU and TK- VRUTMP	The facility is subject to this regulation as this is a stationary source which is subject to the requirements of 40 CFR Part 60, as amended through January 15, 2017. The following regulations apply:  • Subpart A  • Unit 2  • Unit 4A  • Subpart Dc  • 34, 36, and 37  • Subpart GG  • 29-31  • 32B  • Subpart Kb  • TK-VRU  • TK-VRUTMP  • Subpart KKK  • FUG  • Subpart KKKK  • FUG  • Subpart KKKK  • 28  • Subpart OOOO  • Equipment added in NSR 0039-M6  • 28  • AM-10
20.2.78 NMAC	Emission Standards for HAPS	Yes (Potentially)	Facility	This regulation applies to all sources subject to a 40 CFR 60 regulation, as amended through January 15, 2017. Although this standard does not apply to this facility under routine operating conditions, in the case of asbestos demolition, Subpart M would apply.
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	This regulation establishes the requirements for obtaining a nonattainment area permit. The facility is not located in a non-attainment area and therefore is not subject to this regulation.
20.2.80 NMAC	Stack Heights	No	N/A	This regulation establishes requirements for the evaluation of stack heights and other dispersion techniques. This regulation does not apply as all stacks at the facility follow good engineering practice.
20.2.82 NMAC	MACT Standards for source categories of HAPS	Yes	6-11, 28, 34, 36, 37, DH-10	This regulation established state authority to implement MACT Standards for source categories of HAPs. This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63, as amended through January 15, 2017. The following regulations apply:  • Subpart HH  • DH-10  • Subpart YYYY  • 28  • Subpart ZZZZ  • 6-11  • Subpart DDDDD  • 34, 36, and 37

Table for Applicable FEDERAL REGULATIONS (Note: This is not an exhaustive list):

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:	
40 CFR 50	NAAQS	Yes	Facility	This regulation defines national ambient air quality standards. The facility meets all applicable national ambient air quality standards for $NO_x$ , $CO$ , $SO_2$ , $H_2S$ , $PM_{10}$ , and $PM_{2.5}$ under this regulation.	
NSPS 40 CFR 60, Subpart A	General Provisions	Yes	2, 4A, 28, 29, 30, 31 32B, 34, 36, 37, FUG, AM-10, TK-VRU and TK- VRUTMP	This regulation defines general provisions for relevant standards that have been set under this part. The facility is subject to this regulation because the following subparts apply:  • Subpart A  • Unit 2  • Unit 4A  • Subpart Dc  • 34, 36, and 37  • Subpart GG  • 29-31  • 32B  • Subpart Kb  • TK-VRU  • TK-VRUTMP  • Subpart KKK  • FUG  • Subpart KKKK  • EUG  • Subpart KKKK  • EUG  • Subpart OOOO  • Equipment added in NSR 0039-M6  • 28  • AM-10	
NSPS 40 CFR60.40a, Subpart Da	Subpart Da, Performance Standards for Electric Utility Steam Generating Units	No	N/A	This regulation establishes standards of performance for electric utility steam generating units. This regulation does not apply because the facility does not operate any electric utility steam generating units.	
NSPS 40 CFR60.40b Subpart Db	Electric Utility Steam Generating Units	No	N/A	This regulation establishes standards of performance for industrial-commercial-institutional steam generating units. There are no steam generating units that commenced construction, modification, or reconstruction after June 19, 1984, and that have a heat input capacity greater than 100 MMBtu/hr at the facility.	
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units	Yes	34, 36, and 37	This regulation establishes standards of performance for small industrial-commercial-institutional steam generating units. Units 34, 36, and 37 will be installed or modified after June 9, 1989 with a heat input capacity greater that or equal to 10 MMbtu/hr but less than 100 MMbtu/hr. The units will only be natural gas and therefore will not be subject to performance tests, reporting requirements, or emission limits under this regulation. The facility will follow all record keeping requirements for these units.	

