Phone: (801) 294-3024

inewby@cirrusllc.com

June 14, 2022

Elizabeth Bisbey-Kuehn New Mexico Environment Department Air Quality Bureau 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico 87505-1816

Re: Application to Renew Title V Operating Permit Number P204-R3M1 Harvest Four Corners, LLC – Middle Mesa VV Compressor Station

Dear Ms. Bisbey-Kuehn,

On behalf of Harvest Four Corners, LLC (Harvest), Cirrus Consulting, LLC submits the enclosed application to renew the Title V operating permit for the Middle Mesa VV Compressor Station (Middle Mesa VV).

Thank you for your assistance. If you have questions or need any additional information, please contact Oakley Hayes of Harvest at (505) 632-4421.

Sincerely,

**CIRRUS CONSULTING, LLC** 

ames W. Newby

James W. Newby

Attachment

Middle Mesa VV Title V Operating Permit Application

c: Oakley Hayes, Harvest



# NEW MEXICO 20.2.70 NMAC APPLICATION TO RENEW PERMIT NUMBER P204-R3M1

#### MIDDLE MESA VV COMPRESSOR STATION

#### **Submitted By:**



### HARVEST FOUR CORNERS, LLC

1755 Arroyo Drive Bloomfield, New Mexico 87413

Prepared By:

**CIRRUS CONSULTING, LLC** 

11139 Crisp Air Drive Colorado Springs, Colorado 80908 (801) 294-3024

June 2022



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#### Introduction

The Harvest Four Corners, LLC (Harvest) Middle Mesa VV Compressor Station (Middle Mesa VV) currently operates under a construction permit, 918-M7, dated March 9, 2012 (with revisions through -R3, the most recent dated March 26, 2018), and a Title V operating permit, P204-R3, dated June 28, 2018 (with revision M1 dated July 16, 2021).

Note that Harvest took over the operation of this facility on April 1, 2021. The facility was shut down on that date and has not operated since. Other than the information contained in the current permits and most recent Title V renewal application, little is known of the facility and how it was operated prior to that time.

A list of the equipment currently approved for use at the facility by the Title V operating permit can be found in Tables 2-A and 2-B of Section 2 of this application.

This application is being submitted to renew the Title V operating permit. The renewal application is due 12 months prior to June 28, 2023.

Though there are no modifications associated with this application, most of the unit numbers for the various sources have been changed so as to be consistent with the typical Harvest numbering convention.



#### Mail Application To:

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

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



For Department use only:

AIRS No.:

### **Universal Air Quality Permit Application**

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

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

**This application is submitted as** (check all that apply): ☐ Request for a No Permit Required Determination (no fee) ☐ Updating 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.
□ \$500 NSR application Filing Fee enclosed OR □ The full permit fee associated with 10 fee points (required w/ streamline
applications).
☐ Check No.: XXXX in the amount of \$500.00
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.
☑ I acknowledge there is an annual fee for permits in addition to the permit review fee: <a href="www.env.nm.gov/air-quality/permit-fees-2/">www.env.nm.gov/air-quality/permit-fees-2/</a> .
☐ This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full \$500.00 filing fee is included with this
application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has
been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information:
www.env.nm.gov/air-quality/small-biz-eap-2/.)
Citation: Please provide the low level citation under which this application is being submitted: 20.2.70.300.B(2) NMAC

### **Section 1 – Facility Information**

(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)

		AI # if known (see 1 <sup>st</sup>	Updating					
C	· 1 A C T C · ·	3 to 5 #s of permit	Permit/NOI #:					
Sec	tion 1-A: Company Information	IDEA ID No.): 1193	P204-R3M1					
1	1 Facility Name: Middle Mesa VV Compressor Station	Plant primary SIC Code (4 digits): 1389						
1	Pacinty Name. Widdle Wesa V V Compressor Station	Plant NAIC code (6 digits): 213112						
a	Facility Street Address (If no facility street address, provide directions from <b>See directions in Section 1-D4</b>	n a prominent landmark)	:					
2	Plant Operator Company Name: Harvest Four Corners, LLC	Phone/Fax: (505) 632-	4600 / (505) 632-4782					
a	a Plant Operator Address: 1755 Arroyo Drive, Bloomfield, New Mexico 87413							

b	Plant Operator's New Mexico Corporate ID or Tax ID: 76-0451075	
3	Plant Owner(s) name(s): Same as #2 above	Phone/Fax: Same as #2 above
a	Plant Owner(s) Mailing Address(s): Same as #2a above	
4	Bill To (Company): Same as #2 above	Phone/Fax: Same as #2 above
a	Mailing Address: Same as #2a above	E-mail: N/A
5	□ Preparer: ☑ Consultant: James Newby, Cirrus Consulting, LLC	Phone/Fax: (801) 294-3024
a	Mailing Address: 11139 Crisp Air Drive, Colorado Springs, CO 80908	E-mail: jnewby@cirrusllc.com
6	Plant Operator Contact: Oakley Hayes	Phone/Fax: (505) 632-4421 / (505) 632-4782
a	Address: Same as #2a above	E-mail: Oakley.Hayes@harvestmidstream.com
7	Air Permit Contact: Same as #6 above	Title: Environmental Specialist
a	E-mail: Same as #6a above	Phone/Fax: Same as #6 above
b	Mailing Address: Same as #2a above	
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**

	tion 1-B. Current Facility 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?
3	Is the facility currently shut down? ☑ Yes ☐ No	✓ Yes □ No  If yes, give month and year of shut down (MM/YY): 04/01/2021
4	Was this facility constructed before 8/31/1972 and continuously operated s	since 1972? □ Yes ☑ No
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMA ☐ Yes ☐ No ☑ N/A It is assumed this question refers to question 4 rates	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)?  ✓ Yes □ No	If yes, the permit No. is: <b>P204-R3M1</b>
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: 918-M7R3
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	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)								
a	Current Hourly: 2.5 MMCF <sup>(a)</sup> Daily: 60 MMCF <sup>(a)</sup> Annually: 21,900 MMCF <sup>(a)</sup>									
b	Proposed	roposed Hourly: 2.5 MMCF <sup>(a)</sup> Daily: 60 MMCF <sup>(a)</sup> Annually: 21,900 MMCF <sup>(a)</sup>								
2	What is the	facility's maximum production rate, sp	pecify units (reference here and list capacities in	Section 20, if more room is required)						
a	a Current Hourly: 2.5 MMCF <sup>(a)</sup> Daily: 60 MMCF <sup>(a)</sup> Annually: 21,900 MMCF <sup>(a)</sup>									
b	Proposed									

(a) The station capacity is a direct function of available horsepower. The throughput is therefore dependent on atmospheric temperature and pressure, gas temperature and pressure, relative humidity and gas quality, was well as other factors. The "throughput" expressed above is a nominal quantity (with a 15 percent safety factor), neither an absolute maximum, nor an average. Actual throughput will vary from the nominal amount.

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

			uon minoi mauon		1					
1	Section: 10	Range: 7W	Township: 31N	County: San Juan	Elevation (ft): 6,585					
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): <b>271,526</b>	UTM N (in meters, to nearest 10 meters):	4,087,573					
b	AND Latitude	(deg., min., sec.):	36° 54' 23.44"	Longitude (deg., min., sec.): 107°	33' 51.97"					
3	Name and zip code of nearest New Mexico town: Aztec, New Mexico 87410									
4	4018, turn rigl	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): <b>Drive east towards County Road</b> 4018, turn right on County Road 4000, turn left on County Road 4020 (Pine River Road), continue on NM-511S, take a sharp right at CS-172S, turn right at NM-173 (Navajo Dam Road)								
5	The facility is a	approximately 55	5 miles northeast of Aztec	, New Mexico.						
6	Status of land a	nt facility (check of	one):   Private   Indian/Pu	ueblo 🗹 Federal BLM 🗆 Federal Foi	est Service  Other (specify)					
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: <b>Rio Arriba County</b> , <b>San Juan County</b> , <b>Southern Ute Tribe</b>									
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="https://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: <b>N/A</b>									
9	Name nearest (	Class I area: Wen	ninuche Wilderness Area							
10	Shortest distance	ce (in km) from fa	acility boundary to the bou	ndary of the nearest Class I area (to the	e nearest 10 meters): <b>62.76</b>					
11	lands, including	g mining overburd		ions (AO is defined as the plant site in est residence, school or occupied struc- residence						
12	Method(s) used "Restricted An continuous wal that would requ	I to delineate the larea" is an area to sals, or other continuire special equip	Restricted Area: Fence which public entry is effect to uous barriers approved by ment to traverse. If a large	tively precluded. Effective barriers in the Department, such as rugged phys property is completely enclosed by found ublic roads cannot be part of a Restric	ical terrain with steep grade encing, a restricted area					
13	Does the owner  ☐ Yes ☑ No  A portable statione location or	r/operator intend to ionary source is not that can be re-ins	to operate this source as a pot a mobile source, such as talled at various locations,	cortable stationary source as defined is an automobile, but a source that can such as a hot mix asphalt plant that is	in 20.2.72.7.X NMAC? be installed permanently at s moved to different job sites.					
14			nction with other air regul nit number (if known) of the	ated parties on the same property? <b>\(\ni_{\text{nhe}}\)</b> the other facility? <b>N/A</b>	I No □ Yes					

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

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

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

1	Are there any current Notice of Violations (NOV), compliant to this facility? ☐ Yes ☑ No If yes, specify: N/A	ance orders, or any ot	her compli	iance or enforcement issues related
a	If yes, NOV date or description of issue: N/A			NOV Tracking No: N/A
b	Is this application in response to any issue listed in 1-F, 1 of	or 1a above? □ Yes I	☑ No If Y	es, provide the 1c & 1d info below:
c	Document Title: : N/A	Date: : N/A		ment # (or nd paragraph #):: <b>N/A</b>
d	Provide the required text to be inserted in this permit: : N/.	A		
2	Is air quality dispersion modeling or modeling waiver bein	g submitted with this	applicatio	n? □ Yes <b>☑</b> No
3	Does this facility require an "Air Toxics" permit under 20.	2.72.400 NMAC & 2	0.2.72.502	, Tables A and/or B?   Yes   No
4	Will this facility be a source of federal Hazardous Air Polls	utants (HAP)? 🗹 Ye	s □ No	
a	If Yes, what type of source? $\Box$ Major ( $\Box$ $\geq$ 10 tpy of any OR $\square$ Minor ( $\square$ <10 tpy of any	single HAP <b>OR</b> □≥ single HAP <b>AND ☑</b>	25 tpy of a 1 < 25 tpy o	ny combination of HAPS) of any combination of HAPS)
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☐ Yes	<b>☑</b> No		
a	If yes, include the name of company providing commercial Commercial power is purchased from a commercial utility site for the sole purpose of the user.			

#### 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)) Responsible Official (R.O.) (20.2.70.300.D.2 NMAC): Travis Jones Phone: (713) 289-2630 R.O. Title: EH&S Manager R.O. e-mail: trjones@harvestmidstream.com h R. O. Address: 1111 Travis Street, Houston, Texas 77002 2 Phone: TBD Alternate Responsible Official (20.2.70.300.D.2 NMAC): **TBD** A. R.O. Title: TBD A. R.O. e-mail: TBD b A. R. O. Address: TBD 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 3 relationship): N/A Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.): Hilcorp Energy Company Address of Parent Company: Same as #1b above Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are 5 owned, wholly or in part, by the company to be permitted.): N/A 6 Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: N/A Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other 7 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: Colorado (≈10.3 km), Jicarilla Apache Nation (≈32.7 km), Navajo Nation (≈63 km), Southern Ute Tribe (≈10.3 km), Ute Mountain Reservation (≈57.9 km)

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

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

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

- 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 Contact Name					
	Email				
	Phone number				

a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.** 

- 4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.
- 5) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver** and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling **summary report only** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.
- 6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
  - a. one additional CD copy for US EPA,
  - b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
  - c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

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

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

- 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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**Section 15:** Alternative Operating Scenarios

Section 16: Air Dispersion Modeling Section 17: Compliance Test History

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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					Manufact- urer's Rated	Requested Permitted	Date of Manufacture <sup>2</sup>	Controlled by Unit #	Source Classi-		RICE Ignition Type (CI, SI,	Replacing				
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 #	fication Code (SCC)	For Each Piece of Equipment, Check One	4SLB, 4SRB, 2SLB) <sup>4</sup>	Unit No.				
1	Compressor Engine	Superior	16SGTB	321509	2650 hp	2650 hp	Aug 1991	N/A	20200202	<b>☑ Existing (unchanged)</b> □ To be Removed □ New/Additional □ Replacement Unit	4SLB	N/A				
1	Compressor Engine	Superior	103011	321309	2030 np	2030 np	Aug 1991	1	20200202	20200202	20200202	20200202	20200202	☐ To Be Modified ☐ To be Replaced	43LD	IN/A
2	Compressor Engine	Superior	16SGTB	322639	2650 hp	2650 hp	Aug 1991	N/A	20200202	<b>☑ Existing (unchanged)</b> □ To be Removed □ New/Additional □ Replacement Unit	4SLB	N/A				
2	Compressor Engine	Superior	103015	322039	2030 lip	2030 lip	Aug 1991	2	20200202	☐ To Be Modified ☐ To be Replaced	43LD	IN/A				
CC) (	Startup, Shutdown &	27/4	<b>N</b> T/ <b>A</b>	DT/A	<b>N</b> T/A	NT/ A	N/A	N/A	21000200	<b>☑</b> Existing (unchanged) □ To be Removed	27/4	<b>N</b> T/A				
SSM	Maintenance	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31000299	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>	N/A	N/A				
							N/A	N/A		<b>☑</b> Existing (unchanged) □ To be Removed						
M1	Malfunctions	N/A	N/A	N/A	N/A	N/A	N/A	N/A	31000299	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>	N/A	N/A				
										□ Existing (unchanged) □ To be Removed     □ New/Additional □ Replacement Unit     □ To Be Modified □ To be Replaced     □ Existing (unchanged) □ To be Removed						
										□ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced						
										□ Existing (unchanged)       □ To be Removed         □ New/Additional       □ Replacement Unit         □ To Be Modified       □ To be Replaced						
										□ Existing (unchanged)     □ To be Removed       □ New/Additional     □ Replacement Unit       □ To Be Modified     □ To be Replaced       □ Existing (unchanged)     □ To be Removed						
										□ Existing (unchanged)       □ To be Removed         □ New/Additional       □ Replacement Unit         □ To Be Modified       □ To be Replaced         □ Existing (unchanged)       □ To be Removed						
										<ul> <li>□ New/Additional</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>						
										□ Existing (unchanged)       □ To be Removed         □ New/Additional       □ Replacement Unit         □ To Be Modified       □ To be Replaced						
										□ Existing (unchanged)       □ To be Removed         □ New/Additional       □ Replacement Unit         □ To Be Modified       □ To be Replaced						
										□ Existing (unchanged)       □ To be Removed         □ New/Additional       □ Replacement Unit         □ To Be Modified       □ To be Replaced						
										□ Existing (unchanged)       □ To be Removed         □ New/Additional       □ Replacement Unit         □ To Be Modified       □ To be Replaced						

