

August 11, 2017

via FedEx

Ms. Liz Bisbey-Kuehn New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, NM 87505

Subject: Initial Air Permit Application Occidental Chemical Corporation Aventine Terminal Loving, Eddy County, New Mexico

Dear Ms. Bisbey-Kuehn:

Occidental Chemical Corporation (OxyChem) is submitting this initial permit application to authorize the construction of emission sources at the Aventine Terminal. The terminal will receive muriatic acid in railcars.

In accordance with 20.2.72.203 NMAC, enclosed are the appropriate NMED application forms with supporting documentation, a copy of the public notice provided via mailings, radio and newspaper notices per 20.2.72.203.B NMAC, and a check for five hundred dollars (\$500) to cover the permit application filing fee. Enclosed is an extra copy of the application and two CD's with all of the electronic files.

We would like to thank you in advance for your review and concurrence with this permit application. If you have any questions regarding the information presented in this application, please do not hesitate to contact me at (972) 404-3291 or via email at Barbara\_Alkis@oxy.com.

Sincerely,

anten de

Barbara Alkis Manager Air Programs



PAYMENT DOCUMENT 2001719833



#### NEW MEXICO ENVIRONMENT DEPT 525 CAMINO DE LOS MARQUEZ STE 1 SANTA FE NM 87505

CHECK NO. 0000969291	DATE 08/02/2017				
185071					
NET	DISCOUNT	PO NUMBER	COMPANY CODE	INVOICE/CREDIT MEMO	DATE
500.00			300	080117	8/1/2017
*******500.00		TOTAL >	IBED ABOVE	ECK IS IN PAYMENT FOR ITEMS DESCR	E ATTACHED CH



Bank of America 64-1278 / 611 GA

DATE 08/02/2017

CHECK NO. 0000969291

\*\*\*\*\*\*\$500.00

Pay Five hundred and 00/100 Dollars

Pay to the Order of NEW MEXICO ENVIRONMENT DEPT 525 CAMINO DE LOS MARQUEZ STE 1 SANTA FE NM 87505

AUTHORIZED SIGNATURE

Void after 90 days

Memo

For Department use only:

### **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



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. For NOI applications, submit the entire UA1, UA2, and UA3 applications on a single CD (no copies are needed). For NOIs, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required.

 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  $\Box$  The full permit fee associated with 10 fee points (required w/ streamline applications).

■ Check No.: 969291 in the amount of \$500

■ I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page. □ This facility qualifies to receive assistance from the Small Business Environmental Assistance program (SBEAP) and qualifies for 50% of the normal application and permit fees. Enclosed is a check for 50% of the normal application fee which will be verified with the Small Business Certification Form for your company.

□ This facility qualifies to receive assistance from the Small Business Environmental Assistance Program (SBEAP) but does not qualify for 50% of the normal application and permit fees. To see if you qualify for SBEAP assistance and for the small business certification form go to https://www.env.nm.gov/aqb/sbap/small\_business\_criteria.html ).

**Citation:** Please provide the **low level citation** under which this application is being submitted: **20.2.72.200.A NMAC** (e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is 20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

## **Section 1 – Facility Information**

Sec	tion 1-A: Company Information	AI # if known (see 1st 3 to 5 #s of permitUpdating Permit/NOI #:				
1	Facility Name:	Plant primary SIC Code (4 digits): 5169				
1	Aventine Terminal	Plant NAIC code (6 digits): 42269				
a	Facility Street Address (If no facility street address, provide directions from US 285 and County Rd. 709, travel east on CR 709 (Brantley Rd.) at 729 (Kelly Rd.) and travel 0.44 miles to plant entrance on right.					
2	Plant Operator Company Name: Occidental Chemical Corporation	Phone/Fax: (972) 404-3427 / NA				
а	Plant Operator Address: 5005 LBJ Freeway, Dallas, TX 75244-6152					

b	Plant Operator's New Mexico Corporate ID or Tax ID: 16-0484732						
3	Plant Owner(s) name(s): Occidental Chemical Corporation	Phone/Fax: (972) 404-3427 / NA					
a	Plant Owner(s) Mailing Address(s): P.O. Box 809050, Dallas, TX 75380	-9050					
4	Bill To (Company): Occidental Chemical Corporation       Phone/Fax: (972) 404-3427 / NA						
a	Mailing Address: P.O. Box 809050, Dallas, TX 75380-9050       E-mail: Jack_Rice@oxy.com						
5	<ul> <li>Preparer: Barbara Alkis</li> <li>Consultant:</li> </ul>	Phone/Fax: (972) 404-3291 / NA					
a	Mailing Address: P.O. Box 809050, Dallas, TX 75380-9050	E-mail: barbara_alkis@oxy.com					
6	Plant Operator Contact: Jack Rice	Phone/Fax: (972) 404-3427 / NA					
а	Address: P.O. Box 809050, Dallas, TX 75380-9050	E-mail: Jack_Rice@oxy.com					
7	Air Permit Contact: Barbara Alkis	Title: Manager Air Programs					
a	E-mail: Barbara_Alkis@oxy.com	Phone/Fax: (972) 404-3291 / NA					
b	Mailing Address: P.O. Box 809050, Dallas, TX 75380-9050						

### Section 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?	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? □ Yes □ No							
3	Is the facility currently shut down? □ Yes ■ No	If yes, give month and year of shut down (MM/YY):							
4	Was this facility constructed before 8/31/1972 and continuously operated s	since 1972? □ Yes ■ No							
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since $\frac{8}{31}/1972?$								
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? □ Yes ■ No	If yes, the permit No. is: P-							
7	Has this facility been issued a No Permit Required (NPR)? □ Yes ■ No	If yes, the NPR No. is:							
8	Has this facility been issued a Notice of Intent (NOI)? □ Yes ■ No	If yes, the NOI No. is:							
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? □ Yes ■ No	If yes, the permit No. is:							
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? □ Yes ■ No	If yes, the register No. is:							

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

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)									
a	Current	Annually:								
b	Proposed	Hourly: 18,000 gallons	Daily: 432,000 gallons	Annually: 20 MMgal 36 wt% HCl						
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)									
a	Current	Hourly:	Daily:	Annually:						
b	Proposed     Hourly: 18,000 gallons     Daily: 432,000 gallons     Annually: 20 MMgal 36 wt		Annually: 20 MMgal 36 wt% HCl							

### Section 1-D: Facility Location Information

1	Section: 7	Range: 28E	Township: 23S	County: Eddy		Elevation (ft): 3,040						
2	UTM Zone: [	□12 or ■13		Datum: 🗆 NAD 27	□ NAD 8	33 ■ WGS 84						
а	UTM E (in mete	rs, to nearest 10 meter	s): 582,930	UTM N (in meters, to nearest	10 meters):	3,576,280						
b	AND Latitude	(deg., min., sec.):	32° 19' 13"	Longitude (deg., min., sec	c.): -104° (	07' 08"						
3	Name and zip	code of nearest Ne	ew Mexico town: Loving 8	8256								
4	right on CR 70	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From Loving, head north on US 285 to right on CR 709. Travel east on CR 709 (Brantley Rd.) approximately 1.24 miles to CR 729. Right on CR 729 (Kelly Rd.) and travel 0.44 miles to plant entrance on right.										
5	The facility is 2	The facility is 2.2 miles NW of Loving.										
6	Status of land a	at facility (check o	one):  Private  Indian/Pu	ueblo 🗆 Federal BLM 🗆 Fe	ederal For	est Service						
7		· ·		a ten (10) mile radius (20 berated: Loving, Carlsbad, a		.B.2 NMAC) of the property County						
8	closer than 50 www.env.nm.gov/	km (31 miles) to aqb/modeling/class1ar	o other states, Bernalillo (	County, or a Class I area (se 0.2.72.206.A.7 NMAC) If	ee	constructed or operated be ll with corresponding						
9	Name nearest (	Class I area: Carls	bad Caverns National Park									
10	Shortest distan	ce (in km) from fa	acility boundary to the boundary	ndary of the nearest Class I	area (to the	nearest 10 meters): 27.70						
11				ions (AO is defined as the p est residence, school or occu								
12	lands, including mining overburden removal areas) to nearest residence, school or occupied structure: 60 m         Method(s) used to delineate the Restricted Area: Fencing and gates         "Restricted Area" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.											
13	<ul> <li>Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC?</li> <li>□ Yes ■ No</li> <li>A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.</li> </ul>											
14			unction with other air regul nit number (if known) of th	ated parties on the same pro ne other facility?	operty?	🛛 No 🗌 Yes						