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
NSPS 40 CFR 60, Subpart Ka	/ I RECONSTRUCTION OF T		N/A	This regulation establishes standards of performance for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. The tanks at the facility commenced construction after the July 23, 1984 regulation date and are therefore not subject to this regulation.  Note: The two (2) Condensate Tanks controlled by the VRU which have a capacity of 1,500 bbl were built by 1954, thus they are also exempted from this regulation.
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	Yes	TK-VRU, TK- VRUTM P	This facility has storage vessels with a capacity greater than or equal to 75 cubic meters (m³) that are used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. However TK39-41, TK44-48 and TK53,54 are pressure vessels and pursuant to \$60.110b(d)(2) are not subject to this subpart.  TK-VRU and TK-VRUTMP  As discussed under Section 10 of this permit application, this facility operates a combine group of nine (9) tanks that ranges from 210 to 1,500 bbl (33.39 to 238.5 m³) that are part of the vapor recovery units. From these nine tanks, two tanks, one of 210 bbl and one of 400 bbl, have capacity lower than the threshold of 75 m³, thus they are exempted to comply with this regulation.  The five (5) 750 bbl tanks are covered under this regulations since they were installed after July 23, 1984, implementation date, and they have a capacity equivalent to 119.2 m³.  The remainder two (2) 1,500 bbl tanks were installed in 1954 and are also covered with this regulation since these tanks used to be pressurized tanks that were modified to be atmospheric tanks after the date this rule was implemented.  Note: The VRUs at the facility are inherent to the process and design of the facility. The VRUs are designed to recover vapor and return the vapors back into the low pressure gathering system. The tanks that meet this capacity and date of construction date are subject to this regulations and compliant with this subpart because VOC emissions are routed to a VRU with 95% efficiency.
NSPS 40 CFR 60.330 Subpart GG	Stationary Gas Turbines	Yes	29, 30, 31 and 32B	This regulation establishes standards of performance for certain stationary gas turbines. The turbines at Linam Ranch all have heat inputs greater than the 10 MMBtu/hour were installed on after the October 3, 1977 applicability date and prior to February 18, 2005.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from Onshore Gas Plants	Yes	Facility	Linam Ranch is an affected facility as it is an onshore natural gas processing plant that commenced construction, reconstruction, or modification after January 20, 1984. The group of all equipment (each pump, pressure relief device, open-ended 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 (definied in § 60.631) within a process unit is an affected facility. 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 this subpart.  Linam Ranch has instituted a Leak Detection and Repair program and submits reports twice annually.

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO <sub>2</sub> Emissions	Yes	Facility	This regulation establishes standards of performance for SO <sub>2</sub> emissions from onshore natural gas processing for which construction, reconstruction, or modification of the amine sweetening unit commenced after January 20, 1984 and on or before August 23, 2011.  The sweetening units produce acid gas that is completely re-injected into geologic strata or that is otherwise not released to the atmosphere; pursuant to §60.640(e) the sweetening units are not subject to this subpart.
NSPS 40 CFR Part 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 before September 18, 2015	Yes	Equipment leaks associate with equipment added in NSR 0039-M6, 28, AM- 10	This regulation establishes emission standards and compliance schedule for the control of volatile organic compounds (VOC) and sulfur dioxide (SO <sub>2</sub> ) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The following are equipment constructed after August 23, 2011 and subject to this regulation: Turbine (Unit 28), and equipment leaks associated with the equipment added in NSR 0039-M6R1.  The acid gas from the amine unit (sweetening unit) at the facility is completely injected into oil or gas-bearing geological strata (AGI wells) and is not subject to 60.5405 through 60.5407, 60.5410(g), and 60.5423 of this subpart [per NSPS OOOO 60.5365(g)(4)]. When the acid gas flare is used during planned SSM and, the acid gas is not sent to the AGI wells, the facility is subject to SO <sub>2</sub> standards for the amine unit. Since the flare will be used as a control device during planned SSM, the flare is subject to NSPS 60.18. The facility will comply with this regulation upon startup.  The pneumatic devices located at the facility are not continuous bleed and therefore will not have applicable requirements under this regulation.  The tanks are subject to NSPS Kb and are therefore not subject to this regulation.
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	No	N/A	This regulation establishes standards of performance for crude oil and natural gas production, transmission and distribution. The facility does not have any affected units that have been modified or reconstructed on or after <b>September 18, 2015.</b>
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary compression ignition internal combustion engines. All engines at this facility commenced construction prior to July 11, 2005. This regulation does not apply.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary spark ignition internal combustion engines. All engines at this facility commenced construction prior to June 12, 2006. This regulation does not apply.
NSPS 40 CFR Part 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines	Yes	28	This regulation establishes standards of performance for new stationary gas turbines. Unit 28 is subject to this regulation as the unit commenced construction after February 18, 2005.

