Navajo Nation Environmental Protection Agency
Navajo Nation Operating Permit Program

El Paso Natural Gas Company (EPNG)
White Rock Compressor Station

Permit No: NN OP 23-008

2023

DR. BUU NYGREN PRESIDENT
RICHELLE MONTOYA VICE PRESIDENT

The Navajo Nation | Yideeskąądi Nitsáhákees

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
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TITLE V PERMIT TO OPERATE

PERMIT #:	FACILITY NAME:	LOCATION:	COUNTY:	STATE:
NN OP 23-008	WHITE ROCK COMPRESSOR STATION	NEWCOMB	MCKINLEY	NM

ISSUE DATE:	EXPIRATION DATE:	AFS PLANT ID:	PERMITTING AUTHORITY:
10/05/2023	10/05/2028	35-045-NAV97	NNEPA

ACTION/STATUS: PART 71 OPERATING PERMIT

Don Perkins, Division Director
Kinder Morgan Inc.
2527 Foresight Circle
Grand Junction, CO 81505

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

Mr. Perkins,

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 – White Rock 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.

Stephen B. Etsitty, Executive Director
Navajo Nation Environmental Protection Agency

DR. BUU NYGREN PRESIDENT
RICHELLE MONTOYA VICE PRESIDENT

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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 – Window Rock 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 – White Rock Compressor Station, located at NE ¼ of Section 15, Township 23-N, Range 14-W, 22 miles East of Newcomb, New Mexico 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 the United States Environmental Protection Agency ("USEPA") Region IX and NNEPA, and all other applicable rules and regulations. The Permittee, El Paso Natural Gas Company, LLC – White Rock 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 – White Rock Compressor Station's draft permit public noticed in the Navajo Times, Window Rock, AZ on May 4, 2023; the Gallup Independent, Gallup, NM on May 8, 2023; the Gallup Sun, Gallup, NM on May 12, 2023; the Farmington Daily Times, Farmington, NM on May 15, 2023 and the Navajo-Hopi Observer, Flagstaff, AZ on May 17, 2023. 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 began on May 4, 2023 and ended on June 7, 2023. On May 26, 2023, NNEPA conducted an informational session (public workshop) on the draft permit renewal and the submission of public comments at the White Rock Chapter House in White Rock, NM. No public hearing was requested from the community and no public comments were received. NNEPA has provided responses to four (4) comments received from USEPA. The response to comments is included in the final permit.

The final 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.

Stephen B. Etsitty, Executive Director
Navajo Nation Environmental Protection Agency

CC: Noelle Mushro, US EPA Region IX

Title V Operating Permit

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TITLE V PERMIT TO OPERATE

PERMIT #:	FACILITY NAME:	LOCATION	COUNTY:	STATE:
NN OP 23-008	EL PASO NATURAL GAS COMPANY-WHITE ROCK COMPRESSOR STATION	NEWCOMB	SAN JUAN	NM

ISSUE DATE:	EXPIRATION DATE:	AFS PLANT ID:	PERMITTING AUTHORITY:
10/05/2023	10/05/2028	35-045-NAV97	NNEPA

ACTION/STATUS: PART 71 OPERATING PERMIT

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Abbreviations and Acronyms

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
NESHAP	National Emission Standards for Hazardous Air Pollutants
NNEPA	Navajo Nation Environmental Protection Agency
NNOPR	Navajo Nation Operating Permit Regulations
NNR	Navajo Nation Regulations
NOx	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 Incorporated	
• 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:	White Rock Compressor Station	
• Plant Location:	NE ¼ of Section 15, Township 23-N, Range 14-W, 22 miles East of Newcomb, New Mexico	
• County:	San Juan, New Mexico	
• EPA Region:	IX	
• Reservation:	Navajo Nation	
• Company Contact:	Weiwen Daly	Phone: (303) 914-7616
• Responsible Official:	Donald Perkins	Phone: (970) 208-1268
• EPA Contact:	Noelle Mushro	Phone: (415) 947-3987
• Tribal Contact:	Natasha Yazzie Suresh Chaudhary	Phone: (928) 729-4248 Phone: (928) 729-4249
• SIC Code:	4922	
• AFS Plant ID	35-045-NAV97	
• Description of Process:	The facility is a natural gas compressor station that performs gas inlet filtration, compression and gas cooling for the purpose of natural gas transmission.	

- Significant Emission Units:

Unit ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
A-01	GE Frame 3 Gas Turbine	79.2 MMBtu/hr 10,040 hp	1966 and modified in 1991	N/A
A-02	GE Frame 3 Gas Turbine with Dry Low NOx Combustion	93.9 MMBtu/hr 13,830 hp	1991	N/A
AUX A-01	Natural gas-fired RICE*, for auxiliary power	2.6 MMBtu/hr 365 hp	2005	N/A
AUX A-02	Natural gas-fired RICE*, for auxiliary power	4.4 MMBtu/hr 400 hp	1991	N/A
AUX A-03 & AUX A-04	Two Capstone C30 microturbines	0.43 MMBtu/hr 40 hp each	2010	N/A

*RICE – Reciprocating Internal Combustion Engine

II. Requirements for Specific Units

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

1. For turbines A-01 and A-02, during this five-year permit term, the permittee shall conduct one performance test that includes VOC emission simultaneously in conjunction with the testing required by Conditions II.B.13 and 14. Thereafter, each turbine shall be tested at least once per permit term for VOC emission simultaneously with the testing required by Conditions II.B.13 and II.B.14.

II.B. PSD Permit Requirements [PSD Permit NM-1000-B]

1. Pursuant to PSD-NM-1000-B, issued on October 1, 1991, as last amended October 10, 2010, the Permittee shall not exceed the emissions listed in the table below. The hourly NOx and CO emission rates listed below are directly enforceable. Any proposed increase in emission rates may require an application for a modification of the facilities covered by permit no.PSD-NM-1000-B. [Permit PSD-NM-1000-B Special Condition VI.A]

Emissions Sources – Maximum Allowable Emission Rates

Emission Unit ID#	Unit Description	NOx (Emission Rates)		CO (Emission Rates)	
		(lbs/ hr)	(tons/ yr)	(lbs/ hr)	(tons/ yr)
A-01	One (1) natural gas-fired regenerative-cycle turbine	40.41	177	7.33	32.1
A-02	One (1) natural gas-fired regenerative-cycle turbine with dry low NOx combustion	15.16	66.4	10.68	46.8
AUX A-01	One (1) natural gas-fired RICE, for auxiliary power generation	1.61	7.05	3.02	13.22
AUX A-02	One (1) natural gas-fired RICE, for auxiliary power generation	8	0.4	1.4	0.07

2. The emission concentration of nitrogen oxides (NOx) in the stack gases from the gas turbine identified as emission point A-01 shall not exceed 166 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Condition VI.C.a]

3. The emission concentration of carbon monoxide (CO) in the stack gases from the gas turbine identified as emission point A-01 shall not exceed 50 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Condition VI.D.a]

4. The emission concentration of nitrogen oxides (NOx) in the stack gases from the gas turbine identified as emission point A-02 shall not exceed 42 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Condition VI.C.b]

5. The emission concentration of carbon monoxide (CO) in the stack gases from the gas turbine identified as emission point A-02 shall not exceed 61 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Condition VI.D.b]

6. Emissions from the gas turbines shall not exceed 10 percent opacity, as determined by EPA Reference Method 9. [Permit PSD-NM-1000-B Special Provision VI.E]

7. Fuel fired at this facility is limited to pipeline quality sweet natural gas containing a maximum of 0.25 grains of hydrogen sulfide and 5.0 grains total sulfur per 100 dry standard cubic feet. Use of any other fuel will require a modification to this permit. [Permit PSD- NM-1000-B Special Condition VI.G]

Work Practice and Operational Requirements

8. The upgraded gas turbine identified as emission unit A-01 shall comply with all applicable requirements of Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated for stationary gas turbines in Title 40 Code of Federal Regulations Part 60 (40 CFR 60), Subparts A and GG. If any provision of this permit is more stringent than the regulations so incorporated, then for the purpose of complying with this permit, the permit shall govern and be the standard by which compliance shall be demonstrated [Permit no. PSD-NM-1000-B Special Condition VI.B]

9. Operation of the emergency generator, identified as emission point AUX A-02, shall be limited only to times when the full-time generator, identified as emission point AUX A-01, is not operational. [Permit PSD-NM-1000-B Special Condition VI.H]

Monitoring and Testing Requirements

10. It shall be the responsibility of the holder of this permit to demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods and monitoring methods proposed as alternatives to methods indicated in the provisions of permit PSD-NM-1000-B. Alternative methods shall be applied for in writing and shall be reviewed and approved by the NNEPA or the US EPA Region IX Office prior to their use in fulfilling any requirements of permit PSD-NM-1000-B. [Permit no. PSD-NM-1000-B Permit Condition I]

11. If sampling of stacks or process vents is required, the permittee is responsible for providing sampling facilities and conducting the sampling operations at his own expense. [Permit no. PSD-NM-1000-B Permit Condition II]

12. The parameters necessary to comply with the concentration limits stated in Conditions II.A.2, II.A.3, II.A.4, and II.A.5 of this permit shall be determined during the stack sampling required in Condition II.A.13 of this permit, and shall be determined during the operation of each turbine at four points in accordance with Condition II.A.13.e of this permit. [Permit no. PSD-NM-1000-B Special Condition VI.F]

13. The holder of this permit shall perform stack sampling and other testing to establish the actual pattern and quantities of air contaminants being emitted into

the atmosphere from each turbine. [Permit no. PSD-NM-1000-B Special Condition VI.I]

a. Sampling must be conducted in accordance with US EPA Reference Method 20 for the concentration of NOx and oxygen, Method 10 for the concentration of CO, and Method 9 for opacity. Consistent with Condition II.A.10, US EPA Reference Method 7E is also approved for sampling the concentration of NOx and oxygen.

b. Sampling by means of one of the test methods specified in 40 CFR 60.335(b) shall be conducted to determine initial compliance with the fuel sulfur limit of II.A.7. Fuel sampling may be performed at a point along the pipeline other than the White Rock Compressor Station after El Paso Natural Gas demonstrate to the satisfaction of US EPA Region IX that fuel data collected at that point will be representative of conditions at the White Rock Compressor Station.

c. US EPA Region IX and NNEPA shall be contacted as soon as testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:

   i. Date for pretest meeting
   ii. Date sampling will occur
   iii. Name of firm conducting sampling
   iv. Type of sampling equipment to be used
   v. Method or procedure to be used in sampling

   The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data and to review the format procedures for submitting the test reports.

