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).

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

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

ONEOK, Inc. is submitting this application for an NSR permit modification pursuant to 20.2.72. The Red Raider Compressor Station (Facility) is located in Eddy County and currently is permitted under NSR 9897-M1 and Title V P-304. This facility is a compressor station. With this application, ONEOK, Inc. seeks add (Source ID's ENG-7 and ENG-8) which are the updated Generation 2 Caterpillar 3616 A4 units, remove the Caterpillar 3612A4s (Source ID's ENG-7 and ENG-8), add a generator engine (Source ID GEN-1), add a second enclosed combustion device (Source ID ECD-2) to control the TEG glycol dehydrator streams, add compressor fugitive components (Source IDs COMP-1 FUG, COMP-2 FUG, COMP-3 FUG, COMP-4 FUG, COMP-5 FUG, COMP-6 FUG, COMP-7 FUG, COMP-8 FUG), and update Facility emissions associated with recent extended gas and liquid analyses. The Facility will remain subject to Title V requirements and will require an update to add these sources. The Facility will not exceed PSD thresholds with these proposed NSR permit modifications.

The Facility will consist of the following equipment and operations:

- Eight (8) Compressor Engines (Source IDs ENG-1 through ENG-8)
- One (1) Generator Engine (Source ID GEN-1)
- One (1) Dehydrator Unit (Source ID DEHY-1)
- One (1) Glycol Reboiler (Source ID RBL-1)
- One (1) 750-barrel (bbl) Gun Barrel Separator (Source ID TK-407)
- Two (2) 1,000-bbl Condensate Storage Tanks (Source IDs TK-406A, TK-406B)
- One (1) 1,000 bbl Produced Water Storage Tank (Source ID TK-406C)
- Truck Loading (Source ID LOAD-1)
- One (1) electric vapor recovery unit
- Two (2) enclosed combustion devices (Source IDs ECD-1, ECD-2)
- Two (2) 210-bbl Oil Tanks (Source IDs TK-405, TK-406)
- One (1) 210-bbl Methanol Tank (Source ID TK-408)
- One (1) 210-bbl Coolant Tank (Source ID TK-409)
- One (1) 1,000-gallon (gal) TEG Tank (Source ID TK-TEG)
- Four (4) 1,000-gallon (gal) Oil Tanks (Source IDs TK-OIL1, TK-OIL2, TK-OIL3, TK-OIL4)
- Four (4) 1,000-gallon (gal) Antifreeze Tanks (Source IDs TK-AF1, TK-AF2, TK-AF3, TK-AF4)
- Fugitive equipment components (Source IDs FUG, COMP-1 FUG, COMP-2 FUG, COMP-3 FUG, COMP-4 FUG, COMP-5 FUG, COMP-6 FUG, COMP-7 FUG, COMP-8 FUG)
- Unpaved Road Dust (Source ID HAUL)
- Startup, Shutdown & Maintenance (SSM) activities (Source ID SSM)
- Malfunction emissions (Source ID MALF)

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 has been included in this section.

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 has been included in this section.

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.

Waukesha 16V275GL Engines (Unit IDs: ENG-4, ENG-5)
NOX, CO, and VOC emission rates were calculated using manufacturer specifications. SO2 emissions are based on a conservative fuel sulfur content estimated of 2 gr S/100 scf and 100% conversion of elemental sulfur to SO2. Particulate (PM2.5, PM10, and PM) was calculated using EPA updated factors for NG (Roy Huntley EPA). HAP emissions were calculated using AP-42 Table 3.2-2. Greenhouse gas emissions are estimated using emission factors from 40 CFR 98 Subpart C Tables C-1 and C-2.

Caterpillar 3612A4 Engines (Unit IDs: ENG-1,2,3,6)
NOX, CO, and VOC emission rates were calculated using manufacturer specifications. SO2 emissions are based on a conservative fuel sulfur context estimated of 2 gr S/100 scf and 100% conversion of elemental sulfur to SO2. Particulate (PM2.5, PM10, and PM) was calculated using EPA updated factors for NG (Roy Huntley EPA). HAP emissions were calculated using AP-42 Table 3.2-2. Greenhouse gas emissions are estimated using emission factors from 40 CFR 98 Subpart C Tables C-1 and C-2.

