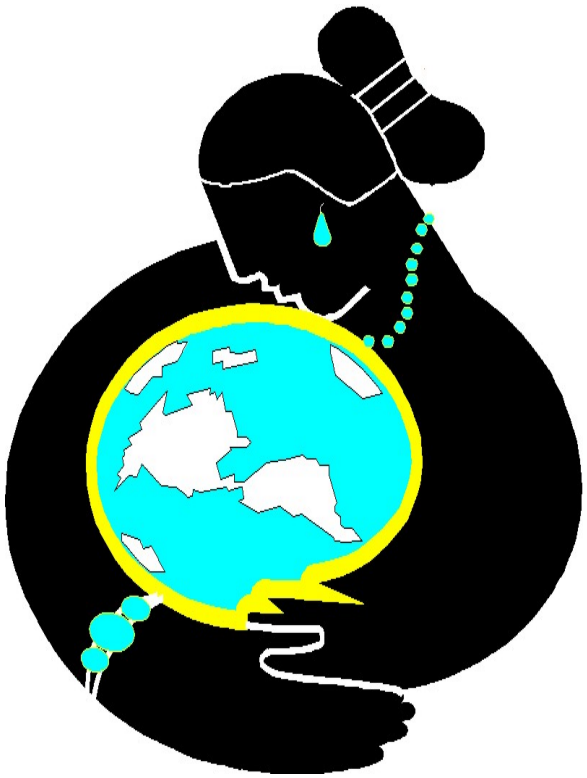

Navajo Nation Environmental Protection Agency
Navajo Nation Operating Permit Program

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

Permit No: NN OP 23-009

Permit: 2023

THE NAVAJO NATION

JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

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

TITLE V PERMIT TO OPERATE

PERMIT #:	FACILITY NAME:	LOCATION:	COUNTY:	STATE:
NN OP 23-009	WINDOW ROCK COMPRESSOR STATION	WINDOW ROCK	APACHE	AZ

ISSUE DATE:	EXPIRATION DATE:	AFS PLANT ID:	PERMITTING AUTHORITY:
01/06/2023	01/06/2028	04-001-N0611	NNEPA

ACTION/STATUS: PART 71 OPERATING PERMIT

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

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

Mr Baca,

This permit is being issued and administered by the Navajo Nation Environmental Protection Agency ("NNEPA") pursuant to the Delegation Agreement between the United States Environmental Protection Agency ("USEPA" or "EPA") Region IX and NNEPA, dated October 15, 2004. In accordance with the provisions of Title V of the Clean Air Act, 40 CFR Part 71, Navajo Nation Operating Permit Regulations ("NNOPR"), and all other applicable rules and regulations, the permittee, El Paso Natural Gas Company – Window 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.

Valinda Shirley, Executive Director
Navajo Nation Environmental Protection Agency

THE NAVAJO NATION

JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

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www.navajonationepa.org

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 – Window Rock Compressor Station, located at Section 34, Township 26-N, Range 30-E, 22 miles West of Gallup, 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 USEPA Region IX and NNEPA, and all other applicable rules and regulations. The Permittee, El Paso Natural Gas Company, LLC – Window 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 – Window Rock Compressor Station's draft permit public noticed in the Gallup Independent, Gallup, NM on October 17, 2022; the Navajo-Hopi Observer, Flagstaff, AZ on October 19, 2022; the Navajo Times, Window Rock, AZ on October 20, 2022; the Holbrook Tribune, Holbrook, AZ on October 26, 2002; and the Arizona Daily Times, Flagstaff, AZ on October 28, 2022. NNEPA also sent out Affected State, Local, and Tribal letters to the Arizona Department of Environmental Quality, New Mexico Environment Department – Air Quality Bureau, Utah Department of Environmental Quality, Southern Ute Indian Tribe, Ute Mountain Ute Indian Tribe, Hopi Tribe Department of Natural Resources, and the Colorado Department of Public Health and Environment.

The initial public comment period ended on November 17, 2022. On November 2, 2022, NNEPA conducted an informational session (public workshop) on the draft permit renewal and the submission of public comments at the St. Michaels Chapter House in St. Michaels, AZ. No public hearing was requested from the community and no public comments were received.

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

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

Valinda Shirley, Executive Director
Navajo Nation Environmental Protection Agency

CC: Lisa Beckham, US EPA Region IX

Title V Operating Permit

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 22-009	WINDOW ROCK COMPRESSOR STATION	WINDOW ROCK	APACHE	AZ

ISSUE DATE:	EXPIRATION DATE:	AFS PLANT ID:	PERMITTING AUTHORITY:
01/06/2023	01/06/2028	04-001-N0611	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, Inc.	
• Parent Company Address:	1001 Louisiana Street, Suite 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:	Window Rock Compressor Station	
• Plant Location:	Section 34, Township 26-N, Range 30-E 22 miles West of Gallup, New Mexico	
• County:	Apache, Arizona	
• EPA Region:	IX	
• Reservation:	Navajo Nation	
• Company Contact:	Richard Duarte	Phone: (505) 831-7763
• Responsible Official:	Philip L. Baca	Phone: (520) 663-4224
• EPA Contact:	Lisa Beckham	Phone: (415) 972-3811
• Tribal Contact:	Natasha Yazzie	Phone: (928) 729-4248
	Suresh Chaudhary	Phone: (928) 729-4249
• SIC Code:	4922	
• AFS Plant ID	04-001-N0611	
• 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/ Stack ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
A-01 through A-06	Six (6) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp (each)	1958	N/A
A-07	One (1) natural gas-fired simple-cycle turbine, Solar Centaur H 50-T5502S equipped with a Dry Low NOx Combustor and CEMS	42.3 MMBtu/hr 4,530 hp	1992	N/A
B-01	One (1) natural gas-fired engine, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp	1959	N/A
B-02 and B-03	Two (2) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp (each)	1960	N/A
B-04	One (1) natural gas-fired engine, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp	1964	N/A
B-05	One (1) natural gas-fired engine, Worthington SUTC-1610	20.5 MMBtu/hr 2,700 hp	1964	N/A
B-06	One (1) natural gas-fired engine, Worthington M L-10	21.3 MMBtu/hr 2,800 hp	1966	N/A
AUX B-04 through AUX B-11	Two (2) Capstone microturbine packages (consisting of eight (8) C200 units) for auxiliary power	2.3MMBtu/hr 268.1 hp (ISO) (each)	2009	N/A

II. Requirements for Specific Units

II.A. Monitoring and Performance Testing

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

    a. For engines A-01 through A-06, and B-01through B-06, during this five-year permit term the permittee shall initiate a testing schedule that ensures each engine will be tested at least once every 15 calendar years for NOx, CO, and VOC. Testing for these pollutants shall occur simultaneously. At least four engines shall be tested during this permit term.

    b. For turbine A-07, during this five-year permit term the permittee shall conduct at least one performance test that includes VOC in conjunction with the test requirement stated in condition II.B.5. Testing for NOx, CO and VOC shall occur simultaneously. Thereafter, the permittee shall implement a testing

schedule that ensures the turbine is tested at least once every 5 calendar years for NOx, CO and VOC.

2. For micro turbines AUX B-04 through AUX B-11, the permittee shall monitor NOx and CO emissions by measuring and recording NOx, CO, and O_2 concentrations, simultaneously, using a portable analyzer in accordance with EPA Method OTM 13 or ASTM 6522. NOx and CO emissions shall be monitored on one micro turbine once per permit term. [40 CFR § 71.6(a)(3)(i)(B)]

II.B. PSD Permit Requirements [PSD Permit AZP 90-1]

1. The permittee shall not discharge or cause the discharge into the atmosphere of NOx (as NO_2) in excess of the more stringent of 6.1 lb/hr or 42 ppmvd of NOx at 15% O_2 (3-hour rolling average, ISO conditions) from the stack venting gas from turbine A-07. [PSD permit AZP 90-1 Condition IX.D; 40 CFR § 60.332(a)(2)]

2. The permittee shall not discharge or cause the discharge into the atmosphere of CO in excess of the more stringent of 5.10 lb/hr or 50 ppmvd at 15% O_2 (3-hour rolling average) from the stack venting gas from turbine A-07. [PSD Permit AZP 90-1 Condition IX.D]

3. The permittee shall not discharge or cause the discharge into the atmosphere of any gases with an opacity in excess of 10% (six-minute rolling average) from the stack venting the Solar Centaur H gas transmission turbine (unit A-07). [PSD permit AZP 90-1 Condition IX.D]

Work Practice and Operational Requirements

4. The permittee shall install and continuously operate a dry low NOx combustor for control of NOx emissions from gas turbine A-07. [PSD permit AZP 90-1 Condition IX.B]

