

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

MEMORANDUM

November 14, 2022

TO: Lee Warden, P.E., Permits and Engineering Group Manager

THROUGH: Richard Kienlen, P.E., Manager, New Source Permits Section

THROUGH: Ryan Buntyn, P.E., New Source Permits Section

FROM: Jennie Doan, E.I., Engineering Section, ROAT

SUBJECT: Evaluation of Permit Application No. **2021-0441-O**
Authorization to Operate under the General Permit for Area Source
NESHAP & Small NSPS Facilities (GP-ASNF/SNF)
Starlite Trailers, Inc.
Claremore Manufacturing Plant (SIC 3799/NAICS 333924)
Facility ID: 1904
Latitude: 36.39040°, Longitude: - 95.55151°
Section 13, Township 22N, Range 16E, Rogers County
Address: 15251 South Highway 66, Unit A, Claremore, OK 74017

SECTION I. INTRODUCTION

Starlite Trailers, Inc. (Starlite) applied for an Authorization to Operate under the GP-ASNF/SNF for their Claremore Manufacturing Plant on October 5, 2021. This facility is currently operating under Title V Permit No. 2015-0456-TVR, issued on October 20, 2016. Facility has been restricting xylene usage by changing coating products. Currently, facility-wide emissions are estimated to be less than 25 TPY for each criteria pollutant, and HAP emissions do not exceed the major threshold of 10 TPY for single HAP and 25 TPY for aggregate HAPs. Since EPA reversed the “once in, always in” policy in January 2021, this facility is no longer required to remain a major source of HAPs and would no longer be an affected source under NESHAP Subpart M. Therefore, the facility may convert their current Title V permit to a general permit under the operation flexibility conditions of OAC 252:100-8-6(f) by demonstrating their ability to operate as a true minor facility.

This facility is subject to NESHAP Subpart C for the 250-gal gasoline storage tank that is used to refuel the forklifts. The facility has demonstrated it is eligible for coverage based on the criteria listed in Part 1, Section III of the GP-ASNF/SNF.

SECTION II. PROCESS DESCRIPTION

The facility manufactures flatbed trailers, standard and gooseneck, as well as some dump type trailers of various sizes and shapes. The trailers are fully assembled and painted at the facility.

Receiving and Assembly

The iron/steel trailer frames are constructed and assembled by cutting and welding according to specifications. Trailers typically range from six (6) feet to forty (40) feet in length. All trailers are built in response to customer’s demand; therefore, it is impossible to accurately predict or calculate production rates based on trailer size, type or quantity. The facility conservatively estimates a maximum of 1,700 tons of steel that is annually turned into trailers. Material usage (paint and solvent) is set to accommodate production.

Paint Prep and Painting

Once the frames are assembled, they are prepped for paint by sanding, buffing, and taping. A top coat is applied to every trailer, whereas primer is upon customer demand only. The facility has a single paint booth large enough to hold one large trailer or two smaller trailers at one time. The paint booth (EU #1) is equipped with 99% efficient particulate filtration and an HVLP spray gun. The facility’s VOC and HAP emissions from coating operations are uncontrolled. The facility typically operates a single 9 hrs/day and 5 days/week shift (2,340 hrs/yr). The applicant estimates an annual maximum coating usage of 7,500 gallons of topcoat. Maximum usage of 1,000 gallons/year solvent is conservatively estimated by the applicant. A short term 3.0-gal/hr spray coating rate is conservatively estimated, since the largest trailer manufactured at this facility requires 5 gallons of paint and 2.5 hours.

Drying

Once the frames are painted, they are set inside the paint shop or in bay 3 of the prep/lumber/tire shop for drying.

Lumber/Flooring/Wiring

Once the frames are dried, they are wired and transferred to the flooring shop. In the flooring shop the floors are cut from lumber and installed on the frames. Once the floor is installed, they are transferred to the tire shop.

Finalization and Shipping

Once the painted and floored frames are in the tire shop, they receive lights, tires and wheels, and pin striping. After going through electrical testing, the now completed trailer is prepared for shipping.

SECTION III. EQUIPMENT

EU	Description	Installation Date
1	Paint Booth	1996

EU	Description	Installation Date
2	Plasma Cutting (2 units)	2011
3	Welding	1979
4	Grinding	1979
5	250-gal gasoline tank	Prior to 1/10/2008

SECTION IV. EMISSIONS

Unless stated otherwise, the PTE emissions at this facility are based on the number of trailers produced per year. Facility stated that they operate 2,340 hours per year (9 hrs/shift, 1 shift/day, 5 days/week, and 52 weeks/year).