   A written proposed description of any deviation from sampling procedures specified in the permit provisions shall be made available to US EPA Region IX and NNEPA prior to the pretest meetings. The US EPA Region IX and NNEPA shall approve or disapprove of any deviation from specified sampling procedures prior to its use. Requests to waive testing for any pollutant specified in the permit provisions shall be submitted to the US EPA Region IX and NNEPA for approval. Requests for alternate/equivalent procedures for NSPS testing shall be submitted to US EPA Region IX and NNEPA for approval.

d. Air contaminants to be tested include, (but are not limited to) NOx, CO and opacity.

e. Sampling of the turbine shall be conducted at four points in the normal operating sample of the gas turbine, including the minimum point in the sample and peak load.

f. Sampling shall occur at such times specified in condition II.A.14 of this permit and at other such times as may be required by the US EPA Region IX and NNEPA.

g. Copies of the final sampling report shall be forwarded to NNEPA and the US EPA Region IX Office within 60 days after the sampling is completed. The report shall be sent to:

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

and

US EPA, Region 9
Director, Enforcement and Compliance Assurance Division
Attn: Air Section, ENF-2-1
75 Hawthorne Street
San Francisco, CA 94105-3901

All reports can also be submitted through US EPA CDX/CEDRI portal consistent with submission methods listed in Section IV.E.

14. The holder of this permit shall perform a compliance stack test annually for NOx, CO and Opacity on Units A-01 and A-02, except as provided below. The holder of this permit may request in writing to US EPA Region IX an approval to revise the source test requirements, to include one of the following: a compliance test to be conducted every two to three years; a test to be conducted every quarter with a portable monitor; or a customized method approved by US EPA Region IX.
Testing is not required for Units A-01 and A-02 in any calendar year in which the unit operates 2,190 hours or less. Regardless of this exemption, each unit shall be tested at least once every five years. [Permit no. PSD-NM-1000-B Special Condition VI.J.1]

15. After the required demonstrations of the initial compliance for this facility, the method required in conditions II.A.13.a and II.A.13.b of this permit shall be used to determine continuous compliance with the provisions of this permit. [Permit no. PSD-NM-1000-B Special Condition VI.J.2]

16. Within 180 days of issuance of this permit, the permittee shall conduct a performance test for NOx emissions from both generators AUX A-01 and AUX

A-02. This test shall be conducted at the maximum operating capacity of the equipment being tested, as the available electrical load conditions permit. If testing is performed at less than the maximum operating capacity of the equipment being tested, the operating load must be reported, along with the test results, as a fraction of maximum capacity. [40 CFR 71.6(a)(3)(i)]

Recordkeeping Requirements

17. Information and data concerning production, operating hours, sampling and monitoring data, if applicable, fuel type and fuel sulfur content, if applicable, and all other information required by 40 CFR 60 shall be maintained in a file at the plant site or other previously approved location and made available at the request of personnel from US EPA. The file shall be retained for at least five years following the date that the information is obtained. [Permit No. PSD-NM-1000-B, Permit Condition V, 40 CFR 71.6(a)(3)(ii), 40 CFR 60.7(f)]

18. In addition to other applicable recordkeeping requirements, the following information shall be maintained in a file by the holder of this permit for a period of two years on a rolling retention basis and shall be made available on request to representatives of the US EPA. [Permit No. PSD-NM-1000-B, Special Condition VI.K]:

    a. The results of all fuel sampling conducted pursuant to condition II.A.14 of this permit.

    b. The results of all stack tests conducted pursuant to condition II.A.13 of this permit.

    c. The results of all monitoring/testing conducted pursuant to condition II.A.15 of this permit.

    d. Record of the hours of operation of the emergency generator AUX A-02.

Reporting Requirements

19. The holder of this permit shall submit, to US EPA Region IX, reports as described in 40 CFR 60.7. Such reports are required for each emission unit subject to this permit.

    In addition to the applicable information specified in 60.7(c), semiannual reports are required and should contain the hours of operation of the facility and a report summary of the periods of noncompliance. For the purpose of this permit, periods of noncompliance will be periods of exceedance of the parameters specified in Condition II.A.12 and reported in units of pounds per hour and tons per year. [Permit no. PSD-NM-1000-B Special Provision VI.L]

II.C. NSPS General Provisions

The following requirements apply to gas turbines A-01 and A-02 in accordance with 40 CFR Part 60, Subpart A ("General Provisions"):

1. All requests, reports, applications, submittals, and other communications to the Executive Director (NNEPA) pursuant to 40 CFR Part 60 shall be submitted in duplicate to the US EPA Region IX office at the following address [40 CFR § 60.4(a)]:

   US EPA, Region 9
   Director, Enforcement and Compliance Assurance Division
   Attn: Air Section, ENF-2-1
   75 Hawthorne Street
   San Francisco, CA 94105-3901

   All documents can also be submitted through US EPA CDX/CEDRI portal consistent with submission methods listed in Section IV.E.

2. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of EPNG White Rock; 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 Condition II.C.1 of this permit shall be determined in accordance with performance tests established by 40 CFR § 60.8 or with Condition II.C.4 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 EPNG White Rock, 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 EPNG White Rock or any physical or operational change to EPNG White Rock 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). [40 CFR § 60.7(a)]

II.D. NSPS for Stationary Gas Turbines

The following requirements apply to turbines A-01 and A-02 in accordance with 40 CFR Part 60, Subpart GG ("Standards of Performance for Stationary Gas Turbines"):

1. The permittee shall not cause to be discharged into the atmosphere from gas turbine A-02, any gases which contain nitrogen oxide in excess of the following [40 CFR 60.332(a)(2)]:

   $STD = 0.015 \times (14.4 / Y)$

   where:

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

Y = manufacturer's rated heat rate at manufacturer's rated 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.

2. The permittee shall not burn in turbines A-01 and A-02 any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw). [40 CFR § 60.333(b)]

3. Gas turbine A-02 is exempt from the NOx standard in 40 CFR 60.332(a)(2) when being fired with an emergency fuel. For the purpose of this requirement, the term "emergency fuel" means a "fuel fired by a gas turbine only during circumstances, such as natural gas supply curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the gas turbine." [40 CFR 60.332(k), 40 CFR 60.331(r)]

4. The permittee has elected not to monitor the total sulfur content of the gaseous fuel combusted in gas turbines A-01 and A-02 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)]

5. 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 turbines A-01 and A-02 satisfies the definition of "natural gas" in 40 CFR § 60.331(u). [40 CFR § 60.334(h)(3)]

Monitoring and Testing Requirements

6. For performance tests conducted as required by 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-hold 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)]

7. The permittee shall determine compliance with the nitrogen oxides standards in Condition II.C.1 of this permit as follows [40 CFR 60.335(b)(1)]:

    a. The nitrogen oxides emission rate (NOx) shall be computed for each run using the following equation:

$$NOx = (NOx_o)(Pr/Po)^{0.5}\ e^{\,19(Ho - 0.00633)}\ (288\ deg.K/T_a)^{1.53}$$

where:

NOx = emission rate of NOx at 15 percent O2 and ISO standard ambient conditions, volume percent
NOx_o = observed NOx concentration, ppm by volume
Pr = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg
Po = observed combustor inlet absolute pressure at test, mm Hg
Ho = observed humidity of ambient air, g H_2O/g air
e = transcendental constant, 2.718
Ta = ambient temperature, deg.K

8. The 3-run performance test required by this permit must be performed within ±5 percent at 30, 35, 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 peak load, or at the highest achievable load point if 90-to-100 percent of peak load cannot by physically achieved in practice. [40 CFR 60.335(b)(2)].

II.E. NESHAP General Provisions

The following requirements apply to gas-fired auxiliary power generators AUX A-01 and AUX A-02 in accordance with 40 CFR Part 63, Subpart A ("General Provisions"):

1. Prohibited Activities and Circumvention [40 CFR § 63.4]

   a. The permittee shall not operate any affected source in violation of the requirements of 40 CFR Part 63. Affected sources subject to and in compliance with either an extension of compliance or an exemption from compliance are not in violation of the requirements of 40 CFR Part 63. An extension of compliance can be granted by the Administrator under this part.

   b. The permittee shall not fail to keep records, notify, report, or revise reports as required by 40 CFR Part 63.

   c. The permittee shall not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to:

      i. The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere; or

ii. The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.

2. The permittee shall follow the preconstruction review and notification requirements specified in 40 CFR § 63.5. [40 CFR § 63.5]

3. Monitoring shall be conducted as set forth in 40 CFR § 63.8 and the relevant standard, with the exception of requirements set forth in 40 CFR § 63.8(e), (f)(4), and (f)(6). [40 CFR § 63.8]

4. The permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 63 in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, on microfiche, or on other forms of electronic storage. [40 CFR § 63.10(b)(1)]

II.F. NESHAP for Stationary Reciprocating Internal Combustion Engines

The following requirements apply to gas-fired auxiliary power generator AUX A-01 and AUX A-02 in accordance with 40 CFR Part 63, Subpart ZZZZ ("National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"):

Work Practice and Operational Requirements

1. The permittee shall meet the following requirements for the auxiliary stationary SI RICE (AUX A-01 and AUX A-02). [40 CFR Part 63, Subpart ZZZZ, Table 2d, Item-7; 40 CFR § 63.6603(a)]:

   a. The permittee shall change the oil and filter every 1,440 hours of operation or annually, whichever comes first.

   b. The permittee shall inspect air spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

   c. The permittee shall inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.

2. The permittee must operate and maintain AUX A-01 and AUX A-02, including associated monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to

minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation 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, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR § 63.6605(b)]

3. The permittee must operate and maintain AUX A-01 and AUX A-02 according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must, to the extent practicable, provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. [40 CFR § 63.6625(e)]

4. The permittee must minimize the time AUX A-01 and AUX A-02 spends at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR § 63.6625(h)]

5. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d of 40 CFR Part 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to Subpart ZZZZ. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR § 63.6625(j)]

Monitoring, Installation, Operation, and Maintenance Requirements

6. The permittee must demonstrate continuous compliance with each emission limitation, operating limitation and other requirements at all times in Table 2d, Item-7 (as stated in II.F.1) that applies to the facility according to the following

methods specified in Table 6, Item-9(a)(i)-(ii) of Subpart ZZZZ. [40 CFR § 63.6605(a), 40 CFR § 63.6640(a)]

a. Operating and maintaining the stationary RICEs according to the manufacturer's emission-related operation and maintenance instructions; or

b. Developing and following a maintenance plan which must, to the extent practicable, provide for the maintenance and operation of the engines in a manner consistent with good air pollution control practice for minimizing emissions.

