Navajo Nation Environmental Protection Agency
Navajo Nation Operating Permit Program

El Paso Natural Gas Company (EPNG)
Navajo Compressor Station

Permit No: NN OP 19-003

2019

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El Paso Natural Gas Company – Navajo Compressor Station

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THE NAVAJO NATION

JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

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

PERMIT #:	FACILITY NAME:	LOCATION:	COUNTY:	STATE:
NN OP 19-003	EL PASO NATURAL GAS COMPANY-NAVAJO COMPRESSOR STATION	CORNFIELDS	APACHE	AZ

ISSUE DATE:	EXPIRATION DATE:	AFS PLANT ID:	PERMITTING AUTHORITY:
XX/XX/2019	XX/XX/2024	04-017-N0610	NNEPA

ACTION/STATUS: PART 71 OPERATING PERMIT

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Abbreviations and Acronyms

AR	Acid Rain
ARP	Acid Rain Program
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
EIP	Economic Incentives Program
EU	Emission Unit
EPNG	El Paso Natural Gas
gal	gallon
HAP	Hazardous Air Pollutant
hp	horsepower
hr	hour
Id. No.	Identification Number
kg	kilogram
lb	pound
MACT	Maximum Achievable Control Technology
Mg	megagram
MMBtu	million British Thermal Units
mo	month
MVAC	Motor Vehicle Air Conditioner
NESHAP	National Emission Standards for Hazardous Air Pollutants
NNEPA	Navajo Nation Environmental Protection Agency
NNOPR	Navajo Nation Operating Permit Regulations
NNR	Navajo Nation Regulations
NOx	Nitrogen Oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PM	Particulate Matter
PM-10	Particulate Matter less than 10 microns in diameter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
psia	pounds per square inch absolute
RMP	Risk Management Plan
scf	standard cubic foot
SNAP	Significant New Alternatives Program
SO_2	Sulfur Dioxide
tpy	tons per year
TSP	Total Suspended Particulate
US EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

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I. Source Identification

- Parent Company Name: Kinder Morgan Inc,
- Parent Company Address: 1001 Louisiana St.
  Houston, Texas 77002
- Plant Operator: El Paso Natural Gas Company, L.L.C. (EPNG)
- Plant Operator Address: 2 North Nevada Avenue
  Colorado Springs, CO 80903
- Plant Name: Navajo Compressor Station
- Plant Location: Section 24, Township 25-N, Range 24-E
  31 miles north of Chambers, Arizona
- County: Apache, Arizona
- EPA Region: IX
- Reservation: Navajo Nation
- Company Contact: Richard Duarte Phone: (505) 831-7763
- Responsible Official: Joseph E. McLaughlin, VP Phone: (713) 369-8763
- Alternate RO: Philip L. Baca, Director Phone (520) 663-4224
- EPA Contact: Lisa Beckham Phone: (415) 972-3811
- Tribal Contact: Tennille Denetdeel Phone: (928) 729-4248
- SIC Code: 4922
- AFS Plant Id. No. 04-017-N0610
- Description of Process: The facility is a natural gas compressor station that recompresses natural gas for delivery to a pipeline for mainline transportation. The facility consists of four (4) combustion turbines that drive centrifugal gas compressors. The operation of all compressor units will depend on gas demand from end users. The auxiliary turbines are used for full-time power only.
- Significant Emission Units:

Unit ID	Unit Description	Maximum Capacity	Commenced Construction/ Installation Date	Associated Control Equipment
C-01	Natural gas-fired turbine, Simple cycle, Solar Taurus T6500- SLN with NOx, CO & O_2 CEMS	45.3 MMBtu/hr 5304 hp	April 1992	Dry Low NOx Combustor
C-02	Natural gas-fired turbine, regenerative cycle, GE Frame 3 (Model J)	95.7 MMBtu/hr 12913 hp	January 1993	N/A
D-01	Natural gas-fired turbine, regenerative cycle, GE Frame 3 (Model F)	78.9 MMBtu/hr 10784 hp	January 1993	N/A
D-02	Natural gas-fired turbine, regenerative cycle, GE Frame 3 (Model F)	78.9 MMBtu/hr 10784 hp	January 1993	N/A
AUX C-01*	Natural gas-fired turbine (auxiliary power), Simple cycle, Solar Saturn 20	16.03 MMBtu/hr 1160 hp	January 1993	N/A

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AUX D-01**	Natural gas-fired turbine (auxiliary power), Simple cycle, Solar Saturn 20	16.03 MMBtu/hr 1160 hp	January 1993	N/A

*The original build date is June 29, 1971. ** The original build date is January 28, 1972. Horsepower capacities are based on site elevation at 60°F for turbine units C-01, C-02, D-01 and D-02.

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II. Requirements for Specific Units

II.A. PSD Permit Requirements [PSD Permit AZP 90-2]

Emission Limits

1. The permittee shall not discharge or cause the discharge into the atmosphere NOx (as NO_2) in excess of the more stringent of 6.26 lb/hr or 42 ppmvd of NOx at 15% O_2 (3-hour rolling average, at ISO conditions) from the stack venting gas turbine C-01. [PSD permit AZP 90-2 Condition IX.D] [40 CFR § 60.332(a)]

2. The permittee shall not discharge or cause the discharge into the atmosphere of CO in excess of the more stringent of 5.084 lb/hr or 50 ppmvd at 15% O_2 (3-hour rolling average) from the stack venting gas turbine C-01. [PSD permit AZP 90-2 Condition IX.D]

3. The permittee shall not discharge or cause the discharge into the atmosphere any gases with opacity in excess of 10% (six-minute rolling average) from the stack venting gas turbine C-01. [PSD permit AZP 90-2 Condition IX.D]

Work Practice and Operational Requirements

4. The permittee shall continuously operate a Dry Low-NOx Combustor for control of NOx emissions from gas turbine C-01. [PSD permit AZP 90-2 Condition IX.B]

Monitoring and Testing Requirements

5. Annually, and at such other times as specified by US EPA Region IX, the permittee shall conduct performance test for NOx and CO emissions from gas turbine C-01 and furnish to US EPA Region IX and NNEPA a written report of the results of such test. The test for NOx and CO shall be conducted at the maximum operating capacity of the facility 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. Also, after initial performance test and upon written request from the permittee, US EPA Region IX and NNEPA may approve the deletion of a specific annual test for the combustion units. [PSD permit AZP 90-2 Condition IX.C.1.a and b]

6. Performance tests for the emissions of NOx and CO from gas turbine C-01 shall be conducted and the results reported in accordance with the test methods set forth in 40 CFR §§ 60, 60.8, and Appendix A. These performance tests shall be conducted using US EPA Methods 1-4, 7E, and 19. [PSD permit AZP 90-2 Condition IX.C.2]

7. US EPA Region IX and NNEPA shall be notified in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test

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plan and to arrange for an observer to be present at the test. Such prior approval will minimize the possibility of the rejection of these test results by US EPA Region IX and NNEPA for procedural deficiencies. In lieu of the above mentioned test methods, equivalent methods may be used with prior written approval from US EPA Region IX and NNEPA. [PSD permit AZP 90-2 Condition IX.C.2]

8. For performance test purposes, sampling ports, platforms, and access shall be provided by the permittee on the combustion exhaust system in accordance with 40 CFR § 60.8(e). [PSD permit AZP 90-2 Condition IX.C.3]

9. The permittee shall install, maintain, and operate the following continuous monitoring systems in the stack venting gas turbine (unit C-01) [PSD permit AZP 90-2 Condition IX.E.1.a and b]

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

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

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

11. The permittee shall maintain a quality assurance project plan for the certification and operation of CEMS. Such a plan shall conform to the quality assurance procedure set forth in 40 CFR Part 60 Appendix F, "Quality Assurance Procedures". [PSD permit AZP 90-2 Conditions IX.E.6]

Recordkeeping Requirements

12. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and

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maintenance performed on these systems or devices, and all other information required by 40 CFR § 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records. [PSD permit AZP 90-2 Condition IX.E.7] [40 CFR § 60.7(f)]

Reporting Requirements

13. The permittee shall submit a written report of all excess emissions to NNEPA and US EPA Region IX for every calendar quarter. The report shall include the following [PSD permit AZP 90-2 Condition IX.E.3]

    a. The magnitude of excess emissions computed in accordance with 40 CFR § 60.13(h), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions.