There is only one paint booth, and thus, trailer production is limited by the painting process.

Scenario 1

PTE estimation based on the largest trailer produced at this facility, which requires 2.5 hours to paint.

$$\begin{aligned} \text{Maximum \# trailers/yr} &= (8,760 \text{ hrs/yr}) \div (2.5 \text{ hrs/trailer}) \\ &= 3,504 \text{ trailers/yr} \end{aligned}$$

Scenario 2

PTE estimation based on historical maximum production (2013) of 1,155 trailers (various sizes).

$$\begin{aligned} \text{Maximum \# trailers/yr} &= (1,155 \text{ trailers}) \div (2,340 \text{ hrs/yr}) \times (8,760 \text{ hr/yr}) \\ &= 4,323.8 \text{ trailers} \Rightarrow 4,324 \text{ trailers/yr} \end{aligned}$$

Since Scenario 2 has the greater number of trailers produced, this scenario will be used to estimate emissions at the facility.

PAINT BOOTH

The PTE emissions from paint booth (EU-1) are based on the production of 4,324 trailers per year. Since facility uses various products, the summarized emissions for this process are listed below. Average amount of coating product used per trailer is 5.00 gallons, assuming all trailers are largest size.

Paint Booth’s VOC Emissions

Supercoat Product	Annual Usage	Solid Content ⁽²⁾	Amount of VOC ⁽²⁾	VOC Emissions
	gal/yr	lb/gal	Wt. %	TPY
Primer	368.34	11.77	27.98	0.61
Hot Weather Solvent	736.69	7.48	100.00	2.76
Topcoat	15,007.40	8.68	32.33	21.06
Solvent	2,455.62	6.72	50.00	4.13

Supercoat Product	Annual Usage	Solid Content ⁽²⁾	Amount of VOC ⁽²⁾	VOC Emissions
	gal/yr	lb/gal	Wt. %	TPY
Hardener	3,001.48	9.76	0.00	0.00
Accelerator	50.30	8.17	0.00	0.00
Totals	21,619.82⁽¹⁾	-	-	28.54

⁽¹⁾ Annual usage = 4,324 trailers/year × 5.00 gal/trailer.

⁽²⁾ The solid weight and VOC emission factor are based on SDS.

Paint booth’s HAP emission estimation are based on different paint product’s usage and HAP composition from each paint product. The HAP emission are summarized below.

Paint Booth’s HAPs Emissions

HAPs	Supercoat Product	Composition	Emissions
		Wt. %	TPY
Ethylbenzene	Primer	1.00	0.02
	Topcoat	1.00	0.65
Cumene	Primer	1.00	0.02
Hexamethylene Diisocyanate (HDI)	Hardener	1.00	0.15
Naphthalene	Hot Weather Solvent	10.00	0.28
Totals	-	-	1.12

Paint Booth’s PM₁₀ Emissions

Supercoat Product	Annual Usage	Solid Content ⁽²⁾	Transfer Efficiency ⁽³⁾	Filter Efficiency ⁽³⁾	PM ₁₀ Emissions
	gal/yr	lb/gal	%	%	TPY
Primer	368.34	11.77	65	99	0.01
Hot Weather Solvent	736.69	7.48	65	99	0.01
Topcoat	15,007.40	8.68	65	99	0.23
Solvent	2,455.62	6.72	65	99	0.03
Hardener	3,001.48	9.76	65	99	0.05
Accelerator	50.30	8.17	65	99	7.19E-04
Totals	21,619.82⁽¹⁾	-	-	-	0.33

⁽¹⁾ Annual usage = 4,324 trailers/year × 5.00 gal/trailer.

⁽²⁾ The solid contents are based on SDS.

⁽³⁾ Transfer efficiency is based on manufacturer’s data. The filter efficiency is based on filter test report.

