9400 Holly Avenue NE | Bldg 3, Suite 300 | Albuquerque, NM 87122 | P (505) 266-6611
trinityconsultants.com

Via Email: R6AirPermitsTribal@epa.gov and braganza.bonnie@epa.gov

September 4, 2019

Ms. Bonnie Braganza
U.S. EPA, Region 6 Tribal Permitting Contact
1445 Ross Ave., suite 1200
6MM-AP
Dallas, TX 7520

RE: Application for Title V Renewal
El Paso Natural Gas Company LLC – Laguna Compressor Station

Dear Ms. Braganza:

On behalf of El Paso Natural Gas Company LLC, we are submitting an application for a Title V Renewal for the Laguna Compressor Station. The facility is 5 miles southeast of Laguna, New Mexico in Cibola County. This submittal is pursuant to 40 CFR § 71.5(a)(1)(iii) which requires a Title V renewal application be submitted 6 months prior to expiration of permit. The Title V Operating Permit R6NM-02-09R1 will expire 03/18/2020. The format and content of this application are consistent with the Agency's current policy regarding Title V applications.

Attached to this email is a searchable Adobe Acrobat (PDF) file of the application. Please feel free to contact either myself at (505) 266-6611 or Richard Duarte, Sr. EHS Engineer of El Paso Natural Gas LLC, at (505) 831-7763 if you have any questions regarding this application.

Sincerely,

Jane Romero Kotovsky
Senior Consultant

Cc: Richard Duarte
Trinity Project File 193201.0109

FEDERAL OPERATING PERMIT PROGRAM

TITLE V RENEWAL APPLICATION

El Paso Natural Gas Company, LLC

Laguna Compressor Station

Prepared By:

Kinder Morgan
5151 E. Broadway Blvd., Suite 1680
Tucson, AZ 85711
(520) 663-4200

TRINITY CONSULTANTS
9400 Holly Ave NE
Bldg 3 Suite 300
Albuquerque, NM 87122
(505) 266-6611
September 2019

Project 193201.0109

Trinity Consultants

Environmental solutions delivered uncommonly well

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY

This application is being submitted for the renewal of Title V Operating Permit R6NM-02-09R1 for Laguna Compressor Station. The facility is owned and operated by El Paso Natural Gas Company, L.L.C (EPNG), a Kinder Morgan company. The facility is 5 miles southeast of Laguna, New Mexico in Cibola County. This submittal is pursuant to 40 CFR § 71.5(a)(1)(iii) which requires a Title V renewal application be submitted 6 months prior to expiration of permit. The Title V Operating Permit will expire 03/18/2020.

Laguna Compressor Station is a compressor station which compresses natural gas for transportation purposes. Equipment at the facility include three (3) Clark TLA-10 natural gas fired engines and two (2) auxiliary Ingersoll-Rand engines.

No physical or emission changes have been made to the Laguna Compressor Station since the previous Title V Renewal; however, names, addresses, telephone numbers and other administrative information have been updated where applicable.

2. OPERATING AIR PERMIT APPLICATION FORM

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name _Laguna Compressor Station_____

Mailing address: Street or P.O. Box 7445 Pan American Freeway, Ste 202_

City _Albuquerque_ State _NM_ ZIP _87109_

Contact person: _Richard Duarte_____Title _Sr. EHS Engineer__

Telephone (_505_) _831_ - _7763__ Ext. _____

Facsimile (_505_) _831_ - _7734_

B. Facility Location

Temporary source? ___Yes _X_ No Plant site location _UTM: Zone 13S, 288537. m E 3874784. m N

NW ¼, SE ¼ Section 24, Township 9-N, Range 5-W_____

City _Albuquerque__ State _NM_ County _Cibola_ EPA Region _6_

Is the facility located within:

Indian lands? _X_YES ___ NO An offshore source in federal waters? ___YES _X_ NO

Non-attainment area? ___ YES _X_NO If yes, for what air pollutants? _NA_

Within 50 miles of affected State? _X_ YES __ NO If yes, What State? NM Albuquerque/Bernalillo Co._

C. Owner

Name _El Paso Natural Gas Company, L.L.C. (EPNG)_

Street/P.O. Box 2 North Nevada Ave

City __Colorado Springs___ State _CO_ ZIP _80903_

Telephone (_505_) _831_ - _7763_ Ext_____

D. Operator

Name _El Paso Natural Gas Company, L.L.C. (EPNG)_

Street/P.O. Box 2 North Nevada Ave

City __Colorado Springs___ State _CO_ ZIP _80903_

Telephone (_505_) _831_ - _7763_ Ext_____

E. Application Type

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

___Initial Permit _X_ Renewal ___ Significant Mod ___ Minor Permit Mod(MPM)

___ Group Processing, MPM ___ Administrative Amendment

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

For permit renewal, what is the expiration date of current permit? 3/18/2020

F. Applicable Requirement Summary

Mark the types of applicable requirements that apply:

___ SIP _X_ FIP/TIP ___ PSD ___Non-attainment NSR

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

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

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

___ Section 129 ___ NAAQS, increments or visibility but for temporary sources (This is rare)

Is the source subject to the Deepwater Port Act? ___YES _X_NO

Has a risk management plan been registered? ___YES _X_NO Agency _N/A_

Phase II acid rain application submitted? ___YES _X_NO If YES, Permitting Authority _N/A_

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

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

According to Section 3.2 General Permit Requirements: The engines (A-01, A-02,A-03, AUX A-01 AUX A-02) are limited/restricted by the flowrate and heat input of the fuel gas being sent to the engines.