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:	
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	This facility does not have any affected equipment; therefore, this subpart does not apply.	
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	This facility does not have any affected equipment; therefore, this subpart does not apply.	
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	This facility does not have any affected equipment; therefore, this subpart does not apply.	
NESHAP 40 CFR 61 Subpart A	General Provisions	Yes (Potentially)	Facility	This part applies to the owner or operator of any stationary source for which a standard is prescribed under this part. There is one potentially applicable NESHAP. (See discussion of 40 CFR 61, part M below.)	
NESHAP 40 CFR 61 Subpart E	National Emission Standards for Mercury	No	N/A	The provisions of this subpart are applicable to those stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge. This subpart does not apply.	
NESHAP 40 CFR 61 Subpart M	National Emission Standards for <b>Asbestos</b>	Yes (Potentially)	Facility	Although this standard does not apply to this facility under routine operating conditions, in the case of <b>asbestos</b> demolition, Subpart M would apply.	
NESHAP 40 CFR 61 Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	No	N/A	This regulation establishes national emission standards for equipment leaks (fugitive emission sources). The facility does not have equipment that operates in volatile hazardous air pollutant (VHAP) service [40 CFR Part 61.240]. The regulated activities subject to this regulation do not take place at this facility. The facility is not subject to this regulation.	
MACT 40 CFR 63, Subpart A	General Provisions	Yes	6-11, 28, 34, 36, 37, DH- 10	This regulation defines general provisions for relevant standards that have been set under this part. This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63, as amended through August 29, 2013. The following subparts apply:  • Subpart HH  • DH-10  • Subpart YYYY  • 28  • Subpart ZZZZ  • 6-11  • Subpart DDDDD  • 34, 36, and 37	
MACT 40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	Yes DH-10  Yes DH-10  According "storage ve (GOR) is lechanges at of "storage"		This regulation establishes national emission standards for hazardous air pollutan from oil and natural gas production facilities. The glycol contactor added to the dehydration process to regulate moisture with the existing regenerator gas system and is subject to Subpart HH but exempt from requirements due to emissions less than 1.0 Mg/yr benzene.  According to current estimates, the storage tanks do not meet the definition of "storage vessels with the potential for flash emissions" since the gas-to-oil-rat (GOR) is less than 0.31 m <sup>3</sup> /1 (40 CFR 63.761). If the GOR of the storage tank changes at the facility and the tanks are later determined to meet the definition of "storage vessels with the potential for flash emissions" given in Subpart HI DCP will comply with applicable requirements.	

