

August 11, 2022

Vijay Apte, P.E.
AECOM Technical Services, Inc.
1600 Amphitheatre Parkway
Mountainview, CA 94043

Re: Applicability Determination No. **2019-0668-AD (M-1)**

Dear Mr. Apte:

Air Quality has completed the review of the operation referenced above as summarized in the Evaluation of Applicability Determination No. 2019-0668-AD (M-1) (copy enclosed). Based on the original request received on June 4, 2019, and subsequent updates, it has been determined that the existing Myall facility and the proposed facility would not be considered a single facility for the purposes of NSR and Title V permitting.

This determination is limited to the “planned” facility locations and details listed in the evaluation.

Thank you for your cooperation in this matter. If we may be of further service, please contact our office at (405) 702-4100.

Sincerely,



Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

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

MEMORANDUM

August 11, 2022

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

THROUGH: Travis Couch, Environmental Attorney Supervisor

THROUGH: Brad Flaming, Environmental Programs Manager

THROUGH: Phil Martin, P.E., Engineering Manager, Existing Source Permits Section

FROM: Alex Johnson, E.I., Existing Source Permits Section

SUBJECT: Evaluation of Applicability Determination No. **2019-0668-AD (M-1)**
Myall, LLC
Facility ID: 20889
Mayes County, Oklahoma
Latitude: 36.22186°N, Longitude: 95.32191°W

SECTION I. INTRODUCTION

Myall, LLC (Myall) is evaluating the potential viability of constructing a new facility near its existing facility in Pryor, Mayes County, Oklahoma. Myall has submitted an Applicability Determination (AD), dated May 17, 2022, to determine if the new facility would be required to be collocated with the existing facility. The existing facility is operating under Air Quality Permit #2015-1514-TV (M-2). A Title V Renewal is currently under review. It should be noted that some information in support of this AD has been submitted under the Trade Secret protection of 27A Okla. Stat. (O.S.) § 2-5-105(17).

Myall submitted the AD 2019-0668-AD, dated August 20, 2019, to determine whether these facilities were considered co-located. The determination was made that both facilities were considered separate facilities. Myall submitted this AD due to a change in the plan for these facilities to connect their wastewater treatment systems to the same discharge pipeline and to confirm that the previous determination still stands.

SECTION II. REGULATORY REVIEW

As indicated, Myall is considering the construction of a new facility. Myall believes the new facility would not be considered a collocated facility with the existing facility based on current regulatory requirements. The regulatory requirements are reviewed in this section.

Under Oklahoma Administrative Code (OAC) 252:100-8-2, “major source,” as it pertains to Title V major source permitting and New Source Review (NSR) permitting for Prevention of Significant Deterioration (PSD) sources, is defined as any stationary source or group of stationary sources that:

- a) Are located on one or more contiguous or adjacent properties,
- b) Are under common control, and
- c) Belong to the same Major Group (i.e., have the same two-digit primary standard industrial code (SIC)).

Any group of stationary sources meeting all three criteria are considered part of a “major source” for NSR and Title V permitting purposes. The existing facility is permitted as a major source. Therefore, in order to determine the appropriate NSR/Title V permitting that would be required, Myall needs clarification regarding the collocation status of the proposed new facility.

Myall has indicated that the proposed facility would be under common control and share the same SIC code. Therefore, the new facility would need to be located on one or more contiguous or adjacent properties to satisfy the third criterion.

The new facility is proposed to be at least 1/2 mile from the existing facility’s property border. To further support that the facilities should not be considered collocated with regard to the “common sense notion of a plant,” Myall provided the following details:

- Each facility will have its own infrastructure, including emergency generators.
- Emergency generators at one facility will not support the other facility.
- The facilities will utilize separate electricity substations.
- If one facility could not operate, it would not prevent the other from operating.
- The facilities will not rely on each other for pollution control.

For this modification, Myall wants to confirm whether both facilities using the same wastewater discharge pipeline would cause the facilities to be co-located. AQD does not consider this change to fundamentally alter the co-location status of the facility. Therefore, these two facilities would still be considered separate.

SECTION III. CONCLUSION

Based on a physical distance between the facilities of at least 1/2 mile and the listed operational details, the facilities would be considered separate for PSD and Title V permitting purposes.

It should be noted that this determination is specific to the “planned” locations and operational details described.

SECTION IV. COMPLIANCE

Tier Classification

This application has been determined to be “not subject to tier classifications” based on being a request for an Applicability Determination. Information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page: www.deq.ok.gov

Fees Paid

An applicability determination fee of \$500 was paid on June 1, 2022.