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

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

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

    e. Excess emissions shall be defined as the following:

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

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

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

Facilities Operation

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14. All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of the PSD Permit shall at all times be maintained in good working order and be operated as intended so as to minimize air pollutant emissions. [PSD permit AZP 90-2 Condition III]

Malfunction

15. NNEPA and US EPA Region IX shall be notified by telephone within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Condition II.A of this permit. In addition, NNEPA and US EPA Region IX shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed under Condition II.A of this permit, and the methods utilized to restore normal operations. Compliance with this malfunction notification provision shall not excuse or otherwise constitute a defense to any violations of this permit or of any law or regulations which such malfunction may cause. [PSD permit AZP 90-2 Condition IV]

Transfer of Ownership

16. In the event of any changes in control or ownership of the facilities to be constructed, the PSD Permit shall be binding on all subsequent owners and operators. The applicant shall notify the succeeding owner and operator of the existence of the PSD Permit and its conditions by letter, a copy of which shall be forwarded to the Regional Administrator, the State and local air pollution control agency, and NNEPA. [PSD permit AZP 90-2 Condition VI]

Other Applicable Regulations

17. The permittee shall construct and operate this facility in compliance with all other applicable provisions of 40 CFR §§ 52, 60 and 61 and all other applicable federal, state and local air quality regulations. [PSD permit AZP 90-2 Condition VIII]

II.B. NSPS General Provisions

The following requirements apply to gas turbines C-01, C-02, D-01, D-02, AUX C-01 and AUX D-01 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

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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 an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR § 60.7(b)]

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

4. Compliance with standards in 40 CFR Part 60, other than opacity standards, shall be determined in accordance with performance tests established by 40 CFR § 60.8, unless otherwise specified in the applicable standard. Compliance with the fuel sulfur standard listed in 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.2 of this permit. [40 CFR § 60.11(a)]

5. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate EPNG Navajo, 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 § 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 the applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR § 60.11(g)]

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7. The permittee shall not build, erect, install, or use any article, machine, equipment, or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR § 60.12]

8. With respect to applicable NSPS provisions under 40 CFR Part 60, the permittee shall comply with the general notification and reporting requirements found in 40 CFR § 60.19. [40 CFR § 60.19]

9. The permittee shall provide to NNEPA and US EPA Region IX written notification or, if acceptable to NNEPA, US EPA Region IX, and the permittee, electronic notification of any reconstruction of EPNG Navajo or any physical or operational change to EPNG Navajo which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under this permit or in 40 CFR § 60.14(e). [40 CFR § 60.7(a)]

II.C. NSPS for Stationary Gas Turbines

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

1. The permittee shall not burn any gaseous fuel in the gas turbines C-01, C-02, D-01, D-02, AUX C-01 and AUX D-01 which contains a maximum total sulfur content exceeding 20.0 grains/100 scf. [40 CFR § 60.331(u)]

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

3. To demonstrate compliance under 40 CFR § 60.334(h)(3), the permittee will provide a copy of the gas quality section of its current tariff from the Federal Energy Regulatory Commission (FERC) and certify at least once every six months that the fuel being fired in gas turbines C-01, C-02, D-01, D-02, AUX C-01 and AUX D-01 satisfies the definition of "natural gas" in 40 CFR § 60.331(u). [40 CFR § 60.334(h)(3)]

4. Each CEMS must be installed and certified according to performance specifications 2 and 3 (for diluent) of 40 CFR § 60 Appendix B, except the 7-day calibration drift is based on unit operating days, not calendar days. Appendix F,

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Procedure 1 is not required. The relative accuracy test audit (RATA) of the NOx and diluent monitors may be performed either:

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

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

c. On a ppm basis (for NOx) and a percent CO_2 basis (for a CO_2 monitor that uses the procedures in Method 20 to correct the NOx data to 15 percent O_2).

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

5. The CEMS on the gas turbine C-01 must be in compliance with the recording requirements specified in 40 CFR § 60.13(e)(2), and with the CEMS data collection requirements of 40 CFR §§ 60.334(b)(2) and 60.334(c).

6. For purposes of identifying excess emissions, CEMS data must be reduced to hourly averages as specified in 40 CFR § 60.13(h).

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

   b. A worst case ISO correction factor may be calculated and applied using historical ambient data. For the purpose of this calculation, substitute the maximum humidity of the ambient air (H_o), minimum ambient temperature (T_a), and minimum combustor inlet absolute pressure (P_o) into the ISO correction equation. [40 CFR §§ 60.334(b)(3) and 60.334(c)]

Monitoring and Testing Requirements

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

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8. The permittee shall determine compliance with the applicable nitrogen oxides emission limitation in Condition II.A.1 and 2 and 40 CFR § 60.332 and shall meet the performance test requirements of 40 CFR § 60.8 as follows: [40 CFR § 60.335(b)(1)]

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

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

   where:

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

9. The 3-run performance test required by this permit must be performed within ±5 percent at 30, 35, 75, and 90-to-100 percent of peak load or at four evenly-spaced load points in the normal operating range of the gas turbine, including the minimum point in the operating range and 90-to-100 percent peak load, or at the highest achievable load point if 90-to-100 percent of peak load cannot by physically achieved in practice. [40 CFR § 60.335(b)(2)].

10. The permittee shall perform a visible emissions inspection on gas turbine C-01 after every 400 hours of cumulative operation of this unit using any fuel other than natural gas. If any visible emissions are observed during such an inspection, then the permittee shall conduct an opacity test on unit C-01 using EPA Method 9 within 3 working days of the observation. [40 CFR § 71.6(a)(3)(i)]

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

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

2. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

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3. For purposes of this permit, "applicable requirement" means all of the following as they apply to emissions units in a Part 71 source (including requirements that have been promulgated or approved by US EPA through rulemaking at the time of issuance but have future compliance dates) [40 CFR § 71.2] :

a. Any standard or other requirement provided for in the applicable implementation plan approved or promulgated by US EPA through a rulemaking under Title I of the Clean Air Act ("CAA") that implements the relevant requirements of the CAA, including any revisions to that plan promulgated in 40 CFR Part 52;

b. Any term or condition of any preconstruction permits issued pursuant to regulations approved or promulgated through rulemaking under Title I, including Parts C or D, of the CAA;

c. Any standard or other requirement under Section 111 of the CAA, including Section 111(d);

d. Any standard or other requirement under section 112 of the CAA, including any requirement concerning accident prevention under Section 112(r)(7) of the CAA;

e. Any standard or other requirement of the acid rain program under Title IV of the CAA or 40 CFR Parts 72 through 78;

f. Any requirements established pursuant to Section 114(a)(3) or 504(b) of the CAA;

g. Any standard or other requirement under Section 126(a)(1) and (c) of the CAA;

h. Any standard or other requirement governing solid waste incineration under Section 129 of the CAA;

i. Any standard or other requirement for consumer and commercial products under Section 183(e) of the CAA;

j. Any standard or other requirement for tank vessels under Section 183(f) of the CAA;

k. Any standard or other requirement of the program to control air pollution from outer continental shelf sources under Section 328 of the CAA;

l. Any standard or other requirement of the regulations promulgated at 40 CFR Part 82 to protect stratospheric ozone under Title VI of the CAA,

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unless the EPA Administrator has determined that such requirements need not be contained in a Title V permit; and

m. Any national ambient air quality standard or increment or visibility requirement under Part C of Title I of the CAA, but only as it would apply to temporary sources permitted pursuant to Section 504(e) of the CAA.