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

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

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

<sup>&</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

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

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

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction <sup>2</sup>	For Each Piece of Equipment, Check Onc
Omt Number	Source Description	Manufacturei	Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction <sup>2</sup>	
T1	F 1. W 4 C4 T 1.			210	Not An Emissions Source	Aug 1991	☑ Existing (unchanged) □ To be Removed
T1	Fresh Water Storage Tank			bbl	For Information Only	Aug 1991	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To be Replaced</li> </ul>
				210	20.2.72.202.B(2)	Aug 1991	☑ Existing (unchanged) □ To be Removed
T2	Antifreeze Storage Tank			bbl	#1a & #1b	Aug 1991	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To be Replaced</li> </ul>
	Y 1010 T 1			210	20.2.72.202.B(2)	Aug 1991	☑ Existing (unchanged) □ To be Removed
Т3	Used Oil Storage Tank			bbl	#1a & #1b	Aug 1991	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To be Replaced</li> </ul>
T.4	T. 1			210	20.2.72.202.B(2)	Aug 1991	☑ Existing (unchanged) □ To be Removed
T4	Lubrication Oil Storage Tank			bbl	#1a & #1b	Aug 1991	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
T. 5	D 1 177 G T 1			210	20.2.72.202.B(5)	Aug 1991	☑ Existing (unchanged) □ To be Removed
T5	Produced Water Storage Tank			bbl	#1a & #1b	Aug 1991	<ul> <li>□ New/Additional</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
				36	20.2.72.202.B(2)	Aug 1991	☑ Existing (unchanged) □ To be Removed
Т6	Wastewater Storage Tank			bbl	#1a & #1b	Aug 1991	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To be Replaced</li> </ul>
				N/A	N/A	Aug 1991	<b>☑</b> Existing (unchanged) □ To be Removed
F1	Equipment Leak Emissions			N/A	#1a & #1b	Aug 1991	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To be Replaced</li> </ul>
				N/A	20.2.72.202.B(5)	Aug 1991	☑ Existing (unchanged) □ To be Removed
L1	Truck Loading Emissions			N/A	#1a & #1b	Aug 1991	<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
						Ü	☐ Existing (unchanged) ☐ To be Removed
							<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
							☐ Existing (unchanged) ☐ To be Removed
							<ul> <li>□ New/Additional</li> <li>□ Replacement Unit</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
							☐ Existing (unchanged) ☐ To be Removed
							<ul> <li>□ New/Additional</li> <li>□ To Be Modified</li> <li>□ To be Replaced</li> </ul>
							☐ Existing (unchanged) ☐ To be Removed
							□ New/Additional □ Replacement Unit
							☐ To Be Modified ☐ To be Replaced ☐ Existing (unchanged) ☐ To be Removed
							□ New/Additional □ Replacement Unit
							☐ To Be Modified ☐ To be Replaced

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
N/A						

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

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

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

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

Unit No.	NO			0		OC		Ox	P		[10 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н			ead
OIII INO.	lb/hr	ton/yr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr								
N/A																	
																	1
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 PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

#### **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.	NO	Ox	C	0	VC	)C	SC	Ox	Pl	$M^1$	PM	[10 <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		ton/yr	lb/hr	ton/yr	lb/hr	ton/yr		ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
1	8.76	38.38	14.72	64.48	2.34	10.24	1.10E-02	4.81E-02	1.87E-01	8.17E-01	1.87E-01	8.17E-01	1.87E-01	8.17E-01	-	-	-	-
2	8.76	38.38	14.72	64.48	2.34	10.24	1.10E-02	4.81E-02	1.87E-01	8.17E-01	1.87E-01	8.17E-01	1.87E-01	8.17E-01	1	-	-	-
SSM	-	-	ı	-	Unspecified	3.20	-	-	-	-	-	-	-	-	ı	-	1	-
M1	-	-	-	-	Unspecified	10.00	-	-	-	-	-	-	-	-	-	-	-	-
Totals	17.53	76.77	29.45	128.97	4.67	33.67	2.20E-02	0.62E.02	2 72E 01	1.63	3.73E-01	1.63	3.73E-01	1.63			_	_
1 otals	17.33	/0.//	29.43	128.97	4.07	33.07	2.20E-02	9.02E-02	3./3E-UI	1.03	3./3E-01	1.03	3./3E-UI	1.03	-	-	-	-

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

#### 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 scehduled 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.		Ox	C		VO	OC	SO	Ox	P	$M^2$	PM	$10^2$	PM	$2.5^{2}$	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
1	-	-	-	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-
2	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-
SSM	-	-	-	-	Unspecified	3.20	-	-	-	-	-	-	-	-	-	-	-	-
M1	-	-	-	-	Unspecified	10.00	-	-	-	-	-	-	-	-	-	-	-	-
Totals	-	-	-	-	Unspecified	13.20	-	-	-	-	-	-	-	-	-	-	-	-

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

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

#### 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.

Q: 1.37	Serving Unit	N	Ox	C	О	V	OC	SO	Ox	P	M	PM	110	PM	12.5	□ H <sub>2</sub> S o	r □ Lead
Stack No.	Number(s) from Table 2-A	lb/hr	ton/yr	lb/hr	ton/yr												
N/A																	
																	_
	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	Rain Caps	Height Above	Temp.	Flow	Rate	Moisture by	Velocity	Inside
Number	Serving Unit Number(s) from Table 2-A	(H-Horizontal V=Vertical)	(Yes or No)	Ground (ft)	(F)	(acfs)	(dscfs)	Volume (%)	(ft/sec)	Diameter (ft)
1	1	V	No	42.0	760	316			179	1.5
2	2	V	No	42.0	760	316			179	1.5

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

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

	Unit No.(s)	Total	TI A D		ldehyde	Provide Name	Pollutant Here or 🗆 TAP	Provide Name	Pollutant Here or   TAP		e Here	Namo	Pollutant Here or   TAP	Name	Pollutant e Here or   TAP	Nam	Pollutant e Here or   TAP	Namo	Pollutant Here or 🗆 TAP
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
1	1	1.0	4.5	1.0	4.3														
2	2	1.0	4.5	1.0	4.3														
SSM	SSM	ı	0.1	-	-														
M1	M1	-	0.3	-	-														
Tota	ls:	2.1	9.5	2.0	8.6														

#### 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,		Specia	fy Units		
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
1	Natural Gas	Raw/Field Natural Gas	900 Btu/scf	20.76 mscf	181.84 mmscf	N/A	N/A
2	Natural Gas	Raw/Field Natural Gas	900 Btu/scf	20.76 mscf	181.84 mmscf	N/A	N/A

#### 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.

				Liquid	Vapor	Average Stor	age Conditions	Max Storag	ge Conditions
Tank No.	SCC Code	Material Name	Composition	Density (lb/gal)	Molecular Weight (lb/lb*mol)	Temperature (°F)	True Vapor Pressure (psia)	Temperature (°F)	True Vapor Pressure (psia)
T1	31000299	Fresh Water	100% H2O	Not an emiss	sion source				
T2	31000299	Antifreeze	50% Ethylene Glycol & 50% H2O	Exempt & Ir	nsignificant Sour	ce			
Т3	31000299	Used Oil	100 % Oil	Exempt & Ir	nsignificant Sour	ce			
T4	31000299	Lubrication Oil	100 % Oil	Exempt & Ir	nsignificant Sour	ce			
T5	31000299	Produced Water	99% H2O & 1% Hydrocarbons	Exempt & Ir	nsignificant Sour	ce			
T6	31000299	Wastewater	99% H2O & 1% Hydrocarbons	Exempt & Ir	nsignificant Sour	ce			

#### Table 2-L: Tank Data

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

Tank No.	Date	Materials Stored	Seal Type (refer to Table 2	Roof Type (refer to Table 2-	Сар	acity	Diameter	Vapor Space		olor ible VI-C)	Paint Condition	Annual Throughput	Turn- overs
	Installed		LR below)	LR below)	(bbl)	$(M^3)$	(M)	(M)	Roof	Shell	(from Table VI-C)	(gal/yr)	(per year)
T1	Aug 1991	Fresh Water	Not an emissi	ion source									
T2	Aug 1991	Antifreeze	Exempt & Ins	significant Sou	irce								
Т3	Aug 1991	Used Oil	Exempt & Ins	significant Sou	irce								
T4	Aug 1991	Lubrication Oil	Exempt & Ins	significant Sou	irce								
T5	Aug 1991	Produced Water	Exempt & Ins	significant Sou	irce								
Т6	Aug 1991	Wastewater	Exempt & Ins	significant Sou	irce								

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

	1401	e = z=e ziquiu storuge				
Roof Type	Seal Type, W	elded Tank Seal Type	Seal Type, Rive	eted Tank Seal Type	Roof, Shell Color	Paint Condition
FX: Fixed Roof	Mechanical Shoe Seal	Liquid-mounted resilient seal	Vapor-mounted resilient seal	Seal Type	WH: White	Good
IF: Internal Floating Roof	A: Primary only	A: Primary only	A: Primary only	A: Mechanical shoe, primary only	AS: Aluminum (specular)	Poor
EF: External Floating Roof	B: Shoe-mounted secondary	B: Weather shield	B: Weather shield	B: Shoe-mounted secondary	AD: Aluminum (diffuse)	
P: Pressure	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	LG: Light Gray	
					MG: Medium Gray	
Note: $1.00 \text{ bbl} = 0.159 \text{ M}$	$1^3 = 42.0 \text{ gal}$				BL: Black	
					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	Natural Gas	Gas/Liquid	60 mmscfd	Natural Gas	Natural Gas	Gas	60 mmscfd		
1									

#### **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									

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

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

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

#### **Table 2-P:** 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							<b>Total GHG</b> Mass Basis ton/yr <sup>4</sup>	Total CO <sub>2</sub> e ton/yr <sup>5</sup>
Unit No.	GWPs 1	1	298	25	22,800	footnote 3								
1	mass GHG	10613.449	2.00E-02	2.00E-01									10613.67	
1	CO <sub>2</sub> e	10613.449	5.96	5.00										10624.41
2	mass GHG	10613.449	2.00E-02	2.00E-01									10613.67	
2	CO <sub>2</sub> e	10613.45	5.96	5.00										10624.41
SSM	mass GHG	53.84		166.60		SSM emission	s include rec	iprocating c	ompressor e	missions			220.44	
SSIVI	CO <sub>2</sub> e	53.84		4164.91										4218.75
F1	mass GHG	2.52		7.80									10.32	
ГІ	CO <sub>2</sub> e	2.52		195.10										197.62
M1	mass GHG	55.45		171.39									226.84	
IVII	CO <sub>2</sub> e	55.45		4284.81										4340.26
	mass GHG													
	CO <sub>2</sub> e													
	mass GHG													
	CO <sub>2</sub> e													
	mass GHG													
	CO <sub>2</sub> e													
	mass GHG													
	CO <sub>2</sub> e													
	mass GHG													
	CO <sub>2</sub> e													
Totals -	mass GHG	21338.71	4.00E-02	346.19									21684.94	
	CO <sub>2</sub> e	21338.71	11.92	8654.81		1 T.11. A 1 6.4								30005.44

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

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

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

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

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

### **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.

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#### **Application Summary**

The Harvest Middle Mesa VV currently operates under a construction permit, 918-M7, dated March 9, 2012 (with revisions through -R3, the most recent dated March 26, 2018), and a Title V operating permit, P204-R3, dated June 28, 2018 (with revision M1 dated July 16, 2021).

Note that Harvest took over the operation of this facility on April 1, 2021. The facility was shut down on that date and has not operated since. Other than the information contained in the current permits and most recent Title V renewal application, little is known of the facility and how it was operated prior to that time.

A list of the equipment currently approved for use at the facility by the Title V operating permit can be found in Tables 2-A and 2-B of Section 2 of this application.

This application is being submitted to renew the Title V operating permit. The renewal application is due 12 months prior to June 28, 2023.

Though there are no modifications associated with this application, most of the unit numbers for the various sources have been changed so as to be consistent with the typical Harvest numbering convention.

- Malfunction emissions are identified as Unit M1, rather than Unit MALF.
- The storage tanks are identified as Units T1-T6, rather than Units 11-15 & 18, respectively.

- Equipment leak (fugitive) emissions are identified as Unit F1, rather than Unit 20.
- Produced water truck loading emissions are identified as Unit L1, rather than Unit 21.

The applicable regulation is 20.2.70 New Mexico Administrative Code (NMAC). The lowest level regulatory citation is 20.2.70.300.B(2) NMAC.

There are no modifications in this application to de-bottleneck impacts or change the facility's major/minor status (both prevention of significant deterioration [PSD] & Title V).

#### **Process Description**

The facility compresses field gas using compressors driven by natural gas-fired reciprocating internal combustion engines.

#### Startup, Shutdown and Maintenance Emissions

Except for blowdown events (described below), it is concluded there are no SSM emissions in excess of those identified for steady-state operation as seen in Table 2-E of Section 2. Discussions justifying this conclusion are provided in Section 6.

SSM emissions from blowdowns of the compressors and piping associated with the facility were calculated from the quantity of gas vented during each event, the composition of the gas, and the number of events. The number of blowdowns events were estimated based on historical operations. A safety factor was included.

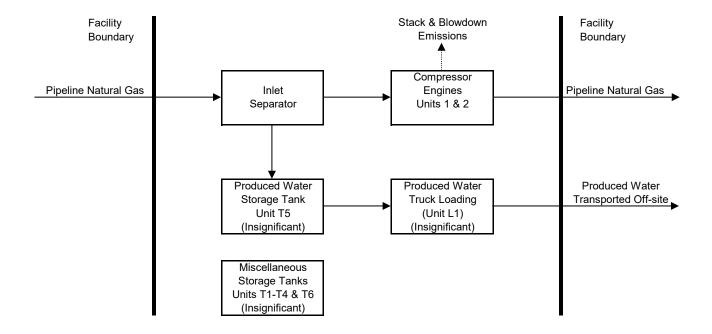
### **Section 4**

### **Process Flow Sheet**

A <u>process flow sheet</u> 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 diagram is provided in this section. Please see the following page.