Caterpillar 3616A4 Engines (Unit IDs: ENG-7, 8)
NOX, CO, and VOC emission rates were calculated using manufacturer specifications. SO2 emissions are based on a conservative fuel sulfur context estimated of 2 gr S/100 scf and 100% conversion of elemental sulfur to SO2. Particulate (PM2.5, PM10, and PM) was calculated using EPA updated factors for NG (Roy Huntley EPA). HAP emissions were calculated using AP-42 Table 3.2-2. Greenhouse gas emissions are estimated using emission factors from 40 CFR 98 Subpart C Tables C-1 and C-2.

Aggreko/Hyundai Generator (Unit ID: GEN-1)
NOX, CO, and VOC emission rates were calculated using manufacturer specifications. SO2 emissions are based on a conservative fuel sulfur context estimated of 2 gr S/100 scf and 100% conversion of elemental sulfur to SO2. Particulate (PM2.5, PM10, and PM) and HAP emissions were calculated using AP-42 Table 3.2-2. Greenhouse gas emissions are estimated using emission factors from 40 CFR 98 Subpart C Tables C-1 and C-2.

Glycol Dehydrator (Unit ID: DEHY-1)
Glycol dehydrator emissions were calculated using BR&E Promax and an extended gas analysis. Flash tank emissions are sent to an enclosed combustion device (ECD-2) with 98% DRE. The still column is sent to BTEX condenser , BTEX non-condensable is sent to ECD-2 with 98% DRE.

Gunbarrel Tank (Unit ID: TK-407)
Gunbarrel emissions were estimated using BR&E ProMax. Flash, working and standing emissions are controlled by a VRU with an assumed 5% downtime.

Storage Tanks (Unit IDs: TK-406A through TK-406C)
Condensate storage tanks (Unit IDs: TK-406A and TK-406B) and produced water tanks (Unit IDs: TK-406C) emissions were estimated using BR&E ProMax. Flash, working and standing emissions from these tanks are controlled by a VRU with an assumed 5% downtime. Downtime is sent to the ECD with 98% DRE.

Enclosed Combustor Devices (Unit IDs: ECD-1, ECD-2)
NOX and CO emissions were calculated using TNRCC RG-109. VOCs and HAPs emissions were estimated based on the gas analysis and with manufacturer specification of 98% combustion efficiency. Pilot SO2 emissions are based on a conservative fuel sulfur content estimated of 2 gr S/100 scf and 100% conversion of elemental sulfur to SO2. Process emissions were calculated assuming 98% combustion efficiency. Greenhouse gas emissions are estimated using emission factors from 40 CFR Part 98 Subpart C Table C-01 and C-02.

Fugitive Emissions (Unit IDs: FUG, COMP-1 FUG, COMP-2 FUG, COMP-3 FUG, COMP-4 FUG, COMP-5 FUG, COMP-6 FUG, COMP-7 FUG, COMP-8 FUG)
Fugitive emission calculations were completed using emission factors from Table 2-4 of EPA Protocol for Equipment Leak Emission Estimates, 1995, and weight percent of gas and liquid components from gas and liquid streams generated in a BR&E ProMax simulation. Subcomponent counts for each subcomponent are based on estimated average component counts for each piece of equipment.

Condensate Loading Emissions (Unit ID: LOAD-1)
ProMax was used to perform the loading emission for condensate.

Reboiler (Unit ID: RBL-1)
NOX, CO, VOCs and PM were estimated using AP-42 Table 1.4-1 & 1.4-2 with adjusted emission factor. HAPs were calculated using adjusted emission rates from AP-42 Table 1.4-3. SO2 emissions were calculated with a conservative assumption of 2 gr S/100 scf and 100% conversion of elemental sulfur to SO2. Greenhouse gas emissions are estimated using emission factors from 40 CFR Part 98 Subpart C Table C-01 and C-02.

Unpaved Haul Road (Unit ID: HAUL)
PM10 and PM2.5 emissions were estimated based on the condensate loadout design basis and using equations 1a & 2 from AP-42 Section 13.2.2. Emissions factors were used from AP-42 Table 13.2.2-2.

Exempt Storage Tanks:

Methanol Storage Tank (Unit ID: TK-408)
The 210 bbl Methanol Storage Tank (TK-408) is exempt pursuant to 20.2.72.202.B.(5) NMAC. Emissions were calculated using BR&E ProMax.