Monitoring and Testing Requirements

5. Annually, and at such other times as specified by NNEPA, the permittee shall conduct performance tests for NOx and CO emissions from gas turbine A-07 and furnish US EPA Region IX and NNEPA a written report of the results of such tests. The tests for NOx and CO shall be conducted at the maximum operating capacity of the facility. Upon written request from the permittee, US EPA and NNEPA may approve the conducting of performance tests at a lower specified production rate. Also, after initial performance tests and upon written request from the permittee, US EPA and NNEPA may approve the deletion of a specific annual test for the combustion units. [PSD permit AZP 90-1 Condition IX.C.1.a and b]

6. Performance tests for the emissions of NOx and CO_2 from gas turbine A-07 shall be conducted and the results reported in accordance with the testing and reporting requirements set forth in 40 CFR § 60.8 and the test methods set forth in 40 CFR Part 60, Appendix A. These performance tests shall be conducted using US EPA Methods 1-4, 7E and 19. [PSD permit AZP 90-1 Condition IX.C.2]

7. US EPA Region IX and NNEPA shall be notified in writing at least 30 days prior to performance tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. Such prior approval will minimize the possibility of US EPA Region IX and NNEPA rejecting test results for procedural deficiencies. In lieu of US EPA Methods 1-4, 7E and/or 19, equivalent test methods may be used with prior written approval from US EPA Region IX and NNEPA. [PSD permit AZP 90-1 Condition IX.C.2]

8. For performance test purposes, sampling ports, platforms, and access to platforms shall be provided by the permittee on the combustion exhaust system in accordance with 40 CFR § 60.8(e). [PSD permit AZP 90-1 Condition IX.C.3]

9. The permittee shall install, maintain, and operate the following continuous monitoring systems in the stack venting gas turbine A-07 [PSD permit AZP 90-1 Condition IX.E.1.a and b]:

    a. Continuous monitoring systems to measure stack gas NOx, CO, and O_2. The systems shall meet US EPA monitoring performance specifications. [40 CFR Part 60, Appendix B, Performance Specifications 2, 3, and 4]

    b. A continuous monitoring system to measure or calculate stack gas volumetric flow rates. The system shall meet US EPA monitoring performance specifications. [40 CFR Part 60, Appendix B, Performance Specification 6]

10. Upon submittal of a minimum of one (1) year of simultaneous on-site data from a continuous emission monitoring system (CEMS) meeting US EPA monitoring performance specifications and an alternative continuous monitoring system prior to the retrofit of the dry low NOx combustor, and one (1) year minimum of simultaneous on-site data from a CEMS meeting US EPA monitoring performance specifications and an alternative continuous monitoring system after the retrofit of the dry low NOx combustor, the permittee shall have the opportunity to demonstrate that, at this site, the alternative continuous monitoring system is equivalent to the CEMS meeting US EPA monitoring performance specifications. After the above demonstration has been made to the satisfaction of US EPA Region IX and NNEPA, and upon written approval from US EPA Region IX and NNEPA, the permittee may replace the CEMS with the alternative continuous monitoring system. [PSD Permit AZP 90-1 Condition IX.E.2]

11. The permittee shall maintain a quality assurance project plan for the certification and operation of every CEMS and alternative continuous monitoring system. Such a plan shall conform to the quality assurance procedures set forth in 40 CFR Part 60, Appendix F, "Quality Assurance Procedures." [PSD Permit AZP 90-1 Condition IX.E.6]

Recordkeeping Requirements

12. 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. [PSD permit AZP 90-1 Condition IX.E.7; 40 CFR 60.7(f)]

Reporting Requirements

13. The permittee shall submit a written report of all excess emissions to US EPA Region IX and NNEPA for every calendar quarter. The report shall include the following [PSD permit AZP 90-1 Condition IX.E.3; 40 CFR § 60.7(c)]:

    a. The magnitude of excess emissions computed in accordance with 40 CFR § 60.13(h), any conversion factors(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period shall also be reported.

    b. Specific identification of each period of excess emissions that occurred during start-ups, shutdowns, and malfunctions of any compressors. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted shall also be reported.

    c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.

    d. When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report.

    e. Excess emissions shall be defined as the following [40 CFR § 60.331(t)]:

i. Any three-hour period during which the average emissions of NOx and/or CO, as measured by the continuous monitoring system or by a performance test, exceed the maximum emission limits set forth for each of the pollutants in Condition II. B.1 and II. B.2 above.

ii. Any six-minute period during which the average opacity as detected in accordance to 40 CFR § 60.11 exceeds the maximum emission limit set forth in Condition II.B.3 above.

f. Excess emissions indicated by the CEMS shall be considered violations of the applicable emission limits for the purposes of this permit.

Facilities Operation

14. All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of the PSD Permit shall at all times be maintained in good working order and be operated as intended so as to minimize air pollutant emissions. [PSD permit AZP 90-1 Condition III]

Malfunction

15. The Director, Enforcement and Compliance Assurance Division, U.S. Environmental Protection Agency, Region IX, to the attention of Mail Code: ENF-2-1, at 75 Hawthorne Street, San Francisco, California 94105, (415) 947-8000, AEO_R9@epa.govand the Executive Director, Navajo Nation Environmental Protection Agency, P.O. Box 339, Window Rock, Arizona 86515, (928) 871-7692, (928) 871-7996 (facsimile), shall be notified by telephone (or email) within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Condition II.B of this permit. In addition, US EPA Region IX and NNEPA shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Condition II. B of this permit, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of this permit or of any law or regulation which such malfunction may cause. [PSD permit AZP 90-1 Condition IV]

Transfer of Ownership

16. In the event of any changes in control or ownership of the facilities to be constructed, the PSD Permit shall be binding on all subsequent owners and operators. The applicant shall notify the succeeding owner and operator of the existence of the PSD Permit and its conditions by letter, a copy of which shall be forwarded to the EPA Regional

Administrator, the State and local air pollution control agencies, and NNEPA. [PSD permit AZP 90-3 Condition VI]

Other Applicable Regulations

17. The permittee shall construct and operate this facility in compliance with all other applicable provisions of 40 CFR Parts 60 61 and 82 and all other applicable federal, state and local air quality regulations. [PSD permit AZP 90-3 Condition VIII]

II.C. NSPS General Provisions

The following requirements apply to gas turbine A-07 in accordance with 40 CFR Part 60, Subpart A ("General Provisions"):

1. All requests, reports, applications, submittals, and other communications to the Administrator pursuant to 40 CFR Part 60 shall be submitted in accordance to condition IV.E. [40 CFR § 60.4(a)]:

2. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of EPNG Window 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.D.1 of this permit shall be determined in accordance with performance tests established by 40 CFR § 60.8 or with Condition II.D.2 of this permit. [40 CFR § 60.11(a)]

5. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate EPNG Window 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 Window Rock or any physical or operational change to EPNG Window 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 gas turbine A-07 in accordance with 40 CFR Part 60, Subpart GG ("Standards of Performance for Stationary Gas Turbines"):

1. The permittee shall not burn any gaseous fuel in gas turbine A-07 which contains a maximum total sulfur content exceeding 20.0 grains/100 scf. [40 CFR § 60.331(u)]

2. The permittee shall not burn in gas turbine A-07 any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw). [40 CFR § 60.333(b)]

3. The permittee has elected not to monitor the total sulfur content of the gaseous fuel combusted in gas turbine A-07 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)]

4. To demonstrate compliance under 40 CFR § 60.334(h)(3), the permittee will provide a copy of the gas quality section of its current tariff from the Federal Energy Regulatory Commission (FERC) and certify at least once every six months that the fuel being fired in gas turbine A-07 satisfies the definition of "natural gas" in 40 CFR § 60.331(u). [40 CFR § 60.334(h)(3)]

5. Each CEMS must be installed and certified according to performance specifications 2 and 3 (for diluent) of 40 CFR Part 60, Appendix B, except the 7-day calibration drift is based on unit operating days, not calendar days. 40 CFR Part 60, Appendix F, Procedure 1 is not required. The relative accuracy test audit (RATA) of the NOx and diluent monitors may be performed either:

   a. On a ppm basis (for NOx) and a percent O_2 basis for oxygen; or

   b. On a ppm basis at 15 percent O_2; or

   c. On a ppm basis (for NOx) and a percent CO_2 basis (for a CO_2 monitor that uses the procedures in 40 CFR Part 60, Appendix A, Method 20 to correct the NOx data to 15 percent O_2).

   [40 CFR §§ 60.334(b)(1) and 60.334(c)]

6. The CEMS or alternative continuous monitoring system approved under Condition II. B.10 on gas turbine A-07 must be in compliance with the operating frequency and data collection requirements specified in 40 CFR § 60.13(e)(2) and 40 CFR §§ 60.334(b)(2). [40 CFR §§ 60.334(b)(2) and 60.334(c)].

