



Navajo Nation Environmental Protection Agency
Navajo Nation Operating Permit Program

El Paso Natural Gas Company, LLC (EPNG)
Leupp Compressor Station

Permit No: NN OP 22-005

2022

THE NAVAJO NATION



JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

Navajo Nation Environmental Protection Agency –Air Quality Control/Operating Permit Program
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TITLE V PERMIT TO OPERATE

<u>PERMIT #:</u> NN OP 22-005	<u>FACILITY NAME:</u> EL PASO NATURAL GAS COMPANAY- LEUPP COMPRESSOR STATION	<u>LOCATION:</u> LEUPP	<u>COUNTY:</u> COCONINO	<u>STATE:</u> AZ
<u>ISSUE DATE:</u> 08/12/2022	<u>EXPIRATION DATE:</u> 8/12/2027	<u>AFS PLANT ID:</u> 04-005-N0565	<u>PERMITTING AUTHORITY:</u> NNEPA	

ACTION/STATUS: PART 71 OPERATING PERMIT

Philip L. Baca, Division Director
El Paso Natural Gas Company
5151 E. Broadway Suite 1680
Tucson, AZ 85711

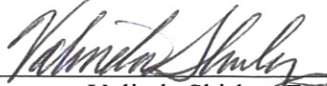
Re: Issuance of Title V Operating Permit to El Paso Natural Gas Company – Leupp Compressor Station

Mr Baca,

This permit is being issued and administered by the Navajo Nation Environmental Protection Agency (“NNEPA”) pursuant to the Delegation Agreement between the United States Environmental Protection Agency (“USEPA” or “EPA”) Region IX and NNEPA, dated October 15, 2004. In accordance with the provisions of Title V of the Clean Air Act, 40 CFR Part 71, Navajo Nation Operating Permit Regulations (“NNOPR”), and all other applicable rules and regulations, the permittee, El Paso Natural Gas Company – Leupp Compressor Station, is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

Terms and conditions not otherwise defined in this permit have the same meaning as assigned to them in the referenced regulation. With the exception of Condition IV(A), which is enforceable by NNEPA only, all terms and conditions of this permit are enforceable by NNEPA and USEPA, as well as by citizens under either or both the Navajo Nation Clean Air Act and the Federal Clean Air Act as applicable. If all proposed control measures and/or equipment are not installed and/or properly operated and maintained, the permittee will be considered in violation of the permit.

This permit is valid for a period of five (5) years and shall expire at midnight on the date five (5) years after the date of issuance unless a timely and complete renewal application has been submitted at least six (6) months but not more than eighteen (18) months prior to the date of expiration. The permit number cited above should be referenced in future correspondence regarding this facility.



Valinda Shirley, Executive Director
Navajo Nation Environmental Protection Agency

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Elizabeth Adams, Director
Air & Radiation Division (Air-3)
US EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

Subject: Final Title V Permit for El Paso Natural Gas Company, LLC – Leupp Compressor Station

Dear Ms. Adams,

Enclosed is a copy of the Final Permit, Statement of Basis and supporting documents for El Paso Natural Gas Company, LLC – Leupp Compressor Station, located at Section 10, Township 22-N, Range 12-E, 8 miles West of Leupp Trading Post in Leupp, Arizona on the Navajo Nation. The Navajo Nation Environmental Protection Agency (“NNEPA”) issues this permit in accordance with the provisions of Title V of the Clean Air Act, 40 CFR Part 71, the Navajo Nation Operating Permit Regulations (“NNOPR”), the 2014 Delegation Agreement between USEPA Region IX and NNEPA, and all other applicable rules and regulations. The Permittee, El Paso Natural Gas Company, LLC – Leupp Compressor Station, is authorized to operate air emission units and to conduct other air pollutant-emitting activities in accordance with the permit conditions listed in this permit.

NNEPA had published El Paso Natural Gas Company, LLC – Leupp Compressor Station’s draft permit public noticed in The Holbrook Tribune, Holbrook, AZ on February 16, 2002; the Arizona Daily Sun, Flagstaff, AZ on February 18, 2022; the Navajo-Hopi Observer, Flagstaff, AZ on February 23, 2022 and the Gallup Independent, Gallup, NM on February 28, 2022. NNEPA also sent out Affected State, Local, and Tribal letters to the Arizona Department of Environmental Quality, New Mexico Environment Department – Air Quality Bureau, Utah Department of Environmental Quality, Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, Hopi Tribe Department of Natural Resources, and the Colorado Department of Public Health and Environment.

The initial public comment period ended on April 4, 2022. On March 10, 2022, NNEPA conducted an informational session (public workshop) on the draft permit renewal and the submission of public comments at the Leupp Chapter House in Leupp AZ. No public hearing was requested from the community. NNEPA has provided responses to one (1) comment mailed to NNEPA, a copy is also attached with the proposed permit.

The proposed permit and the supporting documents are also available on the NNEPA Operating Permit Program website at <http://www.navajoepa.org>

If you have any questions or comments regarding this action, please contact Natasha Yazzie at 928-729-4248 or nyazzie1@navajo-nsn.gov.

A handwritten signature in cursive script, appearing to read "Valinda Shirley".

Valinda Shirley, Executive Director
Navajo Nation Environmental Protection Agency

CC: Lisa Beckham, US EPA Region IX

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TITLE V PERMIT TO OPERATE

<u>PERMIT #:</u> NN OP 22-005	<u>FACILITY NAME:</u> EL PASO NATURAL GAS COMPANY- LEUPP COMPRESSOR STATION	<u>LOCATION:</u> LEUPP	<u>COUNTY:</u> COCONINO	<u>STATE:</u> AZ
<u>ISSUE DATE:</u> 08/12/2022	<u>EXPIRATION DATE:</u> 08/12/2027	<u>AFS PLANT ID:</u> 04-005-N0565	<u>PERMITTING AUTHORITY:</u> NNEPA	

ACTION/STATUS: PART 71 OPERATING PERMIT

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Abbreviations and Acronyms

AFR	Air to Fuel Ratio
AR	Acid Rain
ARP	Acid Rain Program
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
EIP	Economic Incentives Program
EU	Emission Unit
EPNG	El Paso Natural Gas
gal	gallon
HAP	Hazardous Air Pollutant
hp	horsepower
hr	hour
Id. No.	Identification Number
kg	kilogram
lb	pound
MACT	Maximum Achievable Control Technology
Mg	megagram
MMBtu	million British Thermal Units
mo	month
MVAC	Motor Vehicle Air Conditioner
NERC	North American Electric Reliability Corporation
NESHAP	National Emission Standards for Hazardous Air Pollutants
NNEPA	Navajo Nation Environmental Protection Agency
NNOPR	Navajo Nation Operating Permit Regulations
NNR	Navajo Nation Regulations
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate Matter
PM-10	Particulate Matter less than 10 microns in diameter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
psia	pounds per square inch absolute
RMP	Risk Management Plan
scf	standard cubic foot
SNAP	Significant New Alternatives Program
SO ₂	Sulfur Dioxide
tpy	tons per year
TSP	Total Suspended Particulate
US EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

I. Source Identification

- Parent Company Name: Kinder Morgan, Inc.
- Parent Company Address: 1001 Louisiana St., Ste 1000
Houston, Texas 77002
- Plant Operator : El Paso Natural Gas Company, LLC (EPNG)
- Plant Operator Address: 2 North Nevada Avenue
Colorado Springs, CO 80903
- Plant Name: Leupp Compressor Station
- Plant Location: Section 10, Township 22-N, Range 12-E
8 miles West of Leupp Trading Post, Arizona

- County: Coconino, Arizona
- EPA Region: IX
- Reservation: Navajo Nation
- Company Contact: Richard Duarte Phone: (505) 831-7763
- Responsible Official: Philip L. Baca Phone: (520) 663-4224
- EPA Contact: Lisa Beckham Phone: (415) 972-3811
- Tribal Contact: Natasha Yazzie Phone: (928) 729-4248
Suresh Chaudhary Phone: (928) 729-4249
- SIC Code: 4922
- AFS Plant ID 04-005-N0565
- Description of Process: The facility is a natural gas compressor station that performs gas inlet separation and natural gas compression.
- Significant Emission Units:

Unit ID/ Stack ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
A-01 through A-09	Nine (9) natural gas-fired engines	7.5 MMBtu 860 hp (each)	1953	N/A
A-10 and A-11	Two (2) natural gas-fired engines	16 MMBtu/hr 1720 hp (each)	1954	N/A
B-01 through B-05	Five (5) natural gas-fired engines	14.4 MMBtu/hr 2,000 hp (each)	1956	N/A
C-03	One (1) natural gas-fired regenerative turbine	52.9 MMBtu/hr 4950 hp	1966	N/A
D-01	One (1) natural gas-fired simple cycle turbine	83.9 MMBtu/hr 10,364 hp	2001	N/A
AUX A-02	One (1) natural gas-fired simple cycle turbine for auxiliary power generation	11.0 MMBtu/hr 1,000 hp	Constructed prior to 1971. Relocated to Leupp Station in 1988	N/A
AUX D-02	One (1) natural gas-fired turbine for emergency generator (replaced unit AUX D-01)	8.1 MMBtu/hr 941 hp	2019	N/A

II. Requirements for Specific Units

II.A. Performance Testing Schedule

The permittee shall conduct performance tests according to the procedures in Condition III.A, to determine emissions of NO_x, CO, and VOC as follows [40 CFR § 71.6(a)(3)(i)(B)]:

1. For engines A-01 through A-11 and B-01 through B-05, during this five-year permit term the permittee shall initiate a testing schedule that ensures each engine will be tested at least once every 15 calendar years for NO_x, CO, and VOC. Testing for these pollutants shall occur simultaneously. At least 5 engines shall be tested during this permit term.
2. For turbines C-03 and D-01, during this five-year permit term the permittee shall conduct performance tests for NO_x, CO, and VOC. Testing for NO_x, CO, and VOC shall occur simultaneously. Thereafter, the permittee shall implement a testing schedule that ensures each turbine is tested at least once every 5 calendar years for NO_x, CO, and VOC.

II.B. NSPS General Provisions

The following requirements apply to gas turbine D-01 and emergency engine AUX D-02 in accordance with 40 CFR Part 60, Subpart A (“General Provisions”):

1. All requests, reports, applications, submittals, and other communications to the Administrator pursuant to 40 CFR § 60 shall be submitted in accordance to Condition IV.E. [40 CFR § 60.4(a)]
2. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR § 60.7(b)]
3. The availability to the public of information provided to, or otherwise obtained by, the US EPA Administrator under this permit shall be governed by 40 CFR Part 2. (Information submitted voluntarily to the US EPA Administrator for the purposes of 40 CFR §§ 60.5 and 60.6 is governed by 40 CFR §§ 2.201 through 2.213 and not by 40 CFR § 2.301). [40 CFR § 60.9]
4. Compliance with standards in 40 CFR Part 60, other than opacity standards, shall be determined in accordance with performance tests established by 40 CFR § 60.8, unless otherwise specified in the applicable standard. Compliance with the fuel sulfur standard listed in Section II.C.1 of this permit shall be determined in accordance with performance tests established by 40 CFR § 60.8 or with Section II.C.2 of this permit. [40 CFR § 60.11(a)]
5. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate this facility,

including associated air pollution control equipment, as efficiently as possible in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR § 60.11(d)]

6. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in 40 CFR Part 60, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR § 60.11(g)]
7. The permittee shall not build, erect, install, or use any article, machine, equipment, or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR § 60.12]
8. With respect to applicable NSPS provisions under 40 CFR Part 60, the permittee shall comply with the general notification and reporting requirements found in 40 CFR § 60.19. [40 CFR § 60.19]
9. The permittee shall provide to NNEPA and US EPA Region IX written notification or, if acceptable to NNEPA, US EPA Region IX, and the permittee, electronic notification of any reconstruction of an affected facility or any physical or operational change to an affected facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under this permit or in 40 CFR § 60.14(e), in accordance with 40 CFR § 60.7(a). [40 CFR § 60.7(a)]

II.C. NSPS for Stationary Gas Turbines

The following requirements apply to gas turbine D-01 in accordance with 40 CFR Part 60, Subpart GG (“Standards of Performance for Stationary Gas Turbines”):

1. The permittee shall not burn any gaseous fuel in gas turbine D-01 which contains a maximum total sulfur content exceeding 20.0 grains/100 scf. [40 CFR § 60.331(u)]
2. The permittee has elected not to monitor the total sulfur content of the gaseous fuel combusted in gas turbine D-01 by combusting only natural gas which meets the definition of natural gas in 40 CFR § 60.331(u). The permittee is required to demonstrate the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less. [40 CFR § 60.334(h)(3)]

3. To demonstrate compliance under 40 CFR § 60.334(h)(3), the permittee will provide a copy of the gas quality section of its current tariff from the Federal Energy Regulatory Commission (FERC) and certify at least once every six months that the fuel being fired in gas turbine D-01 satisfies the definition of “natural gas” in 40 CFR § 60.331(u). [40 CFR § 60.334(h)(3)]
4. The permittee shall not cause to be discharged into the atmosphere from gas turbine D-01 any gases which contain nitrogen oxide in excess of the following [40 CFR § 60.332(a)(2)]:

$$\text{STD} = 0.015 \times (14.4 / Y) + F$$

where:

STD = allowable ISO corrected (if required as given in 40 CFR § 60.335(b)(1)) NO_x emission concentration (percent by volume at 15 percent oxygen and on a dry basis),

Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour) or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in 40 CFR § 60.332(a)(4).