Reporting Requirements

7. The permittee must report each instance in which the permittee does not meet each applicable operating limitation in 40 CFR Part 63, Subpart ZZZZ, Table 2d, Item-7 as stated in II.F.1. These instances are deviations from the emission and operating limitations in Subpart ZZZZ. These deviations must be reported according to the requirements in 40 CFR § 63.6650. [40 CFR § 63.6640(b)]

8. The permittee must report each instance in which applicable requirements in Subpart A are not met. [40 CFR § 63.6640(e)]

9. The permittee must report all deviations as defined in 40 CFR Part 63, Subpart ZZZZ in the semi-annual monitoring report required by 40 CFR § 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 7 of Subpart ZZZZ along with, or as part of, the semi-annual monitoring report required by 40 CFR § 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the NNEPA. [40 CFR § 63.6650(f)]

Recordkeeping Requirements

10. The permittee must keep the following records [40 CFR § 63.6655(a)]:

a. A copy of each notification and report submitted by the permittee to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any initial notification or notification of compliance status, as required in 40 CFR § 63.10(b)(2)(xiv).

b. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or air pollution control and monitoring equipment.

c. Records of performance tests and performance evaluations, as required in 40 CFR § 63.10(b)(2)(viii).

d. Records of all required maintenance performed on the air pollution control and monitoring equipment.

e. Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR § 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

11. The permittee must keep records of the maintenance conducted on AUX A-01 and AUX A-02 in order to demonstrate that AUX A-01 and AUX A-02 were operated and maintained according to the maintenance plan. [40 CFR § 63.6655(e)]

12. Records must be in a form suitable and readily available for expeditious review according to 40 CFR § 63.10(b)(1). [40 CFR § 63.6660(a)]

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

1. For applicable requirements with which EPNG White Rock is in compliance, EPNG White Rock will continue to comply with such requirements.

2. For applicable requirements that will become effective during the permit term, EPNG White Rock 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) [40 CFR § 71.2] :

   a. Any standard or other requirement provided for in the applicable implementation plan approved or promulgated by US EPA through a 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 EPNG White Rock 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 any 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. [40 CFR § 71.2] [NNOPR § 102(54)]

2. The permittee is required to send written 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.

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 Condition II for the emission unit being tested.

   d. Other source-specific data identified in Condition 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 O_2, 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 §§ 40 CFR 60.7(f), 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 Condition 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.

3. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records.

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. 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, as defined in Condition II.D.3. that provides the same information described in Condition III.C.1.a.i through ix above shall satisfy the requirement under Condition 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 shall 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 Condition 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 Condition III.C.4, must be submitted within 10 working days of the occurrence. All deviations reported under this paragraph must also be identified in the 6-month report required under Condition 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), MCAV-like appliances and/or small appliances:

   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 - Air Quality Control Program.

   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 amount of emissions calculated using the actual rate of emissions in TPY of any fee pollutant emitted from a Part 71 source over the preceding calendar year and 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)]

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 certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by January 30 and covering the previous calendar year. 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) [40 CFR § 71.6(c)(5)]

2. The permittee shall submit to NNEPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by July 30 of each year and covering the previous six months. 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. This condition is enforceable by NNEPA only. [NNOPR § 302(I)].

3. 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.

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.

e. 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.

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 Region 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

For Permit Renewal and Modification Applications :

US EPA Region 9
Air and Radiation Division
Attn : Permit Section, AIR-3-1
75 Hawthorne Street
San Francisco, CA 94105-3901

For All Other Submissions :

US EPA Region 9
Director, Enforcement and Compliance Assurance Division
Attn : Air Section, ENF-2-1
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 Condition 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 Condition 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 or EPA shall not be initiated before notice of such intent is provided to the permittee by NNEPA or EPA at least 30 days in advance of the date that the permit is to be reopened, except that NNEPA or EPA 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. 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.O. 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.P. 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. For sources other than those identified in Condition IV.Q.1.a, five years elapse from the date of issuance; or

    b. 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 at least 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.

Statement of Basis

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/air-quality-control-program

Detailed Information
Permitting Authority: Navajo Nation Environmental Protection Agency

County: San Juan **State:** New Mexico **AFS Plant ID:** 35-045-NAV97

Facility: El Paso Natural Gas Company, LLC – White Rock Compressor Station
Document Type: STATEMENT OF BASIS

Part 71 Federal Operating Permit
Statement of Basis

El Paso Natural Gas Company, LLC (EPNG)
White Rock Compressor Station
Permit No. NN OP 23-008

1. Facility Information

a. Permittee

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

b. Facility Location

NE ¼ of Section 15, Township 23-N, Range 14-W
22 miles East of Newcomb, New Mexico in San Juan County, NM

c. Contact Information

Facility Contact: Weiwen Daly, Engineer – EHS
Phone: (303) 914-7616

Responsible Official: Donald Perkins, Division Director
Phone: (970) 208-1268

d. Description of Operations, Products:

The facility is a natural gas compressor station that performs gas inlet filtration, compression and gas cooling for the purpose of natural gas transmission.

e. Permitting and/or Construction History

This plant was initially constructed in 1966 and originally consisted of one GE Frame 3 regenerative cycle turbine (A-01) for natural gas compression. On October 1, 1991, EPNG was issued permit PSD-NM-1000 by EPA Region VI for the modification of emission unit A-01 and the installation of one GE Frame 3 gas turbine (emission unit A-02) and two reciprocating combustion engines for auxiliary power generation (AUX A-01 and AUX A-02). On July 29, 2005, US EPA issued an addendum to PSD Permit NM 1000-B for the replacement of the existing emergency generator AUX A-01 with a smaller unit. In 2010, two Capstone C30 microturbines were installed at the facility (AUX A-03 and AUX A-04). The installation of these microturbines is considered to be an insignificant activity as the emissions are below the insignificant emission levels defined in 40 CFR 71.5(c)(11). The facility has not made any modification since the renewal in 2018. On July 21, 2023, EPA finalized the removal of "Emergency" affirmative defense provisions from EPA's title V operating permit program regulations. In this permit renewal, the emergency provisions have been removed and three (3) existing storage tanks have been added as insignificant units, pursuant to 40 CFR Part 71.5(c)(11). With the exception of the Emergency affirmative defense provisions, all other applicable requirements have been retained from the previous permit and the addition of the storage tanks did not alter any applicable requirements.

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	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
A-01	GE Frame 3 Gas Turbine	79.2 MMBtu/hr 10,040 hp	1966 and modified in 1991	N/A
A-02	GE Frame 3 Gas Turbine with Dry Low NOx Combustion	93.9 MMBtu/hr 13,830 hp	1991	N/A
AUX A-01	Natural gas-fired RICE*, for auxiliary power	2.6 MMBtu/hr 365 hp	2005	N/A
AUX A-02	Natural gas-fired RICE*, for auxiliary power	4.4 MMBtu/hr 400 hp	1991	N/A
AUX A-03 & AUX A-04	Two Capstone C30 microturbines	0.43 MMBtu/hr 40 hp each	2010	N/A

*RICE – Reciprocating Internal Combustion Engine

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 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.

vi. Storage tank emissions. Table 2 contains a list of storage tanks present at the facility.

Table 2. List of Storage Tanks

Tank No.	Date of Installation	Capacity (gal)	Liquid Stored
T-01	1966	4,200	Coolant
T-02	1966	8,820	Lube Oil
T-03	1991	10,565	Used 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 White Rock 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 are presented in Tables 3 and 4 below.

During this permit renewal action, unit AUX A-01 PM and VOC emission factors were found imprecise in the previous permit. Therefore, PM and VOC emission factors were taken from US EPA AP-42 for this unit, since no performance test was conducted on this unit. This reduced unit AUX A-01 PM and VOC emission by 0.3 tpy and 7.5 tpy respectively. Greenhouse gas emission have also been updated to reflect the most recent global warming potentials, increasing the facility greenhouse gases PTE by 73 tpy.

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**	**NOx**	**VOC**	**CO**	**Total HAPs**
A-01	2.29	2.29	1.18	177	0.73	32.1	0.34
A-02	2.71	2.71	1.40	66.4	0.86	46.8	0.40
AUX A-01	0.12	0.12	0.01	7.05	1.34	13.2	2.47
AUX A-02**	-	-	-	-	-	-	-
AUX A-03 & AUX A-04	0.03	0.03	0.02	0.16	0.06	0.43	0.00
Storage tank Emissions	-	-	-	-	2.4E-03	-	-
Insignificant Emissions*	less than 5.00	less than 5.00	-	-	less than 5.00	-	negligible
PTE of the Entire Source	10.2	10.2	2.60	250.6	8.0	92.5	3.21
Title V Major Source Thresholds	100	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

*This is an estimate of emissions from blowdown activities and the fugitive VOC from equipment leaks
**Pursuant to PSD-NM-1000-B, unit AUX A-02 can only operate when unit AUX A-01 is not in operation. Since unit AUX A-01 has higher emission rates than unit AUX A-02, the total PTE for the entire source does not include the PTE for AUX A-02 (worst case scenario).
***$PM_{2.5}$ 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	40,621
A-02	48,160
AUX A-01	1,334
AUX A-02	26
AUX A-03 & AUX A-04	444
Total	**90,585**

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 400,000 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. 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 turbines A-01 and A-02 located at EPNG White Rock because they were both installed prior to February 18, 2005 and have not been modified or reconstructed.

In 2010, EPNG installed two natural gas microturbines (AUX A-03 and AUX A-04). Pursuant to 40 CFR § 60.4305(a), a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005, is subject to this subpart. Since the heat input of each individual microturbine is 0.43 MMBtu/hr, the turbines AUX A-03 and AUX A-04 are not subject to the requirements of 40 CFR Part 60, Subpart KKKK.

b. NSPS for SO_2 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 (H_2S) and carbon dioxide (CO_2) from a sour natural gas stream. Sulfur recovery units are defined as process devices that recover sulfur from the acid gas (consisting of H_2S and CO_2) removed from

sour natural gas by a sweetening unit. There are no sweetening units or sulfur recovery units located at EPNG White Rock; therefore, this subpart does not apply.

c. **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 White Rock 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.

d. **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 at EPNG White Rock; therefore, this subpart does not apply.

e. **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 at EPNG White Rock; therefore, this subpart does not apply.

f. **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 at EPNG White Rock; therefore, this subpart does not apply.

g. 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 unit AUX A-01 and AUX A-02 located at EPNG White Rock are natural gas-fired reciprocating internal combustion engines (RICE) that were constructed prior to July 11, 2005 and has not been modified or reconstructed after July 11, 2005; therefore, subpart IIII does not apply.