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

1	Facility <b>maximum</b> operating $\left(\frac{\text{hours}}{\text{day}}\right)$ : 24	$\left(\frac{\text{days}}{\text{week}}\right)$ : 7	$\left(\frac{\text{weeks}}{\text{year}}\right): 52$	$\left(\frac{\text{hours}}{\text{year}}\right)$ : 8760				
2	Pacility's maximum daily operating schedule (if less than $24 \frac{\text{hours}}{\text{day}}$ )? Start: $\square AM \\ \square PM $ End:							
3	Month and year of anticipated start of construction: October 2017							
4	Month and year of anticipated construction complet	ion: June 2018						
5	Month and year of anticipated startup of new or modified facility: June 2018							
6	Will this facility operate at this site for more than or	ne year? ■ Yes □ No						

### Section 1-F: Other Facility Information

 1
 Are there any current Notice of Violations (NOV), compliance orders, or any other compliance or enforcement issues related to this facility? □ Yes ■ No If yes, specify:

а	If yes, NOV date or description of issue:		NOV Tracking No:						
b	b Is this application in response to any issue listed in 1-F, 1 or 1a above? □ Yes ■ No If Yes, provide the 1c & 1d info below:								
с	Document Title:	Date:		nent # (or nd paragraph #):					
d	Provide the required text to be inserted in this permit:								
2	Is air quality dispersion modeling or modeling waiver being	g submitted with this	applicatio	n? □Yes ∎No					
3	Does this facility require an "Air Toxics" permit under 20.2	2.72.400 NMAC & 20	).2.72.502	, Tables A and/or B? □ Yes ■ No					
4	Will this facility be a source of federal Hazardous Air Pollu	utants (HAP)? ■ Yes	□ No						
а	If Yes, what type of source? $\Box$ Major ( $\Box \ge 10$ tpy of anOR $\blacksquare$ Minor ( $\Box < 10$ tpy of any			tpy of any combination of HAPS) 5 tpy of any combination of HAPS)					
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? □ Yes ■ No								
	If yes, include the name of company providing commercial electric power to the facility:								
a	Commercial power is purchased from a commercial utility site for the sole purpose of the user.	company, which spe	cifically d	loes not include power generated on					

### Section 1-G: Streamline Application (This section applies to 20.2.72.300 NMAC Streamline applications only)

1 □ I have filled out Section 18, "Addendum for Streamline Applications." ■ N/A (This is not a Streamline application.)

### Section 1-H: Current Title V Information - Required for all applications from TV Sources

(Title V-source required information for all applications submitted pursuant to 20.2.72 NMAC (Minor Construction Permits), or

20.2.74/20.2.79 NMAC (Major PSD/NNSR applications), and/or 20.2.70 NMAC (Title V))

1	Responsible Official (R.O.) (20.2.70.300.D.2 NMAC):	Phone:			
a	R.O. Title:	R.O. e-mail:			
b	R. O. Address:				
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC):		Phone:		
a	A. R.O. Title:	A. R.O. e-mail:			
b	A. R. O. Address:				
3	Company's Corporate or Partnership Relationship to any other Air have operating (20.2.70 NMAC) permits and with whom the applic relationship):				
4	Name of Parent Company ("Parent Company" means the primary r permitted wholly or in part.):	ame of the organiza	tion that owns the company to be		
а	Address of Parent Company:				
5	Names of Subsidiary Companies ("Subsidiary Companies" means owned, wholly or in part, by the company to be permitted.):	organizations, branc	hes, divisions or subsidiaries, which are		
6	Telephone numbers & names of the owners' agents and site contact	ts familiar with plan	t operations:		
7	Affected Programs to include Other States, local air pollution contr Will the property on which the facility is proposed to be constructe states, local pollution control programs, and Indian tribes and pueb ones and provide the distances in kilometers:	d or operated be clo	ser than 80 km (50 miles) from other		

### 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:

- 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 copy does not need to be 2-hole punched, but must be double sided. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.
- 3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically on compact disk(s) (CD). For 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.
- 4) If air dispersion modeling is required by the application type, include the NMED Modeling Waiver OR one additional electronic copy of the air dispersion modeling including the input and output files. The dispersion modeling <u>summary report</u> <u>only</u> should be submitted as hard copy(ies) unless otherwise indicated by the Bureau. The complete dispersion modeling study, including all input/output files, should be submitted electronically as part of the electronic submittal.
- 5) If 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.

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

- 1) All required electronic documents shall be submitted in duplicate (2 separate CDs). 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 with the number of additional hard copies corresponding to the number of CD copies required. 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 3 electronic files (2 MSWord docs: Universal Application section 1 and Universal Application section 3-19) and 1 Excel file of the tables (Universal Application section 2) on the CD(s). 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 # (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. The footer information should not be modified by the applicant.

### **Table of Contents**

- Section 1: General Facility Information
- Section 2: Tables
- Section 3: Application Summary
- Section 4: Process Flow Sheet
- Section 5: Plot Plan Drawn to Scale
- Section 6: All Calculations
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- Section 8: Map(s)
- Section 9: Proof of Public Notice
- Section 10: Written Description of the Routine Operations of the Facility
- Section 11: Source Determination
- Section 12: PSD Applicability Determination for All Sources & Special Requirements for a PSD Application
- Section 13: Discussion Demonstrating Compliance with Each Applicable State & Federal Regulation
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- Section 15: Alternative Operating Scenarios
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- Section 17: Compliance Test History
- Section 18: Addendum for Streamline Applications (streamline applications only)
- Section 19: Requirements for the Title V (20.2.70 NMAC) Program (Title V applications only)
- Section 20: Other Relevant Information
- Section 21: Addendum for Landfill Applications
- Section 22: Certification Page

### 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	Source Description	Make	Model #	Serial #	Manufact- urer's Rated Capacity <sup>3</sup>	Requested Permitted Capacity <sup>3</sup>	Date of Manufacture <sup>2</sup>	Controlled by Unit #	Source Classi- fication	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI,	Replacing
Number <sup>1</sup>					(Specify Units)	(Specify Units)	Date of Construction/ Reconstruction <sup>2</sup>	Emissions vented to Stack #	Code (SCC)		4SLB, 4SRB, 2SLB) <sup>4</sup>	Unit No.
TANKS	Acid Tanks	NI/A	NI/A	N/A	54.000 Cal	54,000 Gal	2017	SCRUBBER	25209-	<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</li> </ul>		
IANKS	Acid Tanks	N/A	N/A	IN/A	54,000 Gal	54,000 Gai	2017	SCRUBBER	95020	□ To Be Modified □ To be Replaced		
LOAD	Track			NT/A		NT/A	2017	SCRUBBER	25250-	□ Existing (unchanged) □ To be Removed		
LOAD	Truck Loading	N/A	N/A	N/A	N/A	N/A	2017	SCRUBBER	30020	<ul> <li>New/Additional</li> <li>Replacement Unit</li> <li>To Be Modified</li> <li>To be Replaced</li> </ul>		
							2017		25250-	□ Existing (unchanged) □ To be Removed	1	
FUG	Piping Fugitives	N/A	N/A	N/A	N/A	N/A	2017		40020	<ul> <li>New/Additional</li> <li>Replacement Unit</li> <li>To Be Modified</li> <li>To be Replaced</li> </ul>		
					1		2017	SCRUBBER	25250-	□ Existing (unchanged) □ To be Removed		
DEGAS	Truck Degassing	N/A	N/A	N/A	N/A	N/A	2017	SCRUBBER	00020	<ul> <li>New/Additional</li> <li>Replacement Unit</li> <li>To Be Modified</li> <li>To be Replaced</li> </ul>		
	Startup, shutdown,						2017		25250-	□ Existing (unchanged) □ To be Removed		
SSM/M	maitenance, malfunction	N/A	N/A	N/A	N/A	N/A	2017		40020	■ New/Additional □ Replacement Unit □ To Be Modified □ To be Replaced		
							2017			□     To Be Modified     □     To be Replaced       □     Existing (unchanged)     □     To be Removed		
									ł	New/Additional     Replacement Unit		
										<ul> <li>To Be Modified</li> <li>To be Replaced</li> <li>Existing (unchanged)</li> <li>To be Removed</li> </ul>		
									•	New/Additional     Replacement Unit		
										□ To Be Modified □ To be Replaced		
									ļ	<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</li> </ul>		
										□ To Be Modified □ To be Replaced		
										<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</li> </ul>		
									T	□ To Be Modified □ To be Replaced		
					1					Existing (unchanged) To be Removed		
									İ	<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		
									ł	<ul> <li>New/Additional</li> <li>Replacement Unit</li> <li>To Be Modified</li> <li>To be Replaced</li> </ul>		
										<ul> <li>To Be Modified</li> <li>To be Replaced</li> <li>Existing (unchanged)</li> <li>To be Removed</li> </ul>		
									ł	New/Additional     Replacement Unit		
										□     To Be Modified     □     To be Replaced       □     Existing (unchanged)     □     To be Removed		
									ļ	<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</li> </ul>		
										□ To Be Modified □ To be Replaced		
										<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</li> </ul>		
									Ĭ	□ To Be Modified □ To be Replaced		

