July 2, 2008

Jeff Robinson
Part 71 Permit Contact, Office of Air and Radiation
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: 40 CFR Part 71 Operating Permit Renewal Application, R6FOPP71-05
Williams Four Corners, LLC Ojito Compressor Station

Dear Mr. Page:

Enclosed please find 40 CFR Part 71 operating permit renewal application forms for Williams Four Corners, LLC Ojito Compressor Station located on the Jicarilla Apache Indian Reservation in New Mexico.

If you have any questions, or require additional information, please contact me at (801) 484-4412 or David Bays of Williams Four Corners, LLC at (505) 632-4951.

Sincerely,

Robert L. Myers II
Principal

c: David Bays (Williams Four Corners, LLC)

Enclosures

Cirrus Consulting
951 Diestel Road
Salt Lake City, Utah 84105

Tel: (801) 484-4412
Fax: (801) 484-4192
bmyers@cirrusllc.com

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION 6)
APPLICATION FOR FEDERAL OPERATING PERMIT
(40 CFR PART 71)

OJITO COMPRESSOR STATION

Submitted By:

WILLIAMS FOUR CORNERS, LLC
188 County Road 4900
Bloomfield, New Mexico 87413

Prepared By:

CIRRUS CONSULTING, LLC
951 S. Diestel Road
Salt Lake City, UT 84105

July 2008

List of Forms and Attachments

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Introduction

Williams Four Corners, LLC (Williams) is submitting this permit application to the Region 6 Environmental Protection Agency Air Permits Section to renew the Ojito Compressor Station Title V Operating Permit, R6FOPP71-05, issued January 20, 2004. No equipment changes are proposed in this renewal. Emission calculations have been updated using current versions of the applicable models; refer to the *emissions documentation section*

The table below identifies equipment permitted for operation at the facility.

Ojito Compressor Station Equipment List

Unit Number	Unit Description	Unit Number	Unit Description
1	Cooper Superior 8G825	T3*	Ambitrol Storage Tank (100 bbl)
2	Cooper Superior 8G825	T4*	Used Oil Storage Tank (50 gal)
3	Cooper Superior 8G825	T5*	Glycol Storage Tank (100 bbl)
4	Dehydrator Regenerator Vent (20 mmscfd)	T6-T7*	Water Storage Tank (100 bbl each)
5	Dehydrator Regenerator Vent (20 mmscfd)	T8*	Gasoline Storage Tank (210 bbl)
6	Dehydrator Regenerator Vent (20 mmscfd)	T9*	Lube Oil Storage Tank (300 gal)
7	Dehydrator Regenerator Vent (20 mmscfd)	T10*	On-road Diesel Storage Tank (500 gal)
8	Flare Stack	T11-T12	Condensate Storage Tank (100 bbl each)
9*	Emergency Generator	T13-T14*	Methanol Storage Tank (100 bbl each)
T1*	Used Oil Storage Tank (750 gal)	F-1	Fugitives: valves, pump seals, compressor seals, pressure relief valves, connectors, open ended valves
T2*	Used Oil Storage Tank (1000 gal)		

* Insignificant sources

FEDERAL RULES, REGULATIONS, AND STANDARDS APPLICABILITY CHECKLIST

Citation	Title	Applicable	Not Applicable
40 CFR 50	National Primary and Secondary Ambient Air Quality Standards	✓	
40 CFR 51	Requirements for Preparation, Adoption, and Submittal of Implementation Plans		✓
40 CFR 52	Approval and Promulgation of Implementation Plans		✓
40 CFR 60	Standards of Performance for New Stationary Sources		✓
40 CFR 61	National Emission Standards for Hazardous Air Pollutants		✓
40 CFR 63	National Emission Standards for Hazardous Air Pollutants for Source Categories	✓	
40 CFR 64	Compliance Assurance Monitoring		✓
40 CFR 68	Chemical Accident Prevention Provisions		✓
40 CFR 70	State Operating Permit Programs		✓
40 CFR 71	Federal Operating Permit Programs	✓	
40 CFR 72	Permits Regulation		✓
40 CFR 73	Sulfur Dioxide Allowance System		✓
40 CFR 75	Continuous Emission Monitoring		✓
40 CFR 76	Acid Rain Nitrogen Dioxide Emission Reduction Program		✓
40 CFR 77	Excess Emissions		✓
40 CFR 78	Appeal Procedures for Acid Rain Program		✓
40 CFR 82	Protection of Stratospheric Ozone		✓
40 CFR 89	Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines		✓
40 CFR 90	Control of Emissions from Nonroad Spark-Ignition Engines		✓
40 CFR 91	Control of Emissions from Marine Spark-Ignition Engines		✓
40 CFR 92	Control of Air Pollution from Locomotives and Locomotive Engines		✓
40 CFR 93	Determining Conformity of Federal Actions to State and Federal SIPs		✓
40 CFR 94	Control of Air Pollution from Marine Compressor-Ignition Engines		✓
40 CFR 95	Mandatory Patent Licenses		✓
40 CFR 96	NOx Budget Trading Program for State Implementation Plans		✓
40 CFR 97	Federal NOx Budget Trading Program		✓

40 CFR 50, *National Primary and Secondary Ambient Air Quality Standards*, is applicable because it applies to all sources operating within the State of New Mexico including those located on Indian lands.

40 CFR 51, *Requirements for Preparation, Adoption, and Submittal of Implementation Plans*, is not applicable because it applies only to local and state/tribal governmental agencies.

40 CFR 52, *Approval and Promulgation of Implementation Plans*, is not applicable because the station is not a major PSD source (40 CFR 52.21 *Prevention of Significant Deterioration of Air Quality*). The remainder of 40 CFR 52 is not applicable because it addresses approval and promulgation of implementation plans.

40 CFR 60, *Standards of Performance for New Stationary Sources*, is not applicable because no Subparts apply.

Subpart A, *General Provisions*, is not applicable.

40 CFR 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generator for Which Construction Commenced After August 17, 1971,* is not applicable because the boilers at the station do not have heat input rates greater than 250 MMBtu/hr.

40 CFR 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978,* is not applicable because the boilers at the station are not electric steam generating units as defined by the subpart and do not have a heat input rates greater than 250 MMBtu/hr.

40 CFR 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units,* is not applicable because the boilers at the station do not have heat inputs rates greater than 100 MMBtu/hr.

40 CFR 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units,* is not applicable because the boilers at the station were not constructed, reconstructed or modified after June 9, 1989 and/or do not have maximum design heat input capacities greater than 10 MMBtu/hr.

Subpart Dc Applicability Table

Unit Number	Construction, Modification or Reconstruction Date	Equipment Description	Maximum Design Heat Input Capacity (MMBtu/hr)	Construction, Reconstruction or Modification After June 9, 1989 and Capacity Greater Than 10 MMBtu/hr
4	11/98	Reboiler	1.5	No
5	11/98	Reboiler	1.5	No
6	11/98	Reboiler	1.5	No
7	11/98	Reboiler	1.5	No

Subpart K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978,* is not applicable because all storage tanks at the facility have capacities less than the minimum applicability threshold capacity of 40,000 gallons (see 40 CFR 60.110(a)).

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,* is not applicable because all storage tanks at the facility have capacities less than the minimum applicability threshold capacity of 40,000 gallons (see 40 CFR 60.110a(a)).

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,* is not applicable to any storage tank at the facility. Storage tanks at the facility have a capacity less than the minimum applicability threshold capacity of 75 cubic meters (19,813 gallons); do not contain volatile organic liquids, and /or are located prior to custody transfer.

Subpart GG, *Standards of Performance for Stationary Gas Turbines*, is not applicable.

Subpart KKK, *Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants,* is not applicable because the facility is not a natural gas processing plant.

Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*, is not applicable because the engines currently located at the station were constructed before the applicability date of June 13, 2006 (see the construction dates provided in Section 5 of the application form).

Subpart KKKK, *Standards of Performance for Stationary Gas Turbines*, is not applicable because there are no turbines installed after the applicability date of February 18, 2005 at the station.

No other regulations promulgated under 40 CFR 60 are applicable to the facility.

40 CFR 61, *National Emission Standards for Hazardous Air Pollutants*, is not applicable as the facility is not subject to any of the standards listed.

40 CFR 63, *National Emission Standards for Hazardous Air Pollutants for Source Categories*, is applicable.

Subpart A, *General Provisions*, is applicable because Subpart HH applies.

Subpart HH, *National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities*, is applicable as the facility contains affected sources (glycol dehydrators). The Ojito Compressor Station is an area source of HAPs as defined by Subpart HH. The dehydrators are not located within an Urban Area plus offset or within an Urban Cluster as defined by the amended regulation, and have actual annual average benzene emissions less than 0.90 megagrams per year (1 tpy). Thus, as per 63.764(e)(1)(ii), these units are exempt from the control and monitoring, recordkeeping and reporting requirements of 63.764(d). Benzene emissions are to be determined in accordance with the procedures in 63.772(b)(2).

Subpart HHH, *National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities,* is not applicable because the station is not a natural gas transmission or storage facility.

Subpart YYYY, *National Emission Standards for Hazardous Air Pollutants From Stationary Combustion Turbines,* is not applicable as the facility is an area source as defined by this subpart.

Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, is not applicable. The station is not a major HAP source as defined by the regulation and the engines were installed prior to the applicability date of December 19, 2002.

40 CFR 64, *Compliance Assurance Monitoring*, is not applicable because none of the sources at the station meet the following criteria.

> CAM applies to pollutant-specific emission units located at a major source that is subject to Part 70 or Part 71. Ojito is subject to Part 71 because it is a synthetic minor source that requires a Part 71 permit to provide federally enforceable requirements for affected emission units and their emission control equipment. CAM does not apply to the engines or dehydrators since the facility is not a major source.

40 CFR 68, *Chemical Accident Prevention Provisions*, is not applicable because the station does not store any of the identified toxic and flammable substances in quantities exceeding the applicability thresholds.

40 CFR 70, *State Operating Permit Programs*, is not applicable because the facility is located within the boundaries of the Jicarilla Apache Indian Reservation. As such, the EPA has jurisdiction over this facility until the Jicarilla Apache Indian Tribe develops their own rules and regulations.

40 CFR 71, *Federal Operating Permit Programs*, is applicable because the facility is located within the Jicarilla Apache Indian Reservation, and as the Tribe has not developed their own rules and regulations concerning air emission sources, the facility is presently under the jurisdiction of the EPA. As CO emissions exceed 100 tons per year, the station is subject to the Federal Operating Permits Program.

40 CFR 72, *Permits Regulation*, is not applicable because the station does not operate a source subject to Title IV of the CAA.

The purpose of Title IV of the 1990 CAA is to reduce the adverse effects of acid deposition that results from the release of acidic compounds and their precursors during the combustion of fossil fuels. In general, the Acid Deposition Control Program consists of 40 CFR 72, 73, 75, 76, 77, and 78. None of these are applicable because the station does not operate a source subject to Title IV of the CAA.

40 CFR 73, *Sulfur Dioxide Allowance System*, is not applicable because the station does not operate a source subject to Title IV of the CAA.

40 CFR 75, *Continuous Emission Monitoring*, is not applicable because the station does not operate a source subject to Title IV of the CAA.

40 CFR 76, *Acid Rain Nitrogen Dioxide Emission Reduction Program*, is not applicable because the station does not operate a source subject to Title IV of the CAA.

40 CFR 77, *Excess Emissions*, is not applicable because the station does not operate a source subject to Title IV of the CAA.

40 CFR 78, *Appeal Procedures for Acid Rain Program*, is not applicable because the station does not operate a source subject to Title IV of the CAA.

40 CFR 82, *Protection of Stratospheric Ozone*, is not applicable because the station does not produce, manufacture, transform, destroy, import, or export ozone-depleting substances; does not maintain or service motor vehicle air conditioning units or refrigeration equipment; and does not sell, distribute, or offer for sale or distribution any product that contains ozone-depleting substances.

40 CFR 89, *Control of Emissions from New and In-Use Nonroad Compression-Ignition Engines*, is not applicable as there are no compression-ignition nonroad engines at the facility.

40 CFR 90, *Control of Emissions from Nonroad Spark-Ignition Engines*, is not applicable as the engines at the facility are stationary units. Consistent with the Clean Air Act, stationary-source engines are not non-road engines, so this regulation is not applicable.

40 CFR 91, *Control of Emissions from Marine Spark-Ignition Engines*, is not applicable none of the engines at the facility are used to propel marine vessels as defined in the General Provisions of the United States Code, 1 U.S.C.3 (1992).

40 CFR 92, *Control of Air Pollution from Locomotives and Locomotive Engines*, is not applicable because there are no locomotives or locomotive engines at the station.

40 CFR 93, *Determining Conformity of Federal Actions to State and Federal SIPs*, is not applicable because the station is not associated with any highway or transit projects.

40 CFR 94, *Control of Emissions from Marine Compression-Ignition Engines*, is not applicable because none of the engines at the facility are used to propel marine vessels as defined in the General Provisions of the United States Code, 1 U.S.C.3 (1992).

40 CFR 95, *Mandatory Patent Licenses*, is not applicable because there are no patent licenses for the station.

40 CFR 96, *NOx Budget Trading Program for State Implementation Plans*, is not applicable because New Mexico is not one of the affected states.

40 CFR 97, *Federal NOx Budget Trading Program*, is not applicable because New Mexico is not one of the affected states.

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name: Ojito Compressor Station

Mailing address: Street or P.O. Box: 188 County Road 4900

City: Bloomfield State: NM ZIP: 87413

Contact person: David Bays Title: Sr. Environmental Specialist

Telephone (505) 632 - 4951 Ext. _____

Facsimile (505) 632 - 4781

B. Facility Location

Temporary source? ___Yes X No Plant site location: Township 26 North, Range 3 West, Section 7 on the Jicarilla Apache Indian Reservation (approximately 303,680 meters Easting and 4,042,200 meters Northing

City approximately 10 miles NW of Gavilan State NM County Rio Arriba EPA Region 6

Is the facility located within:

Indian lands? X YES ___ NO OCS waters? ___YES X NO

Non-attainment area? ___ YES X NO If yes, for what air pollutants? _____

Within 50 miles of affected State? X YES __ NO If yes, What State(s)? CO

C. Owner

Name Williams Street/P.O. Box One Williams Center

City Tulsa State OK ZIP 74172

Telephone (918) 588-2984 Ext_____

D. Operator

Name Williams Four Corners, LLC Street/P.O. Box 188 County Road 4900

City Bloomfield State NM ZIP 87413

Telephone (505) 632-4951 Ext_____

E. Application Type

Mark only one permit application type and answer the supplementary question appropriate for the type marked.

___Initial Permit X_ Renewal ___ Significant Mod ___ Minor Permit Mod(MPM)

___ Group Processing, MPM ___ Administrative Amendment

For initial permits, when did operations commence? _____/_____/_____

For permit renewal, what is the expiration date of current permit? 1/19/2009

F. Applicable Requirement Summary

Mark all types of applicable requirements that apply.

