

ATTACHMENT Q



NMED AIR QUALITY APPLICATION TITLE V RENEWAL APPLICATION

**El Paso Natural Gas Company, L.L.C.
Blanco Compressor Station A**

Prepared By:

Kinder Morgan
2 North Nevada Avenue,
Colorado Springs, CO 80903
(719) 473-2300

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February 2019

Project 193201.0009



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February , 2018

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

*RE: Application for Title V Renewal
El Paso Natural Gas Company, L.L.C. – Blanco Compressor Station A*

Dear Mr. Shooley:

On behalf of El Paso Natural Gas Company L.L.C., we are submitting an application for a Title V Renewal for Blanco Compressor Station A. The facility is located approximately 0.1 miles north of Bloomfield, NM in San Juan County. The facility is currently authorized to operate under NSR Permits (SSM) and Operating Permit 0613-M9.

The format and content of this application are consistent with the Bureau's current policy regarding Title V applications. Title V Permit P048-R3 expires on February 16, 2020. This application is being submitted in accordance with 20.2.70.300.B.2 NMAC, requiring a timely application for a Title V renewal be submitted at least 12 months prior to the date of permit expiration.

Enclosed are two hard copies of the application, including an original certification and two discs containing the electronic files. Please feel free to contact either myself at (505) 266-6611 or Travis Ray, Specialist – Permitting and Compliance with Kinder Morgan, Inc., at (719) 520-3786 if you have any questions regarding this application.

Sincerely,

Trinity Consultants

Adam Erenstein
Manager of Consulting Services

Cc: Travis Ray
Trinity Project File: 193201.0009

Mail Application To: New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505 Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb		For Department use only: AIRS No.:
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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 ☐ The full permit fee associated with 10 fee points (required w/ streamline applications).
- ☐ Check No.: N/A in the amount of N/A
- ☒ I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.
- ☐ This facility qualifies to receive assistance from the Small Business Environmental Assistance program (SBEAP) and qualifies for 50% of the normal application and permit fees. Enclosed is a check for 50% of the normal application fee which will be verified with the Small Business Certification Form for your company.
- ☐ This facility qualifies to receive assistance from the Small Business Environmental Assistance Program (SBEAP) but does not qualify for 50% of the normal application and permit fees. To see if you qualify for SBEAP assistance and for the small business certification form go to https://www.env.nm.gov/aqb/sbap/small_business_criteria.html).

Citation: Please provide the **low level citation** under which this application is being submitted: **20.2.70.300.B.2 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

Section 1-A: Company Information

		AI # if known (see 1 st 3 to 5 #s of permit IDEA ID No.): 1147	Updating Permit/NOI #: P048-R3
1	Facility Name: Blanco Compressor Station A	Plant primary SIC Code (4 digits): 4922	
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): From the intersection of Highway 550 and North 1 st Street head in Bloomfield, NM, head north on North 1 st Street for approximately 1.5 miles. Turn right onto Rd 4900/Arizona Rd. After approximately 0.7 miles, the facility will be on your right.		
2	Plant Operator Company Name: El Paso Natural Gas Company, L.L.C	Phone/Fax: (719) 473-2300	

a	Plant Operator Address: 2 North Nevada Avenue, Colorado Springs, CO 80903.	
b	Plant Operator's New Mexico Corporate ID or Tax ID: 46-0809216	
3	Plant Owner(s) name(s): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (719) 473-2300
a	Plant Owner(s) Mailing Address: 2 North Nevada Avenue, Colorado Springs, CO 80903.	
4	Bill To (Company): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (719) 520-3786
a	Mailing Address: 2 North Nevada Avenue, Colorado Springs, CO 80903	E-mail: Travis_Ray@kindermorgan.com
5	☒ Preparer: Trinity Consultants ☐ Consultant: Adam Erenstein	Phone/Fax: 505-266-6611
a	Mailing Address: 9400 Holly Ave NE Bldg 3 Suite 300, Albuquerque, NM 87122	E-mail: aerenstein@trinityconsultants.com
6	Plant Operator Contact: Bronson Ashcroft	Phone/Fax: (505) 632-6270
a	Address: 81 County Road 4900, Bloomfield, NM 87413	E-mail: Bronson_Ashcroft@kindermorgan.com
7	Air Permit Contact: Travis Ray	Title: Specialist – Permitting and Compliance
a	E-mail: Travis_Ray@KinderMorgan.com	Phone/Fax: (719) 520-3786
b	Mailing Address: 2 North Nevada Avenue, Colorado Springs, CO 80903	

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? ☐ Yes ☒ No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? ☒ Yes ☐ No
3	Is the facility currently shut down? ☐ Yes ☒ No	If yes, give month and year of shut down (MM/YY): N/A
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? ☒ Yes ☐ No	
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972? ☐ Yes ☐ No ☒ N/A	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? ☒ Yes ☐ No	If yes, the permit No. is: P-048-R3
7	Has this facility been issued a No Permit Required (NPR)? ☐ Yes ☒ No	If yes, the NPR No. is: N/A
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes ☒ No	If yes, the NOI No. is: N/A
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? ☒ Yes ☐ No	If yes, the permit No. is: 0613-M10R1
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? ☐ Yes ☒ No	If yes, the register No. is: N/A

Section 1-C: Facility Input Capacity & Production Rate

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 53.3 MMscf*	Daily: 1,280 MMscf*	Annually: 467,200 MMscf*
b	Proposed	Hourly: 53.3 MMscf*	Daily: 1,280 MMscf*	Annually: 467,200 MMscf*
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: 53.3 MMscf*	Daily: 1,280 MMscf*	Annually: 467,200 MMscf*
b	Proposed	Hourly: 53.3 MMscf*	Daily: 1,280 MMscf *	Annually: 467,200 MMscf*

*Capacities are provided for informational purposes only and are not intended to be a limit.

Section 1-D: Facility Location Information

1	Section: 14	Range: 11E	Township: 29N	County: San Juan	Elevation (ft): 5,605
2	UTM Zone: ☐ 12 or ☒ 13			Datum: ☐ NAD 27 ☐ NAD 83 ☒ WGS 84	
a	UTM E (in meters, to nearest 10 meters): 236,040 m E			UTM N (in meters, to nearest 10 meters): 4,068,810 m N	
b	AND Latitude (deg., min., sec.): 36°43'42" N			Longitude (deg., min., sec.): 107°57'21" W	
3	Name and zip code of nearest New Mexico town: Bloomfield, NM, 87413				
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary):				
5	The facility is 0.1 miles North of Bloomfield, NM.				
6	Status of land at facility (check one): ☒ Private ☐ Indian/Pueblo ☐ Federal BLM ☐ Federal Forest Service ☐ Other (specify)				
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: Municipalities: Aztec, Bloomfield, Farmington; Indian Tribes: None; Counties: Rio Arriba County, San Juan County				
8	20.2.72 NMAC applications only: Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see www.env.nm.gov/aqb/modeling/class1areas.html)? ☐ Yes ☐ No ☒ N/A – This application is a Title V application being submitted under 20.2.70.303.B.2 (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: Other States: Bernalillo County: Class I Area:				
9	Name nearest Class I area: Mesa Verde National Park				
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 64 km				
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: 200 m				
12	Method(s) used to delineate the Restricted Area: Continuous Fencing “Restricted Area” is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.				
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC? ☐ Yes ☒ No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.				
14	Will this facility operate in conjunction with other air regulated parties on the same property? ☒ No ☐ Yes If yes, what is the name and permit number (if known) of the other facility? N/A				

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

1	Facility maximum operating ($\frac{\text{hours}}{\text{day}}$): 24	($\frac{\text{days}}{\text{week}}$): 7	($\frac{\text{weeks}}{\text{year}}$): 52	($\frac{\text{hours}}{\text{year}}$): 8760
2	Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start: N/A		☐ AM ☐ PM	End: N/A ☐ AM ☐ PM
3	Month and year of anticipated start of construction: N/A – No proposed construction			
4	Month and year of anticipated construction completion: N/A – No proposed construction			
5	Month and year of anticipated startup of new or modified facility: N/A – No proposed construction			
6	Will this facility operate at this site for more than one 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: N/A		
a	If yes, NOV date or description of issue: N/A	NOV Tracking No: N/A	
b	Is this application in response to any issue listed in 1-F, 1 or 1a above? ☐ Yes ☒ No If Yes, provide the 1c & 1d info below:		
c	Document Title: N/A	Date: N/A	Requirement # (or page # and paragraph #): N/A
d	Provide the required text to be inserted in this permit: N/A		
2	Is air quality dispersion modeling or modeling waiver being submitted with this application? ☐ Yes ☒ No		
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? ☐ Yes ☒ No		
4	Will this facility be a source of federal Hazardous Air Pollutants (HAP)? ☒ Yes ☐ No		
a	If Yes, what type of source? ☒ Major (☒ ≥ 10 tpy of any single HAP OR ☒ ≥ 25 tpy of any combination of HAPS) OR ☐ Minor (☐ < 10 tpy of any single HAP AND ☐ < 25 tpy of any combination of HAPS)		
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☐ Yes ☒ No		
a	If yes, include the name of company providing commercial electric power to the facility: N/A Commercial power is purchased from a commercial utility company, which specifically does not include power generated on site for the sole purpose of the user.		

Section 1-G: Streamline Application

(This section applies to 20.2.72.300 NMAC Streamline applications only)

1	☐ I have filled out Section 18, "Addendum for Streamline Applications." ☒ N/A (This is not a Streamline application.)
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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): Donald W. Perkins		Phone: (970) 208-1268
a	R.O. Title: Director, Operations	R.O. e-mail: Don_Perkins@kindermorgan.com	
b	R. O. Address: 2527 Foresight Circle, Grand Junction, CO 81505		
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC): Joe McLaughlin		Phone: (713) 369-9847
a	A. R.O. Title: Vice President, Operations	A. R.O. e-mail: Joe_McLaughlin@kindermorgan.com	
b	A. R. O. Address: 1001 Louisiana St., Suite 1000, Houston, TX, 77022		
3	Company's Corporate or Partnership Relationship to any other Air Quality Permittee (List the names of any companies that have operating (20.2.70 NMAC) permits and with whom the applicant for this permit has a corporate or partnership relationship): El Paso Natural Gas Company, L.L.C. was formerly named "El Paso Natural Gas Company" (until 8/6/2012); both names may appear on operating permits, and refer to the same company.		
4	Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.): Kinder Morgan, Inc.		
a	Address of Parent Company: 1001 Louisiana St., Suite 1000, Houston, TX 77002		
5	Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are owned, wholly or in part, by the company to be permitted.): N/A - El Paso Natural Gas Company, L.L.C. has no subsidiaries.		
6	Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: Travis Ray (719) 520-3786 & Bronson Ashcroft (505) 632-6270		

7	Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B)? If yes, state which ones and provide the distances in kilometers: Colorado (32 km); Local Air Pollution Control Programs: none; Indian Tribes/Pueblos: None
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Section 1-I – Submittal Requirements

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

Hard Copy Submittal Requirements:

- 1) One hard copy **original signed and notarized application package printed double sided ‘head-to-toe’ 2-hole punched** as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be **head-to-head**. Please use **numbered tab separators** in the hard copy submittal(s) as this facilitates the review process. For NOI submittals only, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required. **Please include a copy of the check on a separate page.**
- 2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This **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 **summary report only** 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.