7. For purposes of identifying excess emissions, CEMS or approved alternative continuous monitoring system data must be reduced to hourly averages as specified in 40 CFR § 60.13(h). [40 CFR §§ 60.334(b)(3) and 60.334(c)]

   a. For each unit operating hour in which a valid hourly average, as described in Condition II.D.5 of this permit, is obtained for both NOx and diluent, the data acquisition and handling system must calculate and record the hourly NOx emissions in the units of the applicable NOx emission standard under 40 CFR § 60.332(a), i.e., percent NOx by volume, dry basis, corrected to 15 percent O_2 and ISO standard conditions (if required as given in 40 CFR § 60.335(b)(1)). For any hour in which the hourly average O_2 concentration exceeds 19.0 percent O_2, a diluent cap value of 19.0 percent O_2 may be used in emission calculations.

   b. A worst-case ISO correction factor may be calculated and applied using historical ambient data. For the purpose of this calculation, substitute the

maximum humidity of the ambient air (H_o), minimum ambient temperature (T_a), and minimum combustor inlet absolute pressure (P_o) into the ISO correction equation.

8. For performance tests conducted as required by this permit, sampling traverse points are to be selected following 40 CFR Part 60, Appendix A, Method 20 or Method 1 (non-particulate procedures) and sampled for equal time intervals. The sampling shall be performed with a traversing single-hole probe or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points. [40 CFR § 60.335(a)(4)]

9. The permittee shall determine compliance with the applicable nitrogen oxides emission limitation in Condition II.B.1 and 40 CFR § 60.332 and shall meet the performance test requirements of 40 CFR § 60.8 as follows: [40 CFR § 60.335(b)(1)]

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

   $$NO_X = (NO_{Xo})(P_r/P_o)^{0.5} e^{19(Ho-0.00633)} (288°K/T_a)^{1.53}$$

   Where:

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

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

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

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

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

   e = transcendental constant, 2.718, and

   T_a= ambient temperature, °K.

10. The 3 run performance test required by 40 CFR § 60.8 must be performed within ± 5 percent at 30, 50, 75, and 90 to 100 percent of peak load or at four evenly spaced load points in the normal operating range of the gas turbine, including the minimum point in the operating range and 90 to 100 percent of peak load, or at the highest achievable load point if 90 to 100 percent of peak load cannot be physically achieved in practice. If the turbine combusts both oil and gas as primary backup fuels, separate performance testing is required for each fuel. Notwithstanding these requirements, performance testing is not required for any emergency fuel. [40 CFR § 60.335(b)(2)]

11. Gas turbine A-07 is exempt from compliance with Condition II. B.1 and 40 CFR § 60.332(a)(2) when being fired with an emergency fuel. [40 CFR § 60.332(k)]

12. Each period during which an exemption provided in Condition II. D.10 is in effect shall be included in the report required in Condition II. B.13, which shall include the type, reasons, and duration of the firing of the emergency fuel. [40 CFR § 60.334(j)(4)]

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

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

2. For applicable requirements that will become effective during the permit term, EPNG Window 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.F. 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 Window 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 requirement in Condition II. E.3; 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.E.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 Apri 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 U.S. 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 IX only, pursuant to 40 CFR § 71.6(a)(6)(v), at the permittee's discretion.) Information claimed to be confidential should be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit to NNEPA such supplementary facts or corrected information. The permittee shall also provide additional information to NNEPA as necessary to address any requirements that become applicable to the facility after this permit is issued.

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

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

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

For EPA :

Central Data Exchange/Compliance and Emission Data Reporting Interface (CDX/CEDRI) or in hardcopy through postal service at the addresses listed below. Items sent by postal service shall be postmarked by the applicable due date identified in this permit.

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

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

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

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

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

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

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

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

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

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

1. Corrects typographical errors.

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source.

3. Requires more frequent monitoring or reporting by the permittee.

4. Allows for a change in ownership or operational control of a source where NNEPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to NNEPA.

5. Incorporates into the permit the requirements from preconstruction review permits authorized under a US EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR §§ 71.7, 71.8 and 71.10 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR § 71.6.

6. Incorporates any other type of change which NNEPA has determined to be similar to those listed above in 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. 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.

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

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

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

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

1. Each change is not addressed or prohibited by this permit;

2. Each change must comply with all applicable requirements and must not violate any existing permit term or condition;

3. Changes under this provision may not include changes or activities subject to any requirement under CAA Title IV or that are modifications under any provision of CAA Title I;

4. The permittee must provide contemporaneous written notice to NNEPA and US EPA Region IX of each change, except for changes that qualify as insignificant activities under 40 CFR § 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change; and

5. The permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit and the emissions resulting from those changes.

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

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

   a. 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

THE NAVAJO NATION

JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

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

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

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

www.navajoepa.org

Detailed Information

Permitting Authority: Navajo Nation Environmental Protection Agency

County: Apache **State:** Arizona **AFS Plant ID:** 04-001-N0611

Facility: Window Rock Compressor Station

Document Type: STATEMENT OF BASIS

Part 71 Federal Operating Permit
Statement of Basis

El Paso Natural Gas Company, LLC
Window Rock Compressor Station
Permit No. NN OP 22-009

1. Facility Information

a. Permittee

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

b. Facility Location

Section 34, Township 26-N, Range 30-E
22 miles West of Gallup, New Mexico in Apache County, AZ

c. Contact Information

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

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

d. Description of Operations, Products:

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

e. Permitting and/or Construction History

The Window Rock Compressor Station was initially constructed in 1958 with six engines (A-01 through A-06) and three auxiliary generators (AUX A-01 through AUX A-03). The reciprocating units B-01 through B-06 were added to the facility between 1959 and 1966. The source was issued a PSD permit (AZP 90-1) by US EPA for the installation of a Solar Centaur H simple-cycle turbine (A-07) on October 25, 1991. As required by the PSD permit, EPNG Window Rock operates a dry low NOx combustor for control of NOx emissions from the turbine and has installed a continuous emission monitoring system (CEMS) to ensure that the NOx and CO emissions are below 6.1 lb/hr and 5.1 lb/hr respectively.

In December 2009, the three auxiliary engines (AUX A-01 through AUX A-03) were permanently shut down and replaced with eight microturbines (AUX B-04 through AUX B-11) for auxiliary power. These microturbines are grouped into two packages comprised of a Model C1000 (consisting of five C200 units) and a Model C600 (consisting of three C200 units). However, since the eight microturbines can each be operated independently, each one is considered a separate emission unit. On October 18, 2010, NNEPA received an application for a Minor Modification from EPNG Window Rock requesting the removal of the three natural gas-fired auxiliary engines (AUX A-01 through AUX A-03) from the permit and the addition into the permit of the two microturbine packages that replaced the auxiliary engines. NNEPA determined that these changes qualified as minor permit modifications and on May 27, 2011 issued a Minor Modification to the permit that was issued on October 7, 2008.

In February 2011 EPNG Window Rock brought on site four heaters with 1.6 MMBtu/hr heat input each that use propane gas and were used for a few days in February 2011 during a period of sub-freezing temperatures and the heaters have not been used since.

The initial Title V permit for this source was issued by US EPA on December 25, 2000 and was renewed by NNEPA on October 7, 2008. The second Title V permit renewal application was received by NNEPA on April 4, 2013 and renewed on September 24, 2015. The third Title V permit renewal application was received by NNEPA on March 20, 2020. The facility has not made any modification since permit renewal in 2015.

f. Permitted Emission Units and Control Equipment

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

Table 1. List of Emission Units

Unit ID/ Stack ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
A-01 through A-06	Six (6) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp (each)	1958	N/A
A-07	One (1) natural gas-fired simple-cycle turbine, Solar Centaur H 50-T5502S equipped with a Dry Low NOx Combustor and CEMS	42.3 MMBtu/hr 4,530 hp	1992	N/A
B-01	One (1) natural gas-fired engine, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp	1959	N/A
B-02 and B-03	Two (2) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp (each)	1960	N/A
B-04	One (1) natural gas-fired engine, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp	1964	N/A
B-05	One (1) natural gas-fired engine, Worthington SUTC-1610	20.5 MMBtu/hr 2,700 hp	1964	N/A
B-06	One (1) natural gas-fired engine, Worthington ML-10	21.3 MMBtu/hr 2,800 hp	1966	N/A
AUX B-04 through AUX B-11	Two (2) Capstone microturbine packages (consisting of eight (8) C200 units) for auxiliary power	2.3 MMBtu/hr 268.1 hp (ISO) (each)	2009	N/A

g. Insignificant Emissions

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

i. Fugitive VOC emissions from connections, flanges, open-ended lines, valves, and other components.

ii. Emissions released during the use of the emergency shutdown system and pressure relief valves.

iii. Emissions released during blowdown activities (during startup and shutdown).

iv. Fire pump and air compressor engine emissions.

v. Emissions released from 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 Installed	Capacity (gal)	Liquid Stored
T-01	1958	4,225	Lube Oil
T-02	1958	754	Used Oil
T-03	1958	754	Used Oil
T-04	1958	530	Oil
T-05	1958	8,220	Used Oil
T-06	1958	150	Used Oil
T-07	1958	8,220	Oil
T-08	1958	754	Used Oil
T-09	1958	754	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 Window 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 presented in Tables 3 and 4 below were calculated by EPNG and presented in its permit application.

