Navajo Nation Environmental Protection Agency
Navajo Nation Operating Permit Program

Transwestern Pipeline Company, LLC (TWP)
Leupp Compressor Station Number 3

Permit No: NN OP 18-001

2018

THE NAVAJO NATION

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TITLE V PERMIT TO OPERATE

PERMIT #:	FACILITY NAME:	LOCATION:	COUNTY:	STATE:
NN OP 18-001	TRANSWESTERN PIPELINE COMPANY, LLC-LEUPP COMPRESSOR STATION NUMBER 3	LEUPP	COCONINO	AZ

ISSUE DATE:	EXPIRATION DATE:	AFS PLANT ID:	PERMITTING AUTHORITY:
XX/XX/2018	XX/XX/2018	04-005-N0137	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
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
TWP	Transwestern Pipeline Company, LLC
US EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

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I. Source Identification

- Parent Company Name: Energy Transfer Partners
- Parent Company Address: 800 East Sonterra Blvd
  San Antonio, TX 78285
- Plant Operator : Transwestern Pipeline Company, LLC (TWP)
- Plant Operator Address: 6381 North Main
  Roswell, NM 88201
- Plant Name: Leupp Compressor Station Number 3
- Plant Location: Section 5/6, Township 22-N,
  Range 14-E, 6 miles East of Leupp, Arizona
- County: Coconino, Arizona
- EPA Region: IX
- Reservation: Navajo Nation
- Company Contact: Larry Campbell Phone: (575) 625-8022
- Responsible Official: David Roybal Phone: (618) 543-7546
- EPA Contact: Lisa Beckham Phone: (415) 972-3811
- Tribal Contact: Tennille Denetdeel Phone: (928) 729-4248
- SIC Code: 4922
- AFS Plant ID 04-005-N0137
- Description of Process: The facility is a natural gas compressor station that performs gas inlet filtration and natural gas compression.
- Significant Emission Units:

Unit ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
304	One (1) natural gas-fired turbine compressor	390.2 MMBtu/hr 33,915 hp	2002	N/A
323	One (1) natural gas-fired RICE*, for power generation	4.47 MMBtu/hr 526 hp	2002	N/A
324	One (1) natural gas-fired RICE*, for power generation	4.47 MMBtu/hr 526 hp	2002	N/A

*RICE – Reciprocating Internal Combustion Engine

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II. Requirements for Specific Units

II.A. Emission Limits

1. NOx emissions from the gas turbine (Unit 304) shall not exceed 32.32 lbs/hr, based on a three-hour average, except during periods of startup and shutdown. [40 CFR §§ 71.6(a)(13)(iii), 71.6(b), 71.7(e)(1)(i)(A)(4)(i), 60.332(a)]

2. CO emissions from the gas turbine (Unit 304) shall not exceed 19.67 lbs/hr, based on a three-hour average, except during periods of startup and shutdown. [40 CFR §§ 71.6(a)(13)(iii), 71.6(b), 71.7(e)(1)(i)(A)(4)(i)]

Work Practice and Operational Requirements

3. The permittee shall not operate Emission Units 323 and 324 (Caterpillar generator engines) simultaneously, except during startup/shutdown transition from one generator unit to other generator unit to maintain process power. There shall be no more than 48 transition cycles in a year and the total overlap period of all the transitions combined shall not be more than 240 hours in a year. [40 CFR §§ 71.6(a)(13)(iii), 71.6(b), 71.7(e)(1)(i)(A)(4)(i)]

4. The combined hours of operation of Units 323 and 324 (Caterpillar generator engines) shall not exceed 9,000 hours in any year, and 9,024 hours in a leap year. [40 CFR §§ 71.6(a)(13)(iii), 71.6(b), 71.7(e)(1)(i)(A)(4)(i)]

Monitoring and Testing Requirements [40 CFR § 71.6(a)(3)(i)] [NNOPR § 302(E)] [The NNOPR provision is enforceable by NNEPA only.]

5. The Permittee shall conduct, on an annual basis, a performance test (as described in 40 CFR § 60.8) for NOx and CO from the gas turbine (Unit 304) at the maximum operating capacity of the unit being tested, and furnish US EPA Region IX and NNEPA a written report of the test results. The tests for NOx and CO shall be conducted on an annual basis and at the maximum operating capacity of the unit being tested. Upon written request from the Permittee, US EPA Region IX and NNEPA may approve conducting performance tests at a lower specified production rate.

   Performance tests for CO and NOx emissions shall be conducted, and the results reported, in accordance with the test methods set forth in 40 CFR § 60.8 and Appendix A. The following test methods, or alternatives approved by US EPA Region IX and NNEPA, shall be used:

   a. For CO, US EPA Methods 1-4 and 10.

   b. For NOx, US EPA Methods 1-4 and 20.

   [40 CFR §§ 60.8, 60.11(a), 60.335(b), 71.6(a)(3)(B)]

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Recordkeeping Requirements [40 CFR § 71.6(2)(3)(ii)]

6. The Permittee shall maintain an on-site log of the operation of Units 323 and 324 (Caterpillar generator engines). The log shall contain the dates, times, and duration of each startup and shutdown of each emission unit. The Permittee shall also calculate, on a monthly basis, the combined hours of operation of each engine to ensure that the facility does not exceed 9,000 hours on a yearly basis, or 9,024 hours in a leap year.