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

1. The permittee is allowed to make a limited class of changes under Section 502(b)(10) of the Clean Air Act within EPNG Navajo that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions) and are not Title I modifications. This class of changes does not include:

   a. Changes that would violate applicable requirements; or

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

2. The permittee is required to send a notice to NNEPA and US EPA Region IX at least 7 days in advance of any change made under this provision. The notice must describe the change, when it will occur and 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 provision.

III. Facility-Wide or Generic Permit Requirements [40 CFR § 71.6(a)(1)]

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:

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

   1.0 Purpose of the test
   2.0 Source Description and Mode of Operation during Test
   3.0 Scope of Work Planned for Test
   4.0 Schedule/Dates
   5.0 Process Data to be Collected During Test
   6.0 Sampling and Analysis Procedures
   6.1 Sampling Locations
   6.2 Test Methods
   6.3 Analysis Procedures and Laboratory Identification
   7.0 Quality Assurance Plan
   7.1 Calibration Procedures and Frequency
   7.2 Sample Recovery and Field Documentation
   7.3 Chain of Custody Procedures
   7.4 QA/QC Project Flow Chart
   8.0 Data Processing and Reporting
   8.1 Description of Data Handling and QC Procedures
   8.2 Report Content

2. Unless otherwise specified by an applicable requirement or permit condition in Section II, all source tests shall be performed at maximum operating rates (90% to 110%) of device design capacity.

3. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test. The permittee must keep a record of adjustments made to any operating parameters within two (2) hours of the start of a test, along with the reason for these adjustments, and this record must be submitted to NNEPA and US EPA Region IX office along with the test results. NNEPA and US EPA Region IX reserves the right to determine whether any operating adjustments made during a source test, that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants should render the source test invalid.

4. During each test run and for two (2) hours prior to the test and two (2) hours after the completion of the test, the permittee shall record the following information:

   a. Fuel characteristics and/or amount of product processed (if applicable).

   b. Visible emissions.

   c. All parametric data which is required to be monitored in Section II for the emission unit being tested.

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d. Other source specific data identified in Section II such as minimum test length (e.g., one hour, 8 hours, 24 hours, etc.), minimum sample volume, other operating conditions to be monitored, correction of O_2, etc.

5. Each source test shall consist of at least three (3) valid test runs and the emissions results shall be reported as the arithmetic average of all valid test runs and in the terms of the emission limit. There must be at least 3 valid test runs, unless otherwise specified.

6. Source test reports shall be submitted to NNEPA and US EPA Region IX within 60 days of completing any required source test.

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

In addition to the unit specific recordkeeping requirements derived from the 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

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maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records.

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

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

1. The permittee shall submit to NNEPA and US EPA Region IX reports of any monitoring required under 40 CFR §§ 71.6(a)(3)(i)(A), (B), or (C) each six-month reporting period from January 1 to June 30 and from July 1 to December 31. All reports shall be submitted to NNEPA and US EPA Region IX and shall be postmarked by the 30th day following the end of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Section IV.E.

   a. A monitoring report under this section must include the following:

      i. The company name and address.

      ii. The beginning and ending dates of the reporting period.

      iii. The emissions unit or activity being monitored.

      iv. The emissions limitation or standard, including operational requirements and limitations (such as parameter ranges), specified in the permit for which compliance is being monitored.

      v. All instances of deviations from permit requirements, including those attributable to upset conditions as defined in the permit and including excursions or exceedances as defined under 40 CFR § 64, and the date on which each deviation occurred.

      vi. If the permit requires continuous monitoring of an emissions limit or parameter range, the report must include the total operating time of the emissions unit during the reporting period, the total duration of excess emissions or parameter exceedances during the reporting period, and the total downtime of the continuous monitoring system during the reporting period.

      vii. If the permit requires periodic monitoring, visual observations, work practice checks, or similar monitoring, the report shall

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

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

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

b. Any report required by an applicable requirement, as defined in Condition II.D.3. that provides the same information described in Condition III.C.1.a.i through ix above shall satisfy the requirement under Condition III.C.1.

c. "Deviation," means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or record keeping established in accordance with 40 CFR §§ 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

i. A situation when emissions exceed an emission limitation or standard;

ii. A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met.

iii. A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

iv. A situation in which an exceedance or an excursion, as defined in the compliance assurance plan at 40 CFR § 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

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reporting deviations, reports of deviations shall be submitted based on the following schedule:

a. For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

b. For emissions of any regulated pollutant excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

c. For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report required in Condition III.C.1 of this permit.

3. If any of the conditions in Condition III.C.2.a or b of this permit are met, the source must notify NNEPA and US EPA Region IX by telephone, facsimile or electronic mail sent to airquality@navajo-nsn.gov and aeo_r9@epa.gov., based on the timetable listed. A written notice, certified consistent with Condition III.C.4, must be submitted within 10 working days of the occurrence. All deviations reported under this paragraph must also be identified in the 6-month report required under Condition III.C.1.

4. Any application form, report, or compliance certification required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III.D. Stratospheric Ozone and Climate Protection [40 CFR § 82]

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR § 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 it is 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 § 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 September 1 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 September 1 of each year. Calculations of actual or estimated emissions and calculation of the fees owed shall be computed on the fee calculation worksheets provided by the US EPA. Fee payment of the full amount must accompany each fee calculation worksheet. [NNOPR § 603(A)].

3. The fee calculation worksheet shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR § 71.5(d).

4. Basis for calculating the annual fee:

   The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all fee pollutants emitted from the source by the applicable

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

a. "Actual emissions" means the amount of emissions calculated using the actual rate of emissions in TPY of any fee pollutant emitted from a Part 71 source over the preceding calendar year and each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. Actual emissions shall not include emissions of any one fee pollutant in excess of 4,000 TPY, or any emissions that come from insignificant activities. [NNOPR §§ 602(B)(1), 102(5)]

b. Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.

c. If actual emissions cannot be determined using the compliance methods in the permit, the permittee shall use other federally recognized procedures.

d. The term "fee pollutant" is defined in NNOPR § 102(24).

e. The term "regulated air pollutant" is defined in NNOPR § 102(50), except that for purposes of this permit the term does not include any pollutant that is regulated solely pursuant to 4 N.N.C. § 1121 nor does it include any hazardous air pollutant designated by the Director of NNEPA pursuant to 4 N.N.C. § 1126(B).

f. The permittee should note that the applicable fee is revised each year to account for inflation, and it 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 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 §§ 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)(3)][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)]

3. The certification shall include the following:

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

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

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

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

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

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

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

IV.E. Submissions [40 CFR §§ 71.5(d), 71.6][NNOPR § 702][The NNOPR provision is enforceable by NNEPA only.]

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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, and 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 reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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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 Conditions 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 above, 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.