Table 3. Potential to Emit of Criteria Air Pollutants

Emission Unit ID	Regulated Air Pollutants in tons per year (tpy)						
	PM-2.5**	PM-10	SO_2	NOx	VOC	CO	Total HAPs
A-01 – A-06	29.0	29.0	0.4	1955.2	71.9	1293.0	39.7
A-07	1.5	1.5	0.8	26.7	7.9	22.3	0.2
B01 – B06	29.9	29.9	0.4	2018.3	74.3	1188.7	41.0
AUX B-04 through AUX B-11	0.7	0.7	0.3	3.9	0.8	2.3	0.1
Insignificant Emissions*	less than 5.00	less than 5.00	-	-	less than 5.00	-	negligible
PTE of the Entire Source	**66.0**	**66.0**	**1.8**	**4004.1**	**159.9**	**2506.4**	**81.0**
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 the cooling towers and the fugitive VOC from equipment leaks
**PM 2.5 is conservatively assumed to be equal to PM-10

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

Emission Unit	Greenhouse Gas Emissions (CO_2 equivalent metric tons)
A-01 – A-06	58,422.2
A-07	21,678.3
B01 – B06	60,369.6
AUX B-04 through AUX B-11	9,346.1
Total	**149,816.2**

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

These regulations apply to steam generators. The Window Rock Compressor station does not have any steam generating units, therefore, these subparts do not apply.

b. 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 turbine A-07 located at EPNG Window Rock because it was installed prior to February 18, 2005 and has not been modified or reconstructed.

On December 21, 2009, EPNG replaced three natural gas-fired auxiliary engines with eight natural gas microturbines (AUX B-04 through AUX B-11). 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 2.3 MMBtu/hr, the turbines AUX B-04 through AUX B-11 are not subject to the requirements of 40 CFR Part 60, Subpart KKKK.

c. 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 Window Rock; therefore, this subpart does not apply.

d. **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 Window 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.

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

These regulations apply to storage vessels for petroleum liquids with storage capacities greater than 40,000 gallons and do not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer. There is no storage tank with a capacity greater than 40,000 gallons located on-site. The individual capacities of storage tanks T-01 through T-09 located at EPNG Window Rock are less than 40,000 gallons. In addition, all storage tanks at EPNG Window Rock were installed in 1958. For these reasons, subpart K does not apply.

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

These regulations apply to storage vessels for petroleum liquids with storage capacities greater than 40,000 gallons and do not apply to petroleum storage vessels with capacities of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer. There is no storage tank with a capacity greater than 40,000 gallons located on-site. The individual capacities of

storage tanks T-01 through T-09 located at EPNG Window Rock are less than 40,000 gallons. In addition, all storage tanks at EPNG Window Rock were installed in 1958. For these reasons, subpart Ka does not apply.

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

These regulations apply to storage vessels with capacities greater than or equal to 75 cubic meters (471 bbl). There is no storage tank with a capacity greater than 75 cubic meters located on-site. The individual capacities of storage tanks T-01 through T-09 located at EPNG Window Rock are less than 75 cubic meters; therefore, subpart Kb does not apply.

h. 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. The engines located at EPNG Window Rock are spark-ignition engines (natural gas-fired); therefore, subpart IIII does not apply.

i. 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. The SI ICE located at EPNG Window Rock were all constructed before June 12, 2006 and have not been modified or reconstructed after June 12, 2006; therefore, subpart JJJJ does not apply.

j. 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 Window Rock was constructed, modified or reconstructed after August 23, 2011; therefore, subpart OOOO does not apply.

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

This regulation applies to affected facilities for which construction, modification or reconstruction commenced after September 18, 2015, including some components of compressor stations. Window Rock compressor station does not have any affected equipment that commenced construction, modification or reconstruction after September 18, 2015; therefore, subpart OOOOa does not apply.

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

m. **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 Window Rock compressor station is a natural gas transmission facility potentially subject to this subpart; however, EPNG Window Rock does not have any glycol dehydration units. Therefore, subpart HHH does not apply.

n. 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 Window Rock is a major source of HAP emissions; however, the turbine A-07 at the facility was constructed before January 14, 2003. Therefore, the turbine A-07 located at the facility is not subject to subpart YYYY.

The eight microturbines AUX B-04 through AUX B-11 were constructed in 2009, 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 exempt from the requirements of subpart YYYY pursuant to 40 CFR § 63.6090(b)(3).

o. NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR §§ 63.6580 – 63.6675; 40 CFR Part 63, Subpart ZZZZ)

These regulations establish 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 Window Rock compressor station is a major source of HAP emissions and has twelve (12) 2-stroke lean burn engines. Pursuant to 40 CFR § 63.6590(b)(3)(i), the twelve 2-stroke lean burn engines, which all have a site rating of more than 500 brake HP, do not have to meet the requirements of this Subpart. Engines AUX-01 through AUX-03, which were subject to this Subpart, have been permanently shut down since December 2009. Therefore, Subpart ZZZZ does not apply.

p. NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR §§ 63.7480 – 63.7575; 40 CFR Part 63, Subpart DDDDD)

These regulations establish national emission limitations and work practice standards for hazardous air pollutants emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions as well as compliance requirements related to these limitations and standards. The EPNG Window Rock compressor station is a major source of HAP emissions and brought on site four propane heaters in February 2011 to keep the water lines from freezing. These heaters do not meet the definition of a process heater under 40 CFR § 63.7575 because their primary purpose is not to transfer heat indirectly to a

process material or to heat a transfer material for use in a process unit. 40 CFR § 63.7575 specifically excludes heaters used for space heat from the definition of "process heater." Therefore, the propane heaters are not affected sources under 40 CFR § 7490 and subpart DDDDD does not apply.

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

r. 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 Window 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.

In accordance with PSD Permit AZP 90-1 Condition IX.B, emission unit A-07 operates a Dry Low-NOx Combustor for control of NOx emissions, but a Dry Low-NOx Combustor is not considered a control device under 40 CFR § 64.1 because it acts as a passive control measure. Further, this Part 71 permit incorporates the PSD Permit AZP 90-1 Condition IX.E requiring the use of a continuous emission monitoring system (CEMS) for NOx and CO as a compliance determination method in Condition II.A. 40 CFR § 64.2(b)(1)(vi) exempts from CAM requirements emission limitations for which a Title V permit requires a "continuous compliance determination method." A CEMS meets the definition of this term in 40 CFR § 64.1. Therefore, turbine A-07 is exempt from CAM requirements for NOx and CO.

4. Applicable Requirements

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

Table 5. Summary of Applicable Federal Requirements

Applicable Requirements	Emission Point/Unit
Federal Air Quality Requirement	A-01 through A-07, B-01 through B-06, AUX B-04 through AUX B-11
PSD Permit AZP 90-1	A-07
NSPS Subpart A (General Provisions)	A-07
NSPS Subpart GG (Gas Turbines)	A-07
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 Window 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 emissions increase pursuant to 40 CFR 52.21(a)(2).

EPNG Window Rock was constructed in 1958 and modified in 1959, 1960, 1964, 1966, 1992, and 2009. The initial construction of this source in the 1950s and the modifications in the 1960s predated the PSD applicability date and were not subject to the PSD program. See 40 CFR 52.21(i)(1)(i). The 2009 modifications (removing three auxiliary engines and adding eight microturbines) were minor modifications that did not result in a significant emissions increase. The modification that commenced in 1992 (the installation of the Solar Centaur simple cycle turbine A-07) did involve significant emissions increases of NOx and CO as defined in 40 CFR § 52.21. Therefore, US EPA issued PSD permit AZP 90-1 on October 25, 1991 for the installation of unit A-07. This permit contained the following limits for NOx and CO for turbine A-07 to meet the requirements of PSD:

(i) The permittee shall not discharge or cause the discharge into the atmosphere of NOx (as NO_2) in excess of the more stringent of 6.1 lb/hr or 42 ppmvd of NOx at 15% O_2 (3-hour rolling average, ISO conditions) from the stack venting gas from turbine A-07. [PSD permit AZP 90-1 Condition IX.D; 40 CFR 60.332(a)(2)]

(ii) The permittee shall not discharge or cause the discharge into the atmosphere of CO in excess of the more stringent of 5.10 lb/hr or 50 ppmvd at 15% O_2 (3-hour rolling average) from the stack venting gas from turbine A-07. [PSD Permit AZP 90-1 Condition IX.D]

(iii) The permittee shall not discharge or cause the discharge into the atmosphere of any gases with an opacity in excess of 10% (six-minute rolling average) from the stack venting the Solar Centaur H gas transmission turbine (unit A-07). [PSD permit AZP 90-1 Condition IX.D]

(iv) The permittee shall install and continuously operate a dry low NOx combustor for control of NOx emissions from gas turbine A-07. [PSD permit AZP 90-1 Condition IX.B]

PSD Permit AZP 90-1 additionally requires the use of a continuous emissions monitoring system (CEMS) to monitor NOx, CO, and O_2 from gas turbine A-07.

