

ATTACHMENT I

Regulatory Applicability Information

This document provides an example of the regulatory applicability information an operator may choose to provide in Attachment I of the construction permit application. The applicant should provide an analysis of the applicability of state and federal air quality permitting requirements and air pollution control regulations for the proposed emissions source(s). The purpose of Attachment I is to provide appropriate explanation and rationale regarding the applicability or non-applicability of specific regulations for the proposed emissions source(s).

Regulation 3, Part A, Section II: The flare and tank truck loadout emissions are not subject to APEN reporting. They are exempt under Regulation 3, Part A.II.D.1.k.

Regulation 3, Part C: This facility as proposed will be a major source with respect to the Title V Operating Permit Program. The facility will be required to submit a Title V Permit application within 12 months of startup.

Regulation 3, Part D: This facility is not a listed source in Regulation 3, Part A.I.23.b and therefore would trigger Prevention of Significant Deterioration (PSD) requirements if emissions exceed 250 tpy of any criteria pollutant. This facility as proposed will be a synthetic minor stationary source with respect to PSD and therefore not subject to this regulation.

Regulation 7, Section XII: This facility is not located in the 8-hour Ozone Control Area; therefore this facility is not subject to Section XII of this regulation.

Regulation 7, Section XVII: The engines at this facility are subject to and will be in compliance with all applicable parts of Section XVII of this regulation.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: Subpart JJJJ applies to manufacturers, owners and operators of stationary spark ignition (SI) internal combustion engines (ICE). Applicable engines are the following; engines that commence construction (ordered from the manufacturer) after June 12, 2006 and are manufactured after July 1, 2007 and are greater than or equal to 500 hp or manufactured after July 1, 2008 and are less than 500 hp, and engines that are modified or reconstructed after June 12, 2006. As currently proposed, this subpart will apply. All five proposed engines for this facility are 4 stroke lean burn engines greater than 1350 hp; therefore are subject to and will be in compliance with all applicable requirements of this subpart.

40 CFR 63 Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities: Subpart HH applies to glycol dehydration units, storage vessels with the potential for flashing, and fugitive equipment at major sources of HAP emissions and glycol dehydration units at area sources of HAP emissions. This facility is considered a major source with respect to HAPs. There are no dehydrators or storage vessels with the potential for flashing proposed for this facility. The fugitive equipment, as proposed, will not be in vHAP service. Therefore, according to 63.760(d), this facility will not be subject to the requirements of this subpart.

40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: Subpart ZZZZ applies to existing, new and reconstructed engines greater than 500 hp at major sources of HAP emissions, new and reconstructed engines less than 500 hp at major sources of HAP emissions, and new or reconstructed engines at area sources of HAP emissions. The five proposed engines at this facility will be considered new 4 stroke lean burn engines located at a major source of HAP emissions. As such, they will be subject to and in compliance with applicable requirements of this subpart upon startup.