
Section 7

Federal New Source Review

Non-attainment New Source Review (NNSR) permitting is required for each non-attainment pollutant at a greenfield site that results in an emission increase which exceeds the applicable major source threshold. Prevention of Significant Deterioration (PSD) permitting is required for each attainment pollutant and other regulated pollutants (such as H₂S and H₂SO₄) that exceeds the applicable major source threshold. Nueces County is designated as attainment/unclassified for the eight-hour ozone standard and attainment/unclassified for all other criteria pollutants. The emission increases associated with this permit application are summarized and compared to the PSD applicability thresholds in Table 1-1 at the end of Section 1. Included at the end of this section is a Table 1F which summarizes the Federal NSR applicability analysis.

7.1 NNSR Applicability

The Harbor Island Marine Terminal is not located in a nonattainment area for the criteria pollutants. As a result, NNSR is not applicable to the proposed project.

7.2 PSD Applicability

The Harbor Island Marine Terminal is currently a greenfield site for Federal NSR applicability purposes and the project emission increases of VOC, NO_x, CO, SO₂, H₂S, and PM/PM₁₀/PM_{2.5}, are less than the applicable major source thresholds; therefore, PSD review does not apply for any of these pollutants. Because PSD review is not required for any other pollutant, PSD also does not apply to greenhouse gas (GHG) emissions.



**TABLE 1F
AIR QUALITY APPLICATION SUPPLEMENT**

Permit No.: TBD	Application Submittal Date: November 2018
Axis Midstream Holdings, LLC	
RN: TBD	Facility Location: Property is approximately one mile Northwest of Highway 361 Ferry Landing
City: Port Aransas	County: Nueces
Permit Unit I.D.: TBD	Permit Name: Harbor Island Marine Terminal
Permit Activity: <input checked="" type="checkbox"/> New Source <input type="checkbox"/> Modification	
Project or Process Description: Marine Terminal	

Complete for all Pollutants with a Project Emission Increase.	POLLUTANTS								
	Ozone		CO	PM ₁₀	PM _{2.5}	NO _x	SO ₂	H ₂ S	CO _{2e}
	VOC	NO _x							
Nonattainment?	No	No	No	No	No	No	No	No	No
PSD?	No	Yes	Yes	No	No	Yes	Yes	Yes	Yes
Existing site PTE (tpy)?	<250	<250	<250	<250	<250	<250	<250	<250	>75000
Proposed project emission increases (tpy from 2F) ²	157.36	124.26	244.39	9.85	9.85	124.26	90.56	1.00	179,199
Is the existing site a major source?	No	No	No	No	No	No	No	No	No
If not, is the project a major source by itself?	No	No	No	No	No	No	No	No	No
If site is major, is project increase significant?	NA	NA	NA	NA	NA	NA	NA	NA	NA
If netting required, estimated start of construction?	NA								
Five years prior to start of construction	NA			contemporaneous					
Estimated start of operation	NA			period					
Net contemporaneous change, including proposed project, from Table 3F. (tpy)	NA	NA	NA	NA	NA	NA	NA	NA	NA
Major NSR Applicable?	No	No	No	No	No	No	No	No	No

- 1 Other PSD pollutants. [Pb, H₂S, TRS, H₂SO₄, Fluoride excluding HF, etc.]
 2 Sum of proposed emissions minus baseline emissions, increases only.

The representations made above and on the accompanying tables are true and correct to the best of my knowledge.