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Table 2-A: Regulated Emission Sources

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

Unit Number ¹	Source Description	Make	Model #	Serial #	Manufacturer's Rated Capacity ³ (Specify Units)	Requested Permitted Capacity ³ (Specify Units)	Date of Manufacture ²	Controlled by Unit #	Source Classification Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) ⁴	Replacing Unit No.
							Date of Construction/Reconstruction ²	Emissions vented to Stack #				
A-01	RICE	Cooper Bessemer	GMV10-TF	43051	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-01				
A-02	RICE	Cooper Bessemer	GMV10-TF	43050	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-02				
A-03	RICE	Cooper Bessemer	GMV10-TF	43052	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-03				
A-04	RICE	Cooper Bessemer	GMV10-TF	43058	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-04				
A-05	RICE	Cooper Bessemer	GMV10-TF	43054	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-05				
A-06	RICE	Cooper Bessemer	GMV10-TF	43057	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-06				
A-07	RICE	Cooper Bessemer	GMV10-TF	43053	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-07				
A-08	RICE	Cooper Bessemer	GMV10-TF	43055	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-08				
A-09	RICE	Cooper Bessemer	GMV10-TF	43056	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-09				
A-10	RICE	Cooper Bessemer	GMV10-TF	43400	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-10				
A-11	RICE	Cooper Bessemer	GMV10-TF	43399	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-11				
A-12	RICE	Cooper Bessemer	GMV10-TF	43398	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-12				
A-13	RICE	Cooper Bessemer	GMV10-TF	43397	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-13				
A-14	RICE	Cooper Bessemer	GMV10-TF	42008	1100 hp	943 hp	Unknown	N/A	20200252	☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	20.2.61 NMAC	N/A
							August 1953	A-14				

¹ 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.

² Specify dates required to determine regulatory applicability.

³ 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.

Table 2-B: Insignificant Activities¹ (20.2.70 NMAC) OR Exempted Equipment (20.2.72 NMAC)

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

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²	For Each Piece of Equipment, Check One
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction ²	
Various	Storage Tanks	Various	N/A	< 500			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	gallons	Item #5	< 8/23/2011	
Various	Storage Tanks	Various	N/A	Varies			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	gallons	Item #5	< 8/23/2011	
Various	Storage Tanks	Various	N/A	< 25,000			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	gallons	Item #5	< 8/23/2011	
KO	Knockout Vessel	N/A	N/A	1,000			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	gallons	Item #5	< 8/23/2011	
T-1	Lube Oil	N/A	N/A	8,820			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	gallons	Item #5	< 8/23/2011	
T-2	Lube Oil	N/A	N/A	8,820			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	gallons	Item #5	< 8/23/2011	
PURGE-01	Scrubber blowdown	N/A	N/A	500			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	scf/hr	Item #1.a	Unknown	
F-001	Fugitive Emissions	N/A	N/A	N/A			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			N/A	N/A	Item #1.a.	Unkown	
1	Torpedo Heater	Dayton	3VE49A	0.075			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			1044AFF0422	MMBtu/hr	Item #1.a.	2011	
2	Torpedo Heater	Dayton	3VE49A	0.075			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			1044AFF0423	MMBtu/hr	Item #1.a.	2011	
3	Torpedo Heater	Dayton	3VE49A	0.075			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			1127AFF0071	MMBtu/hr	Item #1.a.	2011	
4	Line Heater	Reddy Heater	Unkown	0.1			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			1359298	MMBtu/hr	Item #1.a.	2011	
5	Line Heater	National-Riverside Co.	K150FA	0.15			☒ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
			2223	MMBtu/hr	Item #1.a.	2011	

¹ 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.

² Specify date(s) required to determine regulatory applicability.

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.

¹ List each control device on a separate line. For each control device, list all emission units controlled by the control device.

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

Unit No.	NOx		CO		VOC		SOx		TSP ²		PM10 ²		PM2.5 ²		H ₂ S		Lead	
	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
SSM/M	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	0.82	9.10E-04	-	-
Totals	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	0.82	9.1E-04		

¹ 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.

¹ **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-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 Number	Serving Unit Number(s) from Table 2-A	Orientation (H=Horizontal V=Vertical)	Rain Caps (Yes or No)	Height Above Ground (ft)	Temp. (F)	Flow Rate		Moisture by Volume (%)	Velocity (ft/sec)	Inside Diameter (ft)
						(acfs)	(dscfs)			
A-01	A-01	V	N	30	650	139	N/A	N/A	100	1.33
A-02	A-02	V	N	30	650	139	N/A	N/A	100	1.33
A-03	A-03	V	N	30	650	139	N/A	N/A	100	1.33
A-04	A-04	V	N	30	650	139	N/A	N/A	100	1.33
A-05	A-05	V	N	30	650	139	N/A	N/A	100	1.33
A-06	A-06	V	N	30	650	139	N/A	N/A	100	1.33
A-07	A-07	V	N	30	650	139	N/A	N/A	100	1.33
A-08	A-08	V	N	30	650	139	N/A	N/A	100	1.33
A-09	A-09	V	N	30	650	139	N/A	N/A	100	1.33
A-10	A-10	V	N	30	650	139	N/A	N/A	100	1.33
A-11	A-11	V	N	30	650	139	N/A	N/A	100	1.33
A-12	A-12	V	N	30	650	139	N/A	N/A	100	1.33
A-13	A-13	V	N	30	650	139	N/A	N/A	100	1.33
A-14	A-14	V	N	30	650	139	N/A	N/A	100	1.33

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.

[illegible]

Table 2-J: Fuel

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

Unit No.	Fuel Type (low sulfur Diesel, ultra low sulfur diesel, Natural Gas, Coal, ...)	Fuel Source: purchased commercial, pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Specify Units				
			Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
A-01	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-02	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-03	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-04	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-05	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-06	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-07	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-08	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-09	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-10	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-11	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-12	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-13	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A
A-14	Sweet Natural Gas	Pipeline Quality Natural Gas	902 BTU/scf	10.17 Mscf	89.05 MMscf	N/A	N/A

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

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

Roof Type	Seal Type, Welded Tank Seal Type		Seal Type, Riveted 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	
Note: 1.00 bbl = 0.159 M ³ = 42.0 gal					MG: Medium Gray	
					BL: Black	
					OT: Other (specify)	

Note: $1.00 \text{ bbl} = 0.159 \text{ M}^3 = 42.0 \text{ gal}$

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

[illegible]

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.

[illegible]

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

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

		CO ₂ ton/yr	N ₂ O ton/yr	CH ₄ ton/yr	SF ₆ ton/yr	PFC/HFC ton/yr ²									Total GHG Mass Basis ton/yr ⁴	Total CO ₂ e ton/yr ⁵
Unit No.	GWPs ¹	1	298	25	22,800	footnote 3										
A-01 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.6224	2.21												4703
A-02 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-03 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-04 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-05 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-06 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-07 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-08 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-09 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-10 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-11 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-12 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-13 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
A-14 ⁶	mass GHG	4698	0.0088	0.088											4698	
	CO ₂ e	4698	2.62	2.21												4703
SSM/M	mass GHG	10	-	450											460	
	CO ₂ e	10	-	11250												11260
Total	mass GHG														66236	
	CO ₂ e															77103

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

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

³ For each new compound, enter the appropriate GWP for each HFC or PFC compound from Table A-1 in 40 CFR 98.

⁴ Green house gas emissions on a mass basis is the ton per year green house gas emission before adjustment with its GWP.

⁵ CO₂e means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the green house gas by its GWP.

⁶ Compressor Engine GHG emission were updated with the current fuel heating value.

Section 3

Application Summary

The **Application Summary** 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.

This application is being submitted for the renewal of Operating Permit P048-R3 for Blanco Compressor Station A (Blanco A). The facility is owned and operated by El Paso Natural Gas Company, L.L.C. (EPNG), a Kinder Morgan company. This submittal is pursuant to 20.2.70.300.B.2 NMAC which requires a Title V renewal application be submitted at least twelve months prior to expiration of the current permit. Title V Permit P048-R3 expires on February 16, 2020.

Blanco A is currently permitted under Operating Permit P048-R3 (issued February 16, 2015) and NSR Permits 613-M10R1. The facility is a Title V major source. The facility is located approximately 0.1 miles northeast of Bloomfield in San Juan County, New Mexico.

Blanco Compressor Station A shares its NSR Permit with the following adjacent facilities:

Facility Name	Facility Owner/Operator	Facility Permits
Blanco C&D Compressor Station	Enterprise Field Services, LLC and Enterprise Products Operating, LLC	613-M12, P214-R3
San Juan Gas Plant	ConocoPhillips	613-M10R2, P124-R2M2

Blanco Compressor Station A is a compressor station which compresses natural gas for transportation purposes. Equipment at this facility includes fourteen Cooper Bessemer GMV10-TF reciprocating engines (units A-01 to A-14), and an emergency flare (unit FL-01) shared with Enterprise Field Services, LLC Blanco C&D Compressor Station. Startup, shutdown, and routine maintenance (SSM) emissions result from compressor and facility blowdowns. Insignificant activities include fugitive emissions (unit F-001), scrubber blowdown emissions (unit PURGE-01), engine startup and shutdown emissions, and several small heaters used for space heat.

Blanco Compressor Station A is a major source of NO_x under the Prevention of Significant Deterioration (PSD) rules, as currently permitted, and will remain a major source after the proposed Title V renewal. This facility will also remain a major source of NO_x, CO, formaldehyde and total HAPs for operating permit purposes under Title V (20.2.70 NMAC).

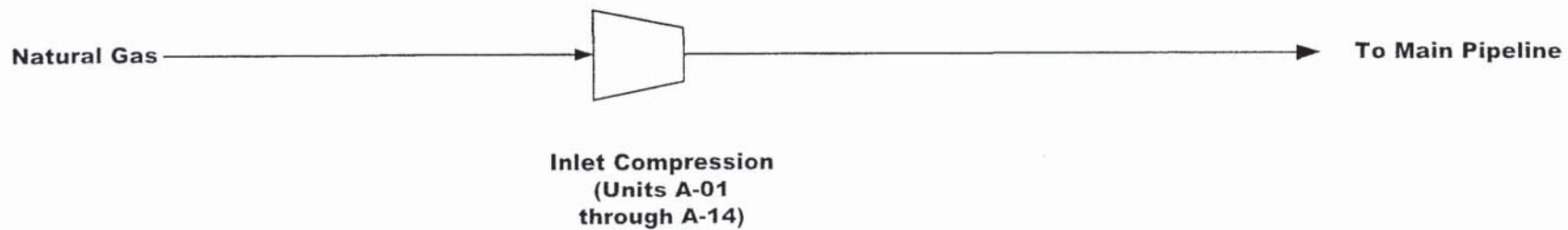
Section 4

Process Flow Sheet

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

A process flow diagram is attached.

Insignificant activities as defined in 20.2.70.7 NMAC are not included in the PFD.