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

These regulations establish emission standards and compliance requirements to control emissions from spark ignition (SI) internal combustion engines (ICE) that commence construction, modification or reconstruction after June 12, 2006, where the SI ICE are manufactured on or 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. AUX A-01 and AUX A-02 located at EPNG White Rock were constructed before June 12, 2006 and have not been modified or reconstructed after June 12, 2006; therefore, subpart JJJJ does not apply.

i. 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 (SO_2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. No equipment at the EPNG White Rock was constructed, modified or reconstructed after August 23, 2011; therefore, subpart OOOO does not apply.

j. NSPS for Crude Oil and Natural Gas Facilities (40 CFR §§ 60.5360a – 60.5499a; 40 CFR Part 60, Subpart OOOOa)

These regulations establish emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG) from affected facilities that commence construction, modification or reconstruction after September 18, 2015. No equipment at the EPNG White Rock was constructed, modified or reconstructed after September 18, 2015; therefore, subpart OOOOa does not apply.

k. **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 White Rock is not an oil or natural gas production facility; therefore, subpart HH does not apply.

l. **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 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 units, which consist of glycol dehydration units under 40 CFR § 63.1270(b). The EPNG White Rock compressor station does not have any glycol dehydration units and is an area source of HAPs. Therefore, subpart HHH does not apply.

m. **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 commenced construction or reconstruction on or before January 14, 2003 do not have to meet the requirements of this subpart. EPNG White Rock is an area source of HAP emissions and turbines A-01 and A-

02 at the facility were constructed before January 14, 2003. Therefore, the turbines A-01 and A-02 located at the facility are not subject to subpart YYYY.

The two microturbines AUX A-03 and AUX A-04 were constructed in 2010, which is after the applicability date of January 14, 2003. However, each individual microturbine has a power output of less than 1.0 megawatt (MW) and is located in an area source of HAP emissions and is exempt from the requirements of subpart YYYY pursuant to 40 CFR § 63.6090(b)(3).

n. 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 White Rock does not contain any affected units, as specified in 40 CFR § 72.6(a). Therefore, the emission units at EPNG White Rock are not subject to requirements of the Acid Rain Program.

o. 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 where a unit is subject to an emission limitation or standard for the applicable regulated air pollutant, uses a control device to achieve compliance with such limitation or standard, and has potential pre-control device emissions of the applicable regulated air pollutant that equal or exceed the amount required for the source to be classified as a major source. No emission unit at EPGN White Rock uses an add-on control device as defined in 40 CFR § 64.1. Therefore, pursuant to 40 CFR § 64.2, the requirements of 40 CFR Part 64 are not applicable.

4. Applicable Requirements

The following requirements apply to the EPNG White Rock compressor station.

Table 5. Summary of Applicable Federal Requirements

Applicable Requirements	Emission Point/Unit
Federal Air Quality Requirement	A-01, A-02, AUX A-01, AUX A-02, AUX A-03, AUX A-04
PSD Permit PSD-NM-1000B	A-01, A-02, AUX A-01, AUX A-02
NSPS Subpart A (General Provisions)	A-01, A-02
NSPS Subpart GG (Gas Turbines)	A-01, A-02
NESHAP General Provisions (40 CFR Part 63, Subpart A)	AUX A-01, AUX A-02
NESHAP for RICE (40 CFR Part 63, Subpart ZZZZ)	AUX A-01, AUX A-02
Asbestos NESHAP (40 CFR 61, Subpart M)	Facility Wide
Protection of Stratospheric Ozone (40 CFR Part 82)	Facility Wide

a. Prevention of Significant Deterioration (PSD)

The EPNG White Rock 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 NOx under 40 CFR § 52.21(b)(1)(i)(b). Therefore, this source is an existing major stationary source and is subject to PSD requirements for any major modification that will result in a significant emission increase pursuant to 40 CFR 52.21(a)(2).

EPNG White Rock was constructed in 1966 and modified in 1991. The initial construction of this source in 1966 predated the PSD applicability date and was not subject to the PSD program. See 40 CFR 52.21(i)(1)(i). In 1991, El Paso Natural Gas installed one (1) GE Frame 3 gas turbine (unit A-02) and two (2) reciprocating combustion engines for auxiliary power (units AUX A-01 and AUX A-02). Unit A-01 was also modified to increase the maximum capacity. The modifications that occurred in 1991 were subject to Prevention of Significant Deterioration (PSD), and were permitted in PSD Permit NM-1000, issued by US EPA on October 1, 1991. This PSD permit included federally enforceable emission limitations for NOx and CO.

On July 29, 2005, US EPA issued a minor modification to the original PSD permit (PSD Permit NM-1000-B), for the replacement of the existing 672 hp full time generator (unit AUX A-01) with a smaller unit.
On February 11, 2008, the permittee sent a letter to US EPA Region IX requesting an amendment to Permit no. PSD-NM-1000-B to incorporate changes to NSPS Subpart GG. Subpart GG was revised on July 8, 2004. The Permittee requested that the Permit PSD-NM-1000-B be revised to be consistent with the revisions to Subpart GG. The changes to Subpart GG included changes to sulfur and nitrogen

monitoring requirements. 40 CFR 60.334(h)(3) was changed to allow the source to opt out of monitoring sulfur content, provided the permittee can demonstrate that their fuel meets the definition of natural gas in 40 CFR 60.331. The Permittee uses natural gas meeting the definition. El Paso Natural Gas can demonstrate compliance with the emission requirements of NSPS, Subpart GG without performing fuel sulfur monitoring. Therefore, the proposed amendment was to remove the existing monitoring requirements for sulfur content in Special Provision 12. US EPA amended Permit no. PSD-NM-1000-B.

On May 25, 2010, the permittee sent a letter to US EPA Region IX requesting several changes to Permit no. PSD-NM-1000-B, specifically requesting to revise the CO emission limits for the emergency backup engine, delete the quarterly NSPS reporting condition, and revise the performance the performance test frequency for the two gas turbines. US EPA issued an Administrative Amendment to Permit no. PSD-NM-1000-B addressing these issues.

The following conditions are included from the PSD permit:

1. Pursuant to PSD-NM-1000-B, issued on October 1, 1991, as last amended October 10, 2010, the Permittee shall not exceed the emissions listed in the table below. The hourly NOx and CO emission rates listed below are directly enforceable. Any proposed increase in emission rates may require an application for a modification of the facilities covered by permit no.PSD-NM-1000-B. [Permit PSD-NM-1000-B Special Provision VI.A]

Table 6. Emission Sources – Maximum Allowable Emission Rates

Emission Unit ID#	**Unit Description**	**NOx (Emission Rates)**		**CO (Emission Rates)**	
		(lbs/ hr)	**(tons/ yr)**	**(lbs/ hr)**	**(tons/ yr)**
A-01	One (1) natural gas-fired regenerative-cycle turbine	40.41	177	7.33	32.1
A-02	One (1) natural gas-fired regenerative-cycle turbine with dry low NOx combustion	15.16	66.4	10.68	46.8
AUX A-01	One (1) natural gas-fired RICE, for auxiliary power generation	1.61	7.05	3.02	13.22
AUX A-02	One (1) natural gas-fired RICE, for auxiliary power generation	8	0.4	1.4	0.07

2. The emission concentration of nitrogen oxides (NOx) in the stack gases from the gas turbine identified as emission point A-01 shall not exceed 166 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Provision VI.C.a]

3. The emission concentration of carbon monoxide (CO) in the stack gases from the gas turbine identified as emission point A-01 shall not exceed 50 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Provision VI.D.a]

4. The emission concentration of nitrogen oxides (NOx) in the stack gases from the gas turbine identified as emission point A-02 shall not exceed 42 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Provision VI.C.b]

5. The emission concentration of carbon monoxide (CO) in the stack gases from the gas turbine identified as emission point A-02 shall not exceed 61 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit PSD-NM-1000-B Special Provision VI.D.b]

6. Emissions from the gas turbines shall not exceed 10 percent opacity, as determined by EPA Reference Method 9. [Permit PSD- NM-1000-B Special Provision VI.E]

7. Fuel fired at this facility is limited to pipeline quality sweet natural gas containing a maximum of 0.25 grains of hydrogen sulfide and 5.0 grains total sulfur per 100 dry standard cubic feet. Use of any other fuel will require a modification to this permit. [Permit PSD- NM-1000-B Special Provision VI.G]

8. Operation of the emergency generator, identified as emission point AUX A-02, shall be limited only to times when the full-time generator, identified as emission point AUX A-01, is not operational. [Permit PSD-NM-1000-B Special Provision VI.H]

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

These regulations apply to stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired that were constructed or modified after October 3, 1977. There are four natural gas-fired turbines, A-01, A-02, AUX-03, and AUX-04, at EPNG White Rock. The installation of AUX A-03 and AUX A-04 in 2010 did

not trigger the requirements of this subpart because the heat input capacity of each individual turbine is 0.43 MMBtu/hr. Turbine A-01 was constructed before October 3, 1977. However, turbine A-01 was modified to increase the maximum capacity. The uprate in 1991 for turbine A-01 is considered a modification under 40 CFR 60 because it resulted in an increase in emissions of a regulated pollutant for which a standard existed. Turbine A-02 was constructed after the October 3, 1977 applicability date.

Therefore, both turbine A-01 and turbine A-02 are subject to the requirements of 40 CFR, Subpart GG and the general provisions of 40 CFR 60, Subpart A. However, pursuant to 40 CFR 60.332(l), both A-01 and A-02 are exempt from the NOx limitations of this standard because both the units are classified as a regenerative cycle turbine and have a heat input less than 100 MMBtu per hour. A condition has been added to the permit to require the units A-01 and A-02 operate as regenerative cycle turbines at all times. Since A-01 and A-02 are not subject to the NOx limitations of 60.332(a), there are no applicable continuous monitoring requirements for the NOx emissions from turbines A-01 and A-02.

Turbines A-01 and A-02 are subject to the sulfur requirements in 40 CFR 60, Subpart GG. Pursuant to 40 CFR 60.333(b), the total sulfur contained in the fuel combusted shall not exceed 0.8 percent by weight (8,000 ppmw).