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

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

<sup>4</sup> "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)ORExempted 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) Insignificant Activity citation (e.g. IA List	Date of Manufacture /Reconstruction <sup>2</sup> Date of Installation	For Each Piece of Equipment, Check Onc
			Serial No.	Capacity Units	Item #1.a)	/Construction <sup>2</sup>	
Painting	Surface coating of equipment	n/a	n/a	n/a	20.2.72.202.B.6	n/a	Existing (unchanged)       To be Removed         New/Additional       Replacement Unit         To Be Modified       To be Replaced
Maintenance	Portable/temporary equipment for maintenance	n/a	n/a	n/a	20.2.72.202.B.5	n/a	To Be Modified       To be Replaced         Existing (unchanged)       To be Removed         New/Additional       Replacement Unit         To Be Modified       To be Replaced
							If the Bernoullicat       If the 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
							<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</li> <li>To Be Modified</li> <li>To be Replaced</li> </ul>
							<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</li> <li>To Be Modified</li> <li>To be Replaced</li> </ul>
							<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</li> <li>To Be Modified</li> <li>To be Replaced</li> </ul>
							<ul> <li>Existing (unchanged)</li> <li>To be Removed</li> <li>New/Additional</li> <li>Replacement Unit</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>1</sup> Insignificant activities exempted due to size or production rate are defined in 20.2.70.300.D.6, 20.2.70.7.Q NMAC, and the NMED/AQB List of Insignificant Activities, dated September 15, 2008. Emissions from these insignificant activities do not need to be reported, unless specifically requested.

<sup>2</sup> Sanaify data(a) an aviand to datamain a movilat

<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.	<b>Control Equipment Description</b>	Date Installed	Controlled Pollutant(s)	Controlling Emissions for Unit Number(s) <sup>1</sup>	Efficiency (% Control by Weight)	Method used to Estimate Efficiency
SCRUBBER	Packed Bed Water Scrubber	2017	HCl	TANKS, LOAD, SSM	95%	Eng. Estimate
<sup>1</sup> List each control of	device on a separate line. For each control device, list all e	mission units of	controlled by the control device.			

### 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.	N	Ox	C	0	V	DC	S	Ox	TS	$SP^2$	PM	(10 <sup>2</sup>	PM	$2.5^2$	Н	$_{2}S$		ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr										
Totals																		

<sup>1</sup>Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for TSP unless TSP is set equal to PM10 and PM2.5.

### Table 2-E: Requested Allowable Emissions

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

Unit No.	N	Ox	C	20	V	DC	S	Ox	TS	SP <sup>1</sup>	PM	(10 <sup>1</sup>	PM	2.5 <sup>1</sup>	Н	$_2S$	Le	ead
Unit No.	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr								
TANKS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LOAD	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
FUG	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DEGAS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

\* Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for TSP unless TSP is set equal to PM11 and PM2.5.

#### 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/agb/permit/agb\_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).

(Inteps.//www.		Ox		0	V(			Dx	TS	SP <sup>2</sup>	PM	110 <sup>2</sup>	PM	$2.5^2$	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								
SSM/M	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
																		1
Totals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

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

<sup>1</sup>Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for TSP unless TSP is set equal to PM10 and PM2.5.

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

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

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

	Serving Unit		Ox	C	0	V	DC	S	Ox	T	SP	PN	110	PM	12.5	$\Box$ H <sub>2</sub> S o	r 🗆 Lead
Stack No.	Number(s) from Table 2-A	lb/hr	ton/yr	lb/hr	ton/yr												
SCRUBBER	TANKS, LOAD, SSM	0	0	0	0	0	0	0	0	0	0	0	0.0	0.0	0	0	0
r	Totals:																

### Table 2-H: Stack Exit Conditions

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

Stack	Serving Unit Number(s)	Orientation (H-Horizontal	Rain Caps	Height Above	Temp.	Flow	v Rate	Moisture by	Velocity	Inside
Number	from Table 2-A	(H-Horizontal V=Vertical)	(Yes or No)	Ground (ft)	(F)	(acfs)	(dscfs)	Volume (%)	(ft/sec)	Diameter (ft)
SCRUBBER	TANKS, LOAD, DEGAS	V	NO	unknown	ambient	2.0	-	-	-	unknown

### 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		H	CI	Provide l Name	Pollutant Here	Provide Name	Here	Name	Pollutant Here or 🗆 TAP	Provide Name	Here	Name	Pollutant Here or 🗆 TAP	Name	Pollutant e Here or 🗆 TAP	Name Her	Pollutant e 🛛 r 🗆 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
SCRUBBER	TANKS	2.91	0.19	2.91	0.19														
SCRUBBER	LOAD	3.44	0.85	3.44	0.85														
	FUG	0.32	1.41	0.32	1.41														
SCRUBBER	DEGAS	0.47	1.05	0.47	1.05														
	SSM/M	68.80	2.00	68.80	2.00														
-												_							
Tot	als:	75.94	5.50	75.94	5.50														

### Table 2-J: Fuel

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

	Fuel Type (low sulfur Diesel, ultra low sulfur diesel,	Fuel Source: purchased commercial, pipeline quality natural gas, residue		Speci	fy Units	-	-
Unit No.	ultra low sulfur diesel, Natural Gas, Coal,)	gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
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.

		11 1 8			Vapor	Average Stor	age Conditions	Max Storag	ge Conditions
Tank No.	SCC Code	Material Name	Composition	Liquid Density (lb/gal)	Molecular Weight (lb/lb*mol)	Temperature (°F)	True Vapor Pressure (psia)	Temperature (°F)	True Vapor Pressure (psia)
TANKS	See 2A	Muriatic Acid	Max: 36 wt% HCl in water	9.96	36.46	65	1.4	90	3.2

### Table 2-L: Tank Data

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

Tank No.	Date Installed	Materials Stored	Seal Type (refer to Table 2 LR below)	Roof Type (refer to Table 2- LR below)	Сар	acity	Diameter (M)	Vapor Space	Co (from Ta	blor ble VI-C)	Paint Condition (from Table	Annual Throughput (gal/yr)	Turn- overs
			LK below)	LK below)	(bbl)	(M <sup>3</sup> )		(M <sup>3</sup> )	Roof	Shell	VI-C)	(gal/yr)	(per year)
TANKS	2017	Muriatic Acid	N/A	FX	1,280	13,004	4.7	107.2	WH	WH	Good	20,000,000	-
													<u> </u>
													<u> </u>
													<u> </u>

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: $1.00 \text{ bbl} = 0.159 \text{ N}$	$1^3 = 42.0 \text{ gal}$				BL: Black	
					OT: Other (specify)	

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

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

	Materi	al Processed		N	Iaterial Produced		
Description	Chemical Composition	Phase (Gas, Liquid, or Solid)	Quantity (specify units)	Description	Chemical Composition	Phase	Quantity (specify units)
Muriatic Acid	Max 36 wt% HCl in water	Liquid	20,000,000 gallons/yr				

### 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
None									

### 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
None								

#### 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	N2O ton/yr	CH <sub>4</sub> ton/yr	SF <sub>6</sub> ton/yr	PFC/HFC ton/yr <sup>2</sup>					<b>Total</b> <b>GHG</b> Mass Basis ton/yr <sup>4</sup>	<b>Total</b> <b>CO<sub>2</sub>e</b> ton/yr <sup>5</sup>
Unit No.	GWPs <sup>1</sup>	1	298	25	22,800	footnote 3						
TANKS	mass GHG CO <sub>2</sub> e										0	0
LOAD	mass GHG CO <sub>2</sub> e										0	0
FUG	mass GHG CO <sub>2</sub> e										0	0
DEGAS	mass GHG CO <sub>2</sub> e							 	 	 	0	0
SSM/M	mass GHG CO <sub>2</sub> e										0	0
	mass GHG CO <sub>2</sub> e											0
	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 mass GHG											
	CO <sub>2</sub> e mass GHG											
	CO <sub>2</sub> e mass GHG											
	CO <sub>2</sub> e mass GHG											
	CO2e mass GHG										0	0
Total	CO <sub>2</sub> e										0	0

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

<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>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>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.