### Flow Diagram



### **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 provided in this section. Please see the following page.

Form-Section 5 last revised: 8/15/2011 Section 5, Page 1 Saved Date: 6/15/2022

GRAVEL ROAD Middle Mesa Compressor Station Plot Plan

# **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.

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### **Engines**

The NO<sub>2</sub>, CO, and VOC emissions from the engines were calculated from manufacturer's data (taken from the previous Title V application). The SO<sub>2</sub> and particulate emissions were calculated using AP-42 emission factors from Table 3.2-2. HAP emissions were calculated using GRI-HAPCalc 3.0. All emissions were calculated assuming each engine operates at full site capacity for 8,760 hours per year.

The engines startup with no load and a rich fuel mixture. As a result, emissions are minimized. Because the engines take only minutes to reach operating temperature, emissions during startup are not expected to exceed the steady-state allowable limits. Similarly, emissions during shutdown do not exceed the steady-state allowable limits, because fuel and air flow cease within seconds of shutdown. Emissions due to scheduled maintenance are negligible as the engines are not in operation during maintenance.

No modifications are being made to the engines or their operation. Permitted criteria pollutant emissions are carried forward and not revised.

#### Compressors and Piping (SSM)

Blowdown emissions from the compressors and piping associated with the facility occur when high pressure gas is used to purge air from the system prior to startup. Also, after shutdowns, high pressure gas is released to atmosphere as a safety precaution.

VOC and HAP emissions from blowdowns of the compressors and piping associated with the station were calculated from the quantity of gas vented during each event, the composition of the gas, and the number of events. The quantity of gas vented during each event was determined by the previous owner. The composition of the gas was determined from a recent extended gas analysis. For each unit, the annual number of blowdown events were estimated based on historical operations. A safety factor was added because emissions from each blowdown event are dependent on the composition of the gas in the pipeline and because the number of blowdowns in a year may vary. Use of the safety factor is also designed to ensure an adequate emissions limit, which includes emissions from other miscellaneous startup, shutdown and maintenance activities.

The SSM emissions identified in this application are routine or predictable startup/shutdown and scheduled maintenance and do not include malfunctions or upsets.

No modifications are being made to the SSM emissions. Permitted VOC emissions are carried forward and not revised.

# Truck Loading (Produced Water)

The VOC emissions from produced water truck loading were calculated using the AP-42 emissions factor identified in Section 5.2-1. The data used to calculate the emission factor was obtained assuming the liquid was pure water.

Due to the nature of the source, it is estimated that SSM emissions from truck loading are accounted for in the calculations.

The produced water truck loading is an exempt source in accordance with 20.2.72.202.B(5) NMAC (VOC emissions are less than 0.5 tons per year) and a Title V insignificant source in accordance with Insignificant Activity Item #1.

#### **Equipment Leak Emissions**

VOC and HAP emissions from equipment leaks were calculated using emission factors from Table 2.4 of the 1995 Protocol for Equipment Leak Emission Estimates published by the Environmental Protection Agency (EPA) and the gas stream composition obtained from a recent extended gas analysis. Emissions were calculated assuming the equipment operates 8,760 hours per year.

Due to the nature of the source, it is estimated that SSM emissions from the equipment are accounted for in the calculations.

Equipment leak emissions are a Title V insignificant source in accordance with Insignificant Activity Item #1.

## **Malfunctions**

Malfunction emissions were set at 10.0 tons of VOC per year to account for emissions that may occur during upsets and malfunctions (including, but not limited to, unscheduled blowdowns and relief valve release). Based on the gas release rate associated with the set annual VOC emission rate, HAP emissions

were calculated using a recent extended gas analysis. Note that these malfunction emissions include the venting of gas only, not combustion emissions.

No modifications are being made to the malfunction emissions. Permitted VOC emissions are carried forward and not revised.

# Storage Tanks

VOC and HAP emissions from the produced water tank were calculated using a maximum throughput and emission factors from the Colorado Department of Public Health and Environment (CDPHE) and the Texas Commission on Environmental Quality (TCEQ). As the VOC emission rate from the produced water storage tank is less than 0.5 tpy, the produced water storage tank is an NSR exempt source in accordance with 20.2.72.202.B(5) NMAC and a Title V insignificant source in accordance with Insignificant Activity Item #1.

For the remaining tanks, the following assumptions were made:

- The anti-freeze is an inhibited ethylene glycol (EG) coolant containing 50 percent EG and 50 percent water. As the vapor pressure of EG is less than 0.2 psia, the tank containing antifreeze is an exempt source under 20.2.72.202.B(2) NMAC and a Title V insignificant source in accordance with Insignificant Activity List Item #5;
- Residual oil #6 was used as an estimate for lubrication oil. As the vapor pressure of residual oil #6 is less than 0.2 psia, the tanks containing lubrication oil are NSR exempt sources under 20.2.72.202.B(2) NMAC and Title V insignificant sources in accordance with Insignificant Activity Item #5;
- The wastewater storage tank is assumed to be 99% water and 1% residual oil. As the vapor pressure of residual oil is less than 0.2 psia, the tank containing wastewater is an exempt source under 20.2.72.202.B(2) NMAC and a Title V insignificant source in accordance with Insignificant Activity List Item #5;

Due to the nature of operations, startup and shutdown emissions from the storage tanks are assumed to be accounted for in the calculations discussed above. Emissions due to maintenance are negligible as the units are not in operation during maintenance.

No changes are being made to the storage tanks or their operation.

## **Engine Exhaust Emissions Calculations**

Unit Number: 1 & 2

Description: Superior 16SGTB
Type: Four Stroke Lean Burn

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

**Horsepower Calculations** 

6,585 ft above MSL Elevation
2,650 hp Nameplate hp Previous Title V application
2,444 hp NMAQB Site-rated hp NMAQB Procedure # 02.002-00

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

2,650 hp Mfg. Site-rated hp Previous Title V application

**Engine Specifications** 

9000 rpm Engine rpm Previous Title V application

**Fuel Consumption** 

7050 Btu/hp-hr Brake specific fuel consumption Previous Title V application

18.68 MMBtu/hr Hourly fuel consumption Btu/hp-hr x Mfg. site-rated hp / 1,000,000

900 Btu/scfField gas heating valueNominal heat content20,758 scf/hrHourly fuel consumptionMMBtu/hr x 1,000,000 / Btu/scf

8,760 http:// Annual operating time Harvest Four Corners, LLC

163,659 MMBtu/yrAnnual fuel consumptionMMBtu/hr x hr/yr181.84 MMscf/yrAnnual fuel consumptionscf/hr x hr/yr / 1,000,000

#### Steady-State Emission Rates

	Emission		
Pollutants	Factors,	Uncontrolled E	mission Rates,
	g/hp-hr	pph	tpy
NOX	1.50	8.76	38.38
CO	2.52	14.72	64.48
VOC	0.40	2.34	10.24

Emission factors taken from previous Title V application

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

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

Pollutants	Emission Factors.	Uncontrolled F	mission Rates,
1 Ollutarits	,		
	lb/MMBtu	pph	tpy
SO2	5.88E-04	1.10E-02	4.81E-02
PM	9.99E-03	1.87E-01	8.17E-01
PM10	9.99E-03	1.87E-01	8.17E-01
PM2.5	9.99E-03	1.87E-01	8.17E-01

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

Particulate factors include both filterable and condensible emissions

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

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

#### **Exhaust Parameters**

760 °F	Stack exit temperature	Previous Title V application
18980 acfm	Stack flowrate	Previous Title V application
1.50 ft	Stack exit diameter	Previous Title V application
1.77 ft^2	Stack exit area	3.1416 x ((ft / 2) ^2)
179.01 fps	Stack exit velocity	acfm / ft^2 / 60 sec/min
42.00 ft	Stack height	Previous Title V application

# GRI-HAPCalc® 3.0 Engines Report

Facility ID: MIDDLE MESA VV Notes:

Operation Type: COMPRESSOR STATION

Facility Name: MIDDLE MESA VV COMPRESSOR

User Name: Harvest Four Corners, LLC

Units of Measure: U.S. STANDARD

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

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

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

**Engine Unit** 

Unit Name: 16SGTB

Hours of Operation: 8,760 Yearly Rate Power: 2,650 hp

Fuel Type: FIELD GAS

Engine Type: 4-Stroke, Lean Burn

Emission Factor Set: FIELD > EPA > LITERATURE

Additional EF Set: -NONE-

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

<b>Chemical Name</b>	Emissions	<b>Emission Factor</b>	Emission Factor Set
HAPs			
Formaldehyde	4.3028	0.16830000 g/bhp-hr	GRI Literature
Benzene	0.1329	0.00520000 g/bhp-hr	GRI Literature
Toluene	0.0537	0.00210000 g/bhp-hr	GRI Literature
Xylenes(m,p,o)	0.0358	0.00140000 g/bhp-hr	GRI Literature
Total	4.5252		

05/20/2022 13:32:33 GRI-HAPCalc 3.0 Page 1 of 1

# **Compressor Blowdown Emissions Calculations**

Unit Number: SSM

Description: Compressor & Piping Associated With Station

Throughput

2 # of units Number of units Harvest Four Corners, LLC
182 events/yr/unit Blowdowns per year per unit Harvest Four Corners, LLC
8,286 scf/event Gas loss per blowdown Harvest Four Corners, LLC

3,019,250 scf/yr Annual gas loss # of units x events/yr/unit x scf/event

#### **Emission Rates**

		Uncontrolled,
	Emission	Emission
Pollutants	Factors,	Rates,
	lb/scf	tpy
VOC	2.120E-03	3.20
Benzene	5.353E-06	8.08E-03
Ethylbenzene	1.119E-06	1.69E-03
n-Hexane	3.021E-05	4.56E-02
Isooctane	0.000E+00	0.00E+00
Toluene	1.360E-05	2.05E-02
Xylene	1.399E-05	2.11E-02

Emission factors calculated from gas composition (see table below) Uncontrolled Emission Rates (tpy) = scf/yr x lb/scf / 2,000 lb/ton

#### **Gas Composition**

	Mole	Molecular	Emission
Components	Percents,	Weights,	Factors,
·	%	lb/lb-mole	lb/scf
Carbon dioxide	10.1327	44.01	1.175E-02
Hydrogen sulfide	0.0000	34.07	0.000E+00
Nitrogen	0.1567	28.01	1.157E-04
Methane	85.9359	16.04	3.633E-02
Ethane	2.3794	30.07	1.886E-03
Propane	0.7862	44.09	9.136E-04
Isobutane	0.1328	58.12	2.034E-04
n-Butane	0.1705	58.12	2.612E-04
Isopentane	0.0558	72.15	1.061E-04
n-Pentane	0.0402	72.15	7.645E-05
Cyclopentane	0.0028	70.14	5.176E-06
n-Hexane	0.0133	86.17	3.021E-05
Cyclohexane	0.0097	84.16	2.152E-05
Other hexanes	0.0318	86.18	7.223E-05
Heptanes	0.0187	100.20	4.939E-05
Methylcyclohexane	0.0143	98.19	3.701E-05
Isooctane	0.0000	100.21	0.000E+00
Benzene	0.0026	78.11	5.353E-06
Toluene	0.0056	92.14	1.360E-05
Ethylbenzene	0.0004	106.17	1.119E-06
Xylenes	0.0050	106.17	1.399E-05
C8+ Heavies	0.1067	110.00	3.094E-04
Tota			
Total VOC			2.120E-03

Gas stream composition obtained from Middle Mesa VV extended gas analysis dated 3/12/2021 Emission Factors (lb/scf) = (% / 100) x lb/lb-mole / 379.4 scf/lb-mole

#### **Malfunction Emissions Data and Calculations**

Unit Number: M1

Description: Malfunctions

#### **Emission Rates**

Pollutants	Weight Percents, %	Uncontrolled Emission Rates, tpy
VOC		10.00
Benzene	2.525E-01	2.53E-02
Ethylbenzene	5.280E-02	5.28E-03
n-Hexane	1.425E+00	1.43E-01
Isooctane	0.000E+00	0.00E+00
Toluene	6.416E-01	6.42E-02
Xylene	6.601E-01	6.60E-02

Weight percents calculated from gas composition (see table below)
Uncontrolled Emission Rates (tpy) = VOC Emission Rate (tpy) x (% / 100)

#### **Gas Composition**

Components	Mole Percents,	Molecular Weights,	Component Weights,	Weight Percent,
	%	lb/lb-mole	lb/lb-mole	%
Carbon dioxide	10.1327	44.01		
Hydrogen sulfide	0.0000	34.07		
Nitrogen	0.1567	28.01		
Methane	85.9359	16.04		
Ethane	2.3794	30.07		
Propane	0.7862	44.09	0.3466	4.310E+01
Isobutane	0.1328	58.12	0.0772	9.597E+00
n-Butane	0.1705	58.12	0.0991	1.232E+01
Isopentane	0.0558	72.15	0.0403	5.006E+00
n-Pentane	0.0402	72.15	0.0290	3.606E+00
Cyclopentane	0.0028	70.14	0.0020	2.442E-01
n-Hexane	0.0133	86.17	0.0115	1.425E+00
Cyclohexane	0.0097	84.16	0.0082	1.015E+00
Other hexanes	0.0318	86.18	0.0274	3.408E+00
Heptanes	0.0187	100.20	0.0187	2.330E+00
Methylcyclohexane	0.0143	98.19	0.0140	1.746E+00
Isooctane	0.0000	100.21	0.0000	0.000E+00
Benzene	0.0026	78.11	0.0020	2.525E-01
Toluene	0.0056	92.14	0.0052	6.416E-01
Ethylbenzene	0.0004	106.17	0.0004	5.280E-02
Xylenes	0.0050	106.17	0.0053	6.601E-01
C8+ Heavies	0.1067	110.00	0.1174	1.459E+01
Total	100.0011			
Total VOC			0.8042	

Gas stream composition obtained from Middle Mesa VV extended gas analysis dated 3/12/2021 Component Weights (lb/lb-mole) = (% / 100) x Molecular Weights (lb/lb-mole) Weight Percents (%) = 100 x Component Weights (lb/lb-mole) / Total VOC Weight (lb/lb-mole)

# **Equipment Leaks Emissions Calculations**

Unit Number: F1

Description: Valves, Connectors, Seals & Open-Ended Lines (Insignificant)

#### Steady-State Emission Rates

	Number of	Emission	Emission	Uncor	ntrolled
Equipment	Components,	Factors,	Factors,	Emissio	n Rates,
	# of sources	kg/hr/source	lb/hr/source	pph	tpy
Valves	315	0.0045	0.0099	3.12	13.66
Connectors	263	0.0002	0.0004	0.12	0.51
Pump Seals	0	0.0024	0.0053	0.00	0.00
Compressor Seals	32	0.0088	0.0194	0.62	2.71
Pressure Relief Valves	19	0.0088	0.0194	0.37	1.61
Open-Ended Lines	88	0.0020	0.0044	0.39	1.70
To	tal			4.61	20.19