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. There are nine natural gas-fired turbines (A-07 and AUX B-04 through AUX B-11) at EPNG Window Rock. The installation of turbines AUX B-04 through AUX B-11 did not trigger the requirements of this subpart because the heat input capacity of each individual turbine is 2.3 MMBtu/hr. The installation of turbine A-07 in 1992 with a maximum heat input capacity greater than 10 MMBtu/hr did trigger the requirements of this subpart under 40 CFR § 60.330(a). Pursuant to 40 CFR Part 60, Subpart GG, EPNG Window Rock shall comply with the NOx and SO_2 emission limits below for turbine A-07:

i. Pursuant to 40 CFR § 60.332(a)(2), NOx emissions from turbine A-07 shall not exceed the following:

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

where:

STD = allowable ISO corrected (if required as given in 40 CFR § 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 peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour, and

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

Compliance with the PSD BACT limit of 6.1 lb/hr or 42 ppmvd NOx at 15% O_2 (3-hour rolling average, ISO conditions), which was established in PSD Permit AZP-90-1, issued October 25, 1991, ensures compliance with the NOx emission limit in 40 CFR § 60.332(a) for turbine A-07. This limit

is equivalent to 0.0042 percent by volume, which is less than the maximum allowable NOx emission concentration of 0.015 percent by volume.

ii. Pursuant to 40 CFR § 60.332(a)(3), EPNG has determined not to claim the NOx emission allowance for fuel-bound nitrogen in the above equation. Therefore, the F-value is equal to zero.

iii. Pursuant to 40 CFR § 60.332(k), when fired with natural gas, turbine A-07 is exempt from 40 CFR § 60.332(a)(2) when being fired with an emergency fuel.

iv. Pursuant to 40 CFR § 60.334(j)(4), each period during which an exemption provided in 40 CFR § 60.332(k) is in effect shall be included in the report required in 40 CFR § 60.7(c), which shall include the type, reasons, and duration of the firing of the emergency fuel.

v. Turbine A-07 does not use water or steam injection to control NOx emissions and was constructed after October 3, 1997 and before July 8, 2004. Under 40 CFR § 60.334(c), use of a CEMS to determine excess emissions is permitted but not required. Pursuant to 40 CFR § 60.334(c) and PSD Permit AZP 90-1, EPNG uses a CEMS to meet the requirements of 40 CFR § 60.334(b)(3) and PSD Permit AZP 90-1. Compliance with the NOx emission limit in this subpart is demonstrated by the operation of the CEMS.

vi. Pursuant to 40 CFR § 60.333(b), the total sulfur contained in the fuel combusted in any stationary gas turbine shall not exceed 0.8 percent by weight (8,000 ppmw).

vii. Pursuant to 40 CFR § 60.334(h)(3), EPNG has elected not to monitor the total sulfur content of the natural gas combusted in emission unit A-07 by using natural gas that meets the definition in 40 CFR § 60.331(u). EPNG will demonstrate compliance by submitting the gas quality characteristics excerpt from its current tariff from the Federal Energy Regulatory Commission (FERC), which specifies the fuel sulfur content to be below the 20 grains/100 scf limit.

c. 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.

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

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

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

Requirement	Condition/ Section	Condition in Part 71 Permit	Description/Notes
PSD permit AZP 90-1	I	n/a	Permit expiration (construction began and was completed on time)
	II	n/a	Notification of commencement of construction and startup (one-time only)
	III	II.B.14	Facilities operation
	IV	II.B.15	Notification of malfunction
	V	IV.M	Right to entry
	VI	II.B.16	Transfer of ownership
	VII	IV.F	Severability
	VIII	II.B.17	Other applicable regulations
	IX.A	n/a	Certification of installation of low-NOx combustor, CEMS (one-time only)
	IX.A	II.D	40 CFR 60 Subpart GG requirements
	IX.B	II.B.4	Operating low-NOx combustor
	IX.C.1.a	II.B.5	Turbine performance test (turbine A-07)
	IX.C.1.b	II.B.5	Turbine performance test (low-NOx combustor on turbine A-07)
	IX.C.2	II.B.6	Performance test methods for NOx, CO
	IX.C.2	II.B.7	30-day notification
	IX.C.3	II.B.8	Access to sampling ports
	IX.D	n/a	NOx limit for turbine A-07 before installation of low-NOx burner

	IX.D	II.B.1	NOx limit for turbine A-07 after installation of low-NOx burner
	IX.D	II.B.2	CO limit for turbine A-07
	IX.D	II.B.3	Opacity limit for turbine A-07
	IX.D	n/a	Revision of NOx and CO emission rates (time frame for revision is over)
	IX.E.1.a	II.B.9.a	Operation of CEMS for NOx, CO
	IX.E.1.b	II.B.9.b	Stack gas volumetric flow rate
	IX.E.2	n/a	Notification of CEMS installation (one-time only)
	IX.E.2	II.B.10	Alternative to CEMS
	IX.E.3	II.B.13	Excess emissions reporting
	IX.E.6	II.B.11	Maintain quality assurance for CEMS
	IX.E.7	II.B.13	Recordkeeping requirements
	IX.F	n/a	Permit amendment (condition deleted)
	X	II.B- II.D	Agency notifications
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 (facility has CEMS, but this is not required by NSPS)
	60.7(d)	n/a	Report format for CEMS reporting (facility has CEMS, but is not required by NSPS)
	60.7(e)	n/a	Reporting frequency (PSD permit requires quarterly excess emissions reports)
	60.7(f)	n/a	Maintain monitoring records (PSD permit

			requires 5 years)
	60.7(g)	n/a	Notification required by state/local agency (no such notification required)
	60.7(h)	n/a	Disclaimer that subpart may clarify or make inapplicable any general provisions
	60.8	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 (facility has CEMS, but this is not required by NSPS)
	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.1	Definitions (gaseous fuel meets the definition of natural gas in 40 CFR § 60.331(u))
	60.332	II.D.8	Standard for nitrogen oxides (NOx emissions from unit A-07 must be limited as specified in 40 CFR § 60.332(a)(2))
	60.333	II.D.1	Standard for sulfur oxides (fuel sulfur standard)
	60.334(a)	n/a	Monitoring of water/steam, fuel for NOx control (the turbine does not use water

			injection to control NOx)
	60.334(b) & (c)	II.D.5 - II.D.7	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.3	Monitoring of fuel sulfur content not required if the fuel meets definition of natural gas in 40 CFR § 60.331(u)
	60.335	II.D.7- II.D.9	Test methods and procedures
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 Window 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 first Part 71 Operating Permit for the facility was issued by US EPA on December 25, 2000 (NN-OP-00-05) and the first Administrative Amendment was issued on January 14, 2005. NNEPA issued Part 71 Operating Permit NN OP 05-009 for the facility on October 7, 2008.

All conditions from previous approvals are being incorporated into this Part 71 Permit Renewal. One monitoring requirement, which comes from 40 CFR Part 63, Subpart ZZZZ, for AUX A-01 through AUX A-03, is being removed from the Title V permit as these units have been removed from the facility. Monitoring requirements under 40 CFR Part 60, Subpart GG are being updated to reflect July 8, 2004 changes to the monitoring requirements for sulfur content in fuel. Additional periodic monitoring, pursuant to 40 CFR 71.6(a)(3)(i)(B), was added to the permit by requiring periodic performance testing of NO_X, CO, and VOC emissions for engines A-01 through A-06, and B-01through B-06 and monitoring of the microturbines NO_X and CO emissions, AUX B-04 through AUX B-11,

using portable analyzers. The monitoring requirements in this permit are summarized below in Table 7.

Table 7. Monitoring in the Title V Permit

Requirement	**Requirement Condition #**	**Monitoring in Part 71 Permit**	**Monitoring Condition #**
Performance Test for NOx, CO and VOC (A-01 through A-06, and B-01through B-06)	II.A.1.a	Test for NOx. CO, and VOC simultaneously, at least once every fifteen (15) years At least four (4) engines shall be tested during this permit term	II.A.1.a
Performance Test for VOC (A-07)	II.A.1.b	Test for NOx. CO, and VOC simultaneously, at least once every five (5) years The turbine shall be tested during this permit term	II.A.1.b
Portable analyzer check for NOx and CO (AUX B-04 through AUX B-11)	II.A.2	Monitor and record for NOx and CO simultaneously, at least once every permit term One micro turbine shall be analyzed during this permit term	II.A.2
NOx Limits (A-07)	II.B.1	NOx testing annually and as specified by NNEPA	II.B.5 & II.B.9
CO Limits (A-07)	II.B.2	CO testing annually and as specified by NNEPA	II.B.5 & II.B.9
Fuel sulfur content limit	II.D.1	FERC tariff with maximum total fuel sulfur content of natural gas	II.D.2 & II.D.3

6. Endangered Species Act

Under section 7(a)(2) of the ESA, federal agencies are required to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed, threatened, or endangered species, or destroy or adversely modify the

designated critical habitat of such species. 16 U.S.C. § 1536(a)(2). The U.S. Fish and Wildlife Service and National Marine Fisheries Service have promulgated ESA implementing regulations at 50 CFR Part 402.