7. 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 5 years following the date of such measurements, maintenance, reports, and records. [40 CFR §§ 71.6(a)(3)(ii), 60.7(f)]

Reporting Requirements [40 CFR § 71.6(a)(3)(iii)]

8. For the purpose of reports required under 40 CFR §60.7(c), periods of excess emissions that shall be reported are defined as any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 20.0 grains/100 scf. [40 CFR § 60.334(h)(3)(ii)]

II.B. NSPS General Provisions

The following requirements apply to gas turbine Unit 304 in accordance with 40 CFR Part 60, Subpart A ("General Provisions"):

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

   Manager, Air & Tri-Section ENF-2-1
   US EPA Region IX
   Enforcement Division
   75 Hawthorne Street
   San Francisco, CA 94105-3901

2. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of TWP Leupp; 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)]

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3. The availability to the public of information provided to, or otherwise obtained by, the US EPA Administrator under this permit shall be governed by 40 CFR Part 2. (Information submitted voluntarily to the US EPA Administrator for the purposes of 40 CFR §§ 60.5 and 60.6 is governed by 40 CFR §§ 2.201 through 2.213 and not by 40 CFR § 2.301). [40 CFR § 60.9]

4. Compliance with standards in 40 CFR Part 60, other than opacity standards, shall be determined in accordance with performance tests established by 40 CFR § 60.8, unless otherwise specified in the applicable standard. Compliance with the fuel sulfur standard listed in Condition II.C.1 of this permit shall be determined in accordance with performance tests established by 40 CFR § 60.8 or with Condition II.C.4 of this permit. [40 CFR § 60.11(a)]

5. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate TWP Leupp, 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 TWP Leupp or any physical or operational change to TWP Leupp which may increase the emission rate of any

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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.C. NSPS for Stationary Gas Turbines

The following requirements apply to turbine Unit 304 in accordance with 40 CFR Part 60, Subpart GG ("Standards of Performance for Stationary Gas Turbines"). Compliance with these terms and conditions also demonstrates compliance with Permit Modification Requirements:

1. The permittee shall not burn any gaseous fuel in gas turbine Unit 304 which contains a maximum total sulfur content exceeding 20.0 grains/100 scf. [40 CFR § 60.331(u)]

2. Gas turbine Unit 304 is exempt from the NOx standard in 40 CFR 60.332(a)(2) when being fired with an emergency fuel. For the purpose of this requirement, the term "emergency fuel" means a "fuel fired by a gas turbine only during circumstances, such as natural gas supply curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the gas turbine." [40 CFR 60.332(k), 40 CFR 60.331(r)]

3. The permittee has elected not to monitor the total sulfur content of the gaseous fuel combusted in gas turbine Unit 304 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 Unit 304 satisfies the definition of "natural gas" in 40 CFR § 60.331(u). [40 CFR § 60.334(h)(3)]

II.D. NESHAP General Provisions

The following requirements apply to gas-fired power generators Units 323 and 324 in accordance with 40 CFR Part 63, Subpart A ("General Provisions"):

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

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

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extension of compliance can be granted by the Administrator under this part.

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

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

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

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

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

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

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

II.E. NESHAP for Stationary Reciprocating Internal Combustion Engines

The following requirements apply to gas-fired power generators Units 323 and 324 in accordance with 40 CFR Part 63, Subpart ZZZZ ("National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"):

Work Practice and Operational Requirements

1. The permittee shall meet the following requirements for the stationary compression-ignition RICE (Units 323 and 324) at all times, except during

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periods of startup [40 CFR Part 63, Subpart ZZZZ, Table 2d.8; 40 CFR § 63.6603]:

a. The permittee shall change the oil and filter every 2,160 hours of operation or annually, whichever comes first.

b. The permittee shall inspect air spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

c. The permittee shall inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

2. The permittee must operate and maintain Units 323 and 324, including associated monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR § 63.6605(b)]

3. The permittee must operate and maintain Units 323 and 324 according to the manufacturer's emission-related written instructions or develop its own maintenance plan which must, to the extent practicable, provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions. [40 CFR § 63.6625(e)]

4. The permittee must minimize the time Units 323 and 324 spends at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR § 63.6625(h)]

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

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must change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR § 63.6625(j)]

6. The permittee must comply with one of the following options [40 CFR Part 63, Subpart ZZZZ, Table 6.9(a)]:

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

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

Monitoring, Installation, Operation, and Maintenance Requirements

7. The permittee must demonstrate continuous compliance with each operating limitation in Table 2d that applies to the facility according to the methods specified in Table 6 of Subpart ZZZZ. [40 CFR § 63.6640(a)]

Reporting Requirements

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

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

10. The permittee must report all deviations as defined in 40 CFR Part 63, Subpart ZZZZ in the semi-annual monitoring report required by 40 CFR § 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 7 of Subpart ZZZZ along with, or as part of, the semi-annual monitoring report required by 40 CFR § 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring

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report. However, submission of a compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the NNEPA. [40 CFR § 63.6650(f)]

Recordkeeping Requirements

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

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

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

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

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

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

12. The permittee must keep records of the maintenance conducted on Units 323 and 324 in order to demonstrate that Units 323 and 324 were operated and maintained according to the maintenance plan. [40 CFR § 63.6655(e)]

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

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

1. For applicable requirements with which TWP Leupp is in compliance, TWP Leupp will continue to comply with such requirements.

2. For applicable requirements that will become effective during the permit term, TWP Leupp 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

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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

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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.G. 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 TWP Leupp that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions) and are not Title I modifications. This class of changes does not include:

   a. Changes that would violate any applicable requirements; or

   b. Changes that would contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements. [40 CFR § 71.2] [NNOPR § 102(54)]

2. The permittee is required to send written notice to NNEPA and US EPA Region IX at least 7 days in advance of any change made under this provision. The notice must describe the change, when the change will occur, any change in emissions, and identify any permit terms or conditions made inapplicable as a result of the change. The permittee shall attach each notice to its copy of this permit.

