Statement of Basis/Data Base Summary
GCP-Oil & Gas (O&G) Permit

Facility Classification
Synthetic Minor - >80%

Permit Writer:	Joseph Mashburn
GCP No.	7426(M2)
Agency Interest No.	38004 - PRN20230002
AIRS ID No.	35-015-1756
SIC Code:	1321: Natural gas liquids
Facility Type:	O&G-Gas Plant
Company:	Pronto Midstream, LLC
Facility:	Marlan Gas Plant
Type of Permit Action:	GCP - Oil and Gas Revision
Registration Date:	AQB ePermitting Portal
Receive Date:	October 17, 2023
Co. Pub Notice Date/Paper:	N/A for a revision
Public Hearing:	NR
Permit Due:	November 16, 2023
Permit Issued:	November 16, 2023
Facility Location:	Located at 55 Buffalo Grass Rd., Carlsbad, NM 88220. The facility can be reached from Carlsbad via the US-180 East/US-62 East and turning left onto NM-243/SH-176.
UTM Zone:	13
UTM Easting:	610,000 meters
UTM Northing:	3,600,310 meters
Elevation:	3,560 feet
County:	Eddy
Contact Name:	Kha Mach **Phone:** 972-371-5472 **Email:** kha.mach@matadorresources.com
Contact Address:	5400 LBJ Freeway Ste 1500 Dallas, TX 75240
Consultant Name:	Jaimy Karacaoglu Trinity Consultants **Phone:** 505-266-6611 **Email:** aerenstein@trinityconsultants.com

Consultant Address: 9400 Holly Ave NE
Building 3, Suite 300
Albuquerque, NM 87122

1.0 Registration Summary:

Pronto Midstream, LLC (Pronto) is submitting this GCP O&G modification application for its Marlan Gas Plant (Marlan). The facility is located 25 miles northeast of Carlsbad, NM in Eddy County. Pronto will be adding another train to the facility. The equipment previously permitted will be known as Train 1, and the new equipment will be known as Train 2. Pronto will be increasing the gas throughput of Train 1 from 60 MMSCFD to 70 MMSCFD. Train 2 will have a gas throughput of 200 MMSCFD, a condensate throughput of 1682 bbl/d, and a produced water throughput of 100 bbl/d. The proposed facility wide throughputs of the facility will be 270 MMSCFD for gas, 2,024 bbl/d for condensate, and 128 bbl/d for produced water. The existing units at this facility will also be modified based on a new ProMax simulation and methodologies.

The following units will be installed (new) at this facility:

- One (1) 200 MMscfd amine treating unit (Unit AMINE-02);
- One (1) 200 MMscfd TEG dehydrator (Unit DEHY-01);
- One (1) 3.75 MMBtu/hr TEG dehy reboiler (Unit REB-01);
- One (1) 75 MMBtu/hr hot oil heater (Unit HT-04);
- One (1) 27.563 MMBtu/hr trim heater (Unit HT-05);
- One (1) 17.947 MMBtu/hr mol sieve heater (Unit HT-06);
- Four (4) 400 bbl condensate tanks (Units OILTANK-05 - 08);
- Two (2) 400 bbl produced water tanks (Units PWTANK-01 - 02);
- One (1) tank combustor (Unit ECD-02);
- One (1) amine oxidizer (Unit TO-02);
- One (1) facility flare (Unit FLARE-02);
- Condensate loading emissions (Unit OILLOAD-02);
- Unpaved haul road emissions (UNIT ROAD-02);
- One (1) nitrogen rejection unit (Unit NRU-01); and
- Fugitive equipment leaks (FUG-02)

The following units will be modified at this facility:

- Three (3) 1775 hp CAT G3606 A3 compressor engines (Units CE-01 through CE-03);
- One (1) 60 MMscfd amine treating unit (Unit AMINE-01);
- One (1) 39.4 MMBtu/hr hot oil heater (Unit HT-01);
- One (1) 6.8 MMBtu/hr trim heater (Unit HT-02);
- One (1) 7.5 MMBtu/hr mol sieve heater (Unit HT-03);
- Four (4) 400 bbl condensate tanks (Units OILTANK-01 - 04);
- One (1) tank combustor (Unit ECD-01);
- One (1) amine oxidizer (Unit TO-01);
- One (1) facility flare (Unit FLARE-01); and
- Fugitive equipment leaks (FUG-01)