___ SIP X_ FIP/TIP ___ PSD ___Non-attainment NSR

___ Minor source NSR ___ Section 111 ___ Phase I acid rain ___Phase II acid rain

___ Stratospheric ozone ___ OCS regulations X_NESHAP ___ Sec. 112(d) MACT

___ Sec. 112(g) MACT ___ Early reduction of HAP ___ Sec 112(j) MACT ___ RMP [Sec.112(r)]

___ Tank Vessel requirements, sec. 183(f)) ___ Section 129 Standards/Requirement

___ Consumer / comm.. products, • 183(e) ___ NAAQS, increments or visibility (temp. sources)

Has a risk management plan been registered? ___YES X_ NO Regulatory agency _____

Phase II acid rain application submitted? ___YES X_ NO If yes, Permitting authority _____

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

Table 2: Potential to Emit in Pounds per Hour /Tons per Year
Condition 3.2.1: quarterly monitoring of pollution control equipment
Condition 3.2.2: limits on amount of natural gas burned in equipment
Condition 3.2.3: maximum design heat input for engines
Condition 3.2.4: record all repair and maintenance activities
Condition 3.2.5: record fuel usage
Condition 3.2.6: maintain records of fuel usage
Condition 3.2.7: record serial numbers
Condition 3.2.8: retain records
Condition 3.2.9: semi-annual report requirements

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Natural gas compression	Natural gas	1389
Natural gas dehydration	Natural gas	1389

I. Emission Unit Identification

Assign an emissions unit ID and describe each emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should by listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
1	Cooper Superior 8G825 800 hp Internal Combustion Compressor Engine
2	Cooper Superior 8G825 800 hp Internal Combustion Compressor Engine
3	Cooper Superior 8G825 800 hp Internal Combustion Compressor Engine
4	PESCO (or equivalent) 20 MMCFD Dehydrator Regenerator Vent
5	PESCO (or equivalent) 20 MMCFD Dehydrator Regenerator Vent
6	PESCO (or equivalent) 20 MMCFD Dehydrator Regenerator Vent
7	PESCO (or equivalent) 20 MMCFD Dehydrator Regenerator Vent
8	Flare Stack
T-11	4200 gal Condensate Storage Tank
T-12	4200 gal Condensate Storage Tank

J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

NOx 36.41 tons/yr VOC 56.31 tons/yr SO2 0 tons/yr

PM-10 0 tons/yr CO 78.48 tons/yr Lead 0 tons/yr

Total HAP 13.4 tons/yr

Single HAP emitted in the greatest amount Toluene PTE 4.7 tons/yr

Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE NA tons/yr

K. Existing Federally-Enforceable Permits

Permit number(s) R6FOPP71-05 Permit type Part 71 Permitting authority US EPA

L. Emission Unit(s) Covered by General Permits

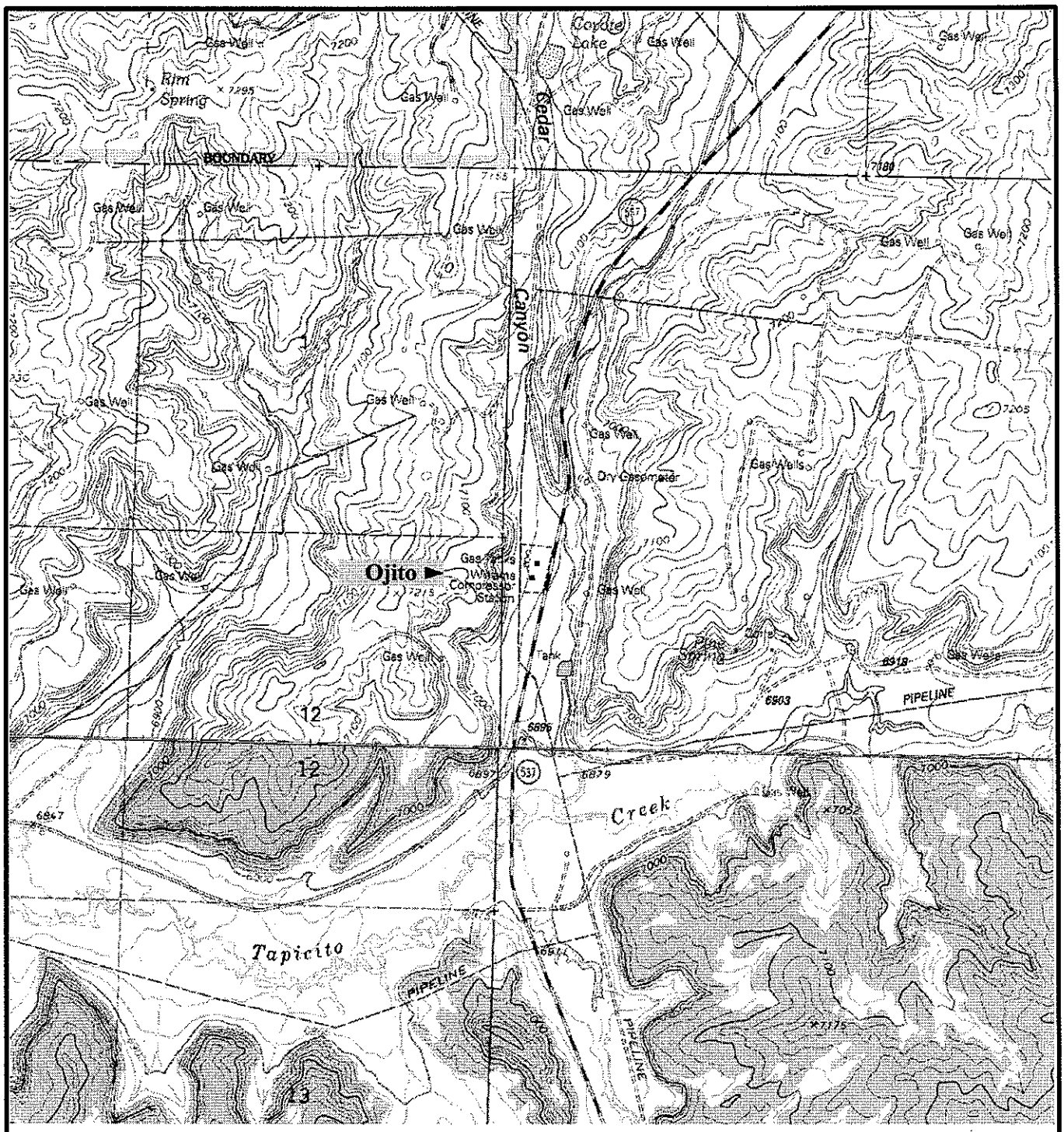
Emission unit(s) subject to general permit Not applicable

Check one: ___ Application made ___ Coverage granted

General permit identifier _____ Expiration Date ____/____/____

M. Cross-referenced Information

Does this application cross-reference information? ___ YES X NO (If yes, see instructions)



Source: USGS Pine Lake and Schmitz Ranch, NM Quadrangles

0 2000
Scale (Feet)

