Administrative Record In Support Of CAA Title V Operating Permit
Transwestern Pipeline Company
Compressor Station No.6 - Laguna
Laguna Pueblo, Cibola County, New Mexico
Permit Number R6NM-2-08R2

Document Number	Date	Description
1	10/17/2008	Title V Permit Number R6NM-01-08R1, as issued, 23 pages.
2	10/31/2012	Application for Renewal of Title V Permit Renewal, 72 pages.
3	8/20/2014	Email, Transwestern revised PTE Calculations Summary, 10 pages.
4	10/2/2014	Email, Tranwestern revised HAP's PTE Calculations Summary, 2 pages.
5	9/28/2015	Email, Transwestern Unit No. 621, Emergency Generator, 1 page.
6	12/1/2015	Email, Transwestern Comments on draft permit, 1 page.
7	12/21/2015	Draft Source Determination 5 pages
8	12/16/2015	Draft Statement of Basis, 17 pages
9	12/17/2015	Draft Title V Permit, 27 pages
10	12/21/2015	Public Notice of Draft Permit, 3 pages

Document #1

FEDERAL CLEAN AIR ACT TITLE V OPERATING PERMIT

FOR

TRANSWESTERN PIPELINE COMPANY

COMPRESSOR STATION NUMBER 6 (LAGUNA)
LAGUNA, CIBOLA COUNTY, NEW MEXICO

Based On
40 Code of Federal Regulations (CFR) Part 71
Federal Operating Permit Program
Promulgated July 1, 1996, as amended

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

FEDERAL CLEAN AIR ACT TITLE V OPERATING PERMIT

Issue Date:	October 17, 2008	Permit Number:	R6NM-01-08R1
Effective Date:	October 17, 2008	Replaces Permit Number:	R6FOPP71-01
Expiration Date:	October 17, 2013		

In accordance with the provisions of Title V of the Clean Air Act and 40 CFR Part 71 and applicable rules and regulations,

Transwestern Pipeline Company
Compressor Station Number 6 (Laguna)
Laguna, Cibola County, New Mexico

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

This source is authorized to operate in the following location(s):

Laguna Reservation in New Mexico
Latitude: 35° 01' 56" Longitude: 107° 40' 40"

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by the Environmental Protection Agency (EPA) and citizens under the Clean Air Act.

If all proposed control measures and/or equipment are not installed and properly operated and maintained, this will be considered a violation of the permit.

The permit number cited above should be referenced in future correspondence regarding this facility.

OCT 17 2008

Carl E. Edlund, P.E.
Director
Multimedia Planning and Permitting Division
U.S. Environmental Protection Agency

Date

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Abbreviations and Acronyms

CAA	Clean Air Act [42 U.S.C. § 7401 et seq.]
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
ID. No.	Identification Number
MMBtu	million British Thermal Units
NOx	Nitrogen Oxides
PM10	Particulate matter less than 10 microns in diameter
SO_2	Sulfur Dioxide
EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
MBTA	Migratory Bird Treaty Act
tpy	Tons per year

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Introduction

This permit is valid only for the named permittee, owner, and operator. A permit modification is required to change any of those entities. Transwestern Pipeline Company will operate a natural gas compression and transmission facility named Compressor Station Number 6 (Laguna), consisting of three engine driven gas compressors, one gas-fired generator, one mist extractor vessel, and several storage tanks, with a number of blowdown relief valves. The facility is located on Laguna Pueblo Indian Reservation, New Mexico, approximately ½ mile south of the Village of Laguna, New Mexico.

The term of this permit is five (5) years. It will expire five years from the date of issuance, pursuant to 40 CFR § 71.6(a)(2). Application for renewal of this permit is due a minimum of 6 months, and not more than 18 months prior to the date of expiration, pursuant to 40 CFR § 71.5(a)(1)(iii).

Pursuant to 40 CFR § 71.6, the Environmental Enforcement Agency specifies with this permit, terms and conditions upon the operation of this facility to assure compliance with all applicable requirements as defined in 40 CFR § 71, at the time this permit is issued.

Pursuant to 40 CFR § 71.6(b), all terms and conditions are enforceable by the Administrator of the United States Environmental Protection Agency and citizens under the federal Clean Air Act (Act), unless the term or condition is specifically designated in this permit as not being enforceable under the Act.

1. Source Identification and Unit Specific Information

1.1. General Source Information

Owner and Operator:	Transwestern Pipeline Company P.O. Box 1188
Plant Name:	Compressor Station Number 6 (Laguna)
Plant location:	½ mile south of Laguna, New Mexico
EPA Region:	6
State:	New Mexico
Tribe:	Laguna
County:	Cibola
Reservation:	Laguna Indian Reservation
Plant mailing address:	P.O. Box 61 Laguna, NM 87026
Responsible Official:	Mr. Don Hawkins Sr. Vice President, Operations & Engineering Transwestern Pipeline Company 711 Louisiana St., Suite 900 Houston, TX 77002 Phone: 281-714-2300 (office)
Plant Contact:	Mr. Alan O'Connor

AMT Technician
Transwestern Pipeline Company
P. O. Box 61
Laguna NM 87026
Phone: (505) 347-6606

Standard Industrial
Code (SIC) Code: 4922
AIRS Facility System
Plant Identification Number: R6FOPP71-01

1.2. Source Emission Points

Table 1.A. Regulated Emission Points

Emission Unit ID No.	Unit Description	Size	Control Equipment
601	Clark TVC-12 Reciprocating Compressor Engine, Serial number 107510	4500-Horse Power (hp)	N/A
602	Clark TVC-12 Reciprocating Compressor Engine, Serial number 107511	4500-hp	N/A
603	Clark TVC-12 Reciprocating Compressor Engine, Serial number 107512	4500-hp	N/A
621	Waukesha F3520GU Reciprocating Generator Engine, Serial number 129011	470-hp	N/A
T-2	Pipeline Liquids (Condensate) Fixed Roof Storage Tank	500 barrel	N/A
MIST*	1,100-gallon Mist Extractor Vessel	4200 gal/yr	Fixed roof

*The Mist Extractor Vessel was formerly excluded in the initial Title V permit for this facility as an existing insignificant source. Material received as clarification to the application, has been used to identify and quantify these emissions, using the EPA Tanks program with the Vasquez Beggs equation. The Extractor is now one of the identified emission units covered under this permit. Other, formerly unclassified emission sources, are listed in Table 1B as insignificant, unregulated sources, per listed exemptions in the federal regulations.

Table 1.B. Insignificant Emission Points (Unregulated)

Emission Unit ID No.	Unit Description	Size	Exemptions to Federal Requirements
1	Oily Waste Water Tank	210-bbl	< 2 tpy, 40 CFR § 71.5(c)(11)(ii)
2	Engine Lube Oil Tank	210-bbl	< 2 tpy, 40 CFR § 71.5(c)(11)(ii)
2	Ethylene Glycol Tank	65-bbl	< 2 tpy, 40 CFR § 71.5(c)(11)(ii)
1	Used Ethylene Glycol Tank	65-bbl	< 2 tpy, 40 CFR § 71.5(c)(11)(ii)
2	Used Lube Oil Tank	65-bbl	< 2 tpy, 40 CFR § 71.5(c)(11)(ii)
1	Pipeline Liquids Truck Loading Point		< 2 tpy, 40 CFR § 71.5(c)(11)(ii)
1	Fugitive Emissions		< 2 tpy, 40 CFR § 71.5(c)(11)(ii)

1.3. Potential to Emit

Table 2.A. Potential to Emit in Tons per Year (tpy)

Transwestern Pipeline Company, Compressor Station Number 6, Laguna

Emissions Unit and Unit ID	NOx	VOC	SO2	PM10	CO	Lead	HAP
Clark TVC-12 Reciprocating Compressor Engine, 601	498.6	18.2	0.1	7.3	151.2	0	11.4
Clark TVC-12 Reciprocating Compressor Engine, 602	498.6	18.2	0.1	7.3	151.2	0	11.4
Clark TVC-12 Reciprocating Compressor Engine, 603	498.6	18.2	0.1	7.3	151.2	0	11.4
Waukesha F3520GU Reciprocating Generator Engine, 621	2.32	0.1	0	0.1	3.9	0	0.1
Pipeline Liquids (Condensate) Fixed Roof Storage Tank, T-2	0	12.5	0	0	0	0	0
1100-Gallon Mist Extractor Vessel	0	2.5	0	0	0	0	0
TOTALS	1,498.1	69.7	0.3	22.0	457.5	0	34.3

NOx - oxides of nitrogen
VOC - volatile organic compounds

SO2 - sulfur dioxide
PM10 - particulate matter with a diameter 10 microns or less
CO - carbon monoxide
HAP - hazardous air pollutants (*see* CAA Section 112(b))

Table 2.B. Change in Emission Pollutant Versus Total Emissions, tons/year for Regulated Units

Transwestern Pipeline Company, Compressor Station Number 6, Laguna

Pollutant	**Total Emissions, tons/year[3]** **Current Permit**	**Total Emissions, tons/year[2, 3]** **Proposed Permit**	**Total Emissions, tons/year** **Proposed Change**
NOx[1]	1,540	1,498	- 42
SO_2	0.0	0.3	+ 0.3
CO[2]	490	457.5	- 32.5
PM_{10}	22	22	0.0
VOC	61	69.7	+ 8.7
Lead	0.0	0.0	0.0
HAPs[4]	24	34.3	+ 10.3

[1]Total Potential pollutant emissions for NOx and CO include emission tests for the compressor engines from similar units in Arizona, plus a 20% safety factor.
[2]Communique with Transwestern Pipeline Co., dated March 13, 2008, indicates SSM emissions are included in the 20% safety factor from the test data on the similar compressor engines in Arizona
[3]Total Potential criteria pollutant emissions are listed for entire facility.
[4]The potential to emit for VOC includes 25 tons/year of formaldehyde as a HAP, a re-speciation of the HAPs, based on recalculations from actual emissions and updated AP-42 emission factors.

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 Clean Air Act (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 U.S. EPA to obtain information from a source under Section

114 of the Clean Air Act or;

2.2. Compliance with the terms and conditions of this permit shall be deemed in compliance with the applicable requirements specifically listed in of this permit as of the date of permit issuance.

This permit shield does not extend to administrative amendments, to minor permit modifications, to changes made under Section 502(b)(10) of the federal Clean Air Act, or to permit terms for which notice has been given to reopen or revoke all or part.

3. Facility Wide Permit Conditions - Generic Permit Requirements

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

3.1. There is no air pollution control equipment installed at this facility.

3.2. The amount of natural gas burned in emission units 601, 602, 603, and 621 shall not exceed the following:

601 - 289 million cubic feet (mmcf)/yr;
602 - 289 million cubic feet (mmcf)/yr;
603 - 289 million cubic feet (mmcf)/yr; and
621 - 35.1 million cubic feet (mmcf)/yr.

3.3. The actual heat input for emission units 601, 602, and 603 shall not exceed 34.65 MMBtu/hr, and the actual heat input for emissions unit 621 shall not exceed 4.2 MMBtu/hr.

3.4. The permittee shall keep records on all repair and maintenance activities performed on all emission units. These records shall identify the relevant emission unit and describe the work performed.

3.5. The fuel flow/consumption for each emission unit (601, 602, 603, and 621) shall be recorded on a monthly basis.

3.6. The records of fuel consumption shall be maintained for emission units 601, 602, 603, and 621.

3.7. The actual heat input rate for emission units 601, 602, 603, and 621 shall be recorded on a monthly basis.

3.8. The records of heat input shall be maintained for emission units 601, 602, 603, and 621.

3.9. The permittee shall keep records of the serial numbers for each emission unit. The

emission units and their serial numbers are: 601 with serial number 107510; 602 with serial number 107511; 603 with serial number 107512; 621 with serial number 129011. The emission unit ID T-2 does not have a serial number. A change in serial number should also be reflected in the report.

3.10. Retention of these records and support information shall be for a period of at least five years from the date of measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

3.11. The following records shall be submitted to EPA every six months following the anniversary of permit issuance:

3.11.1. Fuel consumption records for units 601, 602, 603, and 621 showing the recorded monthly and 12-month rolling average on annual basis of fuel usage;

3.11.2. Fuel heat input ratings records for units 601, 602, 603, and 621 showing the recorded monthly and 12-month rolling average on annual basis in MMBtu/hr.,

3.11.3. Repair and maintenance records of the emission units identified in the permit; and

3.11.4 Anticipated construction activities that may have consequences related to item 4. below

3.11.5 Copies of these records shall also be sent to:

Environmental Director
Pueblo of Laguna
P.O. Box 194
Laguna, NM 87026

every six months following the anniversary of permit issuance.

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), EPA Region 6 will ensure that any construction activities undertaken by the facility occur outside the general migratory bird nesting season of March through August, or that areas proposed for construction during the nesting season be surveyed, and if necessary be avoided until nesting is complete. 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.

Because the facility was not required to obtain a construction permit for its current activities, should the facility undertake construction activities in the future, EPA will reinitiate consultation

with the Fish and Wildlife Service (FWS), pursuant to the memorandum of understanding between EPA and FWS, in order to address ESA issues before issuance of a permit or emissions authorization. A list of the Cibola County threatened, endangered, and candidate species, and Species of Concern, is included at Appendix A.

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. [40 CFR § 71.9(a).]

5.1.2. The permittee shall pay the annual permit fee each year:

The fee shall be received no later than July 20 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:

For regular US postal service mail	For non-US Postal Service express mail (FedEx, Airborne, DHL, and UPS)
US Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center PO Box 979078 St. Louis, MO 63197-9000	U.S. Bank Government Lockbox 979078 US EPA FOIA & Misc. Payments 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101
Contact: Craig Steffen 513-487-2091, or Eric Volck 513-487-2105	Contact: 314-418-1028

For electronic payment (identify permit number for payment in form)

Automated Clearinghouse (ACH) for receiving US currency
PNC Bank
ABA: 051036706
Account Number: 310006
CTX Format Transaction Code 22 – checking

Environmental Protection Agency
808 17th Street, NW
Washington, DC 20074

Contact: Jesse White 301-887-6548

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. [Note that an annual emissions report, required at the same time as the fee calculation worksheet by § 71.9(h), has been incorporated into the fee calculation worksheet form as a convenience. Also note, a new 2008 Fee Calculation Worksheet has been approved by EPA, as OMB No. 2060-0336. Approval for this Worksheet expires 09/30/2010.]

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. [See 40 CFR § 71.9(c)(6).]

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. [See 40 CFR § 71.9(e)(2).]

5.1.6.1.3. The term "regulated pollutant (for fee calculation)" is defined in 40 CFR § 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. [See 40 CFR § 71.9(c)(5)(i)].

5.1.6.2.2. Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation. [See § 71.9(c)(5)(ii)].

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). [See 40 CFR § 71.9(c)(5)(iii)].

5.1.7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official in accordance with 40 CFR § 71.5(d).

5.1.8. The permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for five years following submittal of fee payment. Emission-related data include, 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 40 CFR § 71.6(a)(3)(ii). [See 40 CFR § 71.9(i)].

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 40 CFR § 71.9(l).

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. [See 40 CFR § 71.9(m)].

5.1.11 When notified by EPA of underpayment of fees, the permittee shall remit full payment within 30 days of receipt of notification. [See 40 CFR § 71.9(j)(1) and (2)].

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 a written explanation of the alleged error to EPA along with full payment of the assessed fee. [See 40 CFR § 71.9(j)(3)].

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 Title V 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 40 CFR § 71, 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. [See 40 CFR §§ 71.6(a)(6)(i) and (ii)].

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. [See Section 113(a) and 113(e)(1) of the CAA].

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 on the anniversary of the date of issuance of this permit. 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 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 40 CFR §§ 71.6(c)(5)(iii)(D) and 71.6 (c)(6).

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 § 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.

5.5. Submissions [40 CFR §§ 71.5(d), 71.6, and 71.9]

Any document required to be submitted with this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. All documents required to be submitted, including reports, test data, monitoring data, notifications, and compliance certifications, shall be submitted to:

U.S. EPA, Region 6
Air Enforcement Section, 6EN-A
1445 Ross Avenue
Dallas, TX 75202

while the fee calculation worksheets, and applications for renewals and permit modifications shall be submitted to:

U.S. EPA, Region 6
Air Permits Section, 6PD-R
1445 Ross Avenue
Dallas, TX 75202

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.

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.

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 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 EPA;

5.8.5. Incorporates into this 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 in section 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. [Note to permittee: If these subparagraphs do not apply, please contact EPA for a determination as to similarity prior to submitting your request for an administrative permit amendment under this provision].

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 40 CFR § 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 40 CFR § 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and

a request that such procedures be used; and

5.9.3.4. Completed forms for the permitting authority to use to notify affected States as required under 40 CFR § 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 40 CFR § 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 shield under 40 CFR § 71.6(f) may not extend to minor permit modifications. [See 40 CFR § 71.7(e)(1)(vi)].

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 40 CFR § 71.2, or five tons per year, whichever is least.

5.10.2. An application requesting the use group processing procedures shall be submitted to EPA, shall meet the requirements of 40 CFR § 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 40 CFR § 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 40 CFR § 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 40 CFR § 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.

5.10.4. The permit shield under 40 CFR § 71.6(f) may not extend to group processing of minor permit modifications. [See 40 CFR § 71.7(e)(1)(vi)].

5.11. Significant Permit Modifications [40 CFR § 71.7(e)(3)]

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.

5.11.2. Nothing herein shall be construed to preclude the permittee from making changes consistent with 40 CFR § 71 that would render existing permit compliance terms and conditions irrelevant.

5.11.3. Permittees must meet all requirements of 40 CFR § 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 40 CFR § 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change. [See 40 CFR §§ 71.7(e)(3)(ii) and 71.5(a)(2)].

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 40 CFR § 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.

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.

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.

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.

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 of the CAA 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 40 CFR § 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.

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.

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 part 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 40 CFR § 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 40 CFR § 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.

Appendix A

Cibola County: Threatened, Endangered, and Candidate Species, and Species of Concern

March 28, 2008

Black-footed ferret, Mustela nigripes, E**
Cebolleta southern pocket gopher, Thomomys umbrinus paquatae, SC
American peregrine falcon, Falco peregrinus anatum, SC
Arctic peregrine falcon, Falco peregrinus tundrius, SC
Mexican spotted owl, Strix occidentalis lucida, T W/DCH
Mountain plover, Charadrius montanus, PT
Northern goshawk, Accipiter gentilis, SC
Southwestern willow flycatcher, Empidonax traillii extimus, E
Western burrowing owl, Athene cunicularia hypugaea, SC
Yellow-billed cuckoo, Coccyzus americanus, C
Zuni bluehead sucker, Catostomus discobolus yarrowi, C
Rio Grande sucker, Catostomus plebeius, SC
New Mexico silverspot butterfly, Speyeria nokomis nitocris, SC
Acoma fleabane, Erigeron acomanus, SC
Cinder phacelia, Phacelia serrata, SC
Gypsum phacelia, Phacelia sp. nov./ined., SC
Pecos sunflower, Helianthus paradoxus, T W/PCH
Zuni (=rhizome) fleabane, Erigeron rhizomatus, T

Document # 2

RECEIVED
12 NOV -1 PM 4:52
AIR PERMITS SECTION
6PD-R

ENERGY TRANSFER

October 31, 2012

Ms. Bonnie Braganza
Air, Pesticides and Toxics Division, MC 6PD-R
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Subject: **Part 71 Operating Permit No. R6NM-01-08R1**
Renewal Application
Transwestern Pipeline Company, LLC
Compressor Station No. 6 - Laguna
Cibola County, New Mexico

Dear Ms. Braganza,

On behalf of Transwestern Pipeline Company, LLC (Transwestern), please find enclosed a Part 71 Federal Operating Permit renewal application for the Compressor Station No. 6 - Laguna (the Station) located in Laguna, Cibola County, New Mexico. The Station is located on the Laguna Indian Reservation and is currently operating under the subject Part 71 operating permit. At this time, Transwestern is requesting renewal of the operating permit.

Transwestern appreciates in advance the EPA's review and approval of this Part 71 permit renewal application. If you have any questions regarding the information presented in this letter or the enclosed application, please call me at (972) 722-7791.

Sincerely,

Chris Hansen

Christopher B. Hansen
Environmental Manager
Energy Transfer Company

Enclosure

PART 71 PERMIT RENEWAL APPLICATION

Permit No. R6NM-01-08R1

Transwestern Pipeline Company, LLC
Compressor Station No. 6 Laguna
Laguna, Cibola County, New Mexico

ENERGY TRANSFER PARTNERS
Transwestern Pipeline Company

Project No. 369-12

October 2012

PART 71 OPERATING PERMIT RENEWAL APPLICA'I'ION
TRANSWESTERN PIPELINE COMPANY
COMPRESSOR STATION NO. 6 LAGUNA
PERMIT NO. R6NM-01-08R1
TABLE OF CONTENTS

ATTACHMENT 1
GENERAL AND ADMINISTRATIVE FORMS

PART 71 PERMIT RENEWAL APPLICATON

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name: Compressor Station No. 6 Laguna

Mailing address: Street or P.O. Box: 4001 Indian School Road

City: Albuquerque State: NM ZIP: 87110 -

Contact person: Larry Campbell Title: Senior Environmental Specialist

Telephone: (575) 625 - 8022 Ext.

Facsimile: (575) 627 - 8115

B. Facility Location

Temporary source? ___Yes ___No ☑ Plant site location: 1/2 mile south of Laguna, NM

City: Laguna 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?

Within 50 miles of affected State? __ YES ☑ NO If yes, What State(s)?

C. Owner

Name: Transwestern Pipeline Company Street/P.O. Box: 4001 Indian School Road

City: Albuquerque State: NM ZIP: 87110 -

Telephone: (575) 625 - 8022 Ext

D. Operator

Name: Transwestern Pipeline Company Street/P.O. Box: 4001 Indian School Road

City: Albuquerque State: NM ZIP: 87110 -

Telephone: (575) 625 - 8022 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? 10 /17 /2013

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 _____

Phase II acid rain application submitted? ___YES ___NO If yes, Permitting authority _____

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

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

MACT ZZZZ

H. Process Description

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

Process	Products	SIC
Natural Gas Transmission	Compressed 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 by listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
601	4500-hp Clark TVC-12 RICE, Serial # 107510
602	4500-hp Clark TVC-12 RICE, Serial # 107511
603	4500-hp Clark TVC-12 RICE, Serial # 107512
621	470-hp Waukesha F3520GU RICE, Serial # 129011
T-2	500-bbl Pipeline Liquids (Condensate) Fixed Roof Storage Tank
MIST	1,100-gallon Mist Extractor Vessel

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 1495.7 tons/yr VOC 88.4 tons/yr SO2 0.3 tons/yr

PM-10 21.9 tons/yr CO 454.4 tons/yr Lead _____ tons/yr

Total HAP 34.9 tons/yr

Single HAP emitted in the greatest amount Formaldehyde PTE 25.1 tons/yr

Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE _____ tons/yr

K. Existing Federally-Enforceable Permits

Permit number(s) _____ Permit type _____ Permitting authority _____

Permit number(s) _____ Permit type _____ Permitting authority _____

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit _____

Check one: ___ Application made ___ Coverage granted

General permit identifier _____ Expiration Date ____/____/____

M. Cross-referenced Information

Does this application cross-reference information? ___ YES ☑ NO (If yes, see instructions)

INSTRUCTIONS FOLLOW

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 6/30/2015

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) Ingalls (First) Chad (MI) ____

Title Director of Operations

Street or P.O. Box 4001 Indian School Road

City Albuquerque State NM ZIP 87110

Telephone (575) 347 - 6514 Ext. _____ Facsimile (____) _____ - _____

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) [signature]

Name (typed) Chad Ingalls Date: 10/30/12

ATTACHMENT 2
UNIT ATTRIBUTE FORMS

PART 71 PERMIT RENEWAL APPLICATON

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

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

A. General Information

Emissions unit ID 601 Description 4500-hp Gas-Fired Reciprocating Engine

SIC Code (4-digit) 4922 SCC Code 20200252

B. Emissions Unit Description

Primary use Gas Compression Temporary Source ___Yes X No

Manufacturer Clark Model No. TCV-12

Serial Number 107510 Installation Date ___/___/1967

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

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

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 34.65 MM BTU/hr Max. Design Heat Input 34.65 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) None

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.)
Natural Gas	0	0	1050 btu/scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	255 MMcf	0.035	289 MMscf

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ 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) 40.5	Inside stack diameter (ft) 2.5
Stack temp(°F) 900	Design stack flow rate (ACFM) 15,412
Actual stack flow rate (ACFM) 15412	Velocity (ft/sec) 52.3

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

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

A. General Information

Emissions unit ID 602 Description 4500-hp Gas-Fired Reciprocating Engine

SIC Code (4-digit) 4922 SCC Code 20200252

B. Emissions Unit Description

Primary use Gas Compression Temporary Source ___Yes X No

Manufacturer Clark Model No. TCV-12

Serial Number 107511 Installation Date ___/___/1967

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

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

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 34.65 MM BTU/hr Max. Design Heat Input 34.65 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) None

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.)
Natural Gas	0	0	1050 btu/scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	255 MMcf	0.035	289 MMscf

E. Associated Air Pollution Control Equipment

Emissions unit ID _____ 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)	40.5	Inside stack diameter (ft)	2.5
Stack temp(°F)	900	Design stack flow rate (ACFM)	15,412
Actual stack flow rate (ACFM)	15,412	Velocity (ft/sec)	52.3

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

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

A. General Information

Emissions unit ID 603 Description 4500-hp Gas-Fired Reciprocating Engine

SIC Code (4-digit) 4922 SCC Code 20200252

B. Emissions Unit Description

Primary use Gas Compression Temporary Source ___Yes X No

Manufacturer Clark Model No. TCV-12

Serial Number 107512 Installation Date ___/___/1967

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

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

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 34.65 MM BTU/hr Max. Design Heat Input 34.65 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) None

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.)
Natural Gas	0	0	1050 btu/scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	255 MMcf	0.035	289 MMscf

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ 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) 40.5	Inside stack diameter (ft) 2.5
Stack temp(°F) 900	Design stack flow rate (ACFM) 15,412
Actual stack flow rate (ACFM) 15,412	Velocity (ft/sec) 52.3

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

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

A. General Information

Emissions unit ID 621 Description 470-hp Gas-Fired Reciprocating Engine

SIC Code (4-digit) 4922 SCC Code 20200253

B. Emissions Unit Description

Primary use Electric Generator Temporary Source ___Yes X No

Manufacturer Waukesha Model No. F3520GU

Serial Number 129011 Installation Date ___/___/1967

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

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 4.2 MM BTU/hr Max. Design Heat Input 4.2 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) None

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.)
Natural Gas	0	0	1050 btu/scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	0.40 MMscf	0.004	35.04 MMscf

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ 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) 20.0	Inside stack diameter (ft) 0.5
Stack temp(°F) 900	Design stack flow rate (ACFM) 1,610
Actual stack flow rate (ACFM) 1,610	Velocity (ft/sec) 136.6

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSIONS UNIT DESCRIPTION FOR VOC EMITTING SOURCES (EUD-2)

A. General Information

Emissions unit ID MIST Description 1,100 gallon Fixed Roof Storage Tank

SIC Code (4-digit) 4922 SCC Code 40301009

B. Emissions Unit Description

Equipment type Fixed Roof StorageTank Temporary source: ___Yes X No

Manufacturer Unknown Model No. Unknown

Serial No. Unknown Installation date ____/____/1966

Articles being coated or degreased _____

Application method _____

Overspray (surface coating) (%) _____ Drying method _____

No. of dryers _____ Tank capacity (degreasers) (gal) _____

C. Associated Air Pollution Control Equipment

Emissions unit ID _____ Device Type _____

Manufacturer _____ Model No _____

Serial No. _____ Installation date ____/____/_____

Control efficiency (%) _____.___ Capture efficiency (%) _____.___

Air pollutant(s) controlled _____ Efficiency estimation method _____

D. 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)

E. VOC-containing Substance Data

List each VOC-containing substance consumed, processed or produced at the emissions unit that is emitted into the air. In the name column, if providing a brand name, include the name of the manufacture; if the substance contains HAP, list the constituent HAP.