The following units will remain unchanged at this facility:

- Controlled MSS activities (Unit MSS-01); and
- Malfunction events (Unit MALFUNCTION)

The following units are exempt equipment pursuant to 20.2.72.202.B(5):

- Produced water loading emissions (Unit PWLOAD-01 and PWLOAD-02)

Written description of the routine operations of the facility

There are two trains present at this facility that operate identically. Inlet gas enters the facility and is directed to a slug catcher to separate liquids from the inlet natural gas. Liquids

from the slug catcher will be routed to a stabilizer where stabilized condensate and produced water are directed to storage tanks for truck load out (Unit OILLOAD-01 & OILLOAD-02) and stabilized NGL directed straight to the NGL pipeline. Unpaved haul roads (ROAD-01 and ROAD-02) are used for truck loading and unloading. The storage facility consists of eight (8) 400 bbl condensate tanks (Units OILTANK-01 – 08) and four (4) 400 bbl produced water storage tanks (Units PWTANK-01 – 04). Vapors from the tanks and loading operations are controlled by the tank combustors (Units ECD-01 & ECD-02) with a destruction efficiency of 95% for ECD-01 and 98% for ECD-02. After passing through the slug catcher, the gas stream is directed to amine treating units at a rate of 70 MMscfd for Train 1 (Unit AMINE-01) and 200 MMscfd for Train 2 (Unit AMINE-02) where the gas is contacted with methyldiethanolamine (MDEA). The gas is routed from the top of the contactors for further processing. The rich MDEA streams from the bottoms of the contractors is flashed in flash tanks and then routed to regenerators where it is heated by hot oil to regenerate the MDEA. Separate natural gas-fired heaters heat the hot oil that is circulated through each train's process as a heat transfer medium. The flashed vapors from the flash tanks are captured and either consumed as fuel gas or sent to the facility flares (Units FLARE-01 & FLARE-02) with a 95% DRE. The vapors from the regenerators are routed to thermal oxidizers (Units TO-01 & TO- 02) with a 98% DRE. During thermal oxidizer downtime, the vapors are routed to the facility flares with a 95% DRE.

The gas from the amine treating unit in Train 1 is sent through a cryogenic unit to separate and extract natural gas liquids. Besides the regeneration heater and the cryo-hot oil heater, this is a closed system. The resulting residue gas and NGL streams are sent directly to the residue and NGL pipelines, respectively. The residue compression is handled by three (3) 1,775 hp Caterpillar 3606 A3 compressor engines (Units CE-01 – 03), which are equipped with oxidation catalysts for control of CO, VOCs, and HCHO.
The gas from the amine treating unit in Train 2 is sent to a TEG dehydrator (Unit DEHY-01) for further treatment. The dehy overheads are sent to a nitrogen rejection unit (Unit NRU-01) to remove nitrogen from the sales gas. The dehydrator operates with a flash tank and a BTEX condenser. The natural gas fired reboiler provides heat for the regenerator. The noncondensable overheads from the BTEX condenser are sent to the thermal oxidizer (Unit TO-02) with a 98% DRE. The flash gas overheads are used as fuel at the facility.

Routine or predictable emissions during Startup, Shutdown and Maintenance (SSM):
The SSM activities that will be controlled by the facility flares (FLARE-01 and FLARE-02) include vessel blowdowns, compressor blowdowns, and amine acid gas and dehy sour gas during downtimes of the thermal oxidizers (TO-01 and TO-02). Compressors are blown down for maintenance, start-up, and shutdown purposes. The uncontrolled SSM activities include pipeline pigging and other events. Both the controlled and uncontrolled SSM emissions are below the GCP O&G allowance of 10 tpy VOC and 1 tpy HAP.

☒ Applicant requests up to 10 tpy of VOC SSM emissions.

☒ Applicant requests site specific combustion SSM and those emission calculations are included in Section 5 and entered in Table 2F.

Provide an overview: FLARE-01 & FLARE-02 will control amine acid gas during downtimes of the thermal oxidizers (Units TO-01 & TO-02), sour gas during dehy downtimes (Unit DEHY-01), as well as vessel and compressor blowdowns.