Williams

Figure 1 Site Vicinity / Topographic Map

Ojito Compressor Station

Sections 6 & 7, Township 26N Range 3W

Rio Arriba County, New Mexico

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

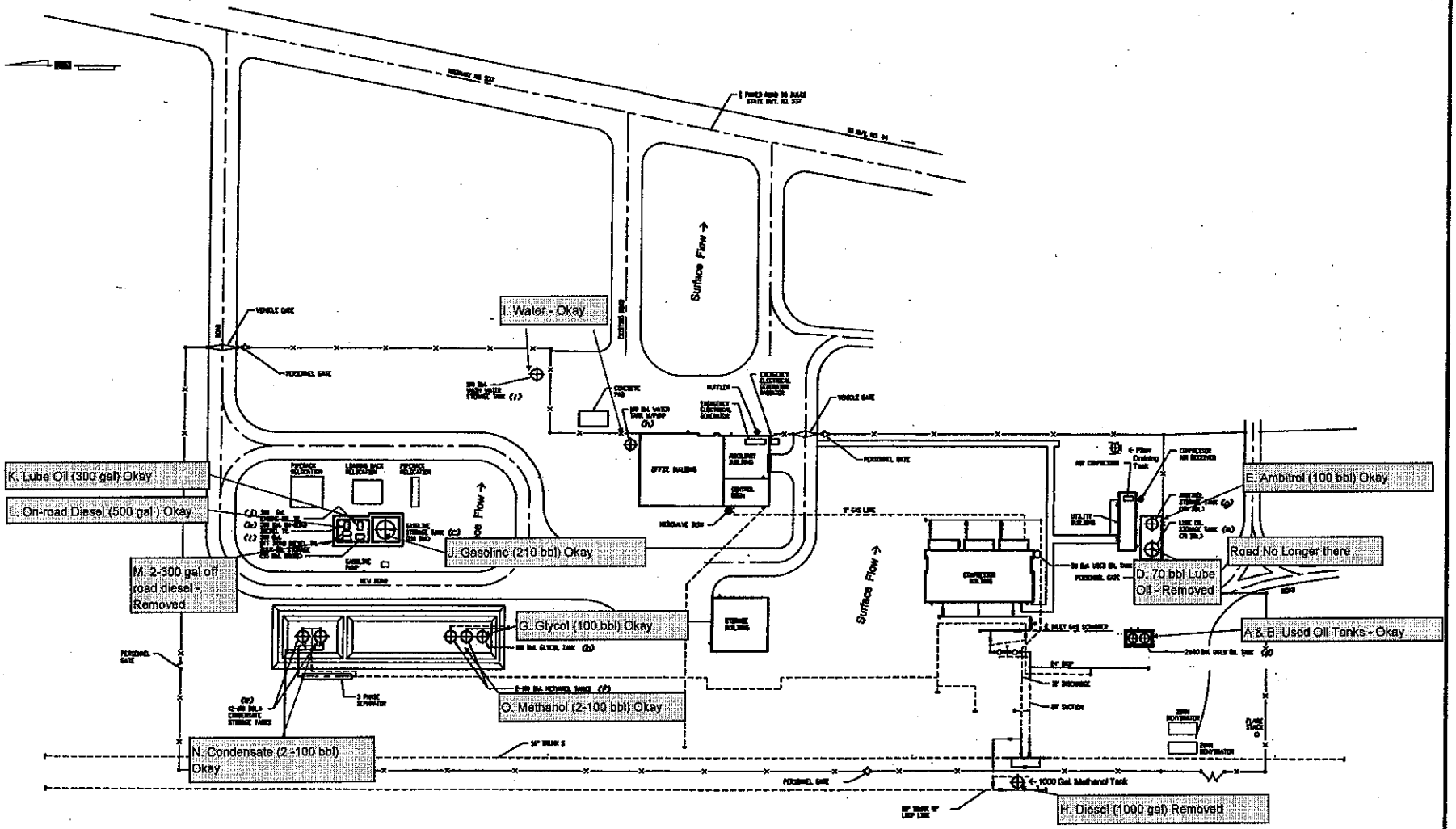
ATTACHMENT "A" PRODUCT& WASTE STORAGE LOCATIONS

OPERATIONS

DJITO COMPRESSOR STATION

SPILL PREVENTION CONTROL | Tab 13 | Document No. 42-13-001

10-14-97 | Revision Date 02 | Page No. 3 of 8



LEGEND

REFERENCE DRAWINGS

REVISIONS

DRAFTING	BY	DATE
	KS	04/15/97
CHECKED		
APPROVED		
ENGINEERING	BY	DATE
FIELD APPROVED		

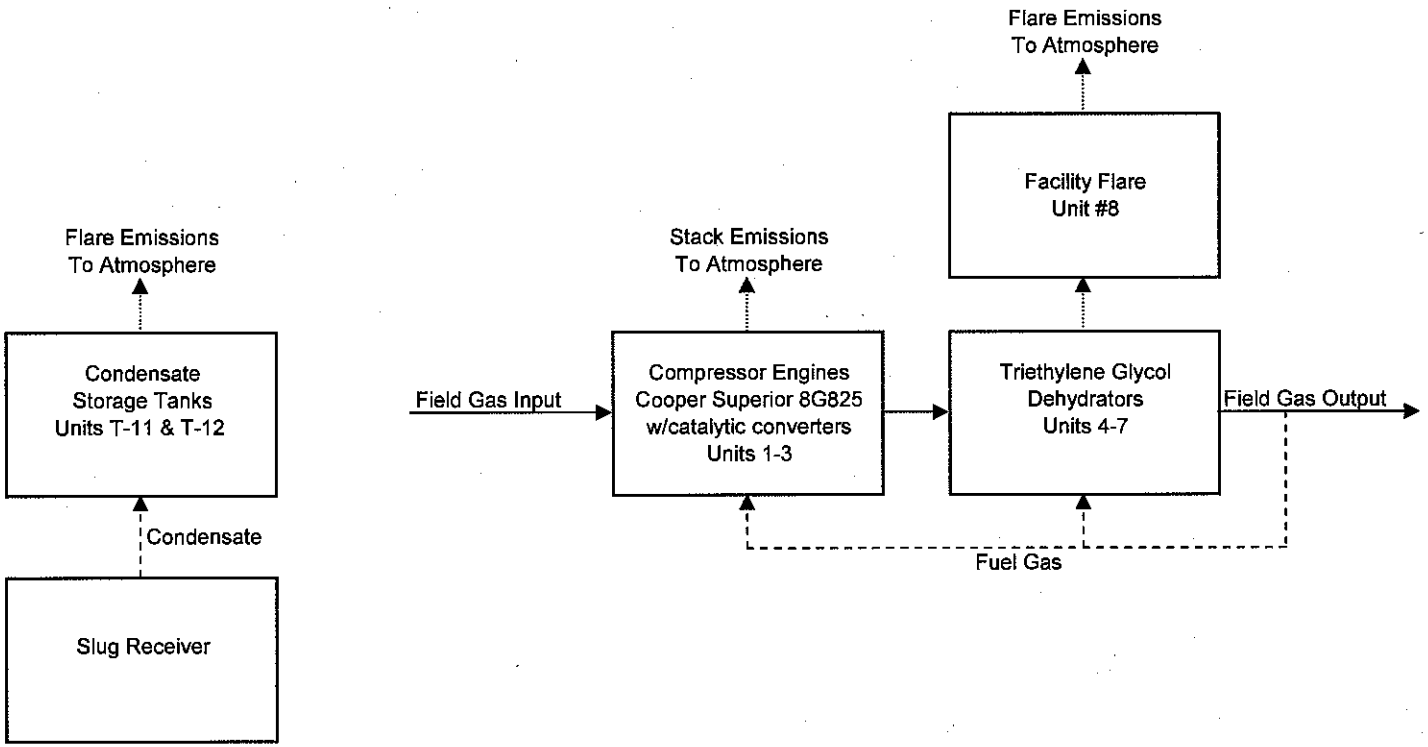
WILLIAMS GAS PROCESSING

DJITO COMPRESSOR STATION
PLOT PLAN
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
RIO ARRIBA, NEW MEXICO

SCALE: NONE | DRAWN BY: | DRAWING NO. SPCC1-1_CONT | REV.

Williams Four Corners LLC

Ojito Compressor Station - Flow Diagram of Operations



EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID 1 Description: Cooper Superior 8G825 Internal Combustion Compressor Engine

SIC Code (4-digit) 1389 SCC Code 31000203

B. Emissions Unit Description

Primary use Compressor Drive Temporary Source ___Yes X No

Manufacturer Cooper Superior Model No. 8G825

Serial Number 27519 Installation Date 11/99*

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input NA MM BTU/hr Max. Design Heat Input 8.1 MM BTU/hr

* Like-kind replacement engine installed November 1999. Original unit installed November 1969.