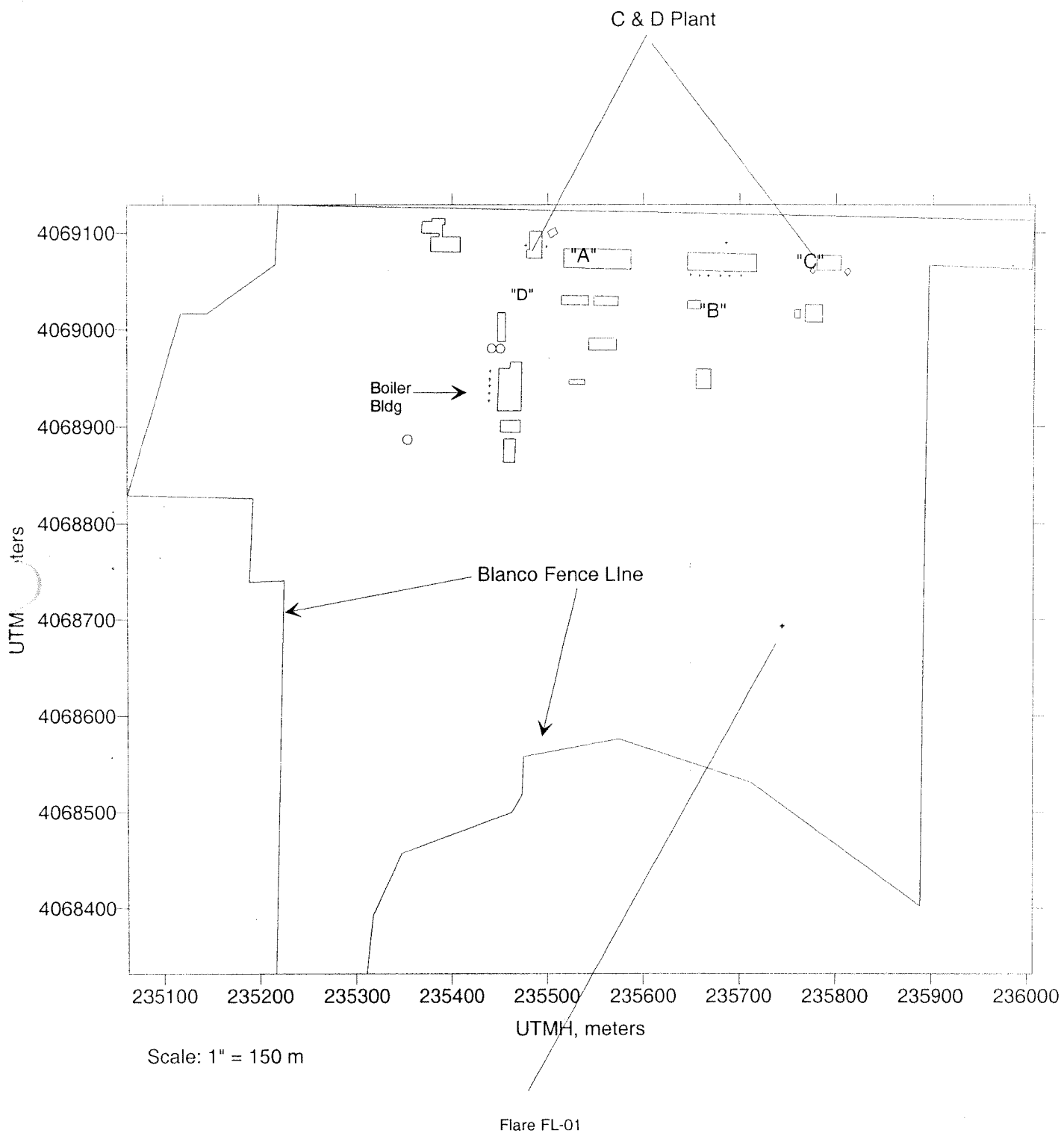
**Process Flow Diagram
Blanco A Compressor Station**

Section 5

Plot Plan Drawn To Scale

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

A plot plan is attached.



Section 5
Site Layout
El Paso Natural Gas Blanco Compressor Station

Section 6

All Calculations

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

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

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

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

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

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

Significant Figures:

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

B. At least 5 significant figures shall be retained in all intermediate calculations.

C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

- (1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
- (2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
- (3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
- (4) The final result of the calculation shall be expressed in the units of the standard.

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

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.

Emission units at Blanco Compressor Station A include the following:

- Fourteen Cooper-Bessemer GMV-10TF natural gas-fueled compressor engines, units A-01 through A-14
- One John Zink flare, unit FL-01 used to combust a small quantity of scrubber blowdown gas associated with activity PURGE-01, (an insignificant activity). This flare is shared with Blanco C&D Compressor Station.
- Facility fugitive emissions, unit F-001 (an insignificant activity)
- Engine startup and shutdown emissions, unit SSM/M
- Compressor and facility blowdown emissions, unit SSM/M
- A number of insignificant storage tanks

Emission calculations are reproduced from previous applications. Calculations and supporting data from previous applications are included where appropriate.

COOPER-BESSEMER GMV-10TF ENGINES (UNITS A-01 THROUGH A-14)

Emissions of NO_x, CO, SO₂, HAP(s), and VOC are as currently permitted in Operating Permit P048-R3. Emission factors from AP-42 Table 3.3.2-1 (April 1976) were used to calculate emissions of NO_x, CO, SO_x and VOC. The HAP emission rates are calculated using the latest edition of GRI-HAPCalc, version 3.01. Per the guidance in Table 2-I, individual HAPS are shown in Table 2-I. Individual HAP emission are shown if the HAP emits greater than or equal to 1 ton per year.

Emission factors from AP-42 Table 3.2-1 (August 2000) were used to calculate the TSP, PM₁₀, & PM_{2.5}. Greenhouse gas (GHG) emissions were calculated using 40 CFR 98 Subpart C emission factors. The GHG emission and particulate emissions were updated with the current fuel heating value.

JOHN ZINK EMERGENCY FLARE (UNIT FL-01, ACTIVITY PURGE-01)

The emergency flare is shared with Enterprise Field Services, LLC Blanco C&D Compressor Station. The flare is used to control scrubber blowdown emissions from activity PURGE-01. Activity PURGE-1 is an insignificant activity consisting of routing a 500 scf/hr periodic blowdown from Blanco Compressor Station A (4 hours/week, all year).

FUGITIVE EMISSIONS (UNIT F-001)

Facility fugitive VOC and GHG emissions have been calculated using emission factors from the EPA Protocol for Equipment Leak Emission Estimates. Fugitive emissions from the combined EPNG - Blanco Compressor Station A and Enterprise Products Operating LLC - Blanco C & D Compressor Station were quantified for the applications for Operating Permit P048 and NSR Permit 0613-M5. EPNG staff estimate that 30% of the total component count presented in the application for P048 can be reasonably apportioned to EPNG-Blanco Compressor Station A based on the equipment used at each facility. Facility-wide fugitive emissions qualify as an insignificant activity. Unit F-001 is listed in Table 2-B.

INSIGNIFICANT STORAGE TANKS

There are a number of storage tanks at the facility which are classified as insignificant activities as defined in 20.2.70.7 NMAC. These units are listed in Table 2-B. Emissions from these insignificant units are not shown in this application.

ROUTINE OR PREDICTABLE EMISSIONS DURING STARTUP, SHUTDOWN, AND MAINTENANCE (SSM/M)

Under NSR 0613-M9, the facility has chosen to consolidate both SSM and Malfunction per NMED guidance. Per Section 2.F of the implementation Guidance for permitting SSM Emissions and Excess Emissions (version 7 June 2012) "instead of permitting SSM and upset/malfunction emissions separately, the applicant may request that emissions from both SSM and upset/malfunction be consolidated in the permit."

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 (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO₂e 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 CO₂e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
4. Report GHG mass and GHG CO₂e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO₂e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following ☐ By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at <http://www.epa.gov/ttn/chief/ap42/index.html>
- EPA's Internet emission factor database WebFIRE at <http://cfpub.epa.gov/webfire/>
- 40 CFR 98 Mandatory Green House Gas Reporting 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 CO₂ over a specified time period.

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

Metric to Short Ton Conversion:

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

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

Cooper-Bessemer GMV-10TF

Emission unit: A-01 through A-14
 Source description: Natural gas-fired reciprocating engine
 Manufacturer: Cooper-Bessemer
 Model: GMV-10TF
 Type: Turbocharged, two-cycle, lean burn engine

Sea level hp: 1100 hp Manufacturer's data
 Actual site hp: 943 hp As currently permitted

Fuel Consumption

Fuel heat value: 902 Btu/scf As currently permitted
 Fuel consumption: 10.17 Mscf/hr As currently permitted
 Annual fuel usage: 89.05 MMsct/yr 8760 hrs/yr operation
 9.17 MMBtu/hr

Exhaust Parameters

Exhaust temp (Ta): 650 °F
 Stack diameter: 1.33 ft
 Exhaust velocity: 100 fps
 Stack height: 30 ft

Emission Factors			
Component	Emission Factor	Emission Factor Unit	Emission Factor Source
NO _x	24	lb/10 ³ hp-hr	Ap-42 Table 3.3.2-1 (4/76)
CO	3.1	lb/10 ³ hp-hr	Ap-42 Table 3.3.2-1 (4/76)
SO _x	0.004	lb/10 ³ hp-hr	Ap-42 Table 3.3.2-1 (4/76)
TSP/PM/PM ₁₀ /PM _{2.5} ¹	0.048	lb/MMBtu	Ap-42 Table 3.2-1 (2019)
VOC	9.7	lb/10 ³ hp-hr	Ap-42 Table 3.3.2-1 (4/76)
HCHO	1.39	tons/yr	GRI Hap Calc
Total Haps	2.27	tons/yr	Gri Hap Calc

¹TSP/PM/PM₁₀/PM_{2.5} emission factor are based on the sum of PM₁₀ filterable and PM condensable.

Emission Calculations

Pollutant	Emission per Unit		Basis	Total Emissions (14 units)	
	Hourly (lb/hr)	Annual (tpy)		Hourly (lb/hr)	Annual (tpy)
NO _x	21.91	95.97	As currently permitted	306.75	1343.58
CO	2.83	12.40	As currently permitted	39.62	173.60
SO ₂	0.0046	0.020	As currently permitted	0.064	0.28
TSP/PM/PM ₁₀ /PM _{2.5} ²	0.44	1.94	fuel heat value	6.20	27.16
VOC	0.89	3.90	As currently permitted	12.46	54.60
HCHO ³	0.32	1.39	As currently permitted	4.45	19.50
Total HAPs ³	0.52	2.27	As currently permitted	7.25	31.76

²TSP/PM/PM₁₀/PM_{2.5} emissions were updated with the current facility fuel heat value.

³HAPs & HCHO based on worst-case emission factors from GRI-HAPCalc

GHG Emission Calculations

Pollutant	Emission Factor (kg/MMBtu)	Emission Factor (lb/MMBtu) ⁴	Emissions Per Unit		Total Emissions	
			Hourly (lb/hr)	Annual (tpy)	Hourly (lb/hr)	Annual (tpy)
CO ₂ ⁵	53.06	116.98	1072.65	4698.21	15017.10	65774.91
CH ₄ ⁵	0.001	0.0022	0.020	0.0884	0.28	1.24
N ₂ O ⁵	0.0001	0.00022	0.0020	0.0088	0.03	0.12
			Total CO ₂ e:		15,033	65,843

⁴ Emission factors converted from kg/MMBtu to lb/MMBtu using a 2.2 lb/kg conversion.

⁵ Emission factors as per 40 CFR Part 98, Subpart C, Table C-2 for Natural Gas.

Fugitive Emissions (Insignificant Activity)

Emission Unit: F-001

Source Description: Fugitive Emissions from Fittings

Component Count	EPNG		duty		total
	total ¹	fraction	gas	liquid	
valves	1734	30%	520		520
pumps	28	30%	8		8
pressure relief, etc	27	30%	8		8
connectors	28	30%	4	4	8
flanges	6623	30%	1987		1987
open ended lines	313	30%	94		94
total	8753		2622		2626

VOC Emissions

Light Liquid Duty	count	kg/hr/source ²	kg/hr	lb/hr	tpy
valves	0	2.50E-03	0.00	0.00	0.00
pumps	0	1.30E-02	0.00	0.00	0.00
pressure relief, etc	0	7.50E-03	0.00	0.00	0.00
connectors	4	2.10E-04	8.82E-04	1.94E-03	0.01
flanges	0	1.10E-04	0.00	0.00	0.00
open ended lines	0	1.40E-03	0.00	0.00	0.00
total	4		8.82E-04	1.94E-03	0.0085
VOC fraction				100%	100%
VOC emissions				1.94E-03	0.0085

Gas Duty	count	kg/hr/source ²	kg/hr	lb/hr	tpy
valves	520	4.50E-03	2.34	5.15	22.56
pumps	8	2.40E-03	0.02	0.04	0.19
pressure relief, etc	8	8.80E-03	0.07	0.16	0.69
connectors	4	2.00E-04	8.40E-04	1.85E-03	0.01
flanges	1987	3.90E-04	0.77	1.70	7.47
open ended lines	94	2.00E-03	0.19	0.41	1.81
total	2622		3.40	7.47	32.72
VOC fraction				0.17%	0.17%
VOC emissions				0.013	0.057
Safety factor				100%	100%

Blanco A Total VOC fugitive emissions

0.030 0.13

GHG Emissions

	lb/hr	tpy
Blanco A Total CH ₄ fugitive emissions	14.41	63.13
Blanco A Total CO ₂ fugitive emissions	0.34	1.48
Blanco A Total CO ₂ e fugitive emissions	303	1,580

¹ Component count estimated by EPNG staff on the basis that 30% of the total fugitive emissions presented in the application for OP P048 can be reasonably apportioned to EPNG-Blanco Compressor Station A.