4. The permittee may make the change proposed in its minor permit modification application immediately after it files such application. After the permittee makes the change allowed by the preceding sentence, and until NNEPA takes any of the actions authorized by 40 CFR §§ 71.7(e)(1)(iv)(A) through (C), the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the permittee need not comply with the existing permit terms and conditions it seeks to modify. If the

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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)][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 source, 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 the 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 may 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. 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, 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

JONATHAN NEZ | PRESIDENT MYRON LIZER | VICE PRESIDENT

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

Detailed Information
Permitting Authority: Navajo Nation Environmental Protection Agency

County: Apache **State:** Arizona **AFS Plant ID:** 04-017-N0610

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

Part 71 Federal Operating Permit
Statement of Basis

El Paso Natural Gas Company, LLC (EPNG)
Navajo Compressor Station
Permit No. NN OP 19-003

1. Facility Information

a. Permittee

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

b. Facility Location

Section 24, Township 25-N, Range 24-E
31 miles North of Chambers, Arizona

c. Contact Information

Facility Contact:	Richard Duarte, Engineer – Air Compliance Phone: (505) 831-7763
Responsible Official:	Joseph E. McLaughlin, VP Phone: (713) 369-8763
Alternate Responsible Official:	Philip L. Baca, Division Director Phone: (520) 663-4224

d. Description of Operations, Products:

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

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e. Permitting and/or Construction History

The facility was placed in service in 1951 and consisted of two plants within the facility (A and B), 18 reciprocating engines for gas compression, and 5 auxiliary engines for power generation.

In 1991, El Paso Natural Gas Company (EPNG) received PSD permit AZP 90-2 for the installation of one Solar Centaur H simple cycle turbine with a Dry-Low NOx (DLN) Combustor. In 1993, the facility was modernized with the replacement of A and B plants with new turbines in C and D plants.

The facility modernization consisted of the replacement of the Solar Centaur H with a Solar Taurus T6500, a simple cycle turbine with DLN (emission unit C-01). Also, the following units were installed: 3 turbines for gas compression (emission units C-02, D-01, and D-02), and 2 turbines for auxiliary power generation (emission Units AUX C-01 and AUX D-01).

Consent Decree CIV 93-0920PHXCAM: On August 5, 1993, EPNG and EPA entered into a consent decree to address the permitting issues regarding facility modernization. As a part of the consent decree, installation of emission unit C-01 was required in accordance with the PSD permit AZP 90-2 issued by EPA for the installation of Solar Centaur H. The Consent Decree additionally required that construction and operation of emission units AUX C-01 and AUX D-01 be in accordance with 40 CFR § 60, Subpart A and Subpart GG.

The source was issued PSD permit AZP 90-2 on October 25, 1991, and the following approvals:

I. An amendment to Special Condition IX.D and IX.F was issued on September 7, 1999.
II. An amendment to Special Condition IX.E.1.c and IX.F was issued on May16, 2000.

The initial Title V permit for this facility was issued by EPA in 2000, along with minor revisions to PSD permit. The Title V permit was renewed by NNEPA in 2006 and 2012.

f. Permitted Emission Units and Control Equipment

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	Unit Description	Maximum Capacity	Commenced Construction/ Installation Date	Associated Control Equipment
C-01	Natural gas-fired turbine, Simple cycle, Solar Taurus T6500- SLN with NOx, CO & O_2 CEMS	45.3 MMBtu/hr 5,304 hp	April 1992	Dry Low NOx Combustor
C-02	Natural gas-fired turbine, regenerative cycle, GE Frame 3 (Model J)	95.7 MMBtu/hr 12,913 hp	January 1993	N/A
D-01	Natural gas-fired turbine, regenerative cycle, GE Frame 3 (Model F)	78.9 MMBtu/hr 10,784 hp	January 1993	N/A
D-02	Natural gas-fired turbine, regenerative cycle, GE Frame 3 (Model F)	78.9 MMBtu/hr 10,784 hp	January 1993	N/A
AUX C-01*	Natural gas-fired turbine (auxiliary power), Simple cycle, Solar Saturn 20	16.03 MMBtu/hr 1,160 hp	January 1993	N/A
AUX D-01**	Natural gas-fired turbine (auxiliary power), Simple cycle, Solar Saturn 20	16.03 MMBtu/hr 1,160 hp	January 1993	N/A

*The original build date is June 29, 1971
** The original build date is January 28, 1972
Horsepower capacities are based on site elevation at 60°F for turbine units C-01, C-02, D-01 and D-01

g. <u>Insignificant Activities</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

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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. List of storage tanks present at the source:

Tank No.	Date Installed	Capacity (gal)	Liquid Stored
T-01	1992	1692	Ambitrol
T-02	1991	8400	Turbine oil
T-03	unknown	1000	Used oil
T-04	unknown	1500	Water/Used oil

h. Emission Calculations

See Appendix A of this document for detailed calculations.

i. Potential to Emit

Potential to emit (PTE) means the maximum capacity of any stationary source to emit any CAA-regulated air pollutant under the source's physical and operational design. See 40 C.F.R. § 52.21(b)(4). Any physical or operational limitation on the maximum capacity of EPNG Navajo 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 2 and 3 below.

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Table 2. Potential to Emit of Criteria Air Pollutants

Emission Unit ID	Regulated Air Pollutants in tons per year (tpy)					
	PM_{10}	SO_2	NOx	VOC	CO	Total HAPs
C-01	1.31	0.67	27.42	0.42	22.27	1.79
C-02	2.77	1.43	134.13	0.88	34.37	4.35
D-01	2.28	1.17	110.59	0.73	28.34	3.64
D-02	2.28	1.17	110.59	0.73	28.34	3.64
AUX C-01	0.46	0.24	22.47	0.15	5.76	0.40
AUX D-01	0.46	0.24	22.47	0.15	5.76	0.40
Insignificant Activities*	less than 5.00	-	-	less than 5.00	-	0.11
PTE of the Entire Source	**14.57**	**4.93**	**427.66**	**8.04**	**124.83**	**14.42**
Title V Major Source Thresholds	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

*This is an estimate of emissions from blowdown activities and fugitive VOC from equipment leaks.

Table 3. Facility-Wide Greenhouse Gas Emissions Potential to Emit

Emission Unit	**Greenhouse Gas Emissions (CO_2 equivalent metric tons)**
C-01	23,225
C-02	49,059
D-01	40,434
D-02	40,434
AUX C-01	8,215
AUX D-01	8,215
Total	**169,583**

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.

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b. **Local Air Quality and Attainment Status**

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

3. Inapplicable Requirements

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

On July 6, 2006, standards of performance for stationary combustion turbines (40 CFR §§ 60.4300-60.4420) were promulgated. This subpart applies to stationary combustion turbines that commence construction, modification, or reconstruction after February 18, 2005. This subpart does not apply to turbines located at EPNG Navajo because they were both installed prior to February 18, 2005 and have 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 that recover sulfur from the acid gas (consisting of H_2S and CO_2) removed from sour natural gas by a sweetening unit. There are no sweetening units or sulfur recovery units located at EPNG Navajo; therefore, this subpart does not apply.

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

These regulations apply to compressors and other equipment at onshore natural gas processing facilities. As defined in this subpart, a natural gas processing plant is any processing site engaged in the extraction of natural gas liquids (NGLs) from field gas, fractionation of mixed NGLs to natural gas products, or both. NGLs are defined as the hydrocarbons, such as ethane, propane, butane, and pentane that are extracted from field gas. EPNG Navajo 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.

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

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

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

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

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

These regulations apply to storage vessels with capacities greater than or equal to 75 cubic meters (471 bbl). There is no storage tank with a capacity greater than 75 cubic meters located on-site at EPNG Navajo. The largest tank at the source, T-01, has a storage capacity of 31.8 cubic meters. Therefore, Subpart Kb 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. There are no ICE located at EPNG Navajo; therefore, subpart IIII does not apply.

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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. There are no SI ICE located at EPNG Navajo; therefore, subpart JJJJ does not apply.