## **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).

**Routine or predictable emissions during Startup, Shutdown, and Maintenance (SSM):** 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.

Occidental Chemical Corporation is requesting an air permit under 20.2.72.200.A NMAC to construct and operate the Aventine Terminal near Loving, New Mexico. Construction will occur in two phases. Phase one construction will commence within two years of permit issuance, and phase two construction will begin within one year of phase one startup as required by 20 2.72.211.B NMAC.

The terminal will have a railcar unloading rack, three muriatic acid storage tanks, one water storage tank, a water scrubber, and a truck loading rack. Railcars containing muriatic acid will enter the facility and unload to one of three storage tanks. Muriatic acid will then be loaded into trucks at full strength or diluted with water for a reduced concentration. The three muriatic acid tanks and truck loading will vent to a scrubber to control emissions. Trucks entering the facility will need to be depressurized before loading. Truck degassing emissions will also vent to the scrubber.

Startup, shutdown, maintenance, and malfunction (SSM/M) emissions are also included for times when the scrubber or piping may require maintenance or shutdown. Emissions associated with additional maintenance activities will meet exemption requirements under 20.2.72.202.B NMAC and are included on Table 2B of the application.

### **Process Flow Sheet**

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



## **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.



## **All Calculations**

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

### POTENTIAL TO EMIT SUMMARY

### **AVENTINE TERMINAL**

### **OCCIDENTAL CHEMICAL CORPORATION**

_			HCI Em	nissions		
		Uncontroll			trolled <sup>a</sup>	
Unit ID	Description	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	
TANKS	Three Acid Storage Tanks	58.18	3.77	2.91	0.19	
LOAD	Truck Loading	68.80	16.99	3.44	0.85	
FUG	Piping Component Fugitive	0.32	1.41	0.32	1.41	
DEGAS	Truck Degassing	9.38	21.10	0.47	1.05	
SSM/M	Startup, shutdown, maintenance, and malfunction	68.80	2.00	68.80	2.00	
	Site-Wide Emissions:	205.48	45.26	75.94	5.50	

a. Emissions associated with TANKS, LOAD, and DEGAS will vent to a water scrubber with a 95% control efficiency.

#### TANK WORKING AND BREATHING UNCONTROLLED EMISSIONS

#### AVENTINE TERMINAL OCCIDENTAL CHEMICAL CORPORATION

Variable	Description	Units	Value
-	Roof Construction	-	Dome
ΔPb	Breather vent pressure range	psi	0.36
I	Solar insolation factor <sup>a</sup>	Btu/ft2-day	1810
P <sub>A</sub>	Atmospheric Pressure	psia	13.2
Т	Annual Average Temperature	۴F	61.4
T <sub>AX</sub>	Daily Maximum Ambient Temperature <sup>a</sup>	°R	535.3
T <sub>AN</sub>	Daily Minimum Ambient Temperature <sup>a</sup>	°R	507.5
$\Delta T_A$	Daily average ambient temperature range	°R	27.8
Кр	Product factor		1
	Total Number of Tanks		3
	AD Table 7.1.7 fan Danwall NNA		

Sa	ample C	Calcula	ations	

- L<sub>s</sub> = Standing loss (lb/yr) = 365 Vv Wv Ke Ks
- $L_w$  = Working loss (lb/yr) = 0.001 Mv Pv Q Kn Kp
- $L_{H}$  = Hourly working loss (lb/hr) = 0.001 Mv P<sub>MAX</sub> Q<sub>H</sub>

a. Data from AP-42 Table 7.1-7 for Roswell NM.

#### **Tank and Material Specifications**

		VFR/HFR	D	H/L	CAPACITY	COLOR	α	Mv	P <sub>MAX</sub>	Pv	Q <sub>H</sub>	Q	T <sub>LA</sub>
		Tank Type	Tank Dia.	Tank Height/	Tank Capacity	Tank Color	Paint Solar	Vapor	Max Vapor	Average	Maximum	Annual	Daily
				Length			Absorbance	Molecular	Pressure	True Vapor	Hourly	Throughput	Average
Unit ID	Material						Factor	Weight	(@ 90°F)	Pressure	Throughput		Liquid
													Surface
													Temp.
			(ft)	(ft)	(bbl)			(lb/lbmol)	(psia)	(psia)	(bbl/hr)	(bbl/yr)	(°R)
TANKS	Muriatic Acid	VFR	15.5	38	1,280	White	0.17	36.46	3.2	1.4	500	480,000	523.8

#### Tank Emission Calculations

		ΔP <sub>v</sub>	H <sub>RO</sub>	H <sub>vo</sub>	V <sub>v</sub>	Wv	ΔT <sub>v</sub>	K <sub>E</sub>	Ks	Ls	K <sub>n</sub>	Lw	L <sub>H</sub>
		Daily							Vented				Total
Unit	No-to-stal	Vapor					Daily Vapor	Vapor	Vapor	Standing	Annual	Total	Hourly
Unit ID	Material	Pressure	Tank Roof	Vapor Space	Vapor Space	Vapor	Temperature	Expansion	Saturation	Loss per	Turnover	Working	Working
		Range	Outage	Outage	Volume	Density	Range	Factor	Factor	Tank	Factor	Loss	Loss
		(psia)	(ft)	(ft)	(ft <sup>3</sup> )	(lb/ft <sup>3</sup> )	(°R)			(lb/yr)		(lb/yr)	(lb/hr)
TANKS	Muriatic Acid	1.05	1.06	20.06	3,785	0.0088	28.6	0.113	0.410	562.47	0.25	5,844.81	58.18

Total Annual Emissions: [(562.47 lb/yr/tank) \* (3 tanks) + (5844.81 lb/yr)] / 2,000 lb/ton = 3.77 tpy

NOTE: Tank working and breathing emissions calculations are based on the equations found in AP-42 Chapter 7.

### TRUCK LOADING UNCONTROLLED EMISSIONS

### AVENTINE TERMINAL OCCIDENTAL CHEMICAL CORPORATION

Loading Loss (lb/Mgal) = 12.46 \* S \* P \* M / T (AP-42 Section 5.2)

S = Saturation factor (Table 5.2-1)

P = Vapor Pressure, psia

M = Molecular weight, lb/lbmol

T = Bulk liquid temperature, °R

		P @ 65°F	P <sub>MAX</sub> @ 90°F		Maximum Loading Loss			ighput <sup>b</sup>	Uncontro Emise	sions
Unit ID	Sª	(psia)	(psia)	Μ	(lb/Mgal)	(lb/Mgal)	(Mgal/hr)	(Mgals/yr)	(lb/hr)	(T/yr)
LOAD	1.45	1.4	3.2	36.46	3.82	1.70	18.0	20,000	68.80	16.99

a S factor from AP-42 Table 5.2-1 for splash loading in dedicated service trucks.

b Represented throughput is for 36 wt% muriatic acid. Acid may be diluted with water which will result in a higher annual throughput, but emissions for HCl will not increase.

### PIPING COMPONENT FUGITIVE EMISSIONS

### AVENTINE TERMINAL OCCIDENTAL CHEMICAL CORPORATION

	Number of	Emission	Factors <sup>a</sup>	Annual Operating Hours	HCI	Reduction Credit <sup>a</sup>	HCl Em	issions
Component	Components	kg/hr/component	(lb/hr/component)	(hr/yr)	(wt%)	(%)	(lb/hr)	(T/yr)
Valves	40	0.00403	0.0089	8760	36%	0	0.128	0.560
Pumps	11	0.0199	0.0439	8760	36%	0	0.174	0.761
Connections	102	0.00183	0.0040	8760	36%	0	0.148	0.649
						TOTAL:	0.32	1.41

a. Fugitive Emission Factors from EPA Document, EPA-453/R-95-017, November 1995, Page 2-12.

#### TRUCK DEGASSING UNCONTROLLED EMISSIONS

### AVENTINE TERMINAL OCCIDENTAL CHEMICAL CORPORATION

Tanks are pressure unloaded using an on-board compressor so when they return for filling they must first be depressurized. Since air is used to pressurize the tank, the maximum amount of HCl emitted during depressuring would be saturation of the tank vapor space. Calculations also conservatively assume that all tank vapor is vented during degassing, which is not the case since trucks will be depressurized to ambient pressure. Truck loading emissions are based on using dedicated service trucks, so a portion of the degassing emissions are also accounted for in loading.

