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| New Mexico Environment Department  Air Quality Bureau  525 Camino de los Marquez, Suite 1  Santa Fe, New Mexico, 87505  Phone (505) 476-4300  Fax (505) 476-4375  [www.env.nm.gov/aqb](http://www.env.nm.gov/aqb) | **NMED ColorLogo-Seal** | **AQB ePermitting Portal** |
| Abbreviated Application (Notice of Intent)  1. I understand that I must submit the hard copy check and required [Payment Information Form](https://cloud.env.nm.gov/air/pages/search.php?search=%21collection3738&k=4366f0be7c) for all AQB ePermitting Portal Submittals before it will be assigned, and the 30-day review period begins.  2. I understand the AQB ePermitting Portal is a new program and I will use the Request NMED Support function in the Portal to: request help, report issues (bugs), and to provide my constructive feedback for improving the Portal. | | |

**Section 1**

**Facility Name or Facility Type Change for Modifications**

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Fill out this section if requesting a change to the facility name or facility type that appears in the ePermitting Portal. These items cannot be updated through the Portal and will be corrected as part of the review of your permit.

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Check the appropriate box(es) and provide complete information in the table.

1. Changing facility name. (Punctuation and special characters not allowed. Use “No123” instead of #123)

2. Changing facility type.

|  |  |  |  |
| --- | --- | --- | --- |
| **1a** | **Current Facility Name:** | **1b** | **New Facility Name:** |
| **2a** | **Current Facility Type:**  Production Site  Tank Battery  Compressor Station  Natural Gas Plant  Reinjection facility  Well head  Misc Oil and Gas  Amine Plant  Energy Support Facility  Other, please specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | **2b** | **New Facility Type:**  Production Site  Tank Battery  Compressor Station  Natural Gas Plant  Reinjection facility  Well head  Misc Oil and Gas  Amine Plant  Energy Support Facility |

**Section 3**

**Application Summary and Routine Operations**

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**NOI Summary:** Include a brief description of the project. If this is a revision or modification to a facility, describe the proposed changes from the original NOI. If this facility is to be co-located with another facility, provide details of the other facility including permit number or NOI number(s).

NOI Summary:

**Process Summary:** Describe operations of the facility. Include a detailed description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated.

Process Summary:

**Routine or predictable emissions during Startup, Shutdown, and Maintenance (SSM):** Check the appropriate SSM box below. SSM emissions from production sites could include but are not limited to VOC venting of compressor blowdowns, pigging, maintenance downtime of VRU, or site-specific combustion SSM emissions.

No SSM emissions are expected from routine operations.

Applicant requests up to 10 tpy of VOC SSM emissions.

Applicant requests site specific VOC SSM and those emissions are included in Section 4.

Provide an overview:

Applicant requests site specific combustion SSM and those emissions are included in Section 4.

Provide an overview:

**Section 4**

**All Calculations and Emissions Summary**

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***Air Emissions Calculation Tool (AECT)***

The AECT is required to be used with this NOI Quick Form. If the AECT for a piece of equipment is under development, provide calculations. [www.env.nm.gov/air-quality/air-emissions-calculation-tool-aect/](http://www.env.nm.gov/air-quality/air-emissions-calculation-tool-aect/)

***NOI representations must demonstrate enforceability of any reductions claimed to reduce the Potential Emission Rate (PER) or Potential to Emit (PTE).***

PER definition in [NMAC 20.2.73.7 NMAC](http://www.env.nm.gov/regulatory-resources/): "Potential emission rate" means the emission rate of a source at its maximum capacity to emit a regulated air contaminant under its physical and operational design, provided any physical or operational limitation on the capacity of the source to emit a regulated air contaminant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its physical and operational design only if the limitation or the effect it would have on emissions is enforceable by the department pursuant to the Air Quality Control Act or the federal act.”

PTE definition in [NMAC 20.2.73.7 NMAC](http://www.env.nm.gov/regulatory-resources/): "Potential to emit" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design; any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is federally enforceable; the potential to emit for nitrogen dioxide shall be based on total oxides of nitrogen.