The permittee has elected not to monitor the total sulfur content of the natural gas combusted in turbines A-01 and A-02 by using natural gas which meets the definition in 40 CFR 60.331(u), pursuant to 40 CFR 60.334(h)(3). The permittee has provided an excerpt from its current tariff from the Federal Energy Regulatory Commission (FERC) demonstrating that the fuel delivered to this plant satisfied the "natural gas" definition in 40 CFR 60.331(u). No further compliance monitoring requirements under this NSPS are applicable to turbines A-01 or A-02. The permittee has performed a compliance stack test for turbines A-01 or A-02 in 2004.

c. <u>NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR §§ 63.6580 – 63.6675; 40 CFR Part 63, Subpart ZZZZ)</u>

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 White Rock compressor station is an area source of HAP emissions and consists of two 4-stroke lean burn auxiliary engines (AUX A-01 and AUX A-02) with less than 500 hp each. Pursuant to 40 CFR § 63.6603(a), AUX A-01 and AUX A-02 must meet the requirements of Table 2d, Item-7.

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 7. Incorporation of Applicable Requirements into the Part 71 Permit

Requirement	Condition/ Section	Condition in Part 71 Permit	Description/Notes
PSD permit PSD-NM-1000-B General Provisions	I.	II.B.10	Equivalency of Methods
	II.	II.B.11	Sampling Requirements
	III.	n/a	Appeal
	IV.	n/a	Construction Progress
	V.	II.B.17	Recordkeeping Requirements
PSD permit PSD-NM-1000-B Special Provisions	VI.A	II.B.1	Emission Sources - Maximum Allowable Emission Rates
	VI.B	II.B.8	Units A-01 and A-02 subject to NSPS
	VI.C.a	II.B.2	Limit of NOx emission concentration for A-01
	VI.C.b	II.B.4	Limit of NOx emission concentration for A-02
	VI.D.a	II.B.3	Limit of CO emission concentration for A-01
	VI.D.b	II.B.5	Limit of CO emission concentration for A-02
	VI.E	II.B.6	Opacity Requirements
	VI.F	II.B.12	Necessary parameters to comply with II.A.2, II.A.3, II.A.4, and II.A5
	VI.G	II.B.7	Fuel SO_2 Requirements
	VI.H	II.B.9	Operational Limit for AUX A-02
	II.VI.I.1	II.B.13.a	Performance test methods for NOx, CO, and opacity
	II.VI.I.2	II.B.13.b	Initial compliance with SO_2 limits
	II.VI.I.3	II.B.13.c	45 days notification

	II.VI.I.4	II.B.13.d	Contaminants to be tested
	II.VI.I.5	II.B.13.e	Sampling loads
	II.VI.I.6	II.B.13.f	Sampling frequency
	II.VI.I.7	II.B.13.g	Sampling report
	II.VI.J.1	II.B.14	Annual Stack Test Requirement
	II.VI.J.2	II.B.15	Continuous Compliance provisions
	II.VI.K	II.B.18	Recordkeeping Requirement
	II.VI.L	II.B.19	Reporting Requirement
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.C.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.C.9	Notification of construction or reconstruction (one-time only)
	60.7(b)	II.C.2	Records of startup, shutdown, and malfunction
	60.7(c)	n/a	CEMS reporting
	60.7(d)	n/a	Report format for CEMS reporting
	60.7(e)	n/a	Reporting frequency (PSD permit requires semi-annual excess emissions reports)
	60.7(f)	II.C.17	Maintain monitoring records for 5 years (PSD permit requires 2 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	n/a	Initial performance tests (one time only)
	60.9	II.C.3	Availability of information
	60.10	n/a	State authority (no requirements)
	60.11(a)	II.C.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.C.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.C.6	Credible evidence
	60.12	II.C.7	Circumvention
	60.13	n/a	CEMS requirements
	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.C.8	General notification and reporting
NSPS - 40 CFR Part 60, Subpart GG	60.330	n/a	Applicability (no requirements)
	60.331	II.D.3	NOx standard exemption during use of emergency fuel for A-02
	60.332	II.D.1	Standard for nitrogen oxides
	60.333	II.D.2	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
	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.D.4 II.D.5	Monitoring of fuel sulfur content not required if the fuel meets definition of natural gas in 40 CFR § 60.331(u)
	60.335	II.D.6 – II.D.8	Test methods and procedures
NESHAP - 40 CFR Part 63, Subpart A	63.1	n/a	Applicability (no requirements)
	63.2	n/a	Definitions (no requirements)
	63.3	n/a	Units and abbreviations (no requirements)
	63.4	II.E.1	Prohibited activities and circumvention
	63.5	II.E.2	Preconstruction notification

	63.6	n/a	Compliance with standards (no requirements)
	63.7	n/a	Performance testing (no requirements)
	63.8	II.E.3	Monitoring
	63.9	n/a	Notification
	63.10	II.E.4	Recordkeeping and reporting
	63.11-63.16	n/a	No requirements
NESHAP - 40 CFR Part 63, Subpart ZZZZ	63.6580 through 63.6590	n/a	Applicability (no requirements)
	63.6595	II.F	Compliance date
	63.6600 through 63.6602	n/a	Emission limitations for stationary RICE located at major sources of HAP emissions (facility is an area source of HAP emissions)
	63.6603	II.F.1	Emission and operating limitations for existing stationary RICE located at an area source of HAP emissions (AUX A-01 and AUX A-02 are auxiliary generators subjected to requirements of Table 2d, Item-7 as stated in 40 CFR § 63.6603)
	63.6604	n/a	Diesel fuel requirements for CI RICE (Unit AUX A-01 and AUX A-02 are spark ignition RICEs which uses natural gas as a fuel)
	63.6605	II.F.6	General compliance requirements
	63.6610 through 63.6620	n/a	Performance testing
	63.6625(e), (h) and (j)	II.F.3 - II.F.5	Maintenance and operation of auxiliary generators AUX A-01 and AUX A-02
	63.6630 through 63.6635	n/a	Initial compliance with emission and operating limitations and demonstration of continuous compliance (AUX A-01 and AUX A-02 are not subject to emission or operating limitations or demonstrations of continuous compliance)
	63.6640	II.F.6 - II.F.8	Demonstration of compliance & reporting
	63.6645	n/a	Notifications (facility is not required to submit notification required in this section)
	63.6650	II.F.9	Reports
	63.6655 and 63.6660	II.F.10 - II.F.12	Recordkeeping

	63.6665	n/a	General provisions
	63.6670	n/a	Implementation and enforcement
	63.6675	n/a	Definitions (no requirements)
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

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 White Rock is not currently constructing new emission units or modifying existing emission units. 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 PSD Permit PSD-NM-1000 was first issued by US EPA for EPNG White Rock on October 1, 1991 and amended thrice on July 29, 2005, June 18, 2008 and October 25, 2010. The first Part 71 Operating Permit for the facility was issued by US EPA on December 26, 2000. NNEPA issued the Part 71 Operating Permit NN OP 05-008 for the facility on December 30, 2008. This permit is being renewed again in this action.

All conditions from previous approvals are being incorporated into this Part 71 Permit Renewal. One additional monitoring requirement, which comes from 40 CFR Part 63, Subpart ZZZZ, is being included in the Title V permit. The monitoring requirements in this permit are summarized below in Table 8.

Table 8. Monitoring in the Title V Permit

Requirement	Requirement Condition #	Monitoring in Part 71 Permit	Monitoring Condition #
Performance Test for VOC (A-01 and A-02)	II.A.1	Once per permit term, test each unit for VOC simultaneously with NO_X and CO	II.A.1
NOx, CO, and opacity Limits (A-01 and A-02)	II.B.2, II.B.3, II.B.4, II.B.5, & II.B.6	Stack testing annually	II.B.13 & II.B.14
Operating Hours Limit (AUX A-02)	II.B.9	Limit of Operating Hours	II.B.18
Fuel sulfur content limit	II.B.7	FERC tariff with maximum total fuel sulfur content of natural gas	II.D.5 & II.D.6

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 White Rock 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 White Rock, 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. <u>Public Notice</u>

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 was provided to EPNG, US EPA Region IX, and the affected state, local and tribal governments. A copy of the notice was also provided to all persons who submitted a written request to be included on the mailing list.

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

b. Response to Comments

NNEPA responded to all comments received on this draft Part 71 permit. A copy of the response to comment is attached within this permit.

Potential to Emit Calculations

Emission Calculations
From One (1) NG Fired Turbine A-01
EPNG - White Rock Compressor Station
NE 1/4 Section 15, Township 23-N, Range 14-W
22 miles east of Newcomb, New Mexico

Heat Input Capacity MMBtu/hr	Max. Power Output hp
79.2	10,040

1. Potential to Emit of Criteria Pollutants

	Pollutant					
	PM*	PM10*	SO_2*	NO_x**	VOC*	CO**
Emission Factor	6.60E-03 (lbs/MMBtu)	6.60E-03 (lbs/MMBtu)	3.40E-03 (lbs/MMBtu)	40.41 (lbs/hr)	2.10E-03 (lbs/MMBtu)	7.33 (lbs/hr)
PTE (tons/yr)	**2.29**	**2.29**	**1.18**	**177.0**	**0.73**	**32.1**

*The emission factors for PM, PM10, SO_2, and VOC are from AP-42, Chapter 3.1, Table 3.1-2a for Stationary Gas Turbines (04/00).

**The NOx, and CO emission factors are from permit PSD-NM-1000-B.

Methodology

PTE of PM, PM10, SO_2, and VOC (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs
PTE of NOx and CO (tons/yr) = Emission Factor (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**	**PTE of HAP (tons/yr)**
1,3-Butadiene	4.30E-07	1.49E-04
Acetaldehyde	4.00E-05	1.39E-02
Acrolein	6.40E-06	2.22E-03
Benzene	1.20E-05	4.16E-03
Ethylbenzene	3.20E-05	1.11E-02
Formaldehyde	7.10E-04	2.46E-01
Naphthalene	1.30E-06	4.51E-04
PAH	2.20E-06	7.63E-04
Propylene Oxide	2.90E-05	1.01E-02
Toluene	1.30E-04	4.51E-02
Xylene	6.40E-05	2.22E-02
Total HAPs		**0.33**

Note: Emission factors are from AP-42, Chapter 3.1, Table 3.1-3 for NG Fired Stationary Turbine (04/00).