PLASMA ARC CUTTING

PM₁₀ emissions from dry-cutting of metal using a plasma torch are divided between two cutters as follows. Emission factors from plasma torch cutting are taken from “Emission of Fume, Nitrogen Oxides and Noise in Plasma Cutting of Stainless and Mild Steel,” Swedish Institute of Production Engineering Research Document IE-174-93, March 1994. Also, dry cutting factors are the highest factors listed with respect to PM emissions. The emission factors for dry cutting of 5/16” thick

mild stainless steel are the average values from following ranges: 20 – 26 g PM₁₀/min and 4.4 – 5.5 L of NO_x/min.

$$\begin{aligned} \text{PM}_{10} &= (20 \text{ g/min}) \times (60 \text{ min/hr}) \times (1 \text{ lb}/454\text{g}) = 2.64 \text{ lb/hr} \\ &= (26 \text{ g/min}) \times (60 \text{ min/hr}) \times (1 \text{ lb}/454\text{g}) = 3.44 \text{ lb/hr} \\ &= 3.04 \text{ lb/hr (averaged)} \end{aligned}$$

$$\begin{aligned} \text{NO}_x &= (4.4 \text{ L/min}) \times (1 \text{ mol}/22.4 \text{ L}) \times (31.28 \text{ g/mol NO}_x) \times (60 \text{ min/hr}) = 0.38 \text{ lb/hr} \\ &= (5.5 \text{ L/min}) \times (1 \text{ mol}/22.4 \text{ L}) \times (31.28 \text{ g/mol NO}_x) \times (60 \text{ min/hr}) = 0.47 \text{ lb/hr} \\ &= 0.42 \text{ lb/hr (averaged)} \end{aligned}$$

PLASMA#1 is uncontrolled and PLASMA#2 is controlled by a dust collector with 90% efficiency.

Plasma Arc Cutting’s PM₁₀ Emissions

Source	Control Efficiency	Emission Factors	Emissions
	%	lb/hr	TPY
PLASMA#1	0%	3.04	13.32
PLASMA#2	90%	3.04	1.33
Totals	-	-	14.65

Plasma Arc Cutting’s NO_x Emissions

Source	Emission Factors	Emissions
	lb/hr	TPY
PLASMA#1	0.42	1.84
PLASMA#2	0.42	1.84
Totals	-	3.68

WELDING

PM₁₀ emissions from welding of metal is estimated based on a factor of 5.2-lb PM₁₀ per 1,000-lb electrode consumed which is taken from AP-42, Table 12.9-1 (1/95) for the E70C welding rods used.

Welding’s PM₁₀ Emissions

EU	Emission Factor	Rod Usage	PM ₁₀ Emissions
	lb PM ₁₀ /1,000 lb	lb/yr	TPY
3	5.2	90,689	0.24

GRINDING

PM₁₀ emissions from grinding of metal is conservatively estimated based on a factor of 1.7-lb PM₁₀ per ton of steel processed, which is taken from WebFIRE (SCC#30400340). Steel usage is based on the maximum production of 4,324 trailers.

Grinding's PM₁₀ Emissions

EU	Emission Factor	Steel Usage ⁽¹⁾	PM ₁₀ Emissions
	lb PM ₁₀ /1,000 lb	lb/yr	TPY
4	1.7	5,061.5	4.30

⁽¹⁾ Maximum steel usage per year is 1,053.5, which would produce approximately 900 trailers. Extrapolating this steel amount to produce 4,324 trailers results with 5,601.5 lb/yr.

GASOLINE TANK

Emissions from the gasoline tank were calculated using AQD Storage Tank Calculation Tool, which is based on AP-42 (11/19), Section 7.1, and Motor Gasoline RVP 13.

Tank Emissions

Parameter	Data
EU	5
Throughput, gal/yr	250
Liquid in Tank(s)	Unleaded Gasoline
Working/Breathing Method/Tool	AP-42 (11/19), Section 7.1
Control Type	N/A
Total VOC Emissions, TPY	0.02

Facility-Wide Emissions

This facility is under a facility-wide cap for true minor source under GP-ASNF/SNF. The emissions table below summarizes the PTE emissions that this facility can emit if operated at maximum operating hours of 8,760 hours per year.

Facility-Wide Emissions

EU	Description	NO _x	VOC	PM ₁₀
		TPY	TPY	TPY
1	Paint Booth	---	28.54	0.33
2	Plasma Cutting	3.68	---	14.65
3	Welding	---	---	0.24
4	Grinding	---	---	4.30
5	250-gal Gasoline Tank	---	---	0.02
Totals		3.68	28.54	19.54

Facility-Wide HAPs Emissions

HAP Pollutants	Emissions
	TPY
Ethylbenzene	0.67
Cumene	0.02
Hexamethylene Diisocyanate (HDI)	0.15
Naphthalene	0.28
Total	1.12

SECTION V. COMPLIANCE

Tier Classification

This application has been classified as **Tier II** based on the request to convert a Part 70 Operating Permit to a GP-ASNF/SNF. The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the land.