The CAA title V permit program requires the NNEPA to issue a permit specifically describing the permittee's existing pollution control obligations under the CAA. A title V permit does not generally create any new substantive requirements, but rather simply incorporates all existing CAA requirements, called "applicable requirements," into a single unified operating permit applicable to a particular facility. The title V permit EPA is issuing to EPNG Window 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 insure 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 Window 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. Public Notice

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

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

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

b. Response to Comments

NNEPA did not receive any comments received on the draft Part 71 permit.

Public Notice

Public Notice

PROPOSED RENEWAL OF PART 71 PERMIT

EL PASO NATURAL GAS COMPANY

WINDOW ROCK COMPRESSOR STATION

LOCATED NEAR ST. MICHAELS, ARIZONA

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

The Window Rock Compressor Station initially began operation in 1958 with six (6) engines. The facility has then made numerous changes and now consists of one (1) natural gas-fired turbine twelve (12) natural gas-fired engines, and two (2) Capstones microturbine packages for auxiliary power. The initial Title V permit for this source was issued by the US EPA on December 25, 2000 and was renewed by NNEPA on October 7, 2008. The second Title V renewal application was received by NNEPA on April 4, 2013 and issued on September 24, 2015. The third Title V renewal application was received by NNEPA on March 30, 2020, within this renewal application the Window Rock Compressor Station did not propose any changes to their facility or operations. 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), November 17, 2022.** Written comments will be considered prior to final permit decisions.

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

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

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

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

Emission Calculations

El Paso Natural Gas
Window Rock Compressor Station
CAPs Potential to Emit (PTE)

Emission Unit ID	Site Rating			Hours of Operation	Emission Factors					Emission Rate (lb/hr)					Emissions (tpy)				
					lb/hr		lb/MMBtu												
	Hp	Btu/hp-hr	MMBtu/hr		NOx	CO	VOC	SO_2	PM_{10}	NOx	CO	VOC	SO_2	PM_{10}	NOx	CO	VOC	SO_2	PM_{10}
A01	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.06	4.8
A02	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.06	4.8
A03	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.06	4.8
A04	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.06	4.8
A05	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.06	4.8
A06	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.06	4.8
Sub-total															**1955.2**	**1293.0**	**71.9**	**0.4**	**29.0**
A07	4,530	9,338	42.3	8760	6.1	5.1	1.8 lb/hr	4.10E-03	7.92E-03	6.1	5.1	1.8	0.17	0.34	27	22	8	0.76	1.5
Sub-total															**26.7**	**22.3**	**7.9**	**0.8**	**1.5**
B01	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.1	4.8
B02	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.1	4.8
B03	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.1	4.8
B04	2,500	7,600	19.0	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	2.7	0.01	1.10	326	215	12	0.1	4.8
B05	2,700	7,593	20.5	8760	74.4	49.2	0.144	7.06E-04	5.80E-02	74.4	49.2	3.0	0.01	1.19	326	215	13	0.1	5.2
B06	2,800	7,607	21.3	8760	88.8	25.4	0.144	7.06E-04	5.80E-02	88.8	25.4	3.1	0.02	1.24	389	111	13	0.1	5.4
Sub-total					**g/hp-hr**		**lb/MMBtu**								**2,018.3**	**1,188.7**	**74.3**	**0.4**	**29.9**
AUX B04	268	8,579	2.3	8760	0.1875	0.1125	0.0375	4.25E-03	8.25E-03	0.11	0.07	0.02	0.01	0.02	0.5	0.3	0.1	0.04	0.1
AUX B05	268	8,579	2.3	8760	0.1875	0.1125	0.0375	4.25E-03	8.25E-03	0.11	0.07	0.02	0.01	0.02	0.5	0.3	0.1	0.04	0.1
AUX B06	268	8,579	2.3	8760	0.1875	0.1125	0.0375	4.25E-03	8.25E-03	0.11	0.07	0.02	0.01	0.02	0.5	0.3	0.1	0.04	0.1
AUX B07	268	8,579	2.3	8760	0.1875	0.1125	0.0375	4.25E-03	8.25E-03	0.11	0.07	0.02	0.01	0.02	0.5	0.3	0.1	0.04	0.1
AUX B08	268	8,579	2.3	8760	0.1875	0.1125	0.0375	4.25E-03	8.25E-03	0.11	0.07	0.02	0.01	0.02	0.5	0.3	0.1	0.04	0.1
AUX B09	268	8,579	2.3	8760	0.1875	0.1125	0.0375	4.25E-03	8.25E-03	0.11	0.07	0.02	0.01	0.02	0.5	0.3	0.1	0.04	0.1
AUX B10	268	8,579	2.3	8760	0.1875	0.1125	0.0375	4.25E-03	8.25E-03	0.11	0.07	0.02	0.01	0.02	0.5	0.3	0.1	0.04	0.1
AUX B11	268	8,579	2.3	8760	0.1875	0.1125	0.0375	4.25E-03	8.25E-03	0.11	0.07	0.02	0.01	0.02	0.5	0.3	0.1	0.04	0.1
															3.9	**2.3**	**0.8**	**0.3**	**0.7**
Total															**4004.1**	**2506.4**	**154.9**	**1.8**	**61.0**

Units A01 through A06 and B01 through B05 (2-stroke lean-burn reciprocating engines)

NOx: 2000 test data, max NOx = 62.0 lb/hr + 20% safety factor = 74.4 lb/hr

CO: 2000 test data, max CO= 41.0 lb/hr + 20% safety factor = 49.2 lb/hr

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

SO_2: AP-42 (7/00 version) emission factor for 2-stroke lean-burn engines + 20% safety factor

PM_{10}: AP-42 (7/00 version) emission factor for 2-stroke lean-burn engines + 20% safety factor (filterable + condensable PM)

Unit A07 (natural gas turbine)

NOx: Permit NN-OP 00-05, permitted allowable emission rate

CO: Permit NN-OP 00-05, permitted allowable emission rate

VOC: Centaur test data plus margin of safety

SO_2: AP-42 (7/00 version) emission factor for turbines + 20% safety factor

PM_{10}: AP-42 (7/00 version) emission factor for turbines + 20% safety factor

Units B06 (2-stroke lean-burn reciprocating engine)

NOx: 2000 test data, max NOx = 74.0 lb/hr + 20% safety factor = 88.8 lb/hr

CO: 2000 test data, max CO= 16.9 lb/hr + 20% safety factor = 25.4 lb/hr

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

SO_2: AP-42 (7/00 version) emission factor for 2-stroke lean-burn engines + 20% safety factor

PM_{10}: AP-42 (7/00 version) emission factor for 2-stroke lean-burn engines + 20% safety factor (filterable + condensable PM)

Units AUX B04 through AUX B11 (natural gas microturbines)

NOx: Manufacturer emission factor (0.15 g/hp-hr) + 25% safety factor

CO: Manufacturer emission factor (0.09 g/hp-hr) + 25% safety factor

VOC: Manufacturer emission factor (0.03 g/hp-hr) + 25% safety factor

SO_2: AP-42 (4/00 version) emission factor for turbines + 25% safety factor

PM_{10}: AP-42 (4/00 version) emission factor for turbines + 25% safety factor

El Paso Natural Gas
Window Rock Compressor Station
HAPs Potential to Emit (PTE)

Site Data	Unit ID					
	A01 thru A06	A07	B01 thru B04	B05	B06	AUX-B04 thru B11
hp	2,500	4,530	2,500	2,700	2,800	268.1
MMBtu/hr	19.0	42.3	19.0	20.5	21.3	2.3
Hours	8,760	8,760	8,760	8,760	8,760	8,760