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

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

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

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

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

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

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

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

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

These regulations establish emission and operating limitations for hazardous air pollutant (HAP) emissions from existing, new, or reconstructed stationary combustion turbines located at major sources of HAP emissions as well as compliance requirements related to such limitations. A major source of HAP emissions is a source that emits or has the potential to emit 10 tpy of a single HAP or 25 tpy of a combination of HAPs. Under 40 CFR § 63.6090(b)(4), existing stationary combustion turbines that commenced construction or reconstruction on or before January 14, 2003 do not have to meet the requirements of this subpart. EPNG Navajo is an area source of HAP emissions and turbines C-01, C-02, D-01, D-02, AUX C-01 and AUX D-01 at the facility were constructed before January 14, 2003. Therefore, the turbines located at the facility are not subject to subpart YYYY.

n. NESHAP for Reciprocating Internal Combustion Engine (40 CFR §§ 63.6580 – 63.6675, Subpart ZZZZ)

This rule establishes national emission limitations and operating limitations for HAPs emitted from stationary spark ignition internal combustion engines (SI ICE) and stationary compression ignition internal combustion engines (CI ICE). There are no engines located at this source, therefore subpart ZZZZ does not apply.

o. Acid Rain Program (40 CFR §§ 72 – 78)

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

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p. **Compliance Assurance Monitoring (CAM) Program (40 CFR § 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.

Pursuant to the PSD Permit AZP 90-2 Condition IX.B, emission unit C-01 operates a Dry Low-NOx Combustor for control of NOx emissions. A Dry Low-NOx Combustor is not considered a control device as defined in 40 CFR § 64.1 because it acts as a passive control measure to prevent pollutants from forming. CAM does not apply to turbine C-01 because the part 71 permit incorporates the PSD permit AZP 90-2 condition IX.E use of a continuous emission monitoring system (CEMS) as a compliance determination method in Condition II.A of this permit. 40 CFR § 64.2(b)(1)(vi) exempts emission limits from triggering CAM if the Title V permit requires a continuous compliance determination method". A CEMS meets the definition of this term. Therefore, turbine C-01 is exempt from CAM requirement for NOx and CO.

The emission units C-02, D-01, D-02, AUX C-01 and AUX D-01 do not operate a control device (as the term is defined in 40 CFR § 64.1), thus CAM does not apply to any emission units at EPNG Navajo. Therefore, pursuant to 40 CFR § 64.2, the requirements of 40 CFR Part 64 are not applicable.

4. Applicable Requirements

The following requirements apply to the Navajo compressor station.

Table 4. Summary of Applicable Federal Requirements.

Applicable Requirement	Emission Point/Unit
Federal Air Quality Requirement	C-01, C-02, D-01, D-02, AUX C-01, AUX D-01
PSD permit No. AZP 90-2	C-01
NSPS Subpart A (General Provisions)	C-01, C-02, D-01, D-02, AUX C-01, AUX D-01
NSPS Subpart GG (Gas Turbines)	C-01, C-02, D-01, D-02, AUX C-01, AUXD-01
Asbestos NESHAP (40 CFR 61, Subpart M)	Facility Wide
Protection of Stratospheric Ozone (40 CFR Part 82)	Facility Wide

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a. **Prevention of Significant Deterioration (PSD)**

The EPNG Navajo compressor station is not one of the 28 source categories defined in 40 CFR § 52.21(b)(1)(i)(a) but has the potential to emit more than 250 tons per year of NOx under 40 CFR § 52.21(b)(1)(i)(b). Therefore, this source is an existing major stationary source and is subject to PSD requirements for any major modification that will result in a significant emission increase pursuant to 40 CFR 52.21(a)(2).

On October 25, 1991 EPA issued PSD Permit NO. AZP 90-2 to EPNG for the installation and operation of one Solar Centaur H gas transmission turbine. Pursuant to the Consent Decree CIV 93-0920PHXCAM, all the conditions contained in the PSD Permit for the installation of the Solar Centaur H applies to unit C-01.

On May 16, 2000, US EPA issued a modification to the original PSD permit (AZP 90-2) to remove Special Conditions IX.E.1.c and IX.F.

The following conditions are included from the PSD permit:

i. The permittee shall install, and continuously operate for control of NOx emissions, a Dry Low-NOx Combustor. [PSD Permit AZP 90-2 Condition IX.B]

ii. The permittee shall conduct performance tests for NOx and CO on an annual basis and at the maximum operating capacity of the facility being tested. [PSD Permit AZP 90-2 Condition IX.C.1.a]

iii. The permittee shall not discharge or cause the discharge into the atmosphere NOx (as NO_2) in excess of the more stringent of 6.26 lb/hr or 42 ppmvd of NOx at 15% O_2 (3-hour rolling average, at ISO conditions) from the stack venting the combustion unit. [PSD Permit AZP 90-2 Condition IX.D]

iv. The permittee shall not discharge or cause the discharge into the atmosphere CO in excess of the more stringent of 5.084 lb/hr or 50 ppmvd of CO at 15% O_2 (3-hour rolling average, at ISO conditions) from the stack venting the combustion unit. [PSD Permit AZP 90-2 Condition IX.D]

v. The permittee shall not discharge or cause the discharge into the atmosphere any gases with opacity in excess of 10% (six-minute rolling average) from stack venting the combustion unit. [PSD Permit AZP 90-2 Condition IX.D]

vi. The permittee shall install, maintain and operate continuous monitoring system to measure stack gas NOx, CO and O_2 in the stack venting combustion unit. [PSD Permit AZP 90-2 Condition IX.E.1.a]

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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 are six natural gas-fired turbines, C-01, C-02, D-01, D-02, AUX C-01 and AUX D-01, at EPNG Navajo.

i. Streamlining NOx Emission Limits

Emission unit C-01 is an existing stationary gas turbine with a heat input at peak load greater than 10 MMBtu/hr and was constructed in 1993 after the applicability date of NSPS, Subpart GG. Pursuant to 40 CFR §§ 60.330 and 60.332(c), the permittee shall comply with the NOx emission limit for unit C-01. Pursuant to 40 CFR § 60.332(a)(2), NOx limit from turbine C-01 is 170 ppm. The NOx emission limit required by Subpart GG was calculated using actual measured heat rate based on lower heating value of fuel as measured at actual peak load at ambient temperature of 40°F during the performance testing conducted on April 19, 2010.

In addition, compliance with the PSD BACT limit of 6.26 lb/hr or 42 ppmvd NOx at 15% O2 (3-hour rolling average, ISO conditions), which was established in PSD Permit AZP 90-2, ensures compliance with the NOx emission limit in 40 CFR 60.332(a) for turbine C-01. This limit is equivalent to 0.0042 percent by volume, which is less than the maximum allowable NOx emission concentration of 0.0170 percent by volume (4- hour rolling average, ISO condition) required under the NSPS Subpart GG.

Both the PSD permit and the NSPS General Provisions require that an additional source test be conducted within 60 days after achieving the maximum production rate of the affected emission units, but no later than 180 days after the initial startup of the equipment. The NSPS does not require any on-going performance testing for NOx. The PSD permit requires the facility to maintain and operate a CEMS, and to conduct an annual performance test for NOx. Thus, the monitoring associated with the streamlined emission limit is more stringent than the monitoring required by the subsumed NSPS emission limit, and will be retained in the Title V permit.

ii. Pursuant to 40 CFR § 60.332(l), emission units C-02, D-01, and D-02 are exempt from the NOx emission limitation standards because these units are classified as regenerative cycle gas turbines with a heat input less than 107.2 gigajoules per hour (100 million Btu/hour).

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iii. The manufactured date of emission units AUX C-01 and AUX D-01 predate the October 3, 1977 effective date of the NSPS for the turbines. These units are exempt from the NOx emission limitation in accordance with 40 CFR § 60.332(e), because they were manufactured prior to October 3, 1982. The original build date for AUX C-01 is June 29, 1971 and for AUX D-01 is January 28, 1972.

