

ENVIRON

September 11, 2008

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AIR PERMITS SECTION
6PD-R

Jeff Robinson, Chief
Air Permits Section
Multimedia Planning and Permitting Division
U.S. Environmental Protection Agency - Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: **Application for Renewal of Federal Title V Operating Permit
Laguna Compressor Station - El Paso Natural Gas Company**

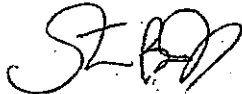
Dear Mr. Robinson:

In accordance with 40 CFR Part 71, on behalf of El Paso Natural Gas Company (EPNG), I am submitting the Federal operating permit application renewal package for EPNG's Laguna Compressor Station, located on the Laguna-Pueblo Reservation (Cibola County, New Mexico).

To the best of our knowledge, we believe that the attached application fully addresses the information requested in each package element as described in the operating permit application package instructions and the standard operating permit application forms.

Should you have any questions regarding the enclosed application, or need additional information, please feel free to contact me at (510) 420-2540 or contact Leslie Nolting of EPNG at (719) 520-4652. Thank you for your time and consideration.

Sincerely,



Steven Branoff
Manager

Cc: Leslie Nolting, EPNG
Richard Duarte, EPNG

Enclosures



**40 CFR Part 71
Federal Title V Operating Permit
Renewal Application**

Laguna Compressor Station

Laguna Pueblo, Cibola County, New Mexico

Submitted to:

**Operating Permit Section
Air, Pesticides & Toxics Division
U.S. Environmental Protection Agency – Region 6
First Interstate Bank Tower at Fountain Place
1445 Ross Avenue
Dallas, TX 75202-2733**

Submitted by:

**El Paso Natural Gas Company
2 North Nevada Avenue
Colorado Springs, CO 80903**

September 2008

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PERMIT APPLICATION FORMS

**40 CFR PART 71
FEDERAL OPERATING PERMITS PROGRAM**

**US EPA
APRIL 2008**



OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)**A. Mailing Address and Contact Information**

Facility name Laguna Compressor Station

Mailing address: Street or P.O. Box 3801 Atrisco Blvd, NW

City Albuquerque State NM ZIP 87120 - _____

Contact person: Richard Duarte Title Principal Environmental Representative

Telephone (505) 831 - 7763 Ext. _____

Facsimile (505) 831 - 7739

B. Facility Location

Temporary source? Yes No Plant site location NW 1/4, SE 1/4 Section 24, Township 9-N, Range 5-W

City 5 miles SE of Laguna Pueblo State NM County Cibola EPA Region 6

Is the facility located within:

Indian lands? YES NO OCS waters? YES NO

Non-attainment area? YES NO If yes, for what air pollutants? NA

Within 50 miles of affected State? YES NO If yes, What State(s)? NM, Albuquerque/Bernalillo Co.

C. Owner

Name El Paso Natural Gas Company (EPNG) Street/P.O. Box 2 North Nevada Avenue

City Colorado Springs State CO ZIP 80903 - _____

Telephone (719) 520 - 4350 Ext _____

D. Operator

Name El Paso Natural Gas Company (EPNG) Street/P.O. Box 2 North Nevada Avenue

City Colorado Springs State CO ZIP 80903 - _____

Telephone (719) 520 - 4350 Ext _____

E. Application Type

Mark only one permit application type and answer the supplementary question appropriate for the type marked.

Initial Permit Renewal Significant Mod Minor Permit Mod(MPM)

Group Processing, MPM Administrative Amendment

For initial permits, when did operations commence? ____ / ____ / ____

For permit renewal, what is the expiration date of current permit? 3 / 16 / 09

F. Applicable Requirement Summary

Mark all types of applicable requirements that apply.

SIP FIP/TIP PSD Non-attainment NSR

Minor source NSR Section 111 Phase I acid rain Phase II acid rain

Stratospheric ozone OCS regulations NESHAP Sec. 112(d) MACT

Sec. 112(g) MACT Early reduction of HAP Sec 112(j) MACT RMP [Sec.112(r)]

Tank Vessel requirements, sec. 183(f) Section 129 Standards/Requirement

Consumer / comm.. products, 183(e) NAAQS, increments or visibility (temp. sources)

Has a risk management plan been registered? YES NO Regulatory agency NA

Phase II acid rain application submitted? YES NO If yes, Permitting authority NA

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

NA

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Natural gas compression and transmission	Pipeline quality natural gas	4922

I. Emission Unit Identification

Assign an emissions unit ID and describe each emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should be listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
A-01	Natural gas-fired engine, Clark TLA-10
A-02	Natural gas-fired engine, Clark TLA-10
A-03	Natural gas-fired engine, Clark TLA-10
AUX A-01	Natural gas-fired engine for power generation (auxiliary), Ingersoll-Rand PSVG-8
AUX A-02	Natural gas-fired engine for power generation (auxiliary), Ingersoll-Rand PSVG-8

J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

NOx	<u>2121.6</u>	tons/yr	VOC	<u>89.4</u>	tons/yr	SO2	<u>7.0</u>	tons/yr
PM-10	<u>22.4</u>	tons/yr	CO	<u>722.1</u>	tons/yr	Lead	<u>0</u>	tons/yr
Total HAP	<u>36.0</u>	tons/yr						
Single HAP emitted in the greatest amount	<u>Formaldehyde</u>					PTE	<u>24.5</u>	tons/yr
Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE							<u>NA</u>	tons/yr

K. Existing Federally-Enforceable Permits

Permit number(s)	<u>R6FOPP71-02</u>	Permit type	<u>Title V Operating Permit</u>	Permitting authority	<u>EPA Region 6</u>
Permit number(s)	_____	Permit type	_____	Permitting authority	_____

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit	<u>NA</u>		
Check one:	<input type="checkbox"/> Application made	<input type="checkbox"/> Coverage granted	
General permit identifier	_____	Expiration Date	<u> </u> / <u> </u> / <u> </u>

M. Cross-referenced Information

Does this application cross-reference information?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	(If yes, see instructions)
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OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID A-01 Description Natural gas-fired engine
 SIC Code (4-digit) 4922 SCC Code 2-02-002-52

B. Emissions Unit Description

Primary use Natural gas compression Temporary Source Yes No
 Manufacturer Clark Model No. TLA-10
 Serial Number 79007 Installation Date 01 / / 1958
 Boiler Type: Industrial boiler Process burner Electric utility boiler
 Other (describe) _____
 Boiler horsepower rating NA Boiler steam flow (lb/hr) NA
 Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
 Actual Heat Input 33.26 MM BTU/hr Max. Design Heat Input 33.26 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) _____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline quality natural gas	<0.016%	NA	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline quality natural gas	109.4 MMSCF (2007)	36,500 SCF (LHV)	319.5 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date ____/____/____ Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp(°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID A-02 Description Natural gas-fired engine
 SIC Code (4-digit) 4922 SCC Code 2-02-002-52

B. Emissions Unit Description

Primary use Natural gas compression Temporary Source Yes No
 Manufacturer Clark Model No. TLA-10
 Serial Number 79008 Installation Date 01 / / 1958
 Boiler Type: Industrial boiler Process burner Electric utility boiler
 Other (describe) _____
 Boiler horsepower rating NA Boiler steam flow (lb/hr) NA
 Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
 Actual Heat Input 33.26 MM BTU/hr Max. Design Heat Input 33.26 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) _____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline quality natural gas	<0.016%	NA	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline quality natural gas	115.3 MMSCF (2007)	36,500 SCF (LHV)	319.5 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date / / Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp(°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID A-03 Description Natural gas-fired engine
 SIC Code (4-digit) 4922 SCC Code 2-02-002-52

B. Emissions Unit Description

Primary use Natural gas compression Temporary Source Yes No
 Manufacturer Clark Model No. TLA-10
 Serial Number 79005 Installation Date 01 / / 1958
 Boiler Type: Industrial boiler Process burner Electric utility boiler
 Other (describe) _____
 Boiler horsepower rating NA Boiler steam flow (lb/hr) NA
 Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
 Actual Heat Input 33.26 MM BTU/hr Max. Design Heat Input 33.26 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) _____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline quality natural gas	<0.016%	NA	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline quality natural gas	88.8 MMSCF (2007)	36,500 SCF (LHV)	319.5 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date ____/____/____ Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp(°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID AUX A-01 Description Natural gas-fired engine

SIC Code (4-digit) 4922 SCC Code 2-02-002-53

B. Emissions Unit Description

Primary use Power generation (auxiliary) Temporary Source Yes No

Manufacturer Ingersoll-Rand Model No. PSVG-8

Serial Number 8CPST227 Installation Date 09 / / 1958

Boiler Type: Industrial boiler Process burner Electric utility boiler

Other (describe) _____

Boiler horsepower rating NA Boiler steam flow (lb/hr) NA

Type of Fuel-Burning Equipment (coal burning only):

Hand fired Spreader stoker Underfeed stoker Overfeed stoker

Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed

Actual Heat Input 8.13 MM BTU/hr Max. Design Heat Input 8.13 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) _____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline quality natural gas	<0.016%	NA	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline quality natural gas	29.2 MMSCF (2007)	8,914 SCF (LHV)	78.1 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date ____ / ____ / ____ Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp(°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID AUX A-02 Description Natural gas-fired engine
 SIC Code (4-digit) 4922 SCC Code 2-02-002-53