Public Review

The applicant published a “Notice of Filing a Tier II Application” in *The Claremore Daily Progress* a daily newspaper in Rogers County. The notice appeared in the newspaper on October 17, 2021. The notice stated that the application was available for public review at the Will Rogers Library and at the Air Quality Division main office.

The applicant is required to publish a “Notice of Tier II Draft Permit.” On publication of this notice, the 30-day public review period will start. The draft permit will also be available for public review on the Air Quality section of the DEQ web page at <http://www.deq.ok.gov>.

Tribal Review

Tribal Nations will be notified of the draft permit.

Inspection

According to the facility-wide emissions, all the emissions at this facility are under 50 TPY. Therefore, an inspection is not needed.

Fee Paid

The Title V renewal fee of \$7,500 was paid when the application was received by AQD on October 6, 2021. Relying on the operational flexibility language in OAC 252:100-8, the facility is converting the TV permit to a GP-ASNF/SNF and no further fees are due.

Enforcement Case

There is no active enforcement case at this facility.

SECTION VI. SUMMARY

The applicant has demonstrated compliance with the requirements of the GP-ASNF/SNF issued on May 20, 2009. Ambient air quality standards are not threatened at the site. Issuance of the Authorization to Operate is recommended.



AUTHORIZATION TO OPERATE

PURSUANT TO THE TERMS OF THE AREA SOURCE NESHAP FACILITIES & SMALL NSPS FACILITIES GENERAL PERMIT

Air Quality Division
State of Oklahoma
Department of Environmental Quality
707 North Robinson
P.O. Box 1677
Oklahoma City, Oklahoma 73101-1677

Authorization No.: 2021-0441-O
Facility Name: Starlite Trailers, Inc. **SIC Code:** 3799
Facility Location: Section 13, Township 22N, Range 16E, Rogers County, Oklahoma
Company Name: Claremore Manufacturing Plant
Mailing Address: 15251 South Highway 66, Unit A, Claremore, OK 74017
Contact Person: Marty Pope, CEO

This Authorization is issued pursuant to **OAC 252:100-7-15 and 252:100-7-18.**

Authorization is hereby granted the above-named entity to operate the emission units, emission points, and other processes listed herein which are located at the above-described minor facility (Facility) pursuant to the terms of the Area Source Facilities and Small NSPS Facilities General Permit as issued by the Oklahoma Department of Environmental Quality, Air Quality Division, on August 13, 2007. The Authorization addresses only those emission sources listed herein and only while located at the Facility.

DRAFT

Kendall Stegmann
Division Director, AQD

Date

Except as otherwise prohibited or limited by the Permit or this Authorization, the permittee is hereby authorized to operate the following emissions sources and/or conduct the following activities at the referenced site, described in the application received on October 6, 2021. The Evaluation Memorandum, dated November 14, 2022, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein.

I. Emission Units and Numerical Limitations

No emissions limitations are established in this permit, except those that may be included in an applicable New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP), or from limitations established in previously issued state or federal permits for the facility. This general permit establishes facility-wide eligibility requirements of actual emissions less than 40 TPY of any regulated pollutant, and potential emissions below major source levels – less than 100 TPY of any regulated pollutant, less than 10 TPY of any single HAP, and less than 25 TPY of total HAPs. By requesting and accepting coverage under this permit, the permittee states that the facility meets this eligibility requirement. Any additional limitations carried over from previously issued permits must meet this eligibility requirement. Continued compliance with these eligibility requirements shall be determined on a calendar year basis.

II. Monitoring and Recordkeeping Requirements

The permittee shall demonstrate continued compliance with any emissions limitations or any operational conditions as specified in the GP-ASNF/SNF. Records shall be kept demonstrating compliance with facility-wide emissions limitations.