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) Not applicable

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas	Negligible	Negligible	1,100 Btu/cf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	NA	7,366 scf/hr	64.5 mmcf/yr

E. Associated Air Pollution Control Equipment

Emissions unit ID 1 Device type Catalytic Converter (and Miratech AFR controller)

Air pollutant(s) Controlled NOx, CO, and VOC Manufacturer Miratech*

Model No. FP10201252 Serial No. 101576

Installation date 01/ 98 Control efficiency (%) NOx – 90%, CO – 80%, VOC – 50%

Efficiency estimation method Manufacturer's Data

*A Miratech catalytic converter was installed to replace the Waukesha Pierce catalytic converter.

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____.____ Inside stack diameter (ft) _____.____

Stack temp(°F) _____.____ Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) _____.____ Velocity (ft/sec) _____.____

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID 2 Description: Cooper Superior 8G825 Internal Combustion Compressor Engine

SIC Code (4-digit) 1389 SCC Code 31000203

B. Emissions Unit Description

Primary use Compressor Drive Temporary Source ___Yes X No

Manufacturer Cooper Superior Model No. 8G825

Serial Number 19844 Installation Date 11/69 replaced 7/07

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input NA MM BTU/hr Max. Design Heat Input 8.1 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) Not applicable

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas	Negligible	Negligible	1,100 Btu/cf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	NA	7,366 scf/hr	64.5 mmcf/yr

E. Associated Air Pollution Control Equipment

Emissions unit ID 2 Device type Catalytic Converter (and Miratech AFR controller)

Air pollutant(s) Controlled NOx, CO, and VOC Manufacturer Miratech

Model No. SP105201201 Serial No. 101534

Installation date 01/98 Control efficiency (%) NOx – 90%, CO – 80%, VOC – 50%

Efficiency estimation method Manufacturer's Data

*A Miratech catalytic converter was installed to replace the Waukesha Pierce catalytic converter.

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____.____ Inside stack diameter (ft) _____.____

Stack temp(°F) _____.____ Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) _____.____ Velocity (ft/sec) _____.____

INSTRUCTIONS FOR EUD-1

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID 3 Description: Cooper Superior 8G825 Internal Combustion Compressor Engine

SIC Code (4-digit) 1389 SCC Code 31000203

B. Emissions Unit Description

Primary use Compressor Drive Temporary Source ___Yes X No

Manufacturer Cooper Superior Model No. 8G825

Serial Number 19835 Installation Date 03/94

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input NA MM BTU/hr Max. Design Heat Input 8.1 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) Not applicable

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas	Negligible	Negligible	1,100 Btu/cf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	NA	7,366 scf/hr	64.5 mmcf/yr

E. Associated Air Pollution Control Equipment

Emissions unit ID 3 Device type Catalytic Converter (and Miratech AFR controller)

Air pollutant(s) Controlled NOx, CO, and VOC Manufacturer Miratech*

Model No. SP10S2012C1 Serial No. 101521

Installation date 01/98 Control efficiency (%) NOx – 90%, CO – 80%, VOC – 50%

Efficiency estimation method Manufacturer's Data

*A Miratech catalytic converter was installed to replace the Waukesha Pierce catalytic converter.

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____.____ Inside stack diameter (ft) _____.____

Stack temp(°F) _____.____ Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) _____.____ Velocity (ft/sec) _____.____

United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID 4 (Field ID: Dehy 1, East Dehy)
Description Triethylene Glycol (TEG) Dehydrator Regenerator Vent

SIC Code (4-digit) 1389 SCC Code 31000301

B. Emissions Unit Description

Primary use or equipment type Removal of water from natural gas

Manufacturer PESCO Model No. B-154

Serial No. 101637 Installation date 11/98

Raw materials Natural Gas

Finished products Natural Gas

Temporary source: X No ___Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	NA	NA
Maximum rate	0.833 MMSCF	7,300 MMSCF

D. Associated Air Pollution Control Equipment

Emissions unit ID 8 Device Type Flare

Manufacturer PESCO Model No B-326

Serial No. 5906 Installation date 11/98

Control efficiency (%) 98% Capture efficiency (%) 100%

Air pollutant(s) controlled VOC and HAPs Efficiency estimation method AP-42

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common)).

Stack height (ft) _____._____ Inside stack diameter (ft) _____._____

Stack temp (F) _____._____ Design stack flow rate (ACFM) _____._____

Actual stack flow rate (ACFM) _____._____ Velocity (ft/sec) _____._____

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID 5 (Field ID: Dehy 2, West Dehy)
Description Triethylene Glycol (TEG) Dehydrator Regenerator Vent

SIC Code (4-digit) 1389 SCC Code 31000301

B. Emissions Unit Description

Primary use or equipment type Removal of water from natural gas

Manufacturer PESCO Model No. B-154

Serial No. 101636 Installation date 11/98

Raw materials Natural Gas

Finished products Natural Gas

Temporary source: X No ___Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	NA	NA
Maximum rate	0.833 MMSCF	7,300 MMSCF

D. Associated Air Pollution Control Equipment

Emissions unit ID 8 Device Type Flare

Manufacturer PESCO Model No B-326

Serial No. 5906 Installation date 11/98

Control efficiency (%) 98% Capture efficiency (%) 100%

Air pollutant(s) controlled VOC and HAPs Efficiency estimation method AP-42

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common)).

Stack height (ft) _____._____ Inside stack diameter (ft) _____._____

Stack temp (F) _____._____ Design stack flow rate (ACFM) _____._____

Actual stack flow rate (ACFM) _____._____ Velocity (ft/sec) _____._____

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EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID 6 Description Triethylene Glycol (TEG) Dehydrator Regenerator Vent

SIC Code (4-digit) 1389 SCC Code 31000301

B. Emissions Unit Description

Primary use or equipment type Removal of water from natural gas

Manufacturer PESCO Model No. B-154

Serial No. N/A Installation date Not currently installed.

Raw materials Natural Gas

Finished products Natural Gas

Temporary source: X No ___Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	N/A	N/A
Maximum rate	0.833 MMSCF	7,300 MMSCF

D. Associated Air Pollution Control Equipment

Emissions unit ID 8 Device Type Flare

Manufacturer PESCO Model No B-326

Serial No. 5906 Installation date 11/98

Control efficiency (%) 98% Capture efficiency (%) 100%

Air pollutant(s) controlled VOC and HAPs Efficiency estimation method AP-42

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common)).

Stack height (ft) _____._____ Inside stack diameter (ft) _____._____

Stack temp (F) _____._____ Design stack flow rate (ACFM) _____._____

Actual stack flow rate (ACFM) _____._____ Velocity (ft/sec) _____._____

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR PROCESS SOURCES (EUD-3)

A. General Information

Emissions unit ID 7 Description Triethylene Glycol (TEG) Dehydrator Regenerator Vent

SIC Code (4-digit) 1389 SCC Code 31000301

B. Emissions Unit Description

Primary use or equipment type Removal of water from natural gas

Manufacturer PESCO Model No. B-154

Serial No. N/A Installation date Not currently installed.

Raw materials Natural Gas

Finished products Natural Gas

Temporary source: X No ___Yes

C. Activity or Production Rates

Activity or Production Rate	Amount/Hour	Amount/Year
Actual Rate	N/A	N/A
Maximum rate	0.833 MMSCF	7,300 MMSCF

D. Associated Air Pollution Control Equipment

Emissions unit ID 8 Device Type Flare

Manufacturer PESCO Model No B-326

Serial No. 5906 Installation date 11/98

Control efficiency (%) 98% Capture efficiency (%) 100%

Air pollutant(s) controlled VOC and HAPs Efficiency estimation method AP-42

E. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (This is not common)).