HCl Partial Pressure:	1.4 psia	
HCI Molecular Wt:	36.46 lb/lbmol	
Truck Volume:	8,000 gallons =	1070 ft <sup>3</sup>
Average Temp:	65 °F =	525 °R
Number of Trucks:	4,500 Trucks/yr	

HCl Emissions (lb/truck) =  $P*V*Mw/(R*T) = [(1.4 \text{ psia}) * (1070 \text{ ft}^3/\text{truck}) * (36.46 \text{ lb/lbmol})] / [(10.73 \text{ psia-ft}^3/\text{lbmol-}^\circ R) * (525 \circ R)] = 9.38 \text{ lb/truck}$ 

Annual HCl Emissions (Uncontrolled) = (9.38 lb/truck) \* (4,500 trucks/yr) / (2,000 lb/ton) = 21.10 tons/yr

# 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 <u>Mandatory Greenhouse Gas Reporting</u>.

3. Emissions from routine or predictable start up, shut down, and maintenance must be included.

**4.** Report GHG mass and GHG  $CO_2e$  emissions in Table 2-P of this application. Emissions are reported in <u>short</u> tons per year and represent each emission unit's Potential to Emit (PTE).

**5.** All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO2e emissions for each unit in Table 2-P.

**6.** For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following  $\Box$  By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

### Sources for Calculating GHG Emissions:

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

• Sources listed on EPA's NSR Resources for Estimating GHG Emissions at http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases:

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

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of  $CO_2$  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 <u>Mandatory Greenhouse Reporting</u> requires metric tons. 1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

### HCl is not a GHG, so this application does not include any GHG emissions.

## **Information Used To Determine Emissions**

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

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

Fugitive emission factors from EPA document EPA-453/R-95-017, Table 2-1 are included in this section. All other emission calculations are based on methodologies found in current versions of AP-42 Section 7.1 for tanks dated November 2011 and Section 5.2 for truck loading dated June 2008.
Equipment type	Service	Emission factor <sup>a</sup> (kg/hr/source)
Valves	Gas Light liquid Heavy liquid	0.00597 0.00403 0.00023
Pump seals <sup>b</sup>	Light liquid Heavy liquid	0.0199 0.00862
Compressor seals	Gas	0.228
Pressure relief valves	Gas	0.104
Connectors	All	0.00183
Open-ended lines	All	0.0017
Sampling connections	All	0.0150

#### TABLE 2-1. SOCMI AVERAGE EMISSION FACTORS

<sup>a</sup>These factors are for total organic compound emission rates.

<sup>b</sup>The light liquid pump seal factor can be used to estimate the leak rate from agitator seals.

# 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	



# Section 9

### **Proof of Public Notice**

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

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

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

#### New Permit and Significant Permit Revision public notices must include all items in this list.

**Technical Revision** public notices require only items 1, 5, 9, and 10.

Per the Guidelines for Public Notification document mentioned above, include:

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

A property tax record in Item 3 above is not available since this is a newly purchased property. A copy of the tax record from the Eddy County website is included with this section showing the property has no tax value for 2017.

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USPS TRACKING & CUSTOMER BECEIDT				
USPS TRACKING # & CUSTOMER RECEIPT		-0056	LOVING, NM 88256-0056	P.O. Box 56 LOVING, NM 88256-0056
USPS TRACKING & & CUSTOMER RECEIPT	1	Carlsbad, NM 88220	1	Carlsbad, NM 88220
USPS TRACKING & CUSTOMER RECEIPT	220	CARLSBAD, NM 88220	25 WALKER RD CARLSBAD, NM 88220	
USPS TRACKING #		CARLSBAD NM 88770		CARLSHAD NM 88220
& CUSTOMER RECEIPT			02200 IMM , UMU CUMAN	
USPS TRACKING #	M 87110	ALBUQUERQUE, NM 87110	1713 HENDOLA DR NE ALBUQUERQUE, NM 87110	
USPS TRACKING A & CUSTOMER RECEIPT		CARLSBAD, NM 88220		CARLSBAD, NM 88220
USPS TRACKING & CUSTOMER RECEIPT	220-9452	CARLSBAD, NM 88220-9452	5452 QUEENS HWY CARLSBAD, NM 88220-9452	
LUSPS TRACKING # & CUSTOMER RECEIPT	220-8943	CARLSBAD, NM 88220-8943	81 KELLY ROAD CARLSBAD, NM 88220-8943	
USPS TRACKING # L CUSTOMER RECEIPT	15258	SCOTTSDALE, AZ 85258		SCOTTSDALE,
USPS TRACKING # & CUSTOMER RECEIPT	220	CARLSBAD, NM 88220	2393 PECOS HWY CARLSBAD, NM 88220	
USPS TRACKING CUSTOMER RECEIPT		DALLAS, TX 75204		E DALLAS,
USPS TRACKING # & CUSTOMER RECEIPT	6102	FORT WORTH, TX 76102	420 THROCKMORTON STE 550 FORT WORTH, TX 76102	z

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8/ /	1/2/14	8/1/2	1/2/2	8/5/17	2/2/2	4/1/5/	8/5/17	8/5/17
9114 9014 9645 0265 9291 47	For Tracking or Inquiries go to USPS.com or call 1-800-222-1811.	9114 9014 9645 0265 9291 54 For Tracking or inquiries po to USPS.com or call 1-800-222-1811.	9114 9014 9645 0265 9291 61 For Tracking of Inquities go to USPS com or call 1-800-222-1811.	9114 9014 9645 0265 9291 78 For Tracking or Inquiries go to USPS.com or call 1-800-222-1811.	9114 9014 9645 0265 9291 85 For Tracking or Inquities go to USPS.com or call 1-800-222-1811.	9114 9014 9645 0265 9291 92 For Tracking or matrices go to USPS com or call 1-800-222-1811.	9114 9014 9645 0265 9292 08 For Tracking or inquities go to USPS.com or call 1-800-222-1811.	9114 9014 9645 0265 9292 15 For Tracking or inquiries go to USPS.com or calt 1-800-222-1811.
	& CUSTOMER RECEIPT	USPS TRACKING # & CUSTOMER RECEIPT	USPS TRACKING # & CUSTOMER RECEIPT	LUSPS TRACKING # 8 CUSTOMER RECEIPT	USPS TRACKING # & CUSTOMER RECEIPT	USPS TRACKING # & CUSTOMER RECEIPT	USPS TRACKING # å CUSTOMER RECEIPT	USPS TRACKING # & CUSTOMER RECEIPT
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1304 W RIVERSIDE DRIVE		706 W RIVERSIDE DR	84 KELLY ROAD	PO BOX 597	150 KELLY RD	PO BOX 72	1588 SANDINISTA DRIVE	108 KELLY ROAD
BRANTLEY, JOHN DRAPER JR	& BRANTLEY, GEORGE HENRY	BRANTLEY, JOHN DRAPER & GEORGE	CARRASCO, JOE	MCDONALD, HENRY	KIRKES, BILL H	RUSTLER HILLS II, LP	KARNOSKI, HELEN D	VILLA, MIQUELA C TRUST
4-163-133-336-452	4-163-134-397-499	4-164-134-167-465	4-164-133-065-396	4-164-134-070-331	4-164-134-072-229	4-164-134-076-528	4-164-134-122-433	4-164-134-202-333 4-164-134-206-069 4-164-134-233-197



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Email Updates	~	

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August 10, 2017, 11:11 am	Delivered, In/At Mailbox		CARLSBAD, NM 88220	
Your Item was delivered in or at the	mailbox at 11:11 am on August 10, 2017 in CARLSBAD, N	VM 88220.		
August 10, 2017, 7:01 am	Arrived at Post Office	Arrived at Post Office		
August 9, 2017, 7:52 pm	Departed USPS Regional Facility	Departed USPS Regional Facility		
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FAQs (http://faq.usps.com/?articleId=220900)

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	Track Another Package	+	
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		)	Delivered

Updated Delivery Day: Saturday, August 5, 2017 () Product & Tracking Information

**Postal Product:** 

Features: USPS Tracking®

DATE & TIME

STATUS OF ITEM

LOCATION

ALBUQUERQUE NM DISTRIBUTION CENTER

ALBUQUERQUE, NM 87110

ALBUQUERQUE, NM 87110

ALBUQUERQUE, NM 87101

ANNEX

FAQs > (http://faq.usps.com/?articleId=220900)

Remove X

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August 5, 2017, 11:32 am

Your Item was delivered in or at the malibox at 11:32 am on August 5, 2017 in ALBUQUERQUE, NM 87110.