***20.2.50 NMAC (Part 50)***

The Oil and Gas Sector – Ozone Precursor Pollutants regulation 20.2.50 NMAC (Part 50) establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NOx) for oil and gas production, processing, compression, and transmission sources. The reductions required by Part 50 may be included in PER calculations. However, the reductions required by Part 50 **may not** be included in PTE calculations. Part 50 is not federally enforceable, but it does establish limitations that are enforceable pursuant to the New Mexico Air Quality Control Act. The Title V Operating Permit applicability in 20.2.70 NMAC is based on PTE. When determining Title V major source threshold status, calculations at NOI-only facilities cannot claim reductions required by Part 50.

***Tank Emissions Calculations***

The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, accuracy of the model, the input and output summary from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Pro-Max or Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation. For each crude oil storage tank, identify if the tanks are in series or in parallel.

For tank and loading emission calculations, the annual throughput used for calculations is not required to be the daily throughput times 365 days. The annual throughput of the facility used for calculations must be consistent throughout the application, and a brief rationale should be included in the note sections on the appropriate pages of the AECT.

For tanks subject to federal regulations that require controls (i.e., NSPS OOOO or NSPS OOOOa), applicants may represent tank controls as two scenarios to provide flexibility. Some facilities will have a vapor recovery unit (VRU) installed initially but may later replace the VRU with a flare due to changes in production levels. Representing **both** scenarios in the NOI application will allow the company to replace the VRU with a flare without submitting a revision to the NOI to the Department. To be eligible for this flexibility, both the VRU and flare must be compliant with the federal regulations that require the control of the tanks. Represent both scenarios using the AECT and include comments to explain the requested flexibility.

Represent the worst-case scenario when filling out the emission tables in the Portal. Provide a process flow diagram and a written process description for each scenario. Represent both scenarios using the AECT and include comments to explain the requested flexibility.

***Heater Calculations:***

Heaters, heated separators, and heater treaters may be represented as a combined maximum heat input, provided that each individual unit is rated less than 100 MMBTU/hr each. This will allow applicants flexibility in the number and size of units installed, while still providing demonstration that the facility will comply with NOI limits. To utilize this flexibility, represent the requested total heat input for all these units in the AECT.

***Engines***

Engine options may be represented in an NOI to provide flexibility. No more than 4 options are allowed and not more than 4 engines may be included. The engines may be in any combination that meets all state and federal regulations. When representing engine options, a table is required that specifically lists: the engine(s) in each option, the emissions for each engine, and a worst-case emission row which is the highest PER for each pollutant from all the engines in each option.

The composite row is entered in the Portal Tables. E.g. ENG-1\*; use the comments box to explain the scenario represented. During minor source emissions inventory reporting you will be required to add and report on the individual engines that operated during that reporting year through AEIR.

Unless information is the same for all options:

* Enter “see list” for model and serial number, leave the manufacture date blank, add any regulations that apply to any engine in the option (2A).
* Do not enter anything in the reduction devices table (2C) but list federal controls for each engine in the comments box.
* Use the worse-case stack parameters between all the engine options (2H).
* Leave the fuel usage (2J) blank.

Engine specificity represented in the NOI must be sufficient to determine the emissions from the engine. Engines shall not be installed which do not meet the specificity provided in the NOI. Fill out a separate page in the AECT for each type of engine, the facility totals in the AECT will not be representative of what is requested in the PER Table.

Engine representations must include either:

* the enforceability and applicable parameters (e.g., 100 to 500 hp; JJJJ applicable engine manufactured after 1/1/2011);
* the manufacturer specification sheet (including installed catalysts) to support emission calculations;
* use AP-42 emission factors, or
* use uncontrolled emission factors.

***SSM Calculations:***

The applicant must select one of the boxes in Section 2: SSM Summary. If applicant is submitting site specific calculations, include in this section.

***Control Devices:***

In accordance with 20.2.73.200.B(7) NMAC, report all control devices and list each pollutant controlled by the control device in the Potential Emission Rate Table.

Voluntary flaring of emissions that are not federally enforceable (such as maintenance or loading emissions) should be represented **both** as flared emissions, and as uncombusted emissions. This is necessary to demonstrate that the products of combustion from flaring the emissions do not exceed the applicability threshold for a permit under 20.2.72.200.A(1) NMAC; and that the VOC emissions (if they are not flared) will not cause the site to be defined as a Title V Major Source under 20.2.70.7.4.R NMAC.