Coolant Tank (Unit ID TK-409)
The single 210-bbl Coolant Tank (TK-409) is exempt pursuant to 20.2.72.202.B.(2) NMAC.

TEG Storage Tank (Unit ID TK-TEG)
The single 1,000-gallon TEG Storage Tank (TK-TEG) is exempt pursuant to 20.2.72.202.B.(2) NMAC.

Lube Oil Storage Tanks (Unit IDs TK-OIL1, TK-OIL2, TK-OIL3, TK-OIL4)
The four (4) 1,000-gallon Lube Oil Storage Tanks (TK-OIL1, TK-OIL2, TK-OIL3, TK-OIL4) are exempt pursuant to 20.2.72.202.B.(2) NMAC.

Antifreeze Tanks (Unit IDs TK-AF1, TK-AF2, TK-AF3, TK-AF4)
The four (4) 1,000-gallon Antifreeze Tanks are exempt pursuant to 20.2.72.202.B.(2) NMAC.

Section 6.a

Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC) applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO_2), nitrous oxide (N_2O), methane (CH_4), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO_2e emissions from your facility.
2. GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO_2e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
4. Report GHG mass and GHG CO_2e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO2e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following ☐ 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 CO_2 over a specified time period.

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

Metric to Short Ton Conversion:

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 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)

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.

Documentation used to support calculation in this permit application

- Current version of AP-42 located at: http://www.epa.gov/ttn/chief/ap42/index.html. Specific sections used in this application:
  - Subsection 1.4 – Natural Gas External Combustion Sources-Natural Gas (Table 1.4-1, 1.4-2 & 1.4-3) **[Units ECD-1, ECD-2 and RBL-1]**
  - Subsection 3.2 – Natural Gas-Fired Reciprocating Engines (Table 3.2-2) **[Units ENG-1 through ENG-8]**
  - Subsection 13.2.2 – Unpaved Roads (Table 13.2.2-2) **[Unit HAUL]**
- Compressor Manufacturer Specifications **[Units ENG-1 through ENG-8]**
- Generator Manufacturer Specifications **[Unit GEN-1]**
- TCEQ TNRCC RG-109 Flare Guidance documentation **[Unit ECD-1, ECD-2]**
- Manley Gas Testing, Inc.'s Extended Gas analysis. [Unit **DEHY-1** and inlet gas analysis for ProMax input]
- 40 CFR Subpart C (Table C-1 and C-2) [**Units ENG-1 through ENG-8, RBL-1, ECD-1, and ECD-2**].

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	

A map is included in this section.

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.

Section 10

Written Description of the Routine Operations of the Facility

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

The Facility is a natural gas compressor station, the purpose of which is to compress natural gas along a pipeline to sales. Low pressure field gas is gathered from various wells in the area. The gas enters the Facility through an inlet separator, where entrained liquids are removed from the stream. Liquids removed from the inlet gas stream are routed to a 750-barrel (bbl) gun barrel separator (Source ID TK-407), where the condensate removed is routed to two (2) 1,000-bbl condensate tanks (Source IDs TK-406A & TK-406B). Produced water that separates from the condensate at the condensate storage tanks is transferred to a 1,000-bbl produced water tank (Source ID TK-406C). The gun barrel, condensate, and produced water tank emissions are captured by an electric vapor recovery unit (VRU), which routes the emissions back to the Facility's inlet. Liquids collected in the tanks are periodically transported off-site via truck (Source ID LOAD-1). Vapors from truck loading are vapor balanced back to the tanks and subsequently routed to the VRU. During VRU downtime, tank and loading vapors are routed to one (1) enclosed combustion device (Source ID ECD-1) for 98% combustion control. From the inlet separator, the gas is compressed by eight (8) natural gas-driven compressor engines (Unit ENG-1 through ENG-8).