3. Any permit shield provided in this permit does not apply to changes made under this subsection.

III. Facility-Wide or Generic Permit Requirements

Conditions in this section of the permit apply to all emissions units located at the facility.

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

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

1. Submit to NNEPA and US EPA Region IX a source test plan 30 days prior to any required testing. The source test plan shall include and address the following elements:

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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.

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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.

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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

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include the total time when such monitoring was not performed during the reporting period and, at the permittee's discretion, either the total duration of deviations indicated by such monitoring or the actual records of deviations.

viii. All other monitoring results, data, or analyses required to be reported by the applicable requirement.

ix. The name, title, and signature of the responsible official who is certifying to the truth, accuracy, and completeness of the report.

b. Any report required by an applicable requirement that provides the same information described in 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:

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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 r9.aeo@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.

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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.

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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 July 21 of each year.

   b. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the Navajo Nation Environmental Protection Agency.

   c. The permittee shall send the fee payment and a completed fee filing form to:

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

2. The permittee shall submit a fee calculation worksheet form with the annual permit fee by July 21 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

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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).

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7. When notified by NNEPA of underpayment of fees, the permittee shall remit full payment within 30 days of receipt of notification.

8. A permittee who thinks an NNEPA assessed fee is in error and wishes to challenge such fee shall provide a written explanation of the alleged error to NNEPA along with full payment of the NNEPA assessed fee. NNEPA shall, within 90 days of receipt of the correspondence, review the data to determine whether the assessed fee was in error. If an error was made, the overpayment shall be credited to the account of the permittee.

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

1. The permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance, including, but not limited to, violation of any applicable requirement; any permit term or condition; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any regulation or order issued by the permitting authority pursuant to Part 71 constitutes a violation of the federal CAA and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [40 CFR §§ 71.6(a)(6)]

2. Determinations of deviations, continuous or intermittent compliance status, or violations of this permit are not limited to the applicable testing or monitoring methods required by the underlying regulations or this permit. Other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered in such determinations. [CAA §§ 113(a) and (e)(1), 40 CFR §§ 51.212, 52.12, 52.33, 60.11(g)]

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

1. The permittee shall submit to NNEPA and US EPA Region IX a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by January 30 and covering the previous calendar year. The compliance certification shall be certified as to truth, accuracy, and completeness by the permit-designated responsible official consistent with Section IV.E. of this permit and 40 CFR § 71.5(d) [40 CFR § 71.6(c)(5)]

2. The permittee shall submit to NNEPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by July 30 of each year and covering the previous six months. The compliance certification shall be certified as to truth, accuracy, and completeness

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by the permit-designated responsible official consistent with Section IV.E. of this permit. This condition is enforceable by NNEPA only. [NNOPR § 302(I)].

3. The certification shall include the following:

   a. Identification of each permit term or condition that is the basis of the certification.

   b. Identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period.

   c. The compliance status of each term and condition of the permit for the period covered by the certification based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification.

   d. A statement whether compliance with each permit term was continuous or intermittent.

   e. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with CAA § 113(c)(2), which prohibits knowingly making a false certification or omitting material information.

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

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

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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 Permit Renewal and Modification Applications:

Permits Office Chief, Air-3
US EPA Region IX
Air Division
75 Hawthorne Street
San Francisco, CA 94105-3901

For All Other Submissions:

Manager, Air & Tri-Section ENF-2-1
US EPA Region IX
Enforcement 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

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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.

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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

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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.

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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

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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:

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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.

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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.

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THE NAVAJO NATION

RUSSELL BEGAYE PRESIDENT
JONATHAN NEZ VICE PRESIDENT

Navajo Nation Environmental Protection Agency –Air Quality Control/Operating Permit Program
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Detailed Information
Permitting Authority: Navajo Nation Environmental Protection Agency

County: Coconino **State:** Arizona **AFS Plant ID:** 04-005-N0137

Facility: Transwestern Pipeline Company, LLC – Leupp Compressor Station Number 3
Document Type: STATEMENT OF BASIS

Part 71 Federal Operating Permit
Statement of Basis
Transwestern Pipeline Company, LLC
Leupp Compressor Station Number 3
Permit No. NN OP 18-001

1. Facility Information

a. Permittee

Transwestern Pipeline Company, LLC
6381 North Main
Roswell, NM 88201

b. Facility Location

Section 5/6, Township 22-N, Range 14-E
8 miles East of Leupp, Arizona in Coconino County, AZ

c. Contact Information

Facility Contact: Larry Campbell, Environmental Representative
Phone: (575) 625-8022

Responsible Official: David Roybal, Director of Operations
Phone: (618) 543-7546

d. Description of Operations, Products:

The facility is a natural gas compressor station that performs gas inlet filtration and natural gas compression and transmission.

e. Permitting and/or Construction History

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This plant was initially constructed in 1967 to provide gas compression for a natural gas pipeline. In 2002, Transwestern Pipeline Company, LLC ("TWP") replaced three engine-driven gas compressors with a new natural gas-fired turbine (Unit 304), and two power generator engines (Units 323 and 324) at the Leupp Compressor Station Number 3 ("Leupp") . US EPA issued a significant modification on November 20, 2001 to install the new turbine and the power generators. The modification required that Units 323 and 324 not operate simultaneously, except during startup/shutdown transition from one generator unit to the other and that there be no more than 24 transition cycles in any twelve month period with each transition not lasting more than 5 minutes. Also, the total combined hours of operation for Units 323 and 324 were limited to 8760 hours in any 12 month period and 8784 hours in 12 months period with leap year cycle.