5. The permittee has determined not to claim the NO_x emission allowance for fuel-bound nitrogen in the above equation. Therefore, the F-value is equal to zero. [40 CFR § 60.332(a)(3)]
6. Gas turbine D-01 is exempt from Section II.B.4 of this permit when being fired with an emergency fuel. [40 CFR § 60.332(k)]
7. Each period during which an exemption provided in Section II.B.6 of this permit is in effect shall be included in the report required in 40 CFR § 60.7(c) and shall include the type, reasons, and duration of the firing of the emergency fuel. [40 CFR § 60.334(j)(4)]
8. The permittee shall continuously monitor turbine D-01 and record whether or not the turbine is operating in SoLoNO_x lean premix mode. The results shall be recorded and included in the semi-annual monitoring reports required by Section III.C.1. [40 CFR § 60.334(f)(2)]
9. At least once during the permit term, the permittee shall conduct or cause to be conducted performance tests (as described in 40 CFR § 60.8) for NO_x on the exhaust of turbine D-01. The performance tests shall be conducted to determine the current emission rate NO_x lb/hr and NO_x ISO emission concentration (percent by volume at 15 percent oxygen and on a dry basis) of the turbine. The test shall be conducted using EPA Method 7E (determination of nitrogen oxide emissions from stationary sources). The test for NO_x shall be conducted at no

less than 80% of the maximum operating capacity given ambient conditions during the test of the turbine being tested. [40 CFR § 71.6(a)(3)(i)(B) and (C); 71.6(a)(3)(ii); 71.6(c)(1)]

10. For performance tests conducted as required by Section II.B.9 of this permit, sampling traverse points are to be selected following Method 20 or Method 1 (non-particulate procedures) and sampled for equal time intervals. The sampling shall be performed with a traversing single-hole probe or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points. [40 CFR § 60.335(a)(4)]
11. The permittee shall determine compliance with the applicable nitrogen oxides emission limitation in Section II.B.4 and 40 CFR § 60.332 and shall meet the performance test requirements of 40 CFR § 60.8 as follows: [40 CFR § 60.335(b)(1)]

- a. For each run of the performance test, the mean nitrogen oxides emission concentration (NO_{X_o}) corrected to 15 percent O_2 shall be corrected to ISO standard conditions using the following equation. Notwithstanding this requirement, use of the ISO correction equation is optional for lean premix stationary combustion turbines, units used in association with heat recovery steam generators (HRSG) equipped with duct burners, and units equipped with add-on emission control devices:

$$NO_X = (NO_{X_o})(P_r/P_o)^{0.5} e^{19(H_o - 0.00633)} (288^\circ K/T_a)^{1.53}$$

Where:

NO_X = emission concentration of NO_X at 15 percent O_2 and ISO standard ambient conditions, ppm by volume, dry basis,

NO_{X_o} = mean observed NO_X concentration, ppm by volume, dry basis, at 15 percent O_2 ,

P_r = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure,

P_o = observed combustor inlet absolute pressure at test, mm Hg,

H_o = observed humidity of ambient air, g H_2O /g air,

e = transcendental constant, 2.718, and

T_a = ambient temperature, °K.

12. The initial 3 run performance test required by 40 CFR § 60.8 must be performed within ± 5 percent at 30, 50, 75, and 90 to 100 percent of peak load or at four evenly-spaced load points in the normal operating range of the gas turbine,

including the minimum point in the operating range and 90 to 100 percent of peak load, or at the highest achievable load point if 90 to 100 percent of peak load cannot be physically achieved in practice. If the turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel. Notwithstanding these requirements, performance testing is not required for any emergency fuel. [40 CFR § 60.335(b)(2)]

II.D. NSPS Emergency Engines

The following requirements apply to emergency engine AUX D-02 in accordance with 40 CFR Part 60, Subpart JJJJ (“Standards of Performance for Stationary Spark Ignition Internal Combustion Engines”):

1. The permittee shall comply with the emission standards over the entire life of the unit AUX D-02 as stated in 40 CFR §60.4233(e), Table 1 and 40 CFR §60.4234:
 - a. NOx: 2.0 g/HP-hr
 - b. CO: 4.0 g/HP-hr
 - c. VOC: 1.0 g/HP-hr
2. The owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in 60.4233 over the entire life of the engine. [40 CFR §60.4234]
3. The operation hours and the purpose of operation for the unit AUX D-02 shall be as described in II.C.3 (a) through (c). [40 CFR §60.4243 (d)(1) through (3)]
 - a. There shall be no limit on operation hours in emergency situations.
 - b. The permittee may operate the unit AUX D-02 for a maximum of 100 hours per calendar year for any combination of purposes specified in paragraph (b)(i).
 - i. The unit AUX D-02 may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition NNEPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance records indicating that federal, state, or local standards require maintenance and testing of the unit AUX D-02 beyond 100 hours per calendar year.

- c. The permittee may operate AUX D-02 for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations shall be counted as part of the 100 hours per calendar year for maintenance and testing. Except as provided in 2(c) (i) of this section, the 50 hours per year for non-emergency situations shall not be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
 - i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
 - A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
 - B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
 - C. The dispatch follows reliability, emergency operation or similar protocols that follow specific North American Electric Reliability Corporation (NERC), regional, state, public utility commission or local standards or guidelines.
 - D. The power is provided only to the facility itself or to support the local transmission and distribution system.
 - E. The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee.
- 4. The permittee shall maintain the unit AUX D-02 according to the manufacturer's emission related written instructions. The permittee shall keep records of conducted maintenance on the engine to demonstrate the compliance, but no performance testing will be required. The permittee shall meet the requirements as specified in 40 CFR part 1068, subparts A through D. If the permittee only adjusts the engine settings according to and consistent with the manufacturer's instructions, the unit AUX D-02 will not be considered out of compliance. [40 CFR § 60.4243(a)(1)].
- 5. If the permittee does not operate and maintain the certified stationary SI internal combustion engine and control devices according to the manufacture's emission-related written instructions, then the engine will be considered a non-

certified engine, and the permittee must demonstrate compliance through a performance test, according to 40 CFR 60.4244, every 8,760 hours or every three years, whichever comes first. [40 CFR § 60.4243(a)(2)(iii); 40 CFR 60.4244].

6. The permittee shall use air to fuel ratio with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times. [40 CFR § 60.4243(g)]
7. The permittee shall install, operate, and properly maintain a non-resettable hour meter to record the total number of hours that AUX D-02 operates. [40 CFR § 60.4237(a)] The permittee shall document the hours spent for emergency and non-emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR § 60.4245(b)]
8. The permittee shall submit, to NNEPA, all documentation supporting all notifications, and maintenance records conducted on the unit AUX D-02. [40 CFR § 60.4245(a)(1), (2)]
9. The permittee shall submit, to NNEPA, the documentation from the manufacturer that the unit AUX D-02 is certified to meet the applicable emission standards in Table 1 to Subpart JJJJ of 40 CFR part 60. [40 CFR § 60.4245(a)(3)]
10. The permittee must submit, to NNEPA, an annual report according to 40 CFR§ 60.4245(e)(1)(i-vi) no later than March 31 of the following calendar year 40 CFR§ 60.4245(e)(2)]

General Provisions:

11. For unit AUX-02, the permittee must comply with those General Provisions in §§60.1 through 60.19 identified in Table 3 to Subpart JJJJ of 40 CFR part 60 [40 CFR § 60.4246].

II.E. NESHAP General Provisions

The following requirements apply to gas-fired emergency generator AUX D-02 in accordance with 40 CFR Part 63, Subpart A (“General Provisions”):

1. The permittee shall submit an initial notification within 120 days after the startup of the emergency engine AUX D-02. The notification shall provide the following information: [40 CFR § 63.9(b)(2)(i) through (v)]
 - a. The name and address of the facility.

- b. The address i.e. physical location of the unit AUX D-02.
- c. An identification of the relevant standard, or other requirement that is the basis of the notification and the source's compliance date.
- d. A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and
- e. A statement of whether the affected source is a major source or an area source.

II.F. NESHAP for Stationary Reciprocating Internal Combustion Engines

The following requirements apply to gas-fired emergency generator AUX D-02 in accordance with 40 CFR Part 63, Subpart ZZZZ (“National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines”):

- 1. The permittee shall submit an initial notification to NNEPA and US EPA not later than 120 days after the startup of the unit AUX D-02. [40 CFR § 63.6645(c)]
- 2. The initial notification shall include the information as in Condition II.E.1 (a) through (e), and a statement that the unit AUX D-02 has no additional requirements, and explain the basis of the exclusion. [40 CFR § 63.6645(f), § 63.9(b)(2)(i) through (v)]

II.G. Compliance Schedule [40 CFR §§ 71.5(c)(8)(iii), 71.6(c)(3)]

- 1. For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.
- 2. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.
- 3. For purposes of this permit, “applicable requirement” means all of the following as they apply to emissions units in a Part 71 source (including requirements that have been promulgated or approved by US EPA through rulemaking at the time of issuance but have future compliance dates):
 - a. Any standard or other requirement provided for in the applicable implementation plan approved or promulgated by US EPA through rulemaking under Title I of the Clean Air Act (“CAA”) that implements the relevant requirements of the CAA, including any revisions to that plan promulgated in 40 CFR Part 52;

- b. Any term or condition of any preconstruction permits issued pursuant to regulations approved or promulgated through rulemaking under Title I, including Parts C or D, of the CAA;
- c. Any standard or other requirement under Section 111 of the CAA, including Section 111(d);
- d. Any standard or other requirement under section 112 of the CAA, including any requirement concerning accident prevention under Section 112(r)(7) of the CAA;
- e. Any standard or other requirement of the acid rain program under Title IV of the CAA or 40 CFR Parts 72 through 78;
- f. Any requirements established pursuant to Section 114(a)(3) or 504(b) of the CAA;
- g. Any standard or other requirement under Section 126(a)(1) and (c) of the CAA;
- h. Any standard or other requirement governing solid waste incineration under Section 129 of the CAA;
- i. Any standard or other requirement for consumer and commercial products under Section 183(e) of the CAA;
- j. Any standard or other requirement for tank vessels under Section 183(f) of the CAA;
- k. Any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the CAA;
- l. Any standard or other requirement of the regulations promulgated at 40 CFR Part 82 to protect stratospheric ozone under Title VI of the CAA, unless the EPA Administrator has determined that such requirements need not be contained in a Title V permit; and
- m. Any national ambient air quality standard or increment or visibility requirement under Part C of Title I of the CAA, but only as it would apply to temporary sources permitted pursuant to Section 504(e) of the CAA.

II.H. Operational Flexibility [40 CFR § 71.6(a)(13)(i)][NNOPR § 404(A)][The NNOPR provision is enforceable by NNEPA only.]

- 1. The permittee is allowed to make a limited class of changes under Section 502(b)(10) of the Clean Air Act within this permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit (whether

expressed therein as a rate of emissions or in terms of total emissions) and are not Title I modifications. This class of changes does not include:

- a. Changes that would violate applicable requirements; or
 - b. Changes that would contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
2. The permittee is required to send a notice to NNEPA and US EPA Region IX at least 7 days in advance of any change made under this provision. The notice must describe the change, when the change will occur, any change in emissions, and identify any permit terms or conditions made inapplicable as a result of the change. The permittee shall attach each notice to its copy of this permit.
 3. Any permit shield provided in this permit does not apply to changes made under this subsection.

III. Facility-Wide or Generic Permit Requirements

Conditions in this section of the permit apply to all emissions units located at the facility. [40 CFR § 71.6(a)(1)]

III.A. Testing Requirements [40 CFR § 71.6(a)(3)]

In addition to the unit-specific testing requirements derived from the applicable requirements for each individual unit contained in Section II of this permit, the permittee shall comply with the following generally applicable testing requirements as necessary to ensure that the required tests are sufficient for compliance purposes:

1. Submit to NNEPA and US EPA Region IX a source test plan 30 days prior to any required testing. The source test plan shall include and address the following elements:
 - 1.0 Purpose of the Test
 - 2.0 Source Description and Mode of Operation during Test
 - 3.0 Scope of Work Planned for Test
 - 4.0 Schedule/Dates
 - 5.0 Process Data to be Collected During Test
 - 6.0 Sampling and Analysis Procedures
 - 6.1 Sampling Locations
 - 6.2 Test Methods
 - 6.3 Analysis Procedures and Laboratory Identification
 - 7.0 Quality Assurance Plan
 - 7.1 Calibration Procedures and Frequency
 - 7.2 Sample Recovery and Field Documentation
 - 7.3 Chain of Custody Procedures
 - 7.4 QA/QC Project Flow Chart
 - 8.0 Data Processing and Reporting
 - 8.1 Description of Data Handling and QC Procedures

8.2 Report Content

2. Unless otherwise specified by an applicable requirement or permit condition in Section II, all source tests shall be performed at maximum operating rates (90% to 110%) of device design capacity.
3. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test. The permittee must keep a record of adjustments made to any operating parameters within two (2) hours of the start of a test, along with the reason for these adjustments, and this record must be submitted to NNEPA and US EPA Region IX along with the test results. NNEPA and US EPA Region IX reserve the right to determine whether any operating adjustments made during a source test that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants should render the source test invalid.
4. During each test run and for two (2) hours prior to the test and two (2) hours after the completion of the test, the permittee shall record the following information:
 - a. Fuel characteristics and/or amount of product processed (if applicable).
 - b. Visible emissions.
 - c. All parametric data which is required to be monitored in Section II for the emission unit being tested.
 - d. Other source-specific data identified in Section II, such as minimum test length (e.g., one hour, 8 hours, 24 hours, etc.), minimum sample volume, other operating conditions to be monitored, correction of O₂, etc.
5. Each source test shall consist of at least three (3) valid test runs and the emissions results shall be reported as the arithmetic average of all valid test runs and in the terms of the emission limit. There must be at least 3 valid test runs, unless otherwise specified.
6. Source test reports shall be submitted to NNEPA and US EPA Region IX within 60 days of completing any required source test.

III.B. Recordkeeping Requirements [40 CFR § 71.6(a)(3)(ii)][40 CFR § 60.7(f)][NNOPR § 302(F)][The NNOPR provision is enforceable by NNEPA only.]

In addition to the unit-specific recordkeeping requirements derived from applicable requirements for each individual unit and contained in Section II, the permittee shall comply with the following generally applicable recordkeeping requirements:

1. The permittee shall keep records of required monitoring information that include the following:
 - a. The date, place, and time of sampling or measurements;

- b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
2. The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

III.C. Reporting Requirements [40 CFR § 71.6(a)(3)(iii)][NNOPR § 302(G)][The NNOPR provision is enforceable by NNEPA only.]

The permittee shall comply with the following generally applicable reporting requirements:

- 1. The permittee shall submit to NNEPA and US EPA Region IX reports of any monitoring required under 40 CFR §§ 71.6(a)(3)(i)(A), (B), or (C) each six-month reporting period from January 1 to June 30 and from July 1 to December 31. All reports shall be submitted to NNEPA and US EPA Region IX and shall be postmarked by the 30th day following the end of the reporting period. Annual report shall be postmarked by January 30 of each year and cover the previous calendar year (January 1 through December 31). All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Section IV.E.
 - a. A monitoring report under this section must include the following:
 - i. The company name and address.
 - ii. The beginning and ending dates of the reporting period.
 - iii. The emissions unit or activity being monitored.
 - iv. The emissions limitation or standard, including operational requirements and limitations (such as parameter ranges), specified in the permit for which compliance is being monitored.
 - v. All instances of deviations from permit requirements, including those attributable to upset conditions as defined in the permit and

including excursions or exceedances as defined under 40 CFR § 64, and the date on which each deviation occurred.