Malfunction Emissions (M):

Overview: Pronto is requesting 10 tpy VOC

2.0 Description of Modification:

Pronto will be adding another train to the facility. The equipment previously permitted will be known as Train 1, and the new equipment will be known as Train 2. Pronto will be increasing the gas throughput of Train 1 from 60 MMSCFD to 70 MMSCFD. Train 2 will have a gas throughput of 200 MMSCFD, a condensate throughput of 1682 bbl/d, and a produced water throughput of 100 bbl/d. The proposed facility wide throughputs of the facility will be 270 MMSCFD for gas, 2,024 bbl/d for condensate, and 128 bbl/d for produced water. The existing units at this facility will also be modified based on a new ProMax simulation and methodologies.

3.0 History (In descending chronological order)

Permit Number	Issue Date	Action Type	Description of Action (Changes)
7426M2	11/16/2023	GCP O&G – Revision	Pronto will be adding another train to the facility. The equipment previously permitted will be known as Train 1, and the new equipment will be known as Train 2. Pronto will be increasing the gas throughput of Train 1 from 60 MMSCFD to 70 MMSCFD. Train 2 will have a gas throughput of 200 MMSCFD, a condensate throughput of 1682 bbl/d, and a produced water throughput of 100 bbl/d. The proposed facility wide throughputs of the facility will be 270 MMSCFD for gas, 2,024 bbl/d for condensate, and 128 bbl/d for produced water. The existing units at this facility will also be modified based on a new ProMax simulation and methodologies.
7426M1R3	9/2/2023	Admin. Revision	CE-1 like-kind engine replacement. 4ZS01395 to serial number 3XF00092
7426M1R2	11/22/2022	Admin. Revision	CE-2 like-kind engine replacement. 4ZS01363 to serial number 3XF00328. Also, name change from Lane Gas Plant to Marlan Gas Plant.
7426M1R1	8/12/2022	Admin. Revision	Ownership changes to Pronto Midstream, LLC
7426M1	7/2/2020	GCP O&G – New	Issue new GCP O&G
7426	12/20/2018	GCP4	Form C of GCP4 issued

4.0 Public Response/Concerns: As of November 16, 2023, this permit writer is not aware of any public comment or concern.

5.0 Facility Specifications:

Total Pollutant Emissions from Entire Facility (for information only, not an enforceable condition):

Pollutant	Emissions (tons per year)	Emission Type
Nitrogen Dioxide	**93.48**	**Allowable**
Carbon Monoxide	**94.69**	**Allowable**

Pollutant	Emissions (tons per year)	Emission Type
Volatile Organic Compounds (VOC)	130.78	Allowable
Sulfur Dioxide	67.59	Allowable
Particulate Matter (10 microns or less)	9.11	Allowable
Particulate Matter (2.5 microns or less)	8.39	Allowable
Hydrogen sulfide (NMAAQ)	0.68	Allowable

Total HAPS* and NM TAPS that exceed 1.0 ton per year (for information only, not an enforceable condition):

Pollutant	Emissions (tons per year)	Emission Type
Acetaldehyde; (Ethyl aldehyde)	0.57	Potential
Benzene	7.52	Potential
Formaldehyde	1.59	Potential
Hexane	7.82	Potential
Toluene; (Methyl benzene)	3.27	Potential
Total HAP	22.56	Potential

*** HAP emissions are already included in VOC emissions**

Note: The Total HAPS may not match the sum of the individual HAPS in this table as it will include values from HAPS that are below 1.0 tpy.

Air Pollution Control Devices:

Subject Item ID, Type, ID, (Unit #)	SI Description	Primary	Secondary
AMINE-01 (EQPT11)	Amine Treating Unit	Thermal Oxidizer (Incinerator)	
AMINE-01 (EQPT11)	Amine Treating Unit	Thermal Oxidizer (Incinerator)	Flare
AMINE-02 (EQPT20)	Amine Treating Unit	Incinerator	Flare
CE-01 (EQPT19)	Compressor Engine	Catalytic Oxidation	
CE-02 (EQPT18)	Compressor Engine	Catalytic Oxidation	
CE-03 (EQPT3)	Compressor Engine	Catalytic Oxidation	
DEHY-01 (EQPT21)	TEG Dehydrator	Thermal Oxidizer (Incinerator)	Flare
OILLOAD-02 (EQPT27)	Condensate Truck Loading	Incinerator	
OILOAD-01 (EQPT13)	Loading Condensate	Incinerator	
OILTANK-01 - 04 (EQPT5)	Tanks Condensate 4 x 400 bbl	Incinerator	
OILTANK-05 - 08 (EQPT28)	Condensate Tanks 4 x 400 bbl	Incinerator	
PWTANK-01 - 02 (EQPT15)	Tanks Water 2 x 400 bbl	Incinerator	
PWTANK-03 - 04 (EQPT29)	Produced Water Tank 2 x 400 bbl	Incinerator	

Equipment Specifications (Active):

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
AMINE-01 EQPT11	Amine sweetening unit	TBD	TBD	TBD	01-NOV-18	TBD	/	60 MM SCFD / 60 MM SCFD	Active	Amine Treating Unit

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
AMINE-02 EQPT20	Amine sweetening unit	Interstate treating, Inc.	600 gpm	TBD	TBD	TBD	/	200 MM SCFD / 200 MM SCFD	Active	Amine Treating Unit
CE-01 EQPT19	4SLB RICE	Caterpillar	G3606A3	3XF00328	06-OCT-22	04-OCT-22	/	1775 hp / 1775 hp	Active	Compressor Engine
CE-02 EQPT18	4SLB RICE	Caterpillar	G3606 A3	3XF00092	22-AUG-23	01-JUL-22	/	1775 hp / 1775 hp	Active	Compressor Engine
CE-03 EQPT3	4SLB RICE	Caterpillar	G3606 A3	4ZS01394	01-NOV-18	01-JAN-10	/	1775 hp / 1775 hp	Active	Compressor Engine
DEHY-01 EQPT21	Glycol Dehy Still Vent/Flash Tank	Interstate treating, Inc.	38 gpm	TBD	TBD	TBD	/	200 MM SCFD / 200 MM SCFD	Active	TEG Dehydrator
REB-01 EQPT30	Glycol Dehy Reboiler Burner	TBD	TBD	TBD	TBD	TBD	/	3.75 MM BTU/h 3.75 MM BTU/h	Active	TEG Dehy Reboiler
ECD-01 EQPT12	Incinerator	Cimarron Energy	48HVECD	5904076	01-NOV-18	01-MAR-18	/	5.24 MM BTU/h 5.24 MM BTU/h	Active	Tanks Combustor
ECD-02 EQPT22	Incinerator	TBD	TBD	TBD	TBD	TBD	/	3.27 MM BTU/h 3.27 MM BTU/h	Active	Tank Combustor
FLARE-01 SSM CONT2	Emergency Flare	Zeeco, Inc.	UFAA-24-195	32564-001	01-NOV-18	01-JAN-17	/	9600 MMBTU/h 9600 MMBTU/h	Active	Facility Flare
FLARE-01 CONT1	Emergency Flare	Zeeco, Inc.	UFAA-24-195	32564-001	01-NOV-18	01-JAN-17	/	9600 MMBTU/h 9600 MMBTU/h	Active	Facility Flare
FLARE-02 SSM EQPT32	Process Flare	TBD	TBD	TBD	TBD	TBD	/	14.12 MMBTU/h 14.12 MMBTU/h	Active	Facility Flare