In the Part 71 renewal application submitted on November 17, 2009, the permittee requested an increase in the operating hours for the two generator engines combined, from 8,760 to 9,000 hours in any 12-month period, to allow for instances where both engines run simultaneously during the engine start-up sequence and during brief periods of maintenance. The increase in operating hours was approved in the October 12, 2010 Part 71 renewal permit, in consultation with US EPA, because the action did not trigger the Prevention of Significant Deterioration (PSD) permitting program at 40 CFR § 52.21 PSD (or any other CAA applicable requirements).

The source did not trigger review under the PSD permitting program at the time because the operating hours limit was not taken to avoid PSD, and thus was not considered a relaxation that could possibly trigger PSD under 40 C.F.R. § 52.21(r)(4). Furthermore, the potential emissions increase associated with the hours increase did not trigger PSD because prior to this modification the source was not an existing major stationary source and the emission increases did not constitute a new major stationary source in and of itself.

In their current Part 71 renewal application, the permittee is requesting to increase the number of transition cycles from 24 to 48 in a calendar year with the total overlap period of all the transitions to last no more than 240 hours per year. The permittee is requesting this change due to longer maintenance times that are currently being required on Units 323 and 324 and the amount of time it takes to take down one unit and bring another unit up to normal temperature and operational efficiency to ensure a consistent supply of electricity for the entire facility. The requested change does not result in any emission increase as the total operating hours of the two generators would still be limited to 9,000 hours per year and 9,024 hours every leap year. The renewal permit consequently contains the requested change.

f. <u>Permitted Emission Units and Control Equipment</u>

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

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Table 1. List of Emission Units

Unit ID/ Stack ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
304	One (1) natural gas-fired turbine compressor	390.20 MMBtu/hr 33,915 hp	2002	N/A
323	One (1) natural gas-fired RICE*, for power generation	4.47 MMBtu/hr 526 hp	2002	N/A
324	One (1) natural gas-fired RICE*, for power generation	4.47 MMBtu/hr 526 hp	2002	N/A

*RICE – Reciprocating Internal Combustion Engine

g. <u>Insignificant Emissions</u>

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

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

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

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

iv. Fire pump and air compressor engine emissions.

v. Emissions released from any emission unit, operation, or activity that handles or stores a VOC or HAP organic liquid with a vapor pressure less than 1.5 psia.

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

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Table 2. List of Storage Tanks

Unit ID	Unit Description
T-1	25 gal Propane Tank (Pressurized)
T-2	440 bbl Vertical Oily Waste Water Tank
T-3	210 bbl Vertical Oily Waste Water Tank
T-4	500 bbl Vertical Pipeline Liquids Tank
T-5	100 bbl Vertical Used Oil Tank
T-6	5,250 gal Horizontal Lube Oil Tank
T-7	5,250 gal Horizontal Lube Oil Tank
T-8	5,148 gal Horizontal Gear Oil/Glycol Tank
T-9	400 bbl Vertical Wash Rack Water Tank

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 TWP Leupp to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of fuel combusted, stored, or processed, must be treated as part of its design if the limitation is enforceable by US EPA. PTE is meant to be a worst-case emissions calculation and is used in many cases, though not all, to determine the applicability of federal requirements. Actual emissions may be much lower than PTE. The potentials to emit are presented in Tables 3 and 4 below.

Table 3. Potential to Emit of Criteria Air Pollutants

Emission Unit	Regulated Air Pollutants in tons per year (tpy)					
	PM_{10}	SO_2	NOx	VOC	CO	Total HAPs
304	11.28	5.81	141.6	3.59	86.2	1.76
323 and 324*	0.20	0.01	112.1	0.95	7.9	1.41
Insignificant Emissions**	less than 5.00	-	-	less than 5.00	-	negligible
PTE of the Entire Source	**16.5**	**5.8**	**253.6**	**9.5**	**94.1**	**3.2**
Title V Major Source Thresholds	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

*The emissions are based on the permit limit of a combined total of 9,000 operating hours for generators 323 and 324.
**This is an estimate of emissions from blowdown activities and the fugitive VOC from equipment leaks

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

Emission Unit	Greenhouse Gas Emissions (CO_2 equivalent metric tons)
304	199,968
323 and 324	2,354
Total	**202,322**

2. Tribe Information

a. General

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

b. Local Air Quality and Attainment Status

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

3. Inapplicable Requirements

a. 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 304 located at TWP Leupp because the turbine was installed prior to February 18, 2005 and has not been modified or reconstructed.

b. NSPS for SO_2 Emissions from Onshore Natural Gas Processing for which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and On or Before August 23, 2011(40 CFR §§ 60.640 – 60.648; 40 CFR Part 60, Subpart LLL)

These regulations apply to sweetening units and sulfur recovery units at onshore natural gas processing facilities. As defined in this subpart, sweetening units are process devices that separate hydrogen sulfide (H_2S) and carbon dioxide (CO_2) from a sour natural gas stream. Sulfur recovery units are defined as process devices

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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 TWP Leupp; therefore, this subpart does not apply.

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

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

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

These regulations apply to storage vessels for petroleum liquids with storage capacities greater than 40,000 gallons and do not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer. There is no storage tank with a capacity greater than 40,000 gallons located on-site at TWP Leupp; therefore, this subpart does not apply.