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

ACFM	Actual Cubic Feet per Minute	GEP	Good Engineering Practice
AD	Applicability Determination	GHG	Greenhouse Gases
AFRC	Air-to-Fuel Ratio Controller	GR	Grain(s) (gr)
API	American Petroleum Institute		
ASTM	American Society for Testing and Materials	H₂CO	Formaldehyde
		H₂S	Hydrogen Sulfide
BACT	Best Available Control Technology	HAP	Hazardous Air Pollutants
BAE	Baseline Actual Emissions	HC	Hydrocarbon
BBL	Barrel(s)	HCFC	Hydrochlorofluorocarbon
BHP	Brake Horsepower (bhp)	HFR	Horizontal Fixed Roof
BTU	British thermal unit (Btu)	HON	Hazardous Organic NESHAP
		HP	Horsepower (hp)
		HR	Hour (hr)
C&E	Compliance and Enforcement		
CAA	Clean Air Act	I&M	Inspection and Maintenance
CAM	Compliance Assurance Monitoring	IBR	Incorporation by Reference
CAS	Chemical Abstract Service	ICE	Internal Combustion Engine
CAAA	Clean Air Act Amendments		
CC	Catalytic Converter	LAER	Lowest Achievable Emission Rate
CCR	Continuous Catalyst Regeneration	LB	Pound(s) [Mass] (lb, lbs, lbm)
CD	Consent Decree	LB/HR	Pound(s) per Hour (lb/hr)
CEM	Continuous Emission Monitor	LDAR	Leak Detection and Repair
CFC	Chlorofluorocarbon	LNG	Liquefied Natural Gas
CFR	Code of Federal Regulations	LT	Long Ton(s) (metric)
CI	Compression Ignition		
CNG	Compressed Natural Gas	M	Thousand (Roman Numeral)
CO	Carbon Monoxide or Consent Order	MAAC	Maximum Acceptable Ambient Concentration
COA	Capable of Accommodating	MACT	Maximum Achievable Control Technology
COM	Continuous Opacity Monitor	MM	Prefix used for Million (Thousand-Thousand)
D	Day	MMBTU	Million British Thermal Units (MMBtu)
DEF	Diesel Exhaust Fluid	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
DG	Demand Growth	MMSCF	Million Standard Cubic Feet (MMscf)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMSCFD	Million Standard Cubic Feet per Day
		MSDS	Material Safety Data Sheet
EGU	Electric Generating Unit	MWC	Municipal Waste Combustor
EI	Emissions Inventory	MWe	Megawatt Electrical
EPA	Environmental Protection Agency		
ESP	Electrostatic Precipitator	NA	Nonattainment
EUG	Emissions Unit Group	NAAQS	National Ambient Air Quality Standards
EUSGU	Electric Utility Steam Generating Unit	NAICS	North American Industry Classification System
		NESHAP	National Emission Standards for Hazardous Air Pollutants
FCE	Full Compliance Evaluation	NH₃	Ammonia
FCCU	Fluid Catalytic Cracking Unit	NMHC	Non-methane Hydrocarbon
FESOP	Federally Enforceable State Operating Permit	NGL	Natural Gas Liquids
FIP	Federal Implementation Plan	NO₂	Nitrogen Dioxide
FR	Federal Register	NO_x	Nitrogen Oxides
		NOI	Notice of Intent
GACT	Generally Achievable Control Technology	NSCR	Non-Selective Catalytic Reduction
GAL	Gallon (gal)		
GDF	Gasoline Dispensing Facility		

NSPS	New Source Performance Standards	SNCR	Selective Non-Catalytic Reduction
NSR	New Source Review	SO₂	Sulfur Dioxide
		SO_x	Sulfur Oxides
O₃	Ozone	SOP	Standard Operating Procedure
O&G	Oil and Gas	SRU	Sulfur Recovery Unit
O&M	Operation and Maintenance		
O&NG	Oil and Natural Gas	T	Tons
OAC	Oklahoma Administrative Code	TAC	Toxic Air Contaminant
OC	Oxidation Catalyst	TEG	Triethylene Glycol
		THC	Total Hydrocarbons
PAH	Polycyclic Aromatic Hydrocarbons	TPY	Tons per Year
PAE	Projected Actual Emissions	TRS	Total Reduced Sulfur
PAL	Plant-wide Applicability Limit	TSP	Total Suspended Particulates
Pb	Lead	TV	Title V of the Federal Clean Air Act
PBR	Permit by Rule		
PCB	Polychlorinated Biphenyls	µg/m³	Micrograms per Cubic Meter
PCE	Partial Compliance Evaluation	US EPA	U. S. Environmental Protection Agency
PEA	Portable Emissions Analyzer		
PFAS	Per- and Polyfluoroalkyl Substance	VFR	Vertical Fixed Roof
PM	Particulate Matter	VMT	Vehicle Miles Traveled
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter ≤ 2.5 Micrometers	VOC	Volatile Organic Compound
PM₁₀	Particulate Matter with an Aerodynamic Diameter ≤ 10 Micrometers	VOL	Volatile Organic Liquid
POM	Particulate Organic Matter or Polycyclic Organic Matter	VRT	Vapor Recovery Tower
ppb	Parts per Billion	VRU	Vapor Recovery Unit
ppm	Parts per Million	YR	Year
ppmv	Parts per Million Volume	2SLB	2-Stroke Lean Burn
ppmvd	Parts per Million Dry Volume	4SLB	4-Stroke Lean Burn
PSD	Prevention of Significant Deterioration	4SRB	4-Stroke Rich Burn
psi	Pounds per Square Inch		
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		
SCFD	Standard Cubic Feet per Day		
SCFM	Standard Cubic Feet per Minute		
SCR	Selective Catalytic Reduction		
SER	Significant Emission Rate		
SI	Spark Ignition		
SIC	Standard Industrial Classification		
SIP	State Implementation Plan		