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
FLARE-02 EQPT23	Process Flare	TBD	TBD	TBD	TBD	TBD	/	14.12 MMBTU/h 14.12 MMBTU/h	Active	Facility Flare
HT-01 EQPT7	Heater	Optimized Process Furnaces, Inc	H-1610	J171186	01-NOV-18	01-JAN-17	/	39.4 MM BTU/h 39.4 MM BTU/h	Active	Amine Hot Oil Heater
HT-02 EQPT10	Process Heater	Fulton Thermal Corporation	600S-LF-LN	86770	01-NOV-18	01-JAN-17	/	6.8 MM BTU/h 6.8 MM BTU/h	Active	Cryo Hot Oil Heater
HT-03 EQPT9	Heater	Fulton Thermal Corporation	600S-RGN-LN	19949-1	01-NOV-18	01-JAN-17	/	7.5 MM BTU/h 7.5 MM BTU/h	Active	Regenerator Gas Heater
HT-04 EQPT24	Heater	DEVCO HELIFLO	TBD	TBD	TBD	01-MAR-21	/	75 MM BTU/h 75 MM BTU/h	Active	Hot Oil Heater
HT-05 EQPT25	Heater	ASTEC	HEATEC HCI-12010-10-G	22008	TBD	01-MAR-22	/	27.56 MMBTU/h 27.56 MMBTU/h	Active	Trim Heater
HT-06 EQPT26	Heater	ASTEC	HEATEC HCI-12010-10-G	22007	TBD	01-MAR-22	/	17.95 MM BTU/h 17.95 MM BTU/h	Active	Mol Sieve Heater
NRU-01 RPNT5	Fugitives	N/A	N/A	N/A	TBD	TBD	/	/	Active	Nitrogen Rejection Unit
OILLOAD-02 EQPT27	Loading/Unloading Rack	N/A	N/A	N/A	TBD	TBD	/	614295 bbl/y 614296 bbl/y	Active	Condensate Truck Loading
OILOAD-01 EQPT13	Loading/Unloading Rack	N/A	N/A	N/A	TBD	TBD	/	124773 bbl/y / 124773 bbl/y	Active	Loading Condensate
OILTANK-01 - 04 EQPT5	Tank - Above Ground	TBD	TBD	TBD	01-NOV-18	TBD	/	400 bbl / 5242.86 M gal/y	Active	Tanks Condensate 4 x 400 bbl
OILTANK-05 - 08 EQPT28	Tank - Above Ground	TBD	TBD	TBD	TBD	TBD	/	400 bbl / 25789.87 M gal/y	Active	Condensate Tanks 4 x 400 bbl
PWTANK-01 - 02 EQPT15	Tank - Above Ground	TBD	TBD	TBD	01-NOV-18	TBD	/	400 bbl / 429.24 M gal/y	Active	Tanks Water 2 x 400 bbl

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
PWTANK-03 - 04 EQPT29	Tank - Above Ground	TBD	TBD	TBD	TBD	TBD	/	400 bbl / 1532.96 M gal/y	Active	Produced Water Tank 2 x 400 bbl
ROAD-01 AREA2	Unpaved roads	N/A	N/A	N/A	TBD	TBD	/	/	Active	Unpaved Haul Roads
ROAD-02 AREA3	Unpaved roads	N/A	N/A	N/A	TBD	TBD	/	/	Active	Unpaved Haul Roads
TO-01 EQPT14	Thermal Oxidizer (Incinerator)	Zeeco, Inc.	TO-1526	32985	01-NOV-18	TBD	/	7.5 MM BTU/h 7.5 MM BTU/h	Active	Amine Oxidizer 7.5 MMBtu/hr
TO-02 EQPT31	Thermal Oxidizer (Incinerator)	TBD	TBD	TBD	TBD	TBD	/	13.13 MM BTU/h 13.13 MM BTU/h	Active	Amine and Dehy Oxidizer
FUG-01 RPNT1	Fugitives	N/A	N/A	N/A	N/A	N/A	/	/	Active	Fugitive Emissions
FUG-02 RPNT4	Fugitives	N/A	N/A	N/A	N/A	N/A	/	/	Active	Fugitive Emissions
MALFUNCTION RPNT3	Fugitives	NA	NA	NA	N/A	N/A	/	/	Active	Malfunction
MSS-01 RPNT2	Fugitives	N/A	N/A	N/A	N/A	N/A	/	/	Active	Start-up, Shutdown, & Maintenance

Equipment Specifications (Removed w/ 7426M2):

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
AREA1 ROAD-01	Roads						/	/	Removed	Removed-Unpaved Haul Roads

Unit No.	Unit Type	Manufacturer	Model No.	Serial No.	Yr of Construction	Yr of Manufacture	Operating Rate Max/Site	Operating Capacity Max/Site	Subject Item Status	Subject Item Description
EQPT16 PWLOAD-01	Loading/Unloading Rack				01-NOV-18		/	bbl/y / bbl/y	Removed	Removed-Loading Water
EQPT17 COMP-RP	Compressor	N/A	N/A		01-NOV-18		/	/	Removed	Removed-Rod Packing Leaks, Assoc with Compressors

Emissions: Pollutant **Permitted** (Allowable and SSM) Emissions per piece of equipment or Subject Item as represented by applicant.