August 5, 2017, 7:31 am

August 4, 2017, 5:26 pm

August 4, 2017, 4:59 pm

Arrived at USPS Regional Facility

Arrived at Post Office

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#### Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

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Go to our FAQs section to find answers to your tracking questions.

### USPS Tracking<sup>®</sup> Results



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Go to our FAQs section to find answers to your tracking questions.

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Updated Delivery Day: Saturday, Augu Product & Tracking Infor			See Available Actions
Postal Product:	Features: USPS Tracking <sup>®</sup>		
DATE & TIME	STATUS OF ITEM		LOCATION
August 5, 2017, 10:39 am	Delivered, in/At Malibox		CARLSBAD, NM 88220
Your item was delivered in or at the mailb	ox at 10:39 am on August 5, 2017 in CARLSBAD, NM 88	220.	
August 5, 2017, 6:22 am	Arrived at Post Office		CARLSBAD, NM 88220
August 4, 2017, 11:26 pm	Departed USPS Regional Facility		LUBBOCK TX DISTRIBUTION CENTER
August 4, 2017, 4:27 pm	Arrived at USPS Facility		LUBBOCK TX DISTRIBUTION CENTER
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#### Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

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Postal Product: Features USPS Tra					
DATE & TIME	STATUS OF ITEM		LOCATION		
August 5, 2017, 9:59 am	Delivered, PO Box		LOVING, NM 88256		
Your item has been delivered and is available at a PC	) Box at 9:59 am on August 5, 2017 in LOVIN	IG, NM 88256.			
August 5, 2017, 9:31 am	Arrived at Post Office		LOVING, NM 88256		
August 4, 2017, 11:26 pm	Departed USPS Regional Facility		LUBBOCK TX DISTRIBUTION CENTER	ą	
August 4, 2017, 4:27 pm	Arrived at USPS Facility		LUBBOCK TX DISTRIBUTION CENTER	1	

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#### Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

**USPS Tracking<sup>®</sup> Results** 

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Go to our FAQs section to find answers to your tracking questions.

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DATE & T	IME	STATUS OF ITEM			LOCATION
August 5, 2017, 8:45 am	Deli	vered, PO Box		ORLA, TX 79770	
Your item has been deliver	ed and is available at a PO Box at 8:	45 am on August 5, 2017 in ORL	A, TX 79770.		
August 5, 2017, 8:40 am	Avai	lable for Pickup		ORLA, TX 79770	
August 5, 2017, 8:28 am	Arriv	red at Post Office		ORLA, TX 79770	
August 5, 2017, 12:34 am	Dep	arted USPS Regional Facility		MIDLAND TX DIST	RIBUTION CENTER
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#### Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

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Postal Product:	Features: USPS Tracking®			
DATE & TIME	STATUS OF ITEM		LOCATION	
August 5, 2017, 12:15 pm	Delivered, In/At Mailbox		LAS VEGAS, NV 89123	
Your item was delivered in or at the m	ailbox at 12:15 pm on August 5, 2017 in LAS VEGAS, NV i	89123.		
August 5, 2017, 9:38 am	Out for Delivery		LAS VEGAS, NV 89123	
August 5, 2017, 9:28 am	Sorting Complete		LAS VEGAS, NV 89123	
August 5, 2017, 7:44 am	Arrived at Post Office		LAS VEGAS, NV 89123	
				See More 🗸

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#### Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.



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#### Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

#### **Public Notice Posting Locations**

#### Loving Village Hall

415 W. Cedar Loving, NM 88256 (575) 745-3511

#### **Loving Post Office**

402 W. Beech St. Loving, NM 88256 (575) 745-3611

#### **Carlsbad Public Library**

101 S. Halagueno St. Carlsbad, NM 88220 (575) 376-5512

#### **Facility Entrance**

		, Cottonwood, and Hackberry Assessment Histony Actual Value (2018) \$107,312 Primary Taxable \$35,771 Tax Area: 100 NR Mill Levy: 21834000 Type Actual Assessed Acres Agriculture \$107,312 \$35,771238.470 Land	📩 tvler
EDDY COUNT	Eddy County Website County Treasurer County Assessor County Clerk Logout Public	Account: R200420 Inli Levy does not include Special District Rates such as Penasco, Carlsbad Soil & Water, Central Valley, Eagle Draw, PVC, Cottorwood, and Hackberry Inli Levy does not include Special District Rates such as Penasco, Carlsbad Soil & Water, Central Valley, Eagle Draw, PVC, Cottorwood, and Hackberry Loantion Domer Information District Rates Status District Rates Rate District Rates Rate District Rates District Ra	Copyright (c) 2003 - 2012, Tyler Technologies, Inc. All Rights Reserved
	Account Search View Created Report(s) Help?	Account Information Account Summary Benarities Owner Information Count Detail Land	

August 02, 2017

Brantley, John Draper & George 706 W Riverside Drive Carlsbad, NM 88220

#### USPS TRACKING #: 9114-9014-9645-0265-9291-54

#### Dear Neighbor,

**Occidental Chemical Corporation** announces its application submittal to the New Mexico Environment Department for an air quality permit for the **construction** of its acid terminal facility. The expected date of application submittal to the Air Quality Bureau is **August 15, 2017.** 

The exact location for the proposed facility known as, <u>Aventine Terminal</u>, will be at latitude 32 deg, 19 min, 13 sec and longitude -104 deg, 07 min, 08 sec. The approximate location of this facility is **0.5** miles <u>northwest</u> of <u>the intersection of</u> <u>Hwy 285 and 31 in</u> Eddy county.

The proposed **construction** consists of <u>railcar unloading</u>, truck loading, storage tanks, fugitive piping components, and a <u>scrubber to control emissions</u>.

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

Pollutant:	Pounds per hour	Tons per year
Total sum of all Hazardous Air Pollutants (HAPs)	76 pph	5.5 tpy

The standard and maximum operating schedules of the facility will be continuous  $\underline{7}$  days a week and a maximum of  $\underline{52}$  weeks per year

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816; (505) 476-4300; 1 800 224-7009; https://www.env.nm.gov/aqb/permit/aqb\_draft\_permits.html. Other comments and questions may be submitted verbally.

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

#### Attención

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

Sincerely, Jack Rice, Manager Supply Chain Occidental Chemical Corporation P.O. Box 809050 Dallas, TX 75380-9050

#### Notice of Non-Discrimination

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

August 02, 2017

Eddy County Clerk Attn: Robin Van Natta 325 S. Main Street Carlsbad, NM 88220

#### USPS TRACKING #: 9114-9014-9645-0265-9290-31

#### Dear Ms. Van Natta,

**Occidental Chemical Corporation** announces its application submittal to the New Mexico Environment Department for an air quality permit for the **construction** of its acid terminal facility. The expected date of application submittal to the Air Quality Bureau is **August 15, 2017.** 

The exact location for the proposed facility known as, <u>Aventine Terminal</u>, will be at latitude 32 deg, 19 min, 13 sec and longitude -104 deg, 07 min, 08 sec. The approximate location of this facility is 0.5 miles <u>northwest</u> of <u>the intersection of Hwy 285 and 31 in Eddy</u> county.

The proposed **construction** consists of <u>railcar unloading</u>, truck loading, storage tanks, fugitive piping components, and a scrubber to control emissions.

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Total sum of all Hazardous Air Pollutants (HAPs)	76 pph	5.50 tpy

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

#### Attención

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

Sincerely, Jack Rice, Manager Supply Chain Occidental Chemical Corporation P.O. Box 809050 Dallas, TX 75380-9050

#### Notice of Non-Discrimination

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

## **General Posting of Notices - Certification**

I, Kristin Pope, the undersigned, certify that on August 3, 2017, posted a true and correct copy of the attached Public Notice in the following publicly accessible and conspicuous places in the Town of Loving and City of Carlsbad of Eddy County, State of New Mexico on the following dates:

1. Facility entrance August 3, 2017

2. Loving Village Hall, 415 W. Cedar, Loving August 2, 2017

3. Loving Post Office, 402 W. Beech St., Loving August 2, 2017

4. Carlsbad Public Library, 101 S. Halagueno St., Carlsbad August 1, 2017

Signed this 3rd day of August , 2017

Signature

August 3, 2017

Date

Printed Name

Consultants Title Agent for Occidental Chemical Corporation



## Submittal of Public Service Announcement - Certification

I, Barbara Alkis, the undersigned, certify that on July 31, 2017, submitted a public service announcement to Pecos Valley Broadcasting/KSVP Radio that serves the Town of Loving, Eddy County, New Mexico, in which the source is or is proposed to be located and that Pecos Valle Broadcasting RESPONDED THAT IT WOULD AIR THE ANNOUNCEMENT.

