



STEVEN A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

Axel Martinez, Manager
Myall, LLC
4851 Webb Street
Pryor Creek, OK 74361

SUBJECT: Applicability Determination: **2007-021-AD (M-1)**
Facility: Same
Location: Same

Dear Mr. Martinez:

Air Quality has completed the review of temporary emergency generators as summarized in the Evaluation of Applicability Determination No. 2007-021-AD (M-1) (copy enclosed). Based on the information received on November 30, 2011, an Air Quality permit for these changes is not required. Note that an operating permit modification would be required within 60 days of operation if the generators remain in place more than 60 days, whether or not they are used continuously. Records confirming the dates the engines are present shall be maintained by Myall to document that permitting is not required. Note that any emissions caused by operation of these units shall be included in the annual emission inventory, and tons per year calculations required by the existing permit. Permit No. 2007-021-O remains in effect.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact the undersigned at (918) 293-1600. Air Quality personnel are located in the Regional Office at Tulsa, 3105 E. Skelly Drive, Suite 200, Tulsa, OK, 74105.

Sincerely,

Herb Neumann by Richard Kienlen

Herb Neumann
Air Quality Division

Enclosure



#6417

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

MEMORANDUM

December 16, 2011

TO: *PF* Phillip Fielder, Permits and Engr. Group Mgr., Air Quality Division

THROUGH: *JS* Kendal Stegmann, Sr. Environmental Manager, Compliance and Enforcement

THROUGH: *RK* Richard Kienlen, P.E., Engr. Mgr. II, New Source Permits Section

THROUGH: Anthony Maxwell, Peer Review

FROM: Herb Neumann, Regional Office at Tulsa

SUBJECT: Evaluation of Applicability Determination No. 2007-021-AD (M-1)
Myall, LLC
PCO Data Storage Facility (SIC 4931)
4581 Webb Street, Mid America Industrial Park, Pryor, OK
NW/4 SW/4 Sec. 6, T20N, R19E, Mayes County
Driving directions: From intersection of US 412 and US 69, north approximately five miles on US 69, right (east) on Main Street, ¼ mile to Webb St. (N4210 Road), facility is on southeast corner. Security gate at 36.23983°N, 95.33194°W.

INTRODUCTION

Myall operates a data storage facility in the Mid-America Industrial Park near Pryor, OK, under Permit No. 2007-021-O, issued September 27, 2011. The permit was issued in both public and confidential versions, but little of the discussion relates to the proposal for which this determination is requested, so no process description is offered here.

PROPOSAL

Although the facility contains numerous emergency generators, not all portions of the facility are served by the generators. In order to perform facility turnarounds, portable generators are brought in as necessary to facilitate complete shutdowns of existing systems. A worst case described by the facility would require two generators capable of up to 2000 kW each, requiring compression ignition internal combustion engines with aggregate heat input requirements up to 20.46 MMBTUH. Maximum run time for each generator is expected to be no more than 50 hours per year.

EMISSION CALCULATIONS

Making the assumptions that the largest power output (2,922 HP) is necessary and that each unit will be used for 50 hours, and using manufacturer's emission factors for all pollutants yields the following results.

2,922-hp ENGINE EMISSIONS

Pollutant	Emission factor (Lb/hp-hr)	Emissions		
		Lb/hr (each)	TPY (each)	TPY (2)
NO _x	0.01518	44.4	1.11	2.22
CO	0.00198	5.79	0.15	0.29
PM = PM ₁₀	0.00022	0.643	0.016	0.032
PM _{2.5}	0.0002024	0.591	0.015	0.030
SO ₂	0.00033	0.964	0.024	0.048
VOC	0.000264	0.771	0.019	0.039

HAP emissions are much lower than criteria pollutant emissions and are not evaluated.

FEDERAL REGULATIONS

Only those regulations that may apply are addressed.

NSPS, 40 CFR Part 60 [Not Applicable]
Subpart IIII, Stationary Compression Ignition Internal Combustion Engines (CI-ICE), promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. The engines are not affected units under this subpart because they do not meet the definition of "non-road engine" in 40 CFR 1068.30.

NESHAP, 40 CFR Part 63 [Not Applicable]
Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE) affects new and existing engines at area and major sources. According to 40 CFR 63.6590(c)(1), a new RICE at an area source that is subject to NSPS Subpart IIII satisfies this NESHAP through compliance with the NSPS subpart. There are no standards that apply.

OKLAHOMA AIR POLLUTION CONTROL RULES

Only those regulations that may apply are addressed.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
 Subchapter 3 enumerates the primary and secondary ambient air quality standards and the significant deterioration increments. At this time, all of Oklahoma is in "attainment" of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]
The proposed modifications have no effect on the applicability of this Rule.

OAC 252:100-7 (Permits for Minor Facilities) [Applicable]

Subchapter 7 sets forth the permit application fees and the basic substantive requirements of permits for minor facilities. Emissions would be below the 5 TPY criterion that requires a construction permit if the engines are operated as proposed. Regardless of actual operating hours or total emissions, an operating permit modification would be required if the engines are present at the facility 60 days after first operation. A construction permit is not required at this time.

OAC 252:100-19 (Particulate Matter (PM)) [Applicable]

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]

OAC 252:100-29 (Fugitive Dust) [Applicable]

OAC 252:100-31 (Sulfur Compounds) [Applicable]

OAC 252:100-33 (Nitrogen Oxides) [Not Applicable]

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]

OAC 252:100-37 (Volatile Organic Compounds) [Part 7 Applicable]

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]

The proposed modifications have no effect on the applicability of these Rules.

COMPLIANCE

Tier Classification and Public Review

Applicability determinations are not subject to tier determination. 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 states that the applicant owns the land. Information on all permit actions is available for review by the public in the Air Quality section of the DEQ Web page: www.deq.state.ok.us/.

Fee Paid

Applicability determination fee of \$250.

SUMMARY

The proposed generators will have emissions below permit exempt levels and, with the 100 hour per year total use restriction, below the 5 TPY threshold that would require a construction permit. An operating permit modification is required within sixty (60) days of operation. Further, the generators are temporary equipment. Issuance of the Applicability Determination and a letter to Myall are recommended, notifying them that the proposed activity does not require an Air Quality construction permit but a modified operating permit may be required.