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

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

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

These regulations apply to storage vessels with capacities greater than or equal to 75 cubic meters (471 bbl). Additionally, this Subpart does not apply to storage vessels with a design capacity less than or equal to 1,589.874 cubic meters used for petroleum or condensate stored, processed, or treated prior to custody transfer. There are no VOL storage tanks with a capacity greater than 75 cubic meters and petroleum or condensate storage tanks with a capacity greater than 1,589.874 cubic meters located on-site at TWP Leupp; therefore, this subpart does not apply.

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

These regulations establish emission standards and compliance requirements to control emissions from compression ignition (CI) internal combustion engines (ICE) that commence construction, modification or reconstruction after July 11, 2005, where the CI ICE have been manufactured after specified dates. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. The emission units 323 and 324 located at TWP Leupp are natural gas-fired reciprocating internal combustion engines (RICE) that were constructed prior to July 11, 2005 and have not been modified or reconstructed after July 11, 2005; therefore, subpart IIII does not apply.

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

These regulations establish emission standards and compliance requirements to control emissions from spark ignition (SI) internal combustion engines (ICE) that commence construction, modification or reconstruction after June 12, 2006, where the SI ICE are manufactured on or after specified dates. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. Units 323 and 324 located at TWP Leupp were constructed before June 12, 2006 and have not been modified or reconstructed after June 12, 2006; therefore, subpart JJJJ does not apply.

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

These regulations establish emission standards and compliance schedules to control volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. No equipment at TWP Leupp was constructed, modified or reconstructed after August 23, 2011; therefore, subpart OOOO does not apply.

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

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

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

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

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

These regulations apply to natural gas transmission and storage facilities that transport or store natural gas prior its entrance into a pipeline to a local distribution company or to a final end user and that are major sources of hazardous air pollutants (HAP), as defined in 40 CFR § 63.1271. The facilities covered by this source category include underground natural gas storage operations and natural gas compressor stations that receive natural gas via pipeline, from underground natural gas storage operations, or from natural gas processing plants. This subpart only applies to facilities that contain affected units, which consist of glycol dehydration units under 40 CFR § 63.1270(b). The TWP Leupp compressor station does not have any glycol dehydration units and is an area source of HAPs. Therefore, subpart HHH does not apply.

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

These regulations establish emission and operating limitations for hazardous air pollutant (HAP) emissions from existing, new, or reconstructed stationary combustion turbines located at major sources of HAP emissions as well as compliance requirements related to such limitations. A major source of HAP emissions is a source that emits or has the potential to emit 10 tpy of a single HAP or 25 tpy of a combination of HAPs. Under 40 CFR § 63.6090(b)(4), existing stationary combustion turbines that commenced construction or reconstruction on or before January 14, 2003 do not have to meet the requirements of this subpart. TWP Leupp is an area source of HAP emissions and turbine 304 at the facility was constructed before January 14, 2003. Therefore, the turbine 304 located at the facility is not subject to subpart YYYY.

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

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

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

These regulations apply to pollutant-specific emission units at major sources that are required to obtain 40 CFR part 70 or 71 permits where a unit is subject to an emission limitation or standard for the applicable regulated air pollutant, uses a control device to achieve compliance with such limitation or standard, and has potential pre-control device emissions of the applicable regulated air pollutant that equal or exceed the amount required for the source to be classified as a major source. No emission unit at TWP Leupp 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.

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4. Applicable Requirements

The following requirements apply to the TWP Leupp compressor station.

Table 5. Summary of Applicable Federal Requirements

Applicable Requirements	Emission Point/Unit
Federal Air Quality Requirement	304, 323, 324
Requirements for Specific Units	304, 323, 324
NSPS Subpart A (General Provisions)	304
NSPS Subpart GG (Gas Turbines)	304
NESHAP General Provisions (40 CFR Part 63, Subpart A)	323, 324
NESHAP for RICE (40 CFR Part 63, Subpart ZZZZ)	323, 324
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)

TWP Leupp was constructed in 1967 and modified in 2002. This existing source is not in one of the 28 source categories defined in 40 CFR § 52.21(b)(1)(iii), but the source has potential to emit NOx greater than 250 tons per year. Therefore, this source is an existing PSD major source.

In 2002, TWP Leupp replaced three engine-driven gas compressors with a single natural gas-fired turbine (Unit 304) and two power generator engines (Units 323 and 324). On November 16, 2001, US EPA issued a significant modification to install Units 304, 323 and 324. The modifications that occurred in 2002 did not trigger PSD because the Permittee proposed emission limits of 25 ppm for both NOx and CO from the gas turbine (Unit 304) and thus the modifications did not cause a significant net emission increase as defined in 40 CFR § 52.21.

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

These regulations apply to stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired that were constructed or modified after October 3, 1977. There is one natural gas-fired turbine, 304, at TWP Leupp. Unit 304 was installed after October 3, 1977 and has a maximum heat input capacity greater than 10 MMBtu/hr. Therefore, Unit 304 is subject to the requirements of 40 CFR, Subpart GG and the general provisions of 40 CFR Part 60, Subpart A. The NOx limit required by Subpart GG for a turbine with a heat input at peak load greater than 100 MMBtu/hr is 75 ppm (40 CFR § 60.332(a)(1)). The significant modification permit issued by U.S. EPA on November 16, 2001 streamlined the NOx emission limit from Unit 304 to 25 ppm at 15% O2, based on a three-hour average.

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Turbine 304 is subject to the sulfur requirements in 40 CFR 60, Subpart GG. Pursuant to 40 CFR 60.333(b), the total sulfur contained in the fuel combusted shall not exceed 0.8 percent by weight (8,000 ppmw).