Signed this 8th day of Avgust, 2017, Barbera ali

<u>8 /8 / 17</u> Date

Barbara Alkis Printed Name

Manager – Air Programs at Occidental Chemical Corporation Title {APPLICANT OR RELATIONSHIP TO APPLICANT}

#### Alkis, Barbara L

From: Sent: To: Subject: Attachments: Alkis, Barbara L Monday, July 31, 2017 2:47 PM Gene Dow (gene.dow@pvbcradio.com) Public Service Announcement PVBC CC authorization\_Alkis.pdf

Gene,

As required by the New Mexico Environment Department, we must request a public service announcement about applying for an air quality permit. We would like the following announcement to air one time on KSVP on Friday August 4, 2017:

"Occidental Chemical Corporation is requesting an air permit to construct the Aventine Terminal near Loving, New Mexico. Notice is posted at the site located North of Hwy 31 on Kelly Rd, the Loving Post Office, Loving Village Hall, and Carlsbad Public Library. For any questions, please contact the New Mexico Environment Department at 505-476-4375."

I have attached the credit card authorization form for the \$30 payment for the airing. Please send the receipt to my email address.

Thank you, Barbara Alkis Occidental Chemical Corporation Office: (972) 404-3291 Mobile: (512) 773-5473

(pph) and tons per year (tpy) and could change slightly during the course of the De-

The standard maximum operating schedules of the facili-ty will be continuous days a week and a

per year.

The owner and/or op-erator of the Facility is: Jack Rice, Manager Supply Chain, Occi-dental Chemical Cor-poration, P.O. Box 809050, Dallas, TX 75380-9050

August 3, 2017 NOTICE OF AIR QUALITY PERMIT APPLICATION Corporation anounce submittal to the Nerwise submittal to the Nerwise ments to be made as or sex in the adminis-corporation anounce submittal to the Nerwise Mexico Environment perminal facility. The expected date of application submittal to the Air Quality Bureau to the Constantion of the to the Civil Rights and 31 in Eddy county. The estimated maxim-nerstic on of Hwy 285 and 31 in Eddy county. The estimated maxim-nersisons. The estimated maxim-nerguiated air contrain-terissions. The estimated maxim-nerguistic to contrain-terissions. The estimated maxim-mity will be as following the course of the Depin-to and the facility location. Bureau to the application. Bureau to the application on the a

view process is to learn how and 5 tpy 20.2.72.206 NMAC, where to file a com-This regulation can be plaint of discrimination. and found in the "Permits" section of this web site.

#### Affidavit of Publication

State of New Mexico. County of Eddy, ss.

Danny Fletcher, being first duly sworn, on oath says:

That he is the Publisher of the Carlsbad Current-Argus, ล newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county: that the same is a duly qualified newspaper under the laws of the State wherein legal notices advertisements may and be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

#### August 3

That the cost of publication is \$236.21 and that payment thereof has been made and will be assessed as court cost

Subscribed and sworn to before me this I day of August, Nonde

My commission Expires

#### **Notary Public**

2017



Change slightly during<br/>partment's review:General<br/>about air quality and<br/>about air quality and<br/>the permitting proc-<br/>tess can be found at<br/>the Air Quality Bu-<br/>pollutant:<br/>Total sum of all Haz-<br/>ardous Air Pollutants<br/>(HAPs)General<br/>about air quality and<br/>the permitting proc-<br/>tess can be found at<br/>the Air Quality Bu-<br/>Olaulity Bu-<br/>to in the permit re-<br/>set of the Air Quality Bu-<br/>to in the permit re-<br/>set of the Air Quality Bu-<br/>to in the permit re-<br/>set of the Air Quality Bu-<br/>to in the permit re-<br/>to learn how and<br/>to learn how and<br/>to learn how and<br/>to learn how and<br/>to learn how and

Attención

maximum of 52 weeks

comunicarse con la oficina de Calidad de Aire al teléfono 505-476-5557.

Attencion Este es un aviso de la Agencia de Calidad de Aire del Departamento de Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor de

<b>Affidavit of Publication</b> State of New Mexico, County of Eddy, ss.		the construction of it , 07 min, 08 sec. Th	missions	could change slightly during				auas, 1X 75380-9050 mit review process, you must 525 Camino de los Marquez, s.html. Other comments and	ot yet received the permit the application and its air	public participation in	establecimiento en esta	required by applicable ments implemented by innation Act of 1975, y questions about this rdinator, New Metico as. If you believe that fiel above or visit our fiel above or visit our
<b>Danny Fletcher</b> , being first duly sworn, on oath says:	- 	tot an au quantry permut for the constra- sec and longitude -104 deg, 07 min,	er to control er	(tpy) and could			er year.	f the permit review Bureau; 525 Cami Lpermits html. 0	may have n y review of	ı dealing with <sub>j</sub>	ducidas por un .	or activities, as ination require the Age Discrit If you have an iminution Coo ior@rate.nm. dinator identii
That he is the Publisher of the Carlsbad Current-Argus, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the State wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:	OF AIR QUALITY PERMIT APPLICATION	ttal to the Air Quality ine Terminal, will be	radicar unioading. truck loading, storage tanks, fugitive piping components, and a scrubber to control emissions	any regulated air contaminant will be as follows in pound per hour (pph) and tons per year	Pounds per hour Tons per year	76 pph 5.5 tpy	the facility will be continuous <u>7</u> days a week and a maximum of <u>52</u> weeks per year. Rice Manager Sumaby Chain Occidantel Chamical Commentation D. D. D. accorded	this faci s Manag 800 22	ure, or send a copy of this notice along with your comments, since the Department alling address with your comments. Once the Department has performed a preliminar be published in the legal section of a newspaper circulated near the facility location.	process can be found at the Air Quality Bureau's web si lation can be found in the "Permits" section of this we	Attención Este es un aviso de la Agencia de Calidad de Aire del Departamento de Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usied déseu información en español, por favor de comunicarse con la oficina de Calidad de Aire al teléfono 505-476-5557.	Notice of Non-Disc national origin, disability, age or thon of compliance efforts and re Act of 1964, as amended; Sectio ection 13 of the Foderal Water Po us, policies or procedures, you m (4050, P.O. Bor 5469, Santa Fe, MED program or activity, you r in to learn how and where to file
August 32017That the cost of publication is	NOTICE ounces its appli	ty known a	ilcar unloading, tru	regulated ai				uction or o ldress: Pern 16; (505) 2	name, or su mailing ad	the permitting MAC. This regu	Aire del De	Trace, color, for coordinat Civil Rights 1972, and Se tion program of Dr., Suite A sepect to a M
<b>\$287.84</b> and that payment thereof has been made and will be	Nonnene	ted date of a osed facility	a - 0	les of any leview:		ollutants	operating schedules of of the Facility is: Jack	the constr to this ac 87505-18 ully.	e and site name, ble return mailin 's notice will be p	nality and 72.206 N	alidad de.	the basis of esponsible VI of the intents of liscrimina St. Franci inst with r w/NMED/
assessed as court costs.	emical Corporati	erminal facility. The expected or xact location for the proposed simult location of this facility.	The proposed construction consists of	stimated maximum quantities of a surse of the Department's review:		sum of all Hazardous Air Pollutants (HAPs)	landard and maximum operating sche wner and/or operator of the Facility	have any comments about the construction or operation of .your comments in writing to this address: Permit Program 1; Santa Fe, New Mexico; 87505-1816; (505) 476-4300; 1 ons may be submitted verbally.	to the company name and site na Please include a legible return m ots, the Department's notice will	al information about air quintin review process is 20.2.	de la Agencia de C lesea información	D does not discriminate on the basis of race, and regulations. NMED is responsible for co ER. Part 7, including Title VI of the Civil F X of the Education Amendments of 1972, i. or any of NMED's non-discrimination p onnent Department, 1190 St. Francis Dr., we been discriminated against with respect e at https://www.env.nm.gov/NMED/EJfin
Subscribed and sworn to before me this <u>4</u> day of <u>August</u> , <u>201</u> 7	Occidental Chemical	acid terminal The exact loca monovimente lu	The proposed	The estimated the course of 1		Total sum of a	The owner and		Please refer to the application. Ple quality impacts,	ieneral inform he permit revi	iste es un aviso rea. Si usted o	NMED does no laws and regulation does not the Tritle IX of the notice or any of Environment I you haw been you haw been
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My commission Expires <u>2//3/2/</u>												
Notary Public												
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### Written Description of the Routine Operations of the Facility

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

The terminal will have a railcar unloading rack, three muriatic acid storage tanks, one water storage tank, a water scrubber, and a truck loading rack. Railcars containing muriatic acid will enter the facility and unload to one of three storage tanks. Muriatic acid will then be loaded into trucks at full strength or diluted with water for a reduced concentration. The three muriatic acid tanks and truck loading will vent to a water scrubber to control emissions. Trucks entering the facility were pressure unloaded using an on-board compressor so will need to be depressurized before filling. Truck degassing emissions associated with depressurizing will vent to the scrubber.