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

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

c. Asbestos NESHAP (40 CFR § 61, Subpart M)

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

d. Stratospheric Ozone Protection (40 CFR § 82)

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

Table 5. Incorporation of Applicable Requirements into the Part 71 Permit

Requirement	Condition/ Section	Condition in Pt. 71 Permit	Description/Notes
PSD permit AZP 90-2	I	n/a	Permit expiration
	II	n/a	Notification of commencement of construction and operation (one-time only)
	III	II.A.14	Facility operation
	IV	II.A.15	Notification of malfunction
	V	IV.N	Right of entry

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	VI	II.A.16	Transfer of ownership
	VII	IV.F	Severability
	VIII	II.A.17	Other applicable regulations
	IX.A	n/a	certification of installation of low-NOx combustor, CEMS (one-time only)
	IX.A	II.C	40 CFR 60 Subpart GG requirements
	IX.B	II.A.4	operating low-NOx combustor
	IX.C.1.a	II.A.5	turbine performance test (turbine C-01)
	IX.C.1.b	II.A.5	turbine performance test (low-NOx combustor on turbine C-01)
	IX.C.2	II.A.6	performance test methods for NOx, CO
	IX.C.2	II.A.7	30 day notification
	IX.C.3	II.A.8	access to sampling ports
	IX.D	n/a	NOx limit for turbine C-01 before installation of low-NOx burner
	IX.D	II.A.1	NOx limit for turbine C-01, for low NOx burner
	IX.D	II.A.2	CO limit for turbine C-01
	IX.D	II.A.3	opacity limit for turbine C-01
	IX.D	n/a	revision of NOx and CO emission rates (time frame for revision is over)
	IX.D	n/a	disallowance of offset generation (BACT limits will not be revised)
	IX.E.1.a	II.A.9.a	operation of CEMS for NOx, CO
	IX.E.1.b	II.A.9.b	stack gas volumetric flow rate
	IX.E.1.c	n/a	permit amendment (condition deleted)
	IX.E.2	n/a	notification of CEMS installation (one-time only)
	IX.E.2	II.A.10	alternative to CEMS
	IX.E.3	II.A.13	excess emissions reporting
	IX.E.6	II.A.11	maintain quality assurance for CEMS
	IX.E.7	II.A.12	recordkeeping requirements
	IX.F	n/a	permit amendment (condition deleted)
	section X	II.A-II.C	Agency notifications
40 CFR Part 60 NSPS Subpart A	60.1	n/a	Applicability (no requirements)
	60.2	n/a	Definitions (no requirements)

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	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)	n/a	Notification of construction or reconstruction (one-time only)
	60.7(b)	II.B.2	Records of startup, shutdown, and malfunction
	60.7(c)	n/a	CEMS reporting (facility has CEMS, but this is not required by NSPS)
	60.7(d)	n/a	Report format for CEMS reporting (facility has CEMS, but is not required by NSPS)
	60.7(e)	n/a	Reporting frequency (standard does not require reporting more than semiannually)
	60.7(f)	n/a	Maintain monitoring records (PSD permit requires 5 years)
	60.7(g)	n/a	Notification required by state/local agency (no such notification required)
	60.7(h)	n/a	Disclaimer that subpart may clarify or make inapplicable any general provisions
	60.8	n/a	Initial performance tests (one-time only)
	60.9	II.B.3	Availability of information
	60.10	n/a	State authority (no requirements)
	60.11(a)	II.B.4	Compliance with non-opacity standards
	60.11(b)	n/a	Compliance with opacity standards (facility is not subject to opacity standard)
	60.11(c)	n/a	Times when opacity standards apply (facility is not subject to opacity standard)
	60.11(d)	II.B.5	Good practice to minimize emissions
	60.11(e)	n/a	Compliance with opacity standards (none)
	60.11(f)	n/a	Special provisions in subpart supersede general provisions (no requirements)
	60.11(g)	II.B.6	Credible evidence
	60.12	II.B.7	Circumvention
	60.13	n/a	CEMS requirements (facility has CEMS, but this is not required by NSPS)
	60.14	n/a	Applies to modifications

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	60.15	n/a	Applies to 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
40 CFR Part 60 NSPS Subpart GG	60.330	n/a	Applicability (no requirements)
	60.331	II.C.1	Definitions (gaseous fuel meets the definition of natural gas in § 60.331(u))
	60.332	n/a	standard for nitrogen oxides (PSD BACT NOx limit for unit C-01, 60.332(l) exempts unit C-02, D-01, D-02 since these units are classified as regenerative cycle turbines with heat input < 100 MMBtu/hr), and 60.332(e) exempts units AUX C-01and AUX D-01 from NOx standard
	60.333	II.C.1	Standard for sulfur oxides (fuel sulfur standard)
	60.334(a)	n/a	Monitoring of water, fuel for NOx control (the turbine does not use water injection to control NOx)
	60.334(b) & (c)	II.C.3- II.C.5	CEMS requirements
	60.334(d) through (g)	n/a	Monitoring of water, fuel for NOx control for turbines constructed after July 8, 2004 (the turbine does not use water injection and was constructed before 2004)
	60.334(h)	II.C.2	Monitoring of fuel sulfur content
	60.335	II.C.6-II.C.9	Test methods and procedures
Asbestos NESHAP 40 CFR Part 61 Subpart M	61.140 through 61.157	III.E	Requirements for demolition and renovation at facilities containing asbestos
Stratospheric Ozone Protection	82	III.D	Requirements for treatment of class I and class II substances

EPA promulgated a Federal Implementation Plan for preconstruction review of new and modified major sources in nonattainment areas and of new and modified 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

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that will be incorporated in Part 71 federal operating permits. EPNG Navajo 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

With one exception, the monitoring in the Title V permit is identical to the monitoring in the US EPA-issued PSD permit. The additional monitoring requirement included in the Title V permit comes from NSPS Subpart GG. Subpart GG was revised on July 8, 2004 and included changes to the monitoring requirements for sulfur content in fuel. The Title V permit monitoring is summarized below.

Table 6. Monitoring in the Title V Permit

Requirement	Requirement Condition #	Monitoring from Underlying Requirement	Monitoring Added to Part 71 Permit	Monitoring Condition #
Fuel Sulfur Content limit from gas turbines C-01, C-02, D-01, D-02, AUX C-01, and AUX D-01	II.C.1	Fuel sampling data or gas tariff certification that only natural gas is used	none	II.C.3
NOx limit from gas turbine C-01	II.A.1	CEMS & annual source test	none	II.A.5 & II.A.9
CO limit from gas turbine C-01	II.A.2	CEMS & annual source test	none	II.A.5 & II.A.9
Opacity Limit from gas turbine C-01	II.A.3		visible emissions /opacity test after 400 hours firing on fuel other than natural gas	II.C.10

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

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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 EPNG Navajo, NNEPA and US EPA in such determinations.

8. NNEPA Authority

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

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

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

9. Public Participation

a. <u>Public Notice</u>

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

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public notice requirements for permit actions and the public comment period are described in 40 C.F.R. § 71.11(d) and NNOPR § 403.