Stack height (ft) _____._____ Inside stack diameter (ft) _____._____

Stack temp (F) _____._____ Design stack flow rate (ACFM) _____._____

Actual stack flow rate (ACFM) _____._____ Velocity (ft/sec) _____._____

EPA United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID 8 Description: Flare

SIC Code (4-digit) 1389 SCC Code_____

B. Emissions Unit Description

Primary use Control of dehydrator regenerator vent VOC emissions Temporary Source __Yes X No

Manufacturer PESCO Model No. B-326

Serial Number 5906 Installation Date 11/98

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input NA MM BTU/hr Max. Design Heat Input 5.52 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Regenerator Overhead Stream Standby fuel type(s) Not applicable

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Regenerator Overhead Stream	Negligible	Negligible	542.92 Btu/cf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Regenerator Overhead Stream	NA	10,160 scf/hr	89.0 mmcf/yr

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date _____ Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____._____ Inside stack diameter (ft) _____._____

Stack temp(°F) _____._____ Design stack flow rate (ACFM) _____._____

Actual stack flow rate (ACFM) _____._____ Velocity (ft/sec) _____._____

EPA United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSIONS UNIT DESCRIPTION FOR VOC EMITTING SOURCES (EUD-2)

A. General Information

Emissions unit ID T-11 Description 4200 gal Condensate Storage Tank

SIC Code (4-digit) 1389 SCC Code 40400311

B. Emissions Unit Description

Equipment type Fixed-roof Storage Tank. Temporary source: ___Yes X No

Manufacturer American Tank & Steel Model No. N-5169

Serial No. N-5169 Installation date: 1976

Articles being coated or degreased: NA

Application method NA

Overspray (surface coating) (%)NA Drying method NA

No. of dryers NA Tank capacity (degreasers) (gal) NA

C. Associated Air Pollution Control Equipment – N/A

Emissions unit ID _____ Device Type_____

Manufacturer _____ Model No_____

Serial No. _____ Installation date ____/____/_____

Control efficiency (%) _____.___ Capture efficiency (%) _____.___

Air pollutant(s) controlled_____ Efficiency estimation method _____

D. Ambient Impact Assessment – N/A

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____.____ Inside stack diameter (ft) _____.____

Stack temp (F) _____.____ Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____.____

E. VOC-containing Substance Data

List each VOC-containing substance consumed, processed or produced at the emissions unit that is emitted into the air. In the name column, if providing a brand name, include the name of the manufacture; if the substance contains HAP, list the constituent HAP.

Substance Name (Chemical, Brand Name)	CAS No.	Substance Type	Actual Usage (gal/yr)	Max Usage (gal/day)	Max Usage (gal/year)	VOC Content (lb/gal)
Natural Gas Condensate	N/A	Natural Gas Condensate	NA	126	23100	*

Note: *See emission calculation sheet (Appendix A)

EPA United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSIONS UNIT DESCRIPTION FOR VOC EMITTING SOURCES (EUD-2)

A. General Information

Emissions unit ID T-12 Description 4200 gal Condensate Storage Tank

SIC Code (4-digit) 1389 SCC Code 40400311

B. Emissions Unit Description

Equipment type Fixed-roof Storage Tank. Temporary source: ___Yes X No

Manufacturer American Tank & Steel Model No. S-5168

Serial No. S-5168 Installation date: 1976

Articles being coated or degreased: NA

Application method NA

Overspray (surface coating) (%)NA Drying method NA

No. of dryers NA Tank capacity (degreasers) (gal) NA

C. Associated Air Pollution Control Equipment – N/A

Emissions unit ID _____ Device Type_____

Manufacturer _____ Model No_____

Serial No. _____ Installation date ____/____/_____

Control efficiency (%) _____.___ Capture efficiency (%) _____.___

Air pollutant(s) controlled_____ Efficiency estimation method _____

D. Ambient Impact Assessment – N/A

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____.____ Inside stack diameter (ft) _____.____

Stack temp (F) _____.____ Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____.____

E. VOC-containing Substance Data

List each VOC-containing substance consumed, processed or produced at the emissions unit that is emitted into the air. In the name column, if providing a brand name, include the name of the manufacture; if the substance contains HAP, list the constituent HAP.

Substance Name (Chemical, Brand Name)	CAS No.	Substance Type	Actual Usage (gal/yr)	Max Usage (gal/day)	Max Usage (gal/year)	VOC Content (lb/gal)
Natural Gas Condensate	N/A	Natural Gas Condensate	NA	126	23100	*

Note: *See emission calculation sheet (Appendix A)

EPA United States Environmental Protection Agency

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EMISSIONS UNIT DESCRIPTION FOR VOC EMITTING SOURCES (EUD-2)

A. General Information

Emissions unit ID F-1 Description Piping Component Fugitive Emissions

SIC Code (4-digit) 1389 SCC Code 31088811

B. Emissions Unit Description

Equipment type Valves, Flanges, Seals, etc. Temporary source: ___Yes X No

Manufacturer Unknown Model No. Unknown

Serial No. Unknown Installation date: Unknown

Articles being coated or degreased: NA

Application method NA

Overspray (surface coating) (%)NA Drying method NA

No. of dryers NA Tank capacity (degreasers) (gal) NA

C. Associated Air Pollution Control Equipment – N/A

Emissions unit ID _____ Device Type_____

Manufacturer _____ Model No_____

Serial No. _____ Installation date ____/____/_____

Control efficiency (%) _____.___ Capture efficiency (%) _____.___

Air pollutant(s) controlled_____ Efficiency estimation method _____

D. Ambient Impact Assessment – N/A

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____.____ Inside stack diameter (ft) _____.____

Stack temp (F) _____.____ Design stack flow rate (ACFM) _____.____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____.____

E. VOC-containing Substance Data

List each VOC-containing substance consumed, processed or produced at the emissions unit that is emitted into the air. In the name column, if providing a brand name, include the name of the manufacture; if the substance contains HAP, list the constituent HAP.

Substance Name (Chemical, Brand Name)	CAS No.	Substance Type	Actual Usage (gal/yr)	Max Usage (gal/day)	Max Usage (gal/year)	VOC Content (lb/gal)
Natural Gas	N/A	Natural Gas	N/A	N/A	N/A	*

Note: *See fugitive emission calculation sheet for composition (Appendix C)

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INSIGNIFICANT EMISSIONS (IE)

List each insignificant activity or emission unit. In the "number" column, indicate the number of units in this category. Descriptions should be brief but unique. Indicate which emissions criterion of part 71 is the basis for the exemption.

Number	Description of Activities or Emissions Units	RAP, except HAP	HAP
1	Used Oil Storage Tank (750 gal)	X	X
1	Used Oil Storage Tank (1000 gal)	X	X
1	Ambitrol Storage Tank (100 bbl)	X	X
1	Used Oil Storage Tank (50 gal)	X	X
1	Glycol Storage Tank (100 bbl)	X	X
2	Water Storage Tank (2@ 100 bbl)	X	X
1	Gasoline Storage Tank (210 bbl)	X	X
1	Lubrication Oil Storage Tank (300 gal)	X	X
1	On-road Diesel Storage Tank (500 gal)	X	X
2	Methanol Storage Tank (2@100 bbl)	X	X
1	Emergency Generator (180 hp)	X	X
4	Dehydrator Reboilers (associated with Units 4-7)	X	X

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID _____1_____

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM10	NA	Negligible	Negligible	
SO2	NA	Negligible	Negligible	
NOx	NA	2.65	11.59	
CO	NA	5.29	23.18	
VOC	NA	0.99	4.35	
Formaldehyde	NA	0.1	0.3	50000
Methanol	NA	0.1	0.1	67561
Benzene	NA	0.1	0.2	71432
Toluene	NA	0.1	0.1	108883