Annual Emissions in tons

HAPs	A01	A02	A03	A04	A05	A06	Sub-total	A 07	B01	B02	B03	B04	B05	B06	Sub-total	AUX B04 thru AUX B11	Facility Total
1,1,2,2- Tetrachloroethane	5.52E-03	5.52E-03	5.52E-03	5.52E-03	5.52E-03	5.52E-03	3.31E-02		5.52E-03	5.52E-03	5.52E-03	5.52E-03	5.95E-03	6.19E-03	3.42E-02		6.73E-02
1,1,2-Trichloroethane	4.39E-03	4.39E-03	4.39E-03	4.39E-03	4.39E-03	4.39E-03	2.63E-02		4.39E-03	4.39E-03	4.39E-03	4.39E-03	4.73E-03	4.92E-03	2.72E-02		5.35E-02
1,3-Butadiene	6.82E-02	6.82E-02	6.82E-02	6.82E-02	6.82E-02	6.82E-02	4.09E-01	7.97E-05	6.82E-02	6.82E-02	6.82E-02	6.82E-02	7.36E-02	7.65E-02	4.23E-01	3.47E-05	8.33E-01
1,3-Dichloropropane	3.65E-03	3.65E-03	3.65E-03	3.65E-03	3.65E-03	3.65E-03	2.19E-02		3.65E-03	3.65E-03	3.65E-03	3.65E-03	3.93E-03	4.09E-03	2.26E-02		4.45E-02
2,2,4-Trimethylpentane	7.04E-02	7.04E-02	7.04E-02	7.04E-02	7.04E-02	7.04E-02	4.22E-01		7.04E-02	7.04E-02	7.04E-02	7.04E-02	7.60E-02	7.89E-02	4.37E-01		8.59E-01
2-Methylnaphthalene	1.78E-03	1.78E-03	1.78E-03	1.78E-03	1.78E-03	1.78E-03	1.07E-02		1.78E-03	1.78E-03	1.78E-03	1.78E-03	1.92E-03	2.00E-03	1.10E-02		2.17E-02
Acenaphthene	1.11E-04	1.11E-04	1.11E-04	1.11E-04	1.11E-04	1.11E-04	6.64E-04		1.11E-04	1.11E-04	1.11E-04	1.11E-04	1.19E-04	1.24E-04	6.86E-04		1.35E-03
Acenaphthylene	2.64E-04	2.64E-04	2.64E-04	2.64E-04	2.64E-04	2.64E-04	1.58E-03		2.64E-04	2.64E-04	2.64E-04	2.64E-04	2.85E-04	2.96E-04	1.64E-03		3.22E-03
Acetaldehyde	6.46E-01	6.46E-01	6.46E-01	6.46E-01	6.46E-01	6.46E-01	3.87E+00	7.41E-03	6.46E-01	6.46E-01	6.46E-01	6.46E-01	6.97E-01	7.24E-01	4.00E+00	3.22E-03	7.89E+00
Acrolein	6.47E-01	6.47E-01	6.47E-01	6.47E-01	6.47E-01	6.47E-01	3.88E+00	1.19E-03	6.47E-01	6.47E-01	6.47E-01	6.47E-01	6.99E-01	7.26E-01	4.01E+00	5.16E-04	7.90E+00
Anthracene	5.98E-05	5.98E-05	5.98E-05	5.98E-05	5.98E-05	5.98E-05	3.59E-04		5.98E-05	5.98E-05	5.98E-05	5.98E-05	6.45E-05	6.70E-05	3.70E-04		7.29E-04
Benz(a)anthracene	2.80E-05	2.80E-05	2.80E-05	2.80E-05	2.80E-05	2.80E-05	1.68E-04		2.80E-05	2.80E-05	2.80E-05	2.80E-05	3.02E-05	3.13E-05	1.73E-04		3.41E-04
Benzene	1.61E-01	1.61E-01	1.61E-01	1.61E-01	1.61E-01	1.61E-01	9.69E-01	2.22E-03	1.61E-01	1.61E-01	1.61E-01	1.61E-01	1.74E-01	1.81E-01	1.00E+00	9.67E-04	1.97E+00
Benzo(a)pyrene	4.73E-07	4.73E-07	4.73E-07	4.73E-07	4.73E-07	4.73E-07	2.84E-06		4.73E-07	4.73E-07	4.73E-07	4.73E-07	5.10E-07	5.30E-07	2.93E-06		5.77E-06
Benzo(b)fluoranthene	7.08E-07	7.08E-07	7.08E-07	7.08E-07	7.08E-07	7.08E-07	4.25E-06		7.08E-07	7.08E-07	7.08E-07	7.08E-07	7.64E-07	7.94E-07	4.39E-06		8.64E-06
Benzo(e)pyrene	1.95E-06	1.95E-06	1.95E-06	1.95E-06	1.95E-06	1.95E-06	1.17E-05		1.95E-06	1.95E-06	1.95E-06	1.95E-06	2.10E-06	2.18E-06	1.21E-05		2.38E-05
Benzo(g,h,i)perylene	2.06E-06	2.06E-06	2.06E-06	2.06E-06	2.06E-06	2.06E-06	1.24E-05		2.06E-06	2.06E-06	2.06E-06	2.06E-06	2.23E-06	2.31E-06	1.28E-05		2.52E-05
Benzo(k)fluoranthene	3.55E-07	3.55E-07	3.55E-07	3.55E-07	3.55E-07	3.55E-07	2.13E-06		3.55E-07	3.55E-07	3.55E-07	3.55E-07	3.83E-07	3.97E-07	2.20E-06		4.33E-06
Biphenyl	3.29E-04	3.29E-04	3.29E-04	3.29E-04	3.29E-04	3.29E-04	1.97E-03		3.29E-04	3.29E-04	3.29E-04	3.29E-04	3.55E-04	3.69E-04	2.04E-03		4.01E-03
Carbon Tetrachloride	5.05E-03	5.05E-03	5.05E-03	5.05E-03	5.05E-03	5.05E-03	3.03E-02		5.05E-03	5.05E-03	5.05E-03	5.05E-03	5.45E-03	5.66E-03	3.13E-02		6.16E-02
Chlorobenzene	3.69E-03	3.69E-03	3.69E-03	3.69E-03	3.69E-03	3.69E-03	2.22E-02		3.69E-03	3.69E-03	3.69E-03	3.69E-03	3.99E-03	4.14E-03	2.29E-02		4.51E-02
Chloroform	3.92E-03	3.92E-03	3.92E-03	3.92E-03	3.92E-03	3.92E-03	2.35E-02		3.92E-03	3.92E-03	3.92E-03	3.92E-03	4.23E-03	4.39E-03	2.43E-02		4.78E-02
Chrysene	5.59E-05	5.59E-05	5.59E-05	5.59E-05	5.59E-05	5.59E-05	3.36E-04		5.59E-05	5.59E-05	5.59E-05	5.59E-05	6.03E-05	6.27E-05	3.47E-04		6.82E-04
Ethylbenzene	8.99E-03	8.99E-03	8.99E-03	8.99E-03	8.99E-03	8.99E-03	5.39E-02	5.93E-03	8.99E-03	8.99E-03	8.99E-03	8.99E-03	9.70E-03	1.01E-02	5.57E-02	2.58E-03	1.18E-01
Ethylene Dibromide	6.11E-03	6.11E-03	6.11E-03	6.11E-03	6.11E-03	6.11E-03	3.67E-02		6.11E-03	6.11E-03	6.11E-03	6.11E-03	6.59E-03	6.85E-03	3.79E-02		7.45E-02
Fluoranthene	3.00E-05	3.00E-05	3.00E-05	3.00E-05	3.00E-05	3.00E-05	1.80E-04		3.00E-05	3.00E-05	3.00E-05	3.00E-05	3.24E-05	3.37E-05	1.86E-04		3.67E-04
Fluorene	1.41E-04	1.41E-04	1.41E-04	1.41E-04	1.41E-04	1.41E-04	8.44E-04		1.41E-04	1.41E-04	1.41E-04	1.41E-04	1.52E-04	1.58E-04	8.72E-04		1.72E-03
Formaldehyde	4.59E+00	4.59E+00	4.59E+00	4.59E+00	4.59E+00	4.59E+00	2.76E+01	1.32E-01	4.59E+00	4.59E+00	4.59E+00	4.59E+00	4.96E+00	5.15E+00	2.85E+01	5.72E-02	5.62E+01
Indeno(1,2,3-c,d)pyrene	8.26E-07	8.26E-07	8.26E-07	8.26E-07	8.26E-07	8.26E-07	4.96E-06		8.26E-07	8.26E-07	8.26E-07	8.26E-07	8.92E-07	9.26E-07	5.12E-06		1.01E-05
Methanol	2.06E-01	2.06E-01	2.06E-01	2.06E-01	2.06E-01	2.06E-01	1.24E+00		2.06E-01	2.06E-01	2.06E-01	2.06E-01	2.23E-01	2.31E-01	1.28E+00		2.52E+00
Methylene Chloride	1.22E-02	1.22E-02	1.22E-02	1.22E-02	1.22E-02	1.22E-02	7.34E-02		1.22E-02	1.22E-02	1.22E-02	1.22E-02	1.32E-02	1.37E-02	7.58E-02		1.49E-01
n-Hexane	3.70E-02	3.70E-02	3.70E-02	3.70E-02	3.70E-02	3.70E-02	2.22E-01		3.70E-02	3.70E-02	3.70E-02	3.70E-02	4.00E-02	4.15E-02	2.30E-01		4.52E-01
Napthalene	8.01E-03	8.01E-03	8.01E-03	8.01E-03	8.01E-03	8.01E-03	4.81E-02	2.41E-04	8.01E-03	8.01E-03	8.01E-03	8.01E-03	8.65E-03	8.98E-03	4.97E-02	1.05E-04	9.81E-02
PAH	1.12E-02	1.12E-02	1.12E-02	1.12E-02	1.12E-02	1.12E-02	6.69E-02	4.08E-04	1.12E-02	1.12E-02	1.12E-02	1.12E-02	1.20E-02	1.25E-02	6.91E-02	1.77E-04	1.37E-01
Perylene	4.14E-07	4.14E-07	4.14E-07	4.14E-07	4.14E-07	4.14E-07	2.48E-06		4.14E-07	4.14E-07	4.14E-07	4.14E-07	4.46E-07	4.64E-07	2.56E-06		5.05E-06
Phenanthrene	2.94E-04	2.94E-04	2.94E-04	2.94E-04	2.94E-04	2.94E-04	1.76E-03		2.94E-04	2.94E-04	2.94E-04	2.94E-04	3.17E-04	3.29E-04	1.82E-03		3.58E-03
Phenol	3.50E-03	3.50E-03	3.50E-03	3.50E-03	3.50E-03	3.50E-03	2.10E-02		3.50E-03	3.50E-03	3.50E-03	3.50E-03	3.78E-03	3.93E-03	2.17E-02		4.27E-02
Propylene Oxide								5.37E-03								2.34E-03	7.71E-03
Pyrene	4.86E-05	4.86E-05	4.86E-05	4.86E-05	4.86E-05	4.86E-05	2.92E-04		4.86E-05	4.86E-05	4.86E-05	4.86E-05	5.24E-05	5.45E-05	3.01E-04		5.93E-04
Styrene	4.56E-03	4.56E-03	4.56E-03	4.56E-03	4.56E-03	4.56E-03	2.74E-02		4.56E-03	4.56E-03	4.56E-03	4.56E-03	4.92E-03	5.11E-03	2.83E-02		5.56E-02
Toulene	8.01E-02	8.01E-02	8.01E-02	8.01E-02	8.01E-02	8.01E-02	4.81E-01	2.41E-02	8.01E-02	8.01E-02	8.01E-02	8.01E-02	8.65E-02	8.98E-02	4.97E-01	1.05E-02	1.01E+00
Vinyl Chloride	2.06E-03	2.06E-03	2.06E-03	2.06E-03	2.06E-03	2.06E-03	1.23E-02		2.06E-03	2.06E-03	2.06E-03	2.06E-03	2.22E-03	2.30E-03	1.27E-02		2.51E-02
Xylene	2.23E-02	2.23E-02	2.23E-02	2.23E-02	2.23E-02	2.23E-02	1.34E-01	1.19E-02	2.23E-02	2.23E-02	2.23E-02	2.23E-02	2.41E-02	2.50E-02	1.38E-01	5.16E-03	2.89E-01
Total	6.6	6.6	6.6	6.6	6.6	6.6	**39.7**	**0.2**	6.6	6.6	6.6	6.6	7.1	7.4	**41.0**	**0.1**	**81.0**