The sweet gas is then routed to a glycol dehydration unit (Source ID DEHY-1), which removes water from the gas through contact with glycol. The rich glycol (water saturated) is routed to a flash tank, where flash-off vapors are recycled to the inlet suction for recompression. Subsequently, the rich glycol is routed to the reboiler (Source ID RBL-1), which heats the glycol and vaporizes water from the stream. The lean glycol is then recycled back to the dehydration unit. Still vent emissions are routed to a condenser, where condensable liquids are routed to the storage tanks and non-condensable vapors are routed to the enclosed combustion device (Source ID ECD-2) with 98% destruction efficiency. The dry gas is transported off-site via pipeline.

A generator is located on-site for electricity generation (GEN-1).

Additional sources of emissions include fugitive components (Source ID FUG, COMP-1 FUG, COMP-2 FUG, COMP-3 FUG, COMP-4 FUG, COMP-5 FUG, COMP-6 FUG, COMP-7 FUG, COMP-8 FUG), unpaved road dust (Source ID HAUL), miscellaneous storage tanks (Source IDs TK-405, TK-406, TK-408, TK-409, TK-OIL1, TK-OIL2, TK-OIL3, TK-OIL4, TK-TEG, TK-AF1, TK-AF2, TK-AF3, TK-AF4), maintenance operations (Source ID SSM), and malfunction emissions (Source ID MALF).

Section 11

Source Determination

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

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

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

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

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

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

☒ **Yes** ☐ **No**

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

☒ **Yes** ☐ **No**

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

☒ **Yes** ☐ **No**

C. Make a determination:

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

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

Section 12

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.**

N/A – This application is being submitted under 20.2.72 NMAC and is not applying for a significant permit revision under 20.2.74 NMAC.

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 RELEVENT TO YOUR FACILITY'S NOTICE OF INTENT OR PERMIT.

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

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

Table for State Regulations:

State Regulation 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	If subject, this would normally apply to the entire facility. 20.2.3 NMAC is a State Implementation Plan (SIP) approved regulation that limits the maximum allowable concentration of, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. Title V applications, see exemption at 20.2.3.9 NMAC The TSP NM ambient air quality standard was repealed by the EIB effective November 30, 2018.
20.2.7 NMAC	Excess Emissions	Yes	Facility	If subject, this would normally apply to the entire facility. If your entire facility or individual pieces of equipment are subject to emissions limits in a permit or numerical emissions standards in a federal or state regulation, this applies. This would not apply to Notices of Intent since these are not permits.
20.2.23 NMAC	Fugitive Dust Control	No	N/A	This regulation does not apply because this application is not for a Notice of Intent.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	This facility does not have gas burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit; therefore, this regulation does not apply.
20.2.34 NMAC	Oil Burning Equipment: NO_2	No	N/A	This facility does not have oil burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit; therefore, this unit does not apply.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This facility does not meet the definition of a natural gas processing plant; therefore, this regulation does not apply.
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	N/A	N/A	These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.
20.2.38 NMAC	Hydrocarbon Storage Facility	Yes	TK-406A & TK-406B	This storage tanks have a combined capacity greater than 65,000 gallons; therefore, this regulation applies.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This facility does not meet the definition of a sulfur recovery plant; therefore, this regulation does not apply.
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants	Yes	ENG-1 through ENG-8, ECD-1, ECD-2, SSM, DEHY-1, FUG, COMP 1-8 FUG, TK-406A - TK-406C, LOAD-1	This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NOx) for oil and gas production, processing, compression, and transmission sources. 20.2.50 NMAC Subparts below: Include the construction status of applicable units as “New”, “Existing”, “Relocation of Existing”, or “Reconstructed” as defined by this Part in your justification: Check the box for the Subparts that are applicable: ☒113 – Engines and Turbines: ENG-1 through ENG-8 are existing. GEN-1 is new and less than 1,000 hp. ☒114 – Compressor Seals: Reciprocating compressors for ENG-1 through ENG-8. ☒115 – Control Devices and Closed Vent Systems: ECD-1, ECD-2, VRU ☒116 – Equipment Leaks and Fugitive Emissions: FUG, COMP 1-8 FUG ☐ 117 – Natural Gas Well Liquid Unloading ☒ 118 – Glycol Dehydrators: DEHY-1 is controlled 98% by ECD-2.

State Regulation 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.)
				☐ 119 – Heaters: RBL-1 is <20 MMBtu/hr ☒ 120 – Hydrocarbon Liquid Transfers: LOAD-1 is existing and controlled with the use of vapor balance, the VRU, and the ECD. ☒121 – Pig Launching and Receiving ☐122 – Pneumatic Controllers and Pumps ☒ 123 – Storage Vessels: TK-406A, TK-406B, and TK-406C are existing with a PTE > 3tpy. ☐124 – Well Workovers ☐ 125 – Small Business Facilities ☐126 – Produced Water Management Unit ☐127 – Flowback Vessels and Preproduction Operations
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	ENG-1 through ENG-8, GEN-1 RBL-1, ECD-1, ECD-2	Engines, boilers, heaters, and flares are subject. ENG-1 through ENG-8, GEN-1, RBL- 1, ECD-1, and ECD-2 will be subject to this regulation.
20.2.70 NMAC	Operating Permits	Yes	Facility	The facility has the potential to emit more than 100 tpy of carbon monoxide; therefore, this regulation applies.
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This facility is subject to 20.2.70 NMAC; therefore, this regulation applies.
20.2.72 NMAC	Construction Permits	Yes	Facility	This facility is subject to 20.2.72 NMAC. TK-408 is exempt under 20.2.72.202(B)(5). TK-409, TK-OIL1, TK-OIL2, TK-OIL3, TK-OIL4, TK-TEG, TK-AF1, TK-AF2, TK-AF3, and TK-AF4 are exempt under 20.2.72.202(B)(2).
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 facility is not a PSD source; therefore, this regulation does not apply.
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	This facility is subject to 20.2.72 NMAC; therefore, this regulation applies.
20.2.77 NMAC	New Source Performance	Yes	FUG, ENG-1 through ENG-8, GEN-1, COMP 1-8 FUG	This regulation establishes state authority to implement new source performance standards (NSPS) for stationary sources, as amended through January 15, 2017. FUG applies as it is subject to NSPS OOOOb, and Units ENG-1 through ENG-8 and GEN-1 will be subject to JJJJ. The compressors associated with ENG-1 through ENG-8 (Source IDs COMP 1-8 FUG) are subject to OOOOb.
20.2.78 NMAC	Emission Standards for HAPS	No	N/A	This regulation establishes state authority to implement emission standards for hazardous air pollutants subject to 40 CFR Part 61. This facility does not emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61 and is therefore not subject to this regulation.

State Regulation 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.)
20.2.79 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	N/A	This regulation establishes requirements for the evaluation of stack heights and other dispersion techniques. This regulation does not apply, as all stacks at the facility will follow good engineering practice.
20.2.82 NMAC	MACT Standards for source categories of HAPS	Yes	DEHY-1, ENG-1 through ENG-8, GEN-1	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63.

Table for Applicable Federal Regulations (Note: This is not an exhaustive list):

Federal Regulation 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 NOx, CO, SO2, H2S, PM10, and PM2.5 under this regulation.
NSPS 40 CFR 60, Subpart A	General Provisions	Yes	ENG-1 through ENG-8, GEN-1, FUG, COMP 1-8 FUG	This regulation defines general provisions for relevant standards that have been set under this part. The facility is subject to this regulation because the following Subparts apply: - Unit FUG is subject to NSPS OOOOb when the rule is promulgated. Units ENG-1 through ENG-8 and GEN-1 are subject to JJJJ. The compressors associated with ENG-1 through ENG-8 (Source IDs COMP 1-8 FUG) are subject to OOOOb.
NSPS 40 CFR60.40a, Subpart Da	Subpart Da, Performance Standards for **Electric Utility Steam Generating Units**	No	N/A	This Facility does not operate any sources to which this regulation is applicable.
NSPS 40 CFR60.40b Subpart Db	**Electric Utility Steam Generating Units**	No	N/A	This Facility does not operate any sources to which this regulation is applicable.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	This Facility does not operate any sources to which this regulation is applicable.
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	TK-406A and TK-406B	Tanks TK-406A and TK-406B were constructed after July 23, 1984, therefore this rule does not apply.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for **Volatile Organic Liquid Storage Vessels** (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced **After** July 23, 1984	No	N/A	This facility storage vessels TK-406A, TK-406B, and TK-406C were constructed after July 23, 1984 but are not subject because they store "petroleum (other than crude oil) or condensate stored, processed, and/or treated prior to custody transfer" and have a combined capacity less than 420,000 gal (10,000 bbl) per §60.110b(d)(4). Storage vessels TK-405, TK-406, TK-408, TK-409, TK-OIL1, TK-OIL2, TK-OIL3, TK-OIL4, TK-TEG, TK-AF1, TK-AF2, TK-AF3, and TK-AF4 each have capacities less than 75 m^3.
NSPS 40 CFR 60, Subpart Kc	Standards of Performance for **Volatile Organic Liquid Storage Vessels** (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced **After** October 4, 2023	No	N/A	Storage vessels TK-406A, TK-406B, TK-406C, TK-405, TK-406, TK-408, TK-409, TK-OIL1, TK-OIL2, TK-OIL3, TK-OIL4, TK-TEG, TK-AF1, TK-AF2, TK-AF3, and TK-AF4 were constructed before October 4, 2023 and have not been modified in a way that meets the definition of "modification" in §60.110c(e)(1); therefore, this regulation does not apply.
NSPS 40 CFR 60.330 Subpart GG	**Stationary Gas Turbines**	No	N/A	This Facility does not operate any sources to which this regulation is applicable.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from **Onshore Gas Plants**	No	N/A	This is not a natural gas processing plant; therefore, this regulation does not apply.
NSPS	Standards of Performance for **Onshore Natural**	No	N/A	This is not a natural gas processing plant; therefore, this regulation does not apply.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR Part 60 Subpart LLL	**Gas Processing**: SO_2 Emissions			
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	This facility was constructed after September 18, 2015; therefore, this regulation does not apply.
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced **After** September 18, 2015	No	N/A	This facility was constructed after December 6, 2022; therefore, this regulation does not apply.
NSPS 40 CFR Part 60 Subpart OOOOb	Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022	Yes	FUG, COMP 1-8 FUG	Fugitive equipment components are subject to LDAR requirements as the facility was constructed after December 6, 2022. ONEOK will conduct routine fugitive leak monitoring using optical gas imaging (OGI) or EPA Method 21. The group of tanks at the Facility are considered a storage vessel battery under 60.5365b(e). Per §60.5365b(e)(2), this registration establishes a legally and practically enforceable limit on the storage vessels, which are manifolded together and equipped with a closed vent control system (VRU) and a backup control device (ECD), resulting in controlled VOC emissions by at least 95%. The cumulative potential emissions are less than 6 tpy VOC and 20 tpy methane; therefore, the tanks are not an affected facility or subject to the requirements of this Subpart. Storage vessels TK-405, TK-406, TK-408, TK-409, TK-OIL1, TK-OIL2, TK-OIL3, TK-OIL4, TK-TEG, TK-AF1, TK-AF2, TK-AF3, and TK-AF4 have uncontrolled emissions less than 6 tpy VOC and 20 tpy methane and are not subject to this Subpart. The pneumatics at the Facility are air driven and therefore not subject to the requirements of this Subpart. Reciprocating compressors manufactured after December 6, 2022 are affected facilities under 60.5365b(c).
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression	No	N/A	This Facility does not operate any sources to which this regulation is applicable.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	Ignition Internal Combustion Engines			
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Yes	ENG-1 through ENG-8, GEN-1	ENG-1 through ENG-8 and GEN-1 were manufactured after June 12, 2006 and have maximum engine power greater than 500 HP. Therefore, they are subject to this Subpart.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	This Facility does not operate any sources to which this regulation is applicable.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	This Facility does not operate any sources to which this regulation is applicable.
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	This facility is not a municipal solid waste landfill and is therefore not subject to this regulation.
NESHAP 40 CFR 61 Subpart A	General Provisions	No	N/A	This facility is not subject to any Subparts of 40 CFR 61.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for **Mercury**	No	N/A	This Facility does not operate any sources to which this regulation is applicable. The provisions of this Subpart are applicable to those stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for **Equipment Leaks** (Fugitive Emission Sources)	No	N/A	This Subpart is not applicable as the facility equipment does not operate in VHAP service. VHAP service is a piece of equipment, which contains or encounters a fluid that is at least 10% weight of VHAP. VHAP is a substance regulated under this Subpart for which a standard for equipment leaks of VHAPs has been promulgated.
MACT 40 CFR 63, Subpart A	General Provisions	Yes	ENG-1 through ENG-8, GEN-1, DEHY-1	Applies if any other Subpart in 40 CFR 63 applies.
MACT 40 CFR 63.760 Subpart HH	**Oil and Natural Gas Production Facilities**	Yes	DEHY-1	The dehydrator (Unit DEHY-1) is located at an area source of HAPS and has the potential to emit less than 1 tpy (0.90 megagram per year) of benzene. Therefore, it is subject to the operating and recordkeeping requirements of §63.764(e)(1)(ii).

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
MACT 40 CFR 63 Subpart HHH		No	N/A	This facility is not a natural gas transmission or storage facility; therefore, this Subpart does not apply.
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	RBL-1 is a process heater that is located at a facility that is a not major source of HAPs; therefore, this Subpart 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 facility does not contain coal or oil fire electric utility steam generating units; therefore, this regulation does not apply.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (**RICE MACT**)	Yes	ENG-1 through ENG-8, GEN-1	ENG-1 through ENG-8 and GEN-1 are stationary internal combustion engines that are operated at an area source of HAPs; therefore, these engines are subject to this Subpart.
40 CFR 64	**Compliance Assurance Monitoring**	No	N/A	This facility is submitting an application pursuant of 20.2.72.200A.(1) NMAC for an NSR permit. Thus, this regulation does not apply.
40 CFR 68	**Chemical Accident Prevention**	Yes	Facility	The facility has more than a threshold quantity of a regulated substance in a process, as determined under §68.115. The owner will comply by maintaining a Risk Management Plan.
Title IV – Acid Rain 40 CFR 72	**Acid Rain**	No	N/A	This facility is not an acid rain source; therefore, this regulation does not apply.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
Title IV – Acid Rain 40 CFR 73	**Sulfur Dioxide** Allowance Emissions	No	N/A	This facility is not an acid rain source; therefore, this regulation does not apply.
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 and is therefore not subject to this regulation.
Title IV – Acid Rain 40 CFR 76	**Acid Rain** Nitrogen Oxides **Emission Reduction Program**	No	N/A	This facility is not an acid rain source; therefore, this regulation does not apply.
Title VI – 40 CFR 82	Protection of **Stratospheric Ozone**	Yes	Facility	This facility will have appliances containing CFCs. The owner will use only certified technicians for the maintenance, service, repair and disposal of appliances to comply with this regulation.

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.

Startup and shutdown procedures are either based on manufacturer's recommendations or based on ONEOK's experience with specific equipment. These procedures are designed to proactively address the potential for malfunction to the minimize emissions from the facility during events that result in shutdown and subsequent startup.

Equipment located at this facility is equipped with various safety devices and features that aid in the prevention of excess emissions in the event of an operational emergency. If an operational emergency does occur and excess emissions occur, ONEOK will submit the required Excess Emissions Report as per 20.2.7 NMAC. Corrective action to eliminate the excess emissions and prevent recurrence in the future will be undertaken as quickly as safety allows.

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: www.env.nm.gov/air-quality/permitting-section-procedures-and-guidance/. 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.

There are no alternative operating scenarios.

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.	**X**
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above.	
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	

Check each box 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.

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.

Compliance Test History Table

Unit No.	Test Description	Test Date
ENG-1	Initial test in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	8/19/2024
ENG-1	Tested in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	8/7/2025
ENG-2	Initial test in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	8/20/2024
ENG-2	Tested in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	8/7/2025
ENG-3	Initial test in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	5/15/2024
ENG-3	Tested in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	4/16/2025
ENG-4	Initial test in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	4/24/2024
ENG-4	Tested in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	4/16/2025
ENG-5	Initial test in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	4/24/2024
ENG-6	Initial test in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	9/26/2024
ENG-6	Tested in accordance with EPA test methods for VOC, NOx, and CO as required by NSPS JJJJ.	9/4/2025

Section 22: Certification

Company Name: ONEOK, Inc.

I, Sypy Thomas, 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 ____ day of _____, _____, upon my oath or affirmation, before a notary of the State of

_____.

_____ _____
*Signature Date

_____ _____
Printed Name Title

Scribed and sworn before me on this ____ day of _____, _____.

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

_____ day of _____, _____.

_____ _____
Notary's Signature Date

_____
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.