H. Process Description

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

Process	Products	SIC
Natural Gas Compression and Transmission	Pipeline Quality Natural Gas	4922

I. Emission Unit Identification

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

Emissions Unit ID	Description of Unit
A-01	Natural Gas-Fired Compressor Engine: Clark TLA-10
A-02	Natural Gas-Fired Compressor Engine: Clark TLA-10
A-03	Natural Gas-Fired Compressor Engine: Clark TLA-10
AUX A-01	Natural Gas-Fired Auxiliary Engine (Power Generation): Ingersoll-Rand PSVG-8
AUX A-02	Natural Gas-Fired Auxiliary Engine (Power Generation): Ingersoll-Rand PSVG-8

J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each regulated 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 _2121.6_ tons/y VOC _93.2_ tons/yr SO2 _7.0_ tons/yr

PM-10 _22.4_ tons/yr CO _722.1_ tons/yr Lead _0_ tons/yr

Total HAP _36.1_ tons/yr

Single HAP with greatest amount _Formaldehyde_ PTE _24.5_ tons/yr

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

K. Existing Federally-Enforceable Permits

Permit number R6NM-02-09R1 Permit type Title V Operating Permit Permitting authority EPA Region 6

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

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit _N/A_____

Check one: ___ Application made ___ Coverage granted

General permit identifier _____ Expiration Date ____/____/____

M. Cross-referenced Information

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

INSTRUCTIONS FOLLOW

3. FORM EUD-1 – EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID A-01 Description Natural Gas-Fired Compressor Engine

SIC Code (4-digit) 4922 SCC Code 2-02-002-52

B. Emissions Unit Description

Primary use Natural Gas Compression Temporary Source ___Yes _**X**_No

Manufacturer Clark Model No. TLA-10

Serial Number 79007 Installation Date _01 / 1958_

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

Other (describe) _____

Boiler horsepower rating N/A Boiler steam flow (lb/hr) N/A

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

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input 33.26 MM BTU/hr Max. Design Heat Input 33.26 MM BTU/hr

C. Fuel Data

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

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

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline Quality Natural Gas	< 0.016%	N/A	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline Quality Natural Gas	109.4 MMSCF (2007)	36,500 SCF (LHV)	319.5 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID **N/A** Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date_____/_____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

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

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

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

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

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID A-02 Description Natural Gas-Fired Compressor Engine

SIC Code (4-digit) 4922 SCC Code 2-02-002-52

B. Emissions Unit Description

Primary use Natural Gas Compression Temporary Source ___Yes _**X**_No

Manufacturer Clark Model No. TLA-10

Serial Number 79008 Installation Date _01 / 1958_

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

Other (describe) _____

Boiler horsepower rating N/A Boiler steam flow (lb/hr) N/A

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

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input 33.26 MM BTU/hr Max. Design Heat Input 33.26 MM BTU/hr

C. Fuel Data

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

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

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline Quality Natural Gas	< 0.016%	N/A	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline Quality Natural Gas	115.3 MMSCF (2007)	36,500 SCF (LHV)	319.5 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID **N/A** Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date_____/_____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

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

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

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

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

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID A-03 Description Natural Gas-Fired Compressor Engine

SIC Code (4-digit) 4922 SCC Code 2-02-002-52

B. Emissions Unit Description

Primary use Natural Gas Compression Temporary Source ___Yes _**X**_No

Manufacturer Clark Model No. TLA-10

Serial Number 79005 Installation Date _01 / 1958_

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

Other (describe) _____

Boiler horsepower rating N/A Boiler steam flow (lb/hr) N/A

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

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input 33.26 MM BTU/hr Max. Design Heat Input 33.26 MM BTU/hr

C. Fuel Data

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

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

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline Quality Natural Gas	< 0.016%	N/A	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline Quality Natural Gas	88.8 MMSCF (2007)	36,500 SCF (LHV)	319.5 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID **N/A** Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date_____/_____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

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

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

Stack temp (^{o}F) _____._____ Design stack flow rate (ACFM) _____._____

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

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID AUX A-01 Description Natural Gas-Fired Compressor Engine

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

B. Emissions Unit Description

Primary use: Power Generation (auxiliary engine) Temporary Source ___Yes _**X**_No

Manufacturer Ingersoll-Rand Model No. PSVG-8

Serial Number 8CPST227 Installation Date _09 / 1958_

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

Other (describe) _____

Boiler horsepower rating N/A Boiler steam flow (lb/hr) N/A

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

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

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

C. Fuel Data

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

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

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline Quality Natural Gas	< 0.016%	N/A	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline Quality Natural Gas	29.2 MMSCF (2007)	8,914 SCF (LHV)	78.1 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID **Catalyst-1** Device type: **Non-Selective Catalyst**

Air pollutant(s) Controlled NOx, CO, CH_2O Manufacturer DCL International

Model No. QUICK LID Catalytic Converter Serial No. N/A

Installation date 06/30/2007 Control efficiency (%) 76%

Efficiency estimation method EPA Method 323

F. Ambient Impact Assessment

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

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

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

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

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID AUX A-02 Description Natural Gas-Fired Compressor Engine

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

B. Emissions Unit Description

Primary use: Power Generation (auxiliary engine) Temporary Source ___Yes _**X**_No

Manufacturer Ingersoll-Rand Model No. PSVG-8

Serial Number 8CPST228 Installation Date _09 / 1958_

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

Other (describe) _____

Boiler horsepower rating N/A Boiler steam flow (lb/hr) N/A

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

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

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

C. Fuel Data

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

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

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Pipeline Quality Natural Gas	< 0.016%	N/A	912 Btu/scf (LHV)

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Pipeline Quality Natural Gas	29.2 MMSCF (2007)	8,914 SCF (LHV)	78.1 MMSCF (LHV)