B. Emissions Unit Description

Primary use Power generation (auxiliary) Temporary Source Yes No
 Manufacturer Ingersoll-Rand Model No. PSVG-8
 Serial Number 8CPST227 Installation Date 09 / / 1958
 Boiler Type: Industrial boiler Process burner Electric utility boiler
 Other (describe) _____
 Boiler horsepower rating NA Boiler steam flow (lb/hr) NA
 Type of Fuel-Burning Equipment (coal burning only):
 Hand fired Spreader stoker Underfeed stoker Overfeed stoker
 Traveling grate Shaking grate Pulverized, wet bed Pulverized, dry bed
 Actual Heat Input 8.13 MM BTU/hr Max. Design Heat Input 8.13 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural gas Standby fuel type(s) _____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline quality natural gas	<0.016%	NA	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline quality natural gas	9.5 MMSCF (2007)	8,914 SCF (LHV)	78.1 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID NA Device type _____

Air pollutant(s) Controlled _____ Manufacturer _____

Model No. _____ Serial No. _____

Installation date ____/____/____ Control efficiency (%) _____

Efficiency estimation method _____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) _____ Inside stack diameter (ft) _____

Stack temp(°F) _____ Design stack flow rate (ACFM) _____

Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____



Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID SEE NOTE BELOW

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
NOx		484.36	2,121.6	
VOC		20.44	89.4	
SO2		1.63	7.0	
PM10		5.13	22.4	
CO		164.83	722.1	
HAP		8.22	36.0	



OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)

POTENTIAL TO EMIT (PTE)

For each unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below and sum them up to show totals for the facility. You may find it helpful to complete form **EMISS** before completing this form. Show other pollutants not listed that are present in major amounts at the facility on attachment in a similar fashion. You may round values to the nearest tenth of a ton. Also report facility totals in section **J** of form **GIS**.

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
A-01	611.4	25.6	2.0	7.0	141.3	0.0	11.6
A-02	611.4	25.6	2.0	7.0	141.3	0.0	11.6
A-03	611.4	25.6	2.0	7.0	141.3	0.0	11.6
AUX A-01	143.7	6.3	0.5	0.7	149.1	0.0	0.6
AUX A-02	143.7	6.3	0.5	0.7	149.1	0.0	0.6
FACILITY TOTALS	2,121.6	89.4	7.0	22.4	722.1	0.0	36.0



Federal Operating Permit Program (40 CFR Part 71)

INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

Complete this section for each unique combination of applicable requirements and emissions units at the facility. List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Indicate your compliance status at this time for this requirement and compliance methods and check "YES" or "NO" to the follow-up question.

Emission Unit ID(s): A-01, A-02, A-03, AUX A-01, AUX A-02

Applicable Requirement (Describe and Cite): 1.2 Source Emission Points -Table 1: Emission Units and Control Devices

Compliance Methods for the Above (Description and Citation): No information needed to be corrected or changed as reviewed by R. Duarte on February 21, 2008.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): A-01, A-02, A-03, AUX A-01, AUX A-02

Applicable Requirement (Description and Citation): 1.2 Source Emission Points - Table 2: Potential to Emit in Tons per Year (tpy)

Compliance Methods for the Above (Description and Citation): No information needed to be corrected or changed as reviewed by R. Duarte on February 21, 2008.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 2. Permit Shield [40 CFR 71.6(f)]

- 2.1. Nothing in this permit shall alter or affect the following:
 - 2.1.1. The provisions of Section 303 of the CAA (emergency orders), including the authority of the Administrator under that section.
 - 2.1.2. The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - 2.1.3. The ability of the EPA to obtain information from a source under Section 114 of the CAA or;
- 2.2. Compliance with the terms and conditions of this permit shall be deemed in compliance with the applicable requirements specifically listed in this permit as of the date of permit issuance.

Compliance Methods for the Above (Description and Citation): This condition does not impose any specific action by EPNG for this ACC.

Compliance Status:

- In Compliance: Will you continue to comply up to permit issuance? Yes No
- Not In Compliance: Will you be in compliance at permit issuance? Yes No
- Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 3. Facility Wide Permit Conditions

Conditions in this section apply to all emissions units located at the facility, including any units not specifically listed in Table 1.

- 3.1. There is no air pollution control equipment installed at this facility.
- 3.2. The permittee shall keep records of repair and maintenance activities performed on emission units. These records shall identify the relevant emission unit and describe the work performed.
- 3.3. The permittee shall keep records of the serial numbers for each emission unit. The emission units and their serial numbers are: A-01 79007; A-02 with serial number 79008; A-03 with serial number 79005; AUX A-01 with serial number 8CPST227 and AUX A-02 with serial number 8CPST228. A change in serial number should also be reflected in the report. See 3.5.
- 3.4. Retention of these records and support information shall be for a period of at least five years from the date of measurement, or report. Support information includes all calibration and maintenance records, all original strip-chart recordings or monitoring instrumentation, and copies of all reports required by this permit.
- 3.5. The permittee shall submit to the EPA reports of any monitoring and recording keeping required under this permit semi-annually by April 1 and October 1 of each year. The report due on April 1 shall cover the prior six-month period from September 1 through the end of February. The report due on October 1 shall cover the prior six-month period from March 1 through the end of August.

Copies of these records shall also be sent to:
 Environmental Director
 Pueblo of Laguna
 P.O. Box 194
 Laguna, NM 87026

Compliance Methods for the Above (Description and Citation): For 3.1, there are no recordkeeping or monitoring records to review for this ACC; For, 3.2, the repair and maintenance records of significant operation and maintenance activities were reviewed by R. Duarte on February 21, 2008 at the Gallup Area Office. Also, copies of these records have been included with the 6-month monitoring reports. For 3.3, R. Duarte reviewed the page listing the serial numbers for each engine and nothing has changed. This page is also included within the 6-month reports. For 3.4, on February 21, 2008, R. Duarte reviewed the files stored at the Gallup Area Office in Gallup, NM. The files included all of the records required by this section. For 3.5, the two previous reports that were submitted during this period were sent on September 28, 2007 [USPS Certified Mail #7006 3450 0002 6146 0143] and March 19, 2007 [USPS Certified Mail #7005 1820 0002 7153 2931]. And copies were sent to the Pueblo of Laguna Environmental Director.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 4. Additional Requirements to be Implemented in Future Activities Under the Permit

To minimize the likelihood of adverse impacts to all species protected under the Endangered Species Act (ESA), biological surveys will be done in accordance with the applicable ESA regulations prior to any major construction activities during the general migratory bird nesting season of March through August to ensure that no occupied nests are present in the proposed work area.

Because it is "grandfathered," the facility is not required to obtain a construction permit for its current activities. If the facility undertakes construction activities in the future, EPA will reinstate consultation with the Fish and Wildlife Service, in order to address EPA issues before issuance of a permit. The permittee must submit an application for modification of the permit as discussed in section 5.8 through section 5.11. A list of the endangered, threatened, and candidate species, and Species of Concern is included for Cibola County at Appendix A.

The nearest known population of Pecos sunflowers to the subject facility is near Grants, New Mexico. Construction to the existing facility is unlikely to affect the Pecos sunflower due to its distance from the Compressor Station.

Compliance Methods for the Above (Description and Citation): There were no modification or construction activities within the Laguna Compressor Station during this reporting period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5. Title V Administrative Requirements

5.1. Annual Fee Payment [40 CFR §§ 71.6(a)(7) and 71.9]

5.1.1 The permittee shall pay an annual permit fee in accordance with the procedures outlined below.

5.1.2 The permittee shall pay the annual permit fee each year:
The fee shall be received no later than July 20th of each year.

5.1.3 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 EPA.

5.1.4 The permittee shall send fee payment and a completed fee filing form to:
EPA Region 6
P.O. Box 360582M
Pittsburgh, PA 15251

Compliance Methods for the Above (Description and Citation): As reviewed by R. Duarte on September 4, 2008, the payment for the 2007 fee was received by EPA Region 6 on July 18, 2008. Check #07565835 in the amount of \$19,894.56. Per an email from Ms. Catherine Penland of EPA dated March 11, 2008, the payment was sent to a lockbox address rather than the address listed in the permit.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5. Title V Administrative Requirements

5.1. Annual Fee Payment [40 CFR §§ 71.6(a)(7) and 71.9]

5.1.5. The permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in Section 5.5. of this permit.

5.1.6. Basis for calculating annual fee:

5.1.6.1. The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the emissions fee (in dollars/ton) in effect at the time of .

calculation.

- 5.1.6.1.1. "Actual emissions" means the actual rate of emissions in tons per year of any regulated pollutant (for fee calculation) emitted from a part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.
- 5.1.6.1.2. If actual emissions cannot be determined using the compliance methods in the permit, the permittee shall use other federally recognized procedures.
- 5.1.6.1.3. The term "regulated pollutant (for fee calculation)" is defined in § 71.2.
- 5.1.6.1.4. The permittee should note that the presumptive fee amount is revised each calendar year to account for inflation, and it is available from EPA prior to the start of each calendar year.
- 5.1.6.2. The permittee shall exclude the following emissions from the calculation of fees:
- 5.1.6.2.1. The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tons per year.
- 5.1.6.2.2. Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation.
- 5.1.6.2.3. The insignificant quantities of actual emissions not required to be listed or calculated in a permit application pursuant to § 71.5(c)(11).
- 5.1.7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official in accordance with § 71.5(d).
- 5.1.8. The permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee for five years following submittal of fee payment. Emission-related data include, for example, emissions-related forms provided by EPA and used by the permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with § 71.6(a)(3)(ii).
- 5.1.9. Failure of the permittee to pay fees in a timely manner shall subject the permittee to assessment of penalties and interest in accordance with § 71.9(1).
- 5.1.10. The EPA will not act on applications for permit renewal or modification if the permittee fails to pay all fees, interest, and penalties owed in full.
- 5.1.11. When notified by EPA of underpayment of fees, the permittee shall remit full payment within 30 days of receipt of notification.
- 5.1.12. If the permittee thinks that the EPA-assessed fee is in error and wishes to challenge the fee, the permittee shall provide written explanation of the alleged error to EPA along with full payment of the assessed fee.