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 2

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM10	NA	Negligible	Negligible	
SO2	NA	Negligible	Negligible	
NOx	NA	2.65	11.59	
CO	NA	5.29	23.18	
VOC	NA	0.99	4.35	
Formaldehyde	NA	0.1	0.3	50000
Methanol	NA	0.1	0.1	67561
Benzene	NA	0.1	0.2	71432
Toluene	NA	0.1	0.1	108883

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 3

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM10	NA	Negligible	Negligible	
SO2	NA	Negligible	Negligible	
NOx	NA	2.65	11.59	
CO	NA	5.29	23.18	
VOC	NA	0.99	4.35	
Formaldehyde	NA	0.1	0.3	50000
Methanol	NA	0.1	0.1	67561
Benzene	NA	0.1	0.2	71432
Toluene	NA	0.1	0.1	108883

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 4

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	NA	1.06	4.64	
Benzene	NA	0.2	0.7	71432
Toluene	NA	0.3	1.1	108883
Xylene	NA	0.1	0.5	1330207
Hexane	NA	0.1	0.1	110543
Ethylbenzene	NA	0.1	0.1	100414

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 5

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	NA	1.06	4.64	
Benzene	NA	0.2	0.7	71432
Toluene	NA	0.3	1.1	108883
Xylene	NA	0.1	0.5	1330207
Hexane	NA	0.1	0.1	110543
Ethylbenzene	NA	0.1	0.1	100414

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 6

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC		1.06	4.64	
Benzene		0.2	0.7	71432
Toluene		0.3	1.1	108883
Xylene		0.1	0.5	1330207
Hexane		0.1	0.1	110543
Ethylbenzene		0.1	0.1	100414

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 7

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC		1.06	4.64	
Benzene		0.2	0.7	71432
Toluene		0.3	1.1	108883
Xylene		0.1	0.5	1330207
Hexane		0.1	0.1	110543
Ethylbenzene		0.1	0.1	100414

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID 8

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
PM10	NA	Negligible	Negligible	
SO2	NA	Negligible	Negligible	
NOx	NA	0.38	1.64	
CO	NA	2.04	8.94	
VOC	NA	Negligible	Negligible	

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID T-11

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	NA	2.2	9.5	
n-Hexane	NA	0.2	0.6	

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID T-12

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	NA	2.2	9.5	
n-Hexane	NA	0.2	0.6	

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID F-1

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	NA	1.3	5.7	
n-Hexane	NA	Negligible	0.1	110-54-3

Note: Negligible (less than 0.01 ton/year or 0.01 lb/hr)
Note: HAP emission rates rounded up to 0.1 tons/year only if calculated emission rates are 0.05 tons/year or greater. Otherwise, the emissions are considered negligible.
See Appendix A for supporting information

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Federal Operating Permit Program (40 CFR Part 71)

POTENTIAL TO EMIT (PTE)

For each unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below and sum them up to show totals for the facility. You may find it helpful to complete form **EMISS** before completing this form. Show other pollutants not listed that are present in major amounts at the facility on attachment in a similar fashion. You may round values to the nearest tenth of a ton. Also report facility totals in section **J** of form **GIS**.

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
1	11.59	4.35	Negligible	Negligible	23.18	Negligible	0.7
2	11.59	4.35	Negligible	Negligible	23.18	Negligible	0.7
3	11.59	4.35	Negligible	Negligible	23.18	Negligible	0.7
4	0.0	4.64	0.0	0.0	0.0	0.0	2.5
5	0.0	4.64	0.0	0.0	0.0	0.0	2.5
6	0.0	4.64	0.0	0.0	0.0	0.0	2.5
7	0.0	4.64	0.0	0.0	0.0	0.0	2.5
8	1.64	Negligible	Negligible	Negligible	8.94	Negligible	Negligible
T-11	NA	9.5	NA	NA	NA	NA	0.6
T-12	NA	9.5	NA	NA	NA	NA	0.6
F-1	NA	5.7	NA	NA	NA	NA	0.1
FACILITY TOTALS	**36.41**	**56.31**	**0**	**0**	**78.48**	**0**	**13.4**

United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

Complete this section for each unique combination of applicable requirements and emissions units at the facility. List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Indicate your compliance status at this time for this requirement and compliance methods and check "YES" or "NO" to the follow-up question.

Emission Unit ID(s): **1, 2, 3**

Applicable Requirement (Describe and Cite):
Title V Operating Permit R6FOPP71-05; Condition 1.2 Table 2
Emission Limitations: NOx 11.59 tpy; CO 23.18 tpy; VOC 4.35 tpy; HAPs 0.62 tpy

Compliance Methods for the Above (Description and Citation):
Monitoring of fuel consumption as per Condition 3.2.5 and recordkeeping of maintenance and repair activities as per Condition 3.2.4.

Compliance Status:

__X__ In Compliance: Will you continue to comply up to permit issuance? __X__Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes ____No

Emission Unit ID(s): **1, 2, 3**

Applicable Requirement (Describe and Cite):
Title V Operating Permit R6FOPP71-05; Condition 3.2.2 and 3.2.3
Natural gas burned shall not exceed 64.5 MMScf/yr; maximum design heat input 8.1 MMBtu/hr. (as revised in February 22, 2005 Request for Permit Modification)

Compliance Methods for the Above (Description and Citation):
Recordkeeping and Reporting – demonstrated by recording fuel flow/consumption on a monthly basis and reporting in Six-Month Report.

Compliance Status:

__X__ In Compliance: Will you continue to comply up to permit issuance? __X__Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes ____No

Emission Unit ID(s): **1 , 2, 3**

Applicable Requirement (Describe and Cite):
Title V Operating Permit R6FOPP71-05; Condition 3.2.5 and 3.2.6
Record fuel flow/consumption on a monthly basis. Maintain records at least 5 years from date recorded.

Compliance Methods for the Above (Description and Citation):
Recordkeeping and Reporting – demonstrated by maintaining required records and reporting in Six-Month Report.

Compliance Status:

__X_ In Compliance: Will you continue to comply up to permit issuance? __X_Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes ____No

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Emission Unit ID(s): **1, 2, 3**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Table 1 and Condition 3.2.1
Unit shall be equipped with catalytic converter and air fuel ratio controller. Control efficiency must be NOx 90%; CO 80%; and VOC 50%. Maintain pollution control equipment according to manufacturer's recommendations. Quarterly, verify proper operation of the controller by measuring and recording exhaust oxygen or NOx concentrations with a properly calibrated portable analyzer.

Compliance Methods for the Above (Description and Citation):
Monitoring, Recordkeeping and Reporting – demonstrated by performing and documenting required maintenance and monitoring.

Compliance Status:

_X__ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

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Emission Unit ID(s): **4, 5, 6, 7**

Applicable Requirement (Description and Citation):
40 CFR 63, Subpart HH – National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities

Compliance Methods for the Above (Description and Citation):
Recordkeeping (40 CFR 63.764(e)(1)(ii)) – Maintain documentation of applicability of exemption from 40 CFR 63, Subpart HH general standards. Annually, calculate and record benzene emissions from the dehydrator are < 1 tpy.

Compliance Status:

_X___ In Compliance: Will you continue to comply up to permit issuance? __X_Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

Emission Unit ID(s): **4, 5, 6, 7**

Applicable Requirement (Describe and Cite):
Title V Operating Permit R6FOPP71-05; Condition 1.2 Table 2
Emission Limitations: VOC 4.64 tpy; HAPs 2.56 tpy

Compliance Methods for the Above (Description and Citation):
Monitoring of fuel consumption as per Condition 3.2.5 and recordkeeping of maintenance and repair activities as per Condition 3.2.4.