E. Associated Air Pollution Control Equipment

Emissions unit ID **Catalyst-2** Device type: **Non-Selective Catalyst**

Air pollutant(s) Controlled NOx, CO, CH_2O Manufacturer DCL International

Model No. QUICK LID Catalytic Converter Serial No. N/A

Installation date 06/30/2007 Control efficiency (%) 76%

Efficiency estimation method EPA Method 323

F. Ambient Impact Assessment

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

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

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

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

4. FORM EMISS – EMISSIONS CALCULATIONS

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

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: A-01

B. Identification and Quantification of Emissions

For each emissions unit identified above, list each regulated air pollutant or other pollutant for which the source is major, 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. See instructions concerning GHGs. Values should be reported to the nearest tenth (0.1) of a ton for yearly values or tenth (0.1) 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)	
NO_X		139.6	611.4	
CO		32.3	141.3	
VOC		5.8	25.6	
SO_X		0.5	2.0	
PM_{10}		1.6	7.0	
LEAD		-	-	
HAP		2.6	11.6	

United States Environmental Protection Agency

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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: A-02

B. Identification and Quantification of Emissions

For each emissions unit identified above, list each regulated air pollutant or other pollutant for which the source is major, 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. See instructions concerning GHGs. Values should be reported to the nearest tenth (0.1) of a ton for yearly values or tenth (0.1) 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)	
NO_X		139.6	611.4	
CO		32.3	141.3	
VOC		5.8	25.6	
SO_X		0.5	2.0	
PM_{10}		1.6	7.0	
LEAD		-	-	
HAP		2.6	11.6	

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

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: A-03

B. Identification and Quantification of Emissions

For each emissions unit identified above, list each regulated air pollutant or other pollutant for which the source is major, 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. See instructions concerning GHGs. Values should be reported to the nearest tenth (0.1) of a ton for yearly values or tenth (0.1) 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)	
NO_X		139.6	611.4	
CO		32.3	141.3	
VOC		5.8	25.6	
SO_X		0.5	2.0	
PM_{10}		1.6	7.0	
LEAD		-	-	
HAP		2.6	11.6	

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

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: AUX A-01

B. Identification and Quantification of Emissions

For each emissions unit identified above, list each regulated air pollutant or other pollutant for which the source is major, 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. See instructions concerning GHGs. Values should be reported to the nearest tenth (0.1) of a ton for yearly values or tenth (0.1) 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)	
NO_X		32.8	143.7	
CO		34.0	149.1	
VOC		1.4	6.3	
SO_X		0.1	0.5	
PM_{10}		0.2	0.7	
LEAD		-	-	
HAP		0.1	0.6	

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

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: AUX A-02

B. Identification and Quantification of Emissions

For each emissions unit identified above, list each regulated air pollutant or other pollutant for which the source is major, 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. See instructions concerning GHGs. Values should be reported to the nearest tenth (0.1) of a ton for yearly values or tenth (0.1) 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)	
NO_X		32.8	143.7	
CO		34.0	149.1	
VOC		1.4	6.3	
SO_X		0.1	0.5	
PM_{10}		0.2	0.7	
LEAD		-	-	
HAP		0.1	0.6	

5. FORM IE – INSIGNIFICANT EMISSIONS

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

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	Basis for Treatment as Insignificant Activities	RAP (except HAP)	HAP
40 Events a year	Fugitive VOC emissions from connections, flanges, open-ended lines, valves, and other components.	40 CFR 71.5(c)(11)(ii)(A & B) Estimated emissions <2 tpy regulated pollutants, <0.5 tpy HAPs For compressor facilities with 40 or less reciprocating engines and/or turbines, estimated emissions using GRI-HAPCalc v3.0 are less than the de minimis limit. Component estimate is based on GRIHAPCalc's default estimate for a compressor station (6 turbines and 6 engines), normalized to a permnit basis. REFER to attached GRI-HAPCalc estimate.	X	X
20 Events a year	Emergency Shut Down system and pressure relief valves	40 CFR 71.5(c)(11)(ii)(A & B) Estimated emissions <2 tpy regulated pollutants, <0.5 tpy HAPs	X	X
50 Events a year	Blowdown activities (during startup & shutdown)	40 CFR 71.5(c)(11)(ii)(A & B) Estimated emissions <2 tpy regulated pollutants, <0.5 tpy HAPs	X	X
Two (2) Heater Units	Two heater units	40 CFR 71.5(c)(11)(i)(D). These heater units are used “for human comfort that do not provide heat for any manufacturing or other industrial process”.	X	X
Three (3) Ethylene Glycol Tanks	Ethylene Glycol Tank	40 CFR 71.5(c)(11)(ii)(A & B) Estimated emissions <2 tpy regulated pollutants, <0.5 tpy HAPs	X	X
Nine (8) Fuel Storage Tank	Fuel Oil Storage Tanks with capacity of 40,000 gallons or less	40 CFR 71.5(c)(11)(ii)(A & B) Estimated emissions <2 tpy regulated pollutants, <0.5 tpy HAPs Any emissions unit, operation, or activity that handles or stores a VOC or HAP organic liquid with a vapor pressure less than 1.5 psia.	X	X

Emission Estimations

Natural gas and/or LPG-fired pieces of equipment

There is a natural gas-fired space heater and a hot water heater at Laguna. These units qualify as insignificant activities based on 40 C.F.R. 71.5(c)(11)(i)(D): “Heating units used for human comfort that do not provide heat for any manufacturing or other industrial process.”

Storage tanks containing liquids with a vapor pressure < 1.5 psia

There is three ethylene glycol tank at the site. We ran the TANKS 4.0.9d model for a 210-bbl tank containing ethylene glycol (a HAP) with a vapor pressure of 0.0006 psia. We very conservatively assumed one turnover per day. The TANKS printout for Tank “Insig14” is attached. Total emissions are 0.85 lb per year (0.0004 tpy). This type of tank is insignificant for criteria pollutants and HAPs.