² Emission factors from the EPA Protocol for Equipment Leak Emission Estimates, Table 2-4 (1995).

Gas Speciation

Component	MW	Wet	Dry vol/mol%	MW * dry	LHV	Btu/scf * dry	Mass
		vol/mol %		vol %	Btu/scf	vol %	Fraction (dry)
Water	18.02	0.00%					
Nitrogen	28.01	0.34%	0.34%	0.094	0	0.00	0.57%
CO ₂	44.01	0.84%	0.84%	0.371	0	0.00	2.26%
H ₂ S	34.08	0.00%	0.00%	0.000	586.71	0.00	0.00%
Methane	16.04	98.48%	98.48%	15.798	909.1	895.24	96.43%
Ethane	30.07	0.30%	0.30%	0.091	1617.8	4.89	0.55%
Propane	44.10	0.02%	0.02%	0.007	2315.9	0.39	0.05%
I-Butane	58.12	0.00%	0.00%	0.002	3001	0.09	0.01%
N-Butane	58.12	0.01%	0.01%	0.003	3010.5	0.18	0.02%
I-Pentane	72.15	0.00%	0.00%	0.003	3697.9	0.15	0.02%
N-Pentane	72.15	0.00%	0.00%	0.000	3706.8	0.00	0.00%
Hexanes	86.18	0.02%	0.02%	0.013	4403.9	0.66	0.08%
C7+	100.21	0.00%	0.00%	0.000	5796.1	0.00	0.00%
Total		100%	100.0%	16.38		901.59	100%
Dry total		100%		(mixture mol. wt)		(mixture heating value)	

VOC mass fraction

0.17%

Scrubber Blowdown (Insignificant Activity)

Unit: FL-01
Activity: PURGE-01
Source Description: John Zink Emergency Flare

Worst Case Hourly Emissions:

Worst-case Hourly Blowdown Volume: 500 scf/hr
Flared Gas HHV: 1007 Btu/scf
Worst Case Heat Input: 0.50 MMBtu/hr

NO _x	CO	VOC*	
0.14	0.28	0.068	RG 109 high heat value
0.064	0.55		RG 109 low heat value
0.069	0.28	0.034	lb/hr
0.30	1.21	0.15	tpy

Annual Average Emissions:

Weekly Maximum Blowdown Volume: 2000 scf/wk
Annual Maximum Blowdown Volume: 104000 scf/yr
Flared Gas HHV: 1007 Btu/scf
Annual Maximum Heat Input: 104.73 MMBtu/yr

NO _x	CO	VOC*	
0.14	0.55	0.068	lb/MMBtu
14.45	57.56	7.12	lb/yr
0.0072	0.029	0.0036	tpy

*Assumes VOC = THC

SSM- H₂S Emissions

Unit: SSM/M1

Description: Facility-wide startup, shutdown, maintenance and malfunction emissions

Gas Analysis (Typical)

H ₂ S	0.25	gr H ₂ S	Nominal (Max amount allowed in pipeline quality natural gas)
	100	scf	

Compressor Blowdown Venting (BD-Unit)

SSM Emission Rates, Per Event

Event Description: [Planned Maintenance and Normal Shutdown](#)

Volume per event: 0.30 Mscf/event Estimated (varies)

H₂S Emissions: 0.00011 lb/event gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume: 1384.21 Mscf/yr Expected blowdown volume

H₂S Emissions: 0.00025 tons/yr gr/scf * scf/event * 1lb/7000gr * ton/2000 lb

Facility Blowdown Venting (BD-ESD)

SSM Emission Rates, Per Event

Event Description: [Station ESD](#)

Volume per event: 2300 Mscf/event Estimated (varies)

H₂S Emissions: 0.82 lb/event gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume: 2300 Mscf/yr Expected blowdown volume

H₂S Emissions: 4.11E-04 tons/yr gr/scf * scf/event * 1lb/7000gr * ton/2000 lb

Facility H₂S Total: 0.00066 tons/yr

Facility Blowdown Total

H₂S Emissions: 0.00091 tons/yr

Facility-Wide SSM/M Total

H₂S
0.00091 tons/yr

SSM Emissions

Unit: SSM
Description: Facility-wide SSM emissions

Gas Analysis (Typical)

VOC weight %:	2.00%	Nominal
CO2 weight %:	2.00%	Nominal
CH4 weight %:	90.00%	Nominal
Gas molecular weight:	17.00 lb/lb-mol	Nominal
Gas molar volume:	378.61 scf/lb-mol	Constant
Gas density:	0.045 lb/scf	Gas MW / Molar volume

Compressor Blowdown Venting (BD-Unit)

SSM Emission Rates, Per Event

Event Description:	Planned Maintenance and Normal Shutdown	
Volume per event:	0.30 Mscf/event	Estimated (varies)
VOC Emissions:	0.27 lb/event	lb/scf * scf/event * VOC wt %

SSM Emission Rates, Annual

Annual volume:	1384 Mscf/yr	Expected blowdown volume
VOC Emissions:	0.62 tons/yr	lb/scf * scf/event * VOC wt % * ton/2000 lb

Facility Blowdown Venting (BD-ESD)

SSM Emission Rates, Per Event

Event Description:	Station ESD	
Volume per event:	2300 Mscf/event	Estimated (varies)
VOC Emissions:	2065 lb/event	lb/scf * scf/event * VOC wt %

SSM Emission Rates, Annual

Annual volume:	2300 Mscf/yr	Assumes 1 event per year
VOC Emissions:	1.033 tons/yr	lb/event * event/year * ton/2000lb

Facility-wide VOC Total: 1.65 tons/yr

Facility Blowdown Total

VOC Emissions:	10.0 tons/yr	
HAP emissions:	0.069 tons/yr	Assumes same HAP/VOC ratio as fugitives
CO2 Emissions:	10.0 tons/yr	VOC Emissions / %VOC * %CO2
CH4 Emissions:	450.0 tons/yr	VOC Emissions / %VOC * %CH4
CO2e Emissions:	11260.0 tons/yr	

Facility-Wide SSM/M Total

VOC	HAP	CO2	CH4	CO2e	
10.0	0.069	10.0	450.0	11260.0	tons/yr

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

- ☒ If manufacturer data are used, include specifications for emissions units 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.
-

The following information used to determine emissions is attached:

COOPER-BESSEMER GMV-10TF ENGINES (UNITS A-01 THROUGH A-14)

- GRI-HAPCalc 3.01 output
- AP-42 Table 3.3.2-1 (April 1976)
- AP-42 Table 3.2-1 (August 2000)
- 40 CFR Part 98, Subpart C, Table C-1 & Table C-2 for Natural Gas.

JOHN ZINK EMERGENCY FLARE (UNIT FL-01, ACTIVITY PURGE-01)

- TNRCC's RG-109 *Air Permit Technical Guidance for Chemical Sources: Flares and Vapor Oxidizers* (10/00)

FUGITIVE EMISSIONS (UNIT F-001)

- EPA Protocol for Equipment Leak Emission Estimates, 1995

GRI-HAPCalc ® 3.01

Engines Report

Facility ID:	BLANCO	Notes:	Units R-A01 through R-A14:
Operation Type:	COMPRESSOR STATION		Cooper Bessemer GMV10-TF
Facility Name:	BLANCO COMPRESSOR STATION		engines (943 site hp / 1100
User Name:			maximum rated hp)
Units of Measure:	U.S. STANDARD		

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

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

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

Engine Unit

Unit Name: A01:14

Hours of Operation: 8,760 Yearly
 Rate Power: 1,100 hp
 Fuel Type: NATURAL GAS
 Engine Type: 2-Stroke, Lean Burn
 Emission Factor Set: EPA > FIELD > LITERATURE
 Additional EF Set: 2SLB COOPER

Calculated Emissions (ton/yr)

Chemical Name	Emissions	Emission Factor	Emission Factor Set
HAPs			
Formaldehyde	1.3927	0.13123430 g/bhp-hr	2SLB COOPER
Methanol	0.0869	0.00818480 g/bhp-hr	EPA
Acetaldehyde	0.2718	0.02561070 g/bhp-hr	EPA
1,3-Butadiene	0.0287	0.00270630 g/bhp-hr	EPA
Acrolein	0.2725	0.02567670 g/bhp-hr	EPA
Benzene	0.0679	0.00640270 g/bhp-hr	EPA
Toluene	0.0337	0.00317820 g/bhp-hr	EPA
Ethylbenzene	0.0038	0.00035640 g/bhp-hr	EPA
Xylenes(m,p,o)	0.0094	0.00088450 g/bhp-hr	EPA
2,2,4-Trimethylpentane	0.0296	0.00279210 g/bhp-hr	EPA
n-Hexane	0.0156	0.00146870 g/bhp-hr	EPA
Phenol	0.0015	0.00013890 g/bhp-hr	EPA
Styrene	0.0019	0.00018090 g/bhp-hr	EPA
Naphthalene	0.0034	0.00031780 g/bhp-hr	EPA
2-Methylnaphthalene	0.0007	0.00007060 g/bhp-hr	EPA
Acenaphthylene	0.0001	0.00001050 g/bhp-hr	EPA
Biphenyl	0.0001	0.00001300 g/bhp-hr	EPA
Acenaphthene	0.0000	0.00000440 g/bhp-hr	EPA
Fluorene	0.0001	0.00000560 g/bhp-hr	EPA
Anthracene	0.0000	0.00000240 g/bhp-hr	EPA
Phenanthrene	0.0001	0.00001170 g/bhp-hr	EPA
Ethylene Dibromide	0.0026	0.00024220 g/bhp-hr	EPA
Fluoranthene	0.0000	0.00000120 g/bhp-hr	EPA

Pyrene	0.0000	0.00000190 g/bhp-hr	EPA
Benz(a)anthracene	0.0000	0.00000110 g/bhp-hr	EPA
Chrysene	0.0000	0.00000220 g/bhp-hr	EPA
Benzo(e)pyrene	0.0000	0.00000010 g/bhp-hr	EPA
Vinyl Chloride	0.0009	0.00008150 g/bhp-hr	EPA
Methylene Chloride	0.0051	0.00048520 g/bhp-hr	EPA
1,1-Dichloroethane	0.0014	0.00012900 g/bhp-hr	EPA
1,3-Dichloropropene	0.0015	0.00014460 g/bhp-hr	EPA
Chlorobenzene	0.0016	0.00014650 g/bhp-hr	EPA
Chloroform	0.0016	0.00015540 g/bhp-hr	EPA
1,1,2-Trichloroethane	0.0018	0.00017390 g/bhp-hr	EPA
1,1,2,2-Tetrachloroethane	0.0023	0.00021880 g/bhp-hr	EPA
Carbon Tetrachloride	0.0021	0.00020030 g/bhp-hr	EPA
Propanal	0.0264	0.00249000 g/bhp-hr	GRI Field

Total 2.2678

Criteria Pollutants

PM	1.6920	0.15943960 g/bhp-hr	EPA
CO	6.6194	0.62374407 g/bhp-hr	2SLB COOPER
NMHC	11.9109	1.12236360 g/bhp-hr	GRI Field
NMEHC	4.2029	0.39604110 g/bhp-hr	EPA
NOx	114.5522	10.79424604 g/bhp-hr	2SLB COOPER
SO2	0.0206	0.00194060 g/bhp-hr	EPA