III. Additional Requirements not listed in the GP-ASNF/SNF

Operation	NSPS/NESHAP	Subject?	Explanation
Spray Painting	Subpart HHHHHH	No	Coating operation does not involve MeCl or target HAPs (CR, Pb, MN, Ni, or Cd).
	Subpart XXXXXX	No	This facility's SIC code does not fall under this subpart 9 Metal Fabrication & Finish Facilities SIC Code. No MHAP involved in the operation.
Welding	Subpart XXXXXX	No	This facility's SIC code does not fall under this subpart 9 Metal Fabrication & Finish Facilities SIC Code. No MHAP involved in the operation.
Grinding	Subpart XXXXXX	No	This facility's SIC code does not fall under this subpart 9 Metal Fabrication & Finish Facilities SIC Code. No MHAP involved in the operation.
Gasoline Tank	Subpart CCCCCC	Yes	This tank is an affected source under §63.11111(j). This tank was constructed prior to 11/9/2006, and is considered an existing source under this subpart.

This facility is subject to the applicable NESHAP Subpart CCCCCC requirements for a 250-gal gasoline tank. The facility must comply with NESHAP Subpart CCCCCC requirements.

IV. Equipment Additions/Authorization Modifications

The permittee shall obtain a major source construction permit for any modification that would cause an existing facility to no longer be classified as a minor facility.

The permittee shall obtain a minor source construction permit if necessary to comply with Part 1, Section V.C of the GP-ASNF/SNF. Otherwise, facility modifications may be constructed without a new Authorization, or without a construction permit, so long as facility-wide emissions do not exceed emissions limitations specified in Part 1, Section III.A of the GP-ASNF/SNF.

Part 1, Section V.A of the GP-ASNF/SNF specifies when the permittee shall submit a Notice of Modification to the AQD. Part 1, Section V.B specifies the permittee shall attach a copy of the Notice of Modification to a copy of the Authorization to Operate per recordkeeping requirements. Part 1, Section V.D specifies the permittee shall send to AQD a copy of any initial performance test(s) conducted under NESHAP or New Source Performance Standards (NSPS) requirements.

V. Previous Permits

The current operating under Title V Permit No. 2015-0456-TVR, issued on October 20, 2016. On issuance of this Authorization to Operate (2021-0441-O), all previous Air Quality authorizations and/or permits will be superseded and cancelled.

VI. Equipment List

The following table shows equipment presently operated at the facility, other than de minimis activities. The permittee may change the actual equipment operated or change method of operations so long as potential facility-wide emissions do not exceed eligibility requirements specified in Part 1, Section III.A of the GP-ASNF/SNF and the requirements of Section IV of this authorization are met.

EU	Description	Install. Date
1	Paint Booth	1996
2	Plasma Cutting (2 units)	2011
3	Welding	1979
4	Grinding	1979
5	250-gal gasoline tank	Prior to 1/10/2008

Starlite Trailers, Inc.
Attn.: Marty Pope
carol@starlitetrailers.com
15251 South Highway 66, Unit A
Claremore, OK 74017

Subject: GP-ASNF/SNF Authorization to Operate, Permit No. **2021-0441-O**
Starlite Trailers, Inc.
Claremore Manufacturing Plant (SIC 3799)
Facility ID: 1904
Section 13, Township 22N, Range 16E, Rogers County, Oklahoma

Dear Mr. Pope:

Enclosed is the Authorization to Operate the referenced facility. Please note that this Authorization is issued subject to standard and specific conditions in the GP-ASNF/SNF. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections. A copy of the GP-ASNF/SNF can be found on our website at https://www.deq.ok.gov/wp-content/uploads/air-division/GP_area_source_neshap_permit.pdf. If you are unable to obtain a copy and need to have one mailed to you, you can request it by letter or by calling our office at (405) 702-4100.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the form or submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the permit writer at jennie.doan@deq.ok.gov, or at (918) 293-1615.

Sincerely,

DRAFT

Lee Warden, P.E.
Permits and Engineering Group Manager
AIR QUALITY DIVISION

Enclosure

Cherokee Nation
Attn: Chuck Hoskin, Jr., Principal Chief
P.O. Box 948
Tahlequah, OK 74465

Re: Permit Application No. 2021-0441-O
Starlite Trailers, Inc.
Claremore Manufacturing Plant (SIC 3799)
Section 13, Township 22N, Range 16E, Rogers County, Oklahoma

Dear Mr. Hoskin:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II application referenced above. A Tier II application requires the facility provide a 30-day public comment period on the draft Tier II at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

Copies of draft permits and comment opportunities are also provided to the public on the ODEQ website at the following location:

<https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/>

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,



Lee Warden, P.E.
Permit and Engineer Group Manager
AIR QUALITY DIVISION

Muscogee Creek Nation
Attn: David Hill, Principal Chief
P.O. Box 580
Okmulgee, OK 74447

Re: Permit Application No. 2021-0441-O
Starlite Trailers, Inc.
Claremore Manufacturing Plant (SIC 3799)
Section 13, Township 22N, Range 16E, Rogers County, Oklahoma

Dear Mr. Hill:

The Oklahoma Department of Environmental Quality (ODEQ), Air Quality Division (AQD), has received the Tier II application referenced above. A Tier II application requires the facility provide a 30-day public comment period on the draft Tier II at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

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If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,



Lee Warden, P.E.
Permit and Engineer Group Manager
AIR QUALITY DIVISION

Starlite Trailers, Inc.
Attn.: Marty Pope
carol@starlitetrailers.com
15251 South Highway 66, Unit A
Claremore, OK 74017

Subject: GP-ASNF/SNF Authorization to Operate, Permit No. **2021-0441-O**
Starlite Trailers, Inc.
Claremore Manufacturing Plant (SIC 3799)
Facility ID: 1904
Section 13, Township 22N, Range 16E, Rogers County, Oklahoma

Dear Mr. Pope:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a **Tier II** application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which **you** must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing**;
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (918) 293-1615.

Sincerely,



Lee Warden, P.E.
Permit and Engineer Group Manager
AIR QUALITY DIVISION

NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
Version 1 – Traditional NSR process for a construction permit
Version 2 – Enhanced NSR process for a construction permit
Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

Version 3 – For initial Title V operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating requirements of a construction permit that followed Traditional NSR process

DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT

A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., significant modification to a Title V permit or Title V/Title V renewal permit)... has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.

The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be] located at ...physical address (if any), driving directions, and legal description including county....

In response to the application, DEQ has prepared a draft operating permit [modification] (Permit Number: ...xxxx-xxxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review under Permits for Public Review on the DEQ Web Page: <http://www.deq.ok.gov/>

This draft permit would authorize the facility to emit the following regulated pollutants: (list each pollutant and amounts in tons per year (TPY)) [For facility modifications only, either add: , which represents (identify the emissions change involved in the modification), or add: . The modification will not result in a change in emissions]

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below or as directed through the corresponding online notice. [Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.] A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8.

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45-day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j).

Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are available in the Air Quality section of the DEQ Web page: <http://www.deq.ok.gov/>.

For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-10-21

ACFM	Actual Cubic Feet per Minute	GACT	Generally Achievable Control Technology
AD	Applicability Determination	GAL	Gallon (gal)
AFRC	Air-to-Fuel Ratio Controller	GDF	Gasoline Dispensing Facility
API	American Petroleum Institute	GEP	Good Engineering Practice
ASTM	American Society for Testing and Materials	GHG	Greenhouse Gases
		GR	Grain(s) (gr)
BACT	Best Available Control Technology	H₂CO	Formaldehyde
BAE	Baseline Actual Emissions	H₂S	Hydrogen Sulfide
BBL	Barrel(s)	HAP	Hazardous Air Pollutants
BHP	Brake Horsepower (bhp)	HC	Hydrocarbon
BTU	British thermal unit (Btu)	HCFC	Hydrochlorofluorocarbon
		HFR	Horizontal Fixed Roof
C&E	Compliance and Enforcement	HON	Hazardous Organic NESHAP
CAA	Clean Air Act	HP	Horsepower (hp)
CAM	Compliance Assurance Monitoring	HR	Hour (hr)
CAS	Chemical Abstract Service		
CAAA	Clean Air Act Amendments	I&M	Inspection and Maintenance
CC	Catalytic Converter	IBR	Incorporation by Reference
CCR	Continuous Catalyst Regeneration	ICE	Internal Combustion Engine
CD	Consent Decree		
CEM	Continuous Emission Monitor	LAER	Lowest Achievable Emission Rate
CFC	Chlorofluorocarbon	LB	Pound(s) [Mass] (lb, lbs, lbm)
CFR	Code of Federal Regulations	LB/HR	Pound(s) per Hour (lb/hr)
CI	Compression Ignition	LDAR	Leak Detection and Repair
CNG	Compressed Natural Gas	LNG	Liquefied Natural Gas
CO	Carbon Monoxide or Consent Order	LT	Long Ton(s) (metric)
COA	Capable of Accommodating		
COM	Continuous Opacity Monitor	M	Thousand (Roman Numeral)
		MAAC	Maximum Acceptable Ambient Concentration
D	Day	MACT	Maximum Achievable Control Technology
DEF	Diesel Exhaust Fluid	MM	Prefix used for Million (Thousand-Thousand)
DG	Demand Growth	MMBTU	Million British Thermal Units (MMBtu)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
		MMSCF	Million Standard Cubic Feet (MMscf)
EGU	Electric Generating Unit	MMSCFD	Million Standard Cubic Feet per Day
EI	Emissions Inventory	MSDS	Material Safety Data Sheet
EPA	Environmental Protection Agency	MWC	Municipal Waste Combustor
ESP	Electrostatic Precipitator	MWe	Megawatt Electrical
EUG	Emissions Unit Group		
EUSGU	Electric Utility Steam Generating Unit	NA	Nonattainment
		NAAQS	National Ambient Air Quality Standards
FCE	Full Compliance Evaluation	NAICS	North American Industry Classification System
FCCU	Fluid Catalytic Cracking Unit	NESHAP	National Emission Standards for Hazardous Air Pollutants
FEL	Federally Enforceable Limit(s)		
FESOP	Federally Enforceable State Operating Permit	NH₃	Ammonia
FIP	Federal Implementation Plan		
FR	Federal Register		