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

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

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

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

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

	Mole	Molecular	Component	Weight,	Uncon	trolled
Components	Percents,	Weights,	Weights,	Percent	Emissio	n Rates,
	%	lb/lb-mole	lb/lb-mole	%	pph	tpy
Carbon dioxide	10.1327	44.010	4.459	22.506	1.04E+00	4.54E+00
Hydrogen sulfide	0.0000	34.070	0.000	0.000	0.00E+00	0.00E+00
Nitrogen	0.1567	28.013	0.044	0.222	1.02E-02	4.47E-02
Methane	85.9359	16.043	13.787	69.580	3.21E+00	1.40E+01
Ethane	2.3794	30.070	0.715	3.611	1.66E-01	7.29E-01
Propane	0.7862	44.097	0.347	1.750	8.06E-02	3.53E-01
Isobutane	0.1328	58.123	0.077	0.390	1.80E-02	7.86E-02
n-Butane	0.1705	58.123	0.099	0.500	2.31E-02	1.01E-01
Isopentane	0.0558	72.150	0.040	0.203	9.36E-03	4.10E-02
n-Pentane	0.0402	72.150	0.029	0.146	6.75E-03	2.95E-02
Cyclopentane	0.0028	70.134	0.002	0.010	4.57E-04	2.00E-03
n-Hexane	0.0133	86.177	0.011	0.058	2.67E-03	1.17E-02
Cyclohexane	0.0097	84.161	0.008	0.041	1.90E-03	8.32E-03
Other hexanes	0.0318	86.177	0.027	0.138	6.37E-03	2.79E-02
Heptanes	0.0187	100.204	0.019	0.095	4.36E-03	1.91E-02
Methylcyclohexane	0.0143	98.188	0.014	0.071	3.27E-03	1.43E-02
Isooctane	0.0000	114.231	0.000	0.000	0.00E+00	0.00E+00
Benzene	0.0026	78.114	0.002	0.010	4.72E-04	2.07E-03
Toluene	0.0056	92.141	0.005	0.026	1.20E-03	5.26E-03
Ethylbenzene	0.0004	106.167	0.000	0.002	9.88E-05	4.33E-04
Xylenes	0.0050	106.167	0.005	0.027	1.23E-03	5.41E-03
C8+ Heavies	0.1067	114.231	0.122	0.615	2.84E-02	1.24E-01
Total	100.0011		19.814			
Total VOC				4.082	1.88E-01	8.24E-01

Gas stream composition obtained from Middle Mesa VV extended gas analysis dated 3/12/2021

Component Weights (lb/lb-mole) = (% / 100) \* Molecular Weights (lb/lb-mole)

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

Uncontrolled Emission Rates (pph) = Total Uncontrolled Emission Rate (from Table 1 above) (pph) x (% / 100)

Uncontrolled Emission Rates (tpy) = Total Uncontrolled Emission Rate (from Table 1 above) (tpy) x (% / 100)

# **Equipment Leaks Emissions Calculations**

Unit Number: F1

Description: Valves, Connectors, Seals & Open-Ended Lines (Insignificant)

#### **Component Count**

Number of Compressors at the Facility: 2
Number of Dehydrators at the Facility: 0

		Equipment Count				Ins	trument	Count	
					Pressure				
Process Equipment Description			Pump	Compressor	Relief	Open-			
	Valves	Connectors	Seals	Seals	Valves	End	Flow	Level	Pressure
Station inlet, meter run to pulsation dampener	17	14	0	0	1	13	3	0	3
Pulsation dampener	12	8	0	0	0	2	0	4	1
Compressor suction header	7	4	0	0	0	3	0	0	1
Suction header feed to instrument gas header	3	1	0	0	0	1	0	0	0
Compressor discharge header and bypass to station discharge	6	5	0	0	0	3	0	1	1
Compressor discharge header and suction header bypass lines	4	2	0	0	0	2	0	0	1
Fuel gas header	2	2	0	0	1	2	0	0	1
Instrument gas header	2	2	0	0	1	2	0	0	0
Station discharge header	9	5	0	0	1	6	0	0	2
Fuel gas recovery header	2	2	0	0	1	2	0	0	0
Fuel gas feed and filter loop	15	9	0	0	0	1	0	4	1
Instrument gas feed and filter loop	9	11	0	0	0	3	0	0	0
Produced water storage tank	1	0	0	0	0	1	0	1	0
ESD panel	12	0	0	0	0	0	0	0	0
Starting gas header	6	2	0	0	1	3	0	0	0
Hot gas header	2	2	0	0	0	2	0	0	0
Volume bottle lop	12	4	0	24	1	2	0	0	1
Components from Compressors	88	118	0	8	12	22	0	8	18
Components from dehydrators	0	0	0	0	0	0	0	0	0
Total	209	191	0	32	19	70	3	18	30
Adjusted Total	315	263	0	32	19	88			

The following additions are included in the Adjusted Total:

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

The component count is based on the evaluation of a comparable facility (Sim Mesa Central Delivery Point)

## **Truck Loading (Produced Water) Emissions Calculations**

Unit Number: L1

Description: Truck Loading (Insignificant)

#### **Emission Factor**

0.6 Saturation factor, S AP-42, Table 5.2-1 (submerged loading & dedicated service) 0.4581 psia (maximum) True vapor pressure of liquid, P Estimated using Antoine's Equation (see calculations below) 0.3045 psia (average) True vapor pressure of liquid, P Estimated using Antoine's Equation (see calculations below) 18.02 lb/lb-mole Molecular weight of vapors, M TANKS 4.0 Database 77 °F (maximum) Temperature of liquid Estimated (see calculations below) 65 °F (average) Temperature of liquid Estimated (see calculations below) 536.67 °R (maximum) Temperature of liquid, T °F + 459.67 524.67 °R (average) °F + 459.67 Temperature of liquid, T 0.11 lb/10<sup>3</sup> gal (maximum) 0.08 lb/10<sup>3</sup> gal (average) Emission factor, L AP-42, Section 5.2, Equation 1 Emission factor, L AP-42, Section 5.2, Equation 1  $L = 12.46 \frac{SPM}{T}$ 

**Production Rate** 

3.36 10^3 gal/hr Maximum hourly production rate Harvest Four Corners, LLC
105.84 10^3 gal/yr Maximum annual production rate Harvest Four Corners, LLC

#### Steady-State Emission Rates

Pollutant	Uncontrolled E	Emission Rates,
	ррп	ιρy
VOC	3.86E-01	4.14E-03

The short-term emission rates are calculated using the maximum true vapor pressure and maximum temperature of the liquid The annual emission rates are calculated using the average true vapor pressure and average temperature of the liquid Uncontrolled Emission Rate (pph) = lb/10^3 gal x 10^3 gal/hr Uncontrolled Emission Rate (tpy) = lb/10^3 gal x 10^3 gal/yr / 2,000 lb/ton

	Mass		
Pollutants	Fraction	Uncontrolled E	mission Rates,
		pph	tpy
Benzene	0.0267	1.03E-04	1.11E-06
Ethylbenzene	0.0027	1.03E-05	1.11E-07
n-Hexane	0.0840	3.24E-04	3.47E-06
Toluene	0.0344	1.33E-04	1.42E-06
m-Xylene	0.0229	8.85E-05	9.48E-07

HAP mass fractions are estimated from the produced water tank emission factors
HAP Mass Fraction = HAP Emission Factor (lb/bbl) / VOC Emission Factor (lb/bbl)
Emission Rates (pph) = VOC Emission Rate (pph) x HAP Mass Fraction
Emission Rates (tpy) = VOC Emission Rate (tpy) x HAP Mass Fraction

# **Truck Loading (Produced Water) Emissions Calculations**

Unit Number: L1

Description: Truck Loading (Insignificant)

#### Vapor Pressure of Produced Water:

It is estimated that the true vapor pressure of produced water is approximately equal to the true vapor pressure of pure water. An estimate of the true vapor pressure for water is calculated using Antoine's equation (see AP-42, Section 7.1, Equation 1-25).

Maximum:		Average:	
Temperature =	77 °F	Temperature =	65 °F
log P = A - (B / (C + T))		log P = A - (B / (C + T))	
A = 8.07131 B = 1730.63 C = 233.426 T = P = mmHg	25.00 °C	A = 8.07131 B = 1730.63 C = 233.426 T = P = mmHg	18.33 °C
P = 10^(A - (B / (C + T))		P = 10^(A - (B / (C + T))	
P = P =	23.69 mmHg 0.4581 psi	P = P =	15.75 mmHg 0.3045 psi

Note: 760 mmHg = 14.7 psia

# **Storage Tank Emissions Calculations**

Unit Number: T1

Description: Produced Water Tank (Insignificant)

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

Throughput

210 bbl/turnoverTank capacityHarvest Four Corners, LLC12 turnover/yrTurnovers per yearHarvest Four Corners, LLC2,520 bbl/yrAnnual liquid throughputbbl/turnover x turnover/yr

#### **Emission Rates**

		Uncontrolled,
	Emission	Emission
Pollutant	Factor,	Rate,
	lb/bbl	tpy
VOC	0.262	3.30E-01
Benzene	0.007	8.82E-03
Ethylbenzene	0.0007	8.82E-04
n-Hexane	0.022	2.77E-02
Toluene	0.009	1.13E-02
Xylene	0.006	7.56E-03

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

# Section 6.a

# **Green House Gas Emissions**

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

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

# **Calculating GHG Emissions:**

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

CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O exhaust emissions were calculated using emission factors from 40 Code of Federal Regulations (CFR), Part C, Tables C-1 & C-2 and the combustion source higher heating value (HHV) design heat rates.

The SSM and malfunction CO<sub>2</sub> and CH<sub>4</sub> emissions from blowdown events were calculated from the annual blowdown volumes and gas composition.

The reciprocating compressor CO<sub>2</sub> and CH<sub>4</sub> emissions were calculated using a combination of equations W-26 & W-36 (from Subpart W).

#### **Green House Gas Emissions Data and Calculations**

		Facility Total Emissions							
Sources		CO2,	CH4,	N2O,	GHG,	CO2e,			
		tpy	tpy	tpy	tpy	tpy			
Engine & Turbine Exhaust		21,226.90	4.00E-01	4.00E-02	21,227.34	21248.82			
SSM Blowdowns		17.74	54.85		72.59	1388.91			
Reciprocating Compressor Venting		36.10	111.75		147.85	2829.83			
Equipment Leaks Emissions		2.52	7.80		10.32	197.62			
Malfunctions		55.45	171.39		226.84	4340.26			
	Total	21,338.71	346.19	4.00E-02	21,684.94	30,005.44			

### **Engine & Turbine Exhaust Emissions**

Unit		E	mission Factor	rs .	Emission Rates			
Numbers	Description	CO2,	CH4,	N2O,	CO2,	CH4,	N2O,	
		kg/MMBtu	kg/MMBtu	kg/MMBtu	tpy	tpy	tpy	
1	Superior 16SGTB	53.06	1.00E-03	1.00E-04	10,613.45	2.00E-01	2.00E-02	
2	Superior 16SGTB	53.06	1.00E-03	1.00E-04	10,613.45	2.00E-01	2.00E-02	
	Total				21,226.90	4.00E-01	4.00E-02	

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

				LHV	HHV	
Unit			Operating	Design	Design	Fuel
Numbers	Description	Fuel Types	Times,	Heat Rates,	Heat Rates,	Usages,
			hr/yr	MMBtu/hr	MMBtu/hr	MMBtu/yr
1	Superior 16SGTB	Nat. Gas	8,760	18.68	20.76	181,843
2	Superior 16SGTB	Nat. Gas	8,760	18.68	20.76	181,843

The fuel types and operating times are provided by Harvest

The LHV design heat rates are taken from manufacturers data

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

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

#### **SSM Blowdown Emissions**

Unit		Total	CO2 Emission	CH4 Emission	Emissio	n Rates
Numbers	Description	Gas Losses,	Factors,	Factors,	CO2,	CH4,
		scf/yr	lb/scf	lb/scf	tpy	tpy
SSM	SSM Blowdowns	3,019,250	0.0118	0.0363	17.74	54.85

The annual blowdown volumes are calculated from data provided by Harvest

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

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

#### **Reciprocating Compressor Venting Emissions**

Unit		Emission Rates			
Numbers	Description	CO2,	CH4,		
		tpy	tpy		
NA	Blowdown Valve Leakage	3.45	10.67		
NA	Rod Packing Emissions	32.65	101.07		
NA	Isolation Valve Leakage	0.00	0.00		
	Total	36.10	111.75		

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

Operating mode - includes rod packing emissions

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

Rod packing gas emissions assume 4 cylinders per compressor

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

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

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

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

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

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

#### **Green House Gas Emissions Data and Calculations**

Unit		Number of	Gas	Operating	CO2 Mole	CH4 Mole	CO2	CH4
Numbers	Description	Compressors	Emissions,	Times,	Percents,	Percents,	Density,	Density,
		#	scf/hr	hr/yr	%	%	kg/scf	kg/scf
NA	Blowdown Valve Leakage	2	33.5	8,760	10.13	85.94	0.0526	0.0192
NA	Rod Packing Emissions	2	317.2	8,760	10.13	85.94	0.0526	0.0192
NA	Isolation Valve Leakage	2	10.5	0	10.13	85.94	0.0526	0.0192

The number of compressors is provided by Harvest

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

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

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

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

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

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

#### **Equipment Leaks Emissions**

Unit		Emissio	sion Rates		
Numbers	Description	CO2,	CH4,		
		tpy	tpy		
NA	Valves	1.96	6.07		
NA	Connectors	2.30E-01	7.12E-01		
NA	Open-Ended Lines	1.40E-01	4.35E-01		
NA	Pressure Relief Valves	1.89E-01	5.84E-01		
	Total	2.52	7.80		

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

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

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

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

CH4 Emission Rate (tpy) = # x scf/hr/component x (CH4 Content (mole %) / 100) x hr/yr x CH4 Density (kg/scf) x (2,204.6 lb/tonne / 2,000 lb/ton) / 1,000 kg/tonne

Unit Numbers	Description	Number of Components,	Emission Factors, scf/hr /component	CO2 Contents, mole %	CH4 Contents, mole %	Operating Times, hr/yr	CO2 Density, kg/scf	CH4 Density, kg/scf
NA	Valves	315	0.121	10.13	85.94	8,760	0.0526	0.0192
NA	Connectors	263	0.017	10.13	85.94	8,760	0.0526	0.0192
NA	Open-Ended Lines	88	0.031	10.13	85.94	8,760	0.0526	0.0192
NA	Pressure Relief Valves	19	0.193	10.13	85.94	8,760	0.0526	0.0192

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

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

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

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

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

#### **Malfunction Emissions**

		Total	VOC	CO2	CH4			
Unit		Component	Component	Weight %	Weight %	I	Emission Rates	3
Number	Description	Weight,	Weight,	of Total,	of Total,	VOC,	CO2,	CH4,
		lb/lb-mole	lb/lb-mole	%	%	tpy	tpy	tpy
M1	Malfunctions	19.81	0.80	22.51	69.59	10.00	55.45	171.39

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

The VOC emission rate is estimated (see calculations workbook)

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

x (CO2 Weight % of Total (%) / 100)

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

#### **Green House Gas Emissions Data and Calculations**

#### **Gas Stream Composition**

				Weight	
	Mole	Molecular	Component	Percent	Emission
Components	Percents,	Weights,	Weights,	of Total,	Factors,
	%	lb/lb-mole	lb/lb-mole	%	lb/scf
Carbon Dioxide	10.1327	44.01	4.46	22.5141	0.0118
Hydrogen Sulfide	0.0000	34.07	0.00	0.0000	0.0000
Nitrogen	0.1567	28.01	0.04	0.2216	0.0001
Methane	85.9359	16.04	13.78	69.5917	0.0363
Ethane	2.3794	30.07	0.72	3.6123	0.0019
Propane	0.7862	44.09	0.35	1.7501	0.0009
IsoButane	0.1328	58.12	0.08	0.3897	0.0002
Normal Butane	0.1705	58.12	0.10	0.5003	0.0003
IsoPentane	0.0558	72.15	0.04	0.2033	0.0001
Normal Pentane	0.0402	72.15	0.03	0.1464	0.0001
Cyclopentane	0.0028	70.14	0.00	0.0099	0.0000
n-Hexane	0.0133	86.17	0.01	0.0579	0.0000
Cyclohexane	0.0097	84.16	0.01	0.0412	0.0000
Other Hexanes	0.0318	86.18	0.03	0.1384	0.0001
Heptanes	0.0187	100.20	0.02	0.0946	0.0000
Methylcyclohexane	0.0143	98.19	0.01	0.0709	0.0000
2,2,4-Trimethylpentane	0.0000	100.21	0.00	0.0000	0.0000
Benzene	0.0026	78.11	0.00	0.0103	0.0000
Toluene	0.0056	92.14	0.01	0.0261	0.0000
Ethylbenzene	0.0004	106.17	0.00	0.0021	0.0000
Xylenes	0.0050	106.17	0.01	0.0268	0.0000
C8+ heavies	0.1067	110.00	0.12	0.5926	0.0003
Total	100.0011		19.81	100.0000	0.0522
VOC			0.80		0.0021

Gas stream composition obtained from Middle Mesa VV extended gas analysis dated 3/12/2021
Component Weights (lb/lb-mole) = [Mole Percents (%) / 100] x Molecular Weights (lb/lb-mole)
Weight Percent of Total (%) = 100 x Component Weights (lb/lb-mole) / Total Component Weight (lb/lb-mole)
Emission Factors (lb/scf) = [Mole Percents (%) / 100] x Molecular Weights (lb/lb-mole) / 379.4 scf/lb-mole

# **Section 7**

# **Information Used To Determine Emissions**

#### **Information Used to Determine Emissions shall include the following:**

- ☐ If manufacturer data are used, include specifications for emissions units <u>and</u> control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
- If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
- ☑ If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
- $\square$  If an older version of AP-42 is used, include a complete copy of the section.
- ☑ If an EPA document or other material is referenced, include a complete copy.
- ☐ 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.

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

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

# **GRI GlyCalc Information**

Meter Number:

Meter Name:

W Middle Mess CS 3-12-2021

Location:

W Middle Nesa CS

Sample Date: File name

3/12/2021

VV Middle Mesa CS 3-12-2021\_1.D

Flow Pressure: 230

Flow Temp: 72 H20, Lb/MMCF: --

H2S, ppmmol: --

Type: Spot Pulled by: Greg Vogt

Component	Mol%	Wt%	LV%
Carbon Dioxide	10.1327	22.5027	9.9411
Hydrogen Sulfide	0.0000	0.0000	0.0000
Nitrogen	0.1667	0.2201	0.0985
Oxygen	0.0000	0.0000	0.0000
Methane	85.9359	69.5692	83,7544
Ethane	2.3794	3,5104	3.6582
Propene	0.7862	1.7495	1.2453
lsobutane	Q.132B	0.3895	0.2498
n-Butane	0.1705	0.5001	0.3090
Isopentene	0.0558	0.2031	0.1173
n-Pentane	0.0402	0.1463	0.0837
Cyclopentane	0.0028	0.0100	0.0048
n-Hexane	0.0133	0.0576	0.0313
Cyclohexane	0.0097 % VOCs	0.0412	0.0190
Other Hexanes	0.0318 1.3963	0.1373	0.0725
Heptanes	0.0187	0.0944	0.0488
Methylcyclohexane	0.0143	0.0710	0.0331
2,2,4 Trimethylpentane	0.0000	0.0000	0.0000
Benzene	0.0026	0.0101	0.0041
Toluene	0.0056	0.0260	0.0108
Ethylbenzene	0.0004	0.0023	0.0010
Xylenes	0.0080	0.0265	0.0110
C8+ Heavies	0.1067	0.6329	0.3065
Total	100.0000	100.0000	100.0000

Constants Used:

GPA Standard 2145-16 (FPS)

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

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

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

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

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

#### COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

Stationary Sources Program / Air Pollution Control Division

# **PS Memo 09-02**

To: Stationary Sources Program, Local Agencies, and Regulated Community

From: Chris Laplante and Roland C. Hea, Colorado Air Pollution Control Division

Date: February 8, 2010

**Subject:** Oil & Gas Produced Water Tank Batteries

**Regulatory Definitions and Permitting Guidance** 

This guidance document is intended to answer frequently asked questions concerning oil and gas industry produced water tank batteries. This document does not address any other equipment types that may be part of a common facility with a tank battery. Nothing in this guidance should be construed regarding Air Pollution Control Division (Division) permitting of evaporation ponds or water treatment facilities. Please consult with the Division for information regarding the permitting of evaporation ponds or water treatment facilities.

#### **Revision History**

October 1, 2009 Initial issuance.

February 8, 2010 First revision. This guidance document replaces the October 1, 2009

version. Revised language to clarify APEN fee structure, definition of

modification, APEN submittals, and produced water exemption.

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#### **Document source:**

https://www.colorado.gov/pacific/sites/default/files/AP\_Memo-09-02-Oil-\_-Gas-Produced-Water-Tank-Batteries-Regulatory-Definitions-and-Permitting-Guidance.pdf

# 3. EMISSION FACTORS AND SITE SPECIFIC SAMPLING Q&A

# 3.1. What are the State approved default emission factors for produced water tanks?

County	Produced Water Tank Default Emission Factors <sup>1</sup> (lb/bbl) <sup>2</sup>		
	VOC	Benzene	n-Hexane
Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson, Larimer, & Weld	0.262	0.007	0.022
Garfield, Mesa, Rio Blanco, & Moffat	0.178	0.004	0.010
Remainder of Colorado <sup>3</sup>	0.262	0.007	0.022

<sup>&</sup>lt;sup>1</sup> Testing may be performed at any site to determine site-specific emissions factors. These default emission factors may be revised by the Division in the future, pending approved data and testing results.

# 3.2. What type of emissions are included in the produced water tank state default emission factors?

State default emission factors for produced water tanks include flash, working, and breathing losses.

# 3.3. Are there limits as to when produced water tank state default emission factors may be used?

State default emission factors may be used at all oil and gas industry tank batteries. The Division intends to work with industry to refine emission factors and may develop separate emission factors for E&P and non-E&P sites.

#### 3.4. When are site-specific emission factors required for tank batteries?

Site-specific emission factors may be developed and used on a voluntary basis for any tank battery. The Division reserves the authority to require site-specific emission factors at any time. Site-specific emission factors may only be applied at the tank battery for which they were developed, unless otherwise approved by the Division.

# 3.5. How is a site-specific emission factor developed?

A site-specific emission factor for tank batteries is developed by performing a Division approved stack test. A test protocol must be submitted and approved by the Division prior to performing the test. Once a test protocol has been approved by the Division, subsequent testing may be performed following the approved protocol without submittal to the Division.

The Division must be notified of the site specific testing at least 30-days prior to the actual test date.

<sup>&</sup>lt;sup>2</sup> Units of lb/bbl means pounds of emissions per barrel of produced water throughput

<sup>&</sup>lt;sup>3</sup> For counties not listed in this table, use the emissions factors listed as a conservative measure or perform testing to determine a site-specific emission factor



Emission Factor Determination for Produced Water Storage Tanks

TCEQ Project 2010-29

Prepared for:
Texas Commission on Environmental Quality
Austin, Texas

Prepared by: ENVIRON International Corporation Novato, California

Date: August 2010

ENVIRON Project Number: 06-17477T

#### **Document source:**

https://www.tceq.texas.gov/assets/public/implementation/air/am/contracts/reports/ei/5820784005FY1024-20100830-environ-% 20EmissionFactorDeterminationForProducedWaterStorageTanks.pdf

# **Executive Summary**

The overall purpose of this Study is to evaluate volatile organic compounds (VOC), speciated VOC and hazardous air pollutant (HAP) emissions from produced water and/or saltwater storage tanks servicing oil and gas wells and to develop appropriate VOC and HAP emission factors. The emission factors are to be used for emission inventory development purposes.

The primary source of information for this study was testing conducted by the Texas Commission on Environmental Quality (TCEQ) under Work Order 522-7-84005-FY10-25, *Upstream Oil & Gas Tank Measurements*, TCEQ Project 2010-39. As part of this referenced testing project, pressurized produced water samples were taken at seven different tank batteries located in Johnson, Wise and Tarrant Counties, Texas (all part of the Eastern Barnett Shale region) and analyzed for flash gas volume and composition. The sample collection and analysis conducted as part of TCEQ Project 2010-39 was done according to strict sampling and quality assurance procedures. In addition to TCEQ Project 2010-39 data, a thorough review of publically-available information sources identified a limited amount of data on produced water emissions. This was supplemented by data provided by two natural gas producers and one petroleum engineering services company. Other than TCEQ Project 2010-39 data, however, it could not be confirmed that any of the data had undergone a rigorous quality assurance process and therefore is considered secondary data, used to support conclusions drawn using the primary data but not used directly in deriving the produced water emission factors.

Emissions from produced water storage tanks consist of flash emissions, working losses and breathing losses. Flash emissions are determined using flash gas analysis. Working and breathing losses are estimated using EPA TANKS 4.09d software. Using this approach and the assumptions detailed within this report, it is determined that working and breathing losses associated with primary data source sites are very small compared to flash emissions and can be ignored without affecting the overall emission factor determination.

Table ES-1 presents the recommended emission factors for VOC and four HAPs – benzene, toluene, ethylbenzene and xylenes – derived from the primary data source sites. For comparative purposes, average emissions from Texas and non-Texas secondary sites are also presented in Table ES-1.

Table ES-1. Recommended Emission Factors and Comparative Data

	Average Produced Water Emission Factor by Data Set (lb/bbl)		
Pollutant	Recommended Emission Factor	Secondary Data – Texas	Secondary Data – Non- Texas
VOC	0.01	0.012	0.18
Benzene	0.0001	0.0012	0.004
Toluene	0.0003	0.0012	0.009
Ethylbenzene	0.000006	0.0001	0.0007
Xylenes	0.00006	0.0003	0.006

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

#### GLOBAL WARMING POTENTIALS

[100-Year Time Horizon]

Name	CAS No.	Chemical formula	Global warming potential (100 yr.)
Carbon dioxide	124-38-9	$CO_2$	1
Methane	74-82-8	CH <sub>4</sub>	<sup>a</sup> 25
Nitrous oxide	10024-97-2	$N_2O$	<sup>a</sup> 298
HFC-23	75-46-7	CHF <sub>3</sub>	<sup>a</sup> 14,800
HFC-32	75-10-5	CH <sub>2</sub> F <sub>2</sub>	<sup>a</sup> 675
HFC-41	593-53-3	CH₃F	a92
HFC-125	354-33-6	C <sub>2</sub> HF <sub>5</sub>	<sup>a</sup> 3,500
HFC-134	359-35-3	C <sub>2</sub> H <sub>2</sub> F <sub>4</sub>	a1,100
HFC-134a	811-97-2	CH <sub>2</sub> FCF <sub>3</sub>	<sup>a</sup> 1,430
HFC-143	430-66-0	$C_2H_3F_3$	<sup>a</sup> 353
HFC-143a	420-46-2	$C_2H_3F_3$	<sup>a</sup> 4,470
HFC-152	624-72-6	CH₂FCH₂F	53
HFC-152a	75-37-6	CH <sub>3</sub> CHF <sub>2</sub>	a124
HFC-161	353-36-6	CH₃CH₂F	12
HFC-227ea	431-89-0	C <sub>3</sub> HF <sub>7</sub>	a3,220
HFC-236cb	677-56-5	CH <sub>2</sub> FCF <sub>2</sub> CF <sub>3</sub>	1,340
HFC-236ea	431-63-0	CHF <sub>2</sub> CHFCF <sub>3</sub>	1,370
HFC-236fa	690-39-1	$C_3H_2F_6$	a9,810
HFC-245ca	679-86-7	$C_3H_3F_5$	a693
HFC-245fa	460-73-1	CHF <sub>2</sub> CH <sub>2</sub> CF <sub>3</sub>	1,030
HFC-365mfc	406-58-6	CH <sub>3</sub> CF <sub>2</sub> CH <sub>2</sub> CF <sub>3</sub>	794
HFC-43-10mee	138495-42-8	CF <sub>3</sub> CFHCFHCF <sub>2</sub> CF <sub>3</sub>	<sup>a</sup> 1,640
Sulfur hexafluoride	2551-62-4	SF <sub>6</sub>	<sup>a</sup> 22,800
Trifluoromethyl sulphur pentafluoride	373-80-8	SF <sub>5</sub> CF <sub>3</sub>	17,700
Nitrogen trifluoride	7783-54-2	NF <sub>3</sub>	17,200
PFC-14 (Perfluoromethane)	75-73-0	CF <sub>4</sub>	<sup>a</sup> 7,390
PFC-116 (Perfluoroethane)	76-16-4	C <sub>2</sub> F <sub>6</sub>	<sup>a</sup> 12,200
PFC-218 (Perfluoropropane)	76-19-7	C <sub>3</sub> F <sub>8</sub>	a8,830
Perfluorocyclopropane	931-91-9	C-C <sub>3</sub> F <sub>6</sub>	17,340
PFC-3-1-10 (Perfluorobutane)	355-25-9	$C_4F_{10}$	a8,860
PFC-318 (Perfluorocyclobutane)	115-25-3	C-C <sub>4</sub> F <sub>8</sub>	a10,300
PFC-4-1-12 (Perfluoropentane)	678-26-2	$C_5F_{12}$	a9,160
PFC-5-1-14 (Perfluorohexane, FC-72)	355-42-0	$C_6F_{14}$	a9,300
PFC-9-1-18	306-94-5	$C_{10}F_{18}$	7,500
HCFE-235da2 (Isoflurane)	26675-46-7	CHF2OCHCICF3	350
HFE-43-10pccc (H-Galden 1040x, HG-11)	E1730133	CHF <sub>2</sub> OCF <sub>2</sub> OC <sub>2</sub> F <sub>4</sub> OCHF <sub>2</sub>	1,870

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HFE-125	3822-68-20	CHF <sub>2</sub> OCF <sub>3</sub>	14,900
HFE-134 (HG-00)	1691-17-4	CHF <sub>2</sub> OCHF <sub>2</sub>	6,320
HFE-143a	421-14-7	CH <sub>3</sub> OCF <sub>3</sub>	756
HFE-227ea	2356-62-9	CF <sub>3</sub> CHFOCF <sub>3</sub>	1,540
HFE-236ca12 (HG-10)	78522-47-1	CHF <sub>2</sub> OCF <sub>2</sub> OCHF <sub>2</sub>	2,800
HFE-236ea2 (Desflurane)	57041-67-5	CHF <sub>2</sub> OCHFCF <sub>3</sub>	989
HFE-236fa	20193-67-3	CF <sub>3</sub> CH <sub>2</sub> OCF <sub>3</sub>	487
HFE-245cb2	22410-44-2	CH <sub>3</sub> OCF <sub>2</sub> CF <sub>3</sub>	708
HFE-245fa1	84011-15-4	CHF <sub>2</sub> CH <sub>2</sub> OCF <sub>3</sub>	286
HFE-245fa2	1885-48-9	CHF <sub>2</sub> OCH <sub>2</sub> CF <sub>3</sub>	659
HFE-254cb2	425-88-7	CH <sub>3</sub> OCF <sub>2</sub> CHF <sub>2</sub>	359
HFE-263fb2	460-43-50	CF <sub>3</sub> CH <sub>2</sub> OCH <sub>3</sub>	11
HFE-329mcc2	134769-21-4	CF <sub>3</sub> CF <sub>2</sub> OCF <sub>2</sub> CHF <sub>2</sub>	919
HFE-338mcf2	156053-88-20	CF <sub>3</sub> CF <sub>2</sub> OCH <sub>2</sub> CF <sub>3</sub>	552
HFE-338pcc13 (HG-01)	188690-78-0	CHF <sub>2</sub> OCF <sub>2</sub> CF <sub>2</sub> OCHF <sub>2</sub>	1,500
HFE-347mcc3 (HFE-7000)	375-03-1	CH <sub>3</sub> OCF <sub>2</sub> CF <sub>2</sub> CF <sub>3</sub>	575
HFE-347mcf2	171182-95-9	CF <sub>3</sub> CF <sub>2</sub> OCH <sub>2</sub> CHF <sub>2</sub>	374
HFE-347pcf2	406-78-0	CHF <sub>2</sub> CF <sub>2</sub> OCH <sub>2</sub> CF <sub>3</sub>	580
HFE-356mec3	382-34-3	CH <sub>3</sub> OCF <sub>2</sub> CHFCF <sub>3</sub>	101
HFE-356pcc3	160620-20-2	CH <sub>3</sub> OCF <sub>2</sub> CF <sub>2</sub> CHF <sub>2</sub>	110
HFE-356pcf2	50807-77-7	CHF <sub>2</sub> CH <sub>2</sub> OCF <sub>2</sub> CHF <sub>2</sub>	265
HFE-356pcf3	35042-99-0	CHF <sub>2</sub> OCH <sub>2</sub> CF <sub>2</sub> CHF <sub>2</sub>	502
HFE-365mcf3	378-16-5	CF <sub>3</sub> CF <sub>2</sub> CH <sub>2</sub> OCH <sub>3</sub>	11
HFE-374pc2	512-51-6	CH <sub>3</sub> CH <sub>2</sub> OCF <sub>2</sub> CHF <sub>2</sub>	557
HFE-449s1 (HFE-7100)	163702-07-6	C <sub>4</sub> F <sub>9</sub> OCH <sub>3</sub>	297
Chemical blend	163702-08-7	(CF <sub>3</sub> ) <sub>2</sub> CFCF <sub>2</sub> OCH <sub>3</sub>	
HFE-569sf2 (HFE-7200)	163702-05-4	$C_4F_9OC_2H_5$	59
Chemical blend	163702-06-5	(CF <sub>3</sub> ) <sub>2</sub> CFCF <sub>2</sub> OC <sub>2</sub> H <sub>5</sub>	
Sevoflurane (HFE-347mmz1)	28523-86-6	CH <sub>2</sub> FOCH(CF <sub>3</sub> ) <sub>2</sub>	345
HFE-356mm1	13171-18-1	(CF <sub>3</sub> ) <sub>2</sub> CHOCH <sub>3</sub>	27
HFE-338mmz1	26103-08-2	CHF <sub>2</sub> OCH(CF <sub>3</sub> ) <sub>2</sub>	380
(Octafluorotetramethy-lene) hydroxymethyl group	NA	X-(CF <sub>2</sub> ) <sub>4</sub> CH(OH)-X	73
HFE-347mmy1	22052-84-2	CH <sub>3</sub> OCF(CF <sub>3</sub> ) <sub>2</sub>	343
Bis(trifluoromethyl)-methanol	920-66-1	(CF <sub>3</sub> ) <sub>2</sub> CHOH	195
2,2,3,3,3-pentafluoropropanol	422-05-9	CF <sub>3</sub> CF <sub>2</sub> CH <sub>2</sub> OH	42
PFPMIE (HT-70)	NA	CF <sub>3</sub> OCF(CF <sub>3</sub> )CF <sub>2</sub> OCF <sub>2</sub> OCF <sub>3</sub>	10,300

 $<sup>^{\</sup>mathrm{a}}$ The GWP for this compound is different than the GWP in the version of Table A-1 to subpart A of part 98 published on October 30, 2009.

Table C-1 to Subpart C of Part 98—Default CO<sub>2</sub> Emission Factors and High Heat Values for Various Types of Fuel

Default CO<sub>2</sub> Emission Factors and High Heat Values for Various Types of Fuel

Fuel type	Default high heat value	Default CO <sub>2</sub> emission factor
Coal and coke	mmBtu/short ton	kg CO₂/mmBtu
Anthracite	25.09	103.69
Bituminous	24.93	93.28
Subbituminous	17.25	97.17
Lignite	14.21	97.72
Coal Coke	24.80	113.67
Mixed (Commercial sector)	21.39	94.27
Mixed (Industrial coking)	26.28	93.90
Mixed (Industrial sector)	22.35	94.67
Mixed (Electric Power sector)	19.73	95.52
Natural gas	mmBtu/scf	kg CO₂/mmBtu
(Weighted U.S. Average)	$1.026 \times 10^{-3}$	53.06
Petroleum products	mmBtu/gallon	kg CO₂/mmBtu
Distillate Fuel Oil No. 1	0.139	73.25
Distillate Fuel Oil No. 2	0.138	73.96
Distillate Fuel Oil No. 4	0.146	75.04
Residual Fuel Oil No. 5	0.140	72.93
Residual Fuel Oil No. 6	0.150	75.10
Used Oil	0.138	74.00
Kerosene	0.135	75.20
Liquefied petroleum gases (LPG) <sup>1</sup>	0.092	61.71
Propane <sup>1</sup>	0.091	62.87
Propylene <sup>2</sup>	0.091	67.77
Ethane <sup>1</sup>	0.068	59.60
Ethanol	0.084	68.44
Ethylene <sup>2</sup>	0.058	65.96
Isobutane <sup>1</sup>	0.099	64.94
Isobutylene <sup>1</sup>	0.103	68.86
Butane <sup>1</sup>	0.103	64.77
Butylene <sup>1</sup>	0.105	68.72
Naphtha (<401 deg F)	0.125	68.02
Natural Gasoline	0.110	66.88
Other Oil (>401 deg F)	0.139	76.22
Pentanes Plus	0.110	70.02

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

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

 $<sup>^2</sup>Ethylene\ HHV$  determined at 41 °F (5 °C) and saturation pressure.

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

<sup>4</sup>Reporters subject to subpart X of this part that are complying with §98.243(d) or subpart Y of this part may only use the default HHV and the default CO<sub>2</sub> emission factor for fuel gas combustion under the conditions prescribed in \$98.243(d)(2)(i) and (d)(2)(ii) and \$98.252(a)(1) and (a)(2), respectively. Otherwise, reporters subject to subpart X or subpart Y shall use either Tier 3 (Equation C-5) or Tier 4.

<sup>5</sup>Use the following formula to calculate a wet basis HHV for use in Equation C-1:  $HHV_w = ((100 - M)/100)*HHV_d$ where  $HHV_w = wet$ basis HHV, M = moisture content (percent) and  $HHV_d = dry$  basis HHV from Table C-1.

[78 FR 71950, Nov. 29, 2013]



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Table C-2 to Subpart C of Part 98—Default CH<sub>4</sub> and N<sub>2</sub>O Emission Factors for Various Types of Fuel

Fuel type	Default CH₄ emission factor (kg CH₄/mmBtu)	$\begin{array}{c} \textbf{Default $N_2O$ emission factor (kg}\\ \textbf{$N_2O/mmBtu)} \end{array}$
Coal and Coke (All fuel types in Table C-1)	$1.1 \times 10^{-02}$	$1.6 \times 10^{-03}$
Natural Gas	$1.0 \times 10^{-03}$	$1.0 \times 10^{-04}$
Petroleum (All fuel types in Table C-1)	$3.0 \times 10^{-03}$	$6.0 \times 10^{-04}$
Fuel Gas	$3.0 \times 10^{-03}$	$6.0 \times 10^{-04}$
Municipal Solid Waste	$3.2 \times 10^{-02}$	$4.2 \times 10^{-03}$
Tires	$3.2 \times 10^{-02}$	$4.2 \times 10^{-03}$
Blast Furnace Gas	$2.2 \times 10^{-05}$	$1.0 \times 10^{-04}$
Coke Oven Gas	$4.8 \times 10^{-04}$	$1.0 \times 10^{-04}$
Biomass Fuels—Solid (All fuel types in Table C-1, except wood and wood residuals)	$3.2 \times 10^{-02}$	$4.2 \times 10^{-03}$
Wood and wood residuals	$7.2 \times 10^{-03}$	$3.6 \times 10^{-03}$
Biomass Fuels—Gaseous (All fuel types in Table C-1)	$3.2 \times 10^{-03}$	$6.3 \times 10^{-04}$
Biomass Fuels—Liquid (All fuel types in Table C-1)	$1.1 \times 10^{-03}$	$1.1 \times 10^{-04}$

Note: Those employing this table are assumed to fall under the IPCC definitions of the "Energy Industry" or "Manufacturing Industries and Construction". In all fuels except for coal the values for these two categories are identical. For coal combustion, those who fall within the IPCC "Energy Industry" category may employ a value of 1g of CH<sub>4</sub>/mmBtu.



# **Section 8**

# Map(s)

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

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

A topographic map of the area around the facility is provided in this section. Please see the following page.

HARVEST FOUR CORNERS, LLC - MIDDLE MESA VV COMPRESSOR STATION, San Juan Co., NM T 31 N, R 07 W, Sec. 10 269000m E. 270000m E. 271000m E. 272000m E. 273000m E. WGS84 Zone 13S 274000m E. 40 89000m N. € 500 ż 408800m Middle Mesa VV 6559 6622 Hole in Rock ż 40 **8** 7000m 6539 269000m E. 270000m E. 271000m E. 272000m E. 273000m E. WGS84 Zone 13S 274000m E. TN†MN 0.0 0.1 0.2 0.3 0.4 0.5 0.6 0.7 miles

0.0

0.5

1.0 km

8½°

05/23/22

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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.		
Not	ess otherwise allowed elsewhere in this document, the following items document proof of the applicant's Public ification. Please include this page in your proof of public notice submittal with checkmarks indicating which uments are being submitted with the application.	
Ne	w Permit and Significant Permit Revision public notices must include all items in this list.	
Te	chnical Revision public notices require only items 1, 5, 9, and 10.	
Per	the Guidelines for Public Notification document mentioned above, include:	
	A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC).	
	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.).	
	A copy of the property tax record (20.2.72.203.B NMAC).	
	A sample of the letters sent to the owners of record.	
	A sample of the letters sent to counties, municipalities, and Indian tribes.	
	A sample of the public notice posted and a verification of the local postings.	
	A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.	
	A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.	
	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.	
	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.	
	A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.	

Not applicable, since this is a Title V application.



## Written Description of the Routine Operations of the Facility

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

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The Middle Mesa VV Compressor Station is a production field facility that receives natural gas collected from production gathering fields via pipeline. The facility compresses the gas using compressors driven by natural gas-fired reciprocating internal combustion engines. The facility is also equipped with miscellaneous liquid storage tanks.

The facility will operate up to 24 hours per day, seven days per week, 52 weeks per year, 8,760 hours per year.



### **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): Middle Mesa VV Compressor Station – a natural gas compression facility B. Apply the 3 criteria for determining a single source: SIC Code: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, OR surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source. **☑** Yes □ No Common Ownership or Control: Surrounding or associated sources are under common ownership or control as this source. ✓ Yes □ No Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source. **☑** Yes □ No C. Make a determination: The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "YES" boxes should be checked. If in "A" above you evaluated other sources as well, you must check AT LEAST ONE of the boxes "NO" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. ☐ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):



## **Section 12.A**

## **PSD Applicability Determination for All Sources**

(Submitting under 20.2.72, 20.2.74 NMAC)

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.

		~		
Α.	This	fac	allity	V 1S.

	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.
П	an existing PSD Major Source that has had a major modification requiring a BACT analysis
	a new PSD Major Source after this modification.

- B. This facility [is or is not] one of the listed 20.2.74.501 Table I PSD Source Categories. The "project" emissions for this modification are [significant or not significant]. [Discuss why.] The "project" emissions listed below [do or do not] only result from changes described in this permit application, thus no emissions from other [revisions or modifications, past or future] to this facility. Also, specifically discuss whether this project results in "de-bottlenecking", or other associated emissions resulting in higher emissions. The project emissions (before netting) for this project are as follows [see Table 2 in 20.2.74.502 NMAC for a complete list of significance levels]:
  - a. NOx: XX.X TPYb. CO: XX.X TPYc. VOC: XX.X TPYd. SOx: XX.X TPYe. PM: XX.X TPY
  - f. PM10: XX.X TPY g. PM2.5: XX.X TPY h. Fluorides: XX.X TPY
  - . Lead: XX.X TPY
  - j. Sulfur compounds (listed in Table 2): XX.X TPY
  - k. GHG: XX.X TPY
- C. Netting [is required, and analysis is attached to this document.] OR [is not required (project is not significant)] OR [Applicant is submitting a PSD Major Modification and chooses not to net.]
- D. BACT is [not required for this modification, as this application is a minor modification.] OR [required, as this application is a major modification. List pollutants subject to BACT review and provide a full top down BACT determination.]
- E. If this is an existing PSD major source, or any facility with emissions greater than 250 TPY (or 100 TPY for 20.2.74.501 Table 1 PSD Source Categories), determine whether any permit modifications are related, or could be considered a single project with this action, and provide an explanation for your determination whether a PSD modification is triggered.

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## **Section 12.B**

## **Special Requirements for a PSD Application**

(Submitting under 20.2.74 NMAC)

## <u>Prior</u> to Submitting a PSD application, the permittee shall:

the final determination regarding BACT is made, as this determination can ultimately affect information to provided in the application. A pre-application meeting is recommended to discuss the requirements of the BA analysis.    Submit a modeling protocol prior to submitting the permit application. [Except for GHG]   Submit the monitoring exemption analysis protocol prior to submitting the application. [Except for GHG]    For PSD applications, the permittee shall also include the following:    Documentation containing an analysis on the impact on visibility. [Except for GHG]   Documentation containing an analysis on the impact on vegetation, including state and federal threatened endangered species. [Except for GHG]   Documentation containing an analysis on the impact on water consumption and quality. [Except for GHG]   Documentation containing an analysis on the impact on water consumption and quality. [Except for GHG]   Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and proven the state of the state of the site has been notified and proven the state of the state of the state of the site has been notified and proven the state of the stat		
□ Submit the monitoring exemption analysis protocol prior to submitting the application. [Except for GHG]  For PSD applications, the permittee shall also include the following:  □ Documentation containing an analysis on the impact on visibility. [Except for GHG]  □ Documentation containing an analysis on the impact on soil. [Except for GHG]  □ Documentation containing an analysis on the impact on vegetation, including state and federal threatened endangered species. [Except for GHG]  □ Documentation containing an analysis on the impact on water consumption and quality. [Except for GHG]  □ Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and prove a copy of the application, including the BACT and modeling results. The name of any Class I Federal area loce		Submit the BACT analysis for review prior to submittal of the application. No application will be ruled complete until the final determination regarding BACT is made, as this determination can ultimately affect information to be provided in the application. A pre-application meeting is recommended to discuss the requirements of the BACT analysis.
For PSD applications, the permittee shall also include the following:  Documentation containing an analysis on the impact on visibility. [Except for GHG]  Documentation containing an analysis on the impact on soil. [Except for GHG]  Documentation containing an analysis on the impact on vegetation, including state and federal threatened endangered species. [Except for GHG]  Documentation containing an analysis on the impact on water consumption and quality. [Except for GHG]  Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and prove a copy of the application, including the BACT and modeling results. The name of any Class I Federal area loc		Submit a modeling protocol prior to submitting the permit application. [Except for GHG]
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<ul> <li>□ Documentation containing an analysis on the impact on soil. [Except for GHG]</li> <li>□ Documentation containing an analysis on the impact on vegetation, including state and federal threatened endangered species. [Except for GHG]</li> <li>□ Documentation containing an analysis on the impact on water consumption and quality. [Except for GHG]</li> <li>□ Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and prov a copy of the application, including the BACT and modeling results. The name of any Class I Federal area loc</li> </ul>	For P	SD applications, the permittee shall also include the following:
<ul> <li>□ Documentation containing an analysis on the impact on vegetation, including state and federal threatened endangered species. [Except for GHG]</li> <li>□ Documentation containing an analysis on the impact on water consumption and quality. [Except for GHG]</li> <li>□ Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and prov a copy of the application, including the BACT and modeling results. The name of any Class I Federal area loc</li> </ul>		Documentation containing an analysis on the impact on visibility. [Except for GHG]
endangered species. [Except for GHG]  □ Documentation containing an analysis on the impact on water consumption and quality. [Except for GHG]  □ Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and prov a copy of the application, including the BACT and modeling results. The name of any Class I Federal area loc		Documentation containing an analysis on the impact on soil. [Except for GHG]
☐ Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and prov a copy of the application, including the BACT and modeling results. The name of any Class I Federal area loc		Documentation containing an analysis on the impact on vegetation, including state and federal threatened and endangered species. [Except for GHG]
a copy of the application, including the BACT and modeling results. The name of any Class I Federal area loc		Documentation containing an analysis on the impact on water consumption and quality. [Except for GHG]
		Documentation that the federal land manager of a Class I area within 100 km of the site has been notified and provided a copy of the application, including the BACT and modeling results. The name of any Class I Federal area located within one hundred (100) kilometers of the facility.

Not applicable, since this is a Title V application.

## **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: <a href="http://cfpub.epa.gov/adi/">http://cfpub.epa.gov/adi/</a>

### **State Regulations**

Applicable state requirements are embodied in the New Mexico SIP, the New Mexico Administrative Code (NMAC), and the terms and conditions of any preconstruction permits issued pursuant to regulations promulgated through rulemaking under Title I of the CAA.

### **Table for STATE REGULATIONS:**

Table for STATE REGULATIONS:						
STATE REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:		
20.2.1 NMAC	General Provisions	Yes	Facility	This regulation is applicable because it establishes procedures for protecting confidential information, procedures for seeking a variance, NMAQB's authority to require sampling equipment, severability, and the effective date for conformance with the NMACs, and prohibits the violation of other requirements in attempting to comply with the NMACs.		
				Although this regulation is applicable, it does not impose any specific requirements.		
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	This is a State Implementation Plan (SIP) approved regulation that limits the maximum allowable concentrations of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.		
20.2.7 NMAC	Excess Emissions	Yes	Facility	This regulation is applicable because it prohibits excess emissions unless proper notification procedures are followed.		
20.2.8 NMAC	Emissions Leaving New Mexico	Yes	Facility	This regulation is applicable because it establishes prohibitions on the release of pollutants that cross New Mexico State boundaries.		
20.2.14 NMAC	Particulate Emissions from Coal Burning Equipment	No	N/A	This regulation is not applicable because the facility does not burn coal (see 20.2.14.5 NMAC).		
20.2.18 NMAC	Oil Burning Equipment - Particulate Matter	No	N/A	This regulation is not applicable because the facility does not burn oil (see 20.2.18.5 NMAC).		
20.2.31 NMAC	Coal Burning Equipment – Sulfur Dioxide	No	N/A	This regulation is not applicable because the facility does not burn coal (see 20.2.31.6 NMAC).		
20.2.32 NMAC	Coal Burning Equipment – Nitrogen Dioxide,	No	N/A	This regulation is not applicable because the facility does not burn coal (see 20.2.32.6 NMAC).		
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	This regulation is not applicable because the facility is not equipped with external gas burning equipment which have heat input rates exceeding the trigger level (one million MMBtu/year) established by the regulation (see 20.2.33.108 NMAC).		
20.2.34 NMAC	Oil Burning Equipment: NO <sub>2</sub>	No	N/A	This regulation is not applicable because the facility does not burn oil (see 20.2.34.6 NMAC).		
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This regulation is not applicable because the facility is not a natural gas processing plant (see 20.2.35.6 NMAC).		
20.2.38 NMAC	Hydrocarbon Storage Facility	No	N/A	This regulation is not applicable because the facility does not store hydrocarbons containing hydrogen sulfide, nor is there a tank battery storing hydrocarbon liquids with a capacity greater than or equal to 65,000 gallons (see 20.2.38.112 NMAC).		
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This regulation is not applicable because the facility is not equipped with a sulfur recovery plant (see 20.2.39.6 NMAC).		

STATE REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	1 & 2	This regulation is applicable because the facility is equipped with stationary combustion sources. Emissions from these combustion sources are limited to less than 20% opacity (see 20.2.61.109 NMAC). The regulation is not applicable to Title V insignificant heaters (see 20.2.61.111.D NMAC).
20.2.70 NMAC	Operating Permits	Yes	Facility	This regulation is applicable because the facility is a major source of CO emissions (see 20.2.70.200 NMAC).
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This regulation is applicable because the facility is subject to 20.2.70 NMAC (see 20.2.71.6 NMAC).
20.2.72 NMAC	Construction Permits	Yes	Facility	This regulation is applicable because the facility has potential emission rates (PER) greater than 10 pph or 25 tpy for pollutants subject to a state or federal ambient air quality standards (does not include VOCs or HAPs).
20.2.73	NOI & Emissions	Yes	Facility	The Notice of Intent portion of this regulation is not applicable because the facility is subject to 20.2.72 NMAC.
NMAC	Inventory Requirements	Yes	Facility	The emissions inventory portion of this regulation is applicable since the facility is a Title V major source (see 20.2.73.300.B(1) & (2)).
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	N/A	This regulation is not applicable because the facility is not a PSD major source.
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	This regulation is applicable because the facility is subject to 20.2.72 NMAC and it establishes the fee schedule associated with the filing of construction permits (see 20.2.75.6 NMAC).
20.2.77 NMAC	New Source Performance	No	N/A	This regulation is not applicable because it adopts by reference the federal NSPS codified in 40 CFR 60 (see 20.2.77.6 NMAC). The facility is not subject to 40 CFR 60.
20.2.78 NMAC	Emission Standards for HAPS	No	N/A	This regulation is not applicable because it incorporates by reference the NESHAPs codified under 40 CFR 61 (see 20.2.78.6 NMAC). The facility is not subject to 40 CFR 61.
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	This regulation is not applicable because the facility is neither located in nor has a significant impact on a nonattainment area (see 20.2.79.6 NMAC).
20.2.80 NMAC	Stack Heights	No	N/A	This regulation is not applicable because it establishes guidelines for the selection of an appropriate stack height for the purpose of atmospheric dispersion modeling (see 20.2.80.6 NMAC); however, it only imposes those requirements when modeling is required as a part of the application. This application does not require modeling.
20.2.82 NMAC	MACT Standards for Source Categories of HAPS	Yes	1 & 2	This regulation is applicable because it adopts by reference the federal MACT Standards for source categories codified in 40 CFR 63 (see 20.2.82.6 NMAC). The facility is subject to 40 CFR 63 Subparts A & ZZZZ.

### **Federal Regulations**

Federal standards and requirements are embodied in Title 40 (Protection of the Environment), Subchapter C (Air Programs) of the CFR, Parts 50 through 99.

### FEDERAL REGULATIONS APPLICABILITY CHECKLIST

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 50	NAAQS	Yes	Facility	This regulation is applicable because it applies to all sources in the state of New Mexico.
40 CFR 52	Approval and Promulgation of Implementation Plans	No	N/A	40 CFR 52.21 Prevention of Significant Deterioration of Air Quality is not applicable because the facility is not a major Prevention of Significant Deterioration source. The remainder of 40 CFR 52 is not applicable because it addresses approval and promulgation of implementation plans.
NSPS 40 CFR 60, Subpart A	General Provisions	No	N/A	This regulation is not applicable because no other 40 CFR Part 60 subparts apply.
NSPS 40 CFR 60, Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978	No	N/A	This regulation is not applicable because the petroleum liquids storage tanks at the facility have capacities less than the minimum applicability threshold capacity of 40,000 gallons (see §60.110(a)).
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	No	N/A	This regulation is not applicable because the storage tanks at the facility have capacities less than the minimum applicability threshold capacity of 40,000 gallons (see §60.110a(a)).
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	No	N/A	This regulation is not applicable because all storage tanks at the facility have capacities less than the minimum applicability threshold capacity of 75 cubic meters (19,812 gallons) or they have a capacity between 75 and 151 cubic meters (40,000 gallons) and store a liquid with a maximum true vapor pressure less than 15.0 kPa (2.2 psi) (see §60.110b(a) & §60.110b(b))).

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
NSPS 40 CFR 60, Subpart KKK	Standards of Performance for Equipment Leaks of VOC from Onshore Gas Plants	No	N/A	This regulation is not applicable because the facility is not an onshore natural gas processing plant as defined by the subpart (see §60.630(a)(1)). Natural gas processing plant (gas plant) means any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both (see §60.631).
NSPS 40 CFR 60, Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO <sub>2</sub> Emissions	No	N/A	This regulation is not applicable because the facility is not a natural gas processing plant as defined by the subpart. It is not equipped with a sweetening unit (see §60.640(a)).
NSPS 40 CFR 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal	No	N/A	This regulation is not applicable because the facility is not equipped with stationary compression ignition (CI) internal combustion engines (ICE) that commenced construction after July 11, 2005 and were manufactured after April 1, 2006 (see §60.4200(a)(2)(i)).
	Combustion Engines			For the purpose of this subpart, construction commences on the date the engine is ordered by the owner or operator (see §60.4200(a)).
NSPS	Standards of Performance for Stationary Spark Ignition Internal Combustion	No	N/A	This regulation is not applicable because the facility is not equipped with spark ignition (SI) internal combustion engines (ICE) constructed, modified, or reconstructed after June 12, 2006.
40 CFR 60, Subpart JJJJ				Units 1 & 2 were constructed prior to the applicability date and have not been modified or reconstructed.
	Engines			See the definitions of construction, modification, and reconstruction referenced in Subpart OOOO below.
	Standards of Performance for		N/A	This regulation is not applicable because the facility is not equipped with "affected" sources that commenced construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015: gas wells, centrifugal or reciprocating compressors, pneumatic controllers, and storage vessels (see §60.5365).
	Crude Oil and Natural Gas			Note that the facility is not a natural gas processing plant as defined by the subpart (see §60.5430).
NSPS	Production, Transmission, and Distribution for			Commenced construction means a continuous program of fabrication, erection or installation (see §60.2).
40 CFR 60, Subpart OOOO	which Construction, Modification or Reconstruction Commenced After August 23, 2011 and On or Before September 18, 2015			Modification means any physical change in or change in the method of operation of an existing facility which increases emissions or results in new emissions (see §60.2). The following, by themselves, are not modifications: routine maintenance, repair or replacement, production increase without capital expenditure, increase in hours of operation, addition of emission controls, or the relocation or change in ownership of an existing facility (see §60.14).
				Reconstruction means the replacement of components of an existing facility such that the fixed capital cost of the new components exceeds 50 % of the fixed capital cost required to construct a comparable entirely new facility. Fixed capital cost means the capital needed to provide all the depreciable components (see §60.15).