Compliance Status:

__X__ In Compliance: Will you continue to comply up to permit issuance? __X__Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes ____No

Emission Unit ID(s): **4, 5, 6, 7**

Applicable Requirement (Describe and Cite):
Title V Operating Permit R6FOPP71-05; Table 1
Maximum production rate shall not exceed 0.8333 MMscf/hr or 7300 MMscf/yr.

Compliance Methods for the Above (Description and Citation):
Recordkeeping: Maintaining records of all repair and maintenance activities performed on all emission units (Units 4, 5, 6, and 7) (Condition 3.2.4).

Compliance Status:

__X__ In Compliance: Will you continue to comply up to permit issuance? __X__Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis?__Yes__No

Emission Unit ID(s): **4, 5, 6, 7**

Applicable Requirement (Describe and Cite):
Title V Operating Permit R6FOPP71-05; Condition 3.2.5 and 3.2.6
Record fuel flow/consumption on a monthly basis. Maintain records at least 5 years from date recorded.

Compliance Methods for the Above (Description and Citation):
Recordkeeping and Reporting – demonstrated by maintaining required records and reporting in Six-Month Report.

Compliance Status:

__X__ In Compliance: Will you continue to comply up to permit issuance? __X__Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes ____No

Emission Unit ID(s): **4, 5, 6, 7,8**

Applicable Requirement (Describe and Cite):
Title V Operating Permit R6FOPP71-05; Condition 1.2 Table 1
Control Equipment: Dehydrators (Units 4, 5, 6, and 7) must be connected to the flare (Unit 8)

Compliance Methods for the Above (Description and Citation):
Monitoring and Recordkeeping: pollution control equipment (facility flare, Unit 8) must be installed and maintained according to manufacturer's recommendations (Condition 3.2.1). Records of all repair and maintenance activities performed on all emission units (Units 4, 5, 6, 7 and 8) must be documented (Condition 3.2.4).

Compliance Status:

_X_ In Compliance: Will you continue to comply up to permit issuance? _X_Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes ____No

Emission Unit ID(s): **8**

Applicable Requirement (Describe and Cite):
Title V Operating Permit R6FOPP71-05; Condition 1.2 Table 2
Emission Limitations: NOx 1.64 tpy; CO 8.94 tpy

Compliance Methods for the Above (Description and Citation):
Monitoring of fuel consumption as per Condition 3.2.5 and recordkeeping of maintenance and repair activities as per Condition 3.2.4.

Compliance Status:

_X_ In Compliance: Will you continue to comply up to permit issuance? _X_Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes ____No

Emission Unit ID(s): **8**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Condition 3.2.2 and 3.2.3
Natural gas burned shall not exceed 89 MMScf/yr; maximum design heat input 5.52 MMBtu/hr. (as revised in February 22, 2005 Request for Permit Modification)

Compliance Methods for the Above (Description and Citation):
Recordkeeping and Reporting – demonstrated by recording fuel flow/consumption on a monthly basis and reporting in Six-Month Report.

Compliance Status:

_X_ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

Emission Unit ID(s): **Facility-wide**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Condition 3.1
Fuel will be limited to natural gas with a sulfur content not to exceed 0.8 percent by weight.

Compliance Methods for the Above (Description and Citation):
Monitoring, Recordkeeping and Reporting – demonstrated by maintaining required records of fuel sulfur monitoring in accordance with Best Management Practice.

Compliance Status:

_X__ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

Emission Unit ID(s): **Facility-wide**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Condition 3.2.4
Keep records on all repair and maintenance activities for all emission units.

Compliance Methods for the Above (Description and Citation):
Recordkeeping – demonstrated by recording all repair and maintenance activities by identifying relevant emission unit and describing work performed.

Compliance Status:

_X__ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

Emission Unit ID(s): **Facility-wide**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Condition 3.2.7
Keep records of serial numbers for each emission unit.

Compliance Methods for the Above (Description and Citation):
Recordkeeping and Reporting – demonstrated by maintaining records of serial numbers for each emission unit. Changes in serial number should be reflected Six-Month Report

Compliance Status:

_X__ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

Emission Unit ID(s): **Facility-wide**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Condition 3.2.9
Submit Semiannual Monitoring Report.

Compliance Methods for the Above (Description and Citation):
Submittal – Six-Month Report shall be submitted to EPA Region 6 Office by January 20 and July 20 for the previous semiannual period. The report will include fuel flow/consumption records showing monthly and yearly average of fuel usage; repair and maintenance records of each emission unit; and change of serial number.

Compliance Status:

_X__ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

Emission Unit ID(s): **Facility-wide**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Condition 5
Submit Annual Fee Payment, including updated fee calculation worksheet, submitted by July 20 each year.

Compliance Methods for the Above (Description and Citation):
Submittal – Submit reports to EPA Region 6 Office by July 20 of each year for the previous calendar year's emissions. Include hours of operation of the facility, calculated annual emissions for pollutants listed in Table 2 of the Permit, summary of periods of noncompliance, and payment of annual fees.

Compliance Status:

_X__ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

Emission Unit ID(s): **Facility-wide**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Condition 5.3
Submit Annual Compliance Certification.

Compliance Methods for the Above (Description and Citation):
Recordkeeping and Reporting – Submit report to EPA Region 6 Office by January 20 of each year describing compliance with permit terms and conditions, including emission limitations, standards, work practices, fuel usage and heat input.

Compliance Status:

_X__ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

Emission Unit ID(s): **Facility-wide**

Applicable Requirement (Description and Citation):
Title V Operating Permit R6FOPP71-05; Condition 5.17
Submit Permit Renewal.

Compliance Methods for the Above (Description and Citation):
Submittal - submit renewal application 6-18 months prior to permit's expiration date.

Compliance Status:

_X__ In Compliance: Will you continue to comply up to permit issuance? _X___Yes ____No

___ Not In Compliance: Will you be in compliance at permit issuance? ___Yes ___No

___ Future-Effective Requirement: Do you expect to meet this on a timely basis? ____Yes _____No

B. SCHEDULE OF COMPLIANCE - NA

Complete this section if you answered "NO" to any of the questions in section A. Also complete this section if required to submit a schedule of compliance by an applicable requirement. Please attach copies of any judicial consent decrees or administrative orders for this requirement.

Unit(s)_____ Requirement_____

Reason for Noncompliance. Briefly explain reason for noncompliance at time of permit issuance or that future-effective requirement will not be met on a timely basis:

Narrative Description of how Source Compliance Will be Achieved. Briefly explain your plan for achieving compliance:

Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS - NA

Only complete this section if you are required to submit one or more schedules of compliance in section B or if an applicable requirement requires submittal of a progress report. If a schedule of compliance is required, your progress report should start within 6 months of application submittal and subsequently, no less than every six months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe):

First Report____/____/___ Frequency of Submittal_____

Contents of Progress Report (describe):

First Report____/____/___ Frequency of Submittal_____

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

This section must be completed once by every source. Indicate when you would prefer to submit compliance certifications during the term of your permit (at least once per year).

Frequency of submittal____Annual_____ Beginning__12 / 31 / 2004__

E. COMPLIANCE WITH ENHANCED MONITORING & COMPLIANCE CERTIFICATION REQUIREMENTS

This section must be completed once by every source. To certify compliance with these, you must be able to certify compliance for every applicable requirement related to monitoring and compliance certification at every unit.

Enhanced Monitoring Requirements: _X_ In Compliance ____ Not In Compliance

Compliance Certification Requirements: _X_ In Compliance ____ Not In Compliance

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CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

Ojito Compressor Station

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Wicburg (First) Don (MI) ____

Title Director, Four Corner Area Operations

Street or P.O. Box 188 County Road 4900

City Bloomfield State NM ZIP 87413

Telephone (505) 632 – 4628 Ext. _____ Facsimile (505) 632 - 4781

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) _____

Name (typed) Don Wicburg Date: 6 / 18 / 2008