Diesel and Fuel-oil storage tanks < 40,000 gallons

The following lube oil and diesel fuel tanks are located at Laguna:

Tank	Capacity (gal)
AUX. Lube Oil Tank	8,820
Main Engine Lube Oil	8,820
Northern-most Buried Used Oil Tank near East Fence	1,000
Southern-most, Buried Used Oil/Water Tank near East Fence	1,000
Eastern-most Used Oil Tank near South Fence	734
Western-most Used Oil Tank at Comp. Bldg.	734
Upper-most Used Oil Tank at Comp. Bldg.	734
Lower-most Used Oil Tank at Comp. Bldg.	734

As a conservative estimate of maximum emissions from tanks in this category, we ran the TANKS 4.0.9d model for a 40,000 gallon tank containing diesel fuel. We very conservatively assumed one turnover per day. The TANKS printout for Tank “Insig16” is attached. Total VOC emissions for this type of tank were determined to be 77 lb per year, or 0.04 tons/yr. This type of tank is therefore insignificant for criteria pollutants and HAPs.

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

Identification

User Identification:	Insig14
City:	Albuquerque
State:	New Mexico
Company:	EPNG
Type of Tank:	Vertical Fixed Roof Tank
Description:	Ethylene glycol storage tank

Tank Dimensions

Shell Height (ft):	15.00
Diameter (ft):	10.00
Liquid Height (ft) :	15.00
Avg. Liquid Height (ft):	7.50
Volume (gallons):	8,812.81
Turnovers:	365.00
Net Throughput(gal/yr):	3,216,675.13
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)	0.06

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 - Summary Format
Liquid Contents of Storage Tank

Insig14 - 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
Ethylene glycol	All	58.54	51.41	65.66	56.17	0.0006	0.0004	0.0010	62.0678			62.07	Option 2: A=8.21211, B=2161.91, C=208.43

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

Emissions Report for: Annual

Insig14 - Vertical Fixed Roof Tank
Albuquerque, New Mexico

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Ethylene glycol	0.77	0.08	0.85

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

Identification

User Identification:	Insig16
City:	Albuquerque
State:	New Mexico
Company:	EPNG
Type of Tank:	Vertical Fixed Roof Tank
Description:	40,000-gallon diesel fuel tank

Tank Dimensions

Shell Height (ft):		19.00
Diameter (ft):		19.00
Liquid Height (ft) :		19.00
Avg. Liquid Height (ft):		9.50
Volume (gallons):		40,298.04
Turnovers:		365.00
Net Throughput(gal/yr):		14,708,783.14
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)		0.06

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 - Summary Format
Liquid Contents of Storage Tank

Insig16 - 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
Distillate fuel oil no. 2	All	58.54	51.41	65.66	56.17	0.0062	0.0048	0.0079	130.0000			188.00	Option 1: VP50 = .0045 VP60 = .0065

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

Emissions Report for: Annual

Insig16 - Vertical Fixed Roof Tank
Albuquerque, New Mexico

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Distillate fuel oil no. 2	70.33	7.31	77.63

6. FORM PTE – POTENTIAL TO EMIT SUMMARY

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
POTENTIAL TO EMIT (PTE)

For each emissions unit at the facility, list the unit ID and the PTE of each air pollutant listed below and sum the values to determine the total PTE for the facility. It may be helpful to complete form **EMISS** before completing this form. Report each pollutant at each unit to the nearest tenth (0.1) of a ton; values may be reported with greater precision (i.e., more decimal places) if desired. Report facility total PTE for each listed pollutant on this form and in section **J** of form **GIS**. The HAP column is for the PTE of all HAPs for each unit. You may use an attachment to show any pollutants that may be present in major amounts that are not already listed on the form (this is not common).

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which Source is Major (PTE in tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
A-01	611.4	25.6	2.0	7.0	141.3	-	11.6
A-02	611.4	25.6	2.0	7.0	141.3	-	11.6
A-03	611.4	25.6	2.0	7.0	141.3	-	11.6
AUX A-01	143.7	6.3	2.0	0.7	149.1	-	0.6
AUX A-02	143.7	6.3	2.0	0.7	149.1	-	0.6
Facility Start Stop and Maintenance (SSM) of natural gas venting events.	0.0	3.8	2.0	0.0	149.1	-	0.1
FACILITY TOTALS:	**2121.6**	**93.2**	**7.0**	**22.4**	**722.1**	**-**	**36.1**

"-" No emissions are expected

7. FORM FEE – FEE CALCULATION WORKSHEET

The 2018 Fee Calculation Worksheet was submitted on 07/19/2019 in the amount of ($2,482.07) (check # 64286). The 2018 Fee Calculation Worksheet is attached below for references purposes only.

El Paso Natural Gas Company, L.L.C.
a Kinder Morgan company

July 19, 2019

Ms. Bonnie Braganza, P. E.
U.S. Environmental Protection Agency – Region 6
Air Permits Section, 6PD-R
1445 Ross Ave.
Dallas, TX 75202

FedEx 2nd Day Service & Email
#7885 6118 5597

RE: 2018 Annual Emission Fees per Title V (Part 71)
Laguna Compressor Station – El Paso Natural Gas Company, LLC

Dear Ms. Braganza:

El Paso Natural Gas Company, LLC (EPNG) hereby submits the 2018 emission and associated fees for Laguna Compressor Station, located on the Pueblo of Laguna, Cibola County, New Mexico. The following information is enclosed:

- 2018 actual emission estimates (including Form FEE and certification by the Responsible Official)
- Form FF - Fee Filing
- Copy of payment for 2018 actual emissions ($2,482.07).
- Emission calculation methodology

Please note that the estimated fees are based on $52.81 per ton of criteria pollutant.

If you have any questions regarding the enclosed information, please contact me at (505) 831-7763 or by email at Ricardo_Duarte@kindermorgan.com.

Sincerely,

Richard Duarte
Sr. EHS Engineer

Attachments

Cc (with enclosures):
Environmental Director
Environmental Division
Pueblo of Laguna
P. O. Box 194
Laguna, New Mexico 87026

Blind Copy (w/ enclosures):

Larry Macias (hard copy)

File: Laguna Compressor Station – Air File #03

ATTACHMENT 1
FORM FEE (FEE CALCULATION WORKSHEET)

EPA United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)

FEE CALCULATION WORKSHEET (FEE)

Use this form initially, or thereafter on an annual basis, to calculate part 71 fees.