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
MACT 40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities	No	N/A	This subpart 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. This facility is not a natural gas transmission and storage facility as defined in this subpart. This regulation does not apply.
MACT 40 CFR 63 Subpart YYYY	NESHAP for Stationary Combustion Turbines	Yes	28	This subpart sets national emission standards for new stationary combustion turbines. Units 29, 30, 31 and 32B are existing units and pursuant to \$63.6090(b)(4) have no requirements under this subpart or subpart A.  Unit 28 is a new or reconstructed gas-fired combustion turbine. Pursuant to \$63.6095(d), this unit is subject to the initial notification requirements set forth in \$63.6145 but need not comply with any other requirement of Subpart YYYY until final action on compliance by the EPA is taken.
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	Yes	34, 36, and 37	The facility is a major source of HAPS. Units 34, 36 and 37 will be subject to MACT 40 CFR 63 Subpart DDDDD as they will be constructed after the June 4, 2010 applicability date. The boilers will be combusting natural gas and will have the following compliance requirement in MACT DDDDD:  Per 63.7540 (a)(10) - Tune up every year (except for boilers and process heaters with continuous oxygen trim system which conduct a tune-up every 5 years).  Units 34, 36, and 37 do not have emission limits under this regulation.  DCP will comply with all applicable MACT DDDDD requirements.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No	N/A	This facility does not have any affected equipment; therefore, this subpart does not apply.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	6-11	This regulation defines national emissions standards for HAPs for stationary Reciprocating Internal Combustion Engines. These engines are subject to MACT ZZZZ but have no requirements as they are existing 2 stroke lean burn engines which are less than 500 horsepower located at a major source of HAPs [§63.6600(c)]
40 CFR 64	Compliance Assurance Monitoring	Yes	AM-10	The sulfur recovery unit (Unit 5) has been removed and is no longer subject to CAM.  The amine unit (Unit AM-10) is a controlled major source and is subject to CAM.  Units TK-VRU and TK-VRUTMP are a combined group of 9 tanks with integrated vapor recovery units (VRU). The VRUs at the facility are inherent to the process and design of the facility and are not subject to CAM. The VRUs are designed to recover vapors and return the vapors back into the low pressure gathering system.

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:	
40 CFR 68	Chemical Accident Prevention	Yes	Facility	This facility has quantities of materials regulated by this requirement that are in excess of the triggering threshold. A RMP has been submitted to and approved by the EPA on 6/29/2015	
Title IV – Acid Rain 40 CFR 72	Acid Rain	No	N/A	This part establishes the acid rain program. This part does not apply because the facility is not covered by this regulation [40 CFR Part 72.6].	
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions	No	N/A	This part establishes the acid rain program. This part does not apply because the facility is not covered by this regulation.	
Title IV-Acid Rain 40 CFR 75	Continuous Emissions Monitoring	No	N/A	This part establishes the acid rain program. This part does not apply because facility is not covered by this regulation.	
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program	No	N/A	This facility has quantities of materials regulated by this requirement that are excess of the triggering threshold. A RMP has been submitted to and approve by the EPA on 6/29/2015	
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	Yes	Facility	DCP owns appliances containing CFCs and is therefore subject to this requirement. DCP uses only certified technicians for the maintenance, servepair and disposal of appliances and maintains the appropriate records for requirement.  Note: Disposal definition in 82.152: Disposal means the process leading to including: (1) The discharge, deposit, dumping or placing of any discarded appliance into or on any land or water; (2) The disassembly of any appliant for discharge, deposit, dumping or placing of its discarded component part or on any land or water; or (3) The disassembly of any appliance for reuse component parts. "Major maintenance, service, or repair means" any maintenance, service, or repair that involves the removal of any or all of th following appliance components: compressor, condenser, evaporator, or auxiliary heat exchange coil; or any maintenance, service, or repair that involves uncovering an opening of more than four (4) square inches of "floarea" for more than 15 minutes.	
CAA Section 112(r)	Chemical Accident Prevention Provisions	Yes	Facility	Linam Ranch is subject to the chemical accident prevention provisions of the Clean Air Act.	

# **Section 14**

Linam Ranch Gas Plant

# **Operational Plan to Mitigate Emissions**

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

	<b>Title V Sources</b> (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.
	•
$\checkmark$	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 <b>Operational Plan to Mitigate Source Emissions</b>
	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.
abla	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.