- vi. If the permit requires continuous monitoring of an emissions limit or parameter range, the report must include the total operating time of the emissions unit during the reporting period, the total duration of excess emissions or parameter exceedances during the reporting period, and the total downtime of the continuous monitoring system during the reporting period.
 - vii. If the permit requires periodic monitoring, visual observations, work practice checks, or similar monitoring, the report shall include the total time when such monitoring was not performed during the reporting period and, at the permittee's discretion, either the total duration of deviations indicated by such monitoring or the actual records of deviations.
 - viii. All other monitoring results, data, or analyses required to be reported by the applicable requirement.
 - ix. The name, title, and signature of the responsible official who is certifying to the truth, accuracy, and completeness of the report.
- b. Any report required by an applicable requirement that provides the same information described in Section III.C.1.a.i through ix above shall satisfy the requirement under Section III.C.1.
- c. "Deviation," means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or record keeping established in accordance with 40 CFR §§ 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:
- i. A situation when emissions exceed an emission limitation or standard.
 - ii. A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met.
 - iii. A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.
 - iv. A situation in which an exceedance or an excursion, as defined in the compliance assurance plan at 40 CFR Part 64, occurs.

2. The permittee shall promptly report to NNEPA and US EPA Region IX deviations from permit requirements or start-up, shut-down, or malfunction plan requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of “prompt” or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement does not define prompt or provide a timeframe for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - a. For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
 - b. For emissions of any regulated pollutant excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
 - c. For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report required in Condition III.C.1 of this permit.
3. If any of the conditions in Section III.C.2.a or b of this permit are met, the source must notify NNEPA and US EPA Region IX by telephone, facsimile or electronic mail sent to airquality@navajo-nsn.gov and AEO_R9@epa.gov, based on the timetable listed. A written notice, certified consistent with Section III.C.1.a.ix, must be submitted within 10 working days of the occurrence. All deviations reported under this section must also be identified in the 6-month report required under Section III.C.1.
4. Any application form, report, or compliance certification required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III.D. Stratospheric Ozone and Climate Protection

1. The permittee shall comply with the standards for the labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers in which a Class I or Class II substance is stored or transported, all products containing a Class I substance, and all products directly manufactured with a Class I substance must bear the required warning statement if they are being introduced into interstate commerce pursuant to 40 CFR § 82.106.

- b. The placement of the required warning statement must comply with 40 CFR § 82.108.
 - c. The form of the label bearing the required warning statement must comply with 40 CFR § 82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR § 82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with required practices under 40 CFR § 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with standards for recycling and recovery equipment under 40 CFR § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified through an approved technician certification program pursuant to 40 CFR § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR § 82.152) must comply with recordkeeping requirements pursuant to 40 CFR § 82.166.
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements under 40 CFR § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR § 82.166(k).
3. If the permittee manufactures, transforms, destroys, imports, or exports a Class I or Class II controlled substance, the permittee is subject to all requirements in 40 CFR Part 82, Subpart A.
4. If the permittee performs a service on a motor (fleet) vehicle that involves ozone-depleting refrigerant (or a regulated substitute substance) in the MVAC, the permittee is subject to all requirements in 40 CFR Part 82, Subpart B.

The term “motor vehicle,” as used in Subpart B, does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC,” as used in Subpart B, does not include the air-tight sealed refrigeration systems used for refrigerated cargo or the systems used on passenger buses using HCFC-22 refrigerant.

5. The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable substitute that is listed pursuant to 40 CFR Part 82, Subpart G.

III.E. Asbestos from Demolition and Renovation [40 CFR Part 61, Subpart M]

The permittee shall comply with the requirements of 40 CFR §§ 61.140 through 61.157 for all demolition and renovation projects.

IV. Title V Administrative Requirements

IV.A. Fee Payment [NNOPR Subpart VI][The NNOPR provision is enforceable by NNEPA only]

1. The permittee shall pay an annual permit fee in accordance with the procedures outlined below. [NNOPR §§ 603(A) and (B)]
 - a. The permittee shall pay the annual permit fee by April 1 of each year.
 - b. The fee payment shall be in United States currency and shall be paid by certified check, or corporate check payable to the order of the Navajo Nation Environmental Protection Agency.
 - c. The permittee shall send the fee payment and a completed fee filing form to:

Navajo Nation Air Quality Control Program
Operating Permit Program
P.O. Box 529
Fort Defiance, AZ 86504

2. The permittee shall submit a fee calculation worksheet form with the annual permit fee by April 1 of each year. Calculations of actual or estimated emissions and calculation of the fees owed shall be computed on the fee calculation worksheets provided by the US EPA. Fee payment of the full amount must accompany each fee calculation worksheet. [NNOPR § 603(A)].
3. The fee calculation worksheet shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR § 71.5(d).
4. Basis for calculating the annual fee:

The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all fee pollutants emitted from the source by the applicable emissions fee (in dollars/ton) in effect at the time of calculation. Emissions of any regulated air pollutant that already are included in the fee calculation under a category of regulated pollutant, such as a federally listed hazardous air pollutant that is already accounted for as a VOC or as PM10, shall be counted only once in determining the source's actual emissions. [NNOPR § 602(A) and (B)(1)]

- a. “Actual emissions” means the actual rate of emissions in TPY of any fee pollutant emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit’s actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. Actual emissions shall not include emissions of any one fee pollutant in excess of 4,000 TPY, or any emissions that come from insignificant activities. [NNOPR §§ 602(B)(1), 102(5)]
 - b. Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.
 - c. If actual emissions cannot be determined using the compliance methods in the permit, the permittee shall use other federally recognized procedures.
 - d. The term “fee pollutant” is defined in NNOPR § 102(24).
 - e. The term “regulated air pollutant” is defined in NNOPR § 102(50), except that for purposes of this permit the term does not include any pollutant that is regulated solely pursuant to 4 N.N.C. § 1121 nor does it include any hazardous air pollutant designated by the Director of NNEPA pursuant to 4 N.N.C. § 1126(B).
 - f. The permittee should note that the applicable fee is revised each year to account for inflation and is available from NNEPA starting on March 1 of each year.
 - g. The total annual fee due shall be the greater of the applicable minimum fee and the sum of subtotal annual fees for all fee pollutants emitted from the source. [NNOPR § 602(B)(2)]
5. The permittee shall retain, in accordance with the provisions of 40 CFR § 71.6(a)(3)(ii), all fee calculation worksheets and other emissions-related data used to determine fee payment for five years following submittal of fee payment. Emission-related data include emissions-related forms provided by NNEPA and used by the permittee for fee calculation purposes, emissions-related spreadsheets, records of emissions monitoring data, and related support information.
 6. Failure of the permittee to pay fees in a timely manner shall subject the permittee to the assessment of penalties and interest in accordance with NNOPR § 603(C).
 7. When notified by NNEPA of underpayment of fees, the permittee shall remit full payment within 30 days of receipt of notification.
 8. A permittee who thinks an NNEPA assessed fee is in error and wishes to challenge such fee shall provide a written explanation of the alleged error to

NNEPA along with full payment of the NNEPA assessed fee. NNEPA shall, within 90 days of receipt of the correspondence, review the data to determine whether the assessed fee was in error. If an error was made, the overpayment shall be credited to the account of the permittee.

IV.B. Blanket Compliance Statement [CAA §§ 113(a) and (e)(1), 40 CFR §§ 51.212, 52.12, 52.33, 60.11(g), 71.6(a)(6)]

1. The permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance, including, but not limited to, violation of any applicable requirement; any permit term or condition; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any regulation or order issued by the permitting authority pursuant to Part 71 constitutes a violation of the federal CAA and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [40 CFR §§ 71.6(a)(6)(i) and (ii)]
2. Determinations of deviations, continuous or intermittent compliance status, or violations of this permit are not limited to the applicable testing or monitoring methods required by the underlying regulations or this permit. Other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered in such determinations. [CAA §§ 113(a) and (e)(1), 40 CFR §§ 51.212, 52.12, 52.33, 60.11(g)]

IV.C. Compliance Certifications [40 CFR § 71.6(c)(5)][NNOPR § 302(I)][The NNOPR provision is enforceable by NNEPA only.]

1. The permittee shall submit to NNEPA and US EPA Region IX a semi-annual certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by January 31 and July 31 of each year and covering the previous six month period ending on December 31 and June 30, respectively. The compliance certification shall be certified as to truth, accuracy, and completeness by the permit-designated responsible official consistent with Section IV.E of this permit and 40 CFR § 71.5(d).
2. The certification shall include the following:
 - a. Identification of each permit term or condition that is the basis of the certification.
 - b. Identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period.

If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with

CAA § 113(c)(2), which prohibits knowingly making a false certification or omitting material information.

- c. The compliance status of each term and condition of the permit for the period covered by the certification based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification.
- d. A statement whether compliance with each permit term was continuous or intermittent.

IV.D. Duty to Provide and Supplement Information [40 CFR §§ 71.6(a)(6)(v), 71.5(b)][NNOPR § 301(E)][The NNOPR provision is enforceable by NNEPA only.]

The permittee shall furnish to NNEPA, within a reasonable time, any information that NNEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to NNEPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. (Confidential information may be provided to US EPA IX only, pursuant to 40 CFR § 71.6(a)(6)(v), at the permittee's discretion.) Information claimed to be confidential should be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit to NNEPA such supplementary facts or corrected information. The permittee shall also provide additional information to NNEPA as necessary to address any requirements that become applicable to the facility after this permit is issued.

IV.E. Submissions [40 CFR §§ 71.5(d), 71.6][NNOPR § 103][The NNOPR provision is enforceable by NNEPA only.]

Any document required to be submitted with this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. All documents required to be submitted, including reports, test data, monitoring data, notifications, compliance certifications, fee calculation worksheets, applications for renewals, and permit modifications, shall be submitted to NNEPA and US EPA Region IX, as applicable, at the respective addresses below:

Navajo Nation Air Quality Control Program
Operating Permit Program
P.O. Box 529
Fort Defiance, AZ 86504

For EPA :

Central Data Exchange/Compliance and Emission Data
Reporting Interface (CDX/CEDRI) or in hardcopy through

postal service at the addresses listed below. Items sent by postal service shall be postmarked by the applicable due date identified in this permit.

CDX/CEDRI
<https://cdx.epa.gov>

(First-time users will need to register with CDX. If no specific reporting option is available in CEDRI for Part 71, select “Other Reports.” If the system is unavailable contact EPA Region 9 at these email addresses: AEO_R9@epa.gov and R9AirPermits@epa.gov.)

EPA Region IX Postal Addresses
For Permit Renewal and Modification Applications :
Permits Office Chief, AIR-3-1)
US EPA Region 9
Air and Radiation Division
75 Hawthorne Street
San Francisco, CA 94105-3901

For All Other Submissions :
Manager, Air Section ENF-2-1
US EPA Region 9
Enforcement and Compliance Assurance Division
75 Hawthorne Street
San Francisco, CA 94105-3901

IV.F. Severability Clause [40 CFR § 71.6(a)(5)][NNOPR § 302(A)(5)][The NNOPR provision is enforceable by NNEPA only.]

The provisions of this permit are severable. In the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

IV.G. Permit Actions [40 CFR § 71.6(a)(6)(iii)][NNOPR § 406][The NNOPR provision is enforceable by NNEPA only.]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

IV.H. Administrative Permit Amendments [40 CFR § 71.7(d)][NNOPR § 405(C)][The NNOPR provision is enforceable by NNEPA only.]

The permittee may request the use of administrative permit amendment procedures for a permit revision that:

1. Corrects typographical errors.

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source.
3. Requires more frequent monitoring or reporting by the permittee.
4. Allows for a change in ownership or operational control of a source where NNEPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to NNEPA.
5. Incorporates into the permit the requirements from preconstruction review permits authorized under a US EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR §§ 71.7, 71.8 and § 71.10 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR § 71.6.
6. Incorporates any other type of change which NNEPA has determined to be similar to those listed above in Section IV.H.1 through 5.

IV.I. Minor Permit Modifications [40 CFR § 71.7(e)(1)][NNOPR § 405(D)][The NNOPR provision is enforceable by NNEPA only.]

1. The permittee may request the use of minor permit modification procedures only for those modifications that:
 - a. Do not violate any applicable requirement.
 - b. Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit.
 - c. Do not require or change a case-by-case determination of an emissions limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
 - d. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - i. A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of CAA Title I; and
 - ii. An alternative emissions limit approved pursuant to regulations promulgated under CAA § 112(i)(5).
 - e. Are not modifications under any provision of CAA Title I.

- f. Are not required to be processed as a significant modification.
2. Notwithstanding the list of changes eligible for minor permit modification procedures in Section IV.I.1, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by US EPA.
 3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR § 71.5(c) and shall include the following:
 - a. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - b. The source's suggested draft permit;
 - c. Certification by a responsible official, consistent with 40 CFR § 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
 - d. Completed forms for NNEPA to use to notify affected States and the Administrator as required under 40 CFR §§ 71.8 and 71.10(d).
 4. The permittee may make the change proposed in its minor permit modification application immediately after it files such application. After the permittee makes the change allowed by the preceding sentence, and until NNEPA takes any of the actions authorized by 40 CFR §§ 71.7(e)(1)(iv)(A) through (C), the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the permittee need not comply with the existing permit terms and conditions it seeks to modify. If the permittee fails to comply with its proposed permit terms and conditions during this time period, however, the existing permit terms and conditions it seeks to modify may be enforced against it.
 5. The permit shield under 40 CFR § 71.6(f) may not extend to minor permit modifications.

IV.J. Significant Permit Modifications [40 CFR §§ 71.5(a)(2), 71.7(e)(3)][NNOPR §§ 301(C), 405(E)][The NNOPR provisions are enforceable by NNEPA only.]

1. The permittee must request the use of significant permit modification procedures for those modifications that:
 - a. Do not qualify as minor permit modifications or as administrative amendments.

- b. Are significant changes in existing monitoring permit terms or conditions.
 - c. Are relaxations of reporting or recordkeeping permit terms or conditions.
2. Nothing herein shall be construed to preclude the permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.
 3. The permittee must meet all requirements of Part 71 for applications for significant permit modifications. Specifically, for the application to be determined complete, the permittee must supply all information that is required by 40 CFR § 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

IV.K. Reopening for Cause [40 CFR § 71.7(f)][NNOPR § 406][The NNOPR provision is enforceable by NNEPA only.]

1. NNEPA or US EPA shall reopen and revise the permit prior to expiration under any of the following circumstances:
 - a. Additional requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of 3 or more years.
 - b. NNEPA or US EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - c. NNEPA or US EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and shall be made as expeditiously as practicable.
3. Reopening for cause by NNEPA shall not be initiated before notice of such intent is provided to the permittee by NNEPA at least 30 days in advance of the date that the permit is to be reopened, except that NNEPA may provide a shorter time period in the case of an emergency.
4. Reopening for cause by US EPA shall follow the procedures set forth in 40 CFR § 71.7(g).

IV.L. Property Rights [40 CFR § 71.6(a)(6)(iv)][NNOPR § 302(B)(5)][The NNOPR provision is enforceable by NNEPA only.]

This permit does not convey any property rights of any sort, or any exclusive privilege.

IV.M. Inspection and Entry [40 CFR § 71.6(c)(2)][NNOPR § 302(I)(2)][The NNOPR provision is enforceable by NNEPA only.]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives from NNEPA and US EPA to perform the following:

1. Enter upon the permittee's premises where a Part 71 source is located or emissions-related activity is conducted or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. As authorized by the federal CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

IV.N. Emergency Provisions [40 CFR § 71.6(g)][NNOPR § 305][The NNOPR provision is enforceable by NNEPA only.]

1. In addition to any emergency or upset provision contained in any applicable requirement, the permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in this permit; and
 - d. The permittee submitted notice of the emergency to NNEPA and US EPA within 2 working days of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirements of Section III.C.2 of this permit.

In any enforcement proceeding, the permittee has the burden of proof to establish the occurrence of an emergency.

2. An “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the permittee, including acts of God, which situation requires immediate corrective action to restore normal operation and that causes the source to exceed a technology-based emissions limitation under this permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

IV.O. Transfer of Ownership or Operation [40 CFR § 71.7(d)(1)(iv)][NNOPR § 405(C)][The NNOPR provision is enforceable by NNEPA only.]

A change in ownership or operational control of this facility may be treated as an administrative permit amendment if NNEPA determines no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to NNEPA.

IV.P. Off-Permit Changes [40 CFR § 71.6(a)(12)][NNOPR § 404(B)][The NNOPR provision is enforceable by NNEPA only.]

The permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met:

1. Each change is not addressed or prohibited by this permit;
2. Each change must comply with all applicable requirements and must not violate any existing permit term or condition;
3. Changes under this provision may not include changes or activities subject to any requirement under CAA Title IV or that are modifications under any provision of CAA Title I;
4. The permittee must provide contemporaneous written notice to NNEPA and US EPA Region IX of each change, except for changes that qualify as insignificant activities under 40 CFR § 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change; and
5. The permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit and the emissions resulting from those changes.

IV.Q. Permit Expiration and Renewal [40 CFR §§ 71.5(a)(1)(iii), 71.6(a)(11), 71.7(b), 71.7(c)(1)(i) and (ii)][NNOPR §§ 301(B)(2) and 401(F)][The NNOPR provision is enforceable by NNEPA only.]

1. This permit shall expire upon the earlier occurrence of the following events:

- a. Up to 12 years elapse from the date of issuance to a solid waste incineration unit combusting municipal waste subject to standards under CAA § 129; or
 - b. For sources other than those identified in Section IV.Q.1.a, five years elapse from the date of issuance; or
 - c. The source is issued a Part 70 permit by a US EPA-approved permitting authority.
2. Expiration of this permit terminates the permittee's right to operate unless a timely and complete permit renewal application has been submitted on or before a date six months, but not more than 18 months, prior to the date of expiration of this permit.
3. If the permittee submits a timely and complete permit application for renewal consistent with 40 CFR § 71.5(a)(2), but NNEPA has failed to issue or deny the renewal permit, the permit shall not expire until the renewal permit has been issued or denied.
4. The permittee's failure to have a current Part 71 permit is not a violation of Part 71 until NNEPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to a completeness determination under 40 CFR § 71.7(a)(4), the permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by NNEPA.
5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected State review, and tribal review.
6. The application for renewal shall include the current permit number, description of permit revisions and off-permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application.

THE NAVAJO NATION



JONATHAN NEZ | PRESIDENT

MYRON LIZER | VICE PRESIDENT

Navajo Nation Environmental Protection Agency –Air Quality Control/Operating Permit Program
Post Office Box 529, Fort Defiance, AZ 86504 • Bldg. #2837 Route 112
Telephone (928) 729-4096, Fax (928) 729-4313, Email airquality@navajo-nsn.gov
www.navajoeopa.org

Detailed Information

Permitting Authority: Navajo Nation Environmental Protection Agency

County: Coconino

State: Arizona

AFS Plant ID: 04-005-N0565

Facility: El Paso Natural Gas Company, LLC - Leupp Compressor Station

Document Type: STATEMENT OF BASIS

Part 71 Federal Operating Permit
Statement of Basis

El Paso Natural Gas Company, LLC
Leupp Compressor Station
Permit No. NN OP 22-005

1. Facility Information

a. Permittee

El Paso Natural Gas Company (EPNG)
2 North Nevada Avenue
Colorado Springs, Colorado 80903

b. Facility Location

Section 10, Township 22-N, Range 12-E
8 miles West of Leupp Trading Post, Arizona

c. Contact Information

Facility Contact: Richard Duarte, Sr. EHS Engineer
Phone: (505) 831-7763

Responsible Official: Philip L. Baca, Division Director
Phone: (520) 663-4224

d. Description of Operations, Products:

The facility is a natural gas compressor station which performs gas inlet separation and natural gas compression and transmission.

e. **Permitting and/or Construction History**

This facility was initially constructed in the 1950s. Plants A and B (containing engines A-01 through A-11 and B-01 through B-05) and an auxiliary power unit for the facility (engine AUX A-01) were installed in the 1950s. Plant C was installed with three turbines, two of which are electric-driven. The gas-driven turbine at Plant C (unit C-03) was installed as a simple cycle turbine in 1966 and was converted to a regenerative cycle unit in 1981. An additional auxiliary power unit (turbine AUX A-02) was built prior to 1971 and relocated to EPNG Leupp in 1988.

The initial Title V permit for this facility was issued by US EPA on May 12, 2000. In a letter to US EPA dated December 13, 2000, EPNG Leupp proposed installing a low NOx generator and limiting the hours of operation of the generator to 500 hours per year, providing calculations showing that emissions from the new plant (Plant D) would not exceed the PSD significance thresholds. In a letter dated January 16, 2001, US EPA informed EPNG Leupp that the installation of Plant D was exempt from the PSD requirements because this project would not cause a significant emissions increase, as defined in 40 CFR § 52.21. Plant D, consisting of a gas turbine (unit D-01) and a gas-fired auxiliary power generator (AUX D-01), was installed in 2001. EPNG Leupp submitted a Title V renewal permit application to US EPA on November 11, 2004. However, in a letter to US EPA dated April 13, 2005, EPNG Leupp informed EPA that a conventional generator rather than a low NOx generator had erroneously been installed and proposed limiting the operating hours of AUX D-01 to 100 hours per year to stay within emissions limits. In a letter dated May 20, 2005, US EPA informed EPNG Leupp that an operating limit of 100 hours per year for auxiliary engine AUX D-01 is necessary to ensure that the PTE of the modification does not exceed NOx emissions of 40 tons per year. The operating hours of the auxiliary generator AUX D-01 were limited to 100 hours per twelve month rolling period in the Title V permit issued to EPNG Leupp on May 27, 2008 by NNEPA. AUX A-01, which ceased operation in 2001, was removed from the facility in 2008. In a letter to US EPA dated May 21, 2018, EPNG Leupp proposed installing a new 941-horsepower, natural gas fired emergency generator (AUX D-02) as a replacement for the Unit AUX D-01. Unit AUX D-02 was installed in Plant D on November 19, 2019 and placed into service on February 4, 2021. As discussed further below, this modification did not trigger preconstruction permitting under the Tribal Minor NSR or PSD permitting programs. However, as a new emergency generator, it is subject to provisions for new emergency engines in 40 CFR Part 60, Subpart JJJJ and 40 CFR Part 63, Subpart ZZZZ.

EPNG Leupp's second Title V permit renewal application was received by NNEPA on November 27, 2012 and renewal permit was issued by NNEPA on July 31, 2015. EPNG Leupp's third permit renewal application was received by NNEPA on January 30, 2020.

f. Permitted Emission Units and Control Equipment

Table 1 lists the permitted emission-generating units and activities at the facility.

Table 1. List of Emission Units

Unit ID/ Stack ID	Unit Description	Site Rating	Commenced Construction Date	Control Device
A-01 through A-09	Nine (9) natural gas-fired engines	7.5 MMBtu 860 hp (each)	1953	N/A
A-10 and A-11	Two (2) natural gas-fired engines	16 MMBtu/hr 1720 hp (each)	1954	N/A
B-01 through B-05	Five (5) natural gas-fired engines	14.4 MMBtu/hr 2,000 hp (each)	1956	N/A
C-03	One (1) natural gas-fired regenerative turbine	52.9 MMBtu/hr 4950 hp	1966	N/A
D-01	One (1) natural gas-fired simple cycle turbine	83.9 MMBtu/hr 10,364 hp	2001	N/A
AUX A-02	One (1) natural gas-fired simple cycle turbine for auxiliary power generation	11.0 MMBtu/hr 1,000 hp	Constructed prior to 1971. Relocated to Leupp Station in 1988	N/A
AUX D-02	One (1) natural gas-fired turbine for emergency generator. It replaced the unit AUX D-01.	8.1 MMBtu/hr 941 hp	2019	N/A

g. Insignificant Emissions

This facility also emits pollutants at insignificant levels, as described in 40 CFR § 71.5(c)(11)(ii), as follows:

- i. Fugitive VOC emissions from connections, flanges, open-ended lines, valves, and other components.
- ii. Emissions released during the use of the emergency shutdown system and pressure relief valves.
- iii. Emissions released during blowdown activities (during startup and shutdown).
- iv. Fire pump and air compressor engine emissions.

- v. Emissions released from the facility’s three (3) cooling towers, which each has a maximum throughput rate of 9000 gpm or less.
- vi. Emissions released from any emission unit, operation, or activity that handles or stores a VOC or HAP organic liquid with a vapor pressure less than 1.5 psia.
- vii. Storage tank emissions. Table 2 contains a list of storage tanks present at the facility.

Table 2. List of Storage Tanks

Tank No.	Date Installed	Capacity (gal)	Liquid Stored
T-01	1953	8,225	Oil
T-02	1953	8,225	Oil
T-03	1953	2,000	Oil/Water
T-04	1953	2,000	Oil/Water
T-05	1953	1,000	Used Oil
T-06	1953	1,000	Used Oil
T-07	1953	4,250	Used Oil
T-08	1953	872	Used Oil
T-09	1953	872	Used Oil
T-10	1953	8,225	Oil

h. Emissions Calculations

See Appendix A of this document for detailed emissions calculations.

i. Potential to Emit

Potential to emit (PTE) means the maximum capacity of any stationary source to emit any CAA-regulated air pollutant under the source’s physical and operational design. See 40 C.F.R. § 52.21(b)(4). Any physical or operational limitation on the maximum capacity of EPNG Leupp to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of fuel combusted, stored, or processed, must be treated as part of its design if the limitation is enforceable by US EPA. PTE is meant to be a worst-case emissions calculation and is used in many cases, though not all, to determine the applicability of federal requirements. Actual emissions may be much lower than PTE. The potentials to emit presented in Tables 3 and 4 below were calculated by EPNG and presented in its permit application.

Table 3. Potential to Emit of Criteria Air Pollutants

Emission Unit ID	Regulated Air Pollutants in tons per year (tpy)						
	PM-2.5***	PM-10	SO ₂	NO _x	VOC	CO	Total HAPs
A-01 – A-09	17.1	17.1	0.2	1860.6	130.1	689.9	23.5
A-10 – A-11	8.1	8.1	0.1	935.6	18.4	133.2	11.1
B01 – B05	18.3	18.3	0.2	1811.1	60.0	383.3	25.1
C-03	1.8	1.8	1.0	134.0	13.1	39.0	0.2
D-01	2.9	2.9	1.5	38.6	13.5	47.0	0.4
AUX A-02	0.4	0.4	0.2	16.3	2.7	32.4	0.1
AUX D-02*	0.02	0.02	0.0	1.0	0.53	2.1	0.1
Insignificant Emissions**	less than 5.00	less than 5.00	-	-	less than 5.00	-	negligible
PTE of the Entire Source	53.6	53.6	3.2	4797.2	243.3	1326.9	60.5
Title V Major Source Thresholds	100	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

*This is based on an assumed worst-case 500 hours per year of operation, consistent with the US EPA’s 1995 Seitz memo.

**This is an estimate of emissions from the cooling towers and the fugitive VOC from equipment leaks

*** PM 2.5 is conservatively assumed to be equal to PM-10.

Table 4. Facility-Wide Greenhouse Gas Emissions Potential to Emit

Emission Unit	Greenhouse Gas Emissions (CO ₂ equivalent metric tons)
A-01 – A-09	34,430
A-10 – A-11	16,395
B01 – B05	36,898
C-03	27,128
D-01	43,022
AUX A-02	5,637
AUX D-02*	236
Total	163,746

*This is based on an assumed worst-case 500 hours per year of operation, consistent with the US EPA’s 1995 Seitz memo.

2. Tribe Information

a. General

The Navajo Nation has the largest land base of any tribe in the United States, covering 27,425 square miles in three states: Arizona, Utah, and New Mexico. The Navajo Nation is currently home to more than 300,000 people. Industries on the reservation include oil and natural gas processing, coal mining, and tourism.

b. Local Air Quality and Attainment Status

All areas of the Navajo Nation are currently designated as attainment or unclassifiable for all pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established.

3. Inapplicable Requirements

a. Prevention of Significant Deterioration (PSD)

The EPNG Leupp compressor station is not one of the 28 source categories defined in 40 CFR § 52.21(b)(1)(i)(a) but has the potential to emit more than 250 tons per year of NO_x under 40 CFR § 52.21(b)(1)(i)(b). Therefore, this source is an existing major stationary source under the PSD program.

The addition of auxiliary power unit AUX A-02 in 1988 did not result in a significant emissions increase, as defined in 40 CFR § 52.21. Therefore, the modification was not subject to PSD requirements.

According to a letter from US EPA to EPNG Leupp dated January 16, 2001, the proposed construction of Plant D would not result in a significant emission increase and the modification therefore was not subject to PSD requirements. According to a letter from US EPA to EPNG Leupp on May 20, 2005, an operating limit of 100 hours per year for auxiliary engine AUX D-01 was necessary to ensure that the PTE of the modification did not exceed NO_x emissions of 40 tons per year. Relaxation of the PSD avoidance conditions would trigger PSD review consistent with 40 CFR § 52.21(r)(4).

On May 21, 2018, EPNG Leupp submitted a notification for the installation of a replacement unit for AUX D-01. AUX D-01 was replaced with a 941 hp natural gas-fired emergency generator (AUX D-02). As discussed above, the existing unit, AUX D-01, had an operating limit of 100 hours per year to ensure the installation of the unit did not trigger the PSD program. However, the replacement unit did not trigger PSD permitting because the emissions increase from the project, based on the PTE of the replacement unit (AUX D-02), is below the PSD significant emission rates (SERs) in 40 CFR 52.21(b)(23). Potential emissions from the

replacement unit (AUX D-02) were based on a worst-case 500 hours of operation, consistent with the 1995 Seitz Memo for calculating PTE for emergency generators. Under the PSD permitting program, a replacement unit is treated as an existing emissions unit. Applicability of the PSD program for existing units is based on the actual-to-project actual test in 40 CFR 52.21(a)(2)(iv)(c). This test considers the baseline actual emissions of the existing unit and the projected actual emissions after the modification. In this case, where the PTE of the replacement unit is below the SERs, the baseline actual emissions do not need to be determined to conclude the project does not cause a significant emissions increase. That is, the difference between the new PTE and the baseline actual emissions will always be less than the SERs because the PTE of the replacement unit is already below the SERs. Therefore, the project is not a major modification because it does not cause a significant emissions increase. See 40 CFR 52.21(a)(iv)(a).

The replacement unit, AUX D-02, does not need to be subject to the same 100 hours per year operating limit because the replacement unit does not need such a restriction to avoid PSD permitting. That is, the potential emissions of the replacement unit based on PTE, is less than the existing unit with a 100 hour per year operating limit. This change does not trigger a relaxation under 40 CFR 52.21(r)(4) because the change in operating hours does not make the initial modification a major modification.

In sum, while the EPNG Leupp compressor station is a major stationary source under the PSD program, it has never been required to obtain a PSD permit.

b. Tribal Minor NSR (40 CFR 49.151-161)

On May 21, 2018, EPNG Leupp submitted a notification for the installation of a replacement unit for AUX D-01. The emissions increase from the new unit, as identified in Table 3, are below the Tribal Minor NSR permitting thresholds in 40 CFR 49.153 and did not trigger the need for a preconstruction minor NSR permit. Potential emissions from the new generator were based on a worst-case 500 hours of operation, consistent with the 1995 Seitz Memo for calculating PTE for emergency generators. The replacement did not result in an increase in allowable emissions and, as a result, the project also did not trigger an administrative amendment under the Tribal Minor NSR program pursuant to 40 CFR 49.153(a)(2).

c. New Source Performance Standards (NSPS) for Fossil Fuel Fired Steam Generators (40 CFR §§ 60.40 – 60.46; 40 CFR Part 60, Subpart D), Electric Utility Steam Generating Units (40 CFR §§ 60.40Da – 60.52Da; 40 CFR Part 60, Subpart Da), Industrial-Commercial-Institutional Steam Generating Units (40 CFR §§ 60.40b – 60.49b; 40 CFR Part 60, Subpart Db), Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR §§ 60.40c – 60.48c; 40 CFR Part 60, Subpart Dc)

These regulations apply to steam generators. The Leupp Compressor station does not have any steam generating units, therefore, this subpart does not apply.

d. **New Source Performance Standards (NSPS) for Stationary Combustion Turbines (40 CFR §§ 60.4300 – 60.4420; 40 CFR Part 60, Subpart KKKK)**

On July 6, 2006, standards of performance for stationary combustion turbines (40 CFR §§ 60.4300-60.4420) were promulgated. This subpart applies to stationary combustion turbines that commence construction, modification, or reconstruction after February 18, 2005. This subpart does not apply to the turbines located at EPNG Leupp because the turbines were installed prior to February 18, 2005 and have not been modified or reconstructed.

e. **NSPS for SO₂ Emissions from Onshore Natural Gas Processing for which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and On or Before August 23, 2011(40 CFR §§ 60.640 – 60.648; 40 CFR Part 60, Subpart LLL)**

These regulations apply to sweetening units and sulfur recovery units at onshore natural gas processing facilities. As defined in this subpart, sweetening units are process devices that separate hydrogen sulfide (H₂S) and carbon dioxide (CO₂) from a sour natural gas stream. Sulfur recovery units are defined as process devices that recover sulfur from the acid gas (consisting of H₂S and CO₂) removed from sour natural gas by a sweetening unit. There are no sweetening units or sulfur recovery units located at EPNG Leupp; therefore, this subpart does not apply.

f. **NSPS for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and On or Before August 23, 2011 (40 CFR §§ 60.630 – 60.636; 40 CFR Part 60, Subpart KKK)**

These regulations apply to compressors and other equipment at onshore natural gas processing facilities. As defined in this subpart, a natural gas processing plant is any processing site engaged in the extraction of natural gas liquids (NGLs) from field gas, fractionation of mixed NGLs to natural gas products, or both. NGLs are defined as the hydrocarbons, such as ethane, propane, butane, and pentane that are extracted from field gas. EPNG Leupp neither extracts natural gas liquids from field gas nor fractionates mixed NGLs to natural gas products and thus does not meet the definition of a natural gas processing plant under this subpart. Therefore, subpart KKK does not apply.

g. **NSPS for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978 (40 CFR §§ 60.110 - 60.113; 40 CFR Part 60, Subpart K)**

These regulations apply to storage vessels for petroleum liquids with storage capacities greater than 40,000 gallons and do not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer. There is no storage tank with a capacity greater than 40,000 gallons located on-site. The individual capacities of storage tanks T-01 through T-10 located at EPNG Leupp are less than 40,000 gallons. In addition, all storage tanks at EPNG Leupp were installed in 1953. For these reasons, subpart K does not apply.

h. NSPS for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and Prior to July 23, 1984 (40 CFR §§ 60.110a - 60.115a; 40 CFR Part 60, Subpart Ka)

These regulations apply to storage vessels for petroleum liquids with storage capacities greater than 40,000 gallons and do not apply to petroleum storage vessels with capacities of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer. There is no storage tank with a capacity greater than 40,000 gallons located on-site. The individual capacities of storage tanks T-01 through T-10 located at EPNG Leupp are less than 40,000 gallons. In addition, all storage tanks at EPNG Leupp were installed in 1953. For these reasons, subpart Ka does not apply.

i. NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 (40 CFR §§ 60.110b – 60.117b; 40 CFR Part 60, Subpart Kb)

These regulations apply to storage vessels with capacities greater than or equal to 75 cubic meters (471 bbl). There is no storage tank with a capacity greater than 75 cubic meters located on-site. The individual capacities of storage tanks T-01 through T-10 located at EPNG Leupp are less than 75 cubic meters; therefore, subpart Kb does not apply.

j. NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR §§ 60.4200 – 60.4219; 40 CFR Part 60, Subpart IIII)

These regulations establish emission standards and compliance requirements to control emissions from compression ignition (CI) internal combustion engines (ICE) that commence construction, modification or reconstruction after July 11, 2005, where the CI ICE have been manufactured after specified dates. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. The emission units located at EPNG Leupp are natural gas-fired reciprocating internal combustion engines (RICE) that were constructed prior to July 11, 2005 and have not been modified or reconstructed after July 11, 2005; therefore, subpart IIII does not apply.

k. NSPS for Crude Oil and Natural Gas Production, Transmission and Distribution (40 CFR §§ 60.5360 – 60.5430; 40 CFR Part 60, Subpart OOOO)

These regulations establish emission standards and compliance schedules to control volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. No equipment at the EPNG Leupp was constructed, modified or reconstructed after August 23, 2011; therefore, subpart OOOO does not apply.

l. NSPS for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (40 CFR §§ 60.5360a – 60.5439a; 40 CFR Part 60, Subpart OOOOa)

This regulation applies to affected facilities for which construction, modification or reconstruction commenced after September 18, 2015, including some components of compressor stations. Leupp compressor station does not have any affected equipment that commenced construction, modification or reconstruction after September 18, 2015; therefore, subpart OOOOa does not apply. The unit AUX D-02 is not an affected equipment under Subpart OOOOa.

m. National Emission Standards for Hazardous Air Pollutants (NESHAP) from Oil and Natural Gas Production Facilities (40 CFR §§ 63.760 – 63.779; 40 CFR Part 63, Subpart HH)

These regulations apply to affected units located at oil and natural gas production facilities that are major sources or area sources of hazardous air pollutants (HAPs), as defined in 40 CFR § 63.761, and that process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer, or that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. Affected units for major sources are glycol dehydration units, storage vessels with the potential for flash emissions, groups of ancillary equipment (except compressors) located at natural gas processing plants that are intended to operate in volatile HAP service, and compressors located at natural gas processing plants that are intended to operate in volatile HAP service. Affected units for area sources consist of triethylene glycol (TEG) dehydration units. EPNG Leupp is not an oil or natural gas production facility; therefore, subpart HH does not apply.

n. NESHAP from Natural Gas Transmission and Storage Facilities (40 CFR §§ 63.1270 – 63.1289; 40 CFR Part 63, Subpart HHH)

These regulations apply to natural gas transmission and storage facilities that transport or store natural gas prior to its entrance into a pipeline to a local distribution company or to a final end user and that are major sources of hazardous air pollutants (HAP), as defined in 40 CFR § 63.1271. The facilities covered by this

source category include underground natural gas storage operations and natural gas compressor stations that receive natural gas via pipeline, from underground natural gas storage operations, or from natural gas processing plants. This subpart only applies to facilities that contain affected sources, which consist of glycol dehydration units under 40 CFR § 63.1270(b). The EPNG Leupp compressor station is a natural gas transmission facility potentially subjected to this subpart; however, EPNG Leupp does not have any glycol dehydration units. Therefore, subpart HHH does not apply.

o. NESHAP for Stationary Combustion Turbines (40 CFR §§ 63.6080 – 63.6175; 40 CFR Part 63, Subpart YYYY)

These regulations establish emission and operating limitations for hazardous air pollutant (HAP) emissions from existing, new, or reconstructed stationary combustion turbines located at major sources of HAP emissions as well as compliance requirements related to such limitations. A major source of HAP emissions is a source that emits or has the potential to emit 10 tpy of a single HAP or 25 tpy of a combination of HAPs. Under 40 CFR § 63.6090(b)(4), existing stationary combustion turbines that were constructed or reconstructed on or before January 14, 2003 do not have to meet the requirements of this subpart. EPNG Leupp is a major source of HAP emissions; however, the turbines at the facility were all constructed before January 14, 2003. Therefore, the turbines located at the facility are not subject to subpart YYYY.

p. Acid Rain Program (40 CFR Parts 72 – 78)

These regulations establish general provisions and operating permit program requirements for affected sources containing affected units. EPNG Leupp does not contain any affected units, as specified in 40 CFR § 72.6(a). Therefore, the emission units at EPNG Leupp are not subject to requirements of the Acid Rain Program.

q. Compliance Assurance Monitoring (CAM) Program (40 CFR Part 64)

These regulations apply to pollutant-specific emission units at major sources that are required to obtain 40 CFR part 70 or 71 permits and that meet certain criteria, including using control devices to achieve compliance with emission limitations or standards for the applicable regulated air pollutants. No emission unit at EPNG Leupp uses an add-on control device as defined in 40 CFR § 64.1. Therefore, the requirements of 40 CFR part 64 are not applicable.

4. Applicable Requirements

The following requirements apply to the EPNG Leupp compressor station.

Table 5. Summary of Applicable Federal Requirements

Applicable Requirements	Emission Point/Unit
Federal Air Quality Requirement	A-01 through A-11, AUX A-02, B-01 through B-05, C-03, D-01, AUX-A02, AUX D-02
NSPS General Provisions (40 CFR Part 60, Subpart A)	D-01, AUX D-02
NSPS for Gas Turbines (40 CFR Part 60, Subpart GG)	D-01
NSPS for new emergency engines (40 CFR Part 60, Subpart JJJJ)	AUX D-02
NESHAP General Provisions (40 CFR Part 63, Subpart A)	AUX D-02
NESHAP for RICE (40 CFR Part 63, Subpart ZZZZ)	AUX D-02
Asbestos NESHAP (40 CFR Part 61, Subpart M)	Facility-wide
Protection of Stratospheric Ozone (40 CFR Part 82)	Facility-wide

a. New Source Performance Standard (NSPS) for Stationary Gas Turbines (40 CFR §§ 60.330-60.335; 40 CFR Part 60, Subpart GG):

There are three natural gas-fired turbines (C-03, D-01, and AUX A-02) at EPNG Leupp. Turbine C-03 was constructed before October 3, 1977, the applicability date of this subpart under 40 CFR § 60.330(b). Turbine C-03 was converted from simple cycle to regenerative cycle after the applicability date of this subpart; however, the conversion does not meet the definition of modification under 40 CFR § 60.2 since it did not result in an increase in emissions of a regulated air pollutant. Regenerative cycle turbines with a heat input of less than 100 MMBtu per hour are exempt from the NOx limitations of the NSPS under 40 CFR § 60.332(1).

Auxiliary turbine AUX A-02, which was built in 1971 and relocated to EPNG Leupp in 1988, did not trigger NSPS requirements because the turbine was built prior to October 3, 1977, the applicability date of this subpart.

The 2001 installation of turbine D-01, which has a maximum heat input capacity greater than 10 MMBtu/hr, did trigger the requirements of this subpart under 40 CFR § 60.330(a). Pursuant to 40 CFR Part 60, Subpart GG, EPNG shall comply with the NOx and SO₂ emission limits below for turbine D-01:

- i. Pursuant to 40 CFR § 60.332(a)(2), NOx emissions from turbine D-01 shall not exceed the following:

$$\text{STD} = 0.015 \times (14.4 / Y) + F$$

where:

STD = allowable ISO corrected (if required as given in § 60.335(b)(1)) NO_x emission concentration (percent by volume at 15 percent oxygen and on a dry basis),

Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour, and

F = NO_x emission allowance for fuel-bound nitrogen as defined in 40 CFR § 60.332(a)(4).

- ii. Pursuant to 40 CFR § 60.332(a)(3), EPNG has determined not to claim the NO_x emission allowance for fuel-bound nitrogen in the above equation. Therefore, the F-value is equal to zero.
- iii. Pursuant to 40 CFR § 60.332(k), when fired with natural gas, turbine D-01 is exempt from 40 CFR § 60.332(a)(2) when being fired with an emergency fuel.
- iv. Pursuant to 40 CFR § 60.334(j)(4), each period during which an exemption provided in 40 CFR § 60.332(k) is in effect shall be included in the report required in 40 CFR § 60.7(c), which shall include the type, reasons, and duration of the firing of the emergency fuel.
- v. Since turbine D-01 does not use water or steam injection to control NO_x emissions and was constructed before July 8, 2004, there are no applicable continuous monitoring requirements for the NO_x emissions from turbine D-01 under 40 CFR § 60.334. Compliance with the NO_x emission limit will be demonstrated by conducting performance tests in accordance with the test methods and procedures specified in 40 CFR § 60.335 and 40 CFR § 60.8.
- vi. Pursuant to 40 CFR § 60.333(b), the total sulfur contained in the fuel combusted in any stationary gas turbine shall not exceed 0.8 percent by weight (8,000 ppmw).
- vii. Pursuant to 40 CFR § 60.334(h)(3), EPNG has elected not to monitor the total sulfur content of the natural gas combusted in emission units D-01 by using natural gas that meets the definition in 40 CFR § 60.331(u). EPNG will demonstrate compliance by submitting the gas quality characteristics excerpt from its current tariff from the Federal Energy Regulatory Commission (FERC), which specifies the fuel sulfur content to be below the 20 grains/100 scf limit.

b. NSPS for Stationary Spark Ignition Internal Combustion Engines (40 CFR §§ 60.4230 – 60.4248; 40 CFR Part 60, Subpart JJJJ)

This subpart establishes emission standards and compliance requirements for the control of emissions from stationary spark ignition (SI) internal combustion engines (ICE) that commenced constructions, modification, or reconstruction after June 12, 2006, where the SI ICE are manufactured on or after specified manufacture trigger dates. The manufacture trigger dates are based on the engine type, fuel used and maximum engine horsepower. EPNG Leupp emission unit AUX D-02 has a maximum engine power greater than 500 hp and was manufactured after the July 1, 2007 and installed November 19, 2019. Therefore, AUX D-02 is subject to this subpart. The permittee shall submit a notification and a source test plan to NNEPA and US EPA Region IX, 30 days prior to any required testing.

c. NESHAP for Reciprocating Internal Combustion Engines (40 CFR §§ 63.6580 – 63.6675, 40 CFR 63, Subpart ZZZZ):

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions as well as compliance requirements related to these limitations. The EPNG Leupp compressor station is a major source of HAP emissions and consists of three natural gas-fired turbines, sixteen (16) two-stroke lean-burn (2SLB) engines, and one 4-stroke lean burn auxiliary engine (AUX D-02). Pursuant to 40 CFR § 63.6590(b)(3)(i), the sixteen 2SLB engines, which all have a site rating of more than 500 brake HP, do not have to meet the requirements of this subpart. AUX D-02 is considered an emergency generator because its sole function is to provide back-up power when electric power from the Navajo Tribal Utility Authority is interrupted.

New emergency stationary spark ignition RICE with site ratings more than 500 brake HP that are located at major sources of HAP emissions after August 16, 2004 are required to comply with this subpart in accordance with 40 CFR § 63.6595(a)(3). However, if such emergency RICE do not operate or are not contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR §63.6640(f)(2)(ii) and (iii) then the emergency RICE is only subject to the initial notification requirement in 40 CFR 63.6645(f). See 40 CFR 63.6590(b)(1). AUX D-02 meets this condition and is therefore only subject to an initial notification requirement under this subpart.

d. Asbestos NESHAP (40 CFR Part 61, Subpart M)

EPNG is subject to the national emission standard for asbestos, 40 CFR Part 61, Subpart M, for all renovation and demolition projects, as specified in the permit document.

e. Protection of Stratospheric Ozone (40 CFR Part 82)

EPNG is subject to the requirements for protecting stratospheric ozone under 40 CFR Part 82. Applicable requirements are specified in the permit document.

Table 6. Incorporation of Applicable Requirements into the Part 71 Permit

Requirement	Condition/ Section	Condition in Part 71 Permit	Description/Notes
NSPS - 40 CFR Part 60, Subpart A	60.1	n/a	Applicability (no requirements)
	60.2	n/a	Definitions (no requirements)
	60.3	n/a	Units and abbreviations (no requirements)
	60.4(a)	II.B.1	Submit reports to EPA Region IX and NNEPA
	60.4(b)	n/a	Submit reports to delegated agencies (Tribe is not the delegated authority for NSPS)
	60.5	n/a	Applicability determinations (places requirements on US EPA, not the facility)
	60.6	n/a	Review of plans (places requirements on US EPA, not the facility)
	60.7(a)	II.B.9	Notification of construction or reconstruction (one-time only)
	60.7(b)	II.B.2	Records of startup, shutdown, and malfunction
	60.7(c)	n/a	CEMS reporting (facility has no CEMS)
	60.7(d)	n/a	Report format for CEMS reporting (facility has no CEMS)
	60.7(e)	n/a	Reporting frequency (standard does not require reporting more than semiannually)
	60.7(f)	n/a	Maintain monitoring records (permit requires 5 years)
	60.7(g)	n/a	Notification required by state/local agency (no such notification required)
	60.7(h)	n/a	Disclaimer that subpart may clarify or make inapplicable any general provisions

	60.8	II.C.9	Initial performance tests (performance test for NOx on the exhaust of turbine D-01 to be conducted at least once during permit term)
	60.9	II.B.3	Availability of information
	60.10	n/a	State authority (no requirements)
	60.11(a)	II.B.4	Compliance with non-opacity standards
	60.11(b)	n/a	Compliance with opacity standards (facility is not subject to opacity standard)
	60.11(c)	n/a	Times when opacity standards apply (facility is not subject to opacity standard)
	60.11(d)	II.B.5	Good practice to minimize emissions
	60.11(e)	n/a	Demonstrating compliance with opacity standards (facility is not subject to opacity standard)
	60.11(f)	n/a	Special provisions in subpart supersede general provisions (no requirements)
	60.11(g)	II.B.6	Credible evidence
	60.12	II.B.7	Circumvention
	60.13	n/a	CEMS requirements (facility has no CEMS)
	60.14	n/a	Modifications
	60.15	n/a	Reconstruction
	60.16	n/a	Priority list (no requirements)
	60.17	n/a	Incorporation of test methods by reference
	60.18	n/a	Requirements for flares (facility does not use flares to comply with NSPS)
	60.19	II.B.8	General notification and reporting
NSPS - 40 CFR Part 60, Subpart GG	60.330	n/a	Applicability (no requirements)
	60.331	II.C.1	Definitions (gaseous fuel meets the definition of natural gas in 40 CFR § 60.331(u))
	60.332	II.C.4	Standard for nitrogen oxides (NOx emissions from unit D-01 must be limited as specified in 40 CFR § 60.332(a)(2))
	60.333	II.C.1	Standard for sulfur oxides (fuel sulfur standard)
	60.334(a)	n/a	Monitoring of water/steam, fuel for NOx control (the turbine does not use water injection to control NOx)

	60.334(b) & (c)	n/a	CEMS requirements (facility has no CEMS)
	60.334(d) through (g)	n/a	Monitoring of water/steam, fuel for NOx control for turbines constructed after July 8, 2004 (the turbine does not use water injection and was constructed in 2001)
	60.334(h)	II.C.3	Monitoring of fuel sulfur content not required if the fuel meets definition of natural gas in 40 CFR § 60.331(u)
	60.335	II.C.9- II.C.12	Test methods and procedures
NSPS – 40 CFR Part 60, Subpart JJJJ	60.4230	n/a	Applicability (no requirements)
	60.4233(e)	II.D.1	Emission standards applicable to emergency engines
	60.4234	II.D.2	Emission standard time period
	60.4237(a)	II.D.7	Monitoring requirements
	60.4243 (a)(1)	II.D.4	Compliance requirements
	60.4243 (a)(2)(iii)	II.D.5	Compliance requirements
	60.4243(d) (1) through (3)	II.D.3	Compliance requirements
	60.4243(g)	II.D.6	Compliance requirements
	60.4244	II.D.5	Performance test requirements
	60.4245 (a) (1) and (2)	II.D.8	Notification, Reporting and Record Keeping requirements
	60.4245 (a) (3)	II.D.9	Notification, Reporting and Record Keeping requirements
	60.4245(b)	II.D.7	Notification, Reporting and Record Keeping requirements
	60.4245(e) (1) and (2)	II.D.10	Notification, Reporting and Record Keeping requirements
	60.4246	II.D.11	General Provisions
	60.4248	n/a	Definitions (no requirements)
NESHAP - 40 CFR Part 63, Subpart A	63.9	II.E.1	Notification
NESHAP - 40 CFR Part 63, Subpart ZZZZ	63.6645	II.F.1-2	Notifications

Asbestos NESHAP - 40 CFR Part 61, Subpart M	61.140 through 61.157	III.E	Requirements for demolition and renovation at facilities containing asbestos
Stratospheric Ozone Protection – 40 CFR Part 82	82.1 through 82.306	III.D	Requirements for treatment of class I and class II substances

US EPA promulgated a Federal Implementation Plan for preconstruction review of major sources in nonattainment areas and of minor sources and minor modifications at major sources in both attainment and nonattainment areas, which became effective on August 30, 2011. (*See* 76 FR 38748, July 1, 2011.) These regulations, codified in 40 CFR Parts 49 and 51, establish pre-construction review requirements for sources that will be incorporated in Part 71 federal operating permits. EPNG Leupp has replaced Unit AUX D-01, with an emergency generator AUX D-02. However, emissions from the modification were below TMNSR thresholds, it did not require a pre-construction permit. In the future, if the facility constructs new emission units or modifies existing emission units, it may be required to obtain a permit from US EPA prior to construction.

5. Monitoring

The first Part 71 Operating Permit for the facility was issued by US EPA on May 12, 2000 (NN-OP-99-05) and the first Administrative Amendment was issued on January 14, 2005. NNEPA issued Part 71 Operating Permit NN OP 04-004 for the facility on May 27, 2008. A permit renewal application was submitted on January 30, 2020.

All conditions from previous approvals are being incorporated into this Part 71 Permit Renewal. Additional monitoring requirements, which come from 40 CFR Part 63, Subpart ZZZZ, and 40 CFR Part 50, Subpart JJJJ are being included in the Title V permit. Monitoring requirements under 40 CFR Part 60, Subpart GG are being updated to reflect July 8, 2004 changes to the monitoring requirements for sulfur content in fuel.

In this renewal permit, consistent with 40 CFR § 71.6(a)(3)(i)(B), regular performance testing has been added for emissions of NO_x, CO, and VOC. The permittee is required to initiate the testing schedule with this permit term. The schedule will ensure regular testing of emission units going forward. This means, in the next permit renewal, the permit language in Condition II.A will need to be adjusted to reflect that a testing schedule will have been put into place and the permittee will be continuing with the required schedule going forward.

The monitoring and testing requirements in this permit are summarized in Table 7.

Table 7. Monitoring and testing in the Title V Permit

Requirement	Requirement Condition #	Monitoring in Part 71 Permit	Monitoring/Testing Condition #
NOx Limits (D-01)	II.C.4	NOx testing once every five (5) years within the permit term	II.C.9
Record operating hours (AUX D-02)	II.D.3	Install and maintain a non-resettable hour meter	II.D.7
Performance Test for NOx, CO and VOC (A-01 through A-11) and (B-01 through B-05)	II.A.1	Test for NOx, CO, and VOC simultaneously, at least once every fifteen (15) years At least five (5) engines shall be tested during this permit term	II.A.1
Performance Test for NOx, CO and VOC (C-03 and D-01)	II.A.2	Test for NOx, CO, and VOC, simultaneously, at least once every five (5) years for both engines Performance test for NOx, CO, and VOC, simultaneously, shall be tested during this permit term	II.A.2
Fuel sulfur content limit	II.C.1	FERC tariff with maximum total fuel sulfur content of natural gas	II.C.2 & II.C.3

6. Endangered Species Act

Under section 7(a)(2) of the ESA, federal agencies are required to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed, threatened, or endangered species, or destroy or adversely modify the designated critical habitat of such species. 16 U.S.C. § 1536(a)(2). The U.S. Fish and Wildlife Service and National Marine Fisheries Service have promulgated ESA implementing regulations at 50 CFR Part 402.

The CAA title V permit program requires the NNEPA to issue a permit specifically describing the permittee’s existing pollution control obligations under the CAA. A title V permit does not generally create any new substantive requirements, but rather simply incorporates all existing CAA requirements, called “applicable requirements,” into a

single unified operating permit applicable to a particular facility. The title V permit EPA is issuing to EPNG Leupp does not authorize the construction of new emission units, or emission increases from existing units, nor does it otherwise authorize any physical modifications to the facility or its operations. The NNEPA and US EPA have concluded that the permit appropriately incorporates all existing CAA requirements applicable to the facility. The NNEPA and US EPA lack discretion in this title V permitting decision to take action that could inure to the benefit of any listed species or their critical habitat. The NNEPA and US EPA have concluded that issuance of this permit will have no effect on any listed species or their critical habitat. Accordingly, this permit action is consistent with the requirements of ESA section 7.

7. Use of All Credible Evidence

Determinations of deviations from, continuous or intermittent compliance with, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit. Other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by EPNG Leupp, NNEPA and US EPA in such determinations.

8. NNEPA Authority

Authority to administer a Part 71 Permit Program was delegated to NNEPA by US EPA in part on October 13, 2004 and in whole on March 21, 2006. In delegating to NNEPA the authority to administer the Part 71 operating permit program, US EPA determined that NNEPA had adequate independent authority to administer the program, as required by 40 CFR § 71.10(a). Specifically, US EPA found NNEPA had adequate permit processing requirements and adequate permit enforcement-related investigatory authorities - Delegation Agreement between US EPA Region IX and NNEPA, §§ IV, V, VI.1, IX.2. Moreover, before waiving its collection of fees under 40 CFR § 71.9(c)(2)(ii), US EPA determined that NNEPA could collect sufficient revenue under its own authorities to fund a delegated Part 71 Program. Delegation Agreement at 1 and § II.2.

The Title V Permit therefore refers both to federal and to tribal provisions. When federal and tribal provisions are cited in parallel, the tribal provisions are identical to the federal provisions and compliance with the federal provision will constitute compliance with the tribal counterpart. Parallel tribal citations do not create any new requirements or impact the federal enforceability of the cited Part 71 requirements. All federal terms and conditions of the permit will be enforceable both by NNEPA and US EPA, as well as by citizens, under the federal Clean Air Act.

The provisions of Navajo law referenced in the permit will only be enforceable by NNEPA and will be enforced by NNEPA under the Navajo Nation Operating Permit Regulations and the Navajo Nation Air Pollution Prevention and Control Act, 4 N.N.C. §§ 1101-1162. Proposed Section IV.A (Fee Payment) refers only to the NNOPR as its source of authority

because US EPA waived its collection of fees, as discussed above. This provision will be tribally enforceable only.

9. Public Participation

a. Public Notice

As described in 40 C.F.R. § 71.11(a)(5) and NNOPR § 403(A), all draft operating permits shall be publicly noticed and made available for public comment. The public notice requirements for permit actions and the public comment period are described in 40 C.F.R. § 71.11(d) and NNOPR § 403.

Public notice of this proposed permit action will be provided to EPNG, US EPA Region IX, and the affected state, local and tribal governments via a mailed copy of the notice. A copy of the notice will also be provided to all persons who submitted a written request to be included on the mailing list.

Public notice will be published in a daily or weekly newspaper of general circulation in the area affected by this source.

b. Response to Comments

NNEPA will respond to all significant comments received on the draft Part 71 permit.

SO₂: AP-42 (7/00 version) emission factor for 2-stroke lean-burn engines + 20% safety factor

PM₁₀: AP-42 (7/00 version) emission factor for 2-stroke lean-burn engines + 20% safety factor (filterable + condensable PM)

SO₂: AP-42 (4/00 version) emission factor for turbines + 20% safety factor

PM₁₀: AP-42 (4/00 version) emission factor for turbines + 20% safety factor

Site Data	Unit ID						
	A01 thru A09	A10 and A11	B01 thru B05	C03	D01	AUX-A02	
hp	860	1,720	2,000	4,950	10,364	1,000	
MMBtu/hr	7.5	16.0	14.4	52.9	83.9	11.0	
Hours	8,760	8,760	8,760	8,760	8,760	8,760	

HAPs	A01	A02	A03	A04	A05	A06	A07	A08	A09	Sub-total
Chloroform	1.55E-03	1.55E-03	1.55E-03	1.55E-03	1.55E-03	1.55E-03	1.55E-03	1.55E-03	1.55E-03	1.39E-02
Chrysene	2.21E-05	2.21E-05	2.21E-05	2.21E-05	2.21E-05	2.21E-05	2.21E-05	2.21E-05	2.21E-05	1.99E-04
Ethylbenzene	3.55E-03	3.55E-03	3.55E-03	3.55E-03	3.55E-03	3.55E-03	3.55E-03	3.55E-03	3.55E-03	3.19E-02
Ethylene Dibromide	2.41E-03	2.41E-03	2.41E-03	2.41E-03	2.41E-03	2.41E-03	2.41E-03	2.41E-03	2.41E-03	2.17E-02
Fluoranthene	1.19E-05	1.19E-05	1.19E-05	1.19E-05	1.19E-05	1.19E-05	1.19E-05	1.19E-05	1.19E-05	1.07E-04
Fluorene	5.55E-05	5.55E-05	5.55E-05	5.55E-05	5.55E-05	5.55E-05	5.55E-05	5.55E-05	5.55E-05	5.00E-04
Formaldehyde	1.81E+00	1.81E+00	1.81E+00	1.81E+00	1.81E+00	1.81E+00	1.81E+00	1.81E+00	1.81E+00	1.63E+01
Indeno(1,2,3-c,d)pyrene	3.26E-07	3.26E-07	3.26E-07	3.26E-07	3.26E-07	3.26E-07	3.26E-07	3.26E-07	3.26E-07	2.94E-06
Methanol	8.15E-02	8.15E-02	8.15E-02	8.15E-02	8.15E-02	8.15E-02	8.15E-02	8.15E-02	8.15E-02	7.33E-01
Methylene Chloride	4.83E-03	4.83E-03	4.83E-03	4.83E-03	4.83E-03	4.83E-03	4.83E-03	4.83E-03	4.83E-03	4.35E-02
n-Hexane	1.46E-02	1.46E-02	1.46E-02	1.46E-02	1.46E-02	1.46E-02	1.46E-02	1.46E-02	1.46E-02	1.32E-01
Napthalene	3.16E-03	3.16E-03	3.16E-03	3.16E-03	3.16E-03	3.16E-03	3.16E-03	3.16E-03	3.16E-03	2.85E-02
PAH	4.40E-03	4.40E-03	4.40E-03	4.40E-03	4.40E-03	4.40E-03	4.40E-03	4.40E-03	4.40E-03	3.96E-02
Perylene	1.63E-07	1.63E-07	1.63E-07	1.63E-07	1.63E-07	1.63E-07	1.63E-07	1.63E-07	1.63E-07	1.47E-06
Phenanthrene	1.16E-04	1.16E-04	1.16E-04	1.16E-04	1.16E-04	1.16E-04	1.16E-04	1.16E-04	1.16E-04	1.04E-03
Phenol	1.38E-03	1.38E-03	1.38E-03	1.38E-03	1.38E-03	1.38E-03	1.38E-03	1.38E-03	1.38E-03	1.24E-02
Propylene Oxide										
Pyrene	1.92E-05	1.92E-05	1.92E-05	1.92E-05	1.92E-05	1.92E-05	1.92E-05	1.92E-05	1.92E-05	1.73E-04
Styrene	1.80E-03	1.80E-03	1.80E-03	1.80E-03	1.80E-03	1.80E-03	1.80E-03	1.80E-03	1.80E-03	1.62E-02
Toulene	3.16E-02	3.16E-02	3.16E-02	3.16E-02	3.16E-02	3.16E-02	3.16E-02	3.16E-02	3.16E-02	2.85E-01
Vinyl Chloride	8.11E-04	8.11E-04	8.11E-04	8.11E-04	8.11E-04	8.11E-04	8.11E-04	8.11E-04	8.11E-04	7.30E-03
Xylene	8.80E-03	8.80E-03	8.80E-03	8.80E-03	8.80E-03	8.80E-03	8.80E-03	8.80E-03	8.80E-03	7.92E-02
Total	1.08E+04	1.38E+04	1.92E+04	9.77E+03	3.81E+02	2.61E+00	2.61E+00	2.61E+00	2.61E+00	2.35E+01

Site Data	Unit ID						
	A01 thru A09	A10 and A11	B01 thru B05	C03	D01	AUX-A02	
hp	860	1,720	2,000	4,950	10,364	1,000	
MMBtu/hr	7.5	16.0	14.4	52.9	83.9	11.0	
Hours	8,760	8,760	8,760	8,760	8,760	8,760	

HAPs	A10	A11	Sub-total	B01	B02	B03	B04	B05	Sub-total
Ethylene Dibromide	5.14E-03	5.14E-03	1.03E-02	4.63E-03	4.63E-03	4.63E-03	4.63E-03	4.63E-03	2.31E-02
Fluoranthene	2.53E-05	2.53E-05	5.06E-05	2.28E-05	2.28E-05	2.28E-05	2.28E-05	2.28E-05	1.14E-04
Fluorene	1.18E-04	1.18E-04	2.37E-04	1.07E-04	1.07E-04	1.07E-04	1.07E-04	1.07E-04	5.33E-04
Formaldehyde	3.87E+00	3.87E+00	7.74E+00	3.48E+00	3.48E+00	3.48E+00	3.48E+00	3.48E+00	1.74E+01
Indeno(1,2,3-c,d)pyrene	6.96E-07	6.96E-07	1.39E-06	6.26E-07	6.26E-07	6.26E-07	6.26E-07	6.26E-07	3.13E-06
Methanol	1.74E-01	1.74E-01	3.48E-01	1.56E-01	1.56E-01	1.56E-01	1.56E-01	1.56E-01	7.82E-01
Methylene Chloride	1.03E-02	1.03E-02	2.06E-02	9.27E-03	9.27E-03	9.27E-03	9.27E-03	9.27E-03	4.64E-02
n-Hexane	3.12E-02	3.12E-02	6.24E-02	2.81E-02	2.81E-02	2.81E-02	2.81E-02	2.81E-02	1.40E-01
Napthalene	6.75E-03	6.75E-03	1.35E-02	6.07E-03	6.07E-03	6.07E-03	6.07E-03	6.07E-03	3.04E-02
PAH	9.39E-03	9.39E-03	1.88E-02	8.45E-03	8.45E-03	8.45E-03	8.45E-03	8.45E-03	4.23E-02
Perylene	3.48E-07	3.48E-07	6.97E-07	3.13E-07	3.13E-07	3.13E-07	3.13E-07	3.13E-07	1.57E-06
Phenanthrene	2.47E-04	2.47E-04	4.95E-04	2.23E-04	2.23E-04	2.23E-04	2.23E-04	2.23E-04	1.11E-03
Phenol	2.95E-03	2.95E-03	5.90E-03	2.66E-03	2.66E-03	2.66E-03	2.66E-03	2.66E-03	1.33E-02
Propylene Oxide									
Pyrene	4.09E-05	4.09E-05	8.19E-05	3.68E-05	3.68E-05	3.68E-05	3.68E-05	3.68E-05	1.84E-04
Styrene	3.84E-03	3.84E-03	7.68E-03	3.46E-03	3.46E-03	3.46E-03	3.46E-03	3.46E-03	1.73E-02
Toulene	6.75E-02	6.75E-02	1.35E-01	6.07E-02	6.07E-02	6.07E-02	6.07E-02	6.07E-02	3.04E-01
Vinyl Chloride	1.73E-03	1.73E-03	3.46E-03	1.56E-03	1.56E-03	1.56E-03	1.56E-03	1.56E-03	7.79E-03
Xylene	1.88E-02	1.88E-02	3.76E-02	1.69E-02	1.69E-02	1.69E-02	1.69E-02	1.69E-02	8.45E-02
Total	1.08E+04	1.38E+04	1.92E+04	9.78E+03	3.83E+02	5.02E+00	5.02E+00	5.02E+00	2.51E+01

Site Data	Unit ID						
	A01 thru A09	A10 and A11	B01 thru B05	C03	D01	AUX-A02	
hp	860	1,720	2,000	4,950	10,364	1,000	
MMBtu/hr	7.5	16.0	14.4	52.9	83.9	11.0	
Hours	8,760	8,760	8,760	8,760	8,760	8,760	

HAPs	C03	D01	AUX-A02		Facility Total
1,1,2,2- Tetrachloroethane					4.98E-02
1,1,2-Trichloroethane					3.96E-02
1,3-Butadiene	9.96E-05	1.58E-04	2.07E-05		6.16E-01
1,3-Dichloropropane					3.29E-02
2,2,4-Trimethylpentane					6.35E-01
2-Methylnaphthalene					1.61E-02
Acenaphthene					9.99E-04
Acenaphthylene					2.38E-03
Acetaldehyde	9.27E-03	1.47E-02	1.93E-03		5.86E+00
Acrolein	1.48E-03	2.35E-03	3.08E-04		5.85E+00
Anthracene					5.39E-04
Benz(a)anthracene					2.52E-04
Benzene	2.78E-03	4.41E-03	5.78E-04		1.47E+00
Benzo(a)pyrene					4.27E-06
Benzo(b)fluoranthene					6.39E-06
Benzo(e)pyrene					1.76E-05
Benzo(g,h,i)perylene					1.86E-05
Benzo(k)fluoranthene					3.20E-06
Biphenyl					2.97E-03
Carbon Tetrachloride					4.56E-02
Chlorobenzene					3.34E-02

Site Data	Unit ID						
	A01 thru A09	A10 and A11	B01 thru B05	C03	D01	AUX-A02	
hp	860	1,720	2,000	4,950	10,364	1,000	
MMBtu/hr	7.5	16.0	14.4	52.9	83.9	11.0	
Hours	8,760	8,760	8,760	8,760	8,760	8,760	

HAPs	C03	D01	AUX-A02		Facility Total
Chloroform					3.54E-02
Chrysene					5.05E-04
Ethylbenzene	7.41E-03	1.18E-02	1.54E-03		1.02E-01
Ethylene Dibromide					5.51E-02
Fluoranthene					2.71E-04
Fluorene					1.27E-03
Formaldehyde	1.65E-01	2.61E-01	3.42E-02		4.19E+01
Indeno(1,2,3-c,d)pyrene					7.46E-06
Methanol					1.86E+00
Methylene Chloride					1.10E-01
n-Hexane					3.34E-01
Napthalene	3.01E-04	4.78E-04	6.26E-05		7.32E-02
PAH	5.10E-04	8.08E-04	1.06E-04		1.02E-01
Perylene					3.73E-06
Phenanthrene					2.65E-03
Phenol					3.16E-02
Propylene Oxide	6.72E-03	1.07E-02	1.40E-03		1.88E-02
Pyrene					4.39E-04
Styrene					4.12E-02
Toulene	3.01E-02	4.78E-02	6.26E-03		8.08E-01
Vinyl Chloride					1.86E-02
Xylene	1.48E-02	2.35E-02	3.08E-03		2.43E-01
Total	1.08E+04	1.38E+04	1.92E+04		142157.6

Annual Emissions (tpy)= EF (AP-42) in lb/MMBtu*Heat Input (MMBtu/hr)*Total hours of operation in a year/2000 lb/ton

**El Paso Natural Gas
Leupp Compressor Station
Emission Factors Basis**

Units A01 thru A11 and B01 thru B05 are 2-stroke lean-burn reciprocating engines
Emission Factors from AP-42, Section 3.2, Table 3.2-1 (Version 7/00)

HAP	Emission Factor (lb/MMBtu)
1,1,2,2- Tetrachloroethane	6.63E-05
1,1,2-Trichloroethane	5.27E-05
1,3-Butadiene	8.20E-04
1,3-Dichloropropane	4.38E-05
2,2,4-Trimethylpentane	8.46E-04
2-Methylnaphthalene	2.14E-05
Acenaphthene	1.33E-06
Acenaphthylene	3.17E-06
Acetaldehyde	7.76E-03
Acrolein	7.78E-03
Anthracene	7.18E-07
Benz(a)anthracene	3.36E-07
Benzene	1.94E-03
Benzo(a)pyrene	5.68E-09
Benzo(b)fluoranthene	8.51E-09
Benzo(e)pyrene	2.34E-08
Benzo(g,h,i)perylene	2.48E-08
Benzo(k)fluoranthene	4.26E-09
Biphenyl	3.95E-06

HAP	Emission Factor (lb/MMBtu)
Carbon Tetrachloride	6.07E-05
Chlorobenzene	4.44E-05
Chloroform	4.71E-05
Chrysene	6.72E-07
Ethylbenzene	1.08E-04
Ethylene Dibromide	7.34E-05
Fluoranthene	3.61E-07
Fluorene	1.69E-06
Formaldehyde	5.52E-02
Indeno(1,2,3-c,d)pyrene	9.93E-09
Methanol	2.48E-03
Methylene Chloride	1.47E-04
n-Hexane	4.45E-04
Napthalene	9.63E-05
PAH	1.34E-04
Perylene	4.97E-09
Phenanthrene	3.53E-06
Phenol	4.21E-05
Pyrene	5.84E-07
Styrene	5.48E-05
Toulene	9.63E-04
Vinyl Chloride	2.47E-05
Xylene	2.68E-04

Units C03, D01, and AUX-A02 are natural gas turbines
Emission Factors from AP-42, Section 3.1, Table 3.2-3 (Version 4/00)

HAP	Emission Factor (lb/MMBtu)
1,3-Butadiene	4.30E-07
Acetaldehyde	4.00E-05
Acrolein	6.40E-06
Benzene	1.20E-05
Ethylbenzene	3.20E-05
Formaldehyde	7.10E-04
Napthalene	1.30E-06
PAH	2.20E-06
Propylene Oxide	2.90E-05
Toulene	1.30E-04
Xylenes	6.40E-05

Table 1. Criteria Pollutant Emissions

**Auxiliary Engine
El Paso Natural Gas, L. L. C.
Leupp Compressor Station**

Input data:

Generator rating 625 kW
 Engine rating 941 hp
 Operating hours 500 hours/yr
 Fuel rate 7,834 SCF/hr @ 100% load
 Fuel heating value 1,031 Btu/SCF
 Fuel consumption 8,583 Btu/hp-hr

	Emission Factor		Hourly Emissions	Annual Emissions	Tribal Minor NSR Threshold	PSD Modification Threshold
	<i>g/hp-hr</i>	<i>lb/MMBtu</i>	<i>lb/hr</i>	<i>tons/yr</i>	<i>tons/yr</i>	<i>tons/yr</i>
NOx	2		4.1	1.0	10	40
CO	4		8.3	2.1	10	100
VOC	1		2.1	0.52	5	40
SO2		5.88E-04	0.0047	0.0012	10	40
PM		9.99E-03	0.081	0.020	10	25
PM10		9.99E-03	0.081	0.020	5	15
PM2.5		9.99E-03	0.081	0.020	3	10

Conversions:

453.59 g/lb

Notes:

1. NOx, CO and VOC based on Engine NSPS limits for emergency spark-ignition engines
2. SO2 and PM based on AP-42, Chapter 3.2, Table 3.2-2 (4-Stroke Lean Burn Engines)

Table 2. Hazardous Air Pollutant (HAP) Emissions

Auxiliary Engine

El Paso Natural Gas

Leupp Compressor Station

Unit Details

Rating	941	hp
Annual Operating Hours	500	hours
Fuel Consumption	8,583	Btu/hp-hr
Heat Input (calculated)	8.1	MMBtu/hr

Pollutant	Emission Factor	Emission Rate	
		(lb/hr)	(tpy)
1,1,2,2-Tetrachloroethane	4.00E-05 lb/MMBtu	3.23E-04	8.08E-05
1,1,2-Trichloroethane	3.18E-05 lb/MMBtu	2.57E-04	6.42E-05
1,3-Butadiene	2.67E-04 lb/MMBtu	2.16E-03	5.39E-04
1,3-Dichloropropene	2.64E-05 lb/MMBtu	2.13E-04	5.33E-05
2-Methylnaphthalene	3.32E-05 lb/MMBtu	2.68E-04	6.70E-05
2,2,4-Trimethylpentane	2.50E-04 lb/MMBtu	2.02E-03	5.05E-04
Acenaphthene	1.25E-06 lb/MMBtu	1.01E-05	2.52E-06
Acenaphthylene	5.53E-06 lb/MMBtu	4.47E-05	1.12E-05
Acetaldehyde	8.36E-03 lb/MMBtu	6.75E-02	1.69E-02
Acrolein	5.14E-03 lb/MMBtu	4.15E-02	1.04E-02
Benzene	4.40E-04 lb/MMBtu	3.55E-03	8.88E-04
Benzo(b)fluoranthene	1.66E-07 lb/MMBtu	1.34E-06	3.35E-07
Benzo(e)pyrene	4.15E-07 lb/MMBtu	3.35E-06	8.38E-07
Benzo(g,h,i)perylene	4.14E-07 lb/MMBtu	3.34E-06	8.36E-07
Biphenyl	2.12E-04 lb/MMBtu	1.71E-03	4.28E-04
Carbon Tetrachloride	3.67E-05 lb/MMBtu	2.96E-04	7.41E-05
Chlorobenzene	3.04E-05 lb/MMBtu	2.46E-04	6.14E-05
Chloroform	2.85E-05 lb/MMBtu	2.30E-04	5.75E-05
Chrysene	6.93E-07 lb/MMBtu	5.60E-06	1.40E-06
Ethylbenzene	3.97E-05 lb/MMBtu	3.21E-04	8.02E-05
Ethylene Dibromide	4.43E-05 lb/MMBtu	3.58E-04	8.95E-05
Fluoranthene	1.11E-06 lb/MMBtu	8.97E-06	2.24E-06
Fluorene	5.67E-06 lb/MMBtu	4.58E-05	1.14E-05
Formaldehyde	5.28E-02 lb/MMBtu	4.26E-01	1.07E-01
Methanol	2.50E-03 lb/MMBtu	2.02E-02	5.05E-03
Methylene Chloride	2.00E-05 lb/MMBtu	1.62E-04	4.04E-05
n-Hexane	1.11E-03 lb/MMBtu	8.97E-03	2.24E-03
Naphthalene	7.44E-05 lb/MMBtu	6.01E-04	1.50E-04
PAH	2.69E-05 lb/MMBtu	2.17E-04	5.43E-05
Phenanthrene	1.04E-05 lb/MMBtu	8.40E-05	2.10E-05
Phenol	2.40E-05 lb/MMBtu	1.94E-04	4.85E-05
Pyrene	1.36E-06 lb/MMBtu	1.10E-05	2.75E-06
Styrene	2.36E-05 lb/MMBtu	1.91E-04	4.77E-05
Tetrachloroethane	2.48E-06 lb/MMBtu	2.00E-05	5.01E-06
Toluene	4.08E-04 lb/MMBtu	3.30E-03	8.24E-04
Vinyl Chloride	1.49E-05 lb/MMBtu	1.20E-04	3.01E-05
Xylene	1.84E-04 lb/MMBtu	1.49E-03	3.72E-04
Total		5.83E-01	1.46E-01

Notes:

1. Emission factors are from AP-42, Section 3.2 (7/00 version), Table 3.2-2, Uncontrolled Emission Factors For 4-Stroke Lean-Burn Engines.

Table 3. Greenhouse Gas (GHG) Emissions
Auxiliary Engine
El Paso Natural Gas
Leupp Compressor Station

Unit Details

Rating	941	hp
Annual Operating Hours	500	hours
Fuel Consumption	8,583	Btu/hp-hr
Heat Input (calculated)	8.1	MMBtu/hr
Annual fuel use	4,038	MMBtu/yr

GHG EMISSIONS

	CO ₂		CH ₄		N ₂ O		Total GHG Mass Emissions (tons/yr)	CO ₂ e ¹ (tons/yr)
	(kg/MMBtu)	(tons/yr)	(kg/MMBtu)	(tons/yr)	(kg/MMBtu)	(tons/yr)		
New Unit	53.06	236	1.0E-03	4.5E-03	1.0E-04	4.5E-04	236	236

Notes:

1. CO₂e based on multiplying CO₂ MT/yr and CH₄ MT/yr and N₂O MT/yr by their respective Global Warming Potentials.

GLOBAL WARMING POTENTIALS

Name	Chemical Formula	GWP
Carbon Dioxide	CO ₂	1
Methane	CH ₄	25
Nitrous Oxide	N ₂ O	298

Source: Table A-1 in 40 CFR Part 98 - EPA Mandatory Reporting of Greenhouse Gases

Conversions:

907.185 kg/ton



Public Notice

**PROPOSED RENEWAL OF PART 71 PERMIT
EL PASO NATURAL GAS COMPANY
LEUPP COMPRESSOR STATION
LOCATED NEAR LEUPP, ARIZONA**



The Navajo Nation Environmental Protection Agency (NNEPA), Navajo Air Quality Control Program (NAQCP), Operating Permit Program (OPP) is accepting written comments on the renewal of Part 71 permit for El Paso Natural Gas Company (EPNG) Leupp Compressor Station. The station performs natural gas inlet filtration and natural gas compression and transmission.

The Leupp Compressor Station is located 8 miles West of Leupp Trading Post in Coconino County on the Navajo Nation. The facility was initially constructed in 1950 and consists of 16 natural gas-fired two-stroke lean-burn engines, 4 natural gas-fired turbine compressors (one used for auxiliary power and another use as an emergency generator) and various storage tanks. The Leupp compressor station installed a new certified emergency generator as a replacement for the auxiliary power generator. This modification did not trigger preconstruction permitting under the Tribal Minor New Source Review or the Prevention of Significant Deterioration permitting programs nor would it increase any of their criteria pollutant's emissions. However, the new generator is subject to provision for new emergency engines in 40 CFR Part 60, Subpart JJJJ and 40 CFR Part 63, Subpart ZZZZ. This notice of draft Part 71 renewal permit fulfills the public notice procedure to which the draft permit is subject to.

Written comments, written requests for a public hearing, written requests for notification of the final decision regarding these permit actions, or inquiries or requests for additional information regarding these permit actions should be submitted to Natasha Yazzie at nyazzie1@navajo-nsn.gov, or by mail to NAQCP/OPP P.O. Box 529, Fort Defiance, AZ 86504. **Written comments and/or written requests must be received by 5:00 pm (MST), April 4, 2022.** Written comments will be considered prior to final permit decisions.

If NNEPA finds a significant degree of public interest, a public hearing will be held. NNEPA will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision. A public workshop will be held at Leupp Chapter House on March 10, 2022 (10am to 2pm).

The applications, proposed air permits, and statements of basis are available for review at NNEPA, NAQCP/OPP Route 112, Bldg. # 2837 Fort Defiance, AZ 86504. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). Copies of the draft permit and the statement of basis can also be obtained from NNEPA/OPP website at:

<https://navajoepa.org/operating-permit-program>

Inquiries or requests for additional information regarding these permit actions should be directed to Natasha Yazzie at the above address or by phone at (928) 729-4248.

Persons wishing to be included on the NAQCP permit public notice mailing list should contact Angie Frank in writing at NAQCP/OPP at the above address, by phone at (928) 729-4096, or by email at angiefrank@navajo-nsn.gov. E-files of permit public notices and permits can be requested from NNEPA (NAQCP) by email request at nyazzie1@navajo-nsn.gov.

THE NAVAJO NATION



JONATHAN NEZ | **PRESIDENT**

MYRON LIZER | **VICE PRESIDENT**

Navajo Nation Environmental Protection Agency –Air Quality Control/Operating Permit Program

Post Office Box 529, Fort Defiance, AZ 86504 • Bldg. #2837 Route 112

Telephone (928) 729-4096, Fax (928) 729-4313, Email airquality@navajo-nsn.gov

www.navajoepa.org

Detailed Information

Permitting Authority: NNEPA

County: Coconino

State: Arizona

AFS Plant ID: 04-005-N0565

Facility: El Paso Natural Gas Company, LLC – Leupp Compressor Station

Document Type: PERMIT RENEWAL – RESPONSE TO COMMENTS

NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY

Response to Comments on Draft Part 71 Permit Renewal to Operate
El Paso Natural Gas Company, LLC – Leupp Compressor Station
Permit # NN OP 22-005
April 13, 2022

Beginning on February 16, 2022, the Navajo Nation Environmental Protection Agency (NNEPA) had published El Paso Natural Gas (EPNG) – Leupp Compressor Station’s public notice in The Holbrook Tribune, Holbrook, AZ; the Arizona Daily Sun, Flagstaff, AZ on February 18, 2022; the Navajo-Hopi Observer, Flagstaff, AZ on February 23, 2022 and the Gallup Independent, Gallup, NM on February 28, 2022. The public notice stated that EPNG Leupp Compressor Station – located 8 miles west of Leupp Trading Post in Leupp, AZ on the Navajo Nation – had applied for a Part 71 permit renewal. The compressor station performs natural gas inlet separation and compression and consists of 16 natural gas-fired two-stroke lean-burn engines, 4 natural gas-fired turbine compressors (one used for auxiliary power and another use as an emergency generator) and various storage tanks.

The public notice also stated the EPNG Leupp Compressor Station had installed a new certified emergency generator as a replacement for the auxiliary power generator. This modification did not trigger preconstruction permitting under the Tribal Minor New Source Review or the Prevention of Significant Deterioration permitting programs nor would it increase any of their criteria pollutant’s emissions. Relevant new requirements applicable to the new generator (AUX D-02) were included. Unit AUX D-01 is subject to provision for new emergency engines in 40 CFR Part 60, Subpart JJJJ and 40 CFR Part 63, Subpart ZZZZ, notification requirements.

The public notice further provided information on how the public could review the draft permit renewal and other relevant documentation. Finally, the public notice informed interested parties that they would have 45 days to comment on whether the permit should be issued as proposed. The initial public comment period ended on April 4, 2022.

On March 10, 2022, NNEPA conducted a public workshop on the draft permit renewal and the

submission of public comments at the Leupp Chapter House in Leupp, AZ. During the public workshop Leupp community members were given an opportunity to submit a public comment. No public hearing was not requested from the community.

This Response to Comments document provides responses to 1 (one) comment mailed to NNEPA.

Written comment mailed to NNEPA, received on March 23, 2022

Mailed Written Comment 1: Kemp Horton

Organization/Company: Arizona Department of Corrections, Tucson, AZ

To Natasha Yazzie

Concerning – Renewal of Part 71 Permit El Paso Nat. Gas Leupp Compressor Station

Comment Summary:

2 strokes engines and gas turbines are vastly polluting – this stuff should be run with electric motors and solar power it is a disgrace this company is allowed to continue to pollute the area. Enclosed is how to remove all the pollution this place puts out with biological units – you just pipe the exhaust into water and let bacteria and biological unit eat the exhaust. Thank you for your time – please get this done the infrastructure bill should pay for this I assume.

Response to Comment 1:

NNEPA appreciates the comment provided; however, it is outside the scope of this Part 71 Permit Renewal action. The commenter is concerned about the pollution impacts of this source and suggests options for reducing those impacts. However, the commenter has not identified an applicable requirement under the Clean Air Act that would require the facility to further reduce its emissions. NNEPA can only incorporate applicable requirements under the Clean Air Act into the Part 71 Renewal Permit.