A. General Information

Type of fee (Check one): ___Initial _X_Annual

Deadline for submitting fee calculation worksheet 07 / 20 / 2019

For initial fees, emissions are based on (Check one):

_✓_ Actual emissions for the preceding calendar year. (Required in most circumstances.)

___ Estimates of actual emissions for the current calendar year. (Required when operations commenced during the preceding calendar year.)

Date commenced operations ____/____/_____

___ Estimates of actual emissions for the preceding calendar year. (Optional after a part 71 permit was issued to replace a part 70 permit, but only if initial fee payment is due between January 1 and March 31; otherwise use actual emissions for the preceding calendar year.)

For annual fee payment, you are required to use actual emissions for the preceding calendar year.

B. Source Information: Complete this section only if you are paying fees but not applying for a permit.

Source or facility name Laguna Compressor Station

Mailing address: Street or P.O. Box 2 North Nevada Avenue

City Colorado Springs State CO ZIP 80903

Contact person Richard Duarte Title Sr. Pipeline Engineer

Telephone (505) 831 - 7763 Ext___ Part 71 permit no. R6NM-02-09R1

C. Certification of Truth, Accuracy and Completeness: Only needed if not submitting a separate form CTAC.

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal (form and attachments) are true, accurate and complete.

Name (signed) Philip L Baca

Name (typed) Philip L. Baca Date: 7 / 18 / 19

D. Annual Emissions Report for Fee Calculation Purposes -- Non-HAP

You may use this to report actual emissions (tons per year) of regulated pollutants (for fee calculation) on a calendar-year basis for both initial and annual fee calculation purposes. Section E is designed to report HAP emissions. Quantify all actual emissions, including fugitives, but do not include insignificant emissions and certain regulated air pollutants that are not counted for fee purposes, such as CO (see instructions). You may round to the nearest tenth of a ton on this form. Sum the emissions in each column and enter a subtotal at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000 for that column.

This data is for 2018 (year)

Emission Unit ID	NOx	VOC	SO2	PM10	Lead	Other
A01	7.8238	0.4016	0.0033	0.1606	0	0
A02	26.2128	1.2845	0.0107	0.5138	0	0
A03	9.2889	0.5831	0.0049	0.2332	0	0
AUXA01	0.0	0	0	0	0	0
AUXA02	0.0	0	0	0	0	0
SUBTOTALS	43.3255	2.2692	0.0189	0.9077		

E. Annual Emissions Report for Fee Calculation Purposes -- HAP

HAP Identification. Identify individual HAP emitted at the facility, identify the CAS number, and assign a unique identifier for use in the second table in this section. Whenever assigning identifier codes, use "HAP1" for the first, "HAP2" for the second, and so on.

Name of HAP	CAS No	Identifier
Formaldehyde	50-00-0	HAP 01
Acetaldehyde	75-07-0	HAP 02
Acrolein	107-02-8	HAP 03

HAP Emissions. Report the actual emissions of individual HAP identified above. Use the identifiers assigned in the table above. Include all emissions, including fugitives, and do not include insignificant emissions. You may round to the nearest tenth of a ton. Sum the emissions in each column and enter a subtotal at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000.

This data is for 2018 (year)

Emissions Unit ID	Actual Emissions (Tons/Year)							
	HAP_01	HAP_02	HAP_03	HAP___	HAP___	HAP___	HAP___	HAP___
A01	0.1847	0.0260	0.0260					
A02	0.5909	0.0831	0.0833					
A03	0.2682	0.038	0.038					
AUXA01	0	0	0					
AUXA02	0	0	0					
SUBTOTALS	**1.044**	**0.147**	**0.147**					

F. Fee Calculation Worksheet

This section is used to calculate the total fee owed for both initial and annual fee payment purposes. Reconciliation is only for cases where you are paying the annual fee and you used any type of estimate of actual emissions when you calculated the initial fee. If you do not need to reconcile fees, only complete line 1-5 and then skip down to lines 21 – 26. See instructions for more detailed explanation.

EMISSIONS SUMMARY

1. Sum the subtotals from section D of this form (non-HAP) and enter the total, rounded to the nearest tenth (0.1) of a ton.	46.521
2. Sum the subtotals from section E of this form (HAP) and enter the total, rounded to the nearest tenth (0.1) of a ton.	1.34
3. Sum lines 1 and 2.	47.859
4. Enter the emissions that were counted twice. If none, enter "0."	1.34
5. Subtract line 4 from line 3, round to the nearest ton, and enter the result here. This is the **total emissions** that count for fees purposes.	47.0

RECONCILIATION (WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "CURRENT" CALENDAR YEAR)

Only complete lines 6-10 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year in which you paid initial fees; otherwise skip to line 11 or to line 21.

6. Enter the total estimated actual emissions for the year the initial fee was paid (previously reported on line 5 of the initial fee form).
7. If line 5 is greater than line 6, subtract line 6 from line 5, and enter the result. Otherwise enter "0."
8. If line 6 is greater than line 5, subtract line 5 from line 6, and enter the result. Otherwise enter "0."
9. If line 7 is greater than 0, multiply line 7 by last year's fee rate ($/ton) and enter the result here. This is the underpayment. Go to line 21.
10. If line 8 is greater than 0, multiply line 8 by last year's fee rate ($/ton) and enter the result here. This is the overpayment. Go to line 21.

RECONCILIATION
(WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "PRECEDING" CALENDAR YEAR)

Only complete lines 11-20 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year preceding initial fee payment; otherwise skip to line 21. If completing this section, you will also need to complete sections D and E to report actual emissions for the calendar year preceding initial fee payment.