The permittee has elected not to monitor the total sulfur content of the natural gas combusted in turbine 304 by using natural gas which meets the definition in 40 CFR 60.331(u), pursuant to 40 CFR 60.334(h)(3). The permittee has provided an excerpt from its current tariff from the Federal Energy Regulatory Commission (FERC) demonstrating that the fuel delivered to this plant satisfied the "natural gas" definition in 40 CFR 60.331(u).

The Permittee is required to conduct an annual performance test as described in 40 CFR § 60.8 for NOx and CO from Unit 304, at the maximum operating capacity, to demonstrate compliance with the NOx and CO emission limit pursuant to 40 CFR § 71.6(a)(3)(i).

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

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions as well as compliance requirements related to these limitations. The TWP Leupp compressor station is an area source of HAP emissions and consists of two 4-stroke lean burn generating engines (323 and 324) with more than 500 hp each. Pursuant to 40 CFR § 63.6603(a), units 323 and 324 must meet the requirements of Table 2d:8.

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

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

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

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

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

Requirement	Condition/ Section	Condition in Part 71 Permit	Description/Notes
Emission Limits	71.6	II.A.1	Limit of NOx emission concentration for Unit 304
	71.6	II.A.2	Limit of CO emission concentration for Unit 304
	71.6	II.A.3	Operational Requirement for Units 323 and 324
	71.6	II.A.4	Operational Requirement for Units 323 and 324
	71.6	II.A.5	Annual Testing Requirement for Unit 304
	71.6	II.A.6	Recordkeeping Requirement for Units 323 and 324
	71.6	II.A.7	General Recordkeeping Requirement
	71.6	II.A.8	Reporting Requirement
NSPS - 40 CFR Part 60, Subpart A	60.1	n/a	Applicability (no requirements)
	60.2	n/a	Definitions (no requirements)
	60.3	n/a	Units and abbreviations (no requirements)
	60.4(a)	II.B.1	Submit reports to EPA Region IX and NNEPA
	60.4(b)	n/a	Submit reports to delegated agencies (Tribe is not the delegated authority for NSPS)
	60.5	n/a	Applicability determinations (places requirements on US EPA, not the facility)
	60.6	n/a	Review of plans (places requirements on US EPA, not the facility)
	60.7(a)	II.B.9	Notification of construction or reconstruction (one-time only)
	60.7(b)	II.B.2	Records of startup, shutdown, and malfunction
	60.7(c)	n/a	CEMS reporting
	60.7(d)	n/a	Report format for CEMS reporting
	60.7(e)	n/a	Reporting frequency (PSD permit requires semi-annual excess emissions reports)
	60.7(f)	II.A.7	Maintain monitoring records for 5 years (PSD permit requires 2 years)
	60.7(g)	n/a	Notification required by state/local agency (no such notification required)
	60.7(h)	n/a	Disclaimer that subpart may clarify or make inapplicable any general provisions
	60.8	n/a	Initial performance tests (one time only)
	60.9	II.B.3	Availability of information
	60.10	n/a	State authority (no requirements)
	60.11(a)	II.B.4	Compliance with non-opacity standards

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	60.11(b)	n/a	Compliance with opacity standards (facility is not subject to opacity standard)
	60.11(c)	n/a	Times when opacity standards apply (facility is not subject to opacity standard)
	60.11(d)	II.B.5	Good practice to minimize emissions
	60.11(e)	n/a	Demonstrating compliance with opacity standards (facility is not subject to opacity standard)
	60.11(f)	n/a	Special provisions in subpart supersede general provisions (no requirements)
	60.11(g)	II.B.6	Credible evidence
	60.12	II.B.7	Circumvention
	60.13	n/a	CEMS requirements
	60.14	n/a	Modifications
	60.15	n/a	Reconstruction
	60.16	n/a	Priority list (no requirements)
	60.17	n/a	Incorporation of test methods by reference
	60.18	n/a	Requirements for flares (facility does not use flares to comply with NSPS)
	60.19	II.B.8	General notification and reporting
NSPS - 40 CFR Part 60, Subpart GG	60.330	n/a	Applicability (no requirements)
	60.331	II.C.2	NOx standard exemption during use of emergency fuel for Unit 304
	60.332	II.C.1	Standard for sulfur oxides (fuel sulfur standard)
	60.333	n/a	Standard for sulfur oxides (fuel sulfur standard)
	60.334(a)	n/a	Monitoring of water/steam, fuel for NOx control (the turbine does not use water injection to control NOx)
	60.334(b) & (c)	n/a	CEMS requirements
	60.334(d) through (g)	n/a	Monitoring of water/steam, fuel for NOx control for turbines constructed after July 8, 2004 (the turbine does not use water injection and was constructed in 2001)
	60.334(h)	II.C.3 II.C.4	Monitoring of fuel sulfur content not required if the fuel meets definition of natural gas in 40 CFR § 60.331(u)
	60.335	n/a	Test methods and procedures
NESHAP - 40 CFR Part 63, Subpart A	63.1	n/a	Applicability (no requirements)
	63.2	n/a	Definitions (no requirements)
	63.3	n/a	Units and abbreviations (no requirements)