Compliance Methods for the Above (Description and Citation): As reviewed by R. Duarte on September 4, 2008, the proper calculation forms were received by EPA on July 18, 2008. There were no notices for underpayment sent by the USEPA Region 6 during this reporting period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.2. Blanket Compliance Statement [40 CFR §§ 71.6(a)(6)(i) and (ii)]

5.2.1. The permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance, including: 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 this part constitutes a violation of the 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.

5.2.2. 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 of this permit; other credible evidence must be considered in such determinations.

Compliance Methods for the Above (Description and Citation): R. Duarte checked records and files to see that EPNG continues to comply with all of its applicable requirements. There were no alleged, known or potential deviations during this reporting period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.3 Compliance Certifications [40 CFR § 71.6(c)(5)]

The permittee shall submit to EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, annually each year no later than April 1. The compliance certification shall cover the same 12 month period as the two consecutive semi-annual monitoring reports. The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with § 71.5(d).

5.3.1. The certification shall include the following:

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

5.3.1.2. Identification of the method(s) or other means used for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. If necessary, the owner or operator also shall identify any other material information, e.g., operating hours records, that must be included in the certification to comply with section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information.

- 5.3.1.3. 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.
- 5.3.1.4. Any other requirements sufficient to assure or determine compliance, consistent with section 71.6(c)(5)(iii)(D) and section 71.6(c)(6).

Compliance Methods for the Above (Description and Citation): On February 21, 2008, R. Duarte checked the records at Gallup Area Office to see if EPNG had submitted the previous Compliance Certification for the Laguna before April 1. The previous ACC was transmitted on March 19, 2007 [USPS certified mail #7005 1820 0002 7153 2931]. The Notice to conduct NESHAP - MACT Initial Emission Performance Test and conduct and initial CMS Performance Evaluation as required by 40 CFR 63.8(e)(2) and 63.7(b)(1) was submitted on August 3, 2007. The Notification of Compliance Status per NESHAP 40 CFR 63.6630(c) and 63.6645(f) were transmitted on December 6, 2007 for AUX-01 and January 11, 2008 for AUX-02. The first compliance report per NESHAP- 40 CFR 63.6650(b)(1) was transmitted on January 29, 2008 for both AUX-01 and AUX-02.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.4. Duty to Provide and Supplement information [40 CFR §§ 71.6(a)(6)(v) and 71.5(b)]

The permittee shall furnish to EPA, within a time specified by EPA, any information that EPA 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 EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. 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 that incorrect information was submitted in the permit application, shall promptly submit such supplemental facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after this permit is issued.

Compliance Methods for the Above (Description and Citation): There were no informational requests during this reporting period. EPNG believes that information submitted in the most recent permit application for Laguna Compressor Station is accurate and complete to the best available knowledge.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.5. Submissions [40 CFR §§ 71.5(d), 71.6, and 71.9]

Any document required to be submitted by 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 records, reports, test data, monitoring data, emissions-related data, notifications, and compliance certifications, shall be submitted to:

Air Enforcement Section, 6EN-A
1445 Ross Avenue
Dallas, TX 75202-2733

While the fee calculation worksheets, (that include the annual emissions worksheet and report), and applications for renewals and permit modifications shall be submitted to:

Air Permits Section, 6PD-R
1445 Ross Avenue
Dallas, TX 75202-2733

Compliance Methods for the Above (Description and Citation): On February 21, 2008, R. Duarte checked that all documents (fees, inventory, ACC and six-month reports) submitted pursuant to Permit were signed by a responsible official of EPNG to certify to the truth, accuracy, and completeness of the information being presented. Furthermore, EPNG has submitted all documents relating to Permit to the appropriate address shown in this condition.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.6. Severability Clause [40 CFR § 71.6(a)(5)]
The provisions of this permit are severable, and 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.

Compliance Methods for the Above (Description and Citation): This condition imposes no action by EPNG during this reporting period as nothing has been severed by the permit.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.7. Permit Actions [40 CFR § 71.6(a)(6)(iii)]
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.

Compliance Methods for the Above (Description and Citation): This condition imposes no action by EPNG during this reporting period as there are no permit actions in place by the US EPA for this facility.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.8. Administrative Permit Amendments [40 CFR § 71.7(d)]

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

- 5.8.1. Corrects typographical errors;
- 5.8.2. 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;
- 5.8.3. Requires more frequent monitoring or reporting by the permittee;
- 5.8.4. Allows for a change in ownership or operational control of a source where the EPA 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 the EPA;

- 5.8.5. Incorporates into the part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of sections 71.7 and 71.8 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 71.6; and
- 5.8.6. Incorporates any other type of change which EPA has determined to be similar to those listed above in subparagraphs 5.8.1. through 5.8.5 above.

Compliance Methods for the Above (Description and Citation): EPNG did not request any administrative permit amendments during this reporting period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.9. Minor Permit Modifications [40 CFR § 71.7(e)(1)]

- 5.9.1. The permittee may request the use of minor permit modification procedures only for those modifications that:
 - 5.9.1.1. Do not violate any applicable requirement;
 - 5.9.1.2. Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
 - 5.9.1.3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
 - 5.9.1.4. 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:
 - 5.9.1.4.1. A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I; and
 - 5.9.1.4.2. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;
 - 5.9.1.5. Are not modifications under any provision of title I of the CAA; and
 - 5.9.1.6. Are not required to be processed as a significant modification.
- 5.9.2. Notwithstanding the list of changes eligible for minor permit modification procedures in paragraph 5.9.1. 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 EPA.
- 5.9.3. An application requesting the use of minor permit modification procedures shall meet the requirements of § 71.5(c) and shall include the following:

- 5.9.3.1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- 5.9.3.2. The source's suggested draft permit;
- 5.9.3.3. Certification by a responsible official, consistent with § 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
- 5.9.3.4. Completed forms for the permitting authority to use to notify affected States as required under § 71.8.
- 5.9.4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until EPA takes any of the actions authorized by § 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.
- 5.9.5. The permit's shield under § 71.6(f) may not extend to minor permit modifications.

Compliance Methods for the Above (Description and Citation): EPA did not request any minor permit modifications during this period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.10. Group Processing of Minor Permit Modifications [40 CFR § 71.7(e)(2)]

- 5.10.1. Group processing of modifications by EPA may be used only for those permit modifications:
- 5.10.1.1. That meet the criteria for minor permit modification procedures under paragraphs 5.9.1. of this permit; and
- 5.10.1.2. That collectively are below the threshold level of 10 percent of the emissions allowed by the permit for the emissions unit for which the change is requested, 20 percent of the applicable definition of major source in § 71.2, or five tons per year, whichever is least.
- 5.10.2. An application requesting the use of group processing procedures shall be submitted to EPA, shall meet the requirements of sections 71.5(c), and shall include the following:
- 5.10.2.1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
- 5.10.2.2. The source's suggested draft permit.
- 5.10.2.3. Certification by a responsible official, consistent with § 71.5(d), that the

- proposed modification meets the criteria for use of group processing procedures and a request that such procedures be used.
- 5.10.2.4. A list of the source's other pending applications awaiting group processing, and a determination of whether the requested modification, aggregated with these other applications, equals or exceeds the threshold set under subparagraph 5.10.1.2. above.
- 5.10.2.5. Completed forms for the permitting authority to use to notify affected States as required under § 71.8.
- 5.10.3. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by § 71.1(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.
- 5.10.4. The permit shield under § 71.6(f) may not extend to group processing of minor permit modifications.

Compliance Methods for the Above (Description and Citation): No such modifications were requested for Laguna Compressor Station during this reporting period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.11. Significant Permit Modifications [40 CFR § 71.7(f)]

- 5.11.1. The permittee must request the use of significant permit modification procedures for those modifications that:
- 5.11.1.1. Do not qualify as minor permit modifications or as administrative amendments.
- 5.11.1.2. Are significant changes in existing monitoring permit terms or conditions.
- 5.11.1.3. Are relaxations of reporting or recordkeeping permit terms or conditions.
- 5.1 1.2. 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.
- 5.1 1.3. Permittees must meet all requirements of part 71 including those for applications, public participation, and review by affected States as they apply to permit issuance and permit renewal. For the application to be determined complete, the permittee must supply all information that is required by § 71.5 (c) for permit issuance and renewal, but only that information that is related to the proposed change.

Compliance Methods for the Above (Description and Citation): There were no significant modifications were requested for Laguna Compressor Station during this reporting period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.12. Reopening for Cause [40 CFR § 71.7 (f)]

The EPA shall reopen and revise this permit under the following circumstances:

- 5.12.1. Additional applicable requirements under the CAA become applicable to a major part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to § 71.7(c)(3).
- 5.12.2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offsets plans shall be deemed to be incorporated into the permit.
- 5.12.3. The 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.
- 5.12.4. The EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Compliance Methods for the Above (Description and Citation): The US EPA did not re-open the permit for cause during this reporting period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.13. Property Rights [40 CFR § 71.6 (a)(6)(iv)]
This permit does not convey any property rights of any sort, or any exclusive privilege.