Methodology

PTE of HAPs (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Calculations
From One (1) NG Fired Turbine A-02
EPNG - White Rock Compressor Station
NE 1/4 Section 15, Township 23-N, Range 14-W
22 miles east of Newcomb, New Mexico

Heat Input Capacity MMBtu/hr	Max. Power Output hp
93.9	13,830

1. Potential to Emit of Criteria Pollutants

	Pollutant					
	PM*	PM10*	SO_2*	NO_x**	VOC*	CO**
Emission Factor	6.60E-03 (lbs/MMBtu)	6.60E-03 (lbs/MMBtu)	3.40E-03 (lbs/MMBtu)	15.16 (lbs/hr)	2.10E-03 (lbs/MMBtu)	10.68 (lbs/hr)
PTE (tons/yr)	**2.71**	**2.71**	**1.40**	**66.4**	**0.86**	**46.8**

*The emission factors for PM, PM10, SO_2, and VOC are from AP-42, Chapter 3.1, Table 3.1-2a for Stationary Gas Turbines (04/00).

**The NOx, and CO emission factors are the emission limits in permit PSD-NM-1000-B

Methodology

PTE of PM, PM10, SO_2, and VOC (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs
PTE of NOx and CO (tons/yr) = Emission Factor (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**	**PTE of HAP (tons/yr)**
1,3-Butadiene	4.30E-07	1.77E-04
Acetaldehyde	4.00E-05	1.65E-02
Acrolein	6.40E-06	2.63E-03
Benzene	1.20E-05	4.94E-03
Ethylbenzene	3.20E-05	1.32E-02
Formaldehyde	7.10E-04	2.92E-01
Naphthalene	1.30E-06	5.35E-04
PAH	2.20E-06	9.05E-04
Propylene Oxide	2.90E-05	1.19E-02
Toluene	1.30E-04	5.35E-02
Xylene	6.40E-05	2.63E-02
Total HAPs		**0.40**

Note: Emission factors are from AP-42, Chapter 3.1, Table 3.1-3 for NG Fired Stationary Turbine (04/00).

Methodology

PTE of HAPs (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Calculations
From One (1) NG Fired Reciprocating Engine (AUX A-01)
EPNG - White Rock Compressor Station
NE 1/4 Section 15, Township 23-N, Range 14-W
22 miles east of Newcomb, New Mexico

Heat Input Capacity MMBtu/hr	Max. Power Output hp
2.60	365

1. Potential to Emit of Criteria Pollutants

	Pollutant					
	PM*	PM10*	SO_2*	NO_x**	VOC*	CO**
Emission Factor	1.01E-02 (lb/MMBtu)	1.01E-02 (lb/MMBtu)	5.88E-04 (lb/MMBtu)	1.61 (lbs/hr)	1.18E-01 (lb/MMBtu)	3.02 (lbs/hr)
PTE (tons/yr)	**0.12**	**0.12**	**0.00**	**7.05**	**1.34**	**13.2**

*The emission factor for PM, SO_2 and VOC are from AP-42, Chapter 3.2, Table 3.2-2 for 4-stroke lean burn engines (7/00) .
**The NOx, and CO emission factors are the emission limits in permit PSD-NM-1000-B

Methodology

PTE of SO_2 (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 1.25 x 8760 hrs/yr x 1 ton/2000 lbs
PTE of PM10, SO_2, NOx, and VOC, and CO(tons/yr) = Emission Factor (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**	**PTE of HAP (tons/yr)**
Acetaldehyde	8.36E-03	9.52E-02
Acrolein	5.14E-03	5.85E-02
Benzene	4.40E-04	5.01E-03
Ethane	1.05E-01	1.20
Formaldehyde	5.28E-02	0.60
Methanol	2.50E-03	2.85E-02
Propane	4.19E-02	4.77E-01
Hexane	1.11E-03	1.26E-02
Xylene	1.84E-04	2.10E-03
Total HAPs		**2.47**

Emission factors for HAPS are from AP-42, Chapter 3.2, Table 3.2-2 for 4-stroke lean burn engines.

Methodology

PTE of HAPs (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Calculations
From One (1) NG Fired Emergency Reciprocating Engine (AUX A-02)
EPNG - White Rock Compressor Station
NE 1/4 Section 15, Township 23-N, Range 14-W
22 miles east of Newcomb, New Mexico

Heat Input Capacity MMBtu/hr	Max. Power Output hp
4.40	400

1. Potential to Emit of Criteria Pollutants

	Pollutant					
	PM*	PM10*	SO_2**	NO_x**	VOC**	CO*
Emission Factor	1.01E-02 (lbs/MMBtu)	1.01E-02 (lbs/MMBtu)	5.88E-04 (lbs/MMBtu)	8.00 (lbs/hr)	1.18E-01 (lbs/MMBtu)	1.40 (lbs/hr)
PTE (tons/yr)	**2.22E-03**	**2.22E-03**	**1.29E-04**	**0.40**	**2.60E-02**	**0.07**

*The emission factors for PM, PM10, SO_2, and VOC are from AP-42, Chapter 3.2, Table 3.2-2 for 4-stroke lean burn engines (7/00).
PM10 includes fiterable PM10 and condensible PM.
**The NOx, and CO emission factors are the emission limits in permit PSD-NM-1000-B

Methodology

PTE of PM (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs
PTE of SO2, NOx, CO, and VOC(tons/yr) = Emission Factor (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**	**PTE of HAP (tons/yr)**
Acetaldehyde	8.36E-03	1.84E-03
Acrolein	5.14E-03	1.13E-03
Benzene	4.40E-04	9.68E-05
Ethane	1.05E-01	2.31E-02
Formaldehyde	5.28E-02	1.16E-02
Methanol	2.50E-03	5.50E-04
Propane	4.19E-02	9.22E-03
Hexane	1.11E-03	2.44E-04
Xylene	1.84E-04	4.05E-05
Total HAPs		**0.05**

Emission factors for HAPS are from AP-42, Chapter 3.2, Table 3.2-2 for 4-stroke lean burn engines.

Methodology

PTE of HAPs (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 100 hrs/yr x 1 ton/2000 lbs

Emission Calculations
From Two (2) Microturbines (AUX A-03 and AUX A-04)
EPNG - White Rock Compressor Station
NE 1/4 Section 15, Township 23-N, Range 14-W
22 miles east of Newcomb, New Mexico

Heat Input Capacity MMBtu/hr	Max. Power Output hp
0.43	40

1. Potential to Emit of Criteria Pollutants

	Pollutant					
	PM*	PM10*	SO_2*	NO_x**	VOC**	CO**
Emission Factor	6.60E-03 (lbs/MMBtu)	6.60E-03 (lbs/MMBtu)	3.40E-03 (lbs/MMBtu)	4.91E-04 (lbs/KWh)	1.71E-04 (lbs/KWh)	1.33E-03 (lbs/KWh)
AUX A-03	1.56E-02	1.56E-02	8.06E-03	8.02E-02	2.79E-02	2.17E-01
AUX A-04	1.56E-02	1.56E-02	8.06E-03	8.02E-02	2.79E-02	2.17E-01
Total	**0.03**	**0.03**	**0.02**	**0.16**	**0.06**	**0.43**

*The emission factors for PM, PM10, and SO_2 are from AP-42 emission factor (4/00).

**The NOx, VOC and CO emission factors are the Manufacturer emission factors

1 hp = 0.746 KW

Methodology

PTE of PM and SO2 (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs+ 25% safety factor
PTE of NOx, CO, and VOC(tons/yr) =Max Output (hp) x Emission Factor (lbs/KWh) x 0.746 Kw/1hp *8760 hrs/yr x 1 ton/2000 lbs + 25% safety factor

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**	**PTE of HAP (tons/yr)**
Acetaldehyde	7.59E-05	1.64E-06
Acrolein	1.21E-05	2.62E-07
Benzene	2.28E-05	4.94E-07
Ethane	6.07E-05	1.31E-06
Formaldehyde	1.35E-05	2.92E-07
Methanol	2.50E-03	5.41E-05
Propane	4.19E-02	9.07E-04
Hexane	1.11E-03	2.40E-05
Xylene	1.84E-04	3.98E-06
Total HAPs		**0.001**

Methodology
PTE of HAPs (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Calculations
From Storage Tanks
EPNG - White Rock Compressor Station
NE 1/4 Section 15, Township 23-N, Range 14-W
22 miles east of Newcomb, New Mexico

Tank Parameters [1]

Variable	Description	Units	Value
-	Roof Construction	-	Dome
DPb	Breather vent pressure range	psi	0.06
I	Solar insolation factor	Btu/ft^2-day	1669
P_A	Atmospheric Pressure	psia	11.63
T	Annual Average Temperature	°F	48.8
T_{AX}	Daily Maximum Ambient Temperature	°R	525.6
T_{AN}	Daily Minimum Ambient Temperature	°R	492
DT_A	Daily average ambient temperature range	°R	33.6
K_D	Working Loss Product factor		1

[1] Tank parameters were obtained from AP-42, Section 7.1. Data corresponds to the nearest major city Gallup, New Mexico.