11. Sum the actual emissions from section D (non-HAP) for the calendar year preceding initial fee payment and enter the result here.
12. Sum the actual emissions from section E (HAP) for the calendar year preceding initial fee payment and enter the result here.
13. Add lines 11 and 12 and enter the total here. These are total actual emissions for the calendar year preceding initial fee payment.
14. Enter double counted emission from line 13 here. If none, enter "0."
15. Subtract line 14 from line 13, round to the nearest ton, and enter the result here.
16. Enter the total estimated actual emissions previously reported on line 5 of the initial fee form. These are estimated actual emissions for the calendar year preceding initial fee payment.
17. If line 15 is greater than line 16, subtract line 16 from line 15, and enter the result here. Otherwise enter "0."
18. If line 16 is greater than line 15, subtract line 15 from line 16, and enter the result here. Otherwise enter "0."
19. If line 17 is greater than 0, multiply line 17 by last year's fee rate ($/ton) and enter the result here. This is the underpayment.
20. If line 18 is greater than 0, multiply line 18 by last year's fee rate ($/ton) and enter the result on this line. This is the overpayment.

EMISSION FEE CALCULATION

21. Multiply line 5 (tons) by the current fee rate ($/ton) and enter the result here. This is the unadjusted emissions fee. Continue on to line 23.	$2,482.07

GHG FEE ADJUSTMENT

22. If you are submitting an initial permit application and this is the first time you are paying fees, enter $2,236, otherwise enter "0". [Note that any updates to the initial application are covered under this one-time charge.]	0
23. Enter the number of permit modifications (or related permit actions) you have submitted to the permitting authority since you last paid fees. If none, skip to line 25.	0
24. Multiply the number in line 23 by $365 and enter the result.	0

25. If you have submitted a permit renewal application since the last time you paid fees enter $520, otherwise enter "0"	0
26. Sum line 22, 24, and 25 and enter the result. This is the GHG fee adjustment	0
OTHER ADJUSTMENTS	
27. Add the total on line 21 and the total on line 26 and enter the result.	$2,482.07
28. Enter any underpayment from line 9 or 19 here. Otherwise enter "0."	$0
29. Enter any overpayment from line 10 or 20 here. Otherwise enter "0."	$0
30. If line 28 is greater than "0," add it to line 27 and enter the result here. If line 29 is greater than "0," subtract this from line 27 and enter the result here. Otherwise enter the amount on line 27 here. This is the fee adjusted for over/underpayment.	$2,482.07
31. Enter any credit for fee assessment error here. Otherwise, enter "0."	$0
32. Subtract line 31 from line 30 and enter the result here. Stop here. This is the **TOTAL FEE (AFTER ADJUSTMENTS)** that you must remit to EPA.	$2,482.07

ATTACHMENT 2
FORM FF (FEE FILING)
CY 2018 FEE PAYMENT CHECK

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)

FEE FILING FORM (FF)

Complete this form each time you prepare form FEE and send this form to the appropriate lockbox bank address, along with full payment. This form required at time of initial fee payment, and thereafter, when paying annual fees.

Source or Facility Name Laguna Compressor Station, El Paso Natural Gas Co., L. L. C.

Source Location Cibola County, NM (within Pueblo of Laguna)

EPA Region where Source Located VI

Mailing Address:

Street/P.O. Box 7445 Pan American Freeway, Suite 202. City Albuquerque

State NM ZIP 87113 - _____

Contact Person: Richard Duarte Title Sr. EHS Engineer

Telephone (505) 831 - 7763 Ext. _____

Total Fee Payment Remitted: $ 2,482.07

Note inserted by R. Duarte: CY 2018 Emission Fees payment.

INSTRUCTIONS FOR FF (FEE FILING FORM)

Source Location: The actual location of the source: Street address (if any), City (if any), County, and State.

Mailing Address: This is the address we should use to send any correspondence concerning fee payment. This address may be different than the source location, such as a corporate office.

EPA Region: The EPA region in which the source is located (e.g., EPA Region 8)

Contact: This should be the person that can best answer questions concerning fee payment.

Payment of part 71 fees, interest and penalties may be made by check or electronic means as follows.

CHECK PAYMENT:

- Fee payment shall be in U.S. currency drawn on a U.S. bank and made out to the order of the US Environmental Protection Agency.
- Please send this form (FF) with check payment to one of the addresses below:
- Also send a photocopy of the check to the EPA regional office (or delegate agency) with form FEE.

Address for Regular Mail through U.S. Postal Service (USPS):

U.S. Environmental Protection Agency
FOIA and Miscellaneous Payments
Cincinnati Finance Center
PO Box 979078
St. Louis, MO 63197-9000

Address for Express Delivery (or When a Physical Address is Required):

FedEx 7885 6133 1526, mailed to this address on July 19, 2019.

U.S. Bank
Government Lockbox 979078
US EPA FOIA & Misc. Payments
1005 Convention Plaza
Mail Station SL-MO-C2-GL
St. Louis, MO 63101

Contact: Natalie Pearson (U.S. Bank)
314-418-4087

FOR ELECTRONIC PAYMENTS: See link below for more information on making electronic payments.

FOR MORE INFORMATION: The following links provides detailed information on how to make payments to EPA for part 71 fees, penalties, and interest, including contact information for EPA's Accounts Receivable Branch in Cincinnati (Note that more specific information concerning part 71 fees is found on the second link under "FOIA and Miscellaneous Payments."

http://www.epa.gov/ocfo/finservices/make_a_payment.htm

http://www.epa.gov/ocfo/finservices/payment_instructions.htm

Kinder Morgan Inc. as Paying Agent

No. 64286

Check Date: 06/24/2019

US ENVIRONMENTAL PROTECTION, AGENCY FOIA & MISC PAYMENTS, CINCINNATI FINANCE CENTER, PO BOX 979078, ST LOUIS MO 63197-9000 **(100038085)**