Compliance Methods for the Above (Description and Citation): Imposes no action by EPNG.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.14. Inspection and Entry [40 CFR § 71.6 (c)(2)]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow EPA or an authorized representative to perform the following:

- 5.14.1. 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;
- 5.14.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 5.14.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit: and
- 5.14.4. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements

Compliance Methods for the Above (Description and Citation): There were no agency inspections during this reporting period.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.15. Transfer of Ownership or Operation [40 CFR § 71.7 (d)(1)(iv)]

A change in ownership or operational control of this facility may be treated as an administrative permit amendment if EPA determines no other changes in this permit are 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 EPA.

Compliance Methods for the Above (Description and Citation): No change in the owners or operators.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.16. Off Permit Changes [40 CFR § 71.6(a)(12)]

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

- 5.16.1. Each change is not addressed or prohibited by this permit;
- 5.16.2. Each change shall comply with all applicable requirements and may not violate any existing permit term or condition;
- 5.16.3. Changes under this provision may not include changes or activities subject to any requirement under Title IV or that are modifications under any provision of Title I of the CAA;
- 5.16.4. The permittee shall provide contemporaneous written notice to EPA of each change, except for changes that qualify as insignificant activities under § 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;
- 5.16.5. The permit shield does not apply to changes made under this provision;
- 5.16.6. 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.

Compliance Methods for the Above (Description and Citation): There were no off-permit changes reported or conducted neither during the previous 5 years nor during this reporting period. R. Duarte checked the records for this requirement on February 21, 2008.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Facility Wide

Applicable Requirement (Description and Citation): 5.17. 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), 71.8(d)]

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

5.17.1.1. Five years elapses from the date of issuance; or

5.17.1.2. The source is issued a pan 70 permit by an EPA-approved permitting authority.

5.17.2. Expiration of this permit terminates the permittee's right to operate unless a timely and complete permit renewal application has been submitted at least six months, but not more than 18 months, prior to the expiration of this permit.

5.17.3. If the permittee submits a timely and complete permit application for renewal, consistent with § 71.5(a)(2), but the permitting authority has failed to issue or deny the renewal permit, then the permit shall not expire until the renewal permit has been issued or denied and any permit shield granted pursuant to section 71.6(f) may extend beyond the original permit term until renewal.

5.17.4. The permittee's failure to have a Part 71 permit, where timely and complete application for renewal was submitted, is not a violation of this part until EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by EPA.

5.17.5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation and affected State and tribal review.

5.17.6. 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 form.

Compliance Methods for the Above (Description and Citation): The permit expires on March 16, 2009. Therefore an application is due between 9/16/2007 and 9/15/2008. EPNG is currently preparing an application for this facility.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Emission Limits (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-1. Engine MACT: Emission Limits
MACT-1.1 Units AUX A-01 and AUX A-02 must comply with one of the following requirements [40 CFR 63.6600(a), Table 1a]:

MACT-1.1.1. Reduce formaldehyde emissions by 76 percent or more, or

MACT-1.1.2. Limit the concentration of formaldehyde in the stationary RICE exhaust to 350 ppb_{vd} or less at 15 percent O₂

Compliance Methods for the Above (Description and Citation): Meet emission limits using NSCR, monitoring performed as required by MACT

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Operational Requirements (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-2. Engine MACT: Operational Requirements
MACT-2.1. If NSCR is used to meet the emission limitation, then the engine must meet the following requirements [40 CFR 63.6600(a), Table 1b]:

MACT-2.1.1. Maintain the catalyst so that the pressure drop across the catalyst does not change by more than two inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst measured during the initial performance test; and

MACT-2.1.2. Maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 750 °F and less than or equal to 1250 °F.

MACT-2.2. Units AUX A-01 and AUX A-02 must be in compliance with the emission limitations at all times, except during periods of startup, shutdown, and malfunction. [40 CFR 63.6605(a)]

MACT-2.3. The permittee must operate and maintain Units AUX A-01 and AUX A-02, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during startup, shutdown, and malfunction. [40 CFR 63.6605(b)]

Compliance Methods for the Above (Description and Citation): Maintain the catalyst as required

Maintain and operate the unit, including associated air pollution control equipment and monitoring equipment as efficiently as possible in a manner consistent with good air pollution control practice for minimizing emissions at all times (including SSM). Correct any malfunctions as soon as practicable after their occurrence.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Performance Test Method Requirements (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-3. Engine MACT: Performance Test Method Requirements

MACT-3.1. When conducting performance tests to show compliance with the requirement to reduce formaldehyde emissions, the permittee must [40 CFR 63.6610(a), Table 4]:

MACT-3.1.1. Select sampling port location and the number of traverse points in a manner consistent with the requirements of Method 1 or 1A of 40 CFR Part 60 Appendix A at 40 CFR 63.7(d)(1)(i). Sampling sites must be located the inlet and outlet of the control device.

MACT-3.1.2. Measure O₂ at the inlet and outlet of the control device using Method 3 or 3A or 3B of 40 CFR Part 60, Appendix A. Measurements to determine O₂ concentration must be made at the same time as the measurements for formaldehyde concentration.

MACT-3.1.3. Measure moisture content at the inlet and outlet of the control device using Method 4 of 40 CFR Part 60, Appendix A, or Test Method 320 of 40 CFR Part 63, Appendix A, or ASTM D 6348-03 (a). Measurements to determine moisture content must be made at the same time and location as the measurements for formaldehyde concentration.

MACT-3.1.4. Measure formaldehyde at the inlet and the outlet of the control device using Method 320 or 323 of 40 CFR Part 63, Appendix A; or ASTM D6348- 03, provided in ASTM D6348-03 Annex A5 (Analyte Spiking Technique), the percent R must be greater than or equal to 70 and less than or equal to 130. Formaldehyde concentration must be at 15 percent O₂, dry basis. Results of this test consist of the average of the three 1-hour or longer runs.

MACT-3.2. When conducting performance tests to show compliance with the requirement to limit formaldehyde emissions in the exhaust, the permittee must [40 CFR 63.6610(a), Table 4]:

MACT-3.3.1. Select the f sampling port location and the number of traverse points; using Method 1 or 1A of 40 CFR Part 60, Appendix A 40 CFR 63.7(d)(1)(i). If using a control device, the sampling site must be located at the outlet of the control device.

MACT-3.2.2. Determine the O₂ concentration of the stationary RICE exhaust at the sampling port location using Method 3 or 3A or 3B of 40 CFR Part 60, Appendix A. Measurements to determine O₂ concentration must be made at the same time and location as the measurements for formaldehyde concentration.

MACT-3.2.3. Measure moisture content of the stationary RICE exhaust at the sampling port location; using Method 4 of 40 CFR Part 60, Appendix A, or Test Method 320 of 40 CFR Part 63, Appendix A, or ASTM D 6348-03. Measurements to determine moisture content must be made at the same time and location as the measurements for formaldehyde concentration.

MACT-3.2.4. Measure formaldehyde at the exhaust of the stationary RICE using Method 320 or 323 of 40 CFR Part 63, Appendix A; or ASTM D6348- 03, provided in ASTM D6348-03 Annex A5 (Analyte Spiking Technique), the percent R must be greater than or equal to 70 and less than or equal to 130. Formaldehyde concentration must be at 15 percent O₂, dry basis. Results of this test consist of the average of the three 1-hour or longer runs.

Compliance Methods for the Above (Description and Citation): Conduct the performance test or other compliance demonstrations.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Periodic Performance Testing Requirements (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-4. Engine MACT: Periodic Performance Testing Requirements

MACT-4.1. After the initial performance testing, subsequent performance tests to show compliance with the formaldehyde limit must be performed semiannually. [40 CFR 63.6615, Table 3]

MACT-4.2. After the permittee has demonstrated compliance for two consecutive tests, the permittee may reduce the frequency of subsequent performance tests to annually. If the results of any subsequent annual performance test indicate the stationary RICE is not in compliance with the CO or formaldehyde emission limitation, or the permittee deviates from any of the permittee's operating limitations, the permittee must resume semiannual performance tests. [40 CFR 63.6615, Table 3, Note 1]

Compliance Methods for the Above (Description and Citation): Conduct subsequent performance tests semiannually.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Performance Test Methods Requirements (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-5. Engine MACT: Performance Test Methods Requirements

MACT-5.1. The permittee must conduct each performance test in Tables 3 and 4 of 40 CFR 63 Subpart ZZZZ that applies to the permittee. [40 CFR 63.6620(a)]

MACT-5.2. Each performance test must be conducted according to the requirements in 40 CFR 63.7(e)(1) and under the specific conditions. The test must be conducted at any load condition within plus or minus 10 percent of 100 percent load. [40 CFR 63.6620(a) and (b)]

MACT-5.3. The permittee may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 CFR 63.7(e)(1). [40 CFR 63.6620(c)]

MACT-5.4. The permittee must conduct three separate test runs for each performance test required, as specified in 40 CFR 63.7(e)(3). Each test run must last at least 1 hour. [40 CFR 63.6620(d)]

MACT-5.5. The MACT equations must be used in demonstrating compliance with 40 CFR 63 Subpart ZZZZ [40 CFR 63.6620(e)]:

MACT-5.6. The engine percent load during a performance test must be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load in a specific application. A written report of the average percent load determination must be included in the notification of compliance status. The following information must be included in the written report [40 CFR 63.6620(i)]:

MACT-5.6.1. The engine model number,

MACT-5.6.2. The engine manufacturer,

MACT-5.6.3. The year of purchase,

MACT-5.6.4. The manufacturer's site-rated brake horsepower,

MACT-5.6.5. The ambient temperature, pressure,

MACT-5.6.6. Humidity during the performance test, and

MACT-5.6.7. All assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained.