Unit No.	NO_x (pph)	[1]NO_x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO_2 (pph)	SO_2 (tpy)	PM_{10} (pph)	PM_{10} (tpy)	$PM_{2.5}$ (pph)	$PM_{2.5}$ (tpy)	H_2S (pph)	H_2S (tpy)
AMINE-01 (EQPT11)	-	-	-	-	0	0	-	-	-	-	-	-	-	-
AMINE-02 (EQPT20)	-	-	-	-	0	0	-	-	-	-	-	-	0	0
CE-01 (EQPT19)	1.96	8.57	.74	3.26	1.34	5.85	.063	.28	.13	.59	.13	.59	-	-
CE-02 (EQPT18)	1.96	8.57	.74	3.26	1.34	5.85	.063	.28	.13	.59	.13	.59	-	-
CE-03 (EQPT3)	1.96	8.57	.74	3.26	1.34	5.85	.063	.28	.13	.59	.13	.59	-	-
DEHY-01 (EQPT21)	-	-	-	-	0	0	-	-	-	-	-	-	0	0
ECD-01 (EQPT12)	.25	1.11	.21	.94	.26	1.13	.011	.05	.019	.084	.019	.084	-	-
ECD-02 (EQPT22)	.32	1.41	.27	1.19	.3	1.3	.0006	.0025	.024	.11	.024	.11	-	-

Unit No.	NO_x (pph)	[1]NO_x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO_2 (pph)	SO_2 (tpy)	PM_{10} (pph)	PM_{10} (tpy)	$PM_{2.5}$ (pph)	$PM_{2.5}$ (tpy)	H_2S (pph)	H_2S (tpy)
FLARE-01 SSM (CONT2)	21.37	1.83	42.66	3.65	85.07	6.66	-	-	-	-	-	-	-	-
FLARE-01 (CONT1)	.023	.1	.046	.2	-	-	.0008	.0034	-	-	-	-	-	-
FLARE-02 SSM (EQPT32)	22.55	3.02	51.46	6.16	85.34	7.01	14.32	.31	-	-	-	-	.16	.0034
FLARE-02 (EQPT23)	.011	.05	.1	.43	-	-	.0008	.0034	-	-	-	-	-	-
HT-01 (EQPT7)	3.86	16.92	3.24	14.21	.21	.93	.18	.81	.29	1.29	.29	1.29	-	-
HT-02 (EQPT10)	.67	2.92	.56	2.45	.037	.16	.032	.14	.051	.22	.051	.22	-	-
HT-03 (EQPT9)	.74	3.22	.62	2.71	.04	.18	.035	.15	.056	.24	.056	.24	-	-
HT-04 (EQPT24)	3.68	16.1	6.18	27.05	.4	1.77	.33	1.44	.56	2.45	.56	2.45	-	-
HT-05 (EQPT25)	1.35	5.92	2.27	9.94	.15	.65	.12	.53	.21	.9	.21	.9	-	-
HT-06 (EQPT26)	.88	3.85	1.48	6.47	.1	.42	.079	.35	.13	.59	.13	.59	-	-
NRU-01 (RPNT5)	-	-	-	-	.48	2.1	-	-	-	-	-	-	-	-
OILLOAD-02 (EQPT27)	-	-	-	-	2.75	4.02	-	-	-	-	-	-	-	-
OILOAD-01 (EQPT13)	-	-	-	-	.62	.19	-	-	-	-	-	-	-	-