**Table 1: Check the equipment entered from the AECT Form Submitted in this Section:**

| **Check box if present at facility** | **Equipment Type** | **Quantity** |
| --- | --- | --- |
|  | **Engine(s)** |  |
|  | **Heater(s)** |  |
|  | **Haul Road** |  |
|  | **Fugitives** |  |
|  | **Tanks** |  |
|  | **Flare(s)** |  |
|  | **Loading** |  |
|  | **ECD** |  |
|  | **Thermal Oxidizer** |  |
|  | **VRU** |  |
|  | **Other** |  |

**Information Used to Determine Emissions**

**Check the box for each type of information submitted**:

If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation.

For tank emissions, include a discussion of the method used to estimate tank-flashing emissions, accuracy of the model, the input and output summary from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.

If requesting to use a representative gas sample, include a discussion of why the sample is representative for this facility and an explanation of how it is representative (e.g., same reservoir, same similar API gravity, similar composition).

**Section 6**

**Applicable State & Federal Regulations**

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**Provide a discussion demonstrating compliance with applicable state & federal regulation**. All input cells should be filled in, even if the response is ‘No’ or ‘N/A’.

In the “Justification” column, identify the criteria that are critical to the applicability determination, numbering each. For each unit subject to a state or federal regulation, after each listed unit, include the lowest level citation of the applicable regulation. For each unit, list the information necessary to verify the applicability of the regulation, including date of manufacture, date of construction, size (hp), and combustion type. Doing so will provide the applicability criteria for each unit.

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**Example of a Table for Applicable State Regulations:**

| [**STATE REGU- LATIONS**](http://www.nmenv.state.nm.us/aqb/regs/index.html)  **CITATION** | **Title** | **Federally Enforce- able** | **Applicability Information:**  Identify the applicability criteria, numbering each (i.e. 1. Post 7/23/84, 2. 75 m3, 3. VOL) | **Applicant’s Justification of Applicability** | **Applicant Identifies if Applies to Entire Facility or Unit No(s)** |
| --- | --- | --- | --- | --- | --- |
| [20.2.38](http://www.nmenv.state.nm.us/aqb/regs/20_2_38nmac_103102.pdf) NMAC | Hydrocarbon Storage Facility | No | **Use the regulation link (left) then cut & paste applicable sections.**  Note: for 20.2.38.112 NMAC, 65,000 gallons is 1547.62 barrels. |  |  |
| 20.2.50 NMAC | Oil and Gas Sector – Ozone Precursor Pollutants | No | This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NOx) for oil and gas production, processing, compression, and transmission sources. | Include the construction status of applicable units as “New”, “Existing”, “Relocation of Existing”, or “Reconstructed” as defined by this Part in your justification: | Check the box for the subparts that are applicable:  113 – Engines and Turbines  114 – Compressor Seals  115 – Control Devices and Closed Vent Systems  116 – Equipment Leaks and Fugitive Emissions  117 – Natural Gas Well Liquid Unloading  118 – Glycol Dehydrators  119 – Heaters  120 – Hydrocarbon Liquid Transfers  121 – Pig Launching and Receiving  122 – Pneumatic Controllers and Pumps  123 – Storage Vessels  124 – Well Workovers  125 – Small Business Facilities  126 – Produced Water Management Unit  127 – Flowback Vessels and Preproduction Operations |
| 20.2.61.109 NMAC | Smoke & Visible Emissions | No | Engines and heaters are Stationary Combustion Equipment. Specify units subject to this regulation. |  |  |
| 20.2.73 NMAC | NOI & Emissions Inventory Requirements | No | **NOI:** 20.2.73.200 NMAC applies (requiring a NOI application) | *Under 20.2.73.300.B(4) NMAC, NMED will periodically request emissions inventory reporting from minor source (expected each third year starting in 2020.)*  *Under 20.2.73.300.B(1) NMAC, if fugitives result in PTE >100 tpy VOC, annual reporting is required.* | *Facility – applies to all NOI facilities.* |
| 20.2.77 NMAC | New Source Performance | Yes | This is a stationary source which is subject to the requirements of 40 CFR Part 60, as amended through 2017.  Applies if any subpart applies. |  |  |
| 20.2.78 NMAC | Emission Standards for HAPS | Yes | This facility emits hazardous air pollutants which are subject to the requirements of 40 CFR Part 61, as amended through 2017.  Applies in any subpart applies |  |  |
| 20.2.82 NMAC | MACT Standards for source categories of HAPS | Yes | This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63, as amended through 2017.  Applies if any subpart applies. |  |  |

**Example of a Table for Applicable Federal Regulations (This is not an exhaustive list):**

| [**FEDERAL REGULATIONS**](http://www.nmenv.state.nm.us/aqb/regs/index.html)  **CITATION** | **Title** | **JUSTIFICATION:** | **Applicant’s Justification of Applicability** | **Identify if applies to Entire Facility or Unit No(s)** |
| --- | --- | --- | --- | --- |
| 40 CFR 50 | NAAQS | Defined as applicable at 20.2.70.7.E.11, Any national ambient air quality standard |  |  |
| NSPS 40 CFR 60,  Subpart A | General Provisions | Applies if any other NSPS subpart applies. |  |  |
| NSPS  40 CFR Part  60 Subpart  OOOO | Standards of Performance for  Crude Oil and Natural Gas Production, Transmission, and Distribution | If there is a standard or other requirement, then the facility is an “affected facility.” Currently there are standards for: gas wells (60.5375); centrifugal compressors (60.5380); reciprocating compressors (60.5385): controllers (60.5390); storage vessels (60.5395); equipment leaks (60.5400); sweetening units (60.5405).  **If standards apply, list the unit number(s) and regulatory citation of the standard that applies to that unit (e.g. Centrifugal Compressors 1a-3a are subject to the standards at 60.5380(a)(1) and (2) since we use a control device to reduce emissions)** | **Check this box if VRU is reducing Storage Vessel emissions and the facility is subject to the requirements under 60.5411(b) and (c)** |  |
| NSPS  40 CFR Part  60 Subpart  OOOOa | Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 | If there is a standard or other requirement, then the facility is an “affected facility.” Currently there are standards for: gas wells (60.5375a); centrifugal compressors (60.5380a); reciprocating compressors (60.5385a): controllers (60.5390a); storage vessels (60.5395a); fugitive emissions at well sites and compressor stations (60.5397a); equipment leaks at gas plants (60.5400a); sweetening units (60.5405a).  **If standards apply, list the unit number(s) and regulatory citation of the standard that applies to that unit (e.g. Centrifugal Compressors 1a-3a are subject to the standards at 60.5380(a)(1) and (2) since we use a control device to reduce emissions)** | **Check this box if VRU is reducing Storage Vessel emissions and the facility is subject to the requirements under 60.5411a(b) and (c)** |  |
| NSPS  40 CFR Part 60 Subpart IIII |  | See 40 CFR 60.4200(a) 1 through 4 to determine applicable category and state engine size, fuel type, and date of manufacture. | **Table 1 or Table 2 to Subpart IIII attached with emission standards applicable to each engine highlighted.** |  |
| NSPS  40 CFR Part 60 Subpart JJJJ |  | See 40 CFR 60.4230(a), 1 through 5 to determine applicable category and state engine size, fuel type, and date of manufacture. | **Table 1 to Subpart JJJJ is attached with emission standards applicable to each engine highlighted.** |  |
| MACT  40 CFR 63, Subpart A | General Provisions | Applies if any other subpart applies. |  |  |
| MACT  40 CFR 63 Subpart ZZZZ | National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (**RICE MACT**) | Facilities are subject to this subpart if they own or operate a stationary RICE, except if the stationary RICE is being tested at a stationary RICE test cell/stand. | **Table 1, 2, 3, 4, 5, 6, and/or 7 to Subpart ZZZZ is attached with emission standards/requirements applicable to each engine highlighted.** |  |

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

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

|  |  |
| --- | --- |
| Version Date | Changes Incorporated |
| October 06, 2022 | Addition of Part 50 definitions and applicability, additional instructions for representing VRU and flare alternate scenarios, clarified instructions in Section 3. |
| November 30, 2022 | Added instructions for Engine options to Section 3. |
| May 3, 2022 | Added construction status requirements to Part 50 NMAC justification. |
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