Tank and Material Specifications

Tank No.	Material	VFR/HFR	D	H/L	H_R	CAPACITY	COLOR	α	Mv	P_{VA}	Q	T_{LA}	T_V
		Tank Type	Tank Dia.	Tank Height/ Length	Tank Roof Height	Tank Capacity	Tank Color	Paint Solar Absorbance Factor	Vapor Molecular Weight	Average True Vapor Pressure	Annual Throughput	Daily Average Liquid Surface Temp.	Average Vapor Temperature
			(ft)	(ft)	(ft)	(bbl)			(lb/lbmol)	(psia)	(bbl/yr)	(°R)	(°R)
T-01	Propylene Glycol	VFR	7.8	12	0.2	100	White/Average	0.25	76	0.000597	100	511.6	512.9
T-02	Lube Oil	VFR	10	15	0.2	210	White/Average	0.25	130	0.0050	210	511.6	512.9
T-03	Used Oil	VFR	8	28	0.2	252	Gray Medium/ Average	0.71	130	0.0059	252	516.9	520.5

Lube oil and Used oil are assumed to be close to No. 2 Fuel Oil (Diesel), Physical Properties were taken from AP-42, Table 7.1-2
For Propylene Glycol, Physical Properties are taken from Ap-42, Table 7.1-3
Paint Solar Absorbance Factors are taken from AP-42, Table 7.1-6

Tank Emission Calculations

Tank No.	Material	H_{RO}	H_{vo}	V_v	W_V	DT_V	K_E	K_S	L_S	K_N	K_B	L_W	L_T
		Tank Roof Outage	Vapor Space Outage	Vapor Space Volume	Vapor Density	Daily Vapor Temperature Range	Vapor Space Expansion Factor	Vented Vapor Saturation Factor	Standing Loss per Tank [2]	Working Loss Turnover Factor	Vent Setting Correction Factor	Working Loss [3]	Total Annual VOC Emissions
		(ft)	(ft)	(ft^3)	(lb/ft^3)	(°R)			(lb/yr)			(lb/yr)	(ton/yr)
T-01	Propylene Glycol	0.1	6.1	291.5	0.000008	31.9	0.06	1.00	0.0504	1.0	1.0	0.00	2.7E-05
T-02	Lube Oil	0.1	7.6	596.9	0.000117	31.9	0.06	1.00	1.4588	1.0	1.0	0.14	8.0E-04
T-03	Used Oil	0.1	14.1	708.7	0.000137	47.2	0.08	1.00	3.0084	1.0	1.0	0.19	1.6E-03
											Total Insignificant Tank Emissions:		**0.002427**

[2] Standing loss (lb/yr) = 365 (days/year) * Vapor Space volume (ft3)* Vapor Density (lb/ft3)* Vapor Expansion Factor * Vented Vapor Saturation Factor
[3] Working loss (lb/yr) = net working loss throughput (ft3/yr)* working loss turnover factor* working loss product factor* vapor density (lb/ft3) * vent setting correction factor

AP-42, Table 7.1-6

Surface Color	Shade or Type	Reflective Condition		
		New	Average	Aged
White		0.17	0.25	0.34
Aluminum	Specular	0.39	0.44	0.49
Alluminum	Diffuse	0.60	0.64	0.68
Beige/Cream		0.35	0.42	0.49
Black		0.97	0.97	0.97
Brown		0.58	0.62	0.67
Gray	Light	0.54	0.58	0.63
Gray	Medium	0.68	0.71	0.74
Green	Dark	0.89	0.90	0.91
Red	Primer	0.89	0.90	0.91
Rust	Red Iron Oxide	0.38	0.34	0.50
Tan		0.43	0.49	0.55
Aluminium	mill finish, unpainted	0.10	0.12	0.15

$V_V=(\pi D^2)/4*H_{VO}$

$H_{VO}=H_S-H_L+H_{RO}$

$H_{RO}=H_R[1/2+1/6(H_R/R_S)^2]$

$W_V=M_V*P_{VA}/(R*T_V)$
$T_{LA}=0.4T_{AA}+0.6T_B+0.005*\alpha*I$
$T_V=0.7*T_{AA}+0.3*T_B+0.009*\alpha*I$
$P_{VA}=10^{(A-(B/(T_{LA}+C)))}$ mm Hg for Propylene Glycol
$P_{VA}=EXP(A-(B/(T_{LA}))$ psia for Lube Oil and Used Oil
$K_E=0.0018*(0.7(T_{AX}-T_{AN})+0.02*\alpha*I$
$K_S=1/(1+0.053P_{VA}*H_{VO})$

Emission Calculations
Potential to Emit Greenhouse Gases
EPNG - White Rock Compressor Station
NE 1/4 Section 15, Township 23-N, Range 14-W
22 miles east of Newcomb, New Mexico

Emission Unit ID	Site Rating		Hours of Operation	Emission Factors (kg/MMBtu)			Global Warming Potentials	
	Hp	MMBtu/hr		CO_2	CH_4	N_2O	CH_4	N_2O
A-01	10,040	79.2	8,760	53.06	1.00E-03	1.00E-04	25	298
A-02	13,830	93.9	8,760	53.06	1.00E-03	1.00E-04	25	298
AUX A-01	365	2.6	8,760	53.06	1.00E-03	1.00E-04	25	298
AUX A-02	400	4.4	100	53.06	1.00E-03	1.00E-04	25	298
AUX A-03	40	0.4	8,760	53.06	1.00E-03	1.00E-04	25	298
AUX A-04	40	0.4	8,760	53.06	1.00E-03	1.00E-04	25	298

Emission Unit ID	Emission Rate (lb/hr)				Emissions (tpy)			
	CO2	CH4	N2O	CO2e	CO2	CH4	N2O	CO2e
A-01	9,265	0.17	0.017	9,274	40,579	0.8	0.1	40,621
A-02	10,984	0.21	0.021	10,995	48,111	0.9	0.1	48,160
AUX A-01	304	0.01	0.001	304	1,332	0.0	0.0	1,334
AUX A-02	515	0.01	0.001	515	26	0.0	0.0	26
AUX A-03	51	0.00	0.000	51	222	0.0	0.0	222
AUX A-04	51	0.00	0.000	51	222	0.0	0.0	222
Total					**90,491**	**2**	**0**	**90,585**

1 kg = 2.20462 lb

Emission factors for natural gas were obtained from Tables C-1 and C-2 of 40 CFR 98, Subpart C
Global Warming Potentials were obtained fromTable A-1 of the EPA MRR under 40 CFR Part 98

Emission Rate (lb/hr) = Heat Input (MMBtu/hr)*Emission Factor (kg/MMBtu)*(2.20462 lbs/1 kg)
Total Emissions (tpy) = Emission Rate (lbs/hr)* Operating Hours (hrs/year)* (1 ton/2000 lbs)

Emission Calculations
Potential to Emit Summary
EPNG - White Rock Compressor Station
NE 1/4 Section 15, Township 23-N, Range 14-W
22 miles east of Newcomb, New Mexico

Emission Units	PM (tons/yr)	PM10 (tons/yr)	SO_2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
A-01	2.29	2.29	1.18	177	0.73	32.1	0.33
A-02	2.71	2.71	1.40	66.4	0.86	46.8	0.40
AUX A-01	0.12	0.12	0.00	7.05	1.34	13.2	2.47
AUX A-02**	-	-	-	-	-	-	-
AUX A-03 & AUX A-04	0.03	0.03	0.02	0.16	0.06	0.43	0.001
Tank Emissions	-	-	-	-	2.4E-03	-	-
Insignificant Activities *	5.00	5.00	-	-	5.00	-	Negligible
Total PTE	**10.2**	**10.2**	**2.60**	**250.6**	**8.0**	**92.5**	**3.21**

* This is an estimate on the PM/PM10 emissions from the fugitive VOC emissions from equipment leaks, blowdown, and pressure relief valves.

** Pursuant to PSD-NM-1000-B, unit AUX-A02 can only operate when unit AUX-A01 is not in operation. Since unit AUX-01 has higher emissions than unit AUX-02 does, the total PTE for the entire source does not include the PTE for AUX-A02 (worst case scenario).

Public Notice

Public Notice

PROPOSED RENEWAL OF PART 71 PERMIT

EL PASO NATURAL GAS COMPANY

WHITE ROCK COMPRESSOR STATION

LOCATED NEAR NEWCOMB, NEW MEXICO

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) White Rock Compressor Station. The station performs natural gas inlet filtration, compression, and gas cooling for the purpose of natural gas transmission.

The White Rock Compressor Station is located 22 miles East of Newcomb, New Mexico in San Juan County on the Navajo Nation. The facility was initially constructed in 1966 and modified in 1991, 2005, and 2010. The facility currently consists of two natural gas-fired regenerative-cycle turbines (units A-01 and A-02), for gas compression, two natural gas-fired RICE generators (units AUX A-01 and AUX A-02), and two microturbine capstones (units AUX A-03 and AUX A-04), for auxiliary power. The recent Title V renewal application was received by NNEPA on May 26, 2022, within this renewal application the White Rock Compressor Station did not propose any changes to their facility or operations, all requirements have been carried over from the existing permit. 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), June 7, 2023.** Written comments will be considered prior to final permit decisions.

A public workshop will be held at White Rock Chapter House on May 26, 2023 (10am to 2pm). 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.

The applications, proposed air permits, and statements of basis are available for review at NNEPA, NAQCP/OPP website at: https://navajoepa.org. These materials may also be viewed in person at NNEPA/OPP office at 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).

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.

Response to Comments

DR. BUU NYGREN PRESIDENT
RICHELLE MONTOYA VICE PRESIDENT
The Navajo Nation | Yideeskąądi Nitsáhákees
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www.navajoepa.org/air-quality-control-program

Detailed Information
Permitting Authority: NNEPA

County: San Juan **State:** New Mexico **Plant ID: 35-045-NAV97**

Facility: El Paso Natural Gas Company, LLC – White Rock Compressor Station
Document Type: PART 71 OPERATING PERMIT – RESPONSE TO COMMENTS

NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY

Response to Comments on Draft Part 71 Permit to Operate
El Paso Natural Gas Company, LLC – White Rock Compressor Station
Permit # NN OP 23-008
August 18, 2023

Beginning on May 4, 2023, the Navajo Nation Environmental Protection Agency (NNEPA) had published El Paso Natural Gas Company, LLC – White Rock Compressor Station's public notice in the Navajo Times, Window Rock, AZ on May 4, 2023; the Gallup Independent, Gallup, NM on May 8, 2023; the Gallup Sun, Gallup, NM on May 12, 2023; the Farmington Daily Times, Farmington, NM on May 15, 2023; and the Navajo-Hopi Observer, Flagstaff, AZ on May 17, 2023. The public notice stated that El Paso Natural Gas Company, LLC – White Rock Compressor Station – located 22 miles East of Newcomb, New Mexico 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 two natural gas fired regenerative cycle turbines (units A-01 and A-02) for gas compression, two natural gas fired RICE generators (units AUX A-01 and AUX A-02), and two micro-turbine capstones (units AUX A-03 and AUX A-04) for auxiliary power.

The public notice also stated that White Rock Compressor Station did not propose any changes to their facility or operations. The public notice further provided information on how the public could review the draft permit and other relevant documentation. Finally, the public notice informed interested parties that they would have 30 days to comment on whether the permit should be issued as proposed. The initial public comment period ended on June 7, 2023.

On May 26, 2023, NNEPA conducted a public workshop on the draft Title V permit and the submissions of public comments at the White Rock Chapter House in White Rock, NM. During the public workshop White Rock community members were given an opportunity to submit a public comment. No public hearing was requested from the community.

This Response to Comments document provides responses to four (4) comments emailed to NNEPA from US EPA.

*Note that when permit changes were made because of an EPA comment, boldface text indicates added permit language and strikethrough text indicates deleted language.