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

El Paso Natural Gas
Window Rock Compressor Station
Emission Factors Basis

Units A01 thru A06 and B01 thru B06 are 2-stroke lean-burn reciprocating engines
Emission Factors from AP-42, Section 3.2, Table 3.2-1 (Version 7/00)

HAP	Emission Factor (lb/MMBtu)
1,1,2,2- Tetrachloroethane	6.63E-05
1,1,2-Trichloroethane	5.27E-05
1,3-Butadiene	8.20E-04
1,3-Dichloropropane	4.38E-05
2,2,4-Trimethylpentane	8.46E-04
2-Methylnaphthalene	2.14E-05
Acenaphthene	1.33E-06
Acenaphthylene	3.17E-06
Acetaldehyde	7.76E-03
Acrolein	7.78E-03
Anthracene	7.18E-07
Benz(a)anthracene	3.36E-07
Benzene	1.94E-03
Benzo(a)pyrene	5.68E-09
Benzo(b)fluoranthene	8.51E-09
Benzo(e)pyrene	2.34E-08
Benzo(g,h,i)perylene	2.48E-08
Benzo(k)fluoranthene	4.26E-09
Biphenyl	3.95E-06
Carbon Tetrachloride	6.07E-05
Chlorobenzene	4.44E-05
Chloroform	4.71E-05
Chrysene	6.72E-07
Ethylbenzene	1.08E-04
Ethylene Dibromide	7.34E-05
Fluoranthene	3.61E-07
Fluorene	1.69E-06
Formaldehyde	5.52E-02
Indeno(1,2,3-c,d)pyrene	9.93E-09
Methanol	2.48E-03
Methylene Chloride	1.47E-04
n-Hexane	4.45E-04
Napthalene	9.63E-05
PAH	1.34E-04
Perylene	4.97E-09
Phenanthrene	3.53E-06
Phenol	4.21E-05
Pyrene	5.84E-07
Styrene	5.48E-05
Toulene	9.63E-04
Vinyl Chloride	2.47E-05
Xylene	2.68E-04

Units A-07, and AUX B-04 through AUX B11 are natural gas turbines
Emission Factors from AP-42, Section 3.1, Table 3.1-3 (Version 4/00)

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

El Paso Natural Gas
Window Rock Compressor Station
GHG Potential to Emit (PTE)

Emission Unit ID	Site Rating			Hours of Operation	Emission Factors (kg/MMBtu)			Global Warming Potentials		Emission Rate (lb/hr)				Emissions (tpy)			
	Hp	Btu/hp-hr	MMBtu/hr		CO_2	CH_4	N_2O	CH_4	N_2O	CO_2	CH_4	N_2O	CO_2e	CO_2	CH_4	N_2O	CO_2e
A01	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2223	9,727	0.18	0.018	9,737
A02	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2223	9,727	0.18	0.018	9,737
A03	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2223	9,727	0.18	0.018	9,737
A04	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2223	9,727	0.18	0.018	9,737
A05	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2223	9,727	0.18	0.018	9,737
A06	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2223	9,727	0.18	0.018	9,737
Sub-total														**58,365.0**	**1.1**	**0.11**	**58,422.2**
A07	4,530	9,338	42.3	8760	53.02	1.00E-03	1.00E-04	21	310	4,945	0.09	0.009	4,949	21,657	0.41	0.041	21,678
Sub-total														**21,657.1**	**0.4**	**0.04**	**21,678.3**
B01	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2,223	9,727	0.18	0.018	9,737
B02	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2,223	9,727	0.18	0.018	9,737
B03	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2,223	9,727	0.18	0.018	9,737
B04	2500	7,600	19.0	8760	53.02	1.00E-03	1.00E-04	21	310	2,221	0.04	0.004	2,223	9,727	0.18	0.018	9,737
B05	2,700	7,600	20.5	8760	53.02	1.00E-03	1.00E-04	21	310	2,399	0.05	0.005	2,401	10,506	0.20	0.020	10,516
B06	2,800	7,600	21.3	8760	53.02	1.00E-03	1.00E-04	21	310	2,487	0.05	0.005	2,490	10,895	0.21	0.021	10,905
Sub-total														**60,310.5**	**1.1**	**0.11**	**60,369.6**
AUX B04	268.1	8,503	2.3	8760	53.02	1.00E-03	1.00E-04	21	310	266	0.01	0.001	267	1,167	0.02	0.002	1,168
AUX B05	268.1	8,503	2.3	8760	53.02	1.00E-03	1.00E-04	21	310	266	0.01	0.001	267	1,167	0.02	0.002	1,168
AUX B06	268.1	8,503	2.3	8760	53.02	1.00E-03	1.00E-04	21	310	266	0.01	0.001	267	1,167	0.02	0.002	1,168
AUX B07	268.1	8,503	2.3	8760	53.02	1.00E-03	1.00E-04	21	310	266	0.01	0.001	267	1,167	0.02	0.002	1,168
AUX B08	268.1	8,503	2.3	8760	53.02	1.00E-03	1.00E-04	21	310	266	0.01	0.001	267	1,167	0.02	0.002	1,168
AUX B09	268.1	8,503	2.3	8760	53.02	1.00E-03	1.00E-04	21	310	266	0.01	0.001	267	1,167	0.02	0.002	1,168
AUX B10	268.1	8,503	2.3	8760	53.02	1.00E-03	1.00E-04	21	310	266	0.01	0.001	267	1,167	0.02	0.002	1,168
AUX B11	268.1	8,503	2.3	8760	53.02	1.00E-03	1.00E-04	21	310	266	0.01	0.001	267	1,167	0.02	0.002	1,168
Sub-total														**9,337.0**	**0.2**	**0.02**	**9,346.1**
Total														**149,669.5**	**2.8**	**0.3**	**149,816.3**

1 kg = 2.20462 lbs

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 from IPCC's Second Assessment Report (SAR, 1996)

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)