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	63.4	II.D.1	Prohibited activities and circumvention
	63.5	II.D.2	Preconstruction notification
	63.6	n/a	Compliance with standards (no requirements)
	63.7	n/a	Performance testing (no requirements)
	63.8	II.D.3	Monitoring
	63.9	n/a	Notification
	63.10	II.D.4	Recordkeeping and reporting
	63.11-63.16	n/a	No requirements
NESHAP - 40 CFR Part 63, Subpart ZZZZ	63.6580 through 63.6590	n/a	Applicability (no requirements)
	63.6595	II.E	Compliance date
	63.6600 through 63.6602	n/a	Emission limitations for stationary RICE located at major sources of HAP emissions (facility is an area source of HAP emissions)
	63.6603	II.E.1	Emission and operating limitations for existing stationary RICE located at an area source of HAP emissions Units 323 and 324 are generators subjected to requirements of Table 2d.8 as stated in 40 CFR § 63.6603)
	63.6604	n/a	Diesel fuel requirements for CI RICE (Units 323 and 324 are RICEs which use natural gas as a fuel)
	63.6605	II.E.2	General compliance requirements
	63.6610 through 63.6620	n/a	Performance testing
	63.6625(e)(8) and (j)	II.E.3 - II.E.6	Maintenance and operation of generators Units 323 and 324
	63.6630 through 63.6635	n/a	Initial compliance with emission and operating limitations and demonstration of continuous compliance (Units 323 and 324 are not subject to emission or operating limitations or demonstrations of continuous compliance)
	63.6640	II.E.7 - II.E.9	Demonstration of compliance & reporting
	63.6645	n/a	Notifications (facility is not required to submit notification required in this section)
	63.6650	II.E.10	Reports
	63.6655 and 63.6660	II.E.11 - II.E.13	Recordkeeping

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	63.6665	n/a	General provisions
	63.6670	n/a	Implementation and enforcement
	63.6675	n/a	Definitions (no requirements)
Asbestos NESHAP - 40 CFR Part 61, Subpart M	61.140 through 61.157	III.E	Requirements for demolition and renovation at facilities containing asbestos
Stratospheric Ozone Protection – 40 CFR Part 82	82.1 through 82.306	III.D	Requirements for treatment of class I and class II substances

EPA promulgated a Federal Implementation Plan for preconstruction review of major sources in nonattainment areas and of minor sources and minor modifications at major sources in both attainment and nonattainment areas, which became effective on August 30, 2011. (*See* 76 FR 38748, July 1, 2011.) These regulations, codified in 40 CFR Parts 49 and 51, establish pre-construction review requirements for sources that will be incorporated in Part 71 federal operating permits. TWP Leupp 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 April 25, 2000. US EPA issued a major modification to the permit on November 20, 2001. NNEPA issued the Part 71 Operating Permit NN OP 09-001 for the facility on October 12, 2010. This permit is being renewed again in this action.

All conditions from previous approvals are being incorporated into this Part 71 Permit Renewal. One additional monitoring requirement, which comes from 40 CFR Part 63, Subpart ZZZZ, is being included in the Title V permit. The monitoring requirements in this permit are summarized below in Table 7.

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Table 7. Monitoring in the Title V Permit

Requirement	Requirement Condition #	Monitoring in Part 71 Permit	Monitoring Condition #
NOx, CO, and opacity Limits (Unit 304)	II.A.1 & II.A.2	Stack testing annually	II.A.5 & II.A.14
Operating Hours Limit (Units 323 and 324)	II.A.3 & II.A.4	Limit of Operating Hours	II.A.6
Fuel sulfur content limit	II.C.1	FERC tariff with maximum total fuel sulfur content of natural gas	II.C.3 & II.C.4

6. Endangered Species Act

Pursuant to Section 7 of the Endangered Species Act (ESA), 16 U.S.C. § 1536, and its implementing regulations at 50 CFR Part 402, US EPA is required to ensure that any action authorized, funded, or carried out by US EPA is not likely to jeopardize the continued existence of any federally listed endangered species or threatened species or result in the destruction or adverse modification of the designated critical habitat of any such species. NNEPA is issuing this federal Part 71 permit pursuant to a delegation from US EPA. However, this permit does not authorize the construction of new emission units or emission increases from existing units, nor does it otherwise authorize any other physical modifications to the facility or its operations. Therefore, NNEPA and US EPA have concluded that the issuance of this permit will have no effect on listed species or their critical habitat.

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 TWP Leupp, NNEPA and US EPA in such determinations.

8. NNEPA Authority

Authority to administer a Part 71 Permit Program was delegated to NNEPA by US EPA in part on October 13, 2004 and in whole on March 21, 2006. In delegating to NNEPA the authority to administer the Part 71 operating permit program, US EPA determined that NNEPA had adequate independent authority to administer the program, as required by 40 CFR § 71.10(a). Specifically, US EPA found NNEPA had adequate permit processing requirements and adequate permit enforcement-related investigatory authorities.

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

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

b. Response to Comments

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

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Emission Calculations
From One (1) NG Fired Turbine 304
Transwestern Pipeline Company - Leupp Compressor Station # 3
Section 5/6, Township 22-N, Range 14-E
8 Miles East of Leupp, Arizona

Heat Input Capacity MMBtu/hr	Site Power Output hp
390.2	33,915

1. Potential to Emit of Criteria Pollutants

	Pollutant						
	PM*	PM_{10}*	$PM_{2.5}$*	SO_2*	NO_x**	VOC*	CO**
Emission Factor	6.60E-03 (lbs/MMBtu)	6.60E-03 (lbs/MMBtu)	6.60E-03 (lbs/MMBtu)	3.40E-03 (lbs/MMBtu)	32.32 (lb/hr)	2.10E-03 (lbs/MMBtu)	19.67 (lb/hr)
PTE (tons/yr)	**11.3**	**11.3**	**11.3**	**5.8**	**141.6**	**3.6**	**86.2**

*The emission factors for PM,$PM_{2.5}$, PM_{10}, SO_2 and VOC are from AP-42, Chapter 3.1, Table 3.1-2a for Stationary Gas Turbines (04/00).
**The annual CO and NOx emissions are the emission limits established in Title V permit, permit # NN-OP 99-001 , originally issued on 04/25/00.