Public notice of this proposed permit action will be provided to EPNG Navajo, US EPA Region IX, and the affected state, local and tribal governments. A copy of the notice will also be provided to all persons who 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. <u>Response to Comments</u>

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 C-01
El Paso Natural Gas Company - Navajo Compressor Station
Section 24, Township 25-N, Range 24-E, 31 Miles North of Chambers, AZ

Heat Input Capacity MMBtu/hr	Max. Power Output hp	Hours of Operation hr
45.32	5,304	8,760

1. Potential to Emit of Criteria Pollutants

	Pollutant				
Emission Factor	PM_{10} 0.0066 (lbs/MMBtu)	SO_2 0.0034 (lbs/MMBtu)	NOx 6.26 (lb/hr)	VOC 0.0021 (lbs/MMBtu)	CO 5.08 (lb/hr)
PTE (tons/yr)	**1.3**	**0.7**	**27.4**	**0.4**	**22.3**

Methodology

PTE of PM_{10}, SO_2 and VOC (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs
PTE of NOx and CO (tons/yr) = Emission Factor (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Factor Basis:

Emission factor for NOx, and CO are from PSD-AZP 90-2 permit limit
Emission factor for VOC, SO_2 and PM_{10} are from AP-42 (4/00 version)

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**		**PTE of HAP (tons/yr)**
Formaldehyde	1.69E-02	(g/hp-hr)	8.66E-01
Acetaldehyde	1.73E-02	(g/hp-hr)	8.86E-01
1,3-Butadiene	4.30E-07	(lb/MMBtu)	8.54E-05
Acrolein	6.40E-06	(lb/MMBtu)	1.27E-03
Benzene	1.20E-05	(lb/MMBtu)	2.38E-03
Ethylbenzene	3.20E-05	(lb/MMBtu)	6.35E-03
Naphthalene	1.30E-06	(lb/MMBtu)	2.58E-04
PAH	2.20E-06	(lb/MMBtu)	4.37E-04
Propylene Oxide	2.90E-05	(lb/MMBtu)	5.76E-03
Toluene	1.30E-04	(lb/MMBtu)	2.58E-02
Xylene	6.40E-05	(lb/MMBtu)	1.27E-02
Total HAPs			**1.81**

Emission Factor Basis

Formaldehyde and Acetaldehyde : GRI-HAP Calc Version3.0 field test data
All others: AP-42 (4/00 version) Chapter 3.1, from Table 3.1-1 to 3.1-10

Emission Calculations
From one (1) NG Fired Turbine C-02
El Paso Natural Gas Company - Navajo Compressor Station
Section 24, Township 25-N, Range 24-E, 31 Miles North of Chambers, AZ

Heat Input Capacity MMBtu/hr	Max. Power Output hp	Hours of Operation hr
95.7	12,913	8,760

1. Potential to Emit of Criteria Pollutants

	Pollutant				
	PM_{10}	SO_2	NOx	VOC	CO
Emission Factor	0.0066 (lbs/MMBtu)	0.0034 (lbs/MMBtu)	0.320 (lbs/MMBtu)	0.0021 (lbs/MMBtu)	0.082 (lbs/MMBtu)
PTE (tons/yr)	**2.8**	**1.4**	**134.1**	**0.9**	**34.4**

Methodology
PTE of PM_{10}, SO_2, NOx, CO and VOC (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Factor Basis:
Emission factor for NOx, CO, VOC, SO2 and PM10 are from AP-42 (4/00 version)

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**		**PTE of HAP (tons/yr)**
Formaldehyde	1.69E-02	(g/hp-hr)	2.11E+00
Acetaldehyde	1.73E-02	(g/hp-hr)	2.16E+00
1,3-Butadiene	4.30E-07	(lb/MMBtu)	1.80E-04
Acrolein	6.40E-06	(lb/MMBtu)	2.68E-03
Benzene	1.20E-05	(lb/MMBtu)	5.03E-03
Ethylbenzene	3.20E-05	(lb/MMBtu)	1.34E-02
Naphthalene	1.30E-06	(lb/MMBtu)	5.45E-04
PAH	2.20E-06	(lb/MMBtu)	9.22E-04
Propylene Oxide	2.90E-05	(lb/MMBtu)	1.22E-02
Toluene	1.30E-04	(lb/MMBtu)	5.45E-02
Xylene	6.40E-05	(lb/MMBtu)	2.68E-02
Total HAPs			**4.38**

Emission Factor Basis
Formaldehyde and Acetaldehyde : GRI-HAP Calc Version3.0 field test data
All others: AP-42 (4/00 version) Chapter 3.1, from Table 3.1-1 to 3.1-10

Emission Calculations
From one (1) NG Fired Turbine D-01
El Paso Natural Gas Company - Navajo Compressor Station
Section 24, Township 25-N, Range 24-E, 31 Miles North of Chambers, AZ

Heat Input Capacity MMBtu/hr	Max. Power Output hp	Hours of Operation hr
78.9	10,784	8,760

1. Potential to Emit of Criteria Pollutants

	Pollutant				
	PM_{10}	SO_2	NOx	VOC	CO
Emission Factor	0.0066 (lbs/MMBtu)	0.0034 (lbs/MMBtu)	0.320 (lbs/MMBtu)	0.0021 (lbs/MMBtu)	0.082 (lbs/MMBtu)
PTE (tons/yr)	**2.3**	**1.2**	**110.6**	**0.7**	**28.3**

Methodology
PTE of PM_{10}, SO_2, NOx, CO and VOC (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Factor Basis:
Emission factor for NOx, CO, VOC, SO2 and PM10 are from AP-42 (4/00 version)

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**		**PTE of HAP (tons/yr)**
Formaldehyde	1.69E-02	(g/hp-hr)	1.76E+00
Acetaldehyde	1.73E-02	(g/hp-hr)	1.80E+00
1,3-Butadiene	4.30E-07	(lb/MMBtu)	1.49E-04
Acrolein	6.40E-06	(lb/MMBtu)	2.21E-03
Benzene	1.20E-05	(lb/MMBtu)	4.15E-03
Ethylbenzene	3.20E-05	(lb/MMBtu)	1.11E-02
Naphthalene	1.30E-06	(lb/MMBtu)	4.49E-04
PAH	2.20E-06	(lb/MMBtu)	7.60E-04
Propylene Oxide	2.90E-05	(lb/MMBtu)	1.00E-02
Toluene	1.30E-04	(lb/MMBtu)	4.49E-02
Xylene	6.40E-05	(lb/MMBtu)	2.21E-02
Total HAPs			**3.66**

Emission Factor Basis
Formaldehyde and Acetaldehyde : GRI-HAP Calc Version3.0 field test data
All others: AP-42 (4/00 version) Chapter 3.1, from Table 3.1-1 to 3.1-10

Emission Calculations
From one (1) NG Fired Turbine D-02
El Paso Natural Gas Company - Navajo Compressor Station
Section 24, Township 25-N, Range 24-E, 31 Miles North of Chambers, AZ

Heat Input Capacity MMBtu/hr	Max. Power Output hp	Hours of Operation hr
78.9	10,784	8,760

1. Potential to Emit of Criteria Pollutants

	Pollutant				
	PM_{10}	SO_2	NOx	VOC	CO
Emission Factor	0.0066 (lbs/MMBtu)	0.0034 (lbs/MMBtu)	0.320 (lbs/MMBtu)	0.0021 (lbs/MMBtu)	0.082 (lbs/MMBtu)
PTE (tons/yr)	**2.3**	**1.2**	**110.6**	**0.7**	**28.3**

Methodology
PTE of PM_{10}, SO_2, NOx, CO and VOC (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Factor Basis:
Emission factor for NOx, CO, VOC, SO2 and PM10 are from AP-42 (4/00 version)