Substance Name (Chemical, Brand Name)	CAS No.	Substance Type	Actual Usage (gal/yr)	Max Usage (gal/day)	Max Usage (gal/year)	VOC Content (lb/gal)
Natural Gas Condensate	NA	NA	NA	NA	4,200	8.34

Federal Operating Permit Program (40 CFR Part 71)

EMISSIONS UNIT DESCRIPTION FOR VOC EMITTING SOURCES (EUD-2)

A. General Information

Emissions unit ID T-2 Description 500-bbl Fixed Roof Storage Tank

SIC Code (4-digit) 4922 SCC Code 40301009

B. Emissions Unit Description

Equipment type Fixed Roof StorageTank Temporary source: ___Yes X___No

Manufacturer Unknown Model No. Unknown

Serial No. Unknown Installation date ___/___/1966

Articles being coated or degreased _____

Application method _____

Overspray (surface coating) (%) _____ Drying method _____

No. of dryers _____ Tank capacity (degreasers) (gal) _____

C. Associated Air Pollution Control Equipment

Emissions unit ID _____ Device Type _____

Manufacturer _____ Model No _____

Serial No. _____ Installation date ___/___/_____

Control efficiency (%) _____.___ Capture efficiency (%) _____.___

Air pollutant(s) controlled _____ Efficiency estimation method _____

D. 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)

E. VOC-containing Substance Data

List each VOC-containing substance consumed, processed or produced at the emissions unit that is emitted into the air. In the name column, if providing a brand name, include the name of the manufacture; if the substance contains HAP, list the constituent HAP.

Substance Name (Chemical, Brand Name)	CAS No.	Substance Type	Actual Usage (gal/yr)	Max Usage (gal/day)	Max Usage (gal/year)	VOC Content (lb/gal)
Natural Gas Condensate	NA	NA	NA	NA	21,000	8.34

Federal Operating Permit Program (40 CFR Part 71)

INSIGNIFICANT EMISSIONS (IE)

On this page list each insignificant activity or emission unit. In the "number" column, indicate the number of units in this category. Descriptions should be brief but unique. Indicate which emissions criterion of part 71 is the basis for the exemption.

Number	Description of Activities or Emissions Units	RAP, except HAP	HAP
1	Waste Water Heater	✓	✓
1	Fugitive Emissions	✓	✓
3	Clark TCV-1 Engine 601, 602 and 603 Blowdowns & Starters	✓	✓
1	Waukesha Engine F3520GU Blowdowns & Starters	✓	✓
1	210-bbl Oily Water Tank	✓	✓
2	210-bbl Engine Lube Oil Tank	✓	✓
2	65-bbl Ethylene Glycol Tank	✓	✓
1	65-bbl Used Ethylene Glycol Tank	✓	✓
2	65-bbl Used Lube Oil Tank	✓	✓
1	Pipeline Liquids Truck Loading Point	✓	✓
1	Solvent Degreaser	✓	✓

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 601

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)	
Nitrogen Oxides		113.8	498.4	
Carbon Monoxide		34.5	151.2	
NMHC		4.2	18.2	
Sulfur Dioxide		0.02	0.1	
Particulate Matter (PM10)		1.7	7.3	
Formaldehyde		1.9	8.4	
Total HAP		2.7	11.6	

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 602

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)	
Nitrogen Oxides		113.8	498.4	
Carbon Monoxide		34.5	151.2	
NMHC		4.2	18.2	
Sulfur Dioxide		0.02	0.1	
Particulate Matter (PM10)		1.7	7.3	
Formaldehyde		1.9	8.4	
Total HAP		2.7	11.6	

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 603

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)	
Nitrogen Oxides		113.8	498.4	
Carbon Monoxide		34.5	151.2	
NMHC		4.2	18.2	
Sulfur Dioxide		0.02	0.1	
Particulate Matter (PM10)		1.7	7.3	
Formaldehyde		1.9	8.4	
Total HAP		2.7	11.6	

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 621

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)	
Nitrogen Oxides		9.3	0.5	
Carbon Monoxide		15.6	0.8	
NMHC		0.1	0.01	
Sulfur Dioxide		0.002	0.0001	
Particulate Matter (PM10)		0.1	0.004	
Formaldehyde		0.1	0.01	
Total HAP		0.1	0.01	

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 MIST

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)	
Nitrogen Oxides				
Carbon Monoxide				
NMHC		0.3	5.5	
Sulfur Dioxide				
Particulate Matter (PM10)				
Formaldehyde				
Total HAP				

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 T-2

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)	
Nitrogen Oxides				
Carbon Monoxide				
NMHC		6.00	28.17	
Sulfur Dioxide				
Particulate Matter (PM10)				
Formaldehyde				
Total HAP				

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
601	498.4	18.2	0.1	7.3	151.2		11.6
602	498.4	18.2	0.1	7.3	151.2		11.6
603	498.4	18.2	0.1	7.3	151.2		11.6
621	0.46	0.01	0.0001	0.004	0.78		0.01
T-2		28.2					0.1
MIST		5.5					0.02
FACILTY TOTALS	1495.7	88.4	0.3	21.9	454.4		34.9

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): All significant sources

Applicable Requirement (Describe and Cite)

40 CFR part 71: emissions inventory fee, annual certification, and deviation reporting requirements

Compliance Methods for the Above (Description and Citation):

Prepare annual emissions inventories, pay emission fee, submit annual certifications, and deviation reports as needed. Keep records of operating hours, fuel consumption, and tank throughput.

Compliance Status:

X ___ In Compliance: Will you continue to comply up to permit issuance? X ____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): 601, 602, 603, and 621

Applicable Requirement (Description and Citation):

Permit Condition: keep monthly records of fuel consumption and maintenance activities.

Compliance Methods for the Above (Description and Citation):

Recordkeeping

Compliance Status:

X ___ In Compliance: Will you continue to comply up to permit issuance? X ____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

B. SCHEDULE OF COMPLIANCE

Complete this section if you answered "NO" to any of the questions in section A. Also complete this section if required to submit a schedule of compliance by an applicable requirement. Please attach copies of any judicial consent decrees or administrative orders for this requirement.

Unit(s)_____ Requirement_____

Reason for Noncompliance. Briefly explain reason for noncompliance at time of permit issuance or that future-effective requirement will not be met on a timely basis:

Narrative Description of how Source Compliance Will be Achieved. Briefly explain your plan for achieving compliance:

Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS

Only complete this section if you are required to submit one or more schedules of compliance in section B or if an applicable requirement requires submittal of a progress report. If a schedule of compliance is required, your progress report should start within 6 months of application submittal and subsequently, no less than every six months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe):

First Report____/____/___ Frequency of Submittal_____

Contents of Progress Report (describe):

First Report____/____/___ Frequency of Submittal_____

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

This section must be completed once by every source. Indicate when you would prefer to submit compliance certifications during the term of your permit (at least once per year).

Frequency of submittal Annual Beginning 12 /07 /2012

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

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): 621

Applicable Requirement (Describe and Cite)

Standard: 40 CFR §63.6595(a)(1) Comply with the following applicable emission limitations and operating limitations no later than October 19, 2013. 40 CFR §63.6602-Table 2c.6 : Change oil and filter every 500 hours of operation or annually, whichever comes first, Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. 40 CFR §63.6640(b) report each instance in which you did not meet each emission limitation. 40 CFR §63.6625(h), (j) minimize the engine's time spent at idle not to exceed 30 minutes.

Compliance Methods for the Above (Description and Citation):

Monitoring: 40 CFR §63.6625(f) install a non-resettable hour meter. 40 CFR §63.6640(a)-Table 6.9.a Operating and maintaining the stationary RICE according to the manufacturer's instructions.
Recordkeeping: 40 CFR §63.6655(a), (a)(1)-(2), (a)(4)-(5) records of each notification, report, maintenance, occurrence and duration of each malfunction, and actions taken during periods of malfunction. 40 CFR §63.6655(d)-(f) keep records of maintenance and operation hours. 40 CFR §63.6660(a)-(c)y keep records that are suitable form and readily accessible for 5 years.
Reporting: 40 CFR §63.6640(b), (e) report each instance in which you did not meet the requirements. 40 CFR §63.6650(f) report all deviations in a semiannual monitoring report. 40 CFR [G]§63.6640(f) limit use to100 operating hours.

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

X
___ Future-Effective Requirement: Do you expect to meet this on a timely basis? X ____Yes ____No

Emission Unit ID(s):

Applicable Requirement (Description and Citation):

Compliance Methods for the Above (Description and Citation):

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

B. SCHEDULE OF COMPLIANCE

Complete this section if you answered "NO" to any of the questions in section A. Also complete this section if required to submit a schedule of compliance by an applicable requirement. Please attach copies of any judicial consent decrees or administrative orders for this requirement.

Unit(s)_____ Requirement_____

Reason for Noncompliance. Briefly explain reason for noncompliance at time of permit issuance or that future-effective requirement will not be met on a timely basis:

Narrative Description of how Source Compliance Will be Achieved. Briefly explain your plan for achieving compliance:

Schedule of Compliance. Provide a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance, including a date for final compliance.

Remedial Measure or Action	Date to be Achieved

C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS

Only complete this section if you are required to submit one or more schedules of compliance in section B or if an applicable requirement requires submittal of a progress report. If a schedule of compliance is required, your progress report should start within 6 months of application submittal and subsequently, no less than every six months. One progress report may include information on multiple schedules of compliance.

Contents of Progress Report (describe):

First Report____/____/___ Frequency of Submittal_____

Contents of Progress Report (describe):

First Report____/____/___ Frequency of Submittal_____

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

This section must be completed once by every source. Indicate when you would prefer to submit compliance certifications during the term of your permit (at least once per year).

Frequency of submittal Annual Beginning 12 / 07 / 2013

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

ATTACHMENT 3
PROJECT DESECRIPTION / PROJECT DESCRIPTION / APPLICABILITY

PART 71 PERMIT RENEWAL APPLICATON

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

ATTACHMENT 3
PROCESS DESCRIPTION / PROJECT DESCRIPTION / APPLICABILITY

Transwestern Pipeline Company (TWP) Compressor Station No. 6 Laguna (the Station) is a natural gas compression and transmission facility located in Laguna, New Mexico, in Cibola County, approximately ½ mile south of Interstate 40. This Station is located on the Laguna Indian Reservation and is currently authorized to operate under Federal Operating Permit (FOP) No. R6NM-01-08R1. The Station continues to be major for carbon monoxide (CO), oxides of nitrogen (NO_X), hazardous air pollutants (HAPs). The Station's greenhouse gas (GHG) emissions are less than 100,000 tons per year (T/yr).

TWP is requesting that the Environmental Protection Agency (EPA) renew the Station's FOP. There have been no physical or operational changes (i.e., modifications) to the Station since the FOP was issued October 17, 2008. Figure 3-1 is an area map showing the location of the Station and the surrounding area. Figure 3-2 is a plot plan for the Station.

PROCESS DESCRIPTION

Dry natural gas is received at the Station through an inlet line and passes through inlet separators where free liquids are knocked out and collected in storage tanks. Note that because the Station only handles dry natural gas, the liquids collection is minimal. The inlet gas is then compressed by one of three engine driven gas compressors (Unit ID Nos.: 601, 602, and 603). After compression, the natural gas exits the Station. The compressor engines are Clark TVC-12 turbocharged engines rated at 4,500 horsepower (hp) each. These units were installed in 1967 and have not been modified since.

There is one gas-fired engine driven generator (Unit ID No: 621) to provide emergency/backup electric power to the Station. The engine is a Waukesha F3520GU unit rated at 470 hp. This unit was installed in 1967 and has not been modified since. Products of combustion from the compressor and generator engines exhaust through independent stacks.

There are several storage tanks at the Station for storing new and used lube oils, antifreeze (ethylene glycol), oily waste water, and pipeline liquids.

There are several blowdown relief vents located at the Station. These vents are used to relieve gas pressure during an emergency shutdown or during planned shutdown and maintenance events. There are also a pipeline pigging receiver and launcher at the Station. A mist extractor (Unit ID No: MIST) is used to remove liquid from the "flashing" gas during the pigging receiver and launcher operations. This equipment is used periodically to flush accumulations of liquids from the gas pipeline.

The liquids that are collected in the separators are directed to the condensate tank (Unit ID No: T-2). The condensate stored in the tank is periodically trucked out of the Station.

PROJECT DESCRIPTION

As stated previously, there are no physical or operational changes associated with this permit renewal application. However, TWP is updating certain permit representations to more current/accurate information, as follows:

- TWP is updating the storage tank vapor molecular weight to be representative of the EPA Tanks4.0.9d Program vapor properties.

- TWP is updating the storage tanks maximum hourly emission rates to reflect the worst case monthly maximum temperature and vapor pressure taken from the EPA Tanks4.0.9d Program.
- TWP is updating the fugitive equipment component counts to reflect more recent information, which includes adding water/oil and heavy liquid (i.e., lube oil and antifreeze) components.
- TWP is reducing the maximum volatile organic compound (VOC) content of the natural gas to 5 wt%, because the prior representation (7.5 wt%) was overly conservative.
- Emission rates for engine blowdowns and startups have been included as insignificant sources.
- TWP has included the emission rates associated with the 1 MMBtu/hr waste water heater as an insignificant source.

The Station consists of the following equipment:

Significant Sources

- Three 4,500-hp Clark TVC-12 gas compressor engines (Unit ID Nos.: 601, 602,and 603);
- One 470-hp Waukesha F3520GU generator engine (Unit ID No.: 621);
- One 500 barrel pipeline liquids tank (Unit ID No.: T-2); and
- One 1,100-gallon mist extractor vessel (Unit ID: MIST).

Insignificant Sources

- Area fugitive emissions (Unit ID No.: FUG);
- One waste water heater emissions (Unit ID: HEATER-1)
- Engine's blowdowns and starters emissions (Unit ID No.: 601-BDSV, 602-BDSV, 603-BDSV, and 621-BDSV);
- One 210 barrel oily waste water tank (Unit ID No.: T-I);
- Two 65 barrel ethylene glycol (antifreeze) tanks (Unit ID No.: T-3 and T-9);
- Two 210 barrel engine lube oil tanks (Unit ID Nos.: T-4 and T-5);
- One 65 barrel used ethylene glycol (antifreeze) tank (Unit ID No.: T-6);
- Two 65 barrel used oil tanks (Unit ID Nos.: T-7 and T-8);
- One truck loading point (Unit ID: TRUCK); and
- One solvent degreaser.

As per the Part 71 permit application instructions published in June of 1996 and 40 CFR 71.5(c)(II)(ii)(A) and (B), emissions sources can be classified as insignificant if emissions of a regulated pollutant does not exceed 2.0 tons per year, or if emissions of HAP do not exceed 1,000 pounds per year or the de minimus level defined in section 112(g) of the Clean Air Act. Based on this criteria the sources listed above as insignificant meet these requirements.

APPLICABILITY

The TWP Station is located on the Laguna Indian Reservation. The New Mexico Environment Department (NMED) has no jurisdictional authority over facilities located on Indian land. Therefore, the station is not subject to the State Implementation Plan (SIP). The Laguna tribe has no codified air regulations at this time. Therefore, the only requirements potentially applicable to sources located at the Station are federal regulations. Due to the construction date of the facility (1967), there are no sources at the Station which are currently subject to a NSPS. The Waukesha generator engine Unit ID No.: 621 is subject to the MACT ZZZZ standard. Section G of the GIS form summarizes all potentially applicable requirements for the Station.

40 CFR 63

Based on the current AP-42 emission factors for internal combustion engines the Laguna Station is a major source of HAP emissions. The primary HAP is formaldehyde produced as a product of combustion. Since the site is a major source of HAP there are two 40 CFR 63 MACT regulations that may be potentially applicable: Subpart HHH and Subpart ZZZZ.

Subpart HHH imposes requirements on selected sources at natural gas transmission and storage sites. The only affected sources targeted by this regulation are glycol dehydrators. There are no glycol dehydrations at the Laguna Station. Therefore, this regulation is not applicable to this site.

Subpart ZZZZ imposes requirements on reciprocating internal combustion engines (RICE) located at major sources of HAP. Subpart ZZZZ has been amended and became effective October 19, 2010. Existing source RICE engines are defined in the amended 40 CFR §63.6590(a)(1)(ii) as existing if construction of the engine commenced before June 12, 2006. According to 40 CFR §63.6595(a), existing RICE $\leq$ 500 brake HP located at an major source must comply with applicable emission limitations and operating limitations no later than October 19, 2013. Section A of the COMP-1 form summarizes the RICE engine Unit No.: 621 applicable requirements. Subpart ZZZZ exempts existing lean burn engines, Unit No.: 601, 602, and 603.

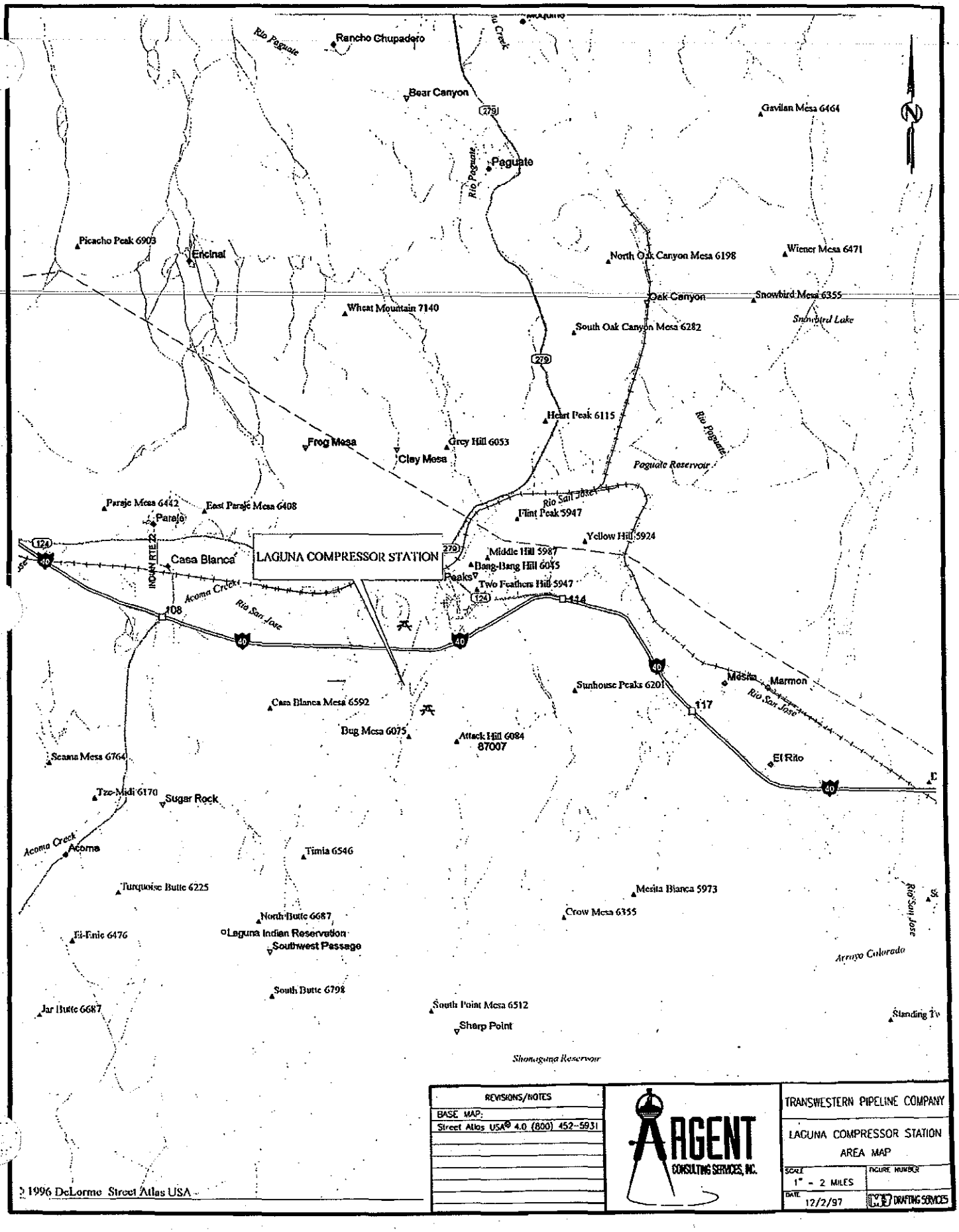
40 CFR 64 Compliance Assurance Monitoring (CAM)

The federal CAM regulation requires certain sources to comply with additional monitoring requirements if specific applicability criteria are met. Those 40 CFR 64.2 (a) criteria are:

- The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under the regulation;
- The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

As represented in past permit applications, the three gas compressor engines and the single backup generator engine are not equipped with control devices used to meet an emission limit or standard. Therefore, CAM continues to not apply to these sources. There are no other sources at the station where CAM could be potentially applicable. Therefore, TWP requests a permit shield for the negative CAM applicability evaluation.

Attachment 4 contains emission rate calculations for each emission source located at the Station.



REVISIONS/NOTES
BASE MAP:
Street Atlas USA® 4.0 (800) 452-5931

ARGENT CONSULTING SERVICES, INC.

TRANSWESTERN PIPELINE COMPANY

LAGUNA COMPRESSOR STATION

AREA MAP

SCALE: 1" = 2 MILES

FIGURE NUMBER:

DATE: 12/2/97

DRAFTING SERVICES

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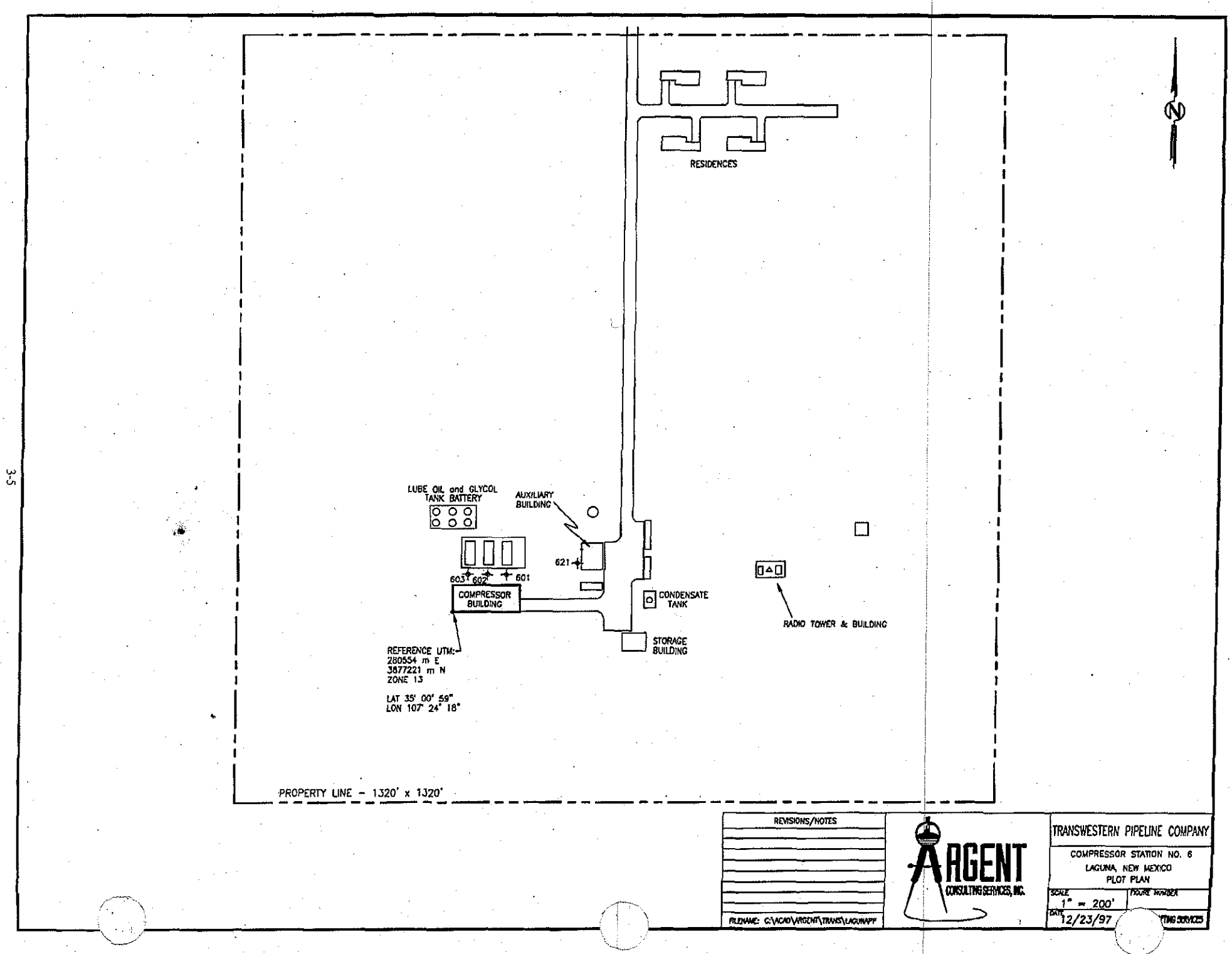
RESIDENCES
LUBE OIL and GLYCOL TANK BATTERY
AUXILIARY BUILDING
621
603
602
601
COMPRESSOR BUILDING
CONDENSATE TANK
STORAGE BUILDING
RADIO TOWER & BUILDING
REFERENCE UTM:-
280554 m E
3877221 m N
ZONE 13
LAT 35° 00' 59"
LON 107° 24' 18"
PROPERTY LINE - 1320' x 1320'
N
REVISIONS/NOTES
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ARGENT CONSULTING SERVICES, INC.
TRANSWESTERN PIPELINE COMPANY
COMPRESSOR STATION NO. 6
LAGUNA, NEW MEXICO
PLOT PLAN
SCALE 1" = 200'
FIGURE NUMBER
DATE 12/23/97

ATTACHMENT 4
CALCULATIONS

PART 71 PERMIT RENEWAL APPLICATON

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

ATTACHMENT 4
CALCULATIONS

COMRPESSOR ENGINES (601, 602, and 603)

Potential emissions from the three compressor engines were estimated under the assumption of continuous operation. Emissions of NOx and CO were calculated using a test value (lb/hr) obtained from similar Clark units located in Arizona. TWP conservatively increased these factors by 20% as a safety factor to cover a wide operating range. All other emission factors were obtained from the current AP-42 factors for 2-cycle lean burn engines.

GENERATOR ENGINE (621)

Potential emissions from the generator engines were estimated under the assumption the source operated no more than 100-hours per year. All emission factors were obtained from the current AP-42 factors for 4-cycle rich burn engines.

CONDENSATE TANK (T-2)

The Station is equipped with a single 21,000 gallon fixed roof storage tank for storing pipeline liquids. The Laguna Station handles only dry natural gas. However, in any pipeline operation liquids may form and collect in the pipe. These liquids are composed mainly of water with some heavier hydrocarbon components. These liquids are carried through the pipe through the movement of gas. The liquids enter the station and are separated from the gas stream in a separator vessel. These liquids are periodically dumped to the storage. On an annual basis the station collects virtually no pipeline liquid. However, for this permit TWP has conservatively assumed that the tank will experience one turnover per year. Working and breathing losses were estimated using the EPA Tank program and conservatively based on gasoline. Flash losses were estimated using the Vasquez-Beggs equation and conservative operating parameters. This method is overly conservative but is currently the only method available since sufficient throughput is not available to allow for sampling.

MIST EXTRACTOR (MIST)

The Station is equipped with a 1,100-gallon mist extractor which acts as storage tank. The mist extractor is used during pipeline pigging operations to remove liquid droplets from the "flashing" of any gas that enters the vessel. Working and breathing losses were estimated using the EPA Tank program and conservatively based on gasoline. Flash losses were estimated using the Vasquez-Beggs equation and conservative operating parameters. Annual emissions were based on 4,200 gallons of year through the mist extractor.

PERMIT RENEWAL

SUMMARY OF POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

		CO Emissions		NO_X Emissions		PM Emissions		SO_2 Emissions		VOC Emissions		CH_2O Emissions		Benzene Emissions		CO_2e	
Stack ID	Description	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)
Normal Operations																	
601	Clark TCV-12	34.52	151.20	113.79	498.40	1.67	7.31	0.02	0.09	4.16	18.22	1.91	8.37	0.07	0.31		17,757.12
602	Clark TCV-12	34.52	151.20	113.79	498.40	1.67	7.31	0.02	0.09	4.16	18.22	1.91	8.37	0.07	0.31		17,757.12
603	Clark TCV-12	34.52	151.20	113.79	498.40	1.67	7.31	0.02	0.09	4.16	18.22	1.91	8.37	0.07	0.31		17,757.12
621	Waukesha F3520GU	15.62	0.78	9.28	0.46	0.08	0.004	0.002	0.0001	0.12	0.01	0.09	0.01	0.01	0.001		24.57
HEATER-1	Waste Water Heater	0.08	0.35	0.10	0.44	0.01	0.04	0.001	0.004	0.01	0.04	0.0001	0.0004	0.000002	0.00001		512.47
FUG	Site Fugitives									0.36	1.34			0.0002	0.001		513.90
MIST	Mist Eliminator									0.29	5.54			0.0003	0.02		2,200.00
T-2	Condensate Tank									6.00	28.17			0.01	0.06		11,080.00
TRUCK	Liquid Loading									50.96	0.04						
Maintenance Operations																	
601-BDSV	Clark TCV-12 Blowdowns & Starters									8.33	0.30			0.01	0.0003		87.58
602-BDSV	Clark TCV-12 Blowdowns & Starters									8.33	0.30			0.01	0.0003		87.58
603-BDSV	Clark TCV-12 Blowdowns & Starters									8.33	0.30			0.01	0.0003		87.58
621-BDSV	Waukesha F3520GU Starters	--	--	--	--	--	--	--	--	6.08	0.02			0.01	0.0000		9.68
	Total Emissions:	**119.26**	**454.73**	**350.75**	**1496.10**	**5.10**	**21.97**	**0.06**	**0.27**	**101.29**	**90.72**	**5.82**	**25.12**	**0.27**	**1.01**		67,874.72

PERMIT RENEWAL

SUMMARY OF HAP POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

Stack ID	Description	HAP Emissions Hourly (lb/hr)	HAP Emissions Annual (T/yr)
Normal Operations			
601	Clark TCV-12	2.65	11.60
602	Clark TCV-12	2.65	11.60
603	Clark TCV-12	2.65	11.60
621	Waukesha F3520GU	0.10	0.01
Heater-1	Waste Water Heater	0.0001	0.0004
FUG	Site Fugitives	0.0002	0.001
MIST	Mist Eliminator	0.0003	0.02
T-2	Condensate Tank	0.010	0.06
TRUCK	Liquid Loading		
Maintenance Operations			
601-BDSV	Clark TCV-12 Blowdown & Starters	0.01	0.0003
602-BDSV	Clark TCV-12 Blowdown & Starters	0.01	0.0003
603-BDSV	Clark TCV-12 Blowdown & Starters	0.01	0.0003
621-BDSV	Waukesha F3520GU Starters	0.01	0.0000
	Total Emissions:	**8.10**	**34.89**

ENGINES POTENTIAL TO EMIT

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

		Engine Ratings			Annual Operating				Potential to Emit (PTE)	
	Description	Type	Rated Horsepower (hp)	Fuel Consumption (Btu/hp-hr)	Fuel Rating (MMBtu/hr)	Hours (hr/yr)	Pollutant	Emission Factors [b]	Units	Hourly [a] (lb/hr)	Annual [b] (T/yr)
Normal Operations											
Stack ID	601 Compressor Engine 1	Compressor Engine 1	4,500	7,900	34.65	8,760	CO	3.48	g/hp-hr	34.52	151.20
		Clark TCV-12					NO_x	11.47	g/hp-hr	113.79	498.40
		2 stroke, lean burn					PM/PM_{10}	0.048810	lb/MMBtu	1.67	7.31
		4,500 hp					SO_2	4	ppm S	0.02	0.09
							VOC	0.12	lb/MMBtu	4.16	18.22
							CH_2O	0.0552	lb/MMBtu	1.91	8.37
							Benzene [b]	0.00194	lb/MMBtu	0.07	0.31
Stack ID	602 Compressor Engine 2	Compressor Engine 2	4,500	7,900	34.65	8,760	CO	3.48	g/hp-hr	34.52	151.20
		Clark TCV-12					NO_x	11.47	g/hp-hr	113.79	498.40
		2 stroke, lean burn					PM/PM_{10}	0.048810	lb/MMBtu	1.67	7.31
		4,500 hp					SO_2	4	ppm S	0.02	0.09
							VOC	0.12	lb/MMBtu	4.16	18.22
							CH_2O	0.0552	lb/MMBtu	1.91	8.37
							Benzene [b]	0.00194	lb/MMBtu	0.07	0.31
Stack ID	603 Compressor Engine 3	Compressor Engine 3	4,500	7,900	34.65	8,760	CO	3.48	g/hp-hr	34.52	151.20
		Clark TCV-12					NO_x	11.47	g/hp-hr	113.79	498.40
		2 stroke, lean burn					PM/PM_{10}	0.048810	lb/MMBtu	1.67	7.31
		4,500 hp					SO_2	4	ppm S	0.02	0.09
							VOC	0.12	lb/MMBtu	4.16	18.22
							CH_2O	0.0552	lb/MMBtu	1.91	8.37
							Benzene [b]	0.00194	lb/MMBtu	0.07	0.31
Stack ID	621 Engine 1	Compressor Engine 1	470	7,750	4.2	100	CO	3.720	lb/MMBtu	15.62	0.78
		Waukesha F3520GU					NO_x	2.21	lb/MMBtu	9.28	0.46
		4 stroke, rich burn					PM/PM_{10}	0.019410	lb/MMBtu	0.08	0.004
		470 hp					SO_2	4	ppm S	0.002	0.0001
							VOC	0.0296	lb/MMBtu	0.12	0.01
							CH_2O	0.0205	lb/MMBtu	0.09	0.005
							Benzene [b]	0.00158	lb/MMBtu	0.01	0.001

[a] For Unit ID 601, 602, and 603 the emission factors for CO and NO_x are from stack tests. The emission factors for VOC, CH_2O, and Benzene are from AP-42 Table 3.2-1 (dated 7/00). For Unit ID 621, the emission factors are from AP-42 Table 3.2-3 (dated 7/00). An example calculation for hourly CO emissions for Unit ID 601 follows:

CO (lb/hr) = (Rated Horsepower, hp)*(Emission Factor, g/hp-hr)*(1 lb/453.59 g)

CO (lb/hr) = (4500 hp)*(3.48 g/hp-hr)*(1 lb/453.59 g)

= 34.52 lb/hr CO

The PM/PM_{10} emission factors are from AP-42 Table 3.2-1 (dated 7/00). An example calculation for hourly PM emissions for Unit ID 601 follows:

PM (lb/hr) = (Fuel Rating, MMBtu/hr)*(Emission Factor, lb/MMBtu)

PM (lb/hr) = (34.65 MMBtu/hr)*(0.048810 lb/MMBtu)

= 1.67 lb/hr PM

A material balance approach was used to estimate the SO_2 emission rates using the maximum sulfur concentration in the natural gas. An example calculation for hourly SO_2 emissions for Unit ID 601 follows:

SO_2 (lb/hr) = (Fuel Consumption, Btu/hp-hr)*(Rated Horsepower, hp)/(Lower Fuel Heating Value, Btu/scf)*(Sulfur Content, ppmv)*(1 lb-mol/379 scf)*(lbmol SO_2/lb-mol S)*(64.06 lb SO_2/lbmol SO_2)

SO_2 (lb/hr) = (7,900 Btu/hp-hr)*(4500 hp)/(1015 Btu/scf)*(4 scf/10^6 scf gas)*(1 lb-mol/379 scf)*(lbmol SO2/lb-mol S)*(64.06 lb SO2/lbmol SO2)

= 0.02 lb/hr SO_2

[b] An example calculation for annual CO emissions for Unit ID 601 follows:

CO (T/yr) = (Hourly PTE, lb/hr)*(Annual Operating Hours, hr/yr)*(1 T/2,000 lb)

CO (T/yr) = (34.52 lb/hr)*(8,760 hr/yr)*(1 T/2,000 lb)

= 151.20 T/yr CO

ENGINES SPECIATED VOC EMISSIONS

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

	AP-42 Emission Factor [a] (lb/MMBtu)	Compressor Engine 601, 602, and 603			
		Heat Input		Actual Emissions	
		Annual (MMBtu/yr)	Max Hourly (MMBtu/hr)	Annual (T/yr)	Max Hourly (lb/hr)
		303,534	34.65		
Acetaldehyde [b]	0.00776			1.1777	0.2689
Acrolein [b]	0.00778			1.1807	0.2696
Toluene [b]	0.000963			0.1462	0.0334
Methanol [b]	0.00248			0.3764	0.0859
Xylene [b]	0.000268			0.0407	0.0093
n-Butane	0.00475			0.7209	0.1646
Isobutane	0.00375			0.5691	0.1299
n-Pentane	0.00153			0.2322	0.0530
Propane	0.02870			4.3557	0.9945
VOC-u (remainder)				1.0504	0.1709

[a] Emission factors are from AP-42 Table 3.2-1 (dated 7/00).

[b] HAP

HEATER POTENTIAL TO EMIT

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

		Description	Rated Duty (MMBtu/hr)	Higher Fuel Heating Value (Btu/scf)	Annual Operating Hours (hr/yr)	Pollutant		Emission Factor [a]	Unit	Allowable Emission Rates Hourly [b] (lb/hr)	Allowable Emission Rates Annual [c] (T/yr)
Stack ID	HEATER-1	Waste Water Heater	1.00	1,050	8,760	CO		84	lb/MMscf	0.08	0.35
						NO_X		100	lb/MMscf	0.10	0.44
						PM	[d]	7.6	lb/MMscf	0.01	0.04
						SO_2	[e]	4.0	ppm	0.001	0.004
						VOC		5.5	lb/MMscf	0.01	0.04
						CH_2O		0.075	lb/MMscf	0.0001	0.0004
						Benzene		0.0021	lb/MMscf	0.000002	0.00001

[a] Unless otherwise noted, emission factors are from AP-42 Tables 1.4-1, 1.4-2, and 1.4-3 (dated 7/98).

[b] An example calculation for hourly CO emissions follows:

CO (lb/hr) = (Rated Duty, MMBtu/hr)/(Fuel Heating Value, Btu/scf)*(Emission Factor, lb/MMscf)

CO (lb/hr) = (1.00 MMBtu/hr)/(1050 Btu/scf)*(84 lb/MMscf)

= 0.08 lb/hr CO

[c] An example calculation for annual CO emissions follows:

CO (T/yr) = (Hourly CO Emission Rate, lb/hr)*(Annual Operating Hours, hr/yr)/(2,000 lb/T)

CO (T/yr) = (0.08 lb/hr)*(8,760 hr/yr)/(2,000 lb/T)

= 0.35 T/yr CO

[d] All PM is assumed to be less than 2.5 microns in diameter per footnote "e" of AP-42 Table 1.4-2.

[e] A material balance approach was used to estimate the SO_2 emission rates using the maximum sulfur concentration in the natural gas.

SO_2 (lb/hr) = (Rated Duty, MMBtu/hr)/(Fuel Heating Value, Btu/scf)*(4 scf S/MMscf gas)*(1 lb-mol/379 scf)*(32.06 lb S/lb-mol)*(64.06 lb SO_2/32.06 lb S)

SO_2 (lb/hr) = (1.00 MMBtu/hr)/(1050 Btu/scf)*(4.0 scf S/MMscf gas)*(1 lb-mol/379 scf)*(32.06 lb S/lb-mol)*(64.06 lb SO2/32.06 lb S)

= 0.001 lb/hr SO_2

GREENHOUSE GAS POTENTIAL TO EMIT FOR COMBUSTION SOURCES

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

Combustion-Related Green House Gas Emissions

Combustion Source ID	HP	Btu/hp-hr	MMBtu/hr	Annual Operating Hours	Fuel Usage MMBtu/Term	CO_2e[a] metric T/yr	CO_2e[a] short T/yr	GHG Mass[a] short T/yr
601	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
602	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
603	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
621	470	7,750	4.20	100	420.00	22.29	24.57	24.55
Heater-1	--	--	1.00	8,760	8,760.00	464.91	512.47	511.98
SITE TOTAL			**109.15**	---	**919,782.00**	**48,814.68**	**53,808.40**	**53,756.80**

[a]Sample calculations:

Greenhouse Gas (GHG) Emission Factors from Tables C-1 and C-2 of 40 CFR 98, Subpart C, are as follows:

Carbon Dioxide Emission Factor (CO_2EF) = 53.02 kg/MMBtu
Methane Emission Factor (CH_4EF) = 0.001 kg/MMBtu
Nitrous Oxide Emission Factor (N_2OEF) = 0.0001 kg/MMBtu

An example calculation for carbon dioxide equivalent CO_2e in metric T/yr for ID 601 follows:
CO_2e (metric T/yr) = (0.001 metric T/kg)*(Fuel usage, MMBtu/yr))*[(CO_2EF + 21*CH_4EF + 310*N_2OEF), kg/MMBtu]
CO2e (metric T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (21*0.001 kg/MMBtu) + (310*0.0001 kg/MMBtu)] = 16,109.16 metric T/yr

An example calculation for CO_2e in short T/yr for ID 601 follows:
CO_2e (short T/yr) = (0.001 metric T/kg) * (Fuel usage, MMBtu/yr)) * [(CO_2EF + 21*CH_4EF + 310*N_2OEF), kg/MMBtu] * (2,204.6 lb/metric T) / (2,000 lb/short T)
CO2e (short T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (21*0.001 kg/MMBtu) + (310*0.0001 kg/MMBtu)] * (2,204.6 lb/metric T) / (2,000 lb/short T) = 17,757.12 short T/yr

An example calculation for GHG Mass in short T/yr for ID 601 follows:
GHG Mass (short T/yr) = (0.001 metric T/kg) * (Fuel usage, MMBtu/yr) * (CO_2EF+CH_4EF+N_2OEF) * (2,204.6 lb/metric T) / (2,000 lb/short T)
GHG Mass (short T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (0.001 kg/MMBtu) + (0.0001 kg/MMBtu)] * (2,204.6 lb/metric T) / (2,000 lb/short T) = 17,740.09 short T/yr

BLOWDOWNS AND STARTERS POTENTIAL TO EMIT

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

Description	Facility ID: 601, 602, and 603 Compressor Engines		Facility ID: 621 Compressor Engine
	Blowdowns	Starters	Starters
Number of Events per Year	72	216	24
Number of Events per Hour	1	3	3
Volume per Event, scf	1000	900	900
Gas Stream Specific Gravity	0.5920	0.5920	0.5920
Gas Stream Density, lb/scf [a]	0.045	0.045	0.045
Max VOC Percentage in Gas Stream, wt%	5.00%	5.00%	5.00%
Max Benzene Percentage in Gas Stream, wt%	0.005%	0.005%	0.005%
Max Carbon Dioxide Percentage in Gas Stream, wt%	5.00%	5.00%	5.00%
Max Methane Percentage in Gas Stream, wt%	95.00%	95.00%	95.00%
Hourly VOC Emission Rates (lb/hr): [b]	2.25	6.08	6.08
Annual VOC Emission Rates (T/yr): [c]	0.08	0.22	0.02
Hourly Benzene Emission Rates (lb/hr):	0.002	0.01	0.01
Annual Benzene Emission Rates (T/yr):	0.0001	0.0002	0.00002
Annual Carbon Dioxide Emission Rates (T/yr):	0.08	0.22	0.02
Annual Methane Emission Rates (T/yr):	1.54	4.16	0.46

[a] Gas stream density is calculated as follows:

(28.96 lb/mole) / (379 scf/mole) * (0.5920) = 0.045 lb/scf

[b] Hourly blowdown VOC emission rates are calculated as follows:

(1 events/hr) * (1,000 scf/event) * (0.045 lb/scf) * (5.00 % VOC) = 2.25 lb/hr

[c] Annual blowdown VOC emission rates are calculated as follows:

(72 events/yr) * (1,000 scf/event) * (0.045 lb/scf) * (5.00 % VOC) / (2,000 lb/T) = 0.08 T/yr

SITE FUGITIVES POTENTIAL TO EMIT
POTENTIAL TO EMIT
COMPRESSOR STATION NO. 6 LAGUNA
TRANSWESTERN PIPELINE COMPANY, LLC

Component	Number of Components	Emission Factors [a] (lb/hr-component)	Annual Operating Hours (hr/yr)	Maximum VOC (wt%)	Maximum Benzene (wt%)	Maximum Carbon Dioxide (wt%)	Maximum Methane (wt%)	Reduction Credit [a] (wt%)	PTE VOC		PTE Benzene		PTE Carbon Dioxide	PTE Methane
									Hourly [b] (lb/hr)	Annual [c] (T/yr)	Hourly [b] (lb/hr)	Annual [c] (T/yr)	Annual [c] (T/yr)	Annual [c] (T/yr)
Valves														
Gas Streams (Non-Monitored)	416	0.00992	8,760	5.0%	0.005%	5.00%	95.00%	0%	0.21	0.90	0.0002	0.0009	0.90	17.17
Water/Light Oil Streams (Non-Monitored)	33	0.000216	8,760	100.0%	0.000%	0.000%	0.000%	0%	0.007	0.031	0.00	0.00	0.00	0.00
Heavy Oil Streams (Non-Monitored)	20	0.0000185	8,760	100.0%	0.000%	0.000%	0.000%	0%	0.00	0.00	0.00	0.00	0.00	0.00
Relief Valves														
Gas Streams (Non-Monitored)	21	0.0194	8,760	5.0%	0.005%	5.00%	95.00%	0%	0.020	0.09	0.00002	0.0001	0.09	1.70
Flanges														
Gas Streams (Non-Monitored)	1248	0.00086	8,760	5.0%	0.005%	5.00%	95.00%	0%	0.1	0.2	0.00	0.00	0.24	4.47
Water/Light Oil Streams (Non-Monitored)	66	0.000006	8,760	100.0%	0.000%	0.000%	0.000%	0%	0.0	0.0	0.00	0.00	0.00	0.00
Compressor Seals														
Gas Streams (Non-Monitored)	5	0.0194	8,760	5.0%	0.005%	5.00%	95.00%	0%	0.005	0.02	0.000005	0.00002	0.02	0.40
Connectors														
Gas Streams (Non-Monitored)	365	0.00044	8,760	5.0%	0.005%	5.00%	95.00%	0%	0.008	0.04	0.00001	0.00004	0.04	0.67
Water/Light Oil Streams (Non-Monitored)	53	0.000243	8,760	100.0%	0.000%	0.000%	0.000%	0%	0.01	0.06	0.00	0.00	0.00	0.00
Heavy Oil Streams (Non-Monitored)	50	0.0000165	8,760	100.0%	0.000%	0.000%	0.000%	0%	0.00	0.00	0.00	0.00	0.00	0.00
Pumps														
Water/Light Oil Streams (Non-Monitored)	2	0.000052	8,760	100.0%	0.000%	0.000%	0.000%	0%	0.0001	0.0005	0.00	0.00	0.00	0.00
								TOTALS:	0.36	1.34	0.0002	0.001	1.29	24.41

[a] Fugitive Emission Factors and Reduction Credits are per TCEQ Technical Guidance Document for Equipment Leak Fugitives, dated October 2000.

[b] Hourly VOC emission rates are calculated as follows:
(416 components) * (0.00992 lb/hr-component) * (5.00 % VOC) * (100% - 0.0 % reduction credit) = 0.21 lb/hr

[c] Annual VOC emission rates are calculated as follows:
(416 components) * (0.00992 lb/hr-component) * (8,760 hr/yr) * (5.00 % VOC) * (100% - 0.0 % reduction credit) / (2,000 lb/T) = 0.90 T/yr

FLASHING FROM THE CONDENSATE TANK
POTENTIAL TO EMIT
COMPRESSOR STATION NO. 6 LAGUNA
TRANSWESTERN PIPELINE COMPANY, LLC

Company Name:	**Transwestern Pipeline Company**	Permit No.:	**R6NM-01-08R1**
Facility Name:	**Laguna Compressor Station**	Date:	**September 26, 2012**

Volatile Organic Compound Emission Calculation for Flashing from the Condensate Tank

Vasquez - Beggs Solution Gas/Oil Ratio Correlation Method

(For Estimating VOC Flashing Emissions, Using Stock Tank Gas-Oil Ratios For Crude Oil Facilities)

INPUTS:

Stock Tank API Gravity	**50.00**	**API**
Separator Pressure (psig)	**700.00**	**P**
Separator Temperature (°F)	**70.00**	**Ti**
Separator Gas Gravity at Initial Condition	**1.18**	**SGi**
Stock Tank Barrels of Oil per day (BOPD)	1.37	**Q**
Stock Tank Gas Molecular Weight	**69.00**	**MW**
Fraction VOC (C3+) of Stock Tank Gas	**0.95**	**VOC**
Atmospheric Pressure (psia)	14.70	**Patm**

CONSTRAINTS:

16.00	**>API>**	**58.00**	**°API**
50.00	**>P+Patm>**	**5250.00**	**(psia)**
70.00	**> Ti >**	**295.00**	**(°F)**
0.56	**>SGi>**	**1.18**	**(MW/28.97)**
None	**> Q >**	**None**	**(BOPD)**
18.00	**>MW>**	**125.00**	**(lb/lb-mole)**
0.50	**>Voc>**	**1.00**	**Fraction**
20.00	**> Rs >**	**2070.00**	**(scf/STB)**

SGx = Dissolved gas gravity at 100 psig = SGi [1.0+0.00005912*API*Ti*Log(Pi/114.7)]

SGx =	**1.37**

Rs = (C1 * SGx * Pi^C2) exp ((C3 * API) / (Ti + 460))

Where:

Rs	Gas/Oil Ratio of liquid at pressure of interest
SGx	Dissolved gas gravity at 100 psig
Pi	Pressure of initial condition (psia)
API	API Gravity of liquid hydrocarbon at final condition
Ti	Temperature of initial condition (F)

Constants

	°API Gravity		
°APTI →	**< 30**	**>= 30**	Given °API
C1	0.04	0.02	**0.04**
C2	1.09	1.19	**1.09**
C3	25.72	23.93	**25.72**

Rs =	**652.53**	**scf/bbl**	***for P + Patm =***	***714.70***

THC = Rs * Q * MW * 1/385 scf/lb-mole * 365 D/Yr * 1 ton/2000 lb.s

THC	Total Hydrocarbon (tons/year)
Rs	Solution Gas/Oil Ratio (scf/STB)
Q	Oil Production Rate (bbl/day)
MW	Molecular Weight of Stock Tank Gas (lb/lb-mole)
385.00	Volume of 1 lb-mole of gas at 14.7 psia and 68 F (WAQS&R Std Cond)

THC =	**29.2**	**TPY**

VOC = THC * Frac. of C3+ in the Stock Tank Vapor

VOC =	**27.7**	**TPY**	***from "FLASHING" of oil from separator to tank press***

FLASHING FROM THE MIST ELIMINATOR
POTENTIAL TO EMIT
COMPRESSOR STATION NO. 6 LAGUNA
TRANSWESTERN PIPELINE COMPANY, LLC

Company Name:	**Transwestern Pipeline Company**	Permit No.:	**R6NM-01-08R1**
Facility Name:	**Laguna Compressor Station**	Date:	**September 26, 2012**

Volatile Organic Compound Emission Calculation for Flashing from the Mist Eliminator

Vasquez - Beggs Solution Gas/Oil Ratio Correlation Method

(For Estimating VOC Flashing Emissions, Using Stock Tank Gas-Oil Ratios For Crude Oil Facilities)

INPUTS:

Stock Tank API Gravity	**50.00**	**API**
Separator Pressure (psig)	**700.00**	**P**
Separator Temperature (°F)	**70.00**	**Ti**
Separator Gas Gravity at Initial Condition	**1.18**	**SGi**
Stock Tank Barrels of Oil per day (BOPD)	0.27	**Q**
Stock Tank Gas Molecular Weight	**69.00**	**MW**
Fraction VOC (C3+) of Stock Tank Gas	**0.95**	**VOC**
Atmospheric Pressure (psia)	14.70	**Patm**

CONSTRAINTS:

16.00	**>API>**	**58.00**	**°API**	ok
50.00	**>P+Patm>**	**5250.00**	**(psia)**	ok
70.00	**> Ti >**	**295.00**	**(°F)**	ok
0.56	**>SGi>**	**1.18**	**(MW/28.97)**	ok
None	**> Q >**	**None**	**(BOPD)**	ok
18.00	**>MW>**	**125.00**	**(lb/lb-mole)**	ok
0.50	**>Voc>**	**1.00**	**Fraction**	ok
20.00	**> Rs >**	**2070.00**	**(scf/STB)**	ok

SGx = Dissolved gas gravity at 100 psig = SGi [1.0+0.00005912*API*Ti*Log(Pi/114.7)]

SGx =	**1.37**

Rs = (C1 * SGx * Pi^C2) exp ((C3 * API) / (Ti + 460))

Where:

Rs	Gas/Oil Ratio of liquid at pressure of interest
SGx	Dissolved gas gravity at 100 psig
Pi	Pressure of initial condition (psia)
API	API Gravity of liquid hydrocarbon at final condition
Ti	Temperature of initial condition (F)

Constants

	°API Gravity		
°APIT →	**< 30**	**>= 30**	Given °API
C1	0.04	0.02	**0.04**
C2	1.09	1.19	**1.09**
C3	25.72	23.93	**25.72**

Rs =	**652.53**	**scf/bbl**	***for P + Patm =***	***714.70***

THC = Rs * Q * MW * 1/385 scf/lb-mole * 365 D/Yr * 1 ton/2000 lb.s

THC	Total Hydrocarbon (tons/year)
Rs	Solution Gas/Oil Ratio (scf/STB)
Q	Oil Production Rate (bbl/day)
MW	Molecular Weight of Stock Tank Gas (lb/lb-mole)
385.00	Volume of 1 lb-mole of gas at 14.7 psia and 68 F (WAQS&R Std Cond)

THC =	**5.8**	**TPY**	(Assumes Continuous Operation)

VOC = THC * Frac. of C3+ in the Stock Tank Vapor

VOC =	**5.5**	**TPY**	***from "FLASHING" of oil from separator to tank press from pigging activities***

FIXED ROOF TANK MAXIMUM HOURLY WORKING LOSSES

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

Working Loss Formula:

Lw (lb/hour) = (0.001)(Mw)(P)(Q)(Kn)(Kp)

Where:

Lw = Storage Tank Working Losses, lb/hr
MW = Molecular Weight of Vapor in Storage Tank, lb/lb-mole
Pmax = True Vapor Pressure at Daily Maximum Liquid Surface Temperature, psia
Q = Hourly Throughput, bbl/hour
Kn = Turnover Factor from AP-42 , dimensionless
Kp = Product Factor, dimensionless. Kp equal 1.0 for liquids and Kp equal 0.75 for crude oil
DRE = Destruction efficiency of the control device, %

Tank ID	Material Stored	Capacity (gal)	Max. Loading Rate (gal/hr)	MW (lb/lb-mol)	Pmax (psia)	Q (bbl/hour)	Kn (unitless)	Kp (unitless)	Lw (lb/hr)	DRE (%)	Emissions (lb/hr)
T-2	Condensate	21,000	875	69	4.1397	21	1.0	1.00	6.00	**0%**	**6.00**
MIST	Condensate	1,100	46	69	4.1397	1	1.0	1.0	0.29	**0%**	**0.29**

SUMMARY OF STORAGE TANKS EMISSIONS

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

		EPA Tanks 4.0.9d[a]		Maximum[b]	Flash Emissions[c] VOC		Flash Emissions[c] Benzene		VOC[d] Emissions		Benzene Emissions		Carbon Dioxide Emissions		Methane Emissions		CO_2e[e] Emissions
Unit ID	Description	Working Loss (lb/yr)	Breathing Loss (lb/yr)	Hourly Loss lb/hr	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Annual (T/yr)
T2	Condensate	56.11	883.53	6.00	0.003	27.70	0.000003	0.03	6.00	28.17	0.01	0.06	0.003	27.70	0.06	526.30	11,080.00
MIST	Condensate	19.64	54.41	0.29	0.001	5.50	0.000001	0.01	0.29	5.54	0.0003	0.02	0.001	5.50	0.02	104.50	2,200.00

[a] These working and breathing emissions are calculated using EPA Tanks 4.0.9d program found on the following pages. A conservative Gasoline RVP of 6 is used to represent the material in the tank and mist eliminator.

[b] The hourly emissions for the tanks are from the Fixed Roof Tank Maximum Hourly Working Losses Calculation sheet.

[c] Vasquez - Beggs Solution Gas/Oil Ratio Correlation Method was used to calculate flash emissions for VOC.

[d] An example calculation of the hourly VOC emissions for Unit ID T-2 follows:

VOC (lb/hr) = (Maximum Hourly Emission Loss, lb/hr)+(Vasquez-Beggs Tanks Hourly Emissions, lb/hr)

VOC (lb/hr) = (6.00 lb/yr) + (0.003 lb/hr)

= 6.00 lb/hr

[d] An example calculation of the annual VOC emissions for Unit ID T-2 follows:

VOC (T/yr) = ((Working Loss, lb/yr)+(Breathing Loss, lb/yr))/(2,000 ton/yr)+(Vasquez-Beggs Tanks Annual Emissions, T/yr)

VOC (T/yr) = ((56.11 lb/yr)+(883.53 lb/yr))/(2,000 lb/ton)+(27.70 T/yr)

= 28.17 T/yr

[e] An example calculation of annual CO_2e emissions for Unit ID T-2 follows:

CO_2e (T/yr) = ((526.30 T/yr Methane) * 21) + (27.70 T/Yr CO_2)

= 11,080.00 T/yr

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	Laguna Mist Eliminator 1,100 gallon
City:	Albuquerque
State:	New Mexico
Company:	Transwestern Pipeline Company, LLC
Type of Tank:	Vertical Fixed Roof Tank
Description:	Laguna - Mist Eliminator Vessel Capacity 1,100 gallon vessel

Tank Dimensions

Shell Height (ft):	7.00
Diameter (ft):	5.00
Liquid Height (ft) :	5.00
Avg. Liquid Height (ft):	5.00
Volume (gallons):	1,000.00
Turnovers:	4.20
Net Throughput(gal/yr):	4,200.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good
Roof Color/Shade:	White/White
Roof Condition:	Good

Roof Characteristics

Type:	Cone
Height (ft)	0.00
Slope (ft/ft) (Cone Roof)	0.00

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meterological Data used in Emissions Calculations: Albuquerque, New Mexico (Avg Atmospheric Pressure = 12.15 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

Laguna Mist Eliminator 1,100 gallon - Vertical Fixed Roof Tank
Albuquerque, New Mexico

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Gasoline (RVP 6)	All	58.54	51.41	65.66	56.17	2.8464	2.4472	3.2971	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3

TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)

Laguna Mist Eliminator 1,100 gallon - Vertical Fixed Roof Tank
Albuquerque, New Mexico

Annual Emission Calculations	
Standing Losses (lb):	54.4073
Vapor Space Volume (cu ft):	39.2699
Vapor Density (lb/cu ft):	0.0353
Vapor Space Expansion Factor:	0.1399
Vented Vapor Saturation Factor:	0.7682
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	39.2699
Tank Diameter (ft):	5.0000
Vapor Space Outage (ft):	2.0000
Tank Shell Height (ft):	7.0000
Average Liquid Height (ft):	5.0000
Roof Outage (ft):	0.0000
Roof Outage (Cone Roof)	
Roof Outage (ft):	0.0000
Roof Height (ft):	0.0000
Roof Slope (ft/ft):	0.0000
Shell Radius (ft):	2.5000
Vapor Density	
Vapor Density (lb/cu ft):	0.0353
Vapor Molecular Weight (lb/lb-mole):	69.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.8464
Daily Avg. Liquid Surface Temp. (deg. R):	518.2062
Daily Average Ambient Temp. (deg. F):	58.1542
Ideal Gas Constant R (psia cuft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	515.8442
Tank Paint Solar Absorptance (Shell):	0.1700
Tank Paint Solar Absorptance (Roof):	0.1700
Daily Total Solar Insulation Factor (Btu/sq ft/day):	1,765.3167
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.1399
Daily Vapor Temperature Range (deg. R):	28.5089
Daily Vapor Pressure Range (psia):	0.8498
Breather Vent Press. Setting Range(psia):	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.8464
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	2.4472
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	3.2971
Daily Avg. Liquid Surface Temp. (deg R):	518.2062
Daily Min. Liquid Surface Temp. (deg R):	511.0790
Daily Max. Liquid Surface Temp. (deg R):	525.3334
Daily Ambient Temp. Range (deg. R):	27.9250
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.7682
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.8464

Vapor Space Outage (ft):	2.0000
Working Losses (lb):	19.6399
Vapor Molecular Weight (lb/lb-mole):	69.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.8464
Annual Net Throughput (gal/yr.):	4,200.0000
Annual Turnovers:	4.2000
Turnover Factor:	1.0000
Maximum Liquid Volume (gal):	1,000.0000
Maximum Liquid Height (ft):	5.0000
Tank Diameter (ft):	5.0000
Working Loss Product Factor:	1.0000
Total Losses (lb):	74.0472

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: Annual

Laguna Mist Eliminator 1,100 gallon - Vertical Fixed Roof Tank
Albuquerque, New Mexico

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Gasoline (RVP 6)	19.64	54.41	74.05

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	Laguna T-2
City:	Albuquerque
State:	New Mexico
Company:	Transwestern Pipeline Company, LLC
Type of Tank:	Vertical Fixed Roof Tank
Description:	Laguna - T-2 Condensate Tank 21,000 gallon vessel

Tank Dimensions

Shell Height (ft):	25.00
Diameter (ft):	12.00
Liquid Height (ft) :	13.00
Avg. Liquid Height (ft):	12.50
Volume (gallons):	12,000.00
Turnovers:	1.00
Net Throughput(gal/yr):	12,000.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good
Roof Color/Shade:	White/White
Roof Condition:	Good

Roof Characteristics

Type:	Cone
Height (ft)	0.00
Slope (ft/ft) (Cone Roof)	0.00

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meterological Data used in Emissions Calculations: Albuquerque, New Mexico (Avg Atmospheric Pressure = 12.15 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

Laguna T-2 - Vertical Fixed Roof Tank
Albuquerque, New Mexico

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Gasoline (RVP 6)	All	58.54	51.41	65.66	56.17	2.8464	2.4472	3.2971	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3

TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)

Laguna T-2 - Vertical Fixed Roof Tank
Albuquerque, New Mexico

Annual Emission Calculations	
Standing Losses (lb):	883.5304
Vapor Space Volume (cu ft):	1,413.7167
Vapor Density (lb/cu ft):	0.0353
Vapor Space Expansion Factor:	0.1399
Vented Vapor Saturation Factor:	0.3465
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	1,413.7167
Tank Diameter (ft):	12.0000
Vapor Space Outage (ft):	12.5000
Tank Shell Height (ft):	25.0000
Average Liquid Height (ft):	12.5000
Roof Outage (ft):	0.0000
Roof Outage (Cone Roof)	
Roof Outage (ft):	0.0000
Roof Height (ft):	0.0000
Roof Slope (ft/ft):	0.0000
Shell Radius (ft):	6.0000
Vapor Density	
Vapor Density (lb/cu ft):	0.0353
Vapor Molecular Weight (lb/lb-mole):	69.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.8464
Daily Avg. Liquid Surface Temp. (deg. R):	518.2062
Daily Average Ambient Temp. (deg. F):	56.1542
Ideal Gas Constant R (psia cuft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	515.8442
Tank Paint Solar Absorptance (Shell):	0.1700
Tank Paint Solar Absorptance (Roof):	0.1700
Daily Total Solar Insulation Factor (Btu/sqft day):	1,765.3167
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.1399
Daily Vapor Temperature Range (deg. R):	28.5089
Daily Vapor Pressure Range (psia):	0.8498
Breather Vent Press. Setting Range(psia):	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.8464
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	2.4472
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	3.2971
Daily Avg. Liquid Surface Temp. (deg R):	518.2062
Daily Min. Liquid Surface Temp. (deg R):	511.0790
Daily Max. Liquid Surface Temp. (deg R):	525.3334
Daily Ambient Temp. Range (deg. R):	27.9250
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.3465
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.8464

Vapor Space Outage (ft):	12.5000
Working Losses (lb):	56.1141
Vapor Molecular Weight (lb/lb-mole):	69.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.8464
Annual Net Throughput (gal/yr.):	12,000,0000
Annual Turnovers:	1.0000
Turnover Factor:	1.0000
Maximum Liquid Volume (gal):	12,000.0000
Maximum Liquid Height (ft):	13.0000
Tank Diameter (ft):	12.0000
Working Loss Product Factor:	1.0000
Total Losses (lb):	939.6446

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: Annual

Laguna T-2 - Vertical Fixed Roof Tank
Albuquerque, New Mexico

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Gasoline (RVP 6)	56.11	883.53	939.64

TANKS 4.0.9d
Emissions Report - Detail Format
Total Emissions Summaries - All Tanks in Report

Emissions Report for: Annual

Tank Identification				Losses (lbs)
Laguna Mist Eliminator 1,100 gallon	Transwestern Pipeline Company, LLC	Vertical Fixed Roof Tank	Albuquerque, New Mexico	74.05
Laguna T-2	Transwestern Pipeline Company, LLC	Vertical Fixed Roof Tank	Albuquerque, New Mexico	939.64
Total Emissions for all Tanks:				1,013.69

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	Laguna Mist Eliminator 1,100 gallon
City:	Albuquerque
State:	New Mexico
Company:	Transwestern Pipeline Company, LLC
Type of Tank:	Vertical Fixed Roof Tank
Description:	Laguna - Mist Eliminator Vessel Capacity 1,100 gallon vessel

Tank Dimensions

Shell Height (ft):	7.00
Diameter (ft):	5.00
Liquid Height (ft) :	5.00
Avg. Liquid Height (ft):	5.00
Volume (gallons):	1,000.00
Turnovers:	4.20
Net Throughput(gal/yr):	4,200.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good
Roof Color/Shade:	White/White
Roof Condition:	Good

Roof Characteristics

Type:	Cone
Height (ft)	0.00
Slope (ft/ft) (Cone Roof)	0.00

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meterological Data used in Emissions Calculations: Albuquerque, New Mexico (Avg Atmospheric Pressure = 12.15 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

Laguna Mist Eliminator 1,100 gallon - Vertical Fixed Roof Tank
Albuquerque, New Mexico

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Gasoline (RVP 6)	Jan	47.89	42.17	53.62	56.17	2.2679	1.9969	2.5659	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Feb	50.81	44.36	57.26	56.17	2.4159	2.0987	2.7712	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Mar	54.35	47.06	61.64	56.17	2.6057	2.2268	3.0358	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Apr	58.66	50.46	66.85	56.17	2.8537	2.3978	3.3729	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	May	62.97	54.46	71.47	56.17	3.1201	2.6120	3.7058	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Jun	67.53	58.77	76.29	56.17	3.4243	2.8603	4.0755	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Jul	69.19	61.28	77.09	56.17	3.5405	3.0137	4.1397	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Aug	67.74	60.39	75.10	56.17	3.4391	2.9586	3.9811	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Sep	64.12	57.10	71.14	56.17	3.1948	2.7618	3.6813	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Oct	58.55	51.73	65.37	56.17	2.8472	2.4640	3.2778	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Nov	52.41	46.40	58.41	56.17	2.5002	2.1950	2.8392	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Dec	48.22	42.74	53.70	56.17	2.2841	2.0246	2.5702	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3

TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)

Laguna Mist Eliminator 1,100 gallon - Vertical Fixed Roof Tank
Albuquerque, New Mexico

Month:	January	February	March	April	May	June	July	August	September	October	November	December
Standing Losses (lb):	2.7195	3.0224	4.2039	5.1945	6.3061	7.1764	6.9952	6.2187	5.1527	4.4166	3.1419	2.6185
Vapor Space Volume (cu ft):	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699
Vapor Density (lb/cu ft):	0.0287	0.0304	0.0326	0.0354	0.0384	0.0418	0.0430	0.0419	0.0392	0.0353	0.0314	0.0289
Vapor Space Expansion Factor:	0.0964	0.1135	0.1352	0.1622	0.1796	0.1989	0.1838	0.1663	0.1496	0.1337	0.1075	0.0924
Vented Vapor Saturation Factor:	0.8062	0.7961	0.7836	0.7678	0.7515	0.7337	0.7271	0.7328	0.7470	0.7682	0.7905	0.8051
Tank Vapor Space Volume:												
Vapor Space Volume (cu ft):	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699	39.2699
Tank Diameter (ft):	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000
Vapor Space Outage (ft):	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000
Tank Shell Height (ft):	7.0000	7.0000	7.0000	7.0000	7.0000	7.0000	7.0000	7.0000	7.0000	7.0000	7.0000	7.0000
Average Liquid Height (ft):	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000
Roof Outage (ft):	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Roof Outage (Cone Roof)												
Roof Outage (ft):	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Roof Height (ft):	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Roof Slope (ft/ft):	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Shell Radius (ft):	2.5000	2.5000	2.5000	2.5000	2.5000	2.5000	2.5000	2.5000	2.5000	2.5000	2.5000	2.5000
Vapor Density												
Vapor Density (lb/cu ft):	0.0287	0.0304	0.0326	0.0354	0.0384	0.0418	0.0430	0.0419	0.0392	0.0353	0.0314	0.0289
Vapor Molecular Weight (lb/lb-mole):	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.2679	2.4159	2.6057	2.8537	3.1201	3.4243	3.5405	3.4391	3.1948	2.8472	2.5002	2.2841
Daily Avg. Liquid Surface Temp. (deg. R):	507.5636	510.4798	514.0158	518.3292	522.6357	527.2019	528.8587	527.4145	523.7886	518.2268	512.0765	507.8692
Daily Average Ambient Temp. (deg. F):	34.2500	39.9500	46.8000	55.2000	64.1500	74.1500	78.4500	75.8000	68.5500	57.0000	44.2500	35.3000
Ideal Gas Constant R (psia cuft / (lb-mol-deg R)):	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731
Liquid Bulk Temperature (deg. R):	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442
Tank Paint Solar Absorptance (Shell):	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700
Tank Paint Solar Absorptance (Roof):	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700
Daily Total Solar Insulation Factor (Btu/sq.ft.day):	1,017.1676	1,321.1123	1,709.7680	2,169.4923	2,443.9306	2,567.6661	2,392.5331	2,186.3558	1,860.7886	1,499.1008	1,101.2442	915.6412
Vapor Space Expansion Factor												
Vapor Space Expansion Factor:	0.0964	0.1135	0.1352	0.1622	0.1796	0.1989	0.1838	0.1663	0.1496	0.1337	0.1075	0.0924
Daily Vapor Temperature Range (deg. R):	22.9137	25.8605	29.1625	32.7908	34.0251	35.8461	31.6205	29.4103	28.0614	27.2957	24.0339	21.9265
Daily Vapor Pressure Range (psia):	0.5678	0.6725	0.8099	0.9501	1.0638	1.2152	1.1259	1.0226	0.9196	0.8136	0.6442	0.5457
Breather Vent Press. Setting Range(psia):	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.2679	2.4159	2.6057	2.8537	3.1201	3.4243	3.5405	3.4391	3.1948	2.8472	2.5002	2.2841
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	1.9969	2.0987	2.2268	2.3978	2.6120	2.8603	3.0137	2.9586	2.7618	2.4640	2.1950	2.0246
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	2.5659	2.7712	3.0358	3.3779	3.7058	4.0755	4.1397	3.9811	3.6813	3.2778	2.8392	2.5702
Daily Avg. Liquid Surface Temp. (deg R):	507.5636	510.4798	514.0158	518.3292	522.6357	527.2019	528.8587	527.4145	523.7886	518.2268	512.0765	507.8692
Daily Min. Liquid Surface Temp. (deg R):	501.8352	504.6297	508.7251	513.1315	514.1295	518.4404	520.8535	520.0619	516.7682	511.2969	506.0690	502.4076
Daily Max. Liquid Surface Temp. (deg R):	513.2920	516.9299	521.3064	526.5269	531.1420	535.9634	536.7635	534.7670	530.8089	525.0448	518.0850	513.3709
Daily Ambient Temp. Range (deg. R):	25.1000	27.1000	29.2000	31.2000	31.1000	31.7000	28.1000	26.4000	26.7000	28.0000	25.1000	24.4000
Vented Vapor Saturation Factor												
Vented Vapor Saturation Factor:	0.8062	0.7961	0.7836	0.7678	0.7515	0.7337	0.7271	0.7328	0.7470	0.7682	0.7905	0.8051
Vapor Pressure at Daily Average Liquid: Surface Temperature (psia):	2.2679	2.4159	2.6057	2.8537	3.1201	3.4243	3.5405	3.4391	3.1948	2.8472	2.5002	2.2841

Vapor Space Outage (ft):	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000	2.0000
Working Losses (lb):	1.3041	1.3891	1.4983	1.6409	1.7841	1.9690	2.0358	1.9775	1.8370	1.6372	1.4376	1.3133
Vapor Molecular Weight (lb/lb-mole):	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.2679	2.4159	2.6057	2.8537	3.1201	3.4243	3.5405	3.4391	3.1948	2.8472	2.5002	2.2841
Net Throughput (gal/mo.):	350.0000	350.0000	350.0000	350.0000	350.0000	350.0000	350.0000	350.0000	350.0000	350.0000	350.0000	350.0000
Annual Turnovers:	4.2000	4.2000	4.2000	4.2000	4.2000	4.2000	4.2000	4.2000	4.2000	4.2000	4.2000	4.2000
Turnover Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Maximum Liquid Volume (gal):	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000
Maximum Liquid Height (ft):	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000
Tank Diameter (ft):	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000	5.0000
Working Loss Product Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total Losses (lb):	4.0236	4.4116	5.7022	6.8354	8.1081	9.1474	9.0310	8.1961	6.9997	6.0537	4.5795	3.9319

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: January, February, March, April, May, June, July, August, September, October, November, December

Laguna Mist Eliminator 1,100 gallon - Vertical Fixed Roof Tank
Albuquerque, New Mexico

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Gasoline (RVP 6)	19.83	57.18	77.01

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Indentification and Physical Characteristics

Identification

User Identification:	Laguna T-2
City:	Albuquerque
State:	New Mexico
Company:	Transwestern Pipeline Company, LLC
Type of Tank:	Vertical Fixed Roof Tank
Description:	Laguna - T-2 Condensate Tank 21,000 gallon vessel

Tank Dimensions

Shell Height (ft):	25.00
Diameter (ft):	12.00
Liquid Height (ft) :	13.00
Avg. Liquid Height (ft):	12.50
Volume (gallons):	12,000.00
Turnovers:	1.00
Net Throughput(gal/yr):	12,000.00
Is Tank Heated (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good
Roof Color/Shade:	White/White
Roof Condition:	Good

Roof Characteristics

Type:	Cone
Height (ft)	0.00
Slope (ft/ft) (Cone Roof)	0.00

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meterological Data used in Emissions Calculations: Albuquerque, New Mexico (Avg Atmospheric Pressure = 12.15 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

Laguna T-2 - Vertical Fixed Roof Tank
Albuquerque, New Mexico

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Gasoline (RVP 6)	Jan	47.89	42.17	53.62	56.17	2.2679	1.9989	2.5659	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Feb	50.81	44.36	57.26	56.17	2.4159	2.0987	2.7712	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Mar	54.35	47.06	61.64	56.17	2.6057	2.2268	3.0356	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Apr	58.66	50.46	66.86	56.17	2.8537	2.3978	3.3779	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	May	62.97	54.46	71.47	56.17	3.1201	2.6120	3.7058	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Jun	67.53	58.77	76.29	56.17	3.4243	2.8603	4.0755	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Jul	69.19	61.28	77.09	56.17	3.5405	3.0137	4.1397	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Aug	67.74	60.39	75.10	56.17	3.4391	2.9586	3.9811	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Sep	64.12	57.10	71.14	56.17	3.1948	2.7618	3.6813	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Oct	58.55	51.73	65.37	56.17	2.8472	2.4640	3.2778	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Nov	52.41	46.40	58.41	56.17	2.5002	2.1950	2.8392	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3
Gasoline (RVP 6)	Dec	48.22	42.74	53.70	56.17	2.2841	2.0246	2.5702	69.0000			92.00	Option 4: RVP=6, ASTM Slope=3

TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)

Laguna T-2 - Vertical Fixed Roof Tank
Albuquerque, New Mexico

Month:	January	February	March	April	May	June	July	August	September	October	November	December
Standing Losses (lb):	48.5265	52.5557	70.8433	84.2629	98.4982	107.7595	103.5208	93.1809	79.8315	71.7125	53.8546	46.5901
Vapor Space Volume (cu ft):	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167
Vapor Density (lb/cu ft):	0.0287	0.0304	0.0326	0.0354	0.0384	0.0418	0.0430	0.0419	0.0392	0.0353	0.0314	0.0289
Vapor Space Expansion Factor:	0.0964	0.1135	0.1352	0.1622	0.1796	0.1989	0.1836	0.1663	0.1496	0.1337	0.1075	0.0924
Vented Vapor Saturation Factor:	0.3996	0.3845	0.3668	0.3460	0.3260	0.3059	0.2989	0.3050	0.3209	0.3465	0.3765	0.3979
Tank Vapor Space Volume:												
Vapor Space Volume (cu ft):	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167	1,413.7167
Tank Diameter (ft):	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000
Vapor Space Outage (ft):	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000
Tank Shell Height (ft):	25.0000	25.0000	25.0000	25.0000	25.0000	25.0000	25.0000	25.0000	25.0000	25.0000	25.0000	25.0000
Average Liquid Height (ft):	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000
Roof Outage (ft):	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Roof Outage (Cone Roof)												
Roof Outage (ft):	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Roof Height (ft):	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Roof Slope (ft/ft):	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Shell Radius (ft):	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000
Vapor Density												
Vapor Density (lb/cu ft):	0.0287	0.0304	0.0326	0.0354	0.0384	0.0418	0.0430	0.0419	0.0392	0.0353	0.0314	0.0289
Vapor Molecular Weight (lb/lb-mole):	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.2679	2.4159	2.6057	2.8537	3.1201	3.4243	3.5405	3.4391	3.1948	2.8472	2.5002	2.2841
Daily Avg. Liquid Surface Temp. (deg. R):	507.5636	510.4798	514.0158	518.3292	522.6357	527.2019	528.8587	527.4145	523.7886	518.2208	512.0765	507.8892
Daily Average Ambient Temp. (deg. F):	34.2500	39.9500	46.8000	56.2000	64.1500	74.1500	78.4500	75.8000	68.5500	57.0000	44.2500	35.3000
Ideal Gas Constant R (psia cuft / (lb-mol-deg R)):	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731
Liquid Bulk Temperature (deg. R):	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442	515.8442
Tank Paint Solar Absorptance (Shell):	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700
Tank Paint Solar Absorptance (Roof):	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700
Daily Total Solar Insulation Factor (Btu/sqft day):	1,017.1676	1,321.1123	1,709.7680	2,169.4923	2,443.9308	2,567.6661	2,392.5331	2,185.3558	1,860.7886	1,499.1008	1,101.2442	915.6412
Vapor Space Expansion Factor												
Vapor Space Expansion Factor:	0.0964	0.1135	0.1352	0.1622	0.1796	0.1989	0.1836	0.1663	0.1496	0.1337	0.1075	0.0924
Daily Vapor Temperature Range (deg. R):	22.9137	25.6005	29.1625	32.7908	34.0251	35.0461	31.6205	29.4103	28.0814	27.2957	24.0339	21.9265
Daily Vapor Pressure Range (psia):	0.5670	0.6725	0.8090	0.9801	1.0938	1.2152	1.1259	1.0226	0.9195	0.8138	0.6442	0.5457
Breather Vent Press. Setting Range(psia):	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.2679	2.4159	2.6057	2.8537	3.1201	3.4243	3.5405	3.4391	3.1948	2.8472	2.5002	2.2841
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	1.9989	2.0987	2.2268	2.3978	2.6120	2.8603	3.0137	2.9586	2.7618	2.4640	2.1950	2.0246
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	2.5659	2.7712	3.0356	3.3779	3.7058	4.0755	4.1397	3.9811	3.6813	3.2778	2.8392	2.5702
Daily Avg. Liquid Surface Temp. (deg R):	507.5636	510.4798	514.0158	518.3292	522.6357	527.2019	528.8587	527.4145	523.7886	518.2208	512.0765	507.8892
Daily Min. Liquid Surface Temp. (deg R):	501.8352	504.0297	506.7251	510.1315	514.1295	518.4404	520.9536	520.0619	516.7682	511.3969	506.0680	502.4076
Daily Max. Liquid Surface Temp. (deg R):	513.2920	516.9299	521.3064	526.5269	531.1420	535.9634	536.7538	534.7670	530.8089	525.0448	518.0850	513.3709
Daily Ambient Temp. Range (deg. R):	25.1900	27.1900	29.2000	31.2000	31.1000	31.7000	28.1000	26.4000	26.7000	28.0000	26.1000	24.4000
Vented Vapor Saturation Factor												
Vented Vapor Saturation Factor:	0.3996	0.3845	0.3668	0.3460	0.3260	0.3059	0.2989	0.3050	0.3209	0.3465	0.3765	0.3979
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.2679	2.4159	2.6057	2.8537	3.1201	3.4243	3.5405	3.4391	3.1948	2.8472	2.5002	2.2841

Vapor Space Outage (ft):	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000	12.5000
Working Losses (lb):	3.7259	3.9689	4.2809	4.6882	5.1259	5.5257	5.8155	5.6499	5.2485	4.6776	4.1074	3.7524
Vapor Molecular Weight (lb/lb-mole):	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000	69.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	2.2579	2.4159	2.6057	2.8537	3.1201	3.4243	3.5405	3.4391	3.1948	2.8472	2.5002	2.2841
Net Throughput (gal/mo.):	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000	1,000.0000
Annual Turnovers:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Turnover Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Maximum Liquid Volume (gal):	12,000.0000	12,000.0000	12,000.0000	12,000.0000	12,000.0000	12,000.0000	12,000.0000	12,000.0000	12,000.0000	12,000.0000	12,000.0000	12,000.0000
Maximum Liquid Height (ft):	13.0000	13.0000	13.0000	13.0000	13.0000	13.0000	13.0000	13.0000	13.0000	13.0000	13.0000	13.0000
Tank Diameter (ft):	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000	12.0000
Working Loss Product Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total Losses (lb):	52.2524	56.5246	75.1242	88.9511	103.6241	113.3852	109.3374	98.8308	85.0801	76.3901	57.9729	50.3425

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: January, February, March, April, May, June, July, August, September, October, November, December

Laguna T-2 - Vertical Fixed Roof Tank
Albuquerque, New Mexico

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Gasoline (RVP 6)	56.67	911.15	967.81

TANKS 4.0.9d
Emissions Report - Detail Format
Total Emissions Summaries - All Tanks in Report

Emissions Report for: January, February, March, April, May, June, July, August, September, October, November, December

Tank Identification				Losses (lbs)
Laguna Mist Eliminator 1,100 gallon	Transwestern Pipeline Company, LLC	Vertical Fixed Roof Tank	Albuquerque, New Mexico	77.01
Laguna T-2	Transwestern Pipeline Company, LLC	Vertical Fixed Roof Tank	Albuquerque, New Mexico	967.81
Total Emissions for all Tanks:				1,044.83

TRUCK LOADING POTENTIAL TO EMIT
POTENTIAL TO EMIT
COMPRESSOR STATION NO. 6 LAGUNA
TRANSWESTERN PIPELINE COMPANY, LLC

Sample Calculations:

Loading Loss = 12.46 * (Saturation Factor) * (True Vapor Pressure, psia) * (MW, lb/lb-mol) / (Temp., R) * (1 - Control Eff., wt%)

Loading Loss = 12.46 * (0.60) * (2.85 psia) * (69.0 lb/lb-mol) / (58.54 +460) R * (1 - 0.00) = 2.8316 lb/Mgal

Hourly PTE = (Hourly Throughput, Mgal/hr) * (Loading Loss, lb/Mgal) * (Condensate Fraction)

Hourly PTE = (9.00 Mgal/hr) * (2.8316 lb/Mgal) * (1.00) = 25.48 lb/hr

Annual PTE = (Annual Throughput, Mgal/yr) * (Loading Loss, lb/Mgal) / (2,000 lb/T) * (Condensate Fraction)

Annual PTE = (21.0 Mgal/yr) * (2.8316 lb/Mgal) / (2,000 lb/T) * (1.00) = 0.03 T/yr

Facility ID	Facility Name	Emission Point ID	Emission Point Name	Saturation Factor	Vapor Pressure (psia)	Molecular Weight (lb/mole)	Temp. (F)	Control Efficiency	Hourly Throughput (Mgals/hr)	Annual Throughput (Mgals/yr)	Condensate Fraction	Loading Loss (lb/Mgal)	VOC Hourly PTE (lb/hr)	VOC Annual PTE (T/yr)
TRUCK	Condensate Loading	TRUCK	Condensate Loading	0.60	2.8464	69	58.54	0.0%	9.0	21.0	1.00	2.8316	25.48	0.03
TRUCK	Separated Oil	TRUCK	Separated Oil Loading	0.60	2.8464	69	58.54	0.0%	9.0	4.2	1.00	2.8316	25.48	0.01

1. Calculation method and factors per AP-42, Section 5.2, dated June 2008.
2. True Vapor Pressure, Molecular Weight, and Temperature per EPA Tanks 4.0d Program and found on the following pages.

Pitre, Randy Document #3

om: Huston, Karl <Karl.Huston@energytransfer.com>
ent: Wednesday, August 20, 2014 5:35 PM
To: Pitre, Randy
Cc: Campbell, Lawrence (Larry)
Subject: RE: Transwestern Pipeline Company Compressor No. 6 (Laguna)
Attachments: Revised Form 5900-79 with Facility Emissions Summary 08-20-2014.pdf; Revised Form 5900-84 for Unit ID 601 - 08-20-2014.pdf; Revised Form 5900-84 for Unit ID 602 - 08-20-2014.pdf; Revised Form 5900-84 for Unit ID 603 - 08-20-2014.pdf; Revised Form 5900-84 for Unit ID 621 - 08-20-2014.pdf; Revised Form 5900-85 for Facility PTE - 08-20-2014.pdf; Revised PTE Calculations Summary - 08-20-2014.pdf; Revised HAPs PTE Calculations Summary - 08-20-2014.pdf; Revised Engines PTE Calculations Summary - 08-20-2014.pdf; Revised Heater PTE Calculations Summary - 08-20-2014.pdf

Randy,

I have reviewed the emission tables for the Transwestern Pipeline Company October 31, 2012, application for Compressor Station No. 6 (Laguna) and have revised all of the tables that include PM emissions to include PM2.5, as well. The revised tables are attached.

Please let me know if you need anything else.

Sincerely,

arl
Environmental Specialist
Transwestern Pipeline Company
San Antonio
210-572-0504

From: Campbell, Lawrence (Larry)
Sent: Friday, August 08, 2014 2:53 PM
To: Huston, Karl
Subject: FW: Transwestern Pipeline Company Compressor No. 6 (Laguna)

Karl, would complete the below request and forward to Randy with the EPA? You should have a copy of the application.

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Friday, August 08, 2014 1:50 PM
To: Campbell, Lawrence (Larry)
Subject: Transwestern Pipeline Company Compressor No. 6 (Laguna)

Larry,

The October 31, 2012 application for the Transwestern Pipeline Company Compressor Station No. 6 (Laguna) emission tables did not include PM2.5. Please update the emission tables to include PM2.5.

andy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

PERMIT RENEWAL

SUMMARY OF HAP POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

Stack ID	Description	HAP Emissions Hourly (lb/hr)	HAP Emissions Annual (T/yr)
Normal Operations			
601	Clark TCV-12	2.65	11.60
602	Clark TCV-12	2.65	11.60
603	Clark TCV-12	2.65	11.60
621	Waukesha F3520GU	0.10	0.01
Heater-1	Waste Water Heater	0.0001	0.0004
FUG	Site Fugitives	0.0002	0.001
MIST	Mist Eliminator	0.0003	0.02
T-2	Condensate Tank	0.010	0.06
TRUCK	Liquid Loading	12.74	0.01
Maintenance Operations			
601-BDSV	Clark TCV-12 Blowdown & Starters	0.01	0.0003
602-BDSV	Clark TCV-12 Blowdown & Starters	0.01	0.0003
603-BDSV	Clark TCV-12 Blowdown & Starters	0.01	0.0003
621-BDSV	Waukesha F3520GU Starters	0.01	0.0000
	Total Emissions:	**20.84**	**34.90**

Note: Maintenance Operations represent Startup, Shutdown, and Maintenance (SSM) activities.

PERMIT RENEWAL

SUMMARY OF POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

		CO Emissions		NO_X Emissions		PM10 Emissions*		PM2.5 Emissions*		SO_2 Emissions		VOC Emissions		CH_2O Emissions		Benzene Emissions		CO_2e	
Stack ID	Description	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)	Hourly (lb/hr)	Annual (T/yr)
Normal Operations																			
601	Clark TCV-12	34.52	151.20	113.79	498.40	1.67	7.31	1.67	7.31	0.02	0.09	4.16	18.22	1.91	8.37	0.07	0.31		17,757.12
602	Clark TCV-12	34.52	151.20	113.79	498.40	1.67	7.31	1.67	7.31	0.02	0.09	4.16	18.22	1.91	8.37	0.07	0.31		17,757.12
603	Clark TCV-12	34.52	151.20	113.79	498.40	1.67	7.31	1.67	7.31	0.02	0.09	4.16	18.22	1.91	8.37	0.07	0.31		17,757.12
621	Waukesha F3520GU	15.62	0.78	9.28	0.46	0.08	0.004	0.08	0.004	0.002	0.0001	0.12	0.01	0.09	0.01	0.01	0.001		24.57
HEATER-1	Waste Water Heater	0.08	0.35	0.10	0.44	0.01	0.04	0.01	0.04	0.001	0.004	0.01	0.04	0.0001	0.0004	0.000002	0.00001		512.47
FUG	Site Fugitives											0.36	1.34			0.0002	0.001		513.90
MIST	Mist Eliminator											0.29	5.54			0.0003	0.02		2,200.00
T-2	Condensate Tank											6.00	28.17			0.01	0.06		11,080.00
TRUCK	Liquid Loading											50.96	0.04						
Maintenance Operations**																			
601-BDSV	Clark TCV-12 Blowdowns & Starters											8.33	0.30			0.01	0.0003		87.58
602-BDSV	Clark TCV-12 Blowdowns & Starters											8.33	0.30			0.01	0.0003		87.58
603-BDSV	Clark TCV-12 Blowdowns & Starters											8.33	0.30			0.01	0.0003		87.58
621-BDSV	Waukesha F3520GU Starters											6.08	0.02			0.01	0.0000		9.68
	Total Emissions:	**119.26**	**454.73**	**350.75**	**1496.10**	**5.10**	**21.97**	**5.10**	**21.97**	**0.06**	**0.27**	**101.29**	**90.72**	**5.82**	**25.12**	**0.27**	**1.01**		**67,874.72**

Notes:

*** PM10 and PM2.5 Emissions are taken to be equal and representative of total PM emissions.**

**** Maintenance Operations represent Startup, Shutdown, and Maintenance (SSM) activities.**

GREENHOUSE GAS POTENTIAL TO EMIT FOR COMBUSTION SOURCES

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

Combustion-Related Green House Gas Emissions

Combustion Source ID	HP	Btu/hp-hr	MMBtu/hr	Annual Operating Hours	Fuel Usage MMBtu/Term	CO_2e[a] metric T/yr	CO_2e[a] short T/yr	GHG Mass[a] short T/yr
601	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
602	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
603	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
621	470	7,750	4.20	100	420.00	22.29	24.57	24.55
Heater-1	--	--	1.00	8,760	8,760.00	464.91	512.47	511.98
SITE TOTAL			**109.15**	—	**919,782.00**	**48,814.68**	**53,808.40**	**53,756.80**

[a]Sample calculations:

Greenhouse Gas (GHG) Emission Factors from Tables C-1 and C-2 of 40 CFR 98, Subpart C, are as follows:

Carbon Dioxide Emission Factor (CO_2EF) = 53.02 kg/MMBtu
Methane Emission Factor (CH_4EF) = 0.001 kg/MMBtu
Nitrous Oxide Emission Factor (N_2OEF) = 0.0001 kg/MMBtu

An example calculation for carbon dioxide equivalent CO_2e in metric T/yr for ID 601 follows:
CO_2e (metric T/yr) = (0.001 metric T/kg)*(Fuel usage, MMBtu/yr))*[(CO_2EF + 21*CH_4EF + 310*N_2OEF), kg/MMBtu]
CO2e (metric T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (21*0.001 kg/MMBtu) + (310*0.0001 kg/MMBtu)] = 16,109.16 metric T/yr

An example calculation for CO_2e in short T/yr for ID 601 follows:
CO_2e (short T/yr) = (0.001 metric T/kg) * (Fuel usage, MMBtu/yr)) * [(CO_2EF + 21*CH_4EF + 310*N_2OEF), kg/MMBtu] * (2,204.6 lb/metric T) / (2,000 lb/short T)
CO2e (short T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (21*0.001 kg/MMBtu) + (310*0.0001 kg/MMBtu)] * (2,204.6 lb/metric T) / (2,000 lb/short T) = 17,757.12 short T/yr

An example calculation for GHG Mass in short T/yr for ID 601 follows:
GHG Mass (short T/yr) = (0.001 metric T/kg) * (Fuel usage, MMBtu/yr) * (CO_2EF+CH_4EF+N_2OEF) * (2,204.6 lb/metric T) / (2,000 lb/short T)
GHG Mass (short T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (0.001 kg/MMBtu) + (0.0001 kg/MMBtu)] * (2,204.6 lb/metric T) / (2,000 lb/short T) = 17,740.09 short T/yr

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 621

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)	
Nitrogen Oxides		9.3	0.5	
Carbon Monoxide		15.6	0.8	
NMHC		0.1	0.01	
Sulfur Dioxide		0.002	0.0001	
Particulate Matter (PM10)		0.1	0.004	
Particulate Matter (PM2.5)		0.1	0.004	
Formaldehyde		0.1	0.01	
Total HAP		0.1	0.01	
Greenhouse Gases (Mass)			24.55	

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 601

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)	
Nitrogen Oxides		113.8	498.4	
Carbon Monoxide		34.5	151.2	
NMHC		4.2	18.2	
Sulfur Dioxide		0.02	0.1	
Particulate Matter (PM10)		1.7	7.3	
Particulate Matter (PM2.5)		1.7	7.3	
Formaldehyde		1.9	8.4	
Total HAP		2.7	11.6	
Greenhouse Gases (Mass)			17,740	

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 603

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)	
Nitrogen Oxides		113.8	498.4	
Carbon Monoxide		34.5	151.2	
NMHC		4.2	18.2	
Sulfur Dioxide		0.02	0.1	
Particulate Matter (PM10)		1.7	7.3	
Particulate Matter (PM2.5)		1.7	7.3	
Formaldehyde		1.9	8.4	
Total HAP		2.7	11.6	
Greenhouse Gases (Mass)			17,740	

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 602

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)	
Nitrogen Oxides		113.8	498.4	
Carbon Monoxide		34.5	151.2	
NMHC		4.2	18.2	
Sulfur Dioxide		0.02	0.1	
Particulate Matter (PM10)		1.7	7.3	
Particulate Matter (PM2.5)		1.7	7.3	
Formaldehyde		1.9	8.4	
Total HAP		2.7	11.6	
Greenhouse Gases (Mass)			17,740	

GREENHOUSE GAS POTENTIAL TO EMIT FOR COMBUSTION SOURCES

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

Combustion-Related Green House Gas Emissions

Combustion Source ID	HP	Btu/hp-hr	MMBtu/hr	Annual Operating Hours	Fuel Usage MMBtu/Term	CO_2e[a] metric T/yr	CO_2e[a] short T/yr	GHG Mass[a] short T/yr
601	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
602	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
603	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
621	470	7,750	4.20	100	420.00	22.29	24.57	24.55
Heater-1	--	--	1.00	8,760	8,760.00	464.91	512.47	511.98
SITE TOTAL			**109.15**	**—**	**919,782.00**	**48,814.68**	**53,808.40**	**53,756.80**

[a]Sample calculations:

Greenhouse Gas (GHG) Emission Factors from Tables C-1 and C-2 of 40 CFR 98, Subpart C, are as follows:

Carbon Dioxide Emission Factor (CO_2EF) = 53.02 kg/MMBtu
Methane Emission Factor (CH_4EF) = 0.001 kg/MMBtu
Nitrous Oxide Emission Factor (N_2OEF) = 0.0001 kg/MMBtu

An example calculation for carbon dioxide equivalent CO_2e in metric T/yr for ID 601 follows:
CO_2e (metric T/yr) = (0.001 metric T/kg)*(Fuel usage, MMBtu/yr))*[(CO_2EF + 21*CH_4EF + 310*N_2OEF), kg/MMBtu]
CO2e (metric T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (21*0.001 kg/MMBtu) + (310*0.0001 kg/MMBtu)] = 16,109.16 metric T/yr

An example calculation for CO_2e in short T/yr for ID 601 follows:
CO_2e (short T/yr) = (0.001 metric T/kg) * (Fuel usage, MMBtu/yr)) * [(CO_2EF + 21*CH_4EF + 310*N_2OEF), kg/MMBtu] * (2,204.6 lb/metric T) / (2,000 lb/short T)
CO2e (short T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (21*0.001 kg/MMBtu) + (310*0.0001 kg/MMBtu)] * (2,204.6 lb/metric T) / (2,000 lb/short T) = 17,757.12 short T/yr

An example calculation for GHG Mass in short T/yr for ID 601 follows:
GHG Mass (short T/yr) = (0.001 metric T/kg) * (Fuel usage, MMBtu/yr) * (CO_2EF+CH_4EF+N_2OEF) * (2,204.6 lb/metric T) / (2,000 lb/short T)
GHG Mass (short T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (0.001 kg/MMBtu) + (0.0001 kg/MMBtu)] * (2,204.6 lb/metric T) / (2,000 lb/short T) = 17,740.09 short T/yr

GREENHOUSE GAS POTENTIAL TO EMIT FOR COMBUSTION SOURCES

POTENTIAL TO EMIT

COMPRESSOR STATION NO. 6 LAGUNA

TRANSWESTERN PIPELINE COMPANY, LLC

Combustion-Related Green House Gas Emissions

Combustion Source ID	HP	Btu/hp-hr	MMBtu/hr	Annual Operating Hours	Fuel Usage MMBtu/Term	CO_2e[a] metric T/yr	CO_2e[a] short T/yr	GHG Mass[a] short T/yr
601	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
602	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
603	4,500	7,900	34.65	8,760	303,534.00	16,109.16	17,757.12	17,740.09
621	470	7,750	4.20	100	420.00	22.29	24.57	24.55
Heater-1	--	--	1.00	8,760	8,760.00	464.91	512.47	511.98
SITE TOTAL			**109.15**	**---**	**919,782.00**	**48,814.68**	**53,808.40**	**53,756.80**

[a]Sample calculations:

Greenhouse Gas (GHG) Emission Factors from Tables C-1 and C-2 of 40 CFR 98, Subpart C, are as follows:

Carbon Dioxide Emission Factor (CO_2EF) = 53.02 kg/MMBtu
Methane Emission Factor (CH_4EF) = 0.001 kg/MMBtu
Nitrous Oxide Emission Factor (N_2OEF) = 0.0001 kg/MMBtu

An example calculation for carbon dioxide equivalent CO_2e in metric T/yr for ID 601 follows:
CO_2e (metric T/yr) = (0.001 metric T/kg)*(Fuel usage, MMBtu/yr))*[(CO_2EF + 21*CH_4EF + 310*N_2OEF), kg/MMBtu]
CO2e (metric T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (21*0.001 kg/MMBtu) + (310*0.0001 kg/MMBtu)] = 16,109.16 metric T/yr

An example calculation for CO_2e in short T/yr for ID 601 follows:
CO_2e (short T/yr) = (0.001 metric T/kg) * (Fuel usage, MMBtu/yr)) * [(CO_2EF + 21*CH_4EF + 310*N_2OEF), kg/MMBtu] * (2,204.6 lb/metric T) / (2,000 lb/short T)
CO2e (short T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (21*0.001 kg/MMBtu) + (310*0.0001 kg/MMBtu)] * (2,204.6 lb/metric T) / (2,000 lb/short T) = 17,757.12 short T/yr

An example calculation for GHG Mass in short T/yr for ID 601 follows:
GHG Mass (short T/yr) = (0.001 metric T/kg) * (Fuel usage, MMBtu/yr) * (CO_2EF+CH_4EF+N_2OEF) * (2,204.6 lb/metric T) / (2,000 lb/short T)
GHG Mass (short T/yr) = (0.001 metric T/kg) * (303,534 MMBtu/yr) * [(53.02 kg/MMBtu) + (0.001 kg/MMBtu) + (0.0001 kg/MMBtu)] * (2,204.6 lb/metric T) / (2,000 lb/short T) = 17,740.09 short T/yr

Pitre, Randy Document #4

From: Huston, Karl <Karl.Huston@energytransfer.com>
Sent: Thursday, October 02, 2014 2:14 PM
To: Pitre, Randy
Cc: Campbell, Lawrence (Larry)
Subject: RE: Transwestern Pipeline Company Compressor No. 6 (Laguna)
Attachments: Revised HAPs PTE Calculations Summary - 10-02-14.pdf

Randy,

The emissions table was intended to be submitted with no HAP emissions for the Truck Loading activity, due to the low level (0.04 tons per year) of VOC emissions for this activity. Emissions of HAPs were considered to be negligible.

However, if we can include an estimated Potential to Emit for HAPs at this time for this activity, the attached table shows the emissions, which assumes that the liquid loaded contains a maximum weight content of HAPs of 25 percent.

Thank you for bringing this question to our attention and for your consideration.

Karl

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Monday, September 29, 2014 1:47 PM
To: Huston, Karl
Cc: Campbell, Lawrence (Larry); Robinson, Jeffrey; Martinez, Maria
Subject: RE: Transwestern Pipeline Company Compressor No. 6 (Laguna)

Karl,

Please note that the emissions chart did not show any HAP emissions for the Truck Loading. Please verify if this is correct, or if there should be HAP emissions for Truck Loading.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

From: Huston, Karl [mailto:Karl.Huston@energytransfer.com]
Sent: Thursday, August 21, 2014 1:55 PM
To: Pitre, Randy
Cc: Campbell, Lawrence (Larry); Robinson, Jeffrey; Martinez, Maria
Subject: RE: Transwestern Pipeline Company Compressor No. 6 (Laguna)

Randy,

Thank you for reviewing the tables that I sent to you. I have revised the emissions calculation and summary tables to show the PM10 and PM2.5 emissions in separate columns or rows, depending on the table, rather than together in one column or row. Please let me know if this change is not what you were suggesting. Thank you.

Karl
210-572-0504

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Thursday, August 21, 2014 9:50 AM
To: Huston, Karl
Cc: Campbell, Lawrence (Larry); Robinson, Jeffrey; Martinez, Maria
Subject: RE: Transwestern Pipeline Company Compressor No. 6 (Laguna)

Karl,

Thank you for this updated information. Although, in AP-42 Natural Gas Fired Reciprocating Engines we understand the Footnote (i) on Table 3.2-1 "Considered ≤ 1 μm in aerodynamic diameter. Therefore, for filterable PM emissions, PM10(filterable) = PM2.5(filterable)," means that there are equal amounts of PM10 and PM2.5 included in the emissions. Therefore, the summary emissions Table for the Transwestern Pipeline Company Compressor Station No. 6 (Laguna) should indicate separate total emissions for PM10 and PM2.5.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

From: Huston, Karl [mailto:Karl.Huston@energytransfer.com]
Sent: Wednesday, August 20, 2014 5:35 PM
To: Pitre, Randy
Cc: Campbell, Lawrence (Larry)
Subject: RE: Transwestern Pipeline Company Compressor No. 6 (Laguna)

Randy,

I have reviewed the emission tables for the Transwestern Pipeline Company October 31, 2012, application for Compressor Station No. 6 (Laguna) and have revised all of the tables that include PM emissions to include PM2.5, as well. The revised tables are attached.

Please let me know if you need anything else.

Sincerely,

Karl
Environmental Specialist
Transwestern Pipeline Company
San Antonio
210-572-0504

From: Campbell, Lawrence (Larry)
Sent: Friday, August 08, 2014 2:53 PM
To: Huston, Karl
Subject: FW: Transwestern Pipeline Company Compressor No. 6 (Laguna)

Karl, would complete the below request and forward to Randy with the EPA? You should have a copy of the application.

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Friday, August 08, 2014 1:50 PM
To: Campbell, Lawrence (Larry)
Subject: Transwestern Pipeline Company Compressor No. 6 (Laguna)

Larry,

The October 31, 2012 application for the Transwestern Pipeline Company Compressor Station No. 6 (Laguna) emission tables did not include PM2.5. Please update the emission tables to include PM2.5.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299

Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.
Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.
Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.

Pitre, Randy Document # 5

From: Campbell, Lawrence (Larry) <Larry.Campbell@energytransfer.com>
Sent: Monday, September 28, 2015 8:56 AM
To: Pitre, Randy
Subject: RE: Compressor Station No. 6 - Laguna

Randy, unit 621 is a reciprocating engine that is used to power an electric generator. It is an emergency generator and only operates under emergency situations and during readiness checks.....it is regulated under Quad Z as an emergency generator....

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Monday, September 28, 2015 6:58 AM
To: Campbell, Lawrence (Larry)
Cc: Huston, Karl; Robinson, Jeffrey; Bartley, Richard; Verhalen, Frances
Subject: Compressor Station No. 6 - Laguna

Larry,

The renewal application received for Compressor Station No. 6 – Laguna identifies Unit 621 as an electrical generator. Please advise if Unit 621 is an emergency generator as described in 40 CFR Part 63 Subpart ZZZZ or if Unit 621 is regulated within Subpart ZZZZ as another type unit. Therefore, please update the information on Unit 621 as represented within the previously submitted application, and forward any revised application forms.

Randy L. Pitre
Air Permits Section
U.S. EPA Region 6
Office: (214) 665-7299
Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.

Pitre, Randy Document #6

From: Campbell, Lawrence (Larry) <Larry.Campbell@energytransfer.com>
Sent: Tuesday, December 01, 2015 2:54 PM
To: Pitre, Randy
Cc: Huston, Karl
Subject: RE: Transwestern Pipeline Company Compressor Station No. 6 - Laguna

Randy, please change the following:

- The Director needs to be changed to Dave Roybal
- Change the Indian School address to 8501 Jefferson NE 87113 in Albuquerque
- Remove waste water heater and the associated emissions from the permit. This piece of equipment has been removed from service and will not be operated.

These are the only changes to the draft that need to be made.

From: Pitre, Randy [mailto:Pitre.Randy@epa.gov]
Sent: Monday, November 23, 2015 6:57 AM
To: Campbell, Lawrence (Larry)
Cc: Robinson, Jeffrey; Bartley, Richard; Stanton, Marya
Subject: Transwestern Pipeline Company Compressor Station No. 6 - Laguna

Larry,

Attached is a draft renewal Part 71 Permit for the Transwestern Pipeline Company Compressor Station No. 6 – Laguna. Please review this draft permit, and provide us with any comments by December 4, 2015. We plan to issue a public notice next month.

Randy L. Pitre
U.S. EPA Region 6
Office: (214) 665-7299
Private and confidential as detailed here. If you cannot access hyperlink, please e-mail sender.

Document #7

Source Determination for
Transwestern Pipeline Company Compressor Station No. 6 - Laguna

Statutory and Regulatory Background

Title V of the federal Clean Air Act (Act) requires every major source of air pollution to obtain an operating permit. *See* 42 USC § 7661a(a). EPA operates the Title V permitting program in "Indian country," as that term is defined at 40 CFR § 71.2, where EPA has not explicitly approved an operating permit program meeting the requirements of 40 CFR Part 70 for Indian country. *See* 40 CFR § 71.4(b). In such areas, the Title V permitting requirements applicable to major sources are governed by EPA regulations found at 40 CFR Part 71 ("Part 71").

A "major source" under Title V means any stationary source (or any group of stationary sources located within a contiguous area and under common control) that is either: (1) a "major source," as defined in section 112 of the Act; or (2) a "major stationary source," as defined in section 302(j) of the Act or part D of Title I of the Act. *See* 42 USC § 7661(2). Likewise, EPA's definition of a "major source" under Part 71 largely incorporates the statutory definition. Under 40 CFR § 71.2, "major source" means any stationary source[1] (or any group of stationary sources that are located on one or more contiguous or adjacent properties, and are under common control of the same person or persons under common control) belonging to a single major industrial grouping and that are described in paragraph (1), (2), or (3) of 40 CFR § 71.2 [the definition of major source].[2] For the purposes of defining "major source," a stationary source or group of stationary sources shall be considered part of a single industrial grouping if all of the pollutant-emitting activities at such source or group of sources on contiguous or adjacent properties belong to the same Major Group (i.e., all have the same two digit code) as described in the Standard Industrial Classification Manual, 1987. *See* 40 CFR 71.2.

Therefore, EPA considers three regulatory criteria when analyzing whether a group of pollutant- emitting activities constitute a single source for Title V permitting purposes: (1) whether the activities are under the common control of the same person (or persons under common control); (2) whether the activities belong to the same industrial grouping; and (3) whether the activities are located on one or more contiguous or adjacent properties. All three of the criteria must be met in order for the pollutant-emitting activities to be aggregated into the same source for Title V permitting purposes.

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[1] 40 CFR § 71.2 defines "stationary source" to mean "any building, structure, facility, or installation that emits or may emit any regulated air pollutant or any pollutant listed under section 112(b) of the Act."

[2] Of particular relevance to this permitting action, paragraph (2) of 40 CFR § 71.2 includes "[a] major stationary source of air pollutants, as defined in section 302 of the Act, that directly emits or has the potential to emit, 100 tpy or more of any air pollutant subject to regulation . . ." *See* 40 CFR § 71.2.

One aspect of the permitting process under Title V is a review of the record associated with the determination of which pollutant-emitting activities constitute the major source being permitted. Review of the permitting files associated with Transwestern Pipeline Company Compressor Station No. 6 - Laguna station does not indicate that a source determination was conducted in any previous NSR or Title V permitting action; EPA is now conducting a source determination within the context of the current Title V permitting action by examining the three criteria discussed above as they apply to the Compressor Station No. 6 - Laguna station. A brief discussion of each of the three criteria for identifying emissions activities that belong to the same stationary source is presented below, followed by an analysis of available information related to this permitting action as it applies to each of the three criteria. As explained below, we have determined that no other pollutant-emitting activities should be aggregated with the activities at the Compressor Station No. 6 - Laguna station for purposes of defining the stationary source to be permitted under Title V.

Criteria and Analysis for Source Determination

1. "Common Control"

a. *General Discussion*: The phrase "common control" is not defined in the Clean Air Act or in EPA regulations pertaining to the Title V permitting program. However, in the promulgation of the Part 71 definition of "major source," EPA was clear that the language and application of the Part 71 definition of stationary source was to be consistent with the PSD definition contained in 40 CFR § 52.21. See 61 Fed. Reg. 34202, 34210 (July 1, 1996).[3] In an early PSD rulemaking, EPA rejected a simplified test of control based on some specified voting share, instead stating that "[c]ontrol can be a difficult factual determination, involving the power of one business entity to affect the construction decisions of another business entity" and further explained that EPA would "be guided by the general definition of control used by the Securities and Exchange Commission, [in which] control 'means the possession, direct or indirect, of the power to direct or cause the direction of the management policies of a person (or organization or association) whether through the ownership of voting shares, contract, or otherwise.'" 45 Fed. Reg. 59874, 59878 (September 11, 1980) (quoting 17 CFR § 210.1-02(g)).[4] EPA has relied upon a common definition of control; Webster's dictionary defines control as "to exercise restraining or directing influence

[3] In the 1996 rulemaking, EPA has made clear that it will apply the three same criteria used in the title V source definition in a manner consistent with the PSD context.

[4] This definition is echoed in other Securities and Exchange Commission regulations, such as in 17 CFR § 230.405, which defines "control" as including the term "under common control with" and as meaning "the possession, direct or indirect, of the power to direct or cause the direction of management and policies of a person, whether through the ownership of voting securities, by contract, or otherwise." *See also* 17 CFR 240.12b-2.

over," "to have power over," "power of authority to guide or manage," and "the regulation of economic activity." While common ownership constitutes common control, common ownership is not the only evidence of common control. See Letter from William Spratlin, then Division Director of the Air, RCRA, and Toxics Division, EPA, Region 7, and dated September 18, 1995, to the State of Iowa ("Spratlin letter"). A determination of common control may be made on the basis of direct control, such as when facilities are owned by the same controlling entity, or on the basis of indirect control. See Letter from Kathleen Henry, EPA, Region 3, and dated January 15, 1999, to Pennsylvania Department of Environmental Protection. Hence, the nature of the interactions between two facilities that may otherwise be considered part of the same source should be examined. In considering interactions among facilities, what is relevant is who has the power of authority to guide, manage, or regulate the pollutant-emitting activities of those facilities, including the power to make or veto decisions to implement major emission control measures or influence production levels or compliance with environmental regulations. See Memorandum entitled "Major Source Determinations for Military Installations," from John Seitz, Director, Office of Air Quality Planning and Standards, EPA, and dated August 2, 1996, to EPA Regional Air Directors.[5] Although arising within the context of co-located facilities, the Spratlin letter referenced above provides additional guidance on the types of questions that may be asked by the permitting authority during its "common control" analysis of whether two facilities are under common control.

b. *Analysis for Transwestern Pipeline Company Compressor Station No. 6 - Laguna station*: The Transwestern Pipeline Company Compressor Station No. 6 – Laguna permit renewal application was prepared and submitted by Energy Transfer Company, which is the owner of Transwestern Pipeline Company. Through searching on the EPA database Envirofacts the locations of the Transwestern Pipeline Company compressor stations operating in New Mexico were present as holding air permits from the New Mexico Environmental Improvement Department. No Energy Transfer operated facilities were present in New Mexico. Energy Transfer facilities were found in Texas and Louisiana. The Mountainair Compressor Station No. 7 was found to be southeast of Compressor Station No. 6 – Laguna, and the Thoreau Compressor Station No. 5 was found to be west of the Compressor Station No. 6 – Laguna. The distance between the Compressor Station No.6 – Laguna and the Mountainair and Thoreau stations is more than fifty miles. Transwestern has numerous other stations

[5] *See also* memorandum from Edward E. Reich, Director, Stationary Source Compliance Division, to Diana Dutton, Director, Enforcement Division, EPA, Region 6, dated March 16, 1979. The phrase, "the power to make or veto decisions to implement major emission-control measures," comes from 44 Fed. Reg. 3279, January 16, 1979, the Agency's Interpretive Ruling on PSD regulations from June 19, 1978 (43 Fed. Reg. 26404).

located in other portions of New Mexico; however, the only station between the Mountainair and Thoreau stations is the Compressor Station No. 6 – Laguna.

2. Same Industrial Grouping – SIC Code

a. *General Discussion*: The Part 71 regulations state that "for purposes of defining major source,' a stationary source or group of stationary sources shall be considered part of a single industrial grouping if all of the pollutant emitting activities at such source or group of sources on contiguous or adjacent properties belong to the same Major Group (i.e., all have the same two-digit code) as described in the Standard Industrial Classification Manual, 1987." *See* 40 CFR 71.2.

b. *Analysis for Compressor Station No. 6 - Laguna station as related to the Thoreau Compressor Station No. 5 and Compressor Station No. 7 Mountainair stations*: The two-digit Standard Industrial Classification (SIC) code is 49, which is the same for all of the Transwestern Pipeline Company stations indicated as the Mountainair, Thoreau and Laguna stations. SIC Code 4922 includes "Establishments engaged in both the transmission and/or storage of natural gas for sale." All of the emission units at the Compressor Station No. 6 – Laguna are associated with the compression and transmission of natural gas through the Transwestern Pipeline Company pipeline.

3. Contiguous or Adjacent

a. *General Discussion*: The Part 71 regulations do not define the term "contiguous or adjacent properties" within the definition of "major source" (See 40 CFR § 71.2); however, as stated above, EPA intended the language and application of the Part 71 definition of "stationary source," including the concept of "contiguous or adjacent," to be consistent with the PSD definition of "stationary source" contained in 40 CFR § 52.21. *See* 61 Fed. Reg. 34202, 34210 (July 1, 1996). In the initial promulgation of the 3-part source definition in the PSD program, EPA explained that it could not "say precisely how far apart activities must be in order to be treated separately" and directed that such determinations be made on a case-by-case basis. *See* 45 Fed. Reg. 52676, 52695 (August 7, 1980). In that same rulemaking, EPA also stated that it did not intend "source" to encompass activities that would be miles apart along a long-line, and EPA would not treat all of the pumping stations along a pipeline as one source. *See* 45 Fed. Reg. 52676, 52695 (August 7, 1980). EPA has indicated that source determinations should be made on a "case-by-case" and "highly fact-specific" basis, where "no single determination can serve as an adequate justification for how to treat any other source determination for pollutant-emitting activities with different fact-specific circumstances" and where a fact-specific inquiry is necessary to

establish whether emission sources should be grouped together.[6] In its initial promulgation of the component terms of "source," under the PSD program, EPA indicated that the common sense notion of plant is the guiding principle in determining how "near" facilities need to be to be found "adjacent" and thus a single source.[7]

b. *Analysis for Laguna Compressor Station as related to the Thoreau and Mountainair compressor stations*: The Thoreau, Laguna and Mountainair compressor stations were found in the EPA Envirofacts database, and as indicated on the Envirofacts map these compressor stations are located more than fifty miles apart. The Thoreau station is west of the Compressor Station No. 6 – Laguna Compressor Station and the Mountainair station is southeast of the Laguna station.

Conclusion

After analysis of available information as explained above, we have determined that no pollutant-emitting activities should be aggregated with the activities at the Laguna Compressor Station for purposes of defining the stationary source to be permitted under Title V. As discussed in detail above, the only activities that are controlled by (or are under common control of) Transwestern Pipeline Company or its related entities and that fall within the same SIC Code as the Compressor Station No. 6 - Laguna station are the Thoreau and Mountainair compressor stations. But, under the facts of this case, these stations are too far apart to be "adjacent" to one another. Accordingly, we believe it is reasonable to conclude that only emissions from the Compressor Station No. 6 - Laguna station comprise the "stationary source" subject to the Title V permitting requirements.

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[6] Memorandum from Gina McCarthy, Assistant Administrator, Office of Air and Radiation, titled, *Withdrawal of Source Determinations for Oil and Gas Industries*, dated September 22, 2009, which may be found at http://www.epa.gov/region7/air/nsr/nsrmemos/oilgaswithdrawal.pdf.

[7] In the preamble to the 1980 rulemaking, EPA noted: " . . . the December opinion of the court in Alabama Power sets the following boundaries on the definition for PSD purposes of the component terms of 'source': (1) it must carry out reasonably the purposes of PSD: (2) it must approximate a common sense notion of a 'plant:' and (3) it must avoid aggregating pollutant-emitting activities that as a group would not fit within the ordinary meaning of 'building,' 'structure,' 'facility' or 'installation.' 45 FR 52694-5 (August 7, 1980). As noted above, EPA has indicated that it will apply the three same criteria used in the title V source definition in a manner consistent with the PSD context. *See* 61 Fed. Reg. 34202, 34210 (July 1, 1996).

[8] Executive Office of the President; Office of Management and Budget; Standard Industrial Classification Manual 1987; National Technical Information Service; Springfield, Virginia (1987).

Document #8

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

December 16, 2015

STATEMENT OF BASIS

For draft Air Pollution Control Title V Permit to Operate for Permit Renewal No. R6NM-2-08R2 (replaces R6NM-01-08R1).

The issuing office is: U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

The applicant is: Transwestern Pipeline Company, LLC
4001 Indian School Road
Albuquerque, New Mexico 87110

1. Environmental Protection Agency (EPA) Authority to Issue Part 71 Permits Pursuant to Title V of the Clean Air Act (CAA):

On July 1, 1996 (61 Federal Register (FR) 34202), EPA adopted regulations codified at 40 Code of Federal Regulations (CFR) Part 71 setting forth the procedures and terms under which the Agency would administer a Federal Operating Permits Program. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate EPA's approach for issuing Federal operating permits to covered stationary sources in Indian country.

As described in 40 CFR § 71.4(a), EPA will implement a Part 71 program in areas where a State, local, or tribal agency has not developed an approved Part 70 program. Unlike States, Indian Tribes are not required to develop Operating Permits Programs, though EPA encourages Tribes to do so. *See, e.g.*, Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). Therefore, within Indian country, EPA will administer and enforce a 40 CFR Part 71 Federal Operating Permits Program for stationary sources until a Tribal Nation receives approval to administer their own operating permits programs.

2. Proposed Changes to the Title V Permit (and Associated Construction Permit)

The following changes are being proposed by this title V permit renewal action and related construction permit action:

a. Remove Section 4 entitled "Additional Requirements to be Implemented in Future Activities under the Permit" from the October 17, 2008 Title V permit. This title V permit does not authorize construction activities. Any future construction activities will be

handled under a separate permitting action and any consultation requirements under the Endangered Species Act and National Historic Preservation Act will be addressed at that time.

b. Include 40 CFR Part 63, Subparts A and ZZZZ applicability and requirements to the Waukesha F3520GU Reciprocating Internal Combustion Engine (RICE), Emissions Unit No. 621, which is permitted as an emergency stationary RICE. 40 CFR Part 63, Subpart ZZZZ was promulgated on June 15, 2004, and this engine (Emissions Unit No. 621) is subject to these requirements under the applicability criteria of the rule.

c. Include Potential to Emit emissions data for Particulate Matter less than 2.5 micrograms.

d. Adjust facility-wide source Potential to Emit (PTE) to include $PM_{2.5}$ emissions at 21.934 tpy (see Table 2 for exact changes) and finish updating changes from previous application and permitting actions, to reflect more accurate estimates of PTEs. Revise individual unit PTEs accordingly. Precursors for $PM_{2.5}$, including NOx, SO_2, and VOC are monitored. Remove the Waste Water Heater emissions unit from the PTE Table due to this unit being taken out of service.

e. Include individual fuel use metering monitoring requirements on Waukesha IC engine, Emissions Unit No. 621.

f. Include updated address for submittal of fee payments and fee filing form in Permit Condition 5.1.4.

g. Include credible evidence language, in accordance with requirements under 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 FR 8314 (Feb. 24, 1997).

3. The Laguna Pueblo Tribe:

Tribal Members:	Approximately 8,000
Acreage:	533,000
Location:	45 miles west of Albuquerque, south of I-40
Address:	P.O. Box 194, Laguna, NM 87026
Phone:	505-552-6654 Fax: 505-552-6941
Internet Access:	yes

a. Geographical boundaries: The Pueblo is located within four counties: Cibola, Bernalillo, Valencia and Sandoval Counties. Most of the Pueblo lands are situated in the Datil section of the Colorado Plateaus physiographic province, which is characterized by high mesas, canyons, and abundant evidence of volcanic activity.

b. History: The land around present day Laguna Pueblo has been occupied for over 3,000 years, though the modern Pueblo was not established until 1699. The occupants are said to have been refugees from the Pueblo Revolt of 1680 and represented five Pueblos and four language groups. The residents of Old Laguna formed six villages which include: Mesita, Paguate, Paraje, Encinal, and Seama. Each village, although part of a larger whole, are autonomous to some degree.

c. Current Leadership: Honorable Virgil A. Siow, Governor
David A. Martinez, 1st Lieutenant Governor
Paul D. Pino, 2nd Lieutenant Governor

d. Selection process of tribal leaders: A general election is held the third Monday of December of each even-numbered year. Installation of elected officers is held no later than January 6 of each odd-numbered year.

e. Environmental Office:

Adam M. Ringia (Environmental and Natural Resources Director)
Greg Jojola (Environmental Program Manager)
Vince Rodriguez (Air Quality Specialist)
Deborah Anyaibe (Environmental Specialist)

Phone: 505-552-7512 Fax: 505-552-6857

f. Local air quality and attainment status: The Pueblo is located in a CAA attainment area for all criteria pollutants. However, some parts of nearby Bernalillo County are in a carbon monoxide (CO) maintenance area. The Pueblo currently receives a CAA section 103 grant to assist the Tribal Environmental Air Programs. The following air emissions sources and pollutants were identified by the Pueblo Office of Environmental Protection air quality control program (2000): Laguna Industries, Inc. (solvents), Pueblo Service Company of New Mexico Redonda Compressor Station (nitrogen oxides) and Dancing Eagle Casino (traffic related emissions). Sand and gravel operations are conducted on a very limited scale. Also included are the three industrial storage yards (Bureau of Indian Affairs storage yard, State highway) -

methane gas, hydrocarbons, and Lead; and two pipeline compressor stations (Transwestern and El Paso) - nitrous oxides.

The nearest community, Laguna Subdivision, is located ½ mile north from the Compressor Station #6, and the El Paso Laguna Station is located 4.5 miles southeast of that location. The Old Laguna Village is situated about five miles Northeast from the above Station. Prevailing winds are blowing from West/Southwest directions toward both communities.

4. Facility Information:

a. Location and Mailing Address:

The Transwestern Pipeline Company, Compressor Station No. 6 (Laguna) is located 0.5 miles south of Laguna, New Mexico in Cibola County, Latitude: 35° 01' 56"; Longitude: 107° 40' 40". The mailing address is:

Transwestern Pipeline Company
8501 Jefferson N.E.
Albuquerque, NM 87110

b. Facility Contact/ Responsible Official

The responsible official is Dave Roybal [(575) 347-6514], and the facility contact is Lawrence Campbell [(575) 625-8022].

c. Source Description - Operations and Products

Transwestern Pipeline Company, LLC (Transwestern) Compressor Station No. 6 – Laguna, with Standard Industrial Classification code 4922, is a natural gas compression and transmission facility with pressurized natural gas as its principal product. The facility was initially constructed in 1967 and has not been modified since the enactment of the CAA in 1970. The compressor station receives natural gas through an inlet line which passes through an inlet separator. The inlet gas is then compressed by one of three engine driven gas compressors. After compression, the natural gas exits the facility. The compressor engines are Clark TVC-12 engines each rated at 4,500-Horse Power (hp). These units were installed in 1967 and have the following serial numbers: Emissions Unit No. 601 with serial number 107510; Emissions Unit No. 602 with serial number 107511; and Emissions Unit No. 603 with serial number 107512. Emissions Unit No. 621 is a Waukesha F3520GU

auxiliary unit is rated at 470-hp and is a gas-fired engine driven generator which provides emergency electric power to the Laguna Compressor Station; the serial number for Emissions Unit No. 621 is 129011. The permit requires the source keep records of the serial numbers for all emissions units, and any changes in the serial numbers should be reflected in the report filed with EPA, as required by Conditions 3.2.7 and 3.2.9 of the permit. Products of combustion from the compressor and generator engines exhaust through independent stacks. In addition to the four RICE units discussed above, other significant emission sources include a 500 barrel pipeline liquids tank (Emissions Unit No. T-2) and a 1,100-gallon mist extractor vessel (Emissions Unit No. MIST). Table 1 lists the calculated PTE for these units as well as for the area Fugitive Emissions (FUG), emissions associated with Startups, Shutdowns, and Malfunctions (MAIN-SSM), and emissions related to Truck Loading Operations (Emissions No. TRUCK). As discussed below, insignificant emission sources include several storage tanks for storing new and used lube oils, antifreeze (ethylene glycol), oily waste water, and pipeline liquids. See Table 4. For additional information and an analysis of all the emission units which constitute the stationary source, please see the source determination which may be found in the record for this permit renewal action.

d. Permitting and/or Construction History

The Compressor Station No. 6 - Laguna is currently owned and operated by Transwestern Pipeline Company, LLC which commenced operations in 1967. The previous title V permit was issued on October 17, 2008 as Permit No. R6NM-01-08R1, and the initial title V permit was issued as Permit No. R6FOPP71-01 on December 6, 2002.

A permit application dated October 31, 2012, was received requesting a Part 71 Operating Permit renewal. Additional requested information to supplement the permit renewal application has been submitted to EPA on the following dates: August 11th and 20th, 2014, October 2nd and 14th, 2015.

e. Potential to Emit

Table 1 includes the potential to emit data provided by Transwestern. Potential to emit means the maximum capacity of a source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operations or on the type or amount of material combusted, stored, or processed, may be treated as part of its design if the limitation is enforceable by EPA. Potential to Emit is not meant to be a worst case single emission calculation alone, but to represent the maximum operating range of the source units at design specifications and operational design

(reflective of normal operating conditions) through years of verifiable data. Individual actual emissions may be much lower.

According to the records supplied by the applicant, Compressor Station No. 6 - Laguna is presented as a "grandfathered" source, which means that its construction predates the effective date of EPA's new source review programs. The Potential to Emit (PTE) provided in the permit as well as in this statement of basis, is for informational purposes only, except with respect to compliance with stated performance in the application for permit renewal (see further discussion on this subject below). Generally, the title V permit does not prescribe limits for these "grandfathered" units, so the PTEs presented for the "grandfathered" units are for informational purposes, although other specific parameters related to the calculation of PTE will be monitored (see further discussion below). Compressor Station No. 6 - Laguna does not appear to be subject to any requirements of federal programs under the New Source Performance Standards (NSPS), but the Waukesha engine (Emissions Unit No. 621) is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary RICE, 40 CFR Part 63, Subpart ZZZZ. The PTE for Emissions Unit No. 621 is based upon its operation as an emergency stationary RICE under 40 CFR Part 63, Subpart ZZZZ. The 2SLB RICE (Emissions Units Nos. 601, 602, and 603) are exempt from the requirements of Subpart ZZZZ, as provided for in 40 CFR § 63.6590(b)(3)(i). Requirements of the New Mexico State Implementation Plan (SIP) do not apply to this source, as the compressor station is located within the exterior boundaries of the Laguna Pueblo. Emissions from the facility will be calculated from recorded parameters in the permit and tracked through annually submitted Fee Schedules (which include annual reports on criteria pollutant and hazardous air pollutant (HAP) actual emissions), to ensure that future changes to the source do not trigger federal CAA requirements.

IC Engine heat input rates: Transwestern updated its Potential to Emit for all pollutants in the permit renewal application sent to EPA on October 31, 2012, and clarified with additional information on August 11th and 20th, 2014. The Company has confirmed that all engines at this site have had no physical or operation changes which may have increased the emission rate of the units beyond their operational capacity in the previous title V/Part 71 permit.

Table 1. Potential to Emit in Tons per Year (tpy)
Transwestern Pipeline Company, LLC, Compressor Station No. 6 – Laguna
Uncontrolled[1] emissions. See Table 6 for applicable limits.

Emissions Unit and Unit ID	NOx	VOC	SO_2	$PM_{2.5}$	PM_{10}[2]	CO	Lead	HAP[3]	GHG
601, Clark TVC-12, NG fired Engine	498.4	18.22	0.09	7.31	7.31	151.2	0	11.6	17,757.12
602, Clark TVC-12, NG fired Engine	498.4	18.22	0.09	7.31	7.31	151.2	0	11.6	17,757.12
603, Clark TVC-12, NG fired Engine	498.4	18.22	0.09	7.31	7.31	151.2	0	11.6	17,757.12
621, Waukesha	0.46	0.01	.0001	0.004	0.004	0.78	0	0.01	24.57
FUG		1.34						0.001	513.90
MIST, 1,100 Gal. Tank		5.54						0.02	2,200.0
T-2, 500 Bbl. Tank		28.17						0.06	11,080.0
TRUCK, Truck Loading		0.04						0.01	
MAIN –SSM		0.92						0.0009	272.42
TOTALS	1,495.66	90.68	0.2701	21.934	21.934	454.38	0	34.9019	67,362.25

[1] Uncontrolled emissions for informational purposes only (except with respect to Waukesha engine HAP emission rates – see Table 6 below)
[2] The PM_{10} emission levels for the source are within an attainment area. Precursors for $PM_{2.5}$, including NOx, SO_2, and VOC are monitored for "grandfathered" units or controlled for NESHAP applicable units.
NOx - oxides of nitrogen
VOC - volatile organic compounds
SO2 - sulfur dioxide
PM10 - particulate matter with a diameter 10 microns or less

CO - carbon monoxide
HAP - hazardous air pollutants (*see* CAA Section 112(b))
[3] Mostly formaldehyde.

Table 2. Change in Emission Pollutant Versus Total Emissions, tons/year for Regulated and Unregulated Units

Pollutant	Total Emissions, tons/year Current Permit	Total Emissions, tons/year Proposed Permit	Total Emissions, tons/year Proposed Change
NOx	1,498.1	1,495.66	-2.44
SO_2	0.3	0.2701	-0.0299
CO	457.5	454.38	-3.12
$PM_{2.5}$	N/A	21.934	+21.934
PM_{10}	22	21.934	-0.066
VOC	69.7	90.68	+20.98
Lead	0	0	0
HAPs	34.3	34.9019	+0.6019

f. Emission Units and Emission Generating Activities

Transwestern Pipeline Company, Compressor Station No. 6 - Laguna provided in their application the information contained in tables 1, 3, and 4. All emission units and control devices at this facility are identified in tables 3 and 4. Table 2 lists changes in emissions proposed between the currently permitted levels and the proposed permitted levels. Emission units identified as "insignificant" are listed separately in table 4.

40 CFR Part 71 allows sources to separately list in the permit application units or activities that qualify as "insignificant" based on potential emissions below 2 tons/year for all regulated pollutants that are not listed as HAPs under Section 112(b) and below 1000 pounds/year or the de minimus level established under Section 112(g), whichever is lower, for HAPs. Units that qualify as "insignificant" for the purposes of the Part 71 permit application are in no way exempt from applicable requirements or any requirements of the Part 71 permit.

Table 3. Emission Units and Control Devices

Unit No.	Type of Unit Serial No.	Manufacturer Model No. Design Heat Input	Operating Range or Size of Unit	Date of Installation	Primary Use	Control Equipment
601	Natural gas fired Engine, #107510	Clark TVC-12 34.65 MMBtu/hr	4500 hp	1967	Compressor drive	None
602	Natural gas fired Engine, #107511	Clark TVC-12 34.65 MMBtu/hr	4500 hp	1967	Compressor drive	None
603	Natural gas fired Engine, #107512	Clark TVC-12 34.65 MMBtu/hr	4500 hp	1967	Compressor drive	None
621	Natural gas fired engine, # 129011	Waukesha F3520GU 4.2 MMBtu/hr	470 hp	1967	Emergency generator	None
MIST	Fixed roof storage tank		1,100 gal.	1966	Natural Gas Condensate	None
T-2	Fixed roof storage tank		500 Bbl.	1966	Natural Gas Condensate	None

Transwestern Pipeline Company, Compressor Station No. 6 (Laguna) states in its application and additional submitted information that the emission units in Table 4 below are eligible for insignificant treatment under 40 CFR § 71.5(c)(11)(ii). Most of these emission sources are fixed roof storage tanks used to store organic liquids, including ethylene glycol, oily water, lube oil, and petroleum-based solvents. Other insignificant emission sources at the facility includes system starters and blowdown activities; and fugitive emissions from connections, flanges, open-ended lines, valves, and other components, and pipeline liquids truck loading point.

Table 4. Insignificant Emission Units

Number of Units	Description of Emissions Units	RAP except HAP	HAP
1	Fugitive Emissions	Yes	Yes
3	Clark TCV-1 Engine 601, 602 and 603 Blowdowns and Starters	Yes	Yes
1	Waukesha Engine F3520GU Blowdowns and Starters	Yes	Yes
1	210-bbl Oily Water Tank	Yes	Yes
2	210-bbl Engine Lube Oil Tank	Yes	Yes
2	65-bbl Ethylene Glycol Tank	Yes	Yes
1	65-bbl Used Ethylene Glycol Tank	Yes	Yes
2	65-bbl Used Lube Oil Tank	Yes	Yes
1	Solvent Degreaser	Yes	Yes

5. Applicable Requirements and Limitations

The source will continue to comply with all applicable requirements. For applicable requirements that will become effective during the term of the permit, the source will meet such requirements on a timely basis. In particular, the permittee will comply with the following:

Table 5: Applicable Regulations: Transwestern Pipeline Company, LLC Compressor Station No. 6 - Laguna

Citation	Requirement	Comment
40 CFR Part 71	Federal Operating Permits Program	All Emissions Units
40 CFR Part 63, Subpart A	General Provisions	Emissions Unit No. 621
40 CFR Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Emissions Unit No. 621

a. National Emissions Standards for Hazardous Air Pollutants (NESHAP)

(1) Based on the information provided in Transwestern's application, the potential to emit for VOC includes 34.8923 tons/year of formaldehyde, a change of +0.5923 tons per year (tpy) from the current permit. This change is the result of recalculations of emissions from stack tests, and is not the result of a physical change or change in method of operation or construction at the source.

Compressor Station No 6 – Laguna is a "major source" under CAA section 112 since it has the potential to emit Hazardous Air Pollutants (HAPs) in quantities more than 10 tpy of any one listed HAP or ≥ 25 tpy of total HAPs. In addition, Emissions Unit No. 621, a 4-stroke rich burn (4SRB) engine is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ - Reciprocating Internal Combustion Engines (RICE) and will be permitted as an emergency stationary RICE. The other three RICE units (Emissions Unit Nos. 601, 602, and 603) are two-stroke-lean-burn (2SLB) engines, each with a site rating of more than 500 brake HP, as identified in the application for permit renewal and confirmed with additional information submitted by the applicant. All four RICE are considered "existing stationary RICE," under the Subpart ZZZZ, because the RICE were constructed and operating at the source prior to December 19, 2002. Furthermore, the 2SLB RICE (Emissions Units Nos. 601, 602, and 603) are exempt from the requirements of Subpart ZZZZ, as provided for in 40 CFR § 63.6590(b)(3)(i). Under this exemption, these three RICE do not have to meet the requirements of 40 CFR Part 63, Subpart ZZZZ or Subpart A, including initial notification requirements. However, the existing 4SRB RICE (Emissions Unit No. 621) is subject to 40 CFR Part 63, Subpart ZZZZ, as specified in 40 CFR § 63.6602. Because it is being permitted as an emergency stationary RICE, Emissions Unit No. 621 is subject to and governed by the provisions of 40 CFR 63.6640(f) as well, including the following:

Table 6: Maximum Allowable Emission Rates and Requirements
(MACT required at 100 percent load plus or minus 10 percent)

Unit	Emission limitations or requirement
621	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. 40 CFR 63.6625(h) and Table 2c.

Emergency stationary SI RICE and black start stationary SI RICE. 40 CFR 63, Table 2c, Box 6.	a. Change oil and filter every 500 hours operation or annually, whichever comes first. b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(2) As a major source of HAPs, this facility would be potentially subject to the emission standards of 40 CFR Part 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, because they process and/or store natural gas. However, these activities occur after the point of custody and are classified in the Natural Gas Transmission category; thus, the Transwestern Pipeline Company Compressor Station No. 6 - Laguna is not subject to these requirements.

(3) As a major source of HAPs, this facility would also be potentially subject to the emission standards of 40 CFR Part 63, Subpart HHH - National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities, because they have been identified in this category. However, there are no glycol dehydration units at this station, which are the affected units for Subpart HHH. Therefore, this facility is not subject to these requirements.

5.1. Additional Requirements

Transwestern's Compressor Station No. 6 - Laguna permit renewal application was reviewed to determine if it meets all the requirements of the 40 CFR Part 71 Operating Permits Program. Based on the information provided by company in the application and subsequently submitted information, Compressor Station No. 6 - Laguna will be subject to the following generic permit requirements:

a. Fuel Usage Rates:

The fuel type used at this facility is natural gas which is used in Emissions Unit Nos. 601, 602, 603, and 621. The maximum annual usage rate determined that a reasonable PTE for Emissions Unit Nos. 601 through 603 is 289 mmscf/yr and Emissions Unit No. 621 is 35.04 mmscf/yr. Based on this information, the combined total amount of natural gas

burned at this facility shall not exceed 902.04 mmscf per year. Monitoring, recordkeeping, and reporting requirements have been placed in the permit to ensure compliance with these fuel usage amounts.

b. Heat Input:

The maximum design heat input for Emissions Unit Nos. 601, 602 and 603 has been determined to be 34.65 MMBtu/hr, and the maximum design heat input for Emissions Unit No. 621 has been determined to be 4.2 MMBtu/hr. Monitoring, recordkeeping, and reporting requirements have been placed in the permit to ensure compliance with these heat input rates.

c. Recordkeeping:

Although this facility is not subject to any federal applicable requirements for criteria pollutants, the facility will be required to keep the following records in general:

(1) serial number for each emission unit;
(2) records of repair and maintenance activities which shall include identification of emission units and the work involved;
(3) monthly and annual 12-month rolling average recordkeeping of the fuel flow/consumption of each reciprocating engine; and
(4) monthly and annual 12-month rolling average recordkeeping of the actual heat input for each reciprocating engine.

d. Other Requirements

(1) 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

The federal CAM regulations require certain sources to comply with additional monitoring requirements if specific applicability criteria are met. The criteria are related to emission limitations or standards for applicable regulated air pollutants, the use of a control device to achieve compliance with the limitation or standard, or the unit potential pre-control device emissions of applicable regulated air pollutants at specified amounts. In the case of this facility, the three RICE (Emissions Units Nos. 601, 602, and 603) are not subject to an emission limitation or standard, and are not equipped with controls. Therefore, CAM is not applicable to these units. The remaining emergency stationary RICE (Emissions Unit No. 621) is subject to the NESHAP requirements found at 40 CFR Part 63, Subpart ZZZZ.

(2) Other Applicable Requirements

Based on the information provided in the Transwestern's application, EPA has no evidence that this source is subject to any other existing federally applicable programs for emission controls. Federal CAA programs include Prevention of Significant Deterioration, New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants, and the acid rain program under Title IV of the CAA. For applicable requirements, see further discussion on requirements under National Emission Standards for Hazardous Air Pollutants in Section 5.d above. Further, Transwestern Pipeline Company Compressor Station No. 6 - Laguna is not subject to any implementation plan, such as exist within State jurisdictions. Therefore, based upon information submitted by the applicant, Transwestern Pipeline Company, Compressor Station No. 6 - Laguna is not subject to any further substantive requirements that control its emissions under the CAA, other than those described under Section 5.a above and the collection, recordkeeping and reporting requirements necessary to substantiate compliance and verify the PTE amounts found in Table 1.

(3) Additional Conditions

a. Monitoring

(i) The Transwestern Pipeline Company will be required to monitor the heat input rate of all the engines to verify the PTE amounts specified in Table 1 above. If the emissions rate of any RICE deviate more than 2% increase from the individual PTE of that RICE or the total PTE of the source, then the Company will be required to evaluate the deviation and determine if there has been a change in the method of operation of the engines or a physical change to the engines, and reapply for a modification to the permit with cause. A condition will be placed in the permit for this purpose. Monitoring of heat input rate of each RICE will occur once per month, with calculations of compliance based on a twelve (12) month rolling average. The Company will be required to operate all equipment in accordance with manufacturer's design values for that equipment.

(ii) The Company has fuel monitoring on the Waukesha engine (Emissions Unit No. 621) on a single meter. Therefore, the Company will be

required to separately monitor this engine to assure compliance with the fuel use limit established in this permit.

b. Combustion: As the fuel use rated limits are based on use of pipeline quality natural gas, the source will continue to be required to burn only pipeline quality natural gas for combustion in the Clark IC engines (Emissions Units Nos. 601 through 603) and Waukesha IC engine (Emissions Unit No. 621). Pipeline quality natural gas is defined as sweet natural gas of pipeline quality containing a maximum of 0.25 grains of H_2S per 100 cubic feet. Should the source require a fuel source change other than pipeline quality natural gas, they must first apply for modification to the permit to account for any increases in emissions. The source will continue to comply with emission standards for an emergency stationary RICE, as set forth in 40 CFR Part 63, Subpart ZZZZ, for the Waukesha engine (Emissions Unit No. 621).

6. Fee Schedule and Annual Compliance Reports

Transwestern has provided the Region with annual estimates of actual emissions for all regulated pollutants for fee payment purposes and annual compliance reports for the current Part 71 permit. The source must continue to submit annual estimates of actual emissions for all regulated pollutants as part of the requirement to pay an annual fee (see Section 5.1 of the permit), and annual compliance certifications and reports (see Section 5.3 of the permit).

7. Credible Evidence:

Language is placed in the permit which states that credible evidence may be used to demonstrate whether a source would have been in compliance with applicable requirements of the permit, if the appropriate performance or compliance test, using specific methods or procedure to assess compliance, had been performed for purposes of Title V compliance certifications. Also, nothing in the permit will preclude the use, including exclusive use, of credible evidence or information by any person for purposes of establishing whether or not a source is in violation of permit conditions or limitations.

8. Notice and Comment

a. Public Notice

As described in 40 CFR § 71.11(a)(5), all part 71 draft operating permits will be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR § 71.11(d).

There will be a 30-day public comment period for actions pertaining to a draft permit. Public notice has been given for this draft permit by mailing a copy of the notice to the permit applicant, the affected State, tribal and local air pollution control agencies, the city and county executives, the State and Federal land managers and the local emergency planning authorities which have jurisdiction over the area where the source is located. A copy of the notice has also been provided to all persons who have submitted a written request to be included on the mailing list. If you would like to be added to our mailing list to be informed of future actions on these or other CAA permits issued in Indian Country located within the State of New Mexico, please send your name and address to Randy Pitre at the address listed below:

Randy Pitre
Air Permits Section
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue (6PD-R)
Dallas, TX 75202
E-mail: pitre.randy@epa.gov

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

b. Opportunity for Comment

Members of the public may review a copy of the draft permit prepared by EPA, the application, this statement of basis for the draft permit, and all supporting materials for the draft permit. Copies of these documents are available at:

Pueblo of Laguna Library
P.O. Box 194
Laguna, NM 87026
Phone # (505) 552-6280

U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202
Phone #: (214) 665-7229
or (214) 665-6435

Copies of the draft permit and this statement of basis are also available electronically on the EPA Region 6 Website, http://yosemite.epa.gov/r6/Apermit.nsf/Part71 .

Any interested person may submit written comments on the draft Part 71 operating permit during the public comment period to Randy Pitre at the address listed in section 8.a above. All comments shall be considered and answered by EPA in making the final decision on the permit. EPA will keep a record of the commenter and of the issues raised during the public participation process.

Anyone, including the applicant, who believes any condition of the draft permit is inappropriate must raise all reasonable ascertainable issues and submit all arguments supporting their position by the close of the public comment period. Any supporting materials submitted must be included in full and may not be incorporated by reference, unless the material has been already submitted as part of the administrative record in the same proceeding, or consists of State or Federal statutes and regulations, EPA documents of general applicability, or other generally available reference material.

c. Opportunity to Request a Hearing:

A person may submit a written request for a public hearing to Randy Pitre, at the address listed in section 8.a above, by stating the nature of the issues to be raised at the public hearing. EPA will hold a public hearing whenever EPA finds there is a significant degree of public interest in a draft operating permit. The EPA will provide public notice of the public hearing. If a public hearing is held, any person may submit oral or written statements and data concerning the draft permit.

Document #9

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

DEC 21 2015

Mr. Dave Roybal
Director of Operations
Transwestern Pipeline Company, LLC
8501 Jefferson, N.E.
Albuquerque, New Mexico 87113

RE: Transwestern Pipeline Company, LLC – Application for Renewal of Operating Permit, Compressor Station No. 6 - Laguna, Part 71 Title V Permit Number R6NM-2-08R2 (replaces R6NM-01-08R1)

Dear Mr. Roybal:

We are in receipt of your renewal application dated October 31, 2012, and supporting documentation dated August 11 and 20, 2014. Additional application information requested and received in our office on October 2 and 14, 2015, provided clarification for statements contained in the renewal application.

In accordance with Title V of the Clean Air Act and 40 Code of Federal Regulations (CFR) Part 71, the U.S. Environmental Protection Agency (EPA) has determined that cause exists for a renewal of the Part 71 Title V permit. Requirements found in 40 CFR § 71.11 state notice shall be provided on the preparation of a draft permit. The EPA will publish a public notice of the permitting action in a local newspaper of general circulation and allow for a 30-day public comment period. We will notify you of the date of public notice for submission of comments and the opportunity to request a public hearing.

Enclosed is a copy of the statement of basis, public notice, and draft permit for your review. Copies of these documents may also be obtained at the EPA Region 6 Web Site: http://www.epa.gov/caa-permitting/part-71-operating-permits-tribal-lands-epas-south-central-region. The draft permit and the statement of basis will also be available at the Pueblo of Laguna Library in Laguna, New Mexico. The EPA will consider and answer all comments in making its final decision on the permit and keep a record of the persons commenting and the issues raised during the public participation process.

Should you have any questions regarding the draft permit, please feel free to contact Randy Pitre of my staff at the above address, or e-mail at pitre.randy@epa.gov, or telephone at (214) 665-7299.

Sincerely yours,

Wren Stenger
Director, Multimedia Planning and Permitting Division

Enclosures

cc: (w/Enclosures)
Adam M. Ringia
Environmental and Natural Resources Director
Pueblo of Laguna Environmental Program

Ms. Jeanne Hoadley
Air and Water Quality Specialist
Santa Fe National Forest

CDR Meredith Bond, P.E., USPHS
Deputy Chief
U.S. Fish and Wildlife Service
Branch of Air Quality

Mr. John Bunyak
Chief, Policy, Planning and Permit Review Branch
Air Resources Division
National Park Service - AIR

FEDERAL CLEAN AIR ACT TITLE V OPERATING PERMIT

FOR

TRANSWESTERN PIPELINE COMPANY, LLC

COMPRESSOR STATION No. 6 - LAGUNA

LAGUNA, CIBOLA COUNTY, NEW MEXICO

Based On
40 Code of Federal Regulations (CFR) Part 71
Federal Operating Permit Program
Promulgated July 1, 1996

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

FEDERAL CLEAN AIR ACT TITLE V OPERATING PERMIT

Issue Date:	--/--/----	Permit Number: R6NM-2-08R2
Effective Date:	--/--/----	Replaces Permit Number: R6NM-01-08R1
Expiration Date:	--/--/----	

In accordance with the provisions of title V of the Clean Air Act and 40 CFR Part 71 and applicable rules and regulations,

Transwestern Pipeline Company, LLC
Compressor Station No. 6 - Laguna
Laguna, Cibola County, New Mexico

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

This source is authorized to operate in the following location(s):

0.5 miles south of Laguna, New Mexico in Cibola County,
Latitude: 35° 01' 56"; Longitude: 107° 40' 40"
Laguna Pueblo in New Mexico

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by the Environmental Protection Agency (EPA) and citizens under the Clean Air Act.

Any control measure and/or equipment not properly installed, operated and maintained will be considered a violation of the permit.

The permit number cited above should be referenced in future correspondence regarding this facility.

Wren Stenger
Director
Multimedia Planning and Permitting Division
United States Environmental Protection Agency

Date

TABLE OF CONTENTS

Terms, Abbreviations and Acronyms

Source	Transwestern Pipeline Company, LLC, Compressor Station No. 6 - Laguna
Facility	Transwestern Pipeline Company, LLC, Compressor Station No. 6 - Laguna
CAA	Clean Air Act [42 United States Code Section 7401 et seq.]
CFR	Code of Federal Regulations
HAP	Hazardous Air Pollutant
hr	hour
ID. No.	Identification Number
MMBtu	Million British Thermal Units
mmscf/yr	Million Standard Cubic Feet per year
NOx	Nitrogen Oxides
PM10	Particulate matter less than 10 microns in diameter
PM2.5	Particulate matter less than 2.5 microns in diameter
SO_2	Sulfur Dioxide
EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
IC engine	internal combustion engine – formerly referred to as reciprocating engine

List of Tables

1. Source Identification and Unit Specific Information

1.1. General Source Information

Owner and Operator:	Transwestern Pipeline Company, LLC 8501 Jefferson N.E. Albuquerque, New Mexico 87113
Plant Name:	Compressor Station No. 6 - Laguna
Plant location:	0.5 miles South of Laguna, New Mexico
EPA Region:	6
State:	New Mexico
Tribe:	Laguna
County:	Cibola
Reservation:	Laguna Pueblo
Plant mailing address:	8501 Jefferson N.E. Albuquerque, New Mexico 87113
Responsible Official:	Dave Roybal Director of Operations Transwestern Pipeline Company, LLC 8501 Jefferson N.E. Albuquerque, New Mexico 87113 Phone: (575) 347-6514
Plant Contact:	Lawrence Campbell Transwestern Pipeline Company, LLC 8501 Jefferson N.E. Albuquerque, New Mexico 87113 Phone: (575) 625-8022

Standard Industrial Code (SIC) Code: 4922

Aerometric Information Retrieval System (AIRS) Facility System Plant ID. No.:
R6NM-2-08R2 (replaces R6NM-01-08R1)

Description of Process: Transwestern Pipeline Company, LLC, Compressor Station No. 6 – Laguna, with SIC code 4922, is a natural gas compression and transmission facility with pressurized natural gas as its principal product.

1.2. Source Emission Points and Potential to Emit

Table 1 below provides important information related to significant emissions units at Transwestern Pipeline Company, LLC's Compressor Station No. 6 – Laguna, including dates of installation, size of the units, serial numbers, and any associated control equipment. Table 2 lists the potential to emit (PTE) of air pollutants from the source which will be used to determine and report deviations to EPA, as required by Conditions 3.2.6.4 and 3.2.9 of this permit.

Table 1: Source Emission Points and Control Devices – Transwestern Pipeline Company, LLC, Compressor Station No. 6 - Laguna

Unit No.	Type of Unit Serial No.	Manufacturer Model No. Design Heat Input	Operating Range or Size of Unit	Date of Installation	Primary Use	Control Equipment
601	I/C Engine 107510	Clark TVC-12 34.65 MMBtu/hr	4500-HP	1967	Compressor drive	None
602	I/C Engine 107511	Clark TVC-12 34.65 MMBtu/hr	4500-HP	1967	Compressor drive	None
603	I/C Engine 107512	Clark TVC-12 34.65 MMBtu/hr	4500-HP	1967	Compressor drive	None
621	RIC Engine 129011	Waukesha 4.2 MMBtu/hr	470-HP	1967	Electrical generation	None
MIST		Fixed Roof Storage Tank	1,100-GAL	1966	Natural Gas Condensate	None
T-2		Fixed Roof Storage Tank	500-BBL	1966	Natural Gas Condensate	None

Table 2: Potential to Emit in Tons per Year (tpy)[1] – Transwestern Pipeline Company, Compressor Station No. 6 - Laguna

Unit ID	NOx	VOC	SO2	PM2.5	PM10[2]	CO	Lead	HAP[3]	GHG
601, Clark TVC-12, NG fired Engine,	498.4	18.22	0.09	7.31	7.31	151.2	0	11.6	17,757.12
602, Clark TVC-12, NG fired Engine,	498.4	18.22	0.09	7.31	7.31	151.2	0	11.6	17,757.12
603, Clark TVC-12, NG fired Engine,	498.4	18.22	0.09	7.31	7.31	151.2	0	11.6	17,757.12
621, Waukesha F3520GU, NG Engine	0.46	0.01	0.0001	0.004	0.004	0.78	0	0.01	24.57
FUG		1.34						0.001	513.90
MIST 1,100 Gal. Tank		5.54					0	0.02	2,200.0
T-2, 500 Bbl. Tank		28.17					0	0.06	11,080.0
Truck Loading		0.04					0	0.01	
MAIN - SSM		0.92						0.0009	272.42
TOTALS tpy	1,495.66	90.68	0.2701	21.934	21.934	454.38	0	34.9019	67,362.25

[1] Numbers contained in this table are for uncontrolled emissions, are for information purposes only, and are not an enforceable conditions. See Condition 4.2 for applicable enforceable limitations.

[2] The PM_{10} emission levels for the source are within an attainment area. Precursors for $PM_{2.5}$, including NOx, SO_2, and VOC are monitored for "grandfathered" units or controlled for NESHAP applicable units. While the PM_{10} emission rates for the Clark engines are listed for informational purposes, they may not be reflective of PTE for these engines, as they could represent calculations from a bad test. *(total PM_{10} emission levels for this source in the attainment area are considered deminimus for implementation of the $PM_{2.5}$ Rule, and therefore $PM_{2.5}$ monitoring will not be required in this permit action.)*

NOx - oxides of nitrogen
VOC - volatile organic compounds (non-HAP)
SO2 - sulfur dioxide
PM10 - particulate matter with a diameter 10 microns or less
CO - carbon monoxide

HAP - hazardous air pollutants (see CAA Section 112(b))
NG - natural gas
[3] Mostly formaldehyde

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; or

2.1.3. The ability of the EPA to obtain information from a source under Section 114 of the CAA.

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.

3. Applicable Requirements and General Permit Conditions

3.1. Applicable Requirements

The source will continue to comply with all applicable requirements. For applicable requirements that will become effective during the term of the permit, the source will meet such requirements on a timely basis. The permittee shall comply with all the applicable requirements of federal regulations. In particular, the permittee shall comply with the following:

Table 3: Applicable Requirements for Transwestern Pipeline Company, LLC Compressor Station No. 6 - Laguna

Citation	Requirement	Comment
40 CFR 71	Federal Operating Permits Program	Unit Nos. 601, 602, 603, 621
40 CFR 63, Subpart A	General Provisions	Unit No. 621
40 CFR 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)	Unit No. 621

The Transwestern Pipeline Company, LLC, Compressor Station No. 6 - Laguna application was reviewed for compliance with the Part 71 Operating Permit Program. Based on the information provided by Transwestern Pipeline Company, LLC in their application, Compressor Station No. 6 (Laguna) would be subject to the following General Permit Requirements:

3.2. General Permit Requirements

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

3.2.1. All equipment shall be operated in accordance with the manufacturer's design values for that equipment.

3.2.2 The amount of natural gas burned in the following emissions units shall not exceed the following amounts on a rolling 12-month average:

Emissions Unit No. 601 – 289 mmscf/yr;
Emissions Unit No. 602 – 289 mmscf/yr
Emissions Unit No. 603 – 289 mmscf/yr
Emissions Unit No. 621 – 35.04 mmscf/yr

3.2.3. The actual heat input for Emissions Unit No. 601, Emissions Unit No. 602, and Emissions Unit No. 603 shall not exceed 34.65 MMBtu/hr, adjusted for elevation; and for Emissions Unit No. 621, the actual heat input shall not exceed 4.2 MMBtu/hr, adjusted for elevation.

3.2.4. Compliance Tests: Compliance tests from units at this source will be conducted, using applicable EPA Methods established within 40 CFR Part 51, Appendix M, or as otherwise specified in the permit by applicable requirements.

3.2.5. Monitoring

3.2.5.1. Fuel consumption for Emissions Unit Nos. 601, 602, 603 and 621 shall be monitored with a flow meter monthly for each unit, in MMscf (of natural gas).

3.2.5.2. Heat input rate for Unit Nos. 601, 602, 603, and 621 shall be monitored Monthly on a per unit basis for individual highest rate in MMBtu/hr.

3.2.6. Reporting/Recordkeeping

3.2.6.1. The permittee shall keep records on all startup, shutdown, repair and maintenance activities performed on all emission units. These records shall identify the relevant emission unit and describe the work performed, and calculate any associated emissions.

3.2.6.2. The fuel flow/consumption for each emissions unit (Unit Nos. 601, 602, 603, and 621) shall be recorded on a monthly basis and an annual 12-month rolling average.

3.2.6.3. The records of fuel consumption shall be maintained for each emission unit (Unit Nos. 601, 602, 603, and 621), for the last five years.

3.2.6.4 The actual heat input rate for emission Unit Nos. 601, 602, 603, and 621 shall be recorded on a monthly average basis as well as an annual 12-month rolling average. If the emissions rate of any of the engines deviates more than 2% above the PTE listed in Table 2 of this permit, then the permittee shall evaluate the deviation to determine if there has been a physical change or change in method of operation at the source, report the deviation and the results of the evaluation to EPA in the report required by Condition 3.2.9 below, and apply for a modification of this permit, if necessary.

3.2.6.5. The records of heat input shall be maintained for emission Unit Nos. 601, 602, 603, and 621, for at least the last five years.

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

3.2.7. The permittee shall keep records of the serial numbers for each emission unit. The emission units for the RICE and their serial numbers are: Unit No. 601 with serial number 107510; Unit No. 602 with serial number 107511; Unit No. 603 with serial number 107512; Unit No. 621 with serial number 129011.

3.2.8. Retention of 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.

3.2.9. The permittee shall submit to the EPA reports of any monitoring and recordkeeping 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

4. Engine NESHAP Requirements

4.1 General Provisions

The permittee shall comply with the requirements from the NESHAP General Provisions, 40 CFR Part 63, Subpart A, for Emissions Unit No. 621 only.

4.2. Requirements for Emissions Unit No. 621

4.2.1. For Emissions Unit No. 621, the permittee shall meet the requirements in 4.2.2 through 4.2.4 below.

4.2.2. Change oil and filter every 500 hours of operation or annually, whichever comes first; inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and inspect all hoses and

belts every 500 hours of operation or annually, whichever comes first, and replace as necessary [40 CFR § 63.6002, Table 2c].

4.2.3. Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply [40 CFR § 63.6002, Table 2c].

4.2.4. Permittee must install a non-resettable hour meter, if one is not already installed. [40 CFR § 63.6625(f)]

4.3 General Compliance Requirements for Unit No. 621

4.3.1. Emissions Unit No. 621 must be in compliance with the operating limitations and requirements in Condition 4.2 at all times [40 CFR § 63.6605(a)].

4.3.2. The permittee must operate and maintain Unit No. 621, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions [40 CFR § 63.6605(b)].

4.4. Performance Requirements for Unit No. 621

4.4.1 As an emergency stationary RICE, the permittee must operate Emissions Unit No. 621 according to the requirements of 40 CFR § 63.6640(f).

4.4.2 Any operation other than emergency operation, maintenance and testing emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs f(1) through (4) of 40 CFR § 63.6640, is prohibited [40 CFR § 63.6640(f)].

4.4.3 If Emissions Unit No. 621 is not operated according to the requirements in 40 CFR § 63.6640(f)(1) through (f)(4), Emissions Unit No. 621 will not be considered an emergency stationary RICE and it must meet all requirements for non-emergency engines [40 CFR § 63.6640(f)].

4.4.4 There is no time limit on the use of emergency stationary RICE in emergency situations [40 CFR § 63.6640(f)(2)].

4.4.5 Emissions Unit No. 621 may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours per year for non-

emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power as part of a financial arrangement with another entity [40 CFR § 63.6640(f)(3)].

4.4.6 Permittee may operate Emissions Unit No. 621 for any combination of the purposes specified in 40 CFR § 63.6640(f)(2)(i) through (iii) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs 40 CFR § 63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by this paragraph [40 CFR § 63.6640(f)(2)].

4.5 Continuous Compliance Requirements for Emissions Unit No. 621

Emissions Unit No. 621 shall be operated and maintained according to the manufacturer's emission-related operation and maintenance instructions. In the alternative, permittee may develop and follow its own maintenance plan which must provide to the extent practicable for the maintenance and operation of Emission Unit No. 621 in a manner consistent with good air pollution control practice for minimizing emissions [40 CFR § 63.6640(a), Table 6].

4.6 Recordkeeping Requirements for Emissions Unit No. 621

4.6.1. You must keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR § 63.10(b)(2)(xiv).

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

4.6.3. Records of all required maintenance performed on any air pollution control and monitoring equipment.

4.6.4. The permittee must keep records of the operating and maintenance conducted on Emissions Unit No. 621 necessary to ensure compliance with Condition 4.5 above.

4.7 Reporting Requirements for Emissions Unit No. 621

4.7.1. Permittee must report each instance in which an applicable emissions limitation, operating limitation or requirement in 40 CFR Part 63, Subpart ZZZZ, Table 2(c) is not met.

4.7.2. These instances are deviations from the emission and operating limitations in 40 CFR Part 63, Subpart ZZZZ. These deviations must be reported according to the requirements in 40 CFR § 63.6650.

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 [40 CFR § 71.9(a)].

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

For regular US postal service mail	For non-US Postal Service express mail (FedEx, Airborne, DHL, and UPS)
US Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center PO Box 979078 St. Louis, MO 63197-9000	U.S. Bank Government Lockbox 979078 US EPA FOIA & Misc. Payments 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101
Contact: Craig Steffen 513-487-2091, or Eric Volck 513-487-2105	Contact: 314-418-1028

For electronic payment (identify permit number for payment in form)

Automated Clearinghouse (ACH) for receiving US currency
PNC Bank
ABA: 051036706
Account Number: 310006
CTX Format Transaction Code 22 – checking

Environmental Protection Agency
808 17th Street, NW
Washington, DC 20074

Contact: Jesse White 301-887-6548

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 [Note that an annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR § 71.9(h), has been incorporated into the fee calculation worksheet form as a convenience].

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 [See 40 CFR § 71.9(c)(6)].

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 [40 CFR § 71.9(e)(2)].

5.1.6.1.3. The term "regulated pollutant (for fee calculation)" is defined in 40 CFR § 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. See 40 CFR § 71.9(c)(5)(i).

5.1.6.2.2. Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation. See 40 CFR § 71.9(c)(5)(ii).

5.1.6.2.3. The insignificant quantities of actual emissions not required to be listed or calculated in a permit application pursuant to 40 CFR § 71.5(c)(11) [40 CFR § 71.9(c)(5)(iii)].

5.1.7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official in accordance with 40 CFR § 71.5(d).

5.1.8. The permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for five years following submittal of fee payment. Emission-related data include, 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 40 CFR § 71.6(a)(3)(ii) [See 40 CFR § 71.9(i)].

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 40 CFR § 71.9(l).

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 [See 40 CFR § 71.9(m)].

5.1.11. When notified by EPA of underpayment of fees, the permittee shall remit full payment within 30 days of receipt of notification [See 40 CFR § 71.9(j)(1) and (2)].

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 a written explanation of the alleged error to EPA along with full payment of the assessed fee [See 40 CFR § 71.9(j)(3)].

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 [40 CFR §§ 71.6(a)(6)(i) and (ii)].

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 [Section 113(a) and 113(e)(1) of the CAA].

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 40 CFR § 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 40 CFR §§ 71.6(c)(5)(iii)(D) and 71.6(c)(6).

5.4. Duty to Provide and Supplement Information

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. [40 CFR §§ 71.6(a)(6)(v) and 71.5(b)]

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 Branch,
Mailcode: 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,

Mailcode: 6PD-R
1445 Ross Avenue
Dallas, TX 75202-2733

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.

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.

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 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 EPA;

5.8.5. Incorporates into this 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 in section 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. [Note to permittee: If these subparagraphs do not apply, please contact EPA for a determination as to similarity prior to submitting your request for an administrative permit amendment under this provision].

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 40 CFR § 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 40 CFR § 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

5.9.3.4. Completed forms for the permitting authority to use to notify affected States as required under 40 CFR § 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 40 CFR § 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 shield under 40 CFR § 71.6(f) may not extend to minor permit modifications [See 40 CFR § 71.7(e)(1)(vi)].

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 40 CFR § 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 40 CFR § 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 40 CFR § 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 40 CFR § 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 40 CFR § 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.

5.10.4. The permit shield under 40 CFR § 71.6(f) may not extend to group processing of minor permit modifications. [See 40 CFR § 71.7(e)(1)(vi)].

5.11. Significant Permit Modifications [40 CFR § 71.7(e)(3)]

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.

5.11.2. Nothing herein shall be construed to preclude the permittee from making changes consistent with 40 CFR Part 71 that would render existing permit compliance terms and conditions irrelevant.

5.11.3. Permittees must meet all requirements of 40 CFR 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 40 CFR § 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change. [See 40 CFR §§ 71.7(e)(3)(ii) and 71.5(a)(2).]

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 40 CFR § 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.

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.

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 40 CFR 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.

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.

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 40 CFR § 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

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.

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 part 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 40 CFR § 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 40 CFR 71.6(f) may extend beyond the original

permit term until renewal.

5.17.4. The permittee's failure to have a 40 CFR 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.

5.18. Credible Evidence: (40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997))

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements, if the appropriate performance or compliance test or procedure had been performed, shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

Document #10

PUBLIC NOTICE

Transwestern Pipeline Company

Compressor Station No. 6 - Laguna

ANNOUNCEMENT OF DRAFT PERMIT, OPPORTUNITY TO REQUEST A PUBLIC HEARING, AND REQUEST FOR PUBLIC COMMENT ON DRAFT CLEAN AIR ACT TITLE V PERMIT

Public Comment Period January 8, 2016 to February 8, 2016

Notice of Intent to Issue a Clean Air Act, Title V, Federal Operating Permit, United States Environmental Protection Agency (EPA), Region 6, Multimedia Planning and Permitting Division.

Take notice that the United States Environmental Protection Agency has received an application for the renewal and update of an operating permit for the following stationary source:

The Transwestern Pipeline Company Compressor Station No. 6 - Laguna, located 1/2 mile south of Laguna, New Mexico. The mailing address is: Transwestern Pipeline Company, 8501 Jefferson, N. E., Albuquerque, New Mexico 87113.

The Transwestern Pipeline Company Compressor Station No. 6 – Laguna is located on the Pueblo of Laguna Reservation, Cibola County, New Mexico. The source is a natural gas compression and transmission facility with pressurized natural gas as its principal product. The source emits the following pollutants: carbon monoxide, particulate matter with diameters 2.5 and 10 microns or less, oxides of nitrogen, sulfur dioxide, volatile organic compounds, hazardous air pollutants and greenhouse gas emissions. This action proposes the following annual emission increases and decreases to the facility's potential to emit (PTE) on a ton per year (tpy) basis at the Transwestern Pipeline Company Compressor Station No. 6 - Laguna: -2.44 tpy of nitrogen oxides (NO_x), -0.0299 tpy of sulfur dioxide (SO_2), -3.12 tpy of carbon monoxide (CO), -0.066 tpy of particulate matter less than 10 micrometers in diameter (PM_{10}), 21.934 tpy of particulate matter less than 2.5 micrometers in diameter ($PM_{2.5}$), 20.98 tpy of Volatile Organic Compounds (VOC), 0.6019 tpy of Hazardous Air Pollutants (HAPs), 25.1204 tpy of Formaldehyde (HCHO), and 67,362.25 tpy of Greenhouse Gas Emissions (GHG CO_{2e}) .

This source is subject to the provisions of EPA permit R6NM-01-08R1 and is required to obtain a Clean Air Act Title V Renewal Permit to Operate in accordance with Part 71 of Title 40 of the Code of Federal Regulations (CFR). The permit will contain all the Clean Air Act requirements that apply to the source and is subject to the administrative requirements of 40 CFR § 71.11.

Members of the public may review a copy of the draft permit prepared by EPA, the statement of basis for the draft permit, the application, and all relevant supporting materials at the EPA Region 6 web site, http://www2.epa.gov/caa-permitting/part-71-operating-permits-tribal-lands-epas-south-central-region, or by contacting:

Randy Pitre
Air Permits Section
Multimedia Division
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202
Phone (214) 665-7299
Email pitre.randy@epa.gov

All data submitted by the applicant are available as part of the administrative record and will be available for review at the EPA Region 6 office, Monday – Friday, from 7:30 a.m. - 4:30 p.m., excluding Federal holidays. Documents will also be available at the Laguna Public Library, 29 Rodeo Drive, Laguna, New Mexico, 87026, phone 505-552-6280. Please call in advance to arrange viewing times.

If you have comments on the draft permit, you must submit them on or before February 8, 2016. You have the right to request a public hearing on the draft permit. If EPA determines that there is a significant amount of public interest in the draft permit, the EPA has the right to hold a public hearing. Any request for a public hearing must be received by the EPA either by email or mail by January 29, 2016, and must state the nature of the issues proposed to be raised in the hearing. Attendance at the public hearing is not required in order to submit written comments. *If the EPA determines that there is significant public interest*, a public hearing will be held on Wednesday, February 24, 2016, from 5:00 p.m. to 7:00 p.m. at the following location:

Environmental and Natural Resources Department (ENRD)
Pueblo of Laguna
Kawaika Center
22 Bay Tree Road
Paraje, NM 87007
Phone (505) 552-7512

If a public hearing is held, the public comment period shall automatically be extended to the close of the public hearing. The EPA maintains the right to cancel a public hearing if no request for a public hearing is received by January 29, 2016, or the EPA determines that there is not a significant interest. *If the public hearing is cancelled*, notification of the cancellation will be posted by February 2, 2016, on the EPA's Website

http://www2.epa.gov/caa-permitting/part-71-operating-permits-tribal-lands-epas-south-central-region. Individuals may also call the EPA at the contact number listed above to determine if the public hearing has been cancelled.

All comments and public hearing requests should be addressed to:

Randy Pitre
Air Permits Section
Multimedia Division
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202
Email: pitre.randy@epa.gov

All comments received by February 8, 2016, and all comments made during a public hearing will be considered in arriving at a final decision on the permit. Additionally, all comments will be included in the administrative record without change, and may be made available to the public, including any personal information provided, unless the comment includes Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Thus, CBI or other protected information should be clearly identified as such, and should not be submitted through email. Emails sent directly to the EPA will capture your email address automatically and will be included as a part of the public comment. Please note that an email or postal address must be provided with your comments if you wish to receive a statement of reasons for changes made to the draft permit and responses to comments submitted during the public comment period.

If you believe any condition of the draft permit is inappropriate or that our initial decision to deny an application, terminate a permit, or prepare a draft permit is inappropriate, you must raise all reasonably ascertainable issues and submit all reasonably ascertainable arguments supporting your position by the close of the public comment period. Any supporting materials that you submit must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this permit proceeding or consist of State, tribal, or Federal statutes and regulations, EPA documents of general availability, or other generally available reference materials.