Samuel Oliver 11/19/2018 Vice President Pipeline Operations

 Signature Title

TABLE 2F
PROJECT EMISSION INCREASE

Pollutant ¹ : VOC				Permit No.: TBD								
Baseline Period: N/A												
	Affected or Modified Facilities ²			Permit No.	A			B		Difference (B-A) ⁶ (tons/yr)	Correction ⁷ (tons/yr)	Project Increase ⁸ (tons/yr)
	FIN	EPN	Facility Name		Actual Emissions ³ (tons/yr)	Baseline Emissions ⁴ (tons/yr)	Proposed Emissions ⁵ (tons/yr)	Projected Actual Emissions (tons/yr)				
1	BERTHCAP	BERTHCAP	Berth Loading Fugitives Emissions Cap	NA	-	-	52.80	-	52.80	-	52.80	
2	MVCU-1 - MVCU-8	MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	NA	-	-	97.19	-	97.19	-	97.19	
3	50-1	50-1	Recycle Tank No. 1	NA	-	-	1.60	-	1.60	-	1.60	
4	50-2	50-2	Recycle Tank No. 2	NA	-	-	1.60	-	1.60	-	1.60	
5	T-COMB-1	T-COMB-1	Temporary Portable Combustion Unit	NA	-	-	0.24	-	0.24	-	0.24	
6	MSS	MSS	MSS Emissions Cap	NA	-	-	0.53	-	0.53	-	0.53	
7	FUG	FUG	Piping Fugitive Components	NA	-	-	3.40	-	3.40	-	3.40	
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TCEQ - 20470(Revised 04/12) Table 2F
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**TABLE 2F
PROJECT EMISSION INCREASE**

Pollutant¹: NO _x				Permit No.: TBD							
Baseline Period: N/A											
	Affected or Modified Facilities²				A			B			
	FIN	EPN	Facility Name	Permit No.	Actual Emissions³ (tons/yr)	Baseline Emissions⁴ (tons/yr)	Proposed Emissions⁵ (tons/yr)	Projected Actual Emissions (tons/yr)	Difference (B-A)⁶ (tons/yr)	Correction⁷ (tons/yr)	Project Increase⁸ (tons/yr)
1	BERTHCAP	BERTHCAP	Berth Loading Fugitives Emissions Cap	NA	-	-	-	-	-	-	-
2	MVCU-1 - MVCU-8	MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	NA	-	-	118.06	-	118.06	-	118.06
3	50-1	50-1	Recycle Tank No. 1	NA	-	-	-	-	-	-	-
4	50-2	50-2	Recycle Tank No. 2	NA	-	-	-	-	-	-	-
5	T-COMB-1	T-COMB-1	Temporary Portable Combustion Unit	NA	-	-	5.57	-	5.57	-	5.57
6	MSS	MSS	MSS Emissions Cap	NA	-	-	0.63	-	0.63	-	0.63
7	FUG	FUG	Piping Fugitive Components	NA	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-
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**TABLE 2F
PROJECT EMISSION INCREASE**

Pollutant¹: CO				Permit No.: TBD								
Baseline Period: N/A												
	Affected or Modified Facilities²			Permit No.	Actual Emissions³ (tons/yr)	A		B		Difference (B-A)⁶ (tons/yr)	Correction⁷ (tons/yr)	Project Increase⁸ (tons/yr)
	FIN	EPN	Facility Name			Baseline Emissions⁴ (tons/yr)	Proposed Emissions⁵ (tons/yr)	Projected Actual Emissions (tons/yr)				
1	BERTHCAP	BERTHCAP	Berth Loading Fugitives Emissions Cap	NA	-	-	-	-	-	-	-	
2	MVCU-1 - MVCU-8	MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	NA	-	-	236.12	-	236.12	-	236.12	
3	50-1	50-1	Recycle Tank No. 1	NA	-	-	-	-	-	-	-	
4	50-2	50-2	Recycle Tank No. 2	NA	-	-	-	-	-	-	-	
5	T-COMB-1	T-COMB-1	Temporary Portable Combustion Unit	NA	-	-	7.42	-	7.42	-	7.42	
6	MSS	MSS	MSS Emissions Cap	NA	-	-	0.84	-	0.84	-	0.84	
7	FUG	FUG	Piping Fugitive Components	NA	-	-	-	-	-	-	-	
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	Page Subtotal⁹:									244.39		
	Project Total:									244.39		

**TABLE 2F
PROJECT EMISSION INCREASE**

Pollutant ¹ :	SO ₂	Permit No.:	TBD
Baseline Period:	N/A		

	Affected or Modified Facilities ²			Permit No.	Actual Emissions ³ (tons/yr)	Baseline Emissions ⁴ (tons/yr)	A		B		Difference (B-A) ⁶ (tons/yr)	Correction ⁷ (tons/yr)	Project Increase ⁸ (tons/yr)
	FIN	EPN	Facility Name				Proposed Emissions ⁵ (tons/yr)	Projected Actual Emissions (tons/yr)					
1	BERTHCAP	BERTHCAP	Berth Loading Fugitives Emissions Cap	NA	-	-	-	-	-	-	-	-	-
2	MVCU-1 - MVCU-8	MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	NA	-	-	90.48	-	90.48	-	-	-	90.48
3	50-1	50-1	Recycle Tank No. 1	NA	-	-	-	-	-	-	-	-	-
4	50-2	50-2	Recycle Tank No. 2	NA	-	-	-	-	-	-	-	-	-
5	T-COMB-1	T-COMB-1	Temporary Portable Combustion Unit	NA	-	-	0.06	-	0.06	-	-	-	0.06
6	MSS	MSS	MSS Emissions Cap	NA	-	-	0.02	-	0.02	-	-	-	0.02
7	FUG	FUG	Piping Fugitive Components	NA	-	-	-	-	-	-	-	-	-
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**TABLE 2F
PROJECT EMISSION INCREASE**

Pollutant ¹ : H ₂ S				Permit No.: TBD							
Baseline Period: N/A											
	Affected or Modified Facilities ²			Permit No.	A				B		Project Increase ⁸ (tons/yr)
	FIN	EPN	Facility Name		Actual Emissions ³ (tons/yr)	Baseline Emissions ⁴ (tons/yr)	Proposed Emissions ⁵ (tons/yr)	Projected Actual Emissions (tons/yr)	Difference (B-A) ⁶ (tons/yr)	Correction ⁷ (tons/yr)	
1	BERTHCAP	BERTHCAP	Berth Loading Fugitives Emissions Cap	NA	-	-	-	-	-	-	-
2	MVCU-1 - MVCU-8	MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	NA	-	-	0.96	-	0.960	-	0.96
3	50-1	50-1	Recycle Tank No. 1	NA	-	-	-	-	-	-	-
4	50-2	50-2	Recycle Tank No. 2	NA	-	-	0.00	-	0.00	-	0.00
5	T-COMB-1	T-COMB-1	Temporary Portable Combustion Unit	NA	-	-	0.03	-	0.03	-	0.03
6	MSS	MSS	MSS Emissions Cap	NA	-	-	0.00	-	0.00	-	0.00
-	FUG	FUG	Piping Fugitive Components	NA	-	-	0.00	-	0.00	-	0.00
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**TABLE 2F
PROJECT EMISSION INCREASE**

Pollutant ¹ : PM/PM _{1.0} /PM _{2.5}				Permit No.: TBD								
Baseline Period: N/A												
	Affected or Modified Facilities ²			Permit No.	Actual Emissions ³ (tons/yr)	A		B		Difference (B-A) ⁶ (tons/yr)	Correction ⁷ (tons/yr)	Project Increase ⁸ (tons/yr)
	FIN	EPN	Facility Name			Baseline Emissions ⁴ (tons/yr)	Proposed Emissions ⁵ (tons/yr)	Projected Actual Emissions (tons/yr)				
1	BERTHCAP	BERTHCAP	Berth Loading Fugitives Emissions Cap	NA	-	-	-	-	-	-	-	-
2	MVCU-1 - MVCU-8	MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	NA	-	-	8.80	-	8.80	-	-	8.80
3	50-1	50-1	Recycle Tank No. 1	NA	-	-	-	-	-	-	-	-
4	50-2	50-2	Recycle Tank No. 2	NA	-	-	-	-	-	-	-	-
5	T-COMB-1	T-COMB-1	Temporary Portable Combustion Unit	NA	-	-	0.28	-	0.28	-	-	0.28
6	MSS	MSS	MSS Emissions Cap	NA	-	-	0.78	-	0.78	-	-	0.78
7	FUG	FUG	Piping Fugitive Components	NA	-	-	-	-	-	-	-	-
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