Unit No.	NO_x (pph)	[1] NO_x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO_2 (pph)	SO_2 (tpy)	PM_{10} (pph)	PM_{10} (tpy)	$PM_{2.5}$ (pph)	$PM_{2.5}$ (tpy)	H_2S (pph)	H_2S (tpy)
OILTANK-01 - 04 (EQPT5)	-	-	-	-	0	0	-	-	-	-	-	-	-	-
OILTANK-05 - 08 (EQPT28)	-	-	-	-	0	0	-	-	-	-	-	-	-	-
PWTANK-01 - 02 (EQPT15)	-	-	-	-	0	0	-	-	-	-	-	-	-	-
PWTANK-03 - 04 (EQPT29)	-	-	-	-	0	0	-	-	-	-	-	-	-	-
REB-01 (EQPT30)	.37	1.61	.31	1.35	.02	.089	.016	.072	.028	.12	.028	.12	-	-
ROAD-01 (AREA2)	-	-	-	-	-	-	-	-	1.1	.17	.11	.017	-	-
ROAD-02 (AREA3)	-	-	-	-	-	-	-	-	.86	.63	.086	.063	-	-
TO-01 (EQPT14)	.77	3.39	.65	2.85	2.37	10.38	.023	.1	.059	.26	.059	.26	-	-
TO-02 (EQPT31)	1.44	6.32	1.21	5.31	5.01	21.92	14.34	62.79	.063	.28	.063	.28	.16	.68
FUG-01[2] (RPNT1)	-	-	-	-	4.43	19.39	-	-	-	-	-	-	-	-
FUG-02[2] (RPNT4)	-	-	-	-	3.87	16.93	-	-	-	-	-	-	.0001	.0006
MALF (RPNT3)	-	-	-	-	-	10	-	-	-	-	-	-	-	-
MSS-01 (RPNT2)	-	-	-	-	-	8	-	-	-	-	-	-	-	-

1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO_2.
2 Fugitives are included in the total VOC tpy for the facility but do not count towards major source determination.
3 "-" indicates the application represented emissions of this pollutant are not expected.
4 "<" indicates that the application represented the uncontrolled mass emission rates are less than 1.0 pph or 1.0 tpy for this emissions unit and this air pollutant. The Department determined that allowable mass emission limits were not required for this unit and this pollutant.
5 "*" Hourly limits are not appropriate for this pollutant.

6.0 Compliance Testing: That may apply.

Unit(s)	Compliance Test	Timeline
Engine(s) or Turbine(s) > 180 hp Exemption: Existing units that have been tested within the last five (5) years are not required to perform an initial compliance test.	Initial Compliance Test Testing requirements shall be conducted in accordance with Section B111 of the GCP- O&G Permit. A test may be waived by the Department if the test is not required under a NMAC, NSPS, NESHAP or MACT.	Compliance tests shall be conducted within sixty (60) days after the unit(s) achieve the maximum normal production rate. If the maximum normal production rate does not occur within one hundred twenty (120) days of source startup, then the tests must be conducted no later than one hundred eighty (180) days after initial startup of the source.
Engine(s) or Turbine(s) > 180 hp Facilities with a PER less than 80 tpy of each regulated air pollutant shall perform periodic testing every three (3) years.	Periodic Testing Testing requirements shall be conducted in accordance with Section B111 of the GCP- O&G Permit. A test may be waived by the Department if the test is not required under a NMAC, NSPS, NESHAP or MACT.	Every three (3) years.
Engine(s) or Turbine(s) > 180 hp Facilities with PER greater than the 80 tpy of any regulated air pollutant shall perform periodic testing once per calendar year for each engine or turbine > 180 hp.	Periodic Testing Testing requirements shall be conducted in accordance with Section B111 of the GCP- O&G Permit	Every calendar year.
Flares	N/A unless subject to compliance test under a NMAC, NSPS, NESHAP or MACT.	Test dates according to applicable regulation

Thermal Oxidizers	If the owner or operator does not provide manufacturer's data to establish the minimum operating temperature required to achieve 98% control efficiency, the owner/operator shall perform an initial compliance test to determine such operating temperature.	Within sixty (60) days of the start of operations, and the results shall be submitted to the Department within thirty (30) days of the test.
Storage Tanks	N/A unless subject to compliance test under a NMAC, NSPS, NESHAP or MACT.	Test dates according to applicable Regulation.

7.0 Startup and Shutdown:

Were emissions from startup, shutdown, and scheduled maintenance operations calculated and included in the emission tables? ☒ Yes
☐ No:

8.0 State and Federal Regulatory Analysis (NMAC/AQCR): Refer to Section 8 of the GCP O&G Registration Form.

9.0 Permit Writer Comments:

Facility is SM80 for NOx, CO, VOC, and Total HAP