Startup, shutdown, maintenance, and malfunction (SSM/M) emissions are also included for times when the scrubber or piping may require maintenance or shutdown. Maintenance surface coating and solvent usage records will be maintained to show compliance with 20.2.72.202.B.6 NMAC. Emissions associated with any additional maintenance activities, including any temporary portable engines, will demonstrate compliance with 20.2.72.202.B.5 NMAC through record keeping.

#### **Source Determination**

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

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

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

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

#### **B.** Apply the 3 criteria for determining a single source:

<u>SIC</u> <u>Code</u>: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, <u>OR</u> surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.

■ Yes □ No

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

■ Yes □ No

<u>Contiguous or Adjacent</u>: 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, <u>does not</u> constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

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

(Submitting under 20.2.72, 20.2.74 NMAC)

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

- A. This facility is:
  - **a** minor PSD source before and after this modification (if so, delete C and D below).
  - □ a major PSD source before this modification. This modification will make this a PSD minor source.
  - □ an existing PSD Major Source that has never had a major modification requiring a BACT analysis.
  - □ an existing PSD Major Source that has had a major modification requiring a BACT analysis
  - □ a new PSD Major Source after this modification.
- B. This facility is not one of the listed 20.2.74.501 Table I PSD Source Categories. The "project" emissions for this modification are not significant. The facility does not emit any pollutants subject to PSD review. The "project" emissions listed below do 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: 0 TPY
  - b. CO: 0 TPY
  - c. VOC: 0 TPY
  - d. SOx: 0 TPY
  - e. TSP (PM): 0 TPY
  - f. **PM10: 0 TPY**
  - g. PM2.5: 0 TPY
  - h. Fluorides: 0 TPY
  - i. Lead: 0 TPY
  - j. Sulfur compounds (listed in Table 2): 0 TPY
  - k. GHG: 0 TPY

Sources in this application do not emit PSD regulated pollutants, so PSD review is not applicable.

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

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

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

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

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

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

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

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

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

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

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

#### Federally Enforceable Conditions:

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

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

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

#### 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	
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	No	Facility	The facility does not emit any pollutants with ambient air quality standards.
20.2.7 NMAC	Excess Emissions	Yes	Facility	
20.2.38 NMAC	Hydrocarbon Storage Facility	No	Facility	The facility will not have any hydrocarbon storage tanks.
20.2.61.109 NMAC	Smoke & Visible Emissions	No	Facility	The facility does not include any stationary combustion equipment.
20.2.70 NMAC	Operating Permits	No	Facility	The facility only emits HCl, which is a HAP, and the potential to emit is below 10 tpy.
20.2.71 NMAC	Operating Permit Fees	No	Facility	The facility will not have an operating permit.
20.2.72 NMAC	Construction Permits	Yes	Facility	A construction permit is required since the uncontrolled potential to emit HAP is greater than 10 tons/yr. Use of a control device will limit emissions below major source thresholds.
20.2.73 NMAC	NOI & Emissions Inventory Requirements	No	Facility	The facility potential to emit is below the levels specified in 20.2.73.300.B NMAC. However, an emission inventory will be submitted if requested as specified in 20.2.73.300.B.4 NMAC.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	Facility	The facility does not emit any PSD regulated air pollutants.
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	This is a 20.2.72 NMAC application that is subject to a \$500 permit filling fee per 20.2.75.10, additional permitting fees per 20.2.75.11, and a \$1,500 annual fee per 20.2.75.11.E. Note: the NMED website indicates the annual NSR fee is \$1,907.
20.2.77 NMAC	New Source Performance	No	Units subject to 40 CFR 60	Emission sources at the facility are not subject to any New Source Performance Standards in 40 CFR 60.
20.2.78 NMAC	Emission Standards for HAPS	No	Units Subject to 40 CFR 61	This facility emits hazardous air pollutants but is not subject to the requirements of 40 CFR Part 61.
20.2.79 NMAC	Permits – Nonattainment Areas	No	Facility	The facility is not located in a non-attainment area and does not emit any pollutants that would be subject to non-attainment review.
20.2.82 NMAC	MACT Standards for source categories of HAPS	No	Units Subject to 40 CFR 63	The facility is an area source of HAP and is not subject to any subpart in 40 CFR 63.

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 50	NAAQS	No	Facility	The facility does not emit any pollutants with ambient air quality standards.
NSPS 40 CFR 60, Subpart A	General Provisions	No	Units subject to 40 CFR 60	The facility is not subject to any subparts under 40 CFR 60.
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	TANKS	The storage vessels do not store organic liquids.
NESHAP 40 CFR 61 Subpart A	General Provisions	No	Units Subject to 40 CFR 61	This facility emits hazardous air pollutants but is not subject to the requirements of 40 CFR Part 61.
MACT 40 CFR 63, Subpart A	General Provisions	No	Units Subject to 40 CFR 63	The facility is an area source of HAP and is not subject to any subpart in 40 CFR 63.
40 CFR 64	Compliance Assurance Monitoring	No	Facility	The facility is not subject to Title V permitting.
40 CFR 68	Chemical Accident Prevention	No	Facility	The threshold quantity for hydrochloric acid applies to concentrations of 37% or more. Hydrochloric acid handled at the facility will have a concentration of 36% or less.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	Yes	N/A	82.150 – Comfort cooling systems will use non-exempt substitute refrigerants. Installation and maintenance will be performed by certified technicians and comply with all requirements of 40 CFR 82, Subpart F.

#### Table for Applicable FEDERAL REGULATIONS:

### **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 <u>Operational Plan to Mitigate Emissions During Startups</u>, <u>Shutdowns</u>, <u>and Emergencies</u> 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.

An operational plan to mitigate emissions during startup, shutdown, maintenance, and malfunctions will be developed and maintained on-site.

### **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.

The facility does not have alternative operating scenarios.

### Section 16 Air Dispersion Modeling

- 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 (<u>http://www.env.nm.gov/aqb/permit/app\_form.html</u>) 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).	Х
See #1 above. Note: Neither modeling nor a modeling waiver is required for VOC emissions.	
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3	
above.	
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit	
replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application	
(20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4),	Х
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:

- $\hfill\square$  See attached, approved modeling waiver for all pollutants from the facility.
- □ See attached, approved modeling **waiver for some** pollutants from the facility.
- □ Attached in Universal Application Form 4 (UA4) is a modeling report for all pollutants from the facility.
- □ Attached in UA4 is a **modeling report for some** pollutants from the facility.
- No modeling is required.

Hydrogen chloride (HCl) is the only pollutant emitted from the facility and it does not have a national or New Mexico ambient air quality standard.

### **Compliance Test History**

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

A compliance test history cannot be submitted because the facility and emission sources in this application have not been constructed.

### **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.

Construction will occur in two phases. However, all equipment and maximum throughput rates for the final phase are included in this application.

**Occidental Chemical Corporation** 

Aventine Terminal Application Date: August 2017 & Revision #0

# **Section 22: Certification**

Company Name: Occidental Chemical Corporation

I, <u>Jack Rice</u>, hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 10th day of August \_\_\_\_\_\_ ao17 \_\_\_ upon my oath or affirmation, before a notary of the State of

Signature

Jack Rice	
Printed Name	

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Date		

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<u>Manager Supply Chain</u> Title

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My authorization as a notary of the State of <u>Texas</u> expires on the

agth day of January	. 2018
VA Areas	<b>G</b> UD (20) O
Notary's Signature	<u></u>
Xochill Martinez	XOCHITL MARTINEZ Notary Public, State of Texas My Commission Expires January 29, 2018

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

Saved Date: 8/10/2017