Other Pollutants

Butyraldehyde	0.0153	0.00144220 g/bhp-hr	EPA
Cyclohexane	0.0685	0.00645500 g/bhp-hr	GRI Field
Methane	26.0854	2.45803026 g/bhp-hr	2SLB COOPER
Ethylene	0.5860	0.05521797 g/bhp-hr	2SLB COOPER
Ethane	2.4832	0.23399430 g/bhp-hr	EPA
Propane	1.0052	0.09471980 g/bhp-hr	EPA
Isobutane	0.1313	0.01237630 g/bhp-hr	EPA
Butane	0.1664	0.01567660 g/bhp-hr	EPA
Cyclopentane	0.0033	0.00031250 g/bhp-hr	EPA
n-Pentane	0.0536	0.00504950 g/bhp-hr	EPA
Cyclohexane	0.0108	0.00101650 g/bhp-hr	EPA
Methylcyclohexane	0.0118	0.00111550 g/bhp-hr	EPA
1,2-Dichloroethane	0.0015	0.00013930 g/bhp-hr	EPA
1,2-Dichloropropane	0.0016	0.00014720 g/bhp-hr	EPA
n-Octane	0.0026	0.00024550 g/bhp-hr	EPA
1,2,3-Trimethylbenzene	0.0012	0.00011680 g/bhp-hr	EPA
1,2,4-Trimethylbenzene	0.0039	0.00036630 g/bhp-hr	EPA
1,3,5-Trimethylbenzene	0.0006	0.00005940 g/bhp-hr	EPA
n-Nonane	0.0011	0.00010170 g/bhp-hr	EPA
CO2	3,852.6775	363.03769350 g/bhp-hr	EPA

3.3.2 Heavy-Duty, Natural-Gas-Fired Pipeline Compressor Engines

by Susan Sercer
Alan Burgess
Tom Lahre

3.3.2.1 General¹ — Engines in the natural gas industry are used primarily to power compressors used for pipeline transportation, field gathering (collecting gas from wells), underground storage, and gas processing plant applications. Pipeline engines are concentrated in the major gas producing states (such as those along the Gulf Coast) and along the major gas pipelines. Both reciprocating engines and gas turbines are utilized, but the trend has been toward use of large gas turbines. Gas turbines emit considerably fewer pollutants than do reciprocating engines; however, reciprocating engines are generally more efficient in their use of fuel.

3.3.2.2 Emissions and Controls^{1,2} — The primary pollutant of concern is NO_x , which readily forms in the high temperature, pressure, and excess air environment found in natural-gas-fired compressor engines. Lesser amounts of carbon monoxide and hydrocarbons are emitted, although for each unit of natural gas burned, compressor engines (particularly reciprocating engines) emit significantly more of these pollutants than do external combustion boilers. Sulfur oxides emissions are proportional to the sulfur content of the fuel and will usually be quite low because of the negligible sulfur content of most pipeline gas.

The major variables affecting NO_x emissions from compressor engines include the air fuel ratio, engine load (defined as the ratio of the operating horsepower divided by the rated horsepower), intake (manifold) air temperature, and absolute humidity. In general, NO_x emissions increase with increasing load and intake air temperature and decrease with increasing absolute humidity and air fuel ratio. (The latter already being, in most compressor engines, on the "lean" side of that air fuel ratio at which maximum NO_x formation occurs.) Quantitative estimates of the effects of these variables are presented in Reference 2.

Because NO_x is the primary pollutant of significance emitted from pipeline compressor engines, control measures to date have been directed mainly at limiting NO_x emissions. For gas turbines, the most effective method of controlling NO_x emissions is the injection of water into the combustion chamber. Nitrogen oxides reductions as high as 80 percent can be achieved by this method. Moreover, water injection results in only nominal reductions in overall turbine efficiency. Steam injection can also be employed, but the resulting NO_x reductions may not be as great as with water injection, and it has the added disadvantage that a supply of steam must be readily available. Exhaust gas recirculation, wherein a portion of the exhaust gases is recirculated back into the intake manifold, may result in NO_x reductions of up to 50 percent. This technique, however, may not be practical in many cases because the recirculated gases must be cooled to prevent engine malfunction. Other combustion modifications, designed to reduce the temperature and/or residence time of the combustion gases, can also be effective in reducing NO_x emissions by 10 to 40 percent in specific gas turbine units.

For reciprocating gas-fired engines, the most effective NO_x control measures are those that change the air-fuel ratio. Thus, changes in engine torque, speed, intake air temperature, etc., that in turn increase the air-fuel ratio, may all result in lower NO_x emissions. Exhaust gas recirculation may also be effective in lowering NO_x emissions although, as with turbines, there are practical limits because of the large quantities of exhaust gas that must be cooled. Available data suggest that other NO_x control measures, including water and steam injection, have only limited application to reciprocating gas-fired engines.

Emission factors for natural-gas-fired pipeline compressor engines are presented in Table 3.3.2-1.

Table 3.3.2-1. EMISSION FACTORS FOR HEAVY-DUTY, NATURAL-GAS-FIRED PIPELINE COMPRESSOR ENGINES^a

EMISSION FACTOR RATING: A

	Nitrogen oxides (as NO ₂) ^b	Carbon monoxide	Hydrocarbons (as C) ^c	Sulfur dioxide ^d	Particulate ^e
Reciprocating engines					
lb/10 ³ hp-hr	24	3.1	9.7	0.004	NA
g/hp-hr	11	1.4	4.4	0.002	NA
g/kW-hr	15	1.9	5.9	0.003	NA
lb/10 ⁶ scf ^f	3,400	430	1,400	0.6	NA
kg/10 ⁶ Nm ^{3f}	55,400	7,020	21,800	9.2	NA
Gas turbines					
lb/10 ³ hp-hr	2.9	1.1	0.2	0.004	NA
g/hp-hr	1.3	0.5	0.1	0.002	NA
g/kW-hr	1.7	0.7	0.1	0.003	NA
lb/10 ⁶ scf ^g	300	120	23	0.6	NA
kg/10 ⁶ Nm ^{3g}	4,700	1,940	280	9.2	NA

^aAll factors based on References 2 and 3.

^bThese factors are for compressor engines operated at rated load. In general, NO_x emissions will increase with increasing load and intake (manifold) air temperature and decrease with increasing air-fuel ratios (excess air rates) and absolute humidity. Quantitative estimates of the effects of these variables are presented in Reference 2.

^cThese factors represent total hydrocarbons. Nonmethane hydrocarbons are estimated to make up to 5 to 10 percent of these totals, on the average.

^dBased on an assumed sulfur content of pipeline gas of 2000 gr/10⁶ scf (4600 g/Nm³). If pipeline quality natural gas is not fired, a material balance should be performed to determine SO₂ emissions based on the actual sulfur content.

^eNot available from existing data.

^fThese factors are calculated from the above factors for reciprocating engines assuming a heating value of 1050 Btu/scf (9350 kcal/Nm³) for natural gas and an average fuel consumption of 7500 Btu/hp-hr (2530 kcal/kW-hr).

^gThese factors are calculated from the above factors for gas turbines assuming a heating value of 1,050 Btu/scf (9,350 kcal/Nm³) of natural gas and an average fuel consumption of 10,000 Btu/hp-hr (3,380 kcal/kW-hr).

References for Section 3.3.2

1. Standard Support Document and Environmental Impact Statement - Stationary Reciprocating Internal Combustion Engines. Aerotherm/Acurex Corp., Mountain View, Calif. Prepared for Environmental Protection Agency, Research Triangle Park, N.C. under Contract No. 68-02-1318, Task Order No. 7, November 1974.
2. Urban, C.M. and K.J. Springer. Study of Exhaust Emissions from Natural Gas Pipeline Compressor Engines. Southwest Research Institute, San Antonio, Texas. Prepared for American Gas Association, Arlington, Va. February 1975.
3. Dietzmann, H.E. and K.J. Springer. Exhaust Emissions from Piston and Gas Turbine Engines Used in Natural Gas Transmission. Southwest Research Institute, San Antonio, Texas. Prepared for American Gas Association, Arlington, Va. January 1974.

TABLE 3.2-1 UNCONTROLLED EMISSION FACTORS FOR 2-STROKE LEAN-BURN ENGINES^a
(SCC 2-02-002-52)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Criteria Pollutants and Greenhouse Gases		
NO _x ^c 90 - 105% Load	3.17 E+00	A
NO _x ^c <90% Load	1.94 E+00	A
CO ^c 90 - 105% Load	3.86 E-01	A
CO ^c <90% Load	3.53 E-01	A
CO ₂ ^d	1.10 E+02	A
SO ₂ ^e	5.88 E-04	A
TOC ^f	1.64 E+00	A
Methane ^g	1.45 E+00	C
VOC ^h	1.20 E-01	C
PM10 (filterable) ⁱ	3.84 E-02	C
PM2.5 (filterable) ⁱ	3.84 E-02	C
PM Condensable ^j	9.91 E-03	E
Trace Organic Compounds		
1,1,2,2-Tetrachloroethane ^k	6.63 E-05	C
1,1,2-Trichloroethane ^k	5.27 E-05	C
1,1-Dichloroethane	3.91 E-05	C
1,2,3-Trimethylbenzene	3.54 E-05	D
1,2,4-Trimethylbenzene	1.11 E-04	C
1,2-Dichloroethane	4.22 E-05	D
1,2-Dichloropropane	4.46 E-05	C
1,3,5-Trimethylbenzene	1.80 E-05	D
1,3-Butadiene ^k	8.20 E-04	D
1,3-Dichloropropene ^k	4.38 E-05	C
2,2,4-Trimethylpentane ^k	8.46 E-04	B
2-Methylnaphthalene ^k	2.14 E-05	C
Acenaphthene ^k	1.33 E-06	C



Federal Environment and Safety Codified Regulations

TITLE 40—Protection of Environment

PART 98—MANDATORY GREENHOUSE GAS REPORTING

SUBPART C—General Stationary Fuel Combustion Sources

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

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



Federal Environment and Safety Codified Regulations
TITLE 40—Protection of Environment
PART 98—MANDATORY GREENHOUSE GAS REPORTING
SUBPART C—General Stationary Fuel Combustion Sources

Table C-2 to Subpart C of Part 98 —Default CH₄ and N₂O Emission Factors for Various Types of Fuel

Fuel type	Default CH₄ emission factor (kg CH₄ /mmBtu)	Default N₂O emission factor (kg N₂O/mmBtu)
Coal and Coke (All fuel types in Table C-1)	1.1×10^{-02}	1.6×10^{-03}
Natural Gas	1.0×10^{-03}	1.0×10^{-04}
Petroleum Products (All fuel types in Table C-1)	3.0×10^{-03}	6.0×10^{-04}
Fuel Gas	3.0×10^{-03}	6.0×10^{-04}
Other Fuels—Solid	3.2×10^{-02}	4.2×10^{-03}
Blast Furnace Gas	2.2×10^{-05}	1.0×10^{-04}
Coke Oven Gas	4.8×10^{-04}	1.0×10^{-04}
Biomass Fuels—Solid (All fuel types in Table C-1, except wood and wood residuals)	3.2×10^{-02}	4.2×10^{-03}
Wood and wood residuals	7.2×10^{-03}	3.6×10^{-03}
Biomass Fuels—Gaseous (All fuel types in Table C-1)	3.2×10^{-03}	6.3×10^{-04}
Biomass Fuels—Liquid (All fuel types in Table C-1)	1.1×10^{-03}	1.1×10^{-04}

Note: Those employing this table are assumed to fall under the IPCC definitions of the “Energy Industry” or “Manufacturing Industries and Construction”. In all fuels except for coal the values for these two categories are identical. For coal combustion, those who fall within the IPCC “Energy Industry” category may employ a value of 1g of CH₄ /mmBtu.

[75 FR page 79154, Dec. 17, 2010; 78 FR page 71952, Nov. 29, 2013; 81 FR page 89252, Dec. 9, 2016]

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October 2000
RG-109 (Draft)

Air Permit Technical Guidance for Chemical Sources:

Flares and Vapor Oxidizers

printed on
recycled paper

Air Permits Division

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Waste Stream	Destruction/Removal Efficiency (DRE)		
VOC	98 percent (generic) 99 percent for compounds containing no more than 3 carbons that contain no elements other than carbon and hydrogen in addition to the following compounds: methanol, ethanol, propanol, ethylene oxide and propylene oxide		
H ₂ S	98 percent		
NH ₃	case by case		
CO	case by case		
Air Contaminants	Emission Factors		
thermal NO _x	steam-assist:	high Btu low Btu	0.0485 lb/MMBtu 0.068 lb/MMBtu
	other:	high Btu low Btu	0.138 lb/MMBtu 0.0641 lb/MMBtu
fuel NO _x	NO _x is 0.5 wt percent of inlet NH ₃ , other fuels case by case		
CO	steam-assist:	high Btu low Btu	0.3503 lb/MMBtu 0.3465 lb/MMBtu
	other:	high Btu low Btu	0.2755 lb/MMBtu 0.5496 lb/MMBtu
PM	none, required to be smokeless		
SO ₂	100 percent S in fuel to SO ₂		

*The only exception of this is if inorganics might be emitted from the flare. In the case of landfills, the AP-42 PM factor may be used. In other cases, the emissions should be based on the composition of the waste stream routed to the flare.



Protocol for Equipment Leak Emission Estimates

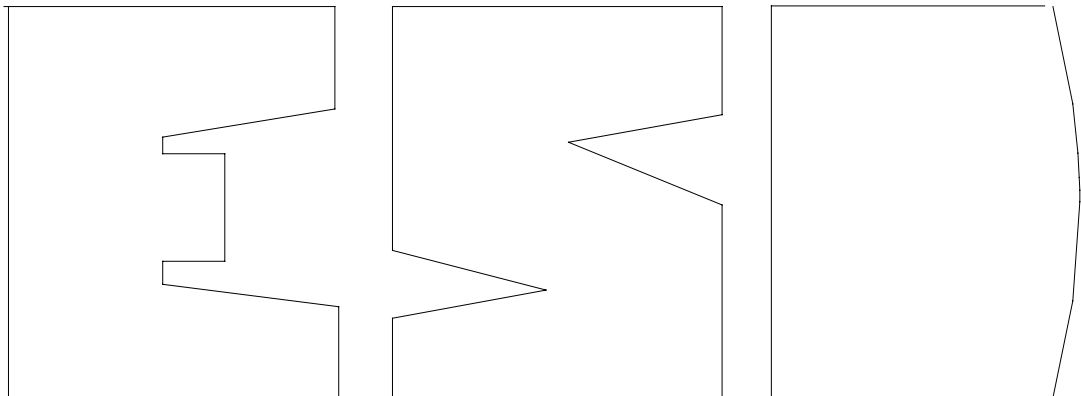
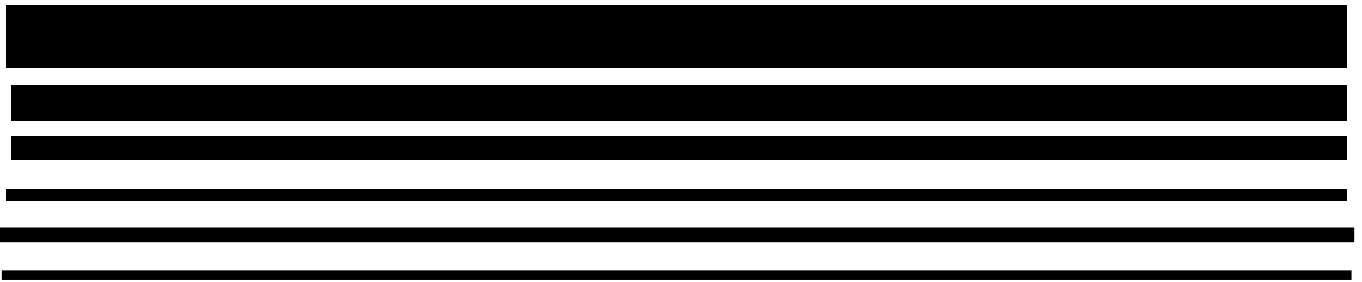


TABLE 2-4. OIL AND GAS PRODUCTION OPERATIONS AVERAGE EMISSION FACTORS (kg/hr/source)

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

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

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

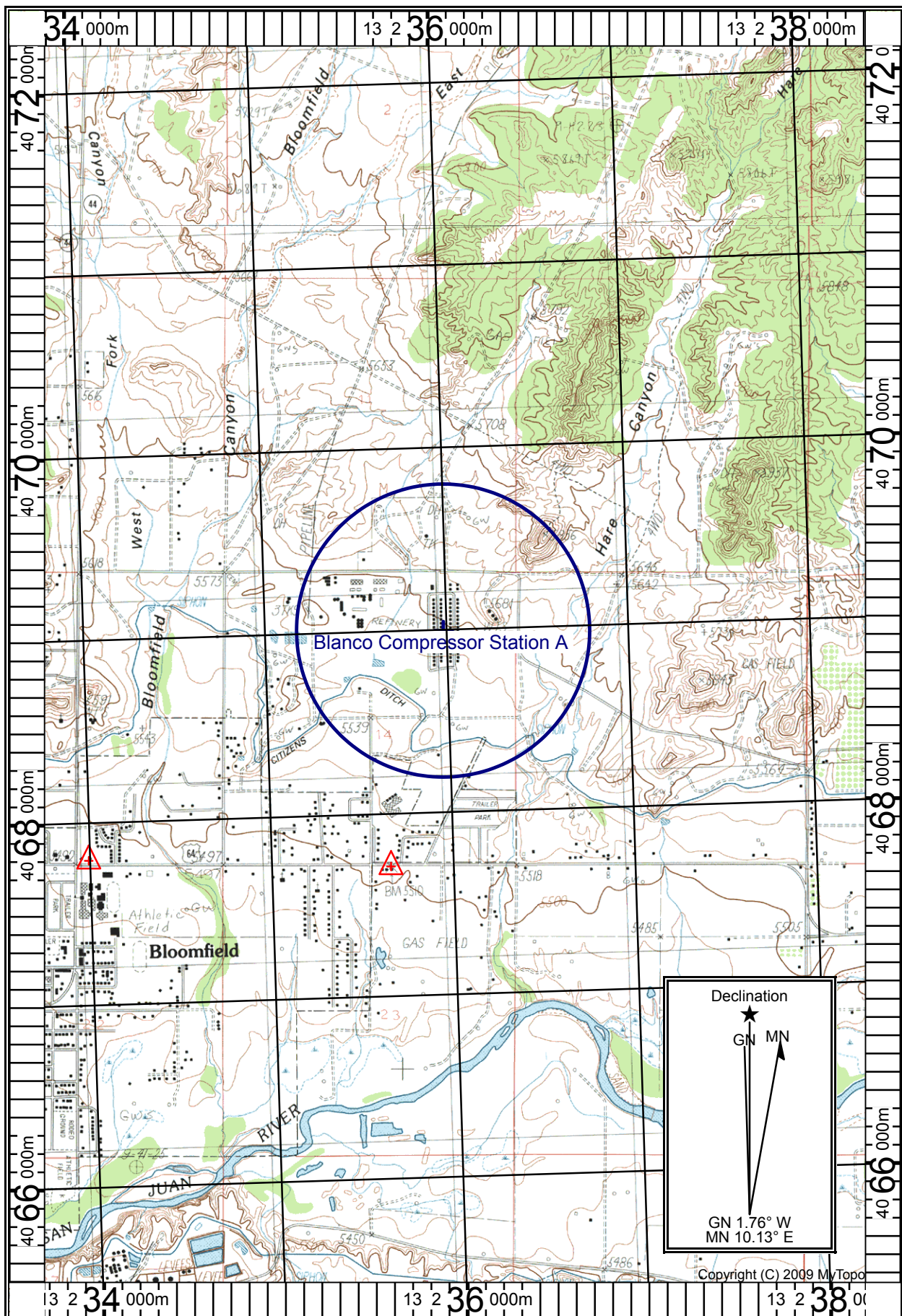
^cThe "other" equipment type was derived from compressors, diaphragms, drains, dump arms, hatches, instruments, meters, pressure relief valves, polished rods, relief valves, and vents. This "other" equipment type should be applied for any equipment type other than connectors, flanges, open-ended lines,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

Section 8

Map(s)

A map 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	



Map Name: BLOOMFIELD
Print Date: 02/06/19

Scale: 1 inch = 2,500 ft.
Map Center: 13 0236040 m E 4068810 m N

Horizontal Datum: WGS84

Section 9

Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)

(This proof is required by: 20.2.72.203.A.14 NMAC “Documentary Proof of applicant’s public notice”)

☐ **I have read the AQB “Guidelines for Public Notification for Air Quality Permit Applications”**

This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

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

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

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

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

1. ☐ A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
2. ☐ A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
3. ☐ A copy of the property tax record (20.2.72.203.B NMAC).
4. ☐ A sample of the letters sent to the owners of record.
5. ☐ A sample of the letters sent to counties, municipalities, and Indian tribes.
6. ☐ A sample of the public notice posted and a verification of the local postings.
7. ☐ A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
8. ☐ A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
9. ☐ A copy of the classified or legal ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
10. ☐ A copy of the display 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.

N/A—This is an application for Title V operating permit renewal; therefore, no public notice is required.

Section 10

Written Description of the Routine Operations of the Facility

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

Blanco A Compressor Station is a natural gas station that compresses natural gas and delivers the compressed gas to a pipeline for mainline transportation. This facility consists primarily of 14 natural gas fueled Cooper-Bessemer GMV-10TF compressor engines, site rated at 943 hp. The facility is currently designed to compress and transport approximately 1,280 MMscf/day of pipeline quality natural gas. An emergency flare (unit FL-01) shared with Enterprise Field Services, LLC Blanco C&D Compressor Station is used to combust scrubber blowdown gas (PURGE-01), which is considered an insignificant activity.

Startup, shutdown, and routine maintenance (unit SSM/M) emissions result from compressor and facility blowdowns. Insignificant activities include fugitive emissions (unit F-001), scrubber blowdown emissions (unit PURGE-01), storage tanks, and small heaters used for space heat.

Section 11

Source Determination

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

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

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

A. Identify the emission sources evaluated in this section: Please refer to Table 2-A

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

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

☒ **Yes** ☐ **No**

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

☒ **Yes** ☐ **No**

Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source.

☒ **Yes** ☐ **No**

C. Make a determination:

☒ The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "**YES**" boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes "**NO**" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.

☐ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

NOTE: EPA has used the definition of control established by the Securities and Exchange Commission (SEC). The SEC defines control as “the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a person (or organization or association) whether through ownership of voting shares, contract, or otherwise.” The possession of the power to direct the management and policies of an organization” can only be determined through a detailed review of business agreements and all relevant facts. If there is no common owner, control is based on agreements (such as contracts and lease information).

In this case Blanco C&D, Blanco A, and San Juan Basin Gas Plant, constitute a single source as control is established by federally enforceable New Source Review Permit No. 0613-M10R1 issued jointly to Enterprise Products Operating/Enterprise Field Services, El Paso Natural Gas, and ConocoPhillips. At this facility control is held in common by all three companies and any modification to the facility or application for revision of the NSR permit must be agreed to by all three parties. Therefore each of the three parties has an equal but minority stake in control of the facility.

Section 12

Section 12.A

PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

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

A. This facility is:

- ☐ a minor PSD source before and after this modification (if so, delete C and D below).
- ☐ a major PSD source before this modification. This modification will make this a PSD minor source.
- ☐ an existing PSD Major Source that has never had a major modification requiring a BACT analysis.
- ☐ an existing PSD Major Source that has had a major modification requiring a BACT analysis
- ☐ a new PSD Major Source after this modification.

B. This facility **[is or is not]** one of the listed 20.2.74.501 Table I – PSD Source Categories. The “project” emissions for this modification are **[significant or not significant]**. **[Discuss why.]** The “project” emissions listed below **[do or do not]** only result from changes described in this permit application, thus no emissions from other **[revisions or modifications, past or future]** to this facility. Also, specifically discuss whether this project results in “de-bottlenecking”, or other associated emissions resulting in higher emissions. The project emissions (before netting) for this project are as follows [see Table 2 in 20.2.74.502 NMAC for a complete list of significance levels]:

- a. NOx: **XX.X** TPY
- b. CO: **XX.X** TPY
- c. VOC: **XX.X** TPY
- d. SOx: **XX.X** TPY
- e. TSP (PM): **XX.X** TPY
- f. PM10: **XX.X** TPY
- g. PM2.5: **XX.X** TPY
- h. Fluorides: **XX.X** TPY
- i. Lead: **XX.X** TPY
- j. Sulfur compounds (listed in Table 2): **XX.X** TPY
- k. GHG: **XX.X** TPY

C. Netting **[is required, and analysis is attached to this document.] OR [is not required (project is not significant)] OR [Applicant is submitting a PSD Major Modification and chooses not to net.]**

D. BACT is **[not required for this modification, as this application is a minor modification.] OR [required, as this application is a major modification. List pollutants subject to BACT review and provide a full top down BACT determination.]**

E. If this is an existing PSD major source, or any facility with emissions greater than 250 TPY (or 100 TPY for 20.2.74.501 Table 1 – PSD Source Categories), determine whether any permit modifications are related, or could be considered a single project with this action, and provide an explanation for your determination whether a PSD modification is triggered.

N/A – This is an application for a Title V renewal under 20.2.70 NMAC and no modifications are being requested; therefore, a PSD applicability determination is not required.

Section 13

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 RELEVANT 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:

<u>STATE REGU- LATIONS</u> CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. This facility meets maximum allowable concentrations of TSP, SO ₂ , H ₂ S, CO, NO _x , and CO under this regulation.
20.2.7 NMAC	Excess Emissions	Yes	Facility	This regulation establishes requirements for the facility if operations at the facility result in any excess emissions. The owner or operator will operate the source at the facility having an excess emission, to the extent practicable, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. The facility will also notify the NMED of any excess emission per 20.2.7.110 NMAC. All Title V major sources are subject to Air Quality Control Regulations, as defined in 20.2.7 NMAC, and are thus subject to the requirements of this regulation.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	Blanco Compressor Station A does not have existing gas burning equipment with a heat input of greater than 1,000,000 million British Thermal Units per year per unit. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.33.108 NMAC.
20.2.34 NMAC	Oil Burning Equipment: NO ₂	No	N/A	This facility does not have oil burning equipment with a heat input of greater than 1,000,000 million British Thermal Units per year per unit. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.34.108 NMAC.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This regulation establishes sulfur emission standards for natural gas processing plants. The facility is not a “natural gas processing plant” as defined in 20.2.35.7 NMAC. The facility is not subject to this regulation.
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	No	N/A	The purpose of this regulation is to minimize emissions from petroleum or natural gas processing facilities. Blanco Compressor Station A is not a “petroleum processing facility” as defined in the 20.2.37.7 NMAC.
20.2.38 NMAC	Hydrocarbon Storage Facility	No	N/A	Blanco A Compressor Station is not a petroleum processing or production facility and does not have a tank battery as defined in 20.2.38.7 NMAC. This regulation is not applicable.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This regulation establishes sulfur emission standards for sulfur recovery plants which are not part of petroleum or natural gas processing facilities. This regulation does not apply to the facility because Blanco A does not have a sulfur recovery plant.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	A-01 through A-14	This regulation establishes controls on smoke and visible emissions from certain sources, including stationary combustion equipment. The facility's engines (A-01 through A-14) are stationary combustion equipment and comply with this regulation by the sole use of pipeline quality natural gas as fuel.
20.2.70 NMAC	Operating Permits	Yes	Facility	This regulation establishes requirements for obtaining an operating permit. The source is major for NO _x , CO, Formaldehyde, and Total HAPs.
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This regulation establishes a schedule of operating permit emission fees. This facility is subject to 20.2.70 NMAC and is in turn subject to 20.2.71 NMAC.
20.2.72 NMAC	Construction Permits	Yes	Facility	This regulation establishes the requirements for obtaining a construction permit. The facility is a stationary source that has potential emission rates greater than 10 pounds per hour and 25 tons per year of any regulated air contaminant for which there is a National or New Mexico Air Quality Standard. This regulation applies and this facility complies with NSR Permit number 613-M10R1.

<u>STATE REGU- LATIONS</u> CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	This regulation establishes emission inventory requirements. The facility meets the applicability requirements of 20.2.73.300 NMAC. The facility will meet all applicable reporting requirements under 20.2.73.300.B.1 NMAC.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	Facility	This regulation establishes requirements for obtaining a prevention of significant deterioration permit. The facility is an existing PSD major source for NO _x . The facility has not undergone a major modification and therefore does not currently require a PSD permit.
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	This regulation establishes a schedule of operating permit emission fees. The facility is subject to 20.2.72 NMAC and is therefore subject to requirements of this regulation.
20.2.77 NMAC	New Source Performance	No	Units subject to 40 CFR 60	This regulation establishes state authority to implement new source performance standards (NSPS) for stationary sources. This regulation is not applicable as there are no NSPS-affected sources at the facility.
20.2.78 NMAC	Emission Standards for HAPS	No	Units Subject to 40 CFR 61	This regulation establishes state authority to implement emission standards for hazardous air pollutants subject to 40 CFR Part 61. This facility could emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61, as amended through January 15, 2017. In the case of asbestos demolition, one NESHAP would apply.
20.2.79 NMAC	Permits – Nonattainment Areas	No	Facility	This regulation establishes the requirements for obtaining a nonattainment area permit. The facility is not located in a non-attainment area and therefore is not subject to this regulation
20.2.80 NMAC	Stack Heights	No	Facility	This regulation does not apply as the source was in existence prior to December 31, 1970. [20.2.80.110.A]
20.2.82 NMAC	MACT Standards for source categories of HAPS	No	Units Subject to 40 CFR 63	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63. This regulation is not applicable as there are no MACT-affected sources at the facility.

Table for Applicable FEDERAL REGULATIONS:

<u>FEDERAL REGU- LATIONS</u> CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 50	NAAQS	Yes	Facility	This regulation defines national ambient air quality standards. The facility meets all applicable national ambient air quality standards for NO _x , CO, SO ₂ , H ₂ S, PM ₁₀ , and PM _{2.5} under this regulation.
NSPS 40 CFR 60, Subpart A	General Provisions	No	Units subject to 40 CFR 60	This regulation defines general provisions for relevant standards that have been set under this part. No NSPS subparts apply therefore this regulation does not apply.
NSPS 40 CFR 60.40a, Subpart Da	Subpart Da, Performance Standards for Electric Utility Steam Generating Units	No	N/A	This regulation establishes standards of performance for electric utility steam generating units. This regulation does not apply because the facility does not operate any electric utility steam generating units.

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
NSPS 40 CFR60.40b Subpart Db	Electric Utility Steam Generating Units	No	N/A	This regulation establishes standards of performance for industrial-commercial-institutional steam generating units. This regulation does not apply because the facility does not operate any industrial-commercial-institutional steam-generating unit.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	This regulation establishes standards of performance for small industrial-commercial-institutional steam generating units. This regulation does not apply because the facility does not operate any industrial-commercial-institutional steam generating units.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	No	N/A	This regulation establishes performance standards for storage vessels for petroleum liquids with a storage capacity greater than 40,000 gallons for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. The capacities of the tanks at the facility are less than 40,000 gallons and are not subject to this regulation. [60.110a(a)]
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	No	N/A	This regulation establishes performance standards for volatile organic liquid storage vessels (including petroleum liquid storage vessels) for which construction, reconstruction, or modification commenced after July 23, 1984. This facility does not have storage vessels with a capacity greater than or equal to 75 cubic meters (m³) that are used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification commenced after July 23, 1984. Blanco A is not subject to this regulation. [60.110b(a)]
NSPS 40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No	N/A	This subpart establishes emission standards and monitoring requirements for the control of emissions from stationary combustion turbines that commenced construction, modification, or reconstruction after October 3, 1977. This facility does not contain any stationary gas turbines; therefore, this regulation does not apply.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from Onshore Gas Plants	No	N/A	This regulation defines standards of performance for equipment leaks of VOC emissions from onshore natural gas processing plants for which construction, reconstruction, or modification commenced after January 20, 1984, and on or before August 23, 2011. This facility is not a natural gas processing plant; therefore, this regulation does not apply.

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions	No	N/A	This regulation establishes standards of performance for SO ₂ emissions from onshore natural gas processing for which construction, reconstruction, or modification of the amine sweetening unit commenced after January 20, 1984 and on or before August 23, 2011. This regulation does not apply as the facility is not a natural gas processing plant.
NSPS 40 CFR Part 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	No	N/A	All equipment at the facility was installed prior to August 23, 2011; therefore, no units are subject to this regulation.
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	No	N/A	The facility was constructed prior to the applicability date of the regulation and all equipment at the facility was installed prior to September 18, 2015; therefore, no units are subject to this regulation.
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary compression ignition internal combustion engines. The facility does not contain any stationary compression ignition internal combustion engines; therefore, this regulation does not apply.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary spark ignition combustion engines. This regulation is not applicable as all RICE at Blanco Compressor Station A were constructed prior to June 12, 2006, the applicability date of this regulation.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	This regulation establishes standards of performance for greenhouse gas emissions for electric generating units. This regulation is not applicable because the facility does not contain any electric generating units.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	This regulation establishes standards of performance for greenhouse gas emissions and compliance times for electric utility generating units. This regulation is not applicable because the facility does not contain any electric generating units.

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	This regulation establishes standards of performance for municipal solid waste landfills. This regulation is not applicable because the facility is not a landfill.
NESHAP 40 CFR 61 Subpart A	General Provisions	No (potentially)	N/A (potentially)	NSPS 40 CFR 61 does not apply to the facility because the facility does not emit or have the triggering substances on site and/or the facility is not involved in the triggering activity. The facility is not subject to this regulation. None of the subparts of Part 61 apply to the facility.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for Mercury	No	N/A	This regulation establishes a national emission standard for mercury. The facility does not have stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, or incinerate or dry wastewater treatment plant sludge [40 CFR Part 61.50]. The facility is not subject to this regulation.
NESHAP 40 CFR 61 Subpart M	National Emission Standards for Asbestos	N/A (potentially)	N/A (potentially)	Although this standard does not apply to this facility under routine operating conditions, in the case of asbestos demolition, Subpart M would apply.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	No	N/A	This regulation establishes national emission standards for equipment leaks (fugitive emission sources). The facility does not have equipment that operates in volatile hazardous air pollutant (VHAP) service [40 CFR Part 61.240]. The regulated activities subject to this regulation do not take place at this facility. The facility is not subject to this regulation.
MACT 40 CFR 63, Subpart A	General Provisions	No	Units Subject to 40 CFR 63	This regulation defines general provisions for relevant standards that have been set under this part. Subpart ZZZZ does not apply to RICE units A-01 to A-14 because the engines are existing lean burn engines that were installed at a major source of HAPs prior to December 19, 2002 in accordance with 40 CFR 63.6590(a)(1)(i)
MACT 40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	No	N/A	This regulation establishes national emission standards for hazardous air pollutants from oil and natural gas production facilities. This facility does not have any affected sources as specified under this subpart and is therefore not subject to the requirements of this subpart. [63.760(d)]
MACT 40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities	No	N/A	This regulation establishes national emission standards for hazardous air pollutants from natural gas transmission and storage facilities. This facility does not have an affected source listed under 63.1270(b) and is therefore not subject to the requirements of this subpart. [63.1270(c)]
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	No	N/A	This regulation establishes the national emission standards for hazardous air pollutant for major industrial, commercial, and institutional boilers & process heaters. The facility does not have a commercial and institutional boiler or process heater; therefore, this regulation does not apply.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No	N/A	This regulation establishes the national emission standards for hazardous air pollutants coal and oil fire electric utility steam generating units. This regulation does not apply because the facility does not have steam-generating units.

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	No	A-01 through A-14	Per 40 CFR 63.6590(a)(1)(i), the engines are existing stationary RICE as they were installed at a major source of HAPs prior to December 19, 2002. Per 40 CFR 63.6590(b)(3), existing lean burn stationary RICE at a major HAP source are not subject to the requirements of 40 CFR 63, Subparts A and ZZZZ.
40 CFR 64	Compliance Assurance Monitoring	N/A	No	This regulation defines compliance assurance monitoring. This facility has no units meeting the criteria of this part; specifically no emission units are controlled major sources. Although Blanco Compressor Station A is a Title V major source with a part 70 permit, none of the units at this facility use a control device (as defined by the CAM rule) to achieve compliance with emission limits.
40 CFR 68	Chemical Accident Prevention	N/A	No	Facility is regulated under DOT Office of Pipeline Safety Regulations (49 CFR 192, 193 and 195); therefore, it is not subject to this regulation. This regulation arises from section 112(r) of the Clean Air Act and establishes thresholds based on inventoried quantities of specific substances in process. As established at 40 CFR 68.3, the term “stationary source” does not apply to the transportation of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR parts 192, 193, or 195 (DOT Office of Pipeline Safety Regulations).
Title IV – Acid Rain 40 CFR 72	Acid Rain	No	N/A	This part establishes the acid rain program. This part does not apply because the facility is not covered by this regulation. [40 CFR Part 72.6]
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions	No	N/A	This regulation establishes sulfur dioxide allowance emissions for certain types of facilities. This part does not apply because the facility is not the type covered by this regulation [40 CFR Part 73.2].
Title IV- Acid Rain 40 CFR 75	Continuous Emissions Monitoring	No	N/A	This facility does not generate commercial electric power or electric power for sale, therefore this regulation does not apply
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program	No	N/A	This regulation establishes an acid rain nitrogen oxides emission reduction program. This regulation applies to each coal-fired utility unit that is subject to an acid rain emissions limitation or reduction requirement for SO ₂ . This part does not apply because the facility does not operate any coal-fired units [40 CFR Part 76.1].
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No	N/A	EPNG owns appliances containing CFCs and is therefore subject to this requirement. However, this requirement imposes no obligations on the facility beyond those imposed on any individual or corporate owner of such appliances, and is mentioned here only in the interest of being thorough. EPNG uses only certified technicians for the maintenance, service, repair and disposal of appliances and maintains the appropriate records for this requirement.
CAA Section 112(r)	Hazardous Air Pollutants Prevention of Accidental Releases	No	N/A	As established at 40 CFR 68.3, the term “stationary source” does not apply to the transportation of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR parts 192, 193, or 195 (DOT Office of Pipeline Safety Regulations).

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

Construction Scenarios: When a permit is modified authorizing new construction to an existing facility, NMED includes a condition to clearly address which permit condition(s) (from the previous permit and the new permit) govern during the interval between the date of issuance of the modification permit and the completion of construction of the modification(s). There are many possible variables that need to be addressed such as: Is simultaneous operation of the old and new units permitted and, if so for example, for how long and under what restraints? In general, these types of requirements will be addressed in Section A100 of the permit, but additional requirements may be added elsewhere. Look in A100 of our NSR and/or TV permit template for sample language dealing with these requirements. Find these permit templates at: https://www.env.nm.gov/aqb/permit/aqb_pol.html. 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 term “alternative operating scenario” is not defined by regulation. EPNG understands this term to apply to one or more sources that may routinely operate with alternative fuels or raw materials and/or on a significantly different schedule that may potentially affect emissions. Based on this understanding, Blanco A does not have any alternative operating scenarios.

Units at the facility may be shut down from time to time due to factors including but not limited to market demand, maintenance, malfunctions, and emergency shutdowns. Operating in alternative modes and temporary shutdowns are not alternative operating scenarios as EPNG understands the term.

Section 16

Air Dispersion Modeling

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

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). 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.	X
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	

Check each box that applies:

- ☐ 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.

Dispersion modeling is not required as part of this Title V operating permit renewal application. A modeled demonstration of compliance with National Ambient Air Quality Standards (NAAQS) and New Mexico Ambient Air Quality Standards (NMAAQs) was submitted with the application for NSR Permit 613-M5, and the permit was issued on the basis of that demonstration.

Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

Unit No.	Test Description	Test Date
A-01	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	3/28/17; 579 hours in 2018 (not tested)
A-02	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	14.75 hours in 2017 (not tested); 4.25 hours in 2018 (not tested)
A-03	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	3/28/2017; 4/3/2018
A-04	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	2.5 hours in 2017 (not tested); 2 hours in 2018 (not tested)
A-05	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	5 hours in 2017 (not tested); 9.5 hours in 2018 (not tested)
A-06	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	3/29/2017; 4/3/2018
A-07	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	3/29/2017; 4/3/2018
A-08	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	1.25 hours in 2017 (not tested); 1.75 hours in 2018 (not tested)
A-09	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	183.5 hours in 2017 (not tested); 866.5 hours in 2018 (not tested)
A-10	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	1.75 hours in 2017 (not tested); 6.5 hours in 2018 (not tested)
A-11	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	3/30/2017; 4/3/2018
A-12	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	2.25 hours in 2017 (not tested); 4/3/2018
A-13	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	5/31/2017; 10/23/2018
A-14	Testing in accordance with the Conditions of A314 in Permit P048-R3 (unless Condition B108D is met).	1.25 hours in 2017 (not tested); tested 4/3/2018

Section 19

Requirements for Title V Program

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

Who Must Use this Attachment:

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

Blanco Compressor Station A is a major source as defined in 20.2.70 NMAC.

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

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

Based on information and belief formed after reasonable inquiry, EPNG states that the facility does not meet the applicability requirements of 40 CFR 64.2. Specifically, no sources at the facility are controlled major sources of regulated pollutants, and enhanced monitoring requirements are not applicable to this facility at this time. EPNG will submit the necessary statement should the facility or requirements change such that this requirement becomes applicable.

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

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

As described here and based on information and belief formed after reasonable inquiry, EPNG believes that Blanco Compressor Station A is in compliance with each applicable requirement identified in Section 19.2 and as discussed here. In the event that EPNG should discover new information affecting the compliance status of the facility, EPNG will make appropriate notifications and/or take corrective actions.

Pursuant to Condition 6.1 of Permit P048-R3, EPNG has certified to compliance with the terms and conditions of that permit. The most recent such certification was submitted by the January 30th deadline. Since that time, EPNG has continued to be in compliance with applicable requirements.

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

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

As described Section 19.2 and based on information and belief formed after reasonable inquiry, EPNG states that Blanco Compressor Station A will continue to be operated in compliance with applicable requirements for which it is in compliance as of the date of submittal of this application.

In addition, EPNG will meet additional applicable requirements that become effective during the permit term in a timely manner or on such a time schedule as expressly required by the applicable requirement. In the event that EPNG should discover new information affecting the compliance status of the facility, EPNG will make appropriate notifications and/or take corrective actions as appropriate.

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

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

Condition A308 of Operating Permit P048-R3 specifies that EPNG must submit compliance certification reports to the New Mexico Environment Department (NMED) Air Quality Bureau (AQB) and to the EPA by no later than January 30th of each year.

19.5 - Stratospheric Ozone and Climate Protection

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

1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances? ☒ **Yes** ☐ **No**
2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? ☐ **Yes** ☒ **No**
(If the answer is yes, describe the type of equipment and how many units are at the facility.)
3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? ☐ **Yes** ☒ **No**
4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.)

Based on information and belief formed after reasonable inquiry, El Paso Natural Gas Company states that Title VI, Section 608 (National Recycling and Emissions Reduction Program) of the Clean Air Act may apply to this facility, as EPNG may own CFC-containing refrigeration equipment meeting the criteria of this Section, specifically, 40 CFR 82, Subpart F, which applies to owners of CFC-containing appliances (40 CFR 82.150 (b) and 40 CFR 82.152). EPNG may own appliances affected by this subpart, and abides by this regulation. EPNG is in compliance with the requirements of this Section.

EPNG does not service motor vehicle air conditioners at this facility and therefore Section 609 does not apply.

Blanco Compressor Station A will continue to be operated in compliance with the requirements of Title VI, Section 608 of the Clean Air Act as they apply to this facility.

19.6 - Compliance Plan and Schedule

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

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

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

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

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

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

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

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

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

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

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

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

Based on information and belief formed after reasonable inquiry and as described in Section 19.2, and with this filing, EPNG states that Blanco A is in compliance with applicable requirements. No compliance plan, compliance schedule, or compliance reports are required.

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

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

Based on information and belief formed after reasonable inquiry, El Paso Natural Gas Company states that Blanco Compressor Station A is not subject to 40 CFR 68, Chemical Accident Prevention Provisions.

As per 40 CFR 68.3 (definitions), the term “stationary source” does not apply to transportation of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR parts 192, 193 or 195 (DOT Office of Pipeline Safety Regulations).

EPNG’s Blanco Compressor Station A is regulated under DOT Office of Pipeline Safety Regulations (49 CFR 192, 193 and 195). Therefore, it is not subject to 112(r).

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

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

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

Mesa Verde National Park (39 miles); Navajo Nation (15 miles); Jicarilla Apache Reservation (35 miles); Colorado (20 miles)

19.9 - Responsible Official

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

- Responsible Official: Donald W. Perkins
 - o Title: Director, Operations
 - o Email: Don_Perkins@kindermorgan.com
 - o Phone: 970-208-1268
 - o Address: 2527 Foresight Circle, Grand Junction, CO 81505
- Alternative Responsible Official: Joe McLaughlin
 - o Title: Vice President, Operations
 - o Phone: 713-369-9847
 - o Email: Joe_McLaughlin@kindermorgan.com
 - o Address: 1001 Louisiana St., Suite 1000, Houston, TX, 77022

Section 20

Other Relevant Information

Other relevant information. 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.

EPNG would like to identify the North American Energy Standards Board (NAESB) Gas Day as the basis for records tracking at Blanco Compressor Station A and other facilities.

The United States uses six different standardized time zones from east to west; the energy industry uses a seventh time zone developed by the NAESB. This Board serves as an industry platform for the development and promotion of industry practices and standards that lead to the seamless marketing of wholesale and retail natural gas and electricity. Since 2003, the NAESB Gas Day has been recognized by its customers, the business community, participants, and federal and state regulatory entities. As such, a NAESB Gas Day is a 24-hour period derived from a uniform time zone that occurs simultaneously nationwide and is the basis of EPNG's COMET data acquisition system "day" data. Unit information defined and stored according to the NAESB Gas Day includes monitored gas flows or volumes, hours of operation, maintenance and repair activities, and routine emissions.

Data obtained from outside agencies (including test reports and summaries) or submitted pursuant to 20.2.7 NMAC reporting requirements is based on the "day" as defined by the local time zone.

Section 22: Certification

Company Name: El Paso Natural Gas Company, L.L.C.

I, Donald W. Perkins, 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 12 day of February, 2019, upon my oath or affirmation, before a notary of the State of

Utah

[Signature]
*Signature

2/12/19
Date

Donald W. Perkins
Printed Name

Director, Operations
Title

Scribed and sworn before me on this 12 day of February, 2019.

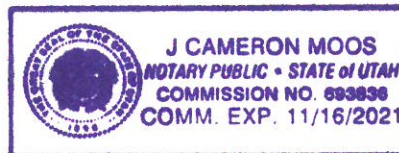
My authorization as a notary of the State of Utah expires on the

16 day of November, 2021.

J. Cameron Moos
Notary's Signature

2/12/19
Date

J. Cameron Moos
Notary's Printed Name



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