Description	Voucher #	Date	PO Number	Gross Amount	Discount Amount	Net Amount Paid
PMTREQLAGUNAFEES2018 DO NOT SEND CHECK TO VENDOR: PLEASE RETURN CHECK FEDERAL EXPRESS VIA 2-DAY TO KINDER MORGAN RICARDO DUARTE 7445 PAN AMERICAN FREEWAY, SUITE 202, ALBUQUERQUE, NM 87109	14969246	06/19/19		$2,482.07	$0.00	$2,482.07
Detach at Perforation Before Depositing Check 100038085			**Totals**	$2,482.07	$0.00	$2,482.07

KINDER MORGAN

Kinder Morgan Inc. as Paying Agent
1001 Louisiana Ste 1000
Houston, TX 77002

JP Morgan Chase Bank, N.A.
Dallas, TX
88-88/1113

Check No. 64286

Check Date
06/24/2019

Check Amount
$ **2,482.07

Two Thousand Four Hundred Eighty Two AND 07/100

PAY TO THE ORDER OF
100038085

US ENVIRONMENTAL PROTECTION
AGENCY FOIA & MISC PAYMENTS
CINCINNATI FINANCE CENTER
PO BOX 979078
ST LOUIS MO 63197-9000

K. Daug

⑈0000064286⑈ ⑆111300880⑆ 216839321⑈

ATTACHMENT 3
EMISSION CALCULATION METHODOLOGY

6548: LAGUNA

from 1/1/2018 to 12/31/2018

Emissions Inventory Tracking
Annual

Unit Description	State ID	HRS	HP-HRS	Fuel Usage	Emissions Rate (TPY)								
				(MMCF)	*NOx*	*CO*	*VOC*	*SO2*	*PM(total)*	*H2CO*	*Acetaldehyde*	*Acrolein*	*Other*
6548-A-01	6548-A-01	259.00		0.00	7.82	1.29	0.40	0.0033	0.16	0.1847	0.0260	0.0260	
6548-A-02	6548-A-02	867.75		0.00	26.21	4.13	1.28	0.0107	0.51	0.5909	0.0831	0.0833	b
6548-A-03	6548-A-03	307.50		0.00	9.29	1.88	0.58	0.0049	0.23	0.2682	0.0377	0.0378	
6548-A-Aux-01	6548-A-Aux-01	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	0.0000	
6548-A-Aux-02	6548-A-Aux-02	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.0000	0.0000	0.0000	
6548-X-Aux-01													
6548-X-Aux-02													
6548-HEATER-30					43.32		2.2692	0.0189	0.9076	1.0438	0.1467	0.1471	
Station Total		**7,151**	**23,167,649**	**184.22**	**43.32**	**0.00**	**2.2692**	**0.0189**	**0.9076**	**1.0438**	**0.1467**	**0.1471**	
					46.52	47.00	$ 52.81	Cost per ton		1.34	3.61		
							$ 2,482.07						

Max. Pot = ((Total HP-HRS/YR) / Rated HP) * HRS/YR * 100

Fuel Usage = [Total (HP-HRS/YR) * Fuel Rate (Btu(LHV)/HP-HR)]/Heat Value (Btu(LHV)/Scf) * 10^6 (Scf/MMScf)]

Non-HAP+HAP= 47.86

Season Schedule = (HP-HRS/YR) for Season/Total Annual HP-HRS) * 100

Emission Rate (TPY) = Total Annual HP-HR (HP-HR/YR) * Emission Factor (g/HP-HR) * 1/453.59 (g/lbs)] * 1/2000 (lbs/ton)

Emission Rate (lbs/hr) = Annual Emissions (TPY) * 2000 (lbs/ton) / Total Hours of Operation

Ozone Season Emissions (LBS/DAY) = Annual Emissions (TPY) * 2000 (Lbs/Ton) * 3 Month Ozone Season Hp-hrs(%) / 100 / 92 (Ozone Days/Year)

SO2 Emision Rate = Fuel Usage (mmcf/yr) * SO2 Emission Factor (lb/mmscf) / 2000

El Paso Natural Gas Company, LLC - Laguna Compressor Station

Engines

Units: A-01, A-02 & A-03
Description:

ISO Rating:	3,400	hp (site)
Fuel Heating Value:	1031	Btu/scf
Heat Input Rate:	24.58	MMBtu/hr
Fuel Consumption:	7230.0	Btu/Hp-hr

Calendar Year 2018		A-01	A-02	A-03	Totals
	Hours:	259.00	867.75	307.5	
	Fuel Cons. (MMscf):	6.49	20.76	9.43	

Criteria Pollutant	**EF**	**Units**	**Source**	**A-01 TPY**	**A-02 TPY**	**A-03 TPY**	
NOx	8.0600	gm/hp-hr	COMET;Williams	7.8238	26.2128	9.2889	43.3255
CO	0.3860	lb/MMBtu	AP-42 07/00 Tabl	1.2919	4.1319	1.8755	7.2993
VOC	0.1200	lb/MMBtu	AP-42	0.4016	1.2845	0.5831	2.2692
SO2	0.0010	lb/MMBtu	AP-42	0.0033	0.0107	0.0049	0.0189
PM	0.0480	lb/MMBtu	AP-42	0.1606	0.5138	0.2332	0.9077
HAP Pollutants							
Acetaldehyde	7.76E-03	lb/MMBtu	AP-42	0.026	0.083	0.038	0.147
Acrolein	7.78E-03	lb/MMBtu	AP-42	0.026	0.083	0.038	0.147
Benzene	1.94E-03	lb/MMBtu	AP-42	0.006	0.021	0.009	
Ethylbenzene	1.08E-04	lb/MMBtu	AP-42	0.000	0.001	0.001	
Formaldehyde	5.52E-02	lb/MMBtu	AP-42	0.185	0.591	0.268	1.044
Naphthalene	9.63E-05	lb/MMBtu	AP-42	0.000	0.001	0.000	
PAH	1.34E-04	lb/MMBtu	AP-42	0.000	0.001	0.001	
Toluene	9.63E-04	lb/MMBtu	AP-42	0.003	0.010	0.005	
Xylene	2.68E-04	lb/MMBtu	AP-42	0.001	0.003	0.001	
			Total HAPS	0.248	0.795	0.361	**1.338**
Total Mainline Engines							**46.521**
Total Aux Engines							**0.000**
Cost/ton	$52.81						$2,482.07

July 23,2019

Dear Customer:

The following is the proof-of-delivery for tracking number 788561185597.