MACT-5.6.8. If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the model number of the measurement device, and an estimate of its accurate in percentage of true value must be provided.

Compliance Methods for the Above (Description and Citation): Conduct performance test and CMS performance evaluation using approved methods and procedures.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Monitoring, Installation, Operation, And Maintenance Requirements (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-6. Engine MACT: Monitoring, Installation, Operation, And Maintenance Requirements

MACT-6.1. The permittee must install, operate, and maintain each CPMS according to the requirements in 40 CFR 63.8. [40 CFR 63.6625(b)]

MACT-6.2. For engines complying with the requirement to reduce formaldehyde emissions and using NSCR, the following requirements apply [40 CFR 63.6625(b), Table 5]:

MACT-6.2.1. The average reduction of emissions of formaldehyde determined from the initial performance test must be equal to or greater than the required formaldehyde percent reduction; and

MACT-6.2.2. The permittee must install a CPMS to continuously monitor catalyst inlet temperature according to the requirements in § 63.6625(b); and

MACT-6.2.3. The permittee must maintain records of the catalyst pressure drop and catalyst inlet temperature recorded during the initial performance test..

MACT-6.3. For engines complying with the requirement to limit the concentration of formaldehyde in the stationary RICE exhaust and using oxidation catalyst or NSCR, the following requirements apply [40 CFR 63.6625(b), Table 5]

MACT-6.3.1. The average formaldehyde concentration, corrected to 15 percent O₂, dry basis, from the three test runs must be less than or equal to the formaldehyde emission limitation; and

MACT-6.3.2. The permittee must install a CPMS to continuously monitor catalyst inlet temperature according to the requirements in 40 CFR 63.6625(b); and

MACT-6.3.3. The permittee must maintain records of the catalyst pressure drop and catalyst inlet temperature recorded during the initial performance test.

Compliance Methods for the Above (Description and Citation): Install, operate and verify a Continuous Monitoring System (CMS) to Continuous monitor catalyst inlet temperature. CMS shall be installed, operational, and the data verified prior to or in conjunction with the initial performance test. Record the catalyst pressure drop and catalyst inlet temperature during the initial performance test.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Continuous Compliance Requirements (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-8. Engine MACT: Continuous Compliance Requirements

MACT-8.1. If the permittee must comply with emission and operating limitations, the permittee must monitor and collect data according to the following requirements: [40 CFR 63.6635(a)]

MACT-8.1.1. Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span

- adjustments), the permittee must monitor continuously at all times that the stationary RICE is operating. [40 CFR 63.6635(b)]
- MACT-8.1.2. The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. [40 CFR 63.6635(c)]
- MACT-8.2. The permittee must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b and Tables 2a and 2b of 40 CFR 63 Subpart ZZZZ that apply to the permittee (conditions immediately following). [40 CFR 63.6640(a)]
- MACT-8.3. For each engine complying with the requirement to reduce formaldehyde emissions and using NSCR, the permittee must demonstrate continuous compliance by [40 CFR 63.6640(a), Table 6]:
- MACT-8.3.1. Collecting the catalyst inlet temperature data according to 40 CFR 63.6625(b);
 - MACT-8.3.2. Reducing these data to 4-hour rolling averages;
 - MACT-8.3.3. Maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and
 - MACT-8.3.4. Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.
- MACT-8.4. For each engine complying with the requirement to limit the concentration of formaldehyde in the exhaust and using oxidation catalyst or NSCR, the permittee must demonstrate continuous compliance by [40 CFR 63.6640(a), Table 6]:
- MACT-8.4.1. Conducting semiannual performance tests for formaldehyde to demonstrate that the permittee's emissions remain at or below the formaldehyde concentration limit;
 - MACT-8.4.2. Collecting the catalyst inlet temperature data according to 40 CFR 63.6625(b);
 - MACT-8.4.3. Reducing these data to 4-hour rolling averages;
 - MACT-8.4.4. Maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and
 - MACT-8.4.5. Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.
- MACT-8.5. For semiannual testing (3 conditions above), after the permittee has demonstrated compliance for two consecutive tests, the permittee may reduce the frequency of subsequent performance tests to annually. If the results of any subsequent annual performance test indicate the stationary RICE is not in compliance with the formaldehyde emission limitation, or the permittee deviates from any of the permittee's operating limitations, the permittee must resume semiannual performance tests. [40 CFR 63.6640(a), Table 6, Note 1]
- MACT-8.6. The permittee must report each instance in which the permittee did not meet each emission limitation or operating limitation in Tables 1a and 1b and Tables 2a and 2b of 40 CFR 63 Subpart ZZZZ that apply to the permittee. These instances are deviations from the emission and operating limitations in 40 CFR 63 Subpart ZZZZ. These deviations must be reported according to the requirements in §63.6650. If the permittee changes the catalyst, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the permittee reestablishes the values of the operating parameters, the permittee must also conduct a performance test to demonstrate that the permittee is meeting the required emission limitation applicable to the permittee's stationary RICE. [40 CFR 63.6640(b)]
- MACT-8.7. During periods of startup, shutdown, and malfunction, the permittee must operate in accordance with the permittee's startup, shutdown, and malfunction plan. [40 CFR 63.6640(c)]
- MACT-8.8. Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations from the emission or operating limitations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to the USEPA Administrator's satisfaction that the permittee was operating in accordance with the startup, shutdown, and malfunction plan. For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations

that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR 94.11(a). [40 CFR 63.6640(d)]

MACT-8.9. The permittee must also report each instance in which the permittee did not meet the requirements in Table 8 of 40 CFR 63 Subpart ZZZZ (attached as Attachment 1) that apply to the permittee. [40 CFR 63.6640(e)]

Compliance Methods for the Above (Description and Citation): Measure the pressure drop across the catalyst once per month and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the most recent performance test.

Continuously operate the catalyst inlet temperature monitor (except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, or calibration drift adjustments). Collect the catalyst inlet temperature data. Reduce these data to 4-hour rolling averages. Maintain the 4-hour rolling averages greater than or equal to 750 °F and less than or equal to 1250 °F.

Install, operate and verify a Continuous Monitoring System (CMS) to Continuous monitor catalyst inlet temperature. CMS shall be installed, operational, and the data verified prior to or in conjunction with the initial performance test. Record the catalyst pressure drop and catalyst inlet temperature during the initial performance test.

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Reporting Requirements (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-9. Engine MACT: Reporting Requirements

MACT-9.1. The permittee must submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to the permittee by the dates specified. [40 CFR 63.6645(a)]

MACT-9.2. The permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in 40 CFR §63.7(b)(1). [40 CFR 63.6645(e)]

MACT-9.3. For any performance test as specified in Tables 4 and 5 to 40 CFR 63 Subpart ZZZZ, the permittee must submit a Notification of Compliance Status according to 40 CFR §63.9(h)(2)(ii). [40 CFR 63.6645(f)]

MACT-9.4. The permittee must submit a compliance report semiannually according to the requirements in 40 CFR 63.6650(b) containing the following [40 CFR 63.6650(a), Table 7]:

MACT-9.4.1. If there are no deviations from any emission limitations or operating limitations that apply to the permittee, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40

- CFR § 63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; or
- MACT-9.4.2. If the permittee had deviation from any emission limitation or operating limitation during the reporting period, the information in 40 CFR § 63.6650(d). If there were periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR § 63.8(c)(7), the information in 40 CFR § 63.6650(e); or
- MACT-9.4.3. If the permittee had a startup, shutdown or malfunction during the reporting period, the information in 40 CFR § 63.10(d)(5)(i).
- MACT-9.5. The permittee must submit an immediate startup, shutdown, and malfunction report if actions addressing the startup, shutdown, or malfunction were inconsistent with the permittee's startup, shutdown, or malfunction plan during the reporting period. The reporting must be consistent with the following requirements [40 CFR 63.6650(a), Table 7]:
- MACT-9.5.1. Actions taken for the event must be submitted by fax or telephone within 2 working days after starting actions inconsistent with the plan.
- MACT-9.5.2. The information in 40 CFR 63.10(d)(5)(ii) must be submitted by letter within 7 working days after the end of the event unless the permittee has made alternative arrangements with the permitting authorities. (40 CFR 63.10(d)(5)(ii))
- MACT-9.6. Annually, according to the requirements in 40 CFR 63.6650, the permittee must report [40 CFR 63.6650(a), Table 7]:
- MACT-9.6.1. The fuel flow rate of each fuel and the heating values that were used in the permittee's calculations, and the permittee must demonstrate that the percentage of heat input provided by landfill gas or digester gas, is equivalent to 10 percent or more of the gross heat input on an annual basis; and
- MACT-9.6.2. The operating limits provided in the permittee's federally enforceable permit, and any deviations from these limits; and
- MACT-9.6.3. Any problems errors suspected with the meters
- MACT-9.7. Unless the Administrator has approved a different schedule for submission of reports under 40 CFR §63.10(a), the permittee must submit each report by the date listed in Conditions 3.9.7 through 3.9.9 and according to the following requirements [40 CFR 63.6650(b)]:
- MACT-9.7.1. The first Compliance report must cover the period beginning on the compliance date that is specified for the permittee's affected source in 40 CFR §63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the permittee's source in 40 CFR §63.6595..
- MACT-9.7.2. The first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the permittee's affected source in 40 CFR §63.6595.
- MACT-9.7.3. Each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31..
- MACT-9.7.4. Each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.
- MACT-9.7.5. For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), the permittee may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates previously specified.
- MACT-9.8. The Compliance report must contain the following information [40 CFR 63.6650(c)]:
- MACT-9.8.1. Company name and address.
- MACT-9.8.2. Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.