DCP Operating Company, LP has developed an Operational Plan to Mitigate Source Emission during Malfunction, Startup or Shutdown as required by 20.2.72.203.A.5 NMAC. This plan is available at the project site for evaluation and review.

## **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.

#### Scenario A

This is the primary operating scenario. Under Scenario A of one (1) of the four (4) HBAs (Units 8 to 11) is operating at any given time, while simultaneously being allowed to operate all other equipment at the facility at maximum capacity without limits on the hours of operation.

#### Scenario B

This is the alternative operating scenario. Under Scenario B, two (2) of the four (4) HBAs (Units 8 to 11) would operate when one of the TLA engines (Units 6 and 7) is down. In order to preserve the PSD netting result for  $NO_x$  and VOC, the number of hours this scenario is allowed to run is up to 3,400 hours in any rolling 12-month period.

If DCP exceeds this threshold, DCP must perform an updated PSD netting analysis for these pollutants to show that the SERs were not exceeded based on actual hours of operation in each rolling 12-month period.

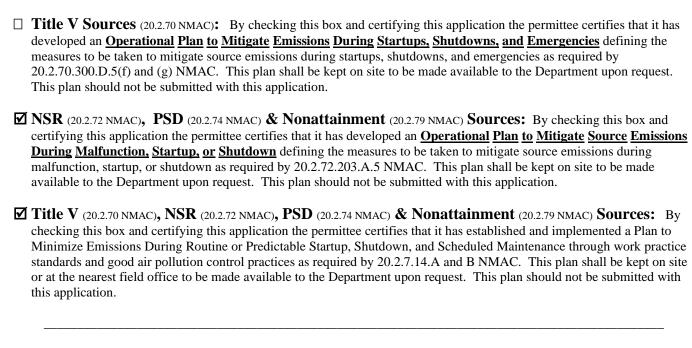
The following formula shall be used to calculate tons per year emissions for each HBA (Units 8 to 11) and TLA (Units 6 and 7). The sum of each of the HBA (Units 8 to 11) and TLA (Units 6 and 7) emissions calculated by the formula is then compared to the limits shown in Table 2-E of this application. The sum should be less than or equal to these limits to demonstrate that the SERs for NOx and VOC were not exceeded.

Formula to calculate emissions for NOx and VOC, in tons, for a given HBA or TLA unit over a rolling 12-month period:

[Permit Limit (lb/hr)] x [Rolling 12-month hours of operation (hr)] x [Actual power (hp) ÷ Permitted power (hp)] 2000 (lb/ton)

# **Operational Plan to Mitigate Emissions**

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)



DCP Operating Company, LP has developed an Operational Plan to Mitigate Source Emission during Malfunction, Startup or Shutdown as required by 20.2.72.203.A.5 NMAC. This plan is available at the project site for evaluation and review.

Saved Date: 11/24/2020

## **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.

#### Scenario A

This is the primary operating scenario. Under Scenario A of one (1) of the four (4) HBAs is operating at any given time, while simultaneously being allowed to operate all other equipment at the facility at maximum capacity without limits on the hours of operation.

#### Scenario B

This is the alternative operating scenario. Under Scenario B, two (2) of the four (4) HBAs would operate when one of the TLA engines is down. In order to preserve the PSD netting result for  $NO_x$  and VOC, the number of hours this scenario is allowed to run is up to 3,400 hours in any rolling 12-month period.

If DCP exceeds this threshold, DCP must perform an updated PSD netting analysis for these pollutants to show that the SERs were not exceeded based on actual hours of operation in each rolling 12-month period.

The following formula shall be used to calculate tons per year emissions for each HBA and TLA. The sum of each of the HBA and TLA emissions calculated by the formula is then compared to the limits shown in Table 2-E of this application. The sum should be less than or equal to these limits to demonstrate that the SERs for NOx and VOC were not exceeded.