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
	Standards of			This regulation is not applicable because the facility is not equipped with "affected" sources that commenced construction, modification or reconstruction after September 18, 2015: gas wells, centrifugal or reciprocating compressors, pneumatic controllers, storage vessels, sweetening units, pneumatic pumps, and equipment leaks (see §60.5365a).
	Performance for Crude Oil and Natural Gas			In general, this regulation may apply if existing affected equipment is replaced or new affected equipment is installed.
NSPS 40 CFR 60, Subpart OOOOa	Facilities for which Construction, Modification or Reconstruction Commenced After September 18,	No	N/A	In particular, this regulation will apply to fugitive emissions components at the facility if any engines and compressors are installed. Fugitive components monitoring is required if a compressor station is modified. For the purpose of fugitive components monitoring as required by this subpart, modification of a compressor station is the addition of a compressor or replacement of a compressor with a larger unit (greater total horsepower) (see §60.5365a(j)).
	2015			Note that the facility is not a natural gas processing plant as defined by the subpart (see §60.5430a).
				See the definitions of construction, modification, and reconstruction referenced in Subpart OOOO above.
NESHAP 40 CFR 61, Subpart A	General Provisions	No	N/A	This regulation is not applicable because no other 40 CFR Part 61 subparts apply (see §61.01(c)).
NESHAP 40 CFR 61, Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	No	N/A	This regulation is not applicable because none of the listed equipment at the facility is in VHAP service.  The provisions of this subpart apply to each of the following sources that are intended to operate in volatile hazardous air pollutant (VHAP) service: pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and control devices or systems required by this subpart (see §61.240(a)). VHAP service means a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 10 percent by weight of VHAP. VHAP means a substance regulated under this subpart for which a standard for equipment leaks of the substance has been promulgated (see §61.241).
MACT 40 CFR 63, Subpart A	General Provisions	Yes	1 & 2	This regulation is applicable because 40 CFR 63 Subpart ZZZZ applies (see §63.1(b)).
MACT 40 CFR 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants For Oil and Natural Gas Production Facilities	No	N/A	This regulation is not applicable because the facility is not equipped with affected equipment.  The facility is an area HAP source. Note that since it is a production field facility (located prior to the point of custody transfer), only HAP emissions from glycol dehydration units and storage vessels are aggregated for a major source determination. Storage vessels include crude oil tanks, condensate tanks, intermediate hydrocarbon liquid tanks, and produced water tanks (see §63.761).  At area HAP facilities, the regulation is only applicable to dehydrators (see §63.760(b)(2)).
MACT 40 CFR 63, Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities	No	N/A	This regulation is not applicable because the facility is not a natural gas transmission and storage facility as defined by the subpart.  A compressor station that transports natural gas prior to the point of custody transfer or to a natural gas processing plant (if present) are not considered a part of the natural gas transmission and storage source category (see §63.1270(a)).

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
MACT 40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	1 & 2	This regulation is applicable because the facility is equipped with affected sources.  The station is an area HAP source as defined by the subpart. For production field facilities, only HAP emissions from engines, turbines, dehydrators, and storage vessels with the potential for flash emissions are aggregated for the HAP major source determination (see §63.6675).  Units 1 & 2 are 4-stroke, lean burn (4SLB) spark ignition (SI) RICE with a site rating of more than 500 hp, and were constructed prior to December 19, 2002.
MACT 40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	No	N/A	This regulation is not applicable both because the facility is an area HAP source as defined by the subpart (see §63.7480) and is not equipped with boilers and process heaters.  Since the facility is a natural gas production facility, only HAP emissions from dehydrators and storage vessels with the potential for flash emissions are aggregated for a major source determination (see §63.7575).
MACT 40 CFR 63, Subpart JJJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at Area Sources	No	N/A	This regulation is not applicable because the facility is not equipped with industrial, commercial, or institutional boilers.
40 CFR 64	Compliance Assurance Monitoring	No	N/A	This regulation is not applicable because no equipment at the facility requires a control device to achieve compliance with emission limits or standards where pre control emissions equal or exceed the major source threshold (100 tons per year). (see §64.2(a)).
40 CFR 68	Chemical Accident Prevention	No	N/A	This regulation is not applicable because the facility does not store any of the identified toxic and flammable substances in quantities exceeding the applicability thresholds (see §68.10(a), §68.115(a), and §68.130 Tables 1-4).
40 CFR 70	State Operating Permit Programs	No	N/A	This regulation is not applicable, as the requirements associated with Title V are delegated to the State of New Mexico and implemented under 20 NMAC 2.70.
40 CFR 82	Protection of Stratospheric Ozone	No	N/A	This regulation is not applicable because the facility does not produce, transform, destroy, import, or export ozone-depleting substances (see §82.1(b),); does not service motor vehicle air conditioning units (see §82.30(b)); and does not sell, distribute, or offer for sale or distribution any product that contains ozone-depleting substances (see §82.64).



## **Operational Plan to Mitigate Emissions**

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

- ▼ Title V Sources (20.2.70 NMAC): By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ▼ NSR (20.2.72 NMAC), PSD (20.2.74 NMAC) & Nonattainment (20.2.79 NMAC) Sources: By checking this box and certifying this application the permittee certifies that it has developed an <u>Operational Plan to Mitigate Source Emissions</u>

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

Form-Section 14 last revised: 8/15/2011 Section 14, Page 1 Saved Date: 6/15/2022



## **Section 15**

## **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.

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Not applicable, as there are no alternative operating scenarios at this facility.



## **Air Dispersion Modeling**

\_\_\_\_\_

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

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC).	
See #1 above. <b>Note:</b> Neither modeling nor a modeling waiver is required for VOC emissions.	
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3	X
above.	Α
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 that applies:

Ш	See attached, approved modeling <b>waiver for all</b> 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 modeling report for some pollutants from the facility.
M	No modeling is required

Harvest took over operation of this facility on April 1, 2021. It is not known when modeling was last conducted.



## **Compliance Test History**

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

### **Compliance Test History Table**

Unit No.	Test Description	Test Date			
1	Annual NOx and CO testing in accordance with Title V operating permit Condition A201.A				
2	Annual NOx and CO testing in accordance with Title V operating permit Condition A201.A	July 2020			

Calendar year 2021 testing had not been completed by Harvest prior to the April 1, 2021 shutdown. The July 2020 testing was conducted by the previous owner.



## **Addendum for Streamline Applications**

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

Not applicable, as this is not a streamline application.

Form-Section 18 last revised: 3/9/2012 (2<sup>nd</sup> sentence) Section 18, Page 1 Saved Date: 6/15/2022



## **Section 19**

## **Requirements for Title V Program**

### **Who Must Use this Attachment:**

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

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

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

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

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

Form-Section 19 last revised: 8/15/2011

Describe the facility's compliance status with each applicable requirement at the time this permit application is submitted. This statement should include descriptions of or references to all methods used for determining compliance. This statement should include descriptions of monitoring, recordkeeping and reporting requirements and test methods used to determine compliance with all applicable requirements. Refer to Section 2, Tables 2-N and 2-O of the Application Form as necessary. (20.2.70.300.D.11 NMAC) For facilities with existing Title V permits, refer to most recent Compliance Certification for existing requirements. Address new requirements such as CAM, here, including steps being taken to achieve compliance.

The facility is in compliance with all applicable requirements, as has been demonstrated by the most recent semi-annual monitoring reports and annual compliance certification. It is assumed that compliance with the Title V operating permit ensures compliance with the construction permit and New Mexico regulations.

### **19.3 - Continued Compliance** (20.2.70.300.D.10.c NMAC)

Provide a statement that your facility will continue to be in compliance with requirements for which it is in compliance at the time of permit application. This statement must also include a commitment to comply with other applicable requirements as they come into effect during the permit term. This compliance must occur in a timely manner or be consistent with such schedule expressly required by the applicable requirement.

The facility will continue to be in compliance with applicable requirements for which it is in compliance at the time of this permit application. In addition, Harvest will, in a timely manner or consistent with such schedule expressly required by the applicable requirement, comply with other applicable requirements as they come into effect during the permit term.

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### **19.4 - Schedule for Submission of Compliance** (20.2.70.300.D.10.d NMAC)

You must provide a proposed schedule for submission to the department of compliance certifications during the permit term. This certification must be submitted annually unless the applicable requirement or the department specifies a more frequent period. A sample form for these certifications will be attached to the permit.

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The submittal of compliance certifications during the five-year term of the operating permit will occur annually.

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### 19.5 - Stratospheric Ozone and Climate Protection

In addition to completing the four (4) questions below, you must submit a statement indicating your source's compliance status with requirements of Title VI, Section 608 (National Recycling and Emissions Reduction Program) and Section 609 (Servicing of Motor Vehicle Air Conditioners).

1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-

- depleting substances? 

  | Ves | No
- 2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? ☐ Yes ☑ No

(If the answer is yes, describe the type of equipment and how many units are at the facility.)

- 3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? ☐ Yes ☑ No
- 4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G). **None**

The facility does not produce, manufacture, transform, destroy, import, or export any stratospheric ozonedepleting substances (CFCs, HCFCs); does not maintain or service motor vehicle air conditioning units or refrigeration equipment; and does not sell, distribute, or offer for sale any product that may contain

stratospheric ozone-depleting substances.

Harvest shall continue to maintain compliance with the conditions stipulated in 40 CFR 82, Subparts A-G of the Stratospheric Ozone Protection Program (Title VI of the Clean Air Act Amendments).

### 19.6 - Compliance Plan and Schedule

Applications for sources, which are not in compliance with all applicable requirements at the time the permit application is submitted to the department, must include a proposed compliance plan as part of the permit application package. This plan shall include the information requested below:

### A. Description of Compliance Status: (20.2.70.300.D.11.a NMAC)

A narrative description of your facility's compliance status with respect to all applicable requirements (as defined in 20.2.70 NMAC) at the time this permit application is submitted to the department.

### **B.** Compliance plan: (20.2.70.300.D.11.B NMAC)

A narrative description of the means by which your facility will achieve compliance with applicable requirements with which it is not in compliance at the time you submit your permit application package.

### C. Compliance schedule: (20.2.70.300D.11.c NMAC)

A schedule of remedial measures that you plan to take, including an enforceable sequence of actions with milestones, which will lead to compliance with all applicable requirements for your source. This schedule of compliance must be at least as stringent as that contained in any consent decree or administrative order to which your source is subject. The obligations of any consent decree or administrative order are not in any way diminished by the schedule of compliance.

### **D.** Schedule of Certified Progress Reports: (20.2.70.300.D.11.d NMAC)

A proposed schedule for submission to the department of certified progress reports must also be included in the compliance schedule. The proposed schedule must call for these reports to be submitted at least every six (6) months.

### E. Acid Rain Sources: (20.2.70.300.D.11.e NMAC)

If your source is an acid rain source as defined by EPA, the following applies to you. For the portion of your acid rain source subject to the acid rain provisions of title IV of the federal Act, the compliance plan must also include any additional requirements under the acid rain provisions of title IV of the federal Act. Some requirements of title IV regarding the schedule and methods the source will use to achieve compliance with the acid rain emissions limitations may supersede the requirements of title V and 20.2.70 NMAC. You will need to consult with the Air Quality Bureau permitting staff concerning how to properly meet this requirement.

**NOTE**: The Acid Rain program has additional forms. See <a href="http://www.env.nm.gov/aqb/index.html">http://www.env.nm.gov/aqb/index.html</a>. Sources that are subject to both the Title V and Acid Rain regulations are **encouraged** to submit both applications **simultaneously**.

The facility is in compliance with all applicable requirements; consequently, a compliance plan, a compliance schedule, and a schedule of certified progress reports is not required.

The facility is not equipped with any acid rain sources; consequently, compliance with the acid rain provisions is not required as a part of this permit application.

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### 19.7 - 112(r) Risk Management Plan (RMP)

Any major sources subject to section 112(r) of the Clean Air Act must list all substances that cause the source to be subject to section 112(r) in the application. The permittee must state when the RMP was submitted to and approved by EPA.

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The facility is not subject to 40 CFR 68, Chemical Accident Prevention Provisions; consequently, a Risk Management Plan is not required.

#### 19.8 - Distance to Other States, Bernalillo, Indian Tribes and Pueblos

Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B NMAC)?

(If the answer is yes, state which apply and provide the distances.)

The facility is located within 80 kilometers of the following states, local pollution control programs, Indian tribes and pueblos:

Colorado (≈10.3 km) Jicarilla Apache Reservation (≈32.7 km) Navajo Indian Reservation (≈63 km) Southern Ute Tribe (≈10.3 km) Ute Mountain Indian Reservation (≈57.9 km)

### 19.9 - Responsible Official

Provide the Responsible Official as defined in 20.2.70.7.AD NMAC:

The responsible official is Travis Jones.

### **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.

Not applicable, as no other relevant information is being provided.



## **Addendum for Landfill Applications**

Landfill Applications are not required to complete Sections 1-C Input Capacity and Production Rate, 1-E Operating Schedule, 17 Compliance Test History, and 18 Streamline Applications. Section 12 – PSD Applicability is required only for Landfills with Gas Collection and Control Systems and/or landfills with other non-fugitive stationary sources of air emissions such as engines, turbines, boilers, heaters. All other Sections of the Universal Application Form are required.

EPA Background Information for MSW Landfill Air Quality Regulations: <a href="https://www3.epa.gov/airtoxics/landfill/landflpg.html">https://www3.epa.gov/airtoxics/landfill/landflpg.html</a>

NM Solid Waste Bureau Website: <a href="https://www.env.nm.gov/swb/">https://www.env.nm.gov/swb/</a>

Not applicable, as the facility is not a landfill.



# **Section 22: Certification**

Company Name: Harvest Four Corners, LLC	
I, <u>Travis Jones</u> , hereby certify that the information and data submitted in this to the best of my knowledge and professional expertise and experience.	application are true and as accurate as possible
Signed this day of _June, 2022, upon my oath or affirmation, before a nota	ary of the State of
TEXAS.	
*Signature	<u>6/3/2022</u> Date
Travis Jones Printed Name	EHS Manager Title
Scribed and sworn before me on this 3 day of June, 2022.	AMY HEROD  Notary Public, State of Texas  Comm. Expires 02-24-2024  Notary ID 132371315
My authorization as a notary of the State of Texas	expires on the
24th day of February, 2024.	
Notary's Signature  AMY Hen Cl  Notary's Printed Name	6 3 7022 Date

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