

FYI - NOTICE

JULY 25, 1997

The Air Quality Division (AQD) has developed an effective internal process for simplifying Title V Applicability Determinations for gas compressor stations at Exploration and Production sites. The basics are as follows:

FOR 0-50 TPY CRITERIA POLLUTANT OR 0-5 TPY HAP PER SITE

1. DEQ/AQD will declare compressor stations to be de minimis and not subject to permitting provided that a responsible company official submits to the Department a letter stating:
 - a. That the Potential to Emit (PTE), without controls, for the facility is less than 50 tons per year (TPY) for any Criteria Pollutant and/or less than 5 TPY for any Hazardous Air Pollutant (HAP);
 - b. That the source is not a synthetic minor; and
 - c. No form or emission calculation is necessary for this certification.

FOR 50-100 TPY CRITERIA POLLUTANT OR 5-10 TPY HAP PER SITE

2. The Department may determine that compressor stations which have a PTE of more than 50 but less than 100 TPY Criteria Pollutant and/or 5-10 TPY HAP and are engaged in exploration and production (E&P) are not subject to permitting requirements provided that a responsible official submits to the Department documentation sufficient to verify that the PTE is less than 100 TPY Criteria Pollutant and/or less than 10 TPY HAP.
3. A one-page form (attached) has been developed to assist applicants in providing the information required in #2.

Note that it is possible that a source/facility with less than 5 TPY HAPs could be subject to a Maximum Achievable Control Technology (MACT) standard promulgated by EPA. In that case, the source/facility may still use these procedures.

Any source in either of the above categories that is currently operating under a DEQ Air Quality permit may choose to relinquish that permit by (1) submitting a request to AQD for an Applicability Determination to confirm their status (a fee of \$250.00 is required) and (2) requesting that the Department revoke the existing permit.

Non-permitted facilities will not be routinely inspected; however, the Department is required by law to determine compliance and obtain emission inventories, so an occasional inspection or request for information may be in order.

If you have any questions regarding this process, please contact Ray Bishop at (405)702-4185.

Compressor Station Certification Form

50-100 TPY

COMPANY NAME							
Facility Name							
Mailing Address							
City				State		Zip	
Contact Person				Title		Phone	
Facility Type: CHECK ONE		Facility Associated with Oil & Gas Exploration and Production [per 52 O.S. §139(B)(1)(a) through (k)]				Other	
Legal Description		Section		Township		Range	
Physical Address or Driving Directions							
City or Nearest Town				Zip		County	
LIST ALL CURRENT DEQ AIR QUALITY PERMIT NUMBERS AT THIS FACILITY (if any)							

Please list all emission units located at the facility in the attached table and provide the information requested in order to document that facility emissions meet the criteria to be considered engaged in exploration and production. Typically, compressor station emission units may include some or all of the following; engines, dehydrator combustion vents, dehydrator reboiler vents, flares, amine units and storage tanks. In the "size" column indicate the engineering data that is used in the emission calculation such as engine horsepower, tank size and throughput, fired duty of the glycol reboiler, etc. In the "Basis" column indicate the method used to determine emissions such as manufacturer's data, AP-42, Tanks 3.0, GRIGLYCALC, APITANKCALC, stack tests, etc.

Attachment A: Emissions Information

Unit No.	Max. Hours of Operations Daily/Weekly	Pollutant Emissions							Size	Basis for Emission	Type of Control Equipment	Control Equipment Manufacturer And Model No.	Control Equipment Efficiency	
		lb/hr			ton/yr								% By Weight	Basis
		Uncontrolled			Controlled									
		NOx	CO	NMHC	NOx	CO	NMHC	SOx						

FUEL: is Equipment on Site Fueled by Pipeline Grade Natural Gas? <=Yes <=No (Attach Fuel Analysis)

CERTIFICATION	
I certify that the facility described above is a compressor station which has the potential to emit between 50 & 100 tons per year without control equipment and is not currently the subject of a valid air quality permit.	
Responsible Official {signature}	Date
Responsible Official {typed}	Phone