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**		**PTE of HAP (tons/yr)**
Formaldehyde	1.69E-02	(g/hp-hr)	1.76E+00
Acetaldehyde	1.73E-02	(g/hp-hr)	1.80E+00
1,3-Butadiene	4.30E-07	(lb/MMBtu)	1.49E-04
Acrolein	6.40E-06	(lb/MMBtu)	2.21E-03
Benzene	1.20E-05	(lb/MMBtu)	4.15E-03
Ethylbenzene	3.20E-05	(lb/MMBtu)	1.11E-02
Naphthalene	1.30E-06	(lb/MMBtu)	4.49E-04
PAH	2.20E-06	(lb/MMBtu)	7.60E-04
Propylene Oxide	2.90E-05	(lb/MMBtu)	1.00E-02
Toluene	1.30E-04	(lb/MMBtu)	4.49E-02
Xylene	6.40E-05	(lb/MMBtu)	2.21E-02
Total HAPs			**3.66**

Emission Factor Basis
Formaldehyde and Acetaldehyde : GRI-HAP Calc Version3.0 field test data
All others: AP-42 (4/00 version) Chapter 3.1, from Table 3.1-1 to 3.1-10

Emission Calculations
From one (1) NG Fired Turbine AUX C-01
El Paso Natural Gas Company - Navajo Compressor Station
Section 24, Township 25-N, Range 24-E, 31 Miles North of Chambers, AZ

Heat Input Capacity MMBtu/hr	Max. Power Output hp	Hours of Operation hr
16.0	1,160	8,760

1. Potential to Emit of Criteria Pollutants

	Pollutant				
	PM_{10}	SO_2	NOx	VOC	CO
Emission Factor	0.0066 (lbs/MMBtu)	0.0034 (lbs/MMBtu)	0.320 (lbs/MMBtu)	0.0021 (lbs/MMBtu)	0.082 (lbs/MMBtu)
PTE (tons/yr)	**0.46**	**0.24**	**22.47**	**0.15**	**5.76**

Methodology
PTE of PM_{10}, SO_2, NOx, CO and VOC (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Factor Basis:
Emission factor for NOx, CO, VOC, SO2 and PM10 are from AP-42 (4/00 version)

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**		**PTE of HAP (tons/yr)**
Formaldehyde	1.69E-02	(g/hp-hr)	1.89E-01
Acetaldehyde	1.73E-02	(g/hp-hr)	1.94E-01
1,3-Butadiene	4.30E-07	(lb/MMBtu)	3.02E-05
Acrolein	6.40E-06	(lb/MMBtu)	4.49E-04
Benzene	1.20E-05	(lb/MMBtu)	8.43E-04
Ethylbenzene	3.20E-05	(lb/MMBtu)	2.25E-03
Naphthalene	1.30E-06	(lb/MMBtu)	9.13E-05
PAH	2.20E-06	(lb/MMBtu)	1.54E-04
Propylene Oxide	2.90E-05	(lb/MMBtu)	2.04E-03
Toluene	1.30E-04	(lb/MMBtu)	9.13E-03
Xylene	6.40E-05	(lb/MMBtu)	4.49E-03
Total HAPs			**0.40**

Emission Factor Basis
Formaldehyde and Acetaldehyde : GRI-HAP Calc Version3.0 field test data
All others: AP-42 (4/00 version) Chapter 3.1, from Table 3.1-1 to 3.1-10

Emission Calculations
From one (1) NG Fired Turbine AUX D-01
El Paso Natural Gas Company - Navajo Compressor Station
Section 24, Township 25-N, Range 24-E, 31 Miles North of Chambers, AZ

Heat Input Capacity MMBtu/hr	Max. Power Output hp	Hours of Operation hr
16.03	1,160	8,760

1. Potential to Emit of Criteria Pollutants

	Pollutant				
	PM_{10}	SO_2	NOx	VOC	CO
Emission Factor	0.0066 (lbs/MMBtu)	0.0034 (lbs/MMBtu)	0.320 (lbs/MMBtu)	0.0021 (lbs/MMBtu)	0.082 (lbs/MMBtu)
PTE (tons/yr)	**0.46**	**0.24**	**22.47**	**0.15**	**5.76**

Methodology
PTE of PM_{10}, SO_2, NOx, CO and VOC (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Emission Factor Basis:
Emission factor for NOx, CO, VOC, SO2 and PM10 are from AP-42 (4/00 version)

2. Potential to Emit HAPs

Pollutant	**Emission Factor (lbs/MMBtu)**		**PTE of HAP (tons/yr)**
Formaldehyde	1.69E-02	(g/hp-hr)	1.89E-01
Acetaldehyde	1.73E-02	(g/hp-hr)	1.94E-01
1,3-Butadiene	4.30E-07	(lb/MMBtu)	3.02E-05
Acrolein	6.40E-06	(lb/MMBtu)	4.49E-04
Benzene	1.20E-05	(lb/MMBtu)	8.43E-04
Ethylbenzene	3.20E-05	(lb/MMBtu)	2.25E-03
Naphthalene	1.30E-06	(lb/MMBtu)	9.13E-05
PAH	2.20E-06	(lb/MMBtu)	1.54E-04
Propylene Oxide	2.90E-05	(lb/MMBtu)	2.04E-03
Toluene	1.30E-04	(lb/MMBtu)	9.13E-03
Xylene	6.40E-05	(lb/MMBtu)	4.49E-03
Total HAPs			**0.40**

Emission Factor Basis
Formaldehyde and Acetaldehyde : GRI-HAP Calc Version3.0 field test data
All others: AP-42 (4/00 version) Chapter 3.1, from Table 3.1-1 to 3.1-10

Emission Calculations
Potential to Emit Greenhouse Gases
El Paso Natural Gas Company - Navajo Compressor Station
Section 24, Township 25-N, Range 24-E, 31 Miles North of Chambers, AZ

Emission Unit ID	Site Rating		Hours of Operation	Emission Factors (kg/MMBtu)			Global Warming Potentials		Emission Rate (lb/hr)				Emissions (tpy)			
	Hp	MMBtu/hr		CO_2	CH_4	N_2O	CH_4	N_2O	CO_2	CH_4	N_2O	CO_2e	CO_2	CH_4	N_2O	CO_2e
C-01	5,304	45.32	8,760	53.02	1.00E-03	1.00E-04	21	310	5,297	0.10	0.010	5,303	23,203	0.4	0.0	23,225
C-02	12,913	95.73	8,760	53.02	1.00E-03	1.00E-04	21	310	11,190	0.21	0.021	11,201	49,011	0.9	0.1	49,059
D-01	10,784	78.90	8,760	53.02	1.00E-03	1.00E-04	21	310	9,223	0.17	0.017	9,232	40,395	0.8	0.1	40,434
D-02	10,784	78.90	8,760	53.02	1.00E-03	1.00E-04	21	310	9,223	0.17	0.017	9,232	40,395	0.8	0.1	40,434
AUX C-01	1,160	16.03	8,760	53.02	1.00E-03	1.00E-04	21	310	1,874	0.04	0.004	1,876	8,207	0.2	0.0	8,215
AUX D-01	1,160	16.03	8,760	53.02	1.00E-03	1.00E-04	21	310	1,874	0.04	0.004	1,876	8,207	0.2	0.0	8,215
Total													**169,417**	**3**	**0.3**	**169,583**

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
El Paso Natural Gas Company - Navajo Compressor Station
Section 24, Township 25-N, Range 24-E, 31 Miles North of Chambers, AZ

Emission Units	PM_{10} (tons/yr)	SO_2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
C-01	1.31	0.67	27.42	0.42	22.27	1.81
C-02	2.77	1.43	134.13	0.88	34.37	4.38
D-01	2.28	1.17	110.59	0.73	28.34	3.66
D-02	2.28	1.17	110.59	0.73	28.34	3.66
AUX C-01	0.46	0.24	22.47	0.15	5.76	0.40
AUX D-01	0.46	0.24	22.47	0.15	5.76	0.40
Insignificant Activities *	5.00			5.00		0.11
Total PTE	**14.57**	**4.93**	**427.66**	**8.04**	**124.83**	**14.42**