- MACT-9.8.3. Date of report and beginning and ending dates of the reporting period.
- MACT-9.8.4. If the permittee had a startup, shutdown, or malfunction during the reporting period, the compliance report must include the information in 40 CFR §63.10(d)(5)(i).
- MACT-9.8.5. If there are no deviations from any emission or operating limitations that apply to the permittee, a statement that there were no deviations from the emission or operating limitations during the reporting period.
- MACT-9.8.6. If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in 40 CFR §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
- MACT-9.9. For each deviation from an emission or operating limitation that occurs for a stationary RICE where the permittee is not using a CMS to comply with the emission or operating limitations in Section 3 of this permit, the Compliance report must contain the information in the appropriate conditions [40 CFR 63.6650(d)]:
- MACT-9.9.1. The total operating time of the stationary RICE at which the deviation occurred during the reporting period..
- MACT-9.9.2. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
- MACT-9.10. For each deviation from an emission or operating limitation occurring for a stationary RICE where the permittee is using a CMS to comply with the emission and operating limitations in Section 3 of this permit, the permittee must include information in the appropriate conditions [40 CFR 63.6650(e)]:
- MACT-9.10.1. The date and time that each malfunction started and stopped.
- MACT-9.10.2. The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.
- MACT-9.10.3. The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR §63.8(c)(8).
- MACT-9.10.4. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.
- MACT-9.10.5. A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.
- MACT-9.10.6. A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.
- MACT-9.10.7. A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period.
- MACT-9.10.8. An identification of each parameter and pollutant (CO or formaldehyde) that was monitored at the stationary RICE.
- MACT-9.10.9. A brief description of the stationary RICE.
- MACT-9.10.10. A brief description of the CMS.
- MACT-9.10.11. The date of the latest CMS certification or audit.
- MACT-9.10.12. A description of any changes in CMS, processes, or controls since the last reporting period..
- MACT-9.11. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in Condition III in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of 40 CFR 63 Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Section 3 of this permit, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit

requirements to the permit authority. [40 CFR 63.6650(f)]

Compliance Methods for the Above (Description and Citation):

Notify EPA in writing at least 60 calendar days before the performance test and CMS performance evaluation is initially scheduled to begin.

Submit Compliance Report.

Include any deviations from the emission limitations, operating limitations, or MACT general requirements with the Compliance Report. *Deviations that occur during SSM are not violations if you demonstrate that the unit (including associated air pollution control equipment and monitoring equipment) was being operated as efficiently as possible in a manner consistent with good air pollution control practice for minimizing emissions, and that any malfunctions were corrected as soon as practicable after their occurrence.*

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

Emission Unit ID(s): Engine MACT Requirements: Recordkeeping Requirements (this section relates to Units AUX A-01 and AUX A-02 only)

Applicable Requirement (Description and Citation): MACT-10. Engine MACT: Recordkeeping Requirements

MACT-10.1. If the permittee must comply with the emission and operating limitations, the permittee must keep the records described in the appropriate conditions of this section. [40 CFR 63.6655(a)]

MACT-10.1.1. A copy of each notification and report that the permittee submitted to comply with Section 3 of this permit, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in 40 CFR §63.10(b)(2)(xiv).

MACT-10.1.2. The records in 40 CFR §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

MACT-10.1.3. Records of performance tests and performance evaluations as required in 40 CFR §63.10(b)(2)(viii).

MACT-10.2. For each CEMS or CPMS, the permittee must keep the records of the following information; [40 CFR 63.6655(b)]

MACT-10.2.1. Records described in 40 CFR §63.10(b)(2)(vi) through (xi).

MACT-10.2.2. Previous (*i.e.*, superseded) versions of the performance evaluation plan as required in 40 CFR §63.8(d)(3).

MACT-10.2.3. Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in 40 CFR §63.8(f)(6)(i), if applicable.

MACT-10.3. The permittee must keep the records required in Table 6 of 40 CFR 63 Subpart ZZZZ to

show continuous compliance with each emission or operating limitation that applies to the permittee. [40 CFR 63.6655(d)]

MACT-10.4. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1). [40 CFR 63.6660(a)]

MACT-10.5. As specified in 40 CFR §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.6660(b)]

MACT-10.6. The permittee must keep each record readily accessible in hard copy or electronic form on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1). The permittee can keep the records off-site for the remaining 3 years. [40 CFR 63.6660(c)]

Compliance Methods for the Above (Description and Citation): Keep the following records in a form suitable and readily available for expeditious inspection and review:

- A copy of each notification and report, including Initial Notification or Notification of Compliance Status
- Copies of the SSM Plan, Periodic SSM Reports, and Immediate SSM Reports
- Records of performance tests and CMS performance evaluations
- For each CMS
 - Records identifying each period during which a CMS is malfunctioning or inoperative (including out-of-control periods)
 - All required measurements (including individual data points, hourly averages, and 4-hour average values) needed to demonstrate compliance with the standard
 - All measurements as may be necessary to determine the conditions of performance tests and CMS performance evaluations
 - All CMS calibration checks
 - All adjustments and maintenance performed on CMS
 - Previous (i.e., superseded) versions of the performance evaluation plan (CMS Quality Control Plan) Requests for alternatives to test methods, if applicable

Compliance Status:

In Compliance: Will you continue to comply up to permit issuance? Yes No

Not In Compliance: Will you be in compliance at permit issuance? Yes No

Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No

E. COMPLIANCE WITH ENHANCED MONITORING & COMPLIANCE CERTIFICATION REQUIREMENTS

This section must be completed once by every source. To certify compliance with these, you must be able to certify compliance for every applicable requirement related to monitoring and compliance certification at every unit.

Enhanced Monitoring Requirements: In Compliance Not In Compliance

Compliance Certification Requirements: In Compliance Not In Compliance



OMB No. 2060-0336, Approval Expires 09/30/2010

Federal Operating Permit Program (40 CFR Part 71)
CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Armenta (First) Sam (MI) A

Title Albuquerque Division Director

Street or P.O. Box 3801 Atrisco Boulevard, NW

City Albuquerque State NM ZIP 87120 -

Telephone (505) 831 - 7772 Ext. Facsimile (505) 831 - 7739

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) *Sam A. Armenta*

Name (typed) Sam A. Armenta Date: 9/9/08

ADJ
9/9/08
Reviewed w/ C. Notting - 9/9/08.

1 Introduction

This document and the accompanying information are an application for a renewal of the Federal Operating Permit issued in accordance with 40 CFR 71 for the Laguna Compressor Station, owned and operated by El Paso Natural Gas Company (EPNG). The document includes the standard application forms in the previous section. The narrative portion of this document is intended to clarify and expand upon the information presented in the forms.

This section gives a brief description of the facility and its history. The following sections of this narrative include a discussion of regulatory applicability (Section 2), a Compliance Plan including a discussion of Compliance Assurance Monitoring applicability (Section 3), a description of insignificant activities and emissions (Section 4), and proposed changes to the current Title V permit (Section 5), a discussion of proposed off-permit changes (Section 6) and Cross-Referenced Information (Section 7).

FACILITY DESCRIPTION

The facility is a natural gas compressor station consisting of inlet separation and natural gas compression. Emission units at the facility are as described in Form GIS.

The facility is located on the Laguna Pueblo in Cibola County, New Mexico approximately five miles southeast of the town of Laguna, New Mexico.

FACILITY HISTORY

The facility was initially constructed in 1958. The facility has not been modified since 1970, the enactment of the Clean Air Act.

2 Regulatory Applicability

INTRODUCTION

The Federal Operating Permit Regulation, 40 CFR 71.5(c)(4) requires sources to cite and describe all applicable requirements under the Clean Air Act (CAA), describe the compliance status of the facility with respect to each applicable requirement, and certify compliance. Applicable requirements include—

- Any standard or requirement in the applicable implementation plan,
- Any term or condition of any Federally enforceable pre-construction permit(s),
- Any standard under Section 111 of the CAA (New Source Performance Standards or NSPS),
- Any standard under Section 112 of the CAA (National Emissions Standards for Hazardous Air Pollutants or NESHAP),
- Any standard under the acid rain program under Title IV of the CAA,
- Any requirements under Section 114(a)(3) or Section 504(b) of the CAA (compliance certifications),
- Standards for protection of stratospheric ozone under Title VI of the CAA, or
- For temporary sources, National Ambient Air Quality Standards (NAAQS), increments, and visibility requirements.

REQUIREMENTS UNDER THE IMPLEMENTATION PLAN

Laguna Compressor Station is located on the Laguna Pueblo in Cibola County, New Mexico. There is currently no applicable Tribal Implementation Plan (TIP) or Federal Implementation Plan (FIP).

PRECONSTRUCTION PERMIT CONDITIONS

No pre-construction permits have been issued to the facility. Therefore, no permit conditions contain applicable requirements.

NEW SOURCE PERFORMANCE STANDARDS (NSPS, 40 CFR 60)

Equipment and/or processes with potential New Source Performance Standards that are generally associated with natural gas production and/or transmission facilities are:

- Boilers (Subpart D, Da, Db, and Dc)
- Petroleum Liquids (Subpart K, Ka, and Kb)
- Gas Turbines (Subpart GG)
- Equipment Leaks (Subpart KKK)
- Sweetening Units (Subpart LLL)

The facility does not have any equipment or processes that meet the criteria of the above referenced standards.

NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP, 40 CFR 61 AND 63)

The NESHAP for asbestos under 40 CFR 61 Subpart M is applicable to this facility only during asbestos demolition or renovation. There is currently an inactive asbestos landfill at the facility. No requirements currently apply.

Source category NESHAP standards for maximum achievable control technology (MACT) have been promulgated under 40 CFR 63 for certain equipment and/or processes that are generally associated with natural gas production and/or transmission facilities. These promulgated MACT standards are as follows:

- **Oil and Natural Gas Production (40 CFR 63, Subpart HH)**

The Laguna Compressor Station does not meet the criteria for an oil and natural gas production facility, as listed in this rule, so this MACT standard does not apply.

- **Natural Gas Transmission and Storage (40 CFR 63, Subpart HHH)**

The Laguna Compressor Station is considered a natural gas transmission and storage facility, as defined by this regulation and this facility is a major source of HAPs, according to emission estimates based on emission factors from the Gas Research Institute's GRI-HAPCalc Version 3.0. This regulation, however, only applies to glycol dehydration units. Since this facility does not have a glycol dehydration unit, Subpart HHH does not apply.

- **Reciprocating Internal Combustion Engine MACT (Subpart ZZZZ)**

This MACT standard only applies to certain types of engines located at major or area sources of HAPs. This facility is a major source of HAPs, as discussed above. There are five engines located at this facility, all of which are greater than 500 brake horsepower, the size cutoff for the MACT standard. Two of these engines (Units AUX A-01 and AUX A-02) are existing 4-stroke rich-burn (4SRB) engines that are subject to MACT requirements. The other three engines are all existing 2-stroke lean-burn (2SLB) engines that are exempt from MACT requirements, as described in 40 CFR 63.6600(c). The requirements for this MACT have been added to the proposed changes to the Title V permit included in Attachment 7.2.

ACID RAIN REQUIREMENTS

The facility is not an affected source under the Acid Rain Program as defined in 40 CFR 72.2. Requirements under Title IV of the CAA do not apply.

COMPLIANCE CERTIFICATIONS

Part 71 requires a statement of the compliance status of the facility with regard to applicable requirements and a description of the methods used to determine compliance. The compliance status of the facility is described in detail in Section 3, and the certification of compliance is in form I-COMP.

STRATOSPHERIC OZONE PROTECTION

The requirements under 40 CFR 82 are not applicable. EPNG does not produce, transform, destroy, or import controlled substances as defined by Subpart A of this regulation. No servicing of motor vehicle air conditioners occurs at this facility as described in Subpart B, nor does servicing, repair, or disposal of appliances by EPNG as regulated under Subpart F. All servicing is performed by certified contractors.

EPNG does not sell or distribute products listed in Subpart C of 40 CFR 82, and does not store ozone-depleting substances requiring labeling under Subpart E. Subpart G requirements (Significant New Alternatives Policy Program) do not apply.

NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS)

40 CFR Part 50 contains national primary and secondary ambient air quality standards, increments, and visibility requirements. According to 40 CFR 71.2, these requirements are only applicable to temporary sources permitted pursuant to section 504(e) of the act. This facility is not a temporary source. Therefore, NAAQS are not applicable requirements for this facility.

3 Compliance Plan

COMPLIANCE SCHEDULE

The Laguna Compressor Station is currently operated in compliance with all applicable requirements, so no compliance schedule is required at this time.

COMPLIANCE ASSURANCE MONITORING

Compliance Assurance Monitoring (CAM) is intended to provide a reasonable assurance of compliance with applicable requirements for large emission units that rely on pollution control device equipment to achieve compliance. The CAM regulations can be found in 40 CFR Part 64. CAM applicability is determined on a pollutant-specific basis. According to these regulations, an emission unit that meets all of the following criteria is subject to CAM:

1. Located at major source required to obtain Part 70 or 71 permit;
2. Subject to an emission limitation for the applicable pollutant;
3. Uses a control device (as defined by 40 CFR 64.1) to achieve compliance;
4. Potential precontrolled emissions of an applicable pollutant from the unit are equal to or greater than the major source threshold for that pollutant; and
5. Unit is not otherwise exempted by the CAM regulations.

None of the emission units located at the Laguna Compressor Station use a control device (as this term is defined by 40 CFR 64.1). Therefore, none of the units at this facility are subject to the CAM regulations.

4 Insignificant Activities and Emissions

EPNG performs certain activities which are considered insignificant based on a de minimis emission level. The de minimis emission levels are as follows:

- 2 tons per year (tpy) for regulated pollutants other than HAPs per 40 CFR 71.5(c)(11)(ii)(A); and,
- 0.5 tpy or the de minimis level established under Section 112(g) of the CAA for HAPs per 40 CFR 71.5(c)(11)(ii)(B).

Other emission units are considered insignificant based on their size. These emission units are listed in Table 4-1. Those activities listed under the category "Compressor Station Operations & Activities" are activities which occur at the facility on a somewhat regular basis, and the emissions have been estimated based on operational data and are insignificant. The remaining categories representative of the federally-approved insignificant activities lists for the state operating permit programs of Arizona, New Mexico, and Texas.

EPNG performs, or may perform in the future, certain activities which are exempted from the operating permit regulations under 40 CFR 71.5(c)(11)(i). These units need not be included in the application, but are listed here for informational purposes:

- Mobile sources
- Air conditioning units (not subject to Title VI of the CAA) or ventilating units used for human comfort that do not exhaust air pollutants from any manufacturing or other industrial process
- Heating units used for human comfort
- Non-commercial food preparation
- Consumer use of office equipment and products
- Janitorial services and consumer use of janitorial products
- Internal combustion engines used for landscaping purposes

EPNG performs or may perform other activities (not listed above) for which the emissions are non-quantifiable and, thus, insignificant. In support of this assertion, these activities are included in federally-approved insignificant activities lists from the state operating permit programs of Arizona, New Mexico, and Texas. These activities are listed in Table 4-2. Based on the best available information, EPNG believes that some or all of the insignificant activities listed in this table may be performed at this facility as part of normal operations.

EPA has also established a list of activities that may be considered "trivial activities" (refer to "White Paper for Streamlined Development of Part 70 Permit Applications", 07/10/95). Although these activities need not be included in an operating permit application, EPNG has compiled a list of trivial activities for informational purposes. This list is combined with the insignificant activities (non-quantifiable) listed in Table 4-2. This list includes trivial activities approved by the EPA for use in the Arizona, New Mexico, and Texas state operating permit programs. Note that,

any activity for which applicable requirements apply, other than ambient air standards, is not trivial, regardless of whether the activity meets the criteria listed in Table 4-2. Based on the best available information, EPNG believes that some or all of the trivial activities associated with natural gas transmission operations may be performed at this facility as part of normal operations.

Note that the tables below may not encompass all activities at the facility which may be considered insignificant and/or trivial.

Table 4-1 List of Insignificant Activities (Quantifiable)

NOTE(S):

* Currently none but, from time to time, EPNG may utilize such equipment.

No.	Category	Description	Basis for Treatment as Insignificant Activity	Est. Total # OR # per year	RAP (non-HAP)	HAP
1	Compressor Station Operations & Activities	Fugitive VOC emissions from connections, flanges, open-ended lines, valves, and other components	Estimated emissions <2 tpy regulated pollutants, <0.5 tpy HAPs For compressor facilities with 40 or less reciprocating engines and/or turbines, estimated emissions using GRI-HAPCalc v3.0 are less than the de minimis limit. Component estimate is based on GRI-HAPCalc's default estimate for a compressor station (6 turbines and 6 engines), normalized to a per-unit basis. REFER to attached GRI-HAPCalc estimate.	<40 units	x	x
2	Compressor Station Operations & Activities	Emergency Shut Down system and pressure relief valves	Estimated emissions <2 tpy regulated pollutants, <0.5 tpy HAPs	20/yr	x	x
3	Compressor Station Operations & Activities	Blowdown activities (during startup & shutdown)	Estimated emissions <2 tpy regulated pollutants, <0.5 tpy HAPs	50/yr	x	x
4	Compressor Station Operations & Activities	Cooling towers that are 3000 ton (9000 gpm) and smaller	ADEQ "List of Insignificant Activities	0*	x	

No.	Category	Description	Basis for Treatment as Insignificant Activity	Est. Total # OR # per year	RAP (non-HAP)	HAP
			- Quantifiable"			
5	General Combustion Activities & Equipment	All natural gas and/or liquefied petroleum gas-fired pieces of equipment, over 300,000 BTU/hour, if their input capacities added together are less than: a) 2 MMBTU/hour, if only emissions came from fuel burning; b) 5 MMBTU/hour, if only emissions came from fuel burning and the equipment is used solely for heating buildings for personal comfort or for producing hot water for personal use	ADEQ "List of Insignificant Activities - Quantifiable" and NMED "List of Insignificant Activities"	0*	x	x
6	General Combustion Activities & Equipment	All oil-fueled heating piece of equipment (except off-spec oil) with a maximum rated input capacity or an aggregated input capacity of less than: a) 0.5 MMBTU/hour, if only emissions came from fuel burning, or b) 1.0 MMBTU/hour, if only emissions came from fuel burning and the equipment is used solely for heating buildings for personal comfort or for producing hot water for personal use.	ADEQ "List of Insignificant Activities - Quantifiable" and NMED "List of Insignificant Activities"	0*	x	x
7	General Combustion Activities & Equipment	IC engine-driven compressors, IC engine-driven electrical generator sets, and IC engine water pumps less than 500-HP used only for emergency replacement or standby service (including testing of same), not to exceed 500 hours of operation per year.	ADEQ "List of Insignificant Activities - Quantifiable" and NMED "List of Insignificant Activities"	0*	x	x
8	General Combustion Activities & Equipment	Gas turbines with a maximum heat input at International Standards Organization (ISO) Standard Day Conditions of less than 3 MMBTU/hour fired exclusively with natural gas	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x

No.	Category	Description	Basis for Treatment as Insignificant Activity	Est. Total # OR # per year	RAP (non-HAP)	HAP
		and/or liquefied petroleum gas.				
9	General Combustion Activities & Equipment	Other portable IC engines that have an individual design capacity less than or equal to: a) 200-HP if fueled by diesel, or b) 500-HP if fueled by gasoline.	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x
10	Surface Coating	The aggregate of all surface coating operations of a source in which no coated product is heat cured and a combined total of one gallon per day or less of all coating materials and solvents are used in processes at the source.	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x
11	Surface Coating	Use of hand-held aerosol cans in coating operations.	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x
12	Solvent Cleaning Equipment	Unheated non-conveyorized, cleaning or coating equipment that does not include enclosures: a) with an open surface area of one square meter (10.8 square feet) less and an internal volume of 350L (92.5 gallons) or less, having an organic solvent loss of three gallons per day or less, or unless subject to a NESHAPs (one gallon of it contains HAPs) (if it's a VOC organic solvent); b) Using only organic solvents with an initial boiling point of 302F or greater and having an organic solvent loss of 3 gallons per day or less; or c) Using materials with a VOC content of 2% (20 grams per liter) or less by volume.	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x
13	Storage & Distribution	Chemical or petroleum storage tanks or containers that hold 250 gallons or less and would	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x

No.	Category	Description	Basis for Treatment as Insignificant Activity	Est. Total # OR # per year	RAP (non-HAP)	HAP
		have emissions of a regulated air pollutant.				
14	Storage & Distribution	Any emissions unit, operation, or activity that handles or stores a VOC or HAP organic liquid with a vapor pressure less than 1.5 psia.	ADEQ "List of Insignificant Activities - Quantifiable"	3 (ethylene glycol)	x	x
15	Storage & Distribution	Any stationary gasoline dispensing operation receiving less than 60,000 gallons of gasoline annually which is not for resale, provided that each gasoline dispensing tank is equipped with a permanent submerged fill pipe.	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x
16	Storage & Distribution	Diesel and fuel oil storage tanks with capacity of 40,000 gallons or less. ¹	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x
17	Storage & Distribution	Gasoline storage tanks with capacity of 10,000 gallons or less	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x
18	Storage & Distribution	Petroleum-based solvent tanks less than 10,000 gallons (solvent with a vapor pressure less than gasoline)	Vapor pressure less than gasoline, see above item	1	x	x
19	Storage & Distribution	Tanks less than 105,000 gallons storing condensate prior to custody transfer	TNRCC "Off-Permit Application Sources and Activities"	0*	x	x
20	Miscellaneous Activities	Self-contained, enclosed blast and shot peen equipment where the total internal volume of the blast section is 50 cubic feet or less and where the control equipment vents exclusively such equipment.	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	
21	Miscellaneous Activities	Acetylene, butane, and propane torches.	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	x
22	Miscellaneous Activities	Batch mixers with rated capacity of 5 cubic feet or less.	ADEQ "List of Insignificant Activities - Quantifiable"	0*	x	
23	Miscellaneous Activities	Any other activity, not otherwise subject to an applicable requirement, which the Agency determines is not necessary, because of its emissions due to a size or production rate, to be included			x	x

No.	Category	Description	Basis for Treatment as Insignificant Activity	Est. Total # OR # per year	RAP (non- HAP)	HAP
		in an application in order to determine all applicable requirements or to calculate any fee pursuant to 40 CFR Part 71.				

¹ Storage tanks of 10,000 gallons or less containing diesel fuel, lubricating oil, transformer oil, used oil, or other non-HAP organic liquids with a vapor pressure less than or equal to 1.5 psia are considered "Trivial" (refer to Table 5-2).

Table 4-2 List of Insignificant Activities (Non-Quantifiable) and Trivial Activities

No.	Category	Description
1	Compressor Station Operations & Activities	Cathodic protection systems.
2	Compressor Station Operations & Activities	Condensate truck loading.
3	Compressor Station Operations & Activities	Cooling water systems
4	Compressor Station Operations & Activities	Domestic wastewater systems
5	Compressor Station Operations & Activities	Evaporation ponds (including temporary hydrostatic test water evaporation ponds)
6	Compressor Station Operations & Activities	Exercise of standby equipment
7	Compressor Station Operations & Activities	Fan systems
8	Compressor Station Operations & Activities	Maintenance and use of inertial separators (to filter air intake into gas turbine engines)
9	Compressor Station Operations & Activities	Natural gas odorizing activities.
10	Compressor Station Operations & Activities	Natural gas pressure regulators, excluding venting at oil and gas production facilities.
11	Compressor Station Operations & Activities	Oil/water system
12	Compressor Station Operations & Activities	Pipeline maintenance pigging activities.
13	Compressor Station Operations & Activities	Plant water and wastewater system
14	Compressor Station Operations & Activities	Scrubber liquid systems
15	Compressor Station Operations & Activities	Uninterruptable power supply systems
16	Compressor Station Operations & Activities	Use of chlorination systems
17	Compressor Station Operations & Activities	Used oil systems
18	Compressor Station Operations & Activities	Utility pumps & systems
19	Compressor Station Operations & Activities	Well cellars.
20	Electric Operations & Activities	Electric motors, circuit breakers, station transformers, transformer vents
21	Emergency Activities & Equipment	Fire fighting activities and training conducted in preparation for fighting fires.
22	Emergency Activities & Equipment	Fire suppression systems.
23	Emergency Activities & Equipment	Flares used to indicate danger to the public (including emergency road flares).
24	Emergency Activities & Equipment	Safety devices, including fire extinguishers.
25	Emergency Activities &	Stormwater and fire sprinkler water holding systems.

No.	Category	Description
	Equipment	
26	General Combustion Activities & Equipment	Any natural gas and/or liquefied petroleum gas-fired piece of equipment that individually has an input capacity of less than 300,000 BTU/hour, if only emissions result from fuel burning.
27	General Combustion Activities & Equipment	Open burning activities (with a valid open burning permit).
28	Hand Operated Equipment	Air compressors and pneumatically operated equipment including hand tools.
29	Hand Operated Equipment	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
30	Hand Operated Equipment	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, tuning, or machining wood, metal, or plastic.
31	Hand Operated Equipment	Portable electrical generators that can be moved by hand from one location to another ("moved by hand" means that it can be moved without the assistance of any motorized or non-motorized conveyance or device).
32	Miscellaneous Activities	Batteries and battery changing stations.
33	Miscellaneous Activities	Cleaning equipment using water, water and soap (detergent) for the purposes of cleaning or finishing
34	Miscellaneous Activities	Garbage handling, including dumpsters, pails, drums, processing of recyclable materials, bailing, and compacting.
35	Miscellaneous Activities	General construction and transport of materials to and from the station
36	Miscellaneous Activities	Materials, chemicals, and equipment used by an infirmary to care primarily for any personnel at the site.
37	Miscellaneous Activities	Non-anthropogenic wind-blown dust.
38	Miscellaneous Activities	Non-hand held, stationary equipment used for buffing, carving, cutting, drilling, surface grinding, machining, planing, routing, sanding, sawing, shredding, or turning of precision parts, metals, plastics, rubber, fiberboard, masonry, carbon, graphite, or glass.
39	Miscellaneous Activities	Outdoor barbecue pits, campfires, and fireplaces.
40	Miscellaneous Activities	Ozone generators.
41	Miscellaneous Activities	Power generation unit gas vents (sources must provide a description of these vents with their application). (A generation unit gas vent is a gas solenoid valve that vents trapped gas from a generation unit).
42	Miscellaneous Activities	Processing of nearly empty containers (usable product already removed) by rinsing, crushing, shredding, compacting, etc.
43	Miscellaneous Activities	Servicing and use of air conditioning and cooling equipment that are subject to applicable requirements under Title VI of the Act.
44	Miscellaneous Activities	Steam leaks.
45	Miscellaneous Activities	Steam vents and safety relief valves.
46	Miscellaneous Activities	Vacuum pumps.
47	Miscellaneous Activities	Venting of compressed natural gas, butane, or propane gas cylinders with a capacity of 1 gallon or less.
48	Office Activities & Equipment	Tobacco smoking rooms & areas
49	Office Activities & Equipment	Use of consumer products, including hazardous substances as the term is defined in the Federal Hazardous Substances Act (15 USC 261 et. seq.), where the product is used at a source in the same manner as normal consumer use.
50	Repair & Maintenance	Activities at a source associated with the maintenance, repair, or dismantlement of an emissions unit or other equipment installed at the source, including preparation for maintenance, repair, or dismantlement and preparation for subsequent startup, including preparation of a shut down vessel for entry,