NMHC	Non-methane Hydrocarbon	SCFD	Standard Cubic Feet per Day
NGL	Natural Gas Liquids	SCFM	Standard Cubic Feet per Minute
NO₂	Nitrogen Dioxide	SCR	Selective Catalytic Reduction
NO_x	Nitrogen Oxides	SER	Significant Emission Rate
NOI	Notice of Intent	SI	Spark Ignition
NSCR	Non-Selective Catalytic Reduction	SIC	Standard Industrial Classification
NSPS	New Source Performance Standards	SIP	State Implementation Plan
NSR	New Source Review	SNCR	Selective Non-Catalytic Reduction
		SO₂	Sulfur Dioxide
O₃	Ozone	SO_x	Sulfur Oxides
O&G	Oil and Gas	SOP	Standard Operating Procedure
O&M	Operation and Maintenance	SRU	Sulfur Recovery Unit
O&NG	Oil and Natural Gas		
OAC	Oklahoma Administrative Code	T	Tons
OC	Oxidation Catalyst	TAC	Toxic Air Contaminant
		TEG	Triethylene Glycol
PAH	Polycyclic Aromatic Hydrocarbons	THC	Total Hydrocarbons
PAE	Projected Actual Emissions	TPY	Tons per Year
PAL	Plant-wide Applicability Limit	TRS	Total Reduced Sulfur
Pb	Lead	TSP	Total Suspended Particulates
PBR	Permit by Rule	TV	Title V of the Federal Clean Air Act
PCB	Polychlorinated Biphenyls		
PCE	Partial Compliance Evaluation	µg/m³	Micrograms per Cubic Meter
PEA	Portable Emissions Analyzer	US EPA	U. S. Environmental Protection Agency
PFAS	Per- and Polyfluoroalkyl Substance		
PM	Particulate Matter	VFR	Vertical Fixed Roof
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	VMT	Vehicle Miles Traveled
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	VOC	Volatile Organic Compound
POM	Particulate Organic Matter or Polycyclic Organic Matter	VOL	Volatile Organic Liquid
		VRT	Vapor Recovery Tower
ppb	Parts per Billion	VRU	Vapor Recovery Unit
ppm	Parts per Million	YR	Year
ppmv	Parts per Million Volume		
ppmvd	Parts per Million Dry Volume	2SLB	2-Stroke Lean Burn
PSD	Prevention of Significant Deterioration	4SLB	4-Stroke Lean Burn
psi	Pounds per Square Inch	4SRB	4-Stroke Rich Burn
psia	Pounds per Square Inch Absolute		
psig	Pounds per Square Inch Gage		
RACT	Reasonably Available Control Technology		
RATA	Relative Accuracy Test Audit		
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement		
RFG	Refinery Fuel Gas		
RICE	Reciprocating Internal Combustion Engine		
RO	Responsible Official		
ROAT	Regional Office at Tulsa		
RVP	Reid Vapor Pressure		
SCC	Source Classification Code		
SCF	Standard Cubic Foot		