Written comment emailed to NNEPA, received on July 26, 2024
Emailed Written Comment 1-4: Catherine Valladolid
Organization/Company: United States Environmental Protection Agency (US EPA)

Comment 1: *Removal of Emergency Affirmative Defense Provisions*
On July 21, 2023, the EPA finalized the removal of "emergency" affirmative defense provisions from the EPA's title V operating permit program regulations. These provisions established an affirmative defense that sources could have asserted in enforcement cases brought for noncompliance with technology-based emission limitations in operating permits, provided that the exceedances occurred due to qualifying emergency circumstances. These provisions, which have never been required elements of state operating permit programs, are being removed because they are inconsistent with EPA's interpretation of the enforcement structure of the Clean Air Act in light of prior court decisions from the U.S. Court of Appeals for the D.C. Circuit. (https://www.federalregister.gov/documents/2023/07/21/2023-15067/removal-of-title-v-emergency-affirmative-defense-provisions-from-state-operating-permit-programs-and)

Please remove Condition IV.N from the proposed permit.

Response to Comment 1:

NNEPA removed the Emergency Affirmative Defense Provisions from the permit. NNEPA also revised the Statement of Basis, Section 1.e. (Permitting and/or Construction History) to reflect the change.

The following revisions were made to the permit as a result of above EPA comments:

Permit:

~~**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 Condition 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.~~

Statement of Basis:

1. Facility Information

e. Permitting and/or Construction History

This plant was initially constructed in 1966 and originally consisted of one GE Frame 3 regenerative cycle turbine (A-01) for natural gas compression. On October 1, 1991, EPNG was issued permit PSD-NM-1000 by EPA Region VI for the modification of emission unit A-01 and the installation of one GE Frame 3 gas turbine (emission unit A-02) and two reciprocating combustion engines for auxiliary power generation (AUX A-01 and AUX A-02). On July 29, 2005, US EPA issued an addendum to PSD Permit NM 1000-B for the replacement of the existing emergency generator AUX A-01 with a smaller unit. In 2010, two Capstone C30 microturbines were installed at the facility (AUX A-03 and AUX A-04). The installation of these microturbines is considered to be an insignificant activity as the emissions are below the insignificant emission levels defined in 40 CFR 71.5(c)(11). The facility has not made any modification since the renewal in 2018. **On July 21, 2023, EPA finalized the removal of "Emergency" affirmative defense provisions from EPA's title V operating permit program regulations. In this permit renewal, the emergency provisions have been removed and three (3) existing storage tanks have been added as insignificant**

units, pursuant to 40 CFR Part 71.5(c)(11). With the exception of the Emergency affirmative defense provisions, all other applicable requirements have been retained from the previous permit and the addition of the storage tanks did not alter any applicable requirements.

Comment 2: *Enforcement Division Contact Information*
The enforcement contact information provided for the EPA Region 9's Enforcement Division and Air Permits Section in Conditions II.B.13.g, II.C.1, and IV.E is outdated. The addresses should be corrected to the following:

U.S. EPA, Region 9
Director, Enforcement and Compliance Assurance Division
Attn: Air Section, ENF-2-1
75 Hawthorne Street
San Francisco, CA 94105-3901

U.S. EPA, Region 9
Air and Radiation Division
Attn: Permits Section, AIR-3-1
75 Hawthorne Street
San Francisco, CA 94105

I also suggest that the CDX/CEDRI submission option for submittals to EPA Region 9's Enforcement Division either be duplicated in II.B.13.g and II.C.1 or the conditions reference the submissions methods listed in Condition IV.E.

Response to Comment 2:

NNEPA corrected the address as suggested by EPA.

The following revisions were made to the permit as a result of above EPA comments:

Permit:

II.B. PSD Permit Requirements [PSD Permit NM-1000-B]

13. The holder of this permit shall perform stack sampling and other testing to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from each turbine. [Permit no. PSD-NM-1000-B Special Condition VI.I]

g. Copies of the final sampling report shall be forwarded to NNEPA and the US EPA Region IX Office within 60 days after the sampling is completed. The report shall be sent to:

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

and

~~Manager, Air Section ENF-2-1~~
US EPA**,** Region ~~IX~~ **9**
Director, Enforcement **and Compliance Assurance** Division
Attn: Air Section, ENF-2-1
75 Hawthorne Street
San Francisco, CA 94105-3901

All reports can also be submitted through US EPA CDX/CEDRI portal consistent with submission methods listed in Section IV.E.

II.C. NSPS General Provisions

The following requirements apply to gas turbines A-01 and A-02 in accordance with 40 CFR Part 60, Subpart A ("General Provisions"):

1. All requests, reports, applications, submittals, and other communications to the Executive Director (NNEPA) pursuant to 40 CFR Part 60 shall be submitted in duplicate to the US EPA, Region ~~IX~~ **9** office at the following address [40 CFR § 60.4(a)]:

~~Manager, Air Section ENF-2-1~~
US EPA, Region ~~IX~~ **9**
Director, Enforcement and Compliance Assurance Division
Attn: Air Section, ENF-2-1
75 Hawthorne Street
San Francisco, CA 94105-3901

All documents can also be submitted through US EPA CDX/CEDRI portal consistent with submission methods listed in Section IV.E.

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

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

Comment 3: *Insignificant Activities and Emission Levels*
Section 3 of the Statement of Basis (SOB) discusses requirements that do not apply to the facility. Specifically, the SOB states that there are no storage vessels with large enough capacities to trigger NSPS requirements. Though insignificant activities and emissions units with insignificant emissions levels due to size or production rate may not be subject to permitting requirements, 40 CFR part 71 does not exempt these insignificant units from major source applicability determinations. Please include the potential to emit (PTE) of insignificant units in source-wide PTE calculations to determine applicability requirements, even if these activities and emissions units are not subject to permitting requirements (see 40 CFR 71.5 (c)(11)). Addition of these units to PTE calculations will not likely affect the applicability determinations in this action.

Additionally, for emissions units with insignificant emissions levels due to size or production rate, please include the PTE to show that the units have emissions of 2 tons per year or less of any regulated pollutants except HAP and 1000 pounds per year or less of any HAP. For example, if there are any tanks at the facility which may emit VOC or HAP, calculations should be provided to show that these emissions are below the mentioned thresholds.

Response to Comment 3:

NNEPA revised the Potential to Emit (PTE) calculations. Pursuant to 40 CFR Part 71.5 (c)(11), three (3) existing storage tanks have been added to Statement of Basis, Table-2 (List of Storage Tanks). Tank T-01 is used for storage of Coolant (contains about 50% Propylene Glycol and about 50 % water). Tank T-02 stores Lube Oil, and Tank T-03 contains used oil. Emissions from the tanks were calculated in accordance to the guidance provided in AP-42, Section 7.1. and have been incorporated into the facility wide PTE calculation. The VOC emissions from the tanks is below the insignificant level. A detail emission calculation is attached in Appendix A. The addition of the tanks did not affect the applicability determinations in this renewal action.

The following revisions were made to the permit as a result of above EPA comments:

Statement of Basis:

1. Facility Information

e. <u>Permitting and/or Construction History</u>

This plant was initially constructed in 1966 and originally consisted of one GE Frame 3 regenerative cycle turbine (A-01) for natural gas compression. On October 1, 1991, EPNG was issued permit PSD-NM-1000 by EPA Region VI for the modification of emission unit A-01 and the installation of one GE Frame 3 gas turbine (emission unit A-02) and two reciprocating combustion engines for auxiliary power generation (AUX A-01 and AUX A-02). On July 29, 2005, US EPA issued an addendum to PSD Permit NM 1000-B for the replacement of the existing emergency generator AUX A-01 with a smaller unit. In 2010, two Capstone C30 microturbines were installed at the facility (AUX A-03 and AUX A-04). The installation of these microturbines is considered to be an insignificant

activity as the emissions are below the insignificant emission levels defined in 40 CFR 71.5(c)(11). The facility has not made any modification since the renewal in 2018. **On July 21, 2023, EPA finalized the removal of "Emergency" affirmative defense provisions from EPA's title V operating permit program regulations. In this permit renewal, the emergency provisions have been removed and three (3) existing storage tanks have been added as insignificant units, pursuant to 40 CFR Part 71.5(c)(11). With the exception of the Emergency affirmative defense provisions, all other applicable requirements have been retained from the previous permit and the addition of the storage tanks did not alter any applicable requirements.**

g. <u>Insignificant Emissions</u>

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 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.

vi. Storage tank emissions. Table 2 contains a list of storage tanks present at the facility.

Table 2. List of Storage Tanks

Tank No.	Date of Installation	Capacity (gal)	Liquid Stored
T-01	1966	4,200	Coolant
T-02	1966	8,820	Lube Oil
T-03	1991	10,565	Used Oil

i. Potential to Emit

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**	**NOx**	**VOC**	**CO**	**Total HAPs**
A-01	2.29	2.29	1.18	177	0.73	32.1	0.34
A-02	2.71	2.71	1.40	66.4	0.86	46.8	0.40
AUX A-01	0.12	0.12	0.01	7.05	1.34	13.2	2.47
AUX A-02**	-	-	-	-	-	-	-
AUX A-03 & AUX A-04	0.03	0.03	0.02	0.16	0.06	0.43	0.00
Tank Emissions	**-**	**-**	**-**	**-**	**2.4E-03**	**-**	**-**
Insignificant Emissions*	less than 5.00	less than 5.00	-	-	less than 5.00	-	negligible
PTE of the Entire Source	10.2	10.2	2.60	250.6	8.0	92.5	3.21
Title V Major Source Thresholds	100	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

*This is an estimate of emissions from blowdown activities and the fugitive VOC from equipment leaks
**Pursuant to PSD-NM-1000-B, unit AUX A-02 can only operate when unit AUX A-01 is not in operation. Since unit AUX A-01 has higher emission rates than unit AUX A-02, the total PTE for the entire source does not include the PTE for AUX A-02 (worst case scenario).
***$PM_{2.5}$ is conservatively assumed to be equal to PM_{10}.

Comment 4: *EPA Contact*
Please correct the EPA Contact in Section I from Catherine Valladolid to Noelle Mushro, (415) 972-3987

Response to Comment 4:

NNEPA corrected the EPA contact as suggested by EPA.

The following revisions were made to the permit as a result of above EPA comments:

Permit:

I. Source Identification

- EPA Contact: ~~Catherine Valladolid~~ **Noelle Mushro** Phone: (415) ~~947~~**972**-~~4103~~**3987**