Formula to calculate emissions for NOx and VOC, in tons, for a given HBA or TLA unit over a rolling 12-month period:

[Permit Limit (lb/hr)] x [Rolling 12-month hours of operation (hr)] x [Actual power (hp) ÷ Permitted power (hp)] 2000 (lb/ton)

Saved Date: 11/24/2020

Then, for NO<sub>x</sub> and VOC, calculate the sum:

Then, compare the sum "Total All Units" for each pollutant to the corresponding tons per year limit shown in Table 2-E.

Saved Date: 11/24/2020

# **Section 16**

# **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">http://www.env.nm.gov/aqb/permit/app</a> form.html) 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).	X
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 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.	

Check each box tha	at app	lies:
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Ш	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.
$\overline{\mathbf{V}}$	No modeling is required.

# **Section 17**

# **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.

To save paper and to standardize the application format, delete this sentence and the samples in the Compliance Test History Table, and begin your submittal for this attachment on this page.

**Compliance Test History Table** 

Unit No.	Test Description	Test Date
		10/17/2017
		12/11/2018
6	Tested using portable emission analyzer in accordance with NSR Permit	3/26/2019
	0039-M7 Condition A201.B	4/8/2020
		9/9/2020
	Tested using portable emission analyzer in accordance with NSR Permit 0039-M7 Condition A201.B	12/11/2018
7		3/26/2019
		6/10/2020
		9/9/2020
8	Tested using portable emission analyzer in accordance with NSR Permit	2/19/2014
8	0039-M7 Condition A201.B	Unit out of service
9	Tested using portable emission analyzer in accordance with NSR Permit	4/10/2013
9	0039-M7 Condition A201.B	Unit out of service
	Tested using portable emission analyzer in accordance with NSR Permit	3/1/2017
10	0039-M7 Condition A201.B	12/11/2018
	0039-W1/ Colldition A201.B	3/26/2019
	Tested using portable emission analyzer in accordance with NSR Permit	10/19/2017
11	0039-M7 Condition A201.B	12/11/2018
	0039-W/ Colldition A201.B	12/9/2019
		2/20/2017
28	Tested using portable emission analyzer in accordance with NSR Permit	3/21/2018
	0039-M7 Condition A205.A	3/13/2019
		4/7/2020
29		2/20/2017
	Tested using portable emission analyzer in accordance with NSR Permit	3/20/2018
2	0039-M7 Condition A205.A	3/20/2019
		4/6/2020
30		3/1/2017
	Tested using portable emission analyzer in accordance with NSR Permit	8/20/2018
	0039-M7 Condition A205.A	3/20/2019
		4/6/2020
31a 32b		3/1/2017
	Tested using portable emission analyzer in accordance with NSR Permit	3/20/2018
	0039-M7 Condition A205.A	3/20/2019
	_	4/7/2020
	Tracked union monthly amining analysis in accordance (id. NGD Description)	10/19/2017
	Tested using portable emission analyzer in accordance with NSR Permit	10/10/2018
	0039-M7 Condition A205.A	10/10/2019
		10/1/2020

#### **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.

There is no other relevant information.

# **Section 22: Certification**

Company Name: DCP midstream	
I, Hyung Hone, hereby certify to and as accurate as possible, to the best of my knowledge and p	hat the information and data submitted in this application are true professional expertise and experience.
Signed this 9 day of November, 2020, upon	my oath or affirmation, before a notary of the State of
·	
*Signature	11/19/2020 Date
Hyung Hong Printed Name	Environmental Engineer Title
Scribed and sworn before me on this 19 day of Novem	bet . 2020.
My authorization as a notary of the State of NEW Yor	expires on the
8 day of January, 3	4022.
Notary's Signature  Amile Taylo R	Date  CAMILE TAYLOR  NOTARY PUBLIC, STATE OF NEW YORK  Registration No. 01TA6137717  Qualified in Nassau County
Notary's Printed Name	Commission Expires January 8, 2022

<sup>\*</sup>For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC.