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September 11, 2024 **FedEx 2793 9146 9473**

Ms. Melinda Owens
Permitting Section Chief
Air Quality Bureau
New Mexico Environment Department
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*

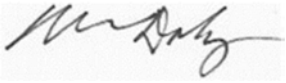
Dear Ms. Owens:

Attached please find an application for a Title V Permit Renewal for El Paso Natural Gas Company, L.L.C. (EPNG) 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 permit 0613-M13 and Title V Operating Permit P048-R4.

The format and content of this application are consistent with the Bureau's current policy regarding Title V applications. The Title V Permit P048-R4 expires on September 18, 2025. 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. Secure electronic transfer will be made when instruction is received from the Bureau. Please feel free to contact me at (303)914-7616 if you have any questions regarding this application.

Sincerely,



Weiwen Daly
Sr. EHS Engineer
Kinder Morgan Natural Gas Pipelines
Air Permitting and Compliance - East

Enclosure (EPNG Blanco Compressor Station A Title V Renewal Application)

September 25, 2024

Dear Customer,

The following is the proof-of-delivery for tracking number: 279391469473

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# TITLE V OPERATING PERMIT RENEWAL APPLICATION

## EL PASO NATURAL GAS COMPANY, L.L.C.

## BLANCO COMPRESSOR STATION A

SEPTEMBER 2024

SUBMITTED BY:


**El Paso Natural Gas Company, L.L.C.**
2527 Foresight Circle
Grand Junction, CO 81505


SUBMITTED TO:

**New Mexico Environmental Department**
525 Camino de los Marquez, Suite 1
Santa Fe, CO 87505

| **Mail Application To:** | | **For Department use only:** |
|---|---|---|
| New Mexico Environment Department<br>Air Quality Bureau<br>Permits Section<<br>525 Camino de los Marquez, Suite 1<br>Santa Fe, New Mexico, 87505<br><br>Phone: (505) 476-4300<br>Fax: (505) 476-4375<br>www.env.nm.gov/aqb | | |

# 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.

**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.
☑ I acknowledge there is an annual fee for permits in addition to the permit review fee: www.env.nm.gov/air-quality/permit-fees-2/.
☐ This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full $500.00 filing fee is included with this application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information: www.env.nm.gov/air-quality/small-biz-eap-2/.)

**Citation:** Please provide the **low level citation** under which this application is being submitted: **20.2.70.300.B.2 NMAC**
(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 1st 3 to 5 #s of permit IDEA ID No.): ***1147*** | Updating Permit/NOI #: ***P048-R4*** |
| 1 | Facility Name: ***Blanco Compressor Station A*** | Plant primary SIC Code (4 digits): ***4922*** | |
| | | Plant NAIC code (6 digits): ***486210*** | |
| a | Facility Street Address (If no facility street address, provide directions from a prominent landmark):<br>***81 County Road 4900, Bloomfield, NM 87413***<br>***From the intersection of Hwy 64 and North 1st Street in Bloomfield, NM head north on North 1st Street for approximately 1.5 miles. Turn right onto Rd 4900/Arizona Road. 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: ***(970) 208-1268*** | |
| a | Plant Operator Address: ***2527 Foresight Circle, Grand Junction, CO 81505*** | | |

| | | |
|---|---|---|
| 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: ***(970) 208-1268*** |
| a | Plant Owner(s) Mailing Address(s): ***2527 Foresight Circle, Grand Junction, CO 81505*** | |
| 4 | Bill To (Company): ***El Paso Natural Gas Company, L.L.C***. | Phone/Fax: ***(303) 914-7616*** |
| a | Mailing Address: 1667 ***Cole Blvd. Ste. 300, Lakewood CO 80401*** | E-mail: weiwen_daly@kindermorgan.com |
| 5 | ☑ Preparer: ***ALL4 LLC***<br>☐ Consultant: ***Chris Ward*** | Phone/Fax: ***(770) 557-2798*** |
| a | Mailing Address: ***10707 Corporate Dr, Suite 170, Stafford, TX 77477*** | E-mail: cward@all4inc.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: ***Weiwen Daly*** | Title: ***EHS Engineer – Air Permitting and Compliance*** |
| a | E-mail: weiwen_daly@kindermorgan.com | Phone/Fax: ***(303) 914-7616*** |
| b | Mailing Address: ***1667 Cole Blvd, Suite 300, Lakewood, CO 80401*** | |
| c | The designated Air permit Contact will receive all official correspondence (i.e. letters, permits) from the Air Quality Bureau. | |

## Section 1-B: Current Facility Status

| | | |
|---|---|---|
| 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?<br>☐ 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?<br>☑ 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?<br>☐Yes ☐No ☑N/A | |
| 6 | Does this facility have a Title V operating permit (20.2.70 NMAC)?<br>☑ Yes ☐ No | If yes, the permit No. is: ***P048-R4*** |
| 7 | Has this facility been issued a No Permit Required (NPR)?<br>☐ 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)?<br>☑ Yes ☐ No | If yes, the permit No. is: ***0613-M13*** |
| 10 | Is this facility registered under a General permit (GCP-1, GCP-2, etc.)?<br>☐ 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: ***127.49 Mscf**** | Daily: ***3.06 MMscf**** | Annually: ***1,117 MMscf**** |
| b | Proposed | Hourly: ***127.49 Mscf**** | Daily: ***3.06 MMscf**** | Annually: ***1,117 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: ***127.49 Mscf**** | Daily: ***3.06 MMscf**** | Annually: ***1,117 MMscf**** |

| | | | | |
|---|---|---|---|---|
| b | Proposed | Hourly: ***127.49 Mscf**** | Daily: ***3.06 MMscf**** | Annually: ***1,117 MMscf**** |

***Values provided represent natural gas combusted in the Facility's natural gas-fired engines (not gas transported through the compressor station) as this is the metric most representative of emissions.***

## Section 1-D: Facility Location Information

| | | | | | |
|---|---|---|---|---|---|
| 1 | Section: ***14*** | Range: ***11W*** | 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): ***235,520 E*** | | | UTM N (in meters, to nearest 10 meters): ***4,069,280 N*** | |
| b | **AND** Latitude (deg., min., sec.): ***36° 43' 56.734" N*** | | | Longitude (deg., min., sec.): ***-107° 57' 42.369" 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): ***From the intersection of Highway 64 and North 1st Street in Bloomfield, NM head north on North 1st Street for approximately 1.5 miles. Turn right onto Rd 4900/Arizona Road. After approximately 0.7 miles, the facility will be on your right.*** | | | | |
| 5 | The facility is ***0.1*** (distance) miles ***North*** (direction) of ***Bloomfield, NM*** (nearest town). | | | | |
| 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:** ***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/air-quality/modeling-publications/ )? ☐ Yes ☐ No ☑ N/A (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: | | | | |
| 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***<br><br>"**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?<br>☐ Yes ☑ No<br>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<br>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*** | ($\frac{\text{hours}}{\text{year}}$): ***8,760*** | |
| 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***<br><br>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.) |

## 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): ***Ted Meinhold*** | Phone: ***(713) 420-2765*** |
| a | A. R.O. Title: ***Vice President, Operations*** | A. R.O. e-mail: ted_meinhold@kindermorgan.com |
| b | A. R. O. Address: ***1001 Louisiana Street, Suite 1000, Houston, TX 77002*** | |
| 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):<br>****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.***<br>****Natural Gas Pipeline of America***<br>****TransColorado Gas Transmission 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 Street, 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: ***Weiwen Daly (303) 914-7616 & Bronson Ashcroft (505) 632-6270*** |
| 7 | Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes:<br>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: Navajo Nation (24 km), Southern Ute (32 km), Ute Mountain (20 km), Jicarilla Apache Reservation (56 km)*** |

# Section 1-I – Submittal Requirements

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

## Hard Copy Submittal Requirements:

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

2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This copy should be printed in book form, 3-hole punched, and **must be double sided**. Note that this is in addition to the head-to-to 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.

3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these permit application submittals, two CD copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a single CD submittal. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB's secure file transfer service.

**Electronic files sent by (check one):**

☐ CD/DVD attached to paper application

☑ secure electronic transfer. Air Permit Contact Name_***Weiwen Daly***____, Email_weiwen_daly@kindermorgan.com_ Phone number _***(303) 914-7616***_.

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

4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.

5) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver** and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling ***summary report only*** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.

6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
   a. one additional CD copy for US EPA,
   b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
   c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

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

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

1) All required electronic documents shall be submitted as 2 separate CDs or submitted through the AQB secure file transfer service. Submit a single PDF document of the entire application as submitted and the individual documents comprising the application.

2) The documents should also be submitted in Microsoft Office compatible file format (Word, Excel, etc.) allowing us to access the text and formulas in the documents (copy & paste). Any documents that cannot be submitted in a Microsoft Office compatible format shall be saved as a PDF file from within the electronic document that created the file. If you are unable to provide Microsoft office compatible electronic files or internally generated PDF files of files (items that were not created electronically: i.e. brochures, maps, graphics, etc,), submit these items in hard copy format. We must be able to review the formulas and inputs that calculated the emissions.

3) It is preferred that this application form be submitted as 4 electronic files (3 MSWord docs: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and 1 Excel file of the tables (Universal Application section 2 [UA2]). Please include as many of the 3-19 Sections as practical in a single MS Word electronic document. Create separate electronic file(s) if a single file becomes too large or if portions must be saved in a file format other than MS Word.

4) The electronic file names shall be a maximum of 25 characters long (including spaces, if any). The format of the electronic Universal Application shall be in the format: "A-3423-FacilityName". The "A" distinguishes the file as an application submittal, as opposed to other documents the Department itself puts into the database. Thus, all electronic application submittals should begin with "A-". Modifications to existing facilities should use the core permit number (i.e. '3423') the Department assigned to the facility as the next 4 digits. Use 'XXXX' for new facility applications. The format of any separate electronic submittals (additional submittals such as non-Word attachments, re-submittals, application updates) and Section document shall be in the format: "A-3423-9-description", where "9" stands for the section # (in this case Section 9-Public Notice). Please refrain, as much as possible, from submitting any scanned documents as this file format is extremely large, which uses up too much storage capacity in our database. Please take the time to fill out the header information throughout all submittals as this will identify any loose pages, including the Application Date (date submitted) & Revision number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

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**Section 11:** **Source Determination**
**Section 12:** **PSD Applicability Determination for All Sources & Special Requirements for a PSD Application**
**Section 13:** **Discussion Demonstrating Compliance with Each Applicable State & Federal Regulation**
**Section 14:** **Operational Plan to Mitigate Emissions**
**Section 15:** **Alternative Operating Scenarios**
**Section 16:** **Air Dispersion Modeling**
**Section 17:** **Compliance Test History**
**Section 18:** **Addendum for Streamline Applications (streamline applications only)**
**Section 19:** **Requirements for the Title V (20.2.70 NMAC) Program (Title V applications only)**
**Section 20:** **Other Relevant Information**

**Section 21: Addendum for Landfill Applications**

**Section 22: Certification Page**

Change Log – Do **not** submit this page with your application.

If you are using a form older than the most current form posted on the website, you are required to incorporate the changes listed. Periodically, AQB will announce when older form versions will no longer be accepted.

| Version Date | Changes Incorporated |
|---|---|
| 4/1/2021 | Current version of this form. Older versions are not accepted. |
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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] / Date of Construction/ Reconstruction[2] | Controlled by Unit # / Emissions vented to Stack # | Source Classification Code (SCC) | For Each Piece of Equipment, Check One | RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB)[4] | Replacing Unit No. |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| A-01 | RICE | Cooper Bessemer | GMV10-TF | 43051 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-01 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-02 | RICE | Cooper Bessemer | GMV10-TF | 43050 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-02 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-03 | RICE | Cooper Bessemer | GMV10-TF | 43052 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-03 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-04 | RICE | Cooper Bessemer | GMV10-TF | 43058 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-04 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-05 | RICE | Cooper Bessemer | GMV10-TF | 43054 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-05 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-06 | RICE | Cooper Bessemer | GMV10-TF | 43057 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-06 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-07 | RICE | Cooper Bessemer | GMV10-TF | 43053 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-07 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-08 | RICE | Cooper Bessemer | GMV10-TF | 43055 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-08 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-09 | RICE | Cooper Bessemer | GMV10-TF | 43056 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-09 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-10 | RICE | Cooper Bessemer | GMV10-TF | 43400 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-10 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-11 | RICE | Cooper Bessemer | GMV10-TF | 43399 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-11 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-12 | RICE | Cooper Bessemer | GMV10-TF | 43398 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-12 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-13 | RICE | Cooper Bessemer | GMV10-TF | 43397 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-13 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |
| A-14 | RICE | Cooper Bessemer | GMV10-TF | 42008 | 1100 hp | 943 hp | Unknown<br>August 1953 | N/A<br>A-14 | 20200252 | ☑ Existing (unchanged) ☐ To be Removed<br>☐ New/Additional ☐ Replacement Unit<br>☐ To Be Modified ☐ To be Replaced | 2SLB | N/A |

[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.
[4] "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

# Table 2-B: Insignificant Activities[1] (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 https://www.env.nm.gov/wp-content/uploads/sites/2/2017/10/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. / Serial No. | Max Capacity / Capacity Units | List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5) / Insignificant Activity citation (e.g. IA List Item #1.a) | Date of Manufacture /Reconstruction[2] / Date of Installation /Construction[2] | For Each Piece of Equipment, Check Onc |
|---|---|---|---|---|---|---|---|
| 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 | |
| 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 | Unknown | |
| 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 | Unknown | 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 March 24, 2005. Emissions from these insignificant activities do not need to be reported, unless specifically requested.

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

# Table 2-C: Emissions Control Equipment

Unit and stack numbering must correspond throughout the application package. Only list control equipment for TAPs if the TAP's maximum uncontrolled emissions rate is over its respective threshold as listed in 20.2.72 NMAC, Subpart V, Tables A and B. In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions.

| Control Equipment Unit No. | Control Equipment Description | Date Installed | Controlled Pollutant(s) | Controlling Emissions for Unit Number(s)[1] | Efficiency (% Control by Weight) | Method used to Estimate Efficiency |
|---|---|---|---|---|---|---|
| N/A | N/A | N/A | N/A | N/A | N/A | N/A |
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[1] List each control device on a separate line. For each control device, list all emission units controlled by the control device.

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

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

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

| Unit No. | NOx | | CO | | VOC | | SOx | | PM[1] | | PM10[1] | | PM2.5[1] | | $H_2S$ | | 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 |
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| **Totals** | | | | | | | | | | | | | | | | | | |

[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 PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

# Table 2-E: Requested Allowable Emissions

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

| Unit No. | NOx | | CO | | VOC | | SOx | | PM[1] | | PM10[1] | | PM2.5[1] | | $H_2S$ | | 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 |
| A-01 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-02 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-03 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-04 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-05 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-06 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-07 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-08 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-09 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-10 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-11 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-12 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-13 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
| A-14 | 21.91 | 95.97 | 2.83 | 12.40 | 0.89 | 3.90 | 4.60E-03 | 0.020 | 0.44 | 1.94 | 0.44 | 1.94 | 0.44 | 1.94 | - | - | - | - |
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| **Totals** | **306.74** | **1,344** | **39.62** | **173.6** | **12.45** | **54.54** | **0.064** | **0.28** | **6.20** | **27.16** | **6.20** | **27.16** | **6.20** | **27.16** | **-** | **-** | **-** | **-** |

[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 PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

# Table 2-F: Additional Emissions during Startup, Shutdown, and Routine Maintenance (SSM)

☐ This table is intentionally left blank since all emissions at this facility due to routine or predictable startup, shutdown, or scehduled maintenance are no higher than those listed in Table 2-E and a malfunction emission limit is not already permitted or requested. If you are required to report GHG emissions as described in Section 6a, include any GHG emissions during Startup, Shutdown, and/or Scheduled Maintenance (SSM) in Table 2-P. Provide an explanations of SSM emissions in Section 6 and 6a.

All applications for facilities that have emissions during routine our predictable startup, shutdown or scheduled maintenance (SSM)[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 | | PM[2] | | PM10[2] | | PM2.5[2] | | $H_2S$ | | 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 | - | - | - | - | - | - | - | - | - | - | - | - |
| **Totals** | - | - | - | - | * | 10.00 | - | - | - | - | - | - | - | - | - | - | - | - |

[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.

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

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

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

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

| Stack No. | Serving Unit Number(s) from Table 2-A | NOx | | CO | | VOC | | SOx | | PM | | PM10 | | PM2.5 | | ☐ $H_2S$ or ☐ 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 |
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| **Totals**: | | | | | | | | | | | | | | | | | |

# Table 2-H: Stack Exit Conditions

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

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

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

| Stack No. | Unit No.(s) | Total HAPs | | Formaldehyde ☑ HAP or ☐ TAP | | Acrolein ☑ HAP or ☐ TAP | | Acetaldehyde ☑ HAP or ☐ TAP | | Methanol ☑ HAP or ☐ TAP | | Provide Pollutant Name Here ☐ HAP or ☐ TAP | | Provide Pollutant Name Here ☐ HAP or ☐ TAP | | Provide Pollutant Name Here ☐ HAP or ☐ TAP | | Provide Pollutant Name Here ☐ HAP or ☐ TAP | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr |
| A-01 | A-01 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-02 | A-02 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-03 | A-03 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-04 | A-04 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-05 | A-05 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-06 | A-06 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-07 | A-07 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-08 | A-08 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-09 | A-09 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-10 | A-10 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-11 | A-11 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-12 | A-12 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-13 | A-13 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
| A-14 | A-14 | 0.4 | 1.9 | 0.3 | 1.2 | 0.1 | 0.2 | 0.1 | 0.2 | 0.02 | 0.1 | | | | | | | | |
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| Totals: | | 6.22 | 27.25 | 3.82 | 16.73 | 0.75 | 3.27 | 0.75 | 3.26 | | | | | | | | | | |

# 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 | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-02 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-03 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-04 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-05 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-06 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-07 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-08 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-09 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-10 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-11 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-12 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-13 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
| A-14 | Sweet Natural Gas | Pipeline Quality Natural Gas | 902 Btu/scf | 9.11 Mscf | 79.77 MMscf | N/A | N/A |
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# Table 2-K: Liquid Data for Tanks Listed in Table 2-L

For each tank, list the liquid(s) to be stored in each tank. If it is expected that a tank may store a variety of hydrocarbon liquids, enter "mixed hydrocarbons" in the Composition column for that tank and enter the corresponding data of the most volatile liquid to be stored in the tank. If tank is to be used for storage of different materials, list all the materials in the "All Calculations" attachment, run the newest version of TANKS on each, and use the material with the highest emission rate to determine maximum uncontrolled and requested allowable emissions rate. The permit will specify the most volatile category of liquids that may be stored in each tank. Include appropriate tank-flashing modeling input data. Use additional sheets if necessary. Unit and stack numbering must correspond throughout the application package.

| Tank No. | SCC Code | Material Name | Composition | Liquid Density (lb/gal) | Vapor Molecular Weight (lb/lb*mol) | Average Storage Conditions | | Max Storage Conditions | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | Temperature (°F) | True Vapor Pressure (psia) | Temperature (°F) | True Vapor Pressure (psia) |
| N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
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# Table 2-L: Tank Data

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

| Tank No. | Date Installed | Materials Stored | Seal Type (refer to Table 2-LR below) | Roof Type (refer to Table 2-LR below) | Capacity | | Diameter (M) | Vapor Space (M) | Color (from Table VI-C) | | Paint Condition (from Table VI-C) | Annual Throughput (gal/yr) | Turn-overs (per year) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | (bbl) | ($M^3$) | | | Roof | Shell | | | |
| N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |

# 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 | |
| | | | | | **MG**: Medium Gray | |
| | | | | | **BL**: Black | |
| | | | | | **OT**: Other (specify) | |

Note: 1.00 bbl = 0.159 $M^3$ = 42.0 gal

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

| Material Processed | | | | Material Produced | | | |
|---|---|---|---|---|---|---|---|
| **Description** | **Chemical Composition** | **Phase (Gas, Liquid, or Solid)** | **Quantity (specify units)** | **Description** | **Chemical Composition** | **Phase** | **Quantity (specify units)** |
| N/A [1] | N/A [1] | N/A [1] | N/A [1] | N/A [1] | N/A [1] | N/A [1] | N/A [1] |
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[1] Facility does not process or produce materials, but is limited to transportation of natural gas. For this reason, no information is included in this table.
Total gas fired in the compressor engines has been represented on other relevant tables and in the application form

# Table 2-N: CEM Equipment

Enter Continuous Emissions Measurement (CEM) Data in this table. If CEM data will be used as part of a federally enforceable permit condition, or used to satisfy the requirements of a state or federal regulation, include a copy of the CEM's manufacturer specification sheet in the Information Used to Determine Emissions attachment. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

| Stack No. | Pollutant(s) | Manufacturer | Model No. | Serial No. | Sample Frequency | Averaging Time | Range | Sensitivity | Accuracy |
|---|---|---|---|---|---|---|---|---|---|
| N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
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# Table 2-O: Parametric Emissions Measurement Equipment

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

| Unit No. | Parameter/Pollutant Measured | Location of Measurement | Unit of Measure | Acceptable Range | Frequency of Maintenance | Nature of Maintenance | Method of Recording | Averaging Time |
|---|---|---|---|---|---|---|---|---|
| N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
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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 | $N_2O$ ton/yr | $CH_4$ ton/yr | $SF_6$ ton/yr | PFC/HFC ton/yr[2] | | | | | | | | | Total GHG Mass Basis ton/yr[4] | Total $CO_2e$ ton/yr[5] |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Unit No.** | **GWPs [1]** | **1** | **298** | **25** | **22,800** | **footnote 3** | | | | | | | | | | |
| **A-01[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-02[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-03[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-04[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-05[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-06[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-07[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-08[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-09[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-10[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-11[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-12[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-13[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **A-14[6]** | **mass GHG** | 4,698 | 8.85E-03 | 0.09 | | | | | | | | | | | 4,698 | |
| | **$CO_2e$** | 4,698 | 2.64 | 2.21 | | | | | | | | | | | | 4,703 |
| **SSM/M** | **mass GHG** | 3.35 | | 77.48 | | | | | | | | | | | 80.83 | |
| | **CO2e** | 3.35 | | 1,937 | | | | | | | | | | | | 1,940 |
| **Total** | **mass GHG** | 65,776 | 0.12 | 78.72 | | | | | | | | | | | 65,855 | |
| | **$CO_2e$** | 65,776 | 36.94 | 1,968 | | | | | | | | | | | | 67,781 |

[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] **$CO_2e$** 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 emissions 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).

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.

**Application Summary**

This application is being submitted for the renewal of Operating Permit No. P048-R4 for Blanco Compressor Station A (Blanco A; Facility). The Facility is owned and operated by El Paso Natural Gas Company, L.L.C. (EPNG), a Kinder Morgan company. This underlying regulatory basis for this submittal is 20.2.70.300.B.2 New Mexico Administrative Code (NMAC) which requires a Title V renewal application be submitted at least twelve months prior to expiration of the current permit. Title V Permit No. P048-R4 expires on September 18, 2025, with the renewal application due by September 18, 2024.

The permit is El Paso Natural Gas Company L.L.C.'s portion of New Source Review Permit No. 0613-M13, which represents a combined air quality permit for its Blanco A Compressor Station, Hilcorp Energy Company's San Juan Gas Plant, and Enterprise Field Services, L.L.C.'s Blanco C&D Compressor Station. Information on all three facilities and their respective permits is included in the table below.

| Facility Name | Facility Owner/Operator | Facility Permits |
|---|---|---|
| Blanco A Compressor Station | El Paso Natural Gas Company, L.L.C. | 0613-M13, P048-R4 |
| Blanco C&D Compressor Station | Enterprise Field Services, L.L.C. and Enterprise Products Operating, L.L.C. | 0613-M13, P218-R3 |
| San Juan Gas Plant | Hilcorp Energy Company | 0613-M13, P124-R4 |

The Facility is a major source of nitrogen oxides ($NO_X$) under the Prevention of Significant Deterioration (PSD) rules. It is a major source of $NO_X$, carbon monoxide (CO), formaldehyde, and total hazardous air pollutants (HAP) for operating permit purposes under Title V (20.2.70 NMAC). There are no changes

proposed to the Facility or the permit with this Application and therefore the major source status will remain the same following issuance of the renewed permit.

**Process Summary**

Blanco Compressor Station A is one of several stations that EPNG owns and operates to help provide natural gas compression to their pipeline network. The compression process at the Facility is accomplished with the use of 14 two-stroke, lean-burn (2SLB) natural-gas-fired reciprocating internal combustion engines (RICE) (Cooper Bessemer GMV10-TF, Equipment ID: A-1 to A-14) that drive the compressor units. The Standard Industrial Classification (SIC) code for the Facility is 4922 (Natural Gas Transmission). The North American Industry Classification System (NAICS) code is 48621 (Pipeline Transportation of Natural Gas).

The compressors, driven by the natural gas-fired turbines, receive a flow of natural gas from a common pipeline system. The engine operation is dependent on the amount of natural gas that is being transported to various customers along the pipeline system. Primary electric power at the Blanco Compressor Station A is provided by purchased electric power.

**SSM Routine or Predictable Emissions**

Startup, shutdown, and routine maintenance (SSM) emissions result from compressor and facility blowdowns and pipeline pigging. Insignificant activities include fugitive emissions (Unit F-001) and several small heaters used for space heat.

# Section 4

## Process Flow Sheet

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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.

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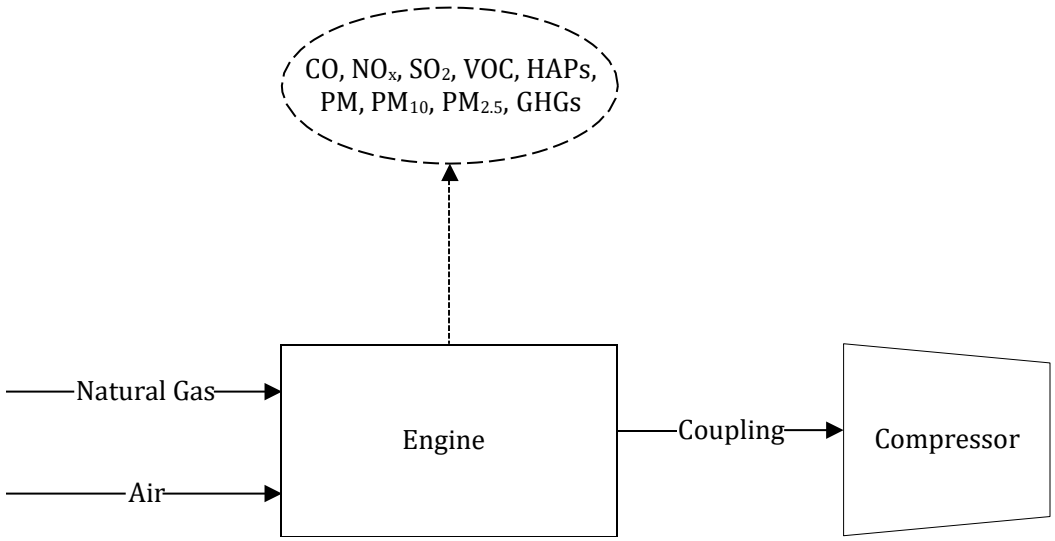
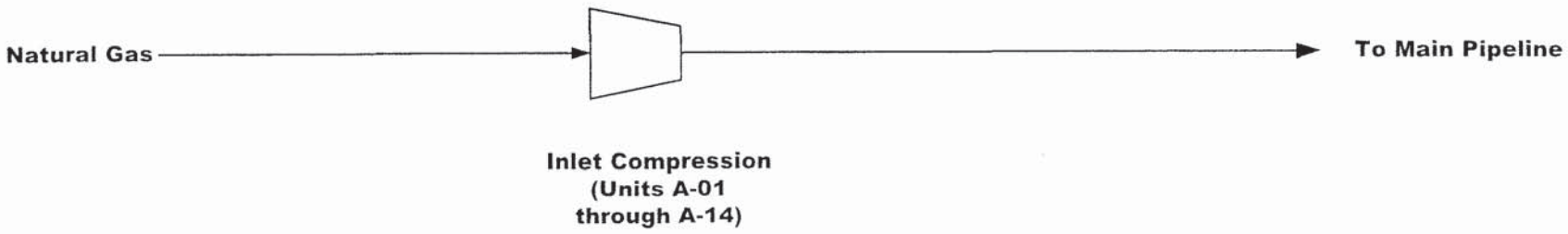
A process flow diagram is attached for the Facility as well as for the Cooper-Bessemer engines. Note that insignificant activities as defined in 20.2.70.7 NMAC are not included in the process flow diagrams.

**Figure 4-1**
**Cooper Bessemer Engines Process Flow Diagram**




Nitrogen Oxides ($NO_X$)
Carbon Monoxide (CO)
Sulfur Dioxide ($SO_2$)
Particulate Matter (PM)
Particulate Matter with an aerodynamic diameter less than 10 microns ($PM_{10}$)
Particulate Matter with an aerodynamic diameter less than 2.5 microns ($PM_{2.5}$)
Volatile Organic Compounds (VOC)
Hazardous Air Pollutants (HAP)
Greenhouse Gases (GHG)

**Figure 4-2**
**Blanco Compressor Station A Flow Diagram**




**Process Flow Diagram**
**Blanco A Compressor Station**

# Section 5

## Plot Plan Drawn To Scale

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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.

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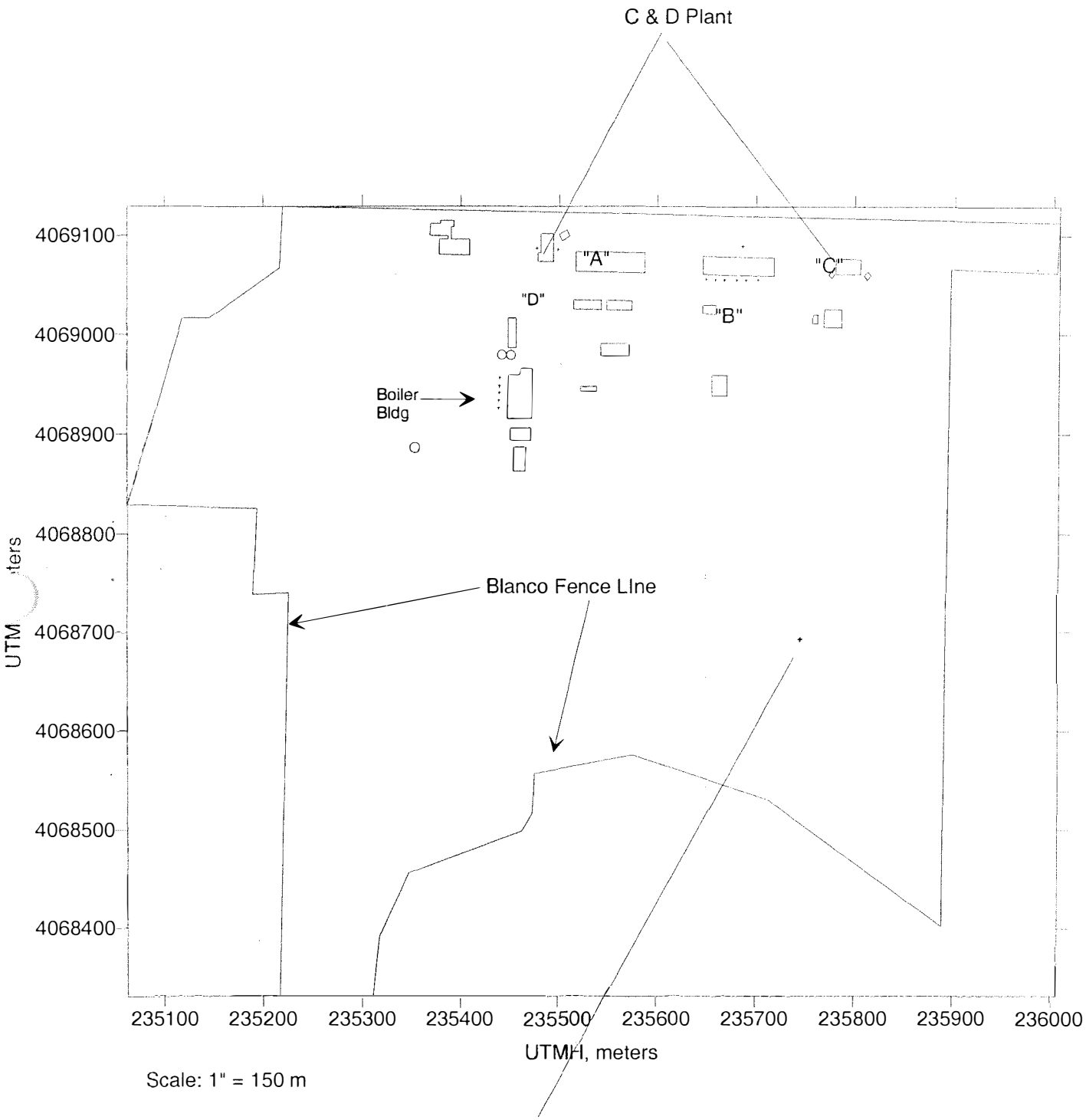
A plot plan is attached.




**Section 5**
**Site Layout**
**El Paso Natural Gas Blanco Compressor Station**

# Section 6

## All Calculations

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

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

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

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

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

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

**Significant Figures:**
**A.** All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.
**B.** At least 5 significant figures shall be retained in all intermediate calculations.
**C.** In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

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

**Control Devices:** In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

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Emissions units at Blanco Compressor Station A include the following:

- Fourteen Cooper-Bessemer GMV-10TF natural gas-fired reciprocating internal combustion compressor engines (Units A-01 to A-14).
- The following SSM activities:
  - Engine startup and shutdown emissions (Unit SSM/M).
  - Compressor and facility blowdown emissions (Unit SSM/M).
- The following insignificant activities:
  - Facility fugitive emissions (Unit F-001).
  - A number of insignificant storage tanks and small heaters.

Emissions calculations have been prepared for the compressor engines, SSM activities, and the equipment leak fugitive emissions. The approach for each of these is described further in this section.

## ROUTINE EMISSIONS SOURCES

### Cooper-Bessemer GMV-10TF Engines (Units A-01 to A-14)

There are no changes to the emissions calculations for the engines proposed with this application. Emissions of nitrogen oxides ($NO_X$), carbon monoxide (CO), sulfur dioxide ($SO_2$), and volatile organic compounds (VOC) are calculated based on emissions factors from AP-42 Ch. 3.3.2, Heavy-Duty, Natural, Gas-Fired Pipeline Compressor Engines (April 1976). Specifically, the factors are for reciprocating engines from Table 3.3.2-1, Emissions Factors for Heavy-Duty, Natural Gas-Fired Pipeline Compressor Engines and are

expressed as pounds per horsepower-hour (lb/hp-hr). To calculate emissions, an engine horsepower is needed. The horsepower utilized is based on the permitted horsepower rating of 943 hp. The annual total emissions are based on the engines running continuously for 8,760 hours per year).

Emissions of particular matter less than 10 microns in diameter ($PM_{10}$) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) have been calculated utilizing emissions factors from AP-42 Ch. 3.2, Natural Gas-Fired Reciprocating Internal Combustion Engines. Specifically, the factors are from Table 3.2-1, Uncontrolled Emission Factors for 2-Stroke Lean-Burn Engines, which are expressed as pounds per million British thermal units of fuel (lb/MMBtu). To calculate emissions, a heat input to the engine is necessary. This heat input is based on manufacturer specifications. The annual total emissions are based on the engines running continuously for 8,760 hours per year.

The HAP emissions factors were taken from GRI-HAPCalc, version 3.01 for 2SLB natural-gas fired engines and are expressed as grams per horsepower-hour (g/hp-hr). To calculate emissions, an engine horsepower is needed. The horsepower utilized is the same horsepower used to calculate emissions of $NO_X$, CO, $SO_2$, and VOC. Per guidance in Table 2-I, individual HAP are shown in Table 2-I. Individual HAP emissions are shown if the HAP emissions are greater than or equal to one ton per year.

Emissions of $CO_2$, $CH_4$, and $N_2O$ from the engines are calculated utilizing emissions factors from Tables C-1 and C-2 in 40 CFR Part 98 Subpart C. The emissions factors are expressed as kg/MMBtu. Therefore, to calculate emissions, a heat input to the engine is necessary. The same heat input utilized for determining emissions of the other pollutants has been utilized for calculating emissions of GHG. Annual emissions are based on the unit operating continuously for 8,760 hours per year. The total GHG emissions are converted to $CO_2e$ by multiplying each individual GHG by its GWP taken from Table A-1 of 40 CFR Part 98 Subpart A.

## INSIGNIFICANT ACTIVITIES

### Equipment Leak Fugitive Emissions (Uunit F-001)

Equipment leak fugitive VOC, HAP, and GHG emissions are quantified using the total hydrocarbon (THC) emissions factor from Table 2-4 of the U.S. EPA's Protocol for Equipment Leak Emission Estimates (November 1995) and a representative weight percent of VOC, HAP, $CO_2$, and $CH_4$. The weight percents of each compound were set equal to the percentage determined from a recent gas analysis. The final component counts are based on total counts for both the Facility and Enterprise Field Service L.L.C.'s Blanco C&D Compressor Station, with the assumption that EPNG's Facility consists of 30% of the total component count. Annual emissions are based on the Facility continuously operating for 8,760 hours per year. Facility wide fugitive emissions qualify as an insignificant activity. Unit F-001 is listed in Table 2-B.

### Insignificant Storage Tanks and Heaters

There are a number of storage tanks and small heaters 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 and can be provided upon request.

## ROUTINE OR PREDICTABLE EMISSIONS DURING STARTUP, SHUTDOWN, AND MAINTENANCE

Under NSR 0613-M13, 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." To demonstrate that the emissions are less than 10 tpy, calculations have been included with this application. EPNG has identified four different events that will result in the venting of natural gas: (1) blowdowns during shutdown of the engines; (2) venting of gas during subsequent startup of the engines; (3) venting during an emergency shutdown; and (4) pipeline pigging. The volume of gas vented during each activity and the number of events is based on the Facility's engineering judgment and experience. A representative gas analysis was utilized to quantify VOC, HAP, $CO_2$, and $CH_4$ present in the gas when vented. These compositions and the volume of gas vented were utilized to represent emissions from the startup and shutdown activities.

# Section 6.a

## Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

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**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)

Emissions of GHG from routine sources as well as SSM activities have been prepared and included with this application.

**Table 6-1**
**Potential to Emit Emissions Rates**
**Sitewide Summary**
**El Paso Natural Gas Company, L.L.C.**
**Blanco Compressor Station A - Bloomfield, NM**

| Pollutant | Potential Emissions (tpy) | | | | 20.2.74.7.AG NMAC Major Source Thresholds (tpy) | 20.2.70.7.R NMAC Major Source Thresholds (tpy) |
|---|---|---|---|---|---|---|
| | Engines (A01-A14) | SSM | Fugitives *Insignificant Activity* [(1)] | Total | | |
| $NO_x$ | 1,343.52 | | | 1,344 | 250 | 100 |
| CO | 173.54 | | | - | 250 | 100 |
| VOC | 54.57 | 10.00 | 0.29 | 64.57 | 250 | 100 |
| $SO_2$ | 0.28 | | | 0.28 | 250 | 100 |
| PM | 27.16 | | | 27.16 | 250 | 100 |
| $PM_{10}$ | 27.16 | | | 27.16 | 250 | 100 |
| $PM_{2.5}$ | 27.16 | | | 27.16 | 250 | 100 |
| $H_2S$ | - | 0.44 | | 0.44 | 250 | 100 |
| Total HAP | 27.25 | 0.03 | 0.01 | 27.27 | N/A | 25 |
| $CO_2e$ | 65,844 | 1,937 | 247 | 67,781 | 75,000 | 100,000 |

[(1)] Per 20.2.70.300.D(5), emissions information for insignificant activities is not required to be included in the application. However, fugitives are insignificant activities classified under Item 1.a of the current List of Insignificant Activities published by NMED, which is based on emissions being less than 1 tpy for any regulated air pollutant and less than 1 tpy or the de minimis level from "Documentation of De Minimis Rates for Proposed 40 CFR part 63 subpart B", EPA-453/R-93-035 for any hazardous air pollutants. Therefore, they have been included in this sitewide summary table.

**Table 6-2**
**Potential to Emit Emissions Rates**
**Natural Gas Pipeline Compressor Engines (Cooper-Bessemer GMV-10TF), A-01 to A-14**
**El Paso Natural Gas Company, L.L.C.**
**Blanco Compressor Station A - Bloomfield, NM**

| Pollutant | Emissions Factor | | Basis | Emissions Rate Per Engine | | Emission Rate All Engines | |
|---|---|---|---|---|---|---|---|
| | Value | Units | | (lb/hr) | (tpy) | (lb/hr) | (tpy) |
| ***Regulated NSR Pollutants*** | | | | | | | |
| $NO_x$ | 0.023 | lb/hp-hr | AP-42 Section 3.3.2, Table 3.3.2-1 (April 1976) | 21.91 | 95.97 | 306.74 | 1,343.52 |
| CO | 0.0030 | lb/hp-hr | AP-42 Section 3.3.2, Table 3.3.2-1 (April 1976) | 2.83 | 12.40 | 39.62 | 173.54 |
| VOC | 0.0009 | lb/hp-hr | AP-42 Section 3.3.2, Table 3.3.2-1 (April 1976) | 0.89 | 3.90 | 12.46 | 54.57 |
| $SO_2$ | 4.88E-06 | lb/hp-hr | AP-42 Section 3.3.2, Table 3.3.2-1 (April 1976) | 4.60E-03 | 0.02 | 0.06 | 0.28 |
| PM | 0.05 | lb/MMBtu | AP-42 Section 3.2, Table 3.2-1 [(July 2000), $PM_{Fil} + PM_{Con}$][(a)] | 0.44 | 1.94 | 6.20 | 27.16 |
| $PM_{10}$ | 0.05 | lb/MMBtu | AP-42 Section 3.2, Table 3.2-1 [(July 2000), $PM_{Fil} + PM_{Con}$][(a)] | 0.44 | 1.94 | 6.20 | 27.16 |
| $PM_{2.5}$ | 0.05 | lb/MMBtu | AP-42 Section 3.2, Table 3.2-1 [(July 2000), $PM_{Fil} + PM_{Con}$][(a)] | 0.44 | 1.94 | 6.20 | 27.16 |
| ***Hazardous Air Pollutants*** | | | | | | | |
| 1,1,2,2-Tetrachloroethane | 2.19E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 4.55E-04 | 1.99E-03 | 6.37E-03 | 0.03 |
| 1,1,2-Trichloroethane | 1.74E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 3.62E-04 | 1.58E-03 | 5.06E-03 | 0.02 |
| 1,1-Dichloroethane | 1.29E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 2.68E-04 | 1.17E-03 | 3.75E-03 | 0.02 |
| 1,3-Butadiene | 2.71E-03 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 5.63E-03 | 0.02 | 0.08 | 0.35 |
| 1,3-Dichloropropene | 1.45E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 3.01E-04 | 1.32E-03 | 4.21E-03 | 0.02 |
| 2,2,4-Trimethylpentane | 2.79E-03 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 5.80E-03 | 0.03 | 0.08 | 0.36 |
| 2-Methylnaphthalene | 7.06E-05 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 1.47E-04 | 6.43E-04 | 2.05E-03 | 9.00E-03 |
| Acenaphthene | 4.40E-06 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 9.15E-06 | 4.01E-05 | 1.28E-04 | 5.61E-04 |
| Acenaphthylene | 1.05E-05 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 2.18E-05 | 9.56E-05 | 3.06E-04 | 1.34E-03 |
| Acetaldehyde | 2.56E-02 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 0.05 | 0.23 | 0.75 | 3.26 |
| Acrolein | 2.57E-02 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 0.05 | 0.23 | 0.75 | 3.27 |
| Anthracene | 2.40E-06 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 4.99E-06 | 2.19E-05 | 6.99E-05 | 3.06E-04 |
| Benz(a)anthracene | 1.10E-06 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 2.29E-06 | 1.00E-05 | 3.20E-05 | 1.40E-04 |
| Benzene | 6.40E-03 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 0.01 | 0.06 | 0.19 | 0.82 |
| Benzo(e)pyrene | 1.00E-07 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 2.08E-07 | 9.11E-07 | 2.91E-06 | 1.27E-05 |
| Biphenyl | 1.30E-05 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 2.70E-05 | 1.18E-04 | 3.78E-04 | 1.66E-03 |
| Carbon Tetrachloride | 2.00E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 4.16E-04 | 1.82E-03 | 5.83E-03 | 0.03 |
| Chlorobenzene | 1.47E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 3.05E-04 | 1.33E-03 | 4.26E-03 | 0.02 |
| Chloroform | 1.55E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 3.23E-04 | 1.42E-03 | 4.52E-03 | 0.02 |
| Chrysene | 2.20E-06 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 4.57E-06 | 2.00E-05 | 6.40E-05 | 2.80E-04 |
| Ethylbenzene | 3.56E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 7.41E-04 | 3.25E-03 | 0.01 | 0.05 |
| Ethylene Dibromide | 2.42E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 5.04E-04 | 2.21E-03 | 7.05E-03 | 0.03 |
| Fluoranthene | 1.20E-06 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 2.49E-06 | 1.09E-05 | 3.49E-05 | 1.53E-04 |
| Fluorene | 5.60E-06 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 1.16E-05 | 5.10E-05 | 1.63E-04 | 7.14E-04 |
| Formaldehyde | 1.31E-01 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 0.27 | 1.19 | 3.82 | 16.73 |
| Methanol | 8.18E-03 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 0.02 | 0.07 | 0.24 | 1.04 |
| Methylene Chloride | 4.85E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 1.01E-03 | 4.42E-03 | 0.01 | 0.06 |
| n-Hexane | 1.47E-03 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 3.05E-03 | 0.01 | 0.04 | 0.19 |
| Naphthalene | 3.18E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 6.61E-04 | 2.89E-03 | 9.25E-03 | 0.04 |
| Phenanthrene | 1.17E-05 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 2.43E-05 | 1.07E-04 | 3.41E-04 | 1.49E-03 |
| Phenol | 1.39E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 2.89E-04 | 1.26E-03 | 4.04E-03 | 0.02 |
| Proponal | 2.49E-03 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 5.18E-03 | 0.02 | 0.07 | 0.32 |
| Pyrene | 1.90E-06 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 3.95E-06 | 1.73E-05 | 5.53E-05 | 2.42E-04 |
| Styrene | 1.81E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 3.76E-04 | 1.65E-03 | 5.27E-03 | 0.02 |
| Toluene | 3.18E-03 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 6.61E-03 | 0.03 | 0.09 | 0.41 |
| Vinyl Chloride | 8.15E-05 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 1.69E-04 | 7.42E-04 | 2.37E-03 | 0.01 |
| Xylenes | 8.85E-04 | g/hp-hr | GRI-HAPCalc 3.01 Engines Report | 1.84E-03 | 8.05E-03 | 0.03 | 0.11 |
| | | | **Total** | **0.44** | **1.95** | **6.22** | **27.25** |

**Table 6-2**
**Potential to Emit Emissions Rates**
**Natural Gas Pipeline Compressor Engines (Cooper-Bessemer GMV-10TF), A-01 to A-14**
**El Paso Natural Gas Company, L.L.C.**
**Blanco Compressor Station A - Bloomfield, NM**

| Pollutant | Emissions Factor | | Basis | Emissions Rate Per Engine | | Emission Rate All Engines | |
|---|---|---|---|---|---|---|---|
| | Value | Units | | (lb/hr) | (tpy) | (lb/hr) | (tpy) |
| ***Greenhouse Gases*** | | | | | | | |
| $CO_2$ | 53.06 | kg/MMBtu | 40 CFR Part 98, Subpart C, Table C-1 | 1,073 | 4,698 | 15,017.29 | 65,775.73 |
| $CH_4$ | 1.00E-03 | kg/MMBtu | 40 CFR Part 98, Subpart C, Table C-2 | 0.02 | 0.09 | 0.28 | 1.24 |
| $N_2O$ | 1.00E-04 | kg/MMBtu | 40 CFR Part 98, Subpart C, Table C-2 | 2.02E-03 | 8.85E-03 | 0.03 | 0.12 |
| $CO_2e$ [(b)] | -- | -- | 40 CFR Part 98, Subpart A, Table A-1 GWPs | 1,074 | 4,703 | 15,032.80 | 65,843.66 |

| Unit | Type | Make and Model | Rating[(c)] | BSFC | Heat Input | Annual Operating Hours |
|---|---|---|---|---|---|---|
| | | | (hp) | (Btu/hp-hr) | (MMBtu/hr) | (hours) |
| A-01 | Natural Gas Two-Stroke, Lean Burn Engine | Cooper-Bessemer GMV-10TF | 943 | 8,336 | 9.17 | 8,760 |

| Factor | Value |
|---|---|
| grams per pound | 453.592 |
| Number of engines | 14 |
| kg per lb | 0.4536 |

[(a)]PM emissions factors are the sum of filterable and condensable PM.

[(b)]$CO_2e$ based on multiplying $CO_2$ and $CH_4$ and $N_2O$ by the Global Warming Potentials (GWP) contained in 40 CFR 98 Subpart A and conversion factors as follows:

| Pollutants | GWP |
|---|---|
| $CO_2$ | 1 |
| $CH_4$ | 25 |
| $N_2O$ | 298 |

[(c)] Engine horsepower (hp) is set equal to the permitted value. Maximum horsepower is 1100 hp at sea level.

**Table 6-3**
**Potential to Emit Emissions Rates**
**Insignificant Activity - Equipment Leak Fugitives**
**El Paso Natural Gas Company, L.L.C.**
**Blanco Compressor Station A - Bloomfield, NM**

| Component | Component Count[a] | THC Emissions Factor | Stream Content [c] (wt %) | | | | Emissions | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | VOC [e] | | HAP [e] | | $CH_4$ | | $CO_2$ | | $CO_2e$ [d] |
| | | (lbs/hr-component)[b] | VOC | HAP | $CH_4$ | $CO_2$ | (lb/hr) | (tpy) | (lb/hr) | (tpy) | (lb/hr) | (tpy) | (lb/hr) | (tpy) | (tpy) |
| Valves | 520 | 9.92E-03 | 0.90% | 0.03% | 0.00% | 0.00% | 0.05 | 0.20 | 1.75E-03 | 7.65E-03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Pumps | 8 | 5.29E-03 | 0.90% | 0.03% | 97.02% | 0.00% | 3.98E-04 | 1.74E-03 | 1.50E-05 | 6.59E-05 | 0.04 | 0.19 | 0.00 | 0.00 | 4.72 |
| Pressure Relief | 8 | 1.94E-02 | 0.90% | 0.03% | 97.02% | 0.00% | 1.41E-03 | 6.17E-03 | 5.32E-05 | 2.33E-04 | 0.15 | 0.67 | 0.00 | 0.00 | 16.70 |
| Flanges | 1,987 | 8.60E-04 | 0.90% | 0.03% | 97.02% | 0.00% | 0.02 | 0.07 | 5.78E-04 | 2.53E-03 | 1.66 | 7.26 | 0.00 | 0.00 | 181.50 |
| Connectors | 8 | 4.41E-04 | 0.90% | 0.03% | 97.02% | 0.00% | 3.32E-05 | 1.45E-04 | 1.25E-06 | 5.49E-06 | 3.59E-03 | 0.02 | 0.00 | 0.00 | 0.39 |
| Open-ended lines | 94 | 4.41E-03 | 0.90% | 0.03% | 97.02% | 0.00% | 3.71E-03 | 0.02 | 1.40E-04 | 6.14E-04 | 0.40 | 1.76 | 0.00 | 0.00 | 43.99 |
| **Totals** | | | | | | | **0.07** | **0.29** | **2.53E-03** | **0.01** | **2.26** | **9.89** | **0.00** | **0.00** | **247.29** |

[a]Component counts estimated by El Paso Natural Gas Company staff on the basis that 30% of the total fugitive emissions presented in the application for Title V Permit No. P048-R4 can be reasonably apportioned to Blanco Compressor Station A.

[b]THC emissions factors from Table 2-4 of EPA-453/R-95-017, Protocol for Equipment Leak Emission Estimates (November, 1995).
The THC emissions factors were multiplied by the VOC weight percent and HAP weight percent to calculate VOC lb/hr and HAP lb/hr.
The THC emissions factors were multiplied by the $CO_2$ weight percent and $CH_4$ weight percent to calculate $CO_2$ lb/hr and $CH_4$ lb/hr.

[c]Stream content calculated using the gas analysis provided by Kinder Morgan for August 2024 Title V Renewal Application.

[d] $CO_2e$ based on multiplying $CO_2$ and $CH_4$ and $N_2O$ by the Global Warming Potentials (GWP) contained in 40 CFR 98 Subpart A as follows:

| Pollutants | GWP |
|---|---|
| $CO_2$ | 1 |
| $CH_4$ | 25 |
| $N_2O$ | 298 |

[e] The threshold for being considered insignificant is 1 tpy of any regulated air contaminant and 1 tpy or the de minimis level from U.S. EPA's "Documentation of De Minimis Rates for Proposed 40 CFR part 63 subpart B", EPA-453/R-93-035. The HAP emitted from these fugitive components is hexane, which has a de minimis value of 10 tpy. Therefore, the relevant insignificant activity limit is 1 tpy in all cases. The emissions of all pollutants from equipment leak fugitives is less than 1 tpy.

**Table 6-4**
**Potential to Emit Emissions Rates**
**Startup and Shutdown Emissions**
**El Paso Natural Gas Company, L.L.C.**
**Blanco Compressor Station A - Bloomfield, NM**

| Pollutant | Emissions Factor [a] | Emissions | |
|---|---|---|---|
| | (lb/scf) | (lb/hr) [b] | (tpy) |
| VOC | 3.79E-04 | 871.05 | 0.72 |
| $H_2S$ | 3.57E-07 | 0.82 | 6.75E-04 |
| HAP | 1.43E-05 | 32.91 | 0.03 |
| $CO_2$ | 0.00E+00 | 0.00 | 0.00 |
| $CH_4$ | 0.04 | 94,352.92 | 77.48 |
| GHG, $CO_2e$ [c] | - | | 1,937 |

| Emission Unit ID | Event | Volume Vented per Event[d] | Annual Events[d] | Annual Volume Vented |
|---|---|---|---|---|
| | | (Mscf/event) | (event/yr) | (Mscf/yr) |
| A01 | Unit Blowdown | 0.33 | 330 | 110 |
| A02 | Unit Blowdown | 0.30 | 330 | 100 |
| A03 | Unit Blowdown | 0.33 | 330 | 110 |
| A04 | Unit Blowdown | 0.30 | 330 | 100 |
| A05 | Unit Blowdown | 0.33 | 330 | 110 |
| A06 | Unit Blowdown | 0.26 | 330 | 86 |
| A07 | Unit Blowdown | 0.33 | 330 | 108 |
| A08 | Unit Blowdown | 0.26 | 330 | 86 |
| A09 | Unit Blowdown | 0.33 | 330 | 108 |
| A10 | Unit Blowdown | 0.26 | 330 | 86 |
| A11 | Unit Blowdown | 0.33 | 330 | 108 |
| A12 | Unit Blowdown | 0.31 | 330 | 103 |
| A13 | Unit Blowdown | 0.33 | 330 | 108 |
| A14 | Unit Blowdown | 0.31 | 330 | 103 |
| Station | Station ESD | 2,300 | 1 | 2,300 |
| Station | Pipeline Pigging | - | - | 50 |
| | | | **Total** | **3,777** |

[a]The $CO_2$ and $CH_4$ emissions factors are from Table 6-5 (weight of component per volume of gas).
The VOC emissions factor is the sum of the nonmethane and ethane VOC emission factors from Table 6-5.
The $H_2S$ emissions factor is based on an assumption of 0.25 gr/100 dscf in natural gas

[b] Maximum hourly emissions are based off of the maximum activity, or station ESD occurring in a single hour.

[c]GHG, $CO_2e$ Tons = $CO_2$ Emissions + ($CH_4$ Emissions x GWP of 25 ).

[d]Facility events based on operational history and professional experience. This calculation has been prepared and provided to demonstrate that the SSM emissions are less than 10 tpy. As allowed in 2.e in NMED's document "Implementation Gudiance for Permitting SSM Emissions and Excess Emissions", EPNG has conslidated SSM and upset/malfunction emissions in the permit with a total limit of 10 tpy per pollutant. With this renewal, EPNG would like to retain this limit.

**Table 6-5**
**Potential to Emit Emissions Rates**
**Gas Analysis**
**El Paso Natural Gas Company, L.L.C.**
**Blanco Compressor Station A - Bloomfield, NM**

| Component | VOC | HAP | Molecular Weight | Density[a] | Mole Percent[b] | lb Constituent/ lb-mol of Gas | Weight Percent[c] | Weight of Component per Volume of Gas[d] |
|---|---|---|---|---|---|---|---|---|
| | | | (lb/lb-mol) | (lb/scf) | (%) | (lb/lb-mol) | (%) | (lb/scf) |
| Nitrogen | N | N | 28.01 | 0.07 | 0.06% | 0.02 | 0.10% | 4.34E-05 |
| Carbon Dioxide | N | N | 44.01 | 0.12 | 0.00% | 0.00 | 0.00% | 0.00 |
| Methane | N | N | 16.04 | 0.04 | 97.06% | 15.57 | 97.02% | 0.04 |
| Ethane | N | N | 30.07 | 0.08 | 1.06% | 0.32 | 1.98% | 8.36E-04 |
| Propane | Y | N | 44.10 | 0.12 | 0.21% | 0.09 | 0.58% | 2.44E-04 |
| i-Butane | Y | N | 58.12 | 0.15 | 0.03% | 0.02 | 0.12% | 4.96E-05 |
| n-Butane | Y | N | 58.12 | 0.15 | 0.03% | 0.02 | 0.10% | 4.33E-05 |
| i-Pentane | Y | N | 72.15 | 0.19 | 0.01% | 6.49E-03 | 0.040% | 1.71E-05 |
| n-Pentane | Y | N | 72.15 | 0.19 | 0.01% | 3.82E-03 | 0.024% | 1.01E-05 |
| Hexane | Y | Y | 86.18 | 0.23 | 0.01% | 5.43E-03 | 0.034% | 1.43E-05 |
| | | | | **Total** | **98%** | **16.05** | **100%** | **0.04** |

[a]Density calculated assuming standard conditions of 60 degrees F and 14.969 psia, 379.5 ft^3/lb-mol.

[b]From March 2024 gas analysis provided by Kinder Morgan for August 2024 Title V Renewal Application.

[c]Calculated as the individual component's (Molecular Weight x Mole Percent), divided by the total (Molecular Weight x Mole Percent).

[d]Calculated as the density times the mole percent.

| Pollutant | Gas Content (lb/scf) [e] | Gas Weight Percent (%) [e] |
|---|---|---|
| VOC | 3.79E-04 | 0.896% |
| HAP | 1.43E-05 | 0.034% |
| $CO_2$ | 0.00E+00 | 0.00% |
| $CH_4$ | 0.04 | 97.02% |

[e] The gas content (lb/scf) is utilized for calculating emissions from SSM. The gas weight percent is utilized for calculating emissions from equipment leak fugitives.

# Section 7

## Information Used To Determine Emissions

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**<u>Information Used to Determine Emissions</u> shall include the following**:

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

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The following information used to determine emissions is attached:

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

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

**FUGITIVE EMISSIONS (UNIT F-001)**

- Table 2-4 of EPA-453/R-95-017, Protocol for Equipment Leak Emission Estimates (November 1995).

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 | *HAP Factors Not Used in this Application* | |
| 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 |

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

*by Susan Sercer*
*Alan Burgess*
*Tom Lahre*

3.3.2.1 General[1] – 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/$10^6$ $\underline{N}m^3$[f] | 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/$10^6$ $\underline{N}m^3$[g] | 4,700 | 1,940 | 280 | 9.2 | NA |

[a]All factors based on References 2 and 3.

[b]These 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.

[c]These factors represent total hydrocarbons. Nonmethane hydrocarbons are estimated to make up to 5 to 10 percent of these totals, on the average.

[d]Based on an assumed sulfur content of pipeline gas of 2000 gr/$10^6$ scf (4600 g/$\underline{N}m^3$). If pipeline quality natural gas is not fired, a material balance should be performed to determine $SO_2$ emissions based on the actual sulfur content.

[e]Not available from existing data.

[f]These factors are calculated from the above factors for reciprocating engines assuming a heating value of 1050 Btu/scf (9350 kcal/$\underline{N}m^3$) for natural gas and an average fuel consumption of 7500 Btu/hp-hr (2530 kcal/kW-hr).

[g]These factors are calculated from the above factors for gas turbines assuming a heating value of 1,050 Btu/scf (9,350 kcal/$\underline{N}m^3$) 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.

# GRI-HAPCalc ® 3.01
## Engines Report

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

| | | | |
|---|---|---|---|
| Butryaldehyde | 0.0153 | 0.00144220 g/bhp-hr | EPA |
| Cylclohexane | 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 |

Bloomberg Environment

Environment & Safety Resource Center℠

*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 $CO_2$ Emission Factors and High Heat Values for Various Types of Fuel

| Fuel type | Default high heat value | Default $CO_2$ 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) | $1.026 \times 10^{-3}$ | 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 |

Bloomberg Environment

Environment & Safety Resource Center℠

*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 $CH_4$ and $N_2O$ Emission Factors for Various Types of Fuel

| Fuel type | Default $CH_4$ emission factor (kg $CH_4$ /mmBtu) | Default $N_2O$ emission factor (kg $N_2O$/mmBtu) |
|---|---|---|
| Coal and Coke (All fuel types in Table C-1) | $1.1 \times 10^{-02}$ | $1.6 \times 10^{-03}$ |
| Natural Gas | $1.0 \times 10^{-03}$ | $1.0 \times 10^{-04}$ |
| Petroleum Products (All fuel types in Table C-1) | $3.0 \times 10^{-03}$ | $6.0 \times 10^{-04}$ |
| Fuel Gas | $3.0 \times 10^{-03}$ | $6.0 \times 10^{-04}$ |
| Other Fuels—Solid | $3.2 \times 10^{-02}$ | $4.2 \times 10^{-03}$ |
| Blast Furnace Gas | $2.2 \times 10^{-05}$ | $1.0 \times 10^{-04}$ |
| Coke Oven Gas | $4.8 \times 10^{-04}$ | $1.0 \times 10^{-04}$ |
| Biomass Fuels—Solid (All fuel types in Table C-1, except wood and wood residuals) | $3.2 \times 10^{-02}$ | $4.2 \times 10^{-03}$ |
| Wood and wood residuals | $7.2 \times 10^{-03}$ | $3.6 \times 10^{-03}$ |
| Biomass Fuels—Gaseous (All fuel types in Table C-1) | $3.2 \times 10^{-03}$ | $6.3 \times 10^{-04}$ |
| Biomass Fuels—Liquid (All fuel types in Table C-1) | $1.1 \times 10^{-03}$ | $1.1 \times 10^{-04}$ |

Note: Those employing this table are assumed to fall under the IPCC definitions of the "Energy Industry" or "Manufacturing Industries and Construction". In all fuels except for coal the values for these two categories are identical. For coal combustion, those who fall within the IPCC "Energy Industry" category may employ a value of 1g of $CH_4$ /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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United States
Environmental Protection
Agency

Office of Air Quality
Planning and Standards
Research Triangle Park NC 27711

EPA-453/R-95-017
November 1995

Air

EPA

# 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 |

[a]Water/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.

[b]These 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.

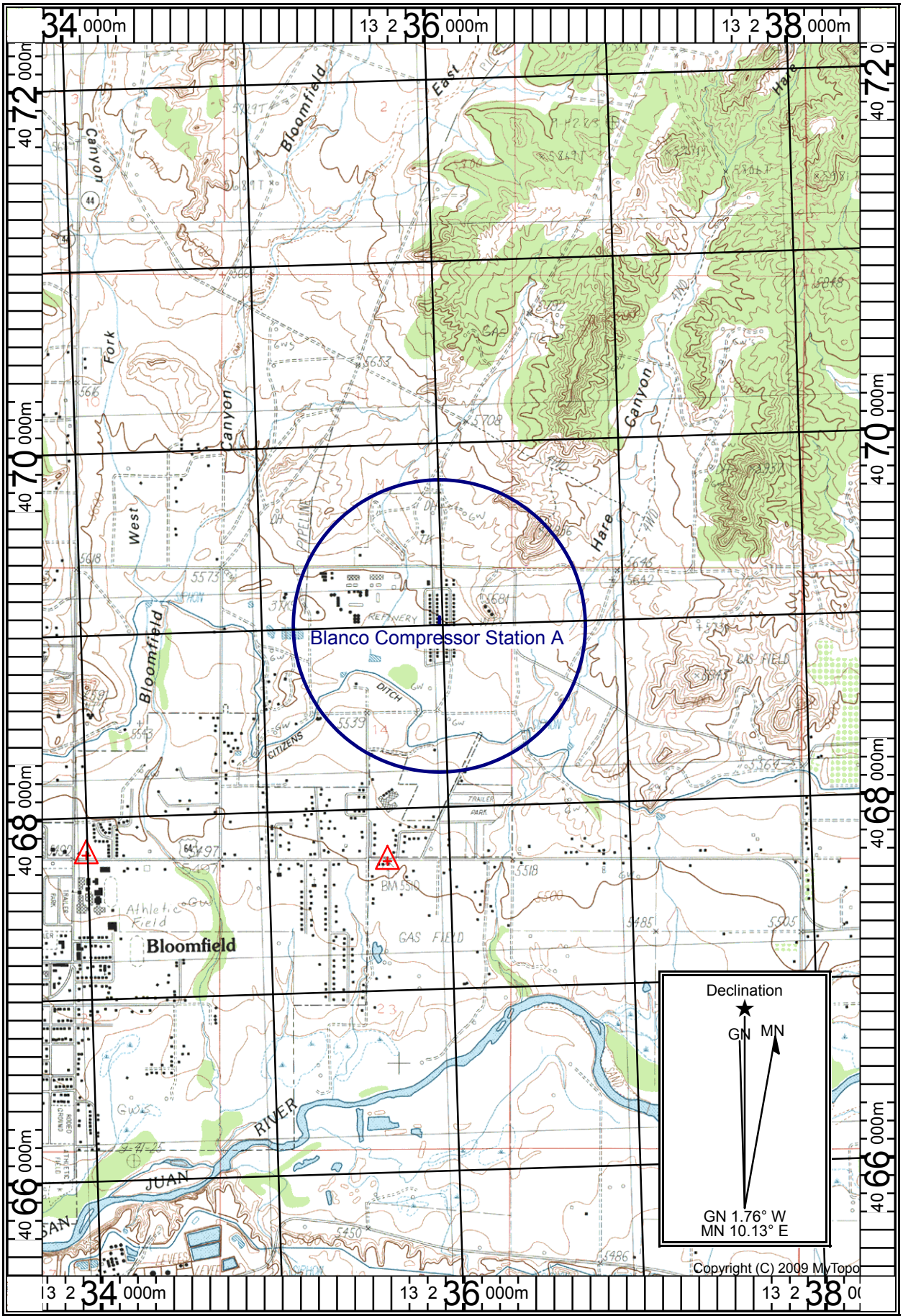
[c]The "other" equipment type was derived from compressors, diaphrams, drains, dump arms, hatches, instruments, meters, pressure relief valves, polished rods, relief valves, and vents. This "other" equipment type should be applied for any equipment type other than connectors, flanges, open-ended lines,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

# 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")

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☐ **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 <u>classified</u> <u>or</u> <u>legal</u> ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
10. ☐ A copy of the <u>display</u> ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.

11. ☐ A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.

---

**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-fired Cooper-Bessemer GMV-10TF compressor engines, permitted at 943 hp.

SSM/M emissions result from compressor and facility blowdowns. Insignificant activities include fugitive emissions (Unit F-001), 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** (list and describe)**:**
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-M13 issued jointly to Enterprise Products Operating/Enterprise Field Services, El Paso Natural Gas, and Hilcorp Energy Company. 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. Each company's assets are included in their own individual Title V operating permit, which were identified in Section 3 of this application.

# 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. **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 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/

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**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 | 20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. This facility meets maximum allowable concentrations of $SO_2$, hydrogen sulfide ($H_2S$), $NO_x$, 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 New Mexico Environment Department (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. |

**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.) |
|---|---|---|---|---|
| 20.2.34 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 | 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.**<br><br>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 Compressor Station A 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 Compressor Station A does not have a sulfur recovery plant. |

**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.) |
|---|---|---|---|---|
| 20.2.50 NMAC | Ozone Precursor Pollutants | Yes | F-001 | Blanco Compressor Station A is considered a natural gas transmission compressor station under the Ozone Precursor Pollutants Rule. The facility's engines (Units A-01 to A-14) each have a site horsepower rating of less than 1,000 hp; therefore the facility's engines are not subject to 20.2.50 NMAC (20.2.50.113 NMAC).<br><br>Additionally, the facility's engines (Units A-01 to A-14) are not subject to 20.2.50 NMAC due to their operation as compressors at a transmission compressor station (20.2.50.114 NMAC).<br><br>The facility is subject to the Equipment Leak and Fugitive Emissions standards found in 20.2.50.116 NMAC since the facility is classified as a transmission compressor station. |
| 20.2.61.109 NMAC | Smoke & Visible Emissions | Yes | A-01 to A-14 | This regulation establishes controls on smoke and visible emissions from certain sources, including stationary combustion equipment. The facility's engines (A-01 to 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 HAP. |
| 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-M13. |
| 20.2.73 NMAC | NOI & Emissions | Yes | Facility | This regulation establishes emission inventory requirements. The facility meets the applicability requirements of 20.2.73.300 NMAC. The facility will |

**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.) |
|---|---|---|---|---|
| | Inventory Requirements | | | 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 PSD permit. The facility is an existing PSD major source for NOx. 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 HAP subject to 40 CFR Part 61. This facility could emit HAP 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 HAP, 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:**

| 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 (NAAQS). The facility meets all applicable NAAQS for $NO_X$, CO, $SO_2$, $H_2S$, $PM_{10}$, and $PM_{2.5}$ under this regulation. |
| NSPS 40 CFR 60, Subpart A | General Provisions | 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 CFR60.40a, Subpart Da | Subpart Da, Performance Standards for **Electric Utility Steam Generating Units** | No | N/A | This regulation establishes standards of performance for electric utility steam generating units. This regulation does not apply because the facility does not operate any electric utility steam generating units. |
| NSPS 40 CFR60.40b Subpart Db | **Industrial Commercial Institutional 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. |

**Table for Applicable Federal Regulations:**

| Federal Regulation Citation | Title | Applies? Enter Yes or No | Unit(s) or Facility | Justification: |
|---|---|---|---|---|
| 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. [40 CFR 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 liquids (VOL) storage vessels (including petroleum liquid storage vessels) for which construction, reconstruction, or modification commenced after July 23, 1984.<br><br>This facility does not have storage vessels with a capacity greater than or equal to 75 cubic meters ($m^3$) that are used to store VOL for which construction, reconstruction, or modification commenced after July 23, 1984. Blanco Compressor Station A is not subject to this regulation. [40 CFR 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. |

**Table for Applicable Federal Regulations:**

| Federal Regulation Citation | Title | Applies? Enter Yes or No | Unit(s) or Facility | Justification: |
|---|---|---|---|---|
| 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. |
| 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 | 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. |

**Table for Applicable Federal Regulations:**

| Federal Regulation Citation | Title | Applies? Enter Yes or No | Unit(s) or Facility | Justification: |
|---|---|---|---|---|
| | Reconstruction Commenced **After** September 18, 2015 and On or **Before** December 6, 2022 | | | |
| 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 | 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 December 6, 2022; 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 reciprocating internal combustion engine (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 | No | N/A | This regulation establishes standards of performance for GHG emissions for electric generating units. This regulation is not applicable because the facility does not contain any electric generating units. |

**Table for Applicable Federal Regulations:**

| Federal Regulation Citation | Title | Applies? Enter Yes or No | Unit(s) or Facility | Justification: |
|---|---|---|---|---|
| | 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 GHG emissions and compliance times for electric utility generating units. This regulation is not applicable because the facility does not contain any electric generating units. |
| 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 | N/A | NSPS 40 CFR 61 does not apply to the facility because the facility does not emit or have the triggering substances on site and 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** | No | N/A | This standard does not apply to this facility under routine operating conditions. In the case of asbestos demolition at the facility then Subpart M would apply. |

**Table for Applicable Federal Regulations:**

| Federal Regulation Citation | Title | Applies? Enter Yes or No | Unit(s) or Facility | Justification: |
|---|---|---|---|---|
| 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 HAP 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 HAP 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 Emissions Standards for Hazardous Air Pollutants (NESHAP) 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 [40 CFR 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 NESHAP from natural gas transmission and storage facilities. This facility does not have an affected source listed under 40 CFR 63.1270(b) and is therefore not subject to the requirements of this subpart. [40 CFR 63.1270(c)] |
| MACT 40 CFR 63 Subpart DDDDD | National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and | No | N/A | This regulation establishes the NESHAP 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. |

**Table for Applicable Federal Regulations:**

| Federal Regulation Citation | Title | Applies? Enter Yes or No | Unit(s) or Facility | Justification: |
|---|---|---|---|---|
| | Institutional Boilers & Process Heaters | | | |
| 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 NESHAP coal and oil fire electric utility steam generating units. This regulation does not apply because the facility does not have steam-generating units. |
| MACT 40 CFR 63 Subpart ZZZZ | National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (**RICE MACT**) | No | A-01 to 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 HAP 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** | No | N/A | This regulation defines compliance assurance monitoring (CAM). This facility has no units meeting the criteria of this part; specifically no emission units are controlled major sources.<br><br>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. |

**Table for Applicable Federal Regulations:**

| Federal Regulation Citation | Title | Applies? Enter Yes or No | Unit(s) or Facility | Justification: |
|---|---|---|---|---|
| 40 CFR 68 | **Chemical Accident Prevention** | No | N/A | Facility is regulated under Department of Transportation (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.<br><br>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 generates 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). |

**Table for Applicable Federal Regulations:**

| Federal Regulation Citation | Title | Applies? Enter Yes or No | Unit(s) or Facility | Justification: |
|---|---|---|---|---|
| Title VI – 40 CFR 82 | Protection of **Stratospheric Ozone** | No | N/A | EPNG owns appliances containing chlorofluorocarbons (CFC) 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. |
| Clean Air Act Section 112(r) | HAP 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)

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☑ **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 plans for mitigating emissions during startups, shutdowns, and emergencies and for minimizing emissions during routine or predictable startup, shutdown, and scheduled maintenance. These plans can be provided to the Department upon request.

# Section 15

## Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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**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.

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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 Compressor Station 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-M9, 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)

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

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**Compliance Test History Table**

| Unit No. | Test Description | Test Date |
|---|---|---|
| A-01 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 5/12/2020; 0 hours in 2021(not tested); 0 hours in 2022 (not tested); 0.75 hours in 2023 (not tested) |
| A-02 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 1.75 hours in 2021 (not tested); 7/26/2022; 3/28/2023 |
| A-03 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 108 hours in 2021 (not tested); 134.25 hours in 2022 (not tested); 3/28/2023 |
| A-04 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 5/4/2021; 7/26/2022; 1,419 hours in 2023 (not tested) |
| A-05 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 0 hours in 2021 (not tested); 2.25 hours in 2022 (not tested); 114.25 hours in 2023 (not tested); 0 hours in 2024 (not tested) |
| A-06 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 1,817 hours in 2022 (not tested); 403.75 hours in 2023 (not tested); 1,191 hours in 2024 (not tested) |
| A-07 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 5/12/2020; 1,946 hours in 2021 (not tested); 1,371 hours in 2022 (not tested); 11/8/2023 |
| A-08 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | Requested waiver in 2019 from testing requirements due to no gas in pipeline for A-08. |

## Compliance Test History Table

| Unit No. | Test Description | Test Date |
|---|---|---|
| A-09 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 5/13/2020; 5/4/2021; 4/19/2022; 125.5 hours in 2023 (not tested) |
| A-10 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | Requested waiver in 2019 from testing requirements due to no gas in pipeline for A-10. |
| A-11 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 5/13/2020; 5/5/2021; 4/20/2022; 3/29/2023 |
| A-12 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 217.3 hours in 2021 (not tested); 0.25 hours in 2022 (not tested); 0.25 hours in 2023 (not tested) |
| A-13 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 1,033 hours in 2021 (not tested); 12/6/2022; 3/29/2023 |
| A-14 | Testing in accordance with the Conditions of A314 in Permit P048-R4 (unless Condition B108D is met). | 0 hours in 2021 (not tested); 0.25 hours in 2022 (not tested); 0.75 hours in 2023 (not tested); 0.25 hours in 2024 (not tested) |

# Section 19

## Requirements for Title V Program

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

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**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 www.env.nm.gov/air-quality/air-quality-title-v-operating-permits-guidance-page/. 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.

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**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.

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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.

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**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 A308.B Permit P048-R4, 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.

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**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.

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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.

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

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

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Condition A308 of Operating Permit P048-R4 specifies that EPNG must submit compliance certification reports to the NMED Air Quality Bureau (AQB) and to the EPA by no later than January 30th of each year.

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## 19.5 - Stratospheric Ozone and Climate Protection

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

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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.

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## 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 www.env.nm.gov/air-quality/air-quality-title-v-operating-permits-guidance-page/. Sources that are subject to both the Title V and Acid Rain regulations are **encouraged** to submit both applications **simultaneously**.

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

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

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

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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).

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**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.)

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Colorado (32 km); Local Air Pollution Control Programs: none; Indian Tribes/Pueblos: Navajo Nation (24 km), Southern Ute (32 km), Ute Mountain (20 km), Jicarilla Apache Reservation (56 km)

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**19.9 - Responsible Official**

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

Responsible Official: Donald W. Perkins
Title: Director, Operations
Email: don_perkins@kindermorgan.com
Phone: 970-208-1268
Address: 2527 Foresight Circle, Grand Junction, CO 81505

Alternative Responsible Official: Ted Meinhold
Title: Vice President, Operations
Email: ted_meinhold@kindermorgan.com
Phone: 713-420-2765
Address: 1001 Louisiana Street, Suite 1000, Houston, TX 77002

# Section 20

## Other Relevant Information

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**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.

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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 6th day of September, 2024, upon my oath or affirmation, before a notary of the State of

Colorado.

*Signature

Date 9/6/2024

Donald W. Perkins
Printed Name

Director, Operations
Title

Scribed and sworn before me on this 6 day of September, 2024.

My authorization as a notary of the State of Colorado expires on the 16th day of February, 2028.

Notary's Signature

Date 9/6/2024

Notary's Printed Name

MEGAN RILEY NICHOLS
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20244007058
MY COMMISSION EXPIRES FEBRUARY 16, 2028

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