Methodology

PTE of PM_{10} (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

2. Potential to Emit HAPs

Pollutant	Emission Factor (lbs/MMBtu)	PTE of HAP (tons/yr)
1,3-Butadiene	4.30E-07	7.35E-04
Acetaldehyde	4.00E-05	6.84E-02
Acrolein	6.40E-06	1.09E-02
Benzene	1.20E-05	2.05E-02
Ethylbenzene	3.20E-05	5.47E-02
Formaldehyde	7.10E-04	1.21E+00
Naphthalene	1.30E-06	2.22E-03
PAH	2.20E-06	3.76E-03
Propylene Oxide	2.90E-05	4.96E-02
Toluene	1.30E-04	2.22E-01
Xylene	6.40E-05	1.09E-01
Total HAPs		**1.76**

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

Methodology

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

Emission Calculations
From Two (2) NG Fired Reciprocrating Engines 323 & 324
Transwestern Pipeline Company - Leupp Compressor Station # 3
Section 5/6, Township 22-N, Range 14-E
8 Miles East of Leupp, Arizona

Heat Input Capacity MMBtu/hr	Max. Power Output hp	Operating Hour Limit hrs/yr
4.47	526	9000

1. Potential to Emit of Criteria Pollutants

	Pollutant						
	PM*	PM_{10}*	$PM_{2.5}$*	SO_2*	NO_x**	VOC**	CO**
Emission Factor	7.71E-05 (lbs/MMBtu)	9.99E-03 (lbs/MMBtu)	9.99E-03 (lbs/MMBtu)	5.88E-04 (lbs/MMBtu)	24.90 (lbs/hr)	2.10E-01 (lbs/hr)	1.76 (lbs/hr)
PTE (tons/yr)	**0.002**	**0.201**	**0.201**	**0.0118**	**112.1**	**0.95**	**7.9**

*The emission factors for PM, PM_{10}, and SO_2 are from AP-42, Chapter 3.2, Table 3.2-2 for 4-stroke lean burn engines (7/00).
PM10 includes condensible PM and filterable PM_{10}.
**The emission factors (lb/hr) for CO , NOx, VOC are from manufacturer's data.

Note: Transwestern requested an increase in the operating hours for the two electric generator engines combined to 9000 hours (refer section II.B.4 of the permit)

Methodology

PTE of PM_{10} (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x Operating Hour Limit (hrs/yr) x 1 ton/2000 lbs

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**	**PTE of HAP (tons/yr)**
1,3-Butadiene	2.67E-04	5.37E-03
Acetaldehyde	8.36E-03	1.68E-01
Acrolein	5.14E-03	1.03E-01
Benzene	4.40E-04	8.85E-03
Ethylbenzene	3.97E-05	7.99E-04
Formaldehyde	5.28E-02	1.06E+00
Methanol	2.50E-03	5.03E-02
Styrene	2.36E-05	4.75E-04
Toluene	4.08E-04	8.21E-03
Xylene	1.84E-04	3.70E-03
Total HAPs		**1.41**

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

Methodology

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

Emission Calculations
Potential to Emit Greenhouse Gases
Transwestern Pipeline Company - Leupp Compressor Station # 3
Section 5/6, Township 22-N, Range 14-E
8 Miles East of Leupp, Arizona

Emission Unit ID	Site Rating		Hours of Operation	Emission Factors (kg/MMBtu)			Global Warming Potentials	
	Hp	MMBtu/hr		CO_2	CH_4	N_2O	CH_4	N_2O
304	33,915	390.2	8,760	53.02	1.00E-03	1.00E-04	21	310
323 & 324	526	4.47	9,000	53.02	1.00E-03	1.00E-04	21	310

Emission Rate (lb/hr)				Emissions (tpy)			
CO_2	CH_4	N_2O	CO_2e	CO_2	CH_4	N_2O	CO_2e
45,610	0.86	0.086	45,655	199,772	3.8	0.4	199,968
522	0.01	0.001	523	2,351	0.0	0.0	2,354
Total				**202,123**	**4**	**0.4**	**202,322**

1 kg = 2.20462 lb

Emission factors for natural gas were obtained from Tables C-1 and C-2 of 40 CFR 98, Subpart C
Global Warming Potentials were obtained 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)

Emission Calculations
Potential to Emit Summary
Transwestern Pipeline Company - Leupp Compressor Station # 3
Section 5/6, Township 22-N, Range 14-E
8 Miles East of Leupp, Arizona

Emission Units	PM (tons/yr)	PM_{10} (tons/yr)	$PM_{2.5}$ (tons/yr)	SO_2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
Turbine 304	11.28	11.28	11.28	5.81	141.6	3.59	86.2	1.76
Engines 323,324	0.00	0.20	0.20	0.012	112.1	0.95	7.9	1.41
Insignificant Activities *	5	5	5			5		Negligible
Total PTE	**16.3**	**16.5**	**16.5**	**5.82**	**253.6**	**9.53**	**94.1**	**3.17**

* This is an estimate on the PM_{10}/$PM_{2.5}$ emissions and fugitive VOC emissions from equipment leaks, blowdown, and pressure relief valves.