Delivery Information:

Status:	Delivered	**Delivered to:**	Guard/Security Station
Signed for by:	H.HOLMES	**Delivery location:**	Dallas, TX
Service type:	FedEx 2Day	**Delivery date:**	Jul 23, 2019 08:53
Special Handling:	Deliver Weekday		

Signature image is available. In order to view image and detailed information, the shipper or payor account number of the shipment must be provided.

Shipping Information:

Tracking number:	788561185597	**Ship date:**	Jul 19, 2019
		Weight:	0.5 lbs/0.2 kg

Recipient:
Dallas, TX US

Shipper:
ALBUQUERQUE, NM US

Purchase order number: KM719201994451583

Thank you for choosing FedEx.

July 23,2019

Dear Customer:

The following is the proof-of-delivery for tracking number 788561331526.

Delivery Information:

Status:	Delivered	**Delivered to:**	Mailroom
Signed for by:	P.PATTERSON	**Delivery location:**	St. Louis, MO
Service type:	FedEx 2Day	**Delivery date:**	Jul 22, 2019 09:40
Special Handling:	Deliver Weekday		

Signature image is available. In order to view image and detailed information, the shipper or payor account number of the shipment must be provided.

Shipping Information:

Tracking number:	788561331526	**Ship date:**	Jul 19, 2019
		Weight:	0.5 lbs/0.2 kg

Recipient:
St. Louis, MO US

Shipper:
ALBUQUERQUE, NM US

Purchase order number: KM719201994951779

Thank you for choosing FedEx.

8. FORM I-COMP – INITIAL COMPLIANCE PLAN & COMPLIANCE CERTIFICATION

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

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

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

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

Compliance Methods for the Above (Description and Citation): There has been no physical or operational change to the significant emission units at the Laguna Compressor Station; therefore, EPNG complies with this applicable requirement.

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): A-01, A-02, A-03, AUX A-01, AUX A-02

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

Compliance Methods for the Above (Description and Citation): There has been no physical or operational change to the emission units at the Laguna Compressor Station; therefore, EPNG complies with this applicable requirement.

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): Facility Wide

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

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

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

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

Compliance Status:

_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): Facility Wide

Applicable Requirement (Description and Citation): 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 Pollution control equipment installed at this facility shall be maintained and tested per the requirements and compliance measures of 40 CFR Part 63, Subpart A and ZZZZ

3.2.2 The amount of natural gas burned in the following emission units shall not exceed the following:

Emission Unit No. A-01 – 319.5 MMscf/yr
Emission Unit No. A-02 – 319.5 MMscf/yr
Emission Unit No. A-03 – 319.5 MMscf/yr
Emission Unit No. AUX A-01 – 78.1 MMscf/yr
Emission Unit No. AUX A-02 – 78.1 MMscf/yr

3.2.3 The actual heat input for emission Unit No. A-01, Unit No. A-02, and Unit No. A-02 shall not exceed 33.26 MMBtu/hr, adjusted for elevation, and for emission Unit No. AUX A-01 and AUX-A-02 shall not exceed 8.13 MMBTU/hr adjusted for elevation.

3.2.4 Compliance Test: Compliance test 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 by applicable requirements.

3.2.5 Monitoring

3.2.5.1 Fuel consumption for Emission Units Nos. A-01, A-02, A-03, AUX A-01, and AUX A-02 shall be monitored monthly for indicidual per unit and cumulative use, per units in MMscf/yr.

3.2.5.2. Heat input rate for Unit Nos. A-01, A-02, A-03, AUX A-01 and AUX A-02 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 repair and maintenance activities performed on all emission units. These records shall identify the relevant emission unit and describe the work performed.

3.2.6.2 The fuel flow/consumption for each emission unit (Unit Nos. A-01, A-02, A-03, AUX A-03 and AUX A-02) shall be recorded on a monthly basis.

3.2.6.3 The records of fuel consumption shall be maintained for each emission unit (Unit Nos. A-01, A-02, A-03, AUX A-01, and AUX A-02.

3.2.6.4 The actual heat input rate for emission Unit Nos. A-01, A-02, A-03, AUX A-01 and AUX A-02 shall be recorded on a monthly average basis.

3.2.6.5 The records of heat input shall be maintained for emission Units Nos. A-01, A-02, A-03, AUX A-01 and AUX A-02.

3.2.7 The permitte shall keep records of the serial numbers for watch emission unit. The emission units and their serial numbers are A-01 with serial number 79007; A-02 with serial number 79008; A-03 with serial number 79005; AUX A-01 with serial number 8CPST227 and AUX A-02 with serial number 8CPST228. A change in serial number should also be reflected in the report.

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-annual by April 1 and October 1 of each year. The report due on April shall cover the prior six-month period from September 1 through the end of February. The report due on October 1 shall cover the prior six-month period from March 1 through the end of August.

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

Compliance Methods for the Above (Description and Citation):

- AUX A-01 & AUX A-02 uses non-selective catalyst; therefore, El Paso Natural Gas Company will comply with the requirements and compliance measures of 40 CFR Part 63.
- El Paso Natural Gas Company retains and updates all records and supporting information for at least five years from the date of measurement of the report. All files and records are stored at the Gallup Area Office in Gallup, NM. The files included all of the records required by this section.
- The latest MACT compliance report was submitted on July 24, 2019 [FedEx 2nd Day Service #7886 7130 1192]. Additionally, a copy was sent to the Pueblo of Laguna Environmental Director.

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): AUX A-01 and AUX A-02 only

Applicable Requirement (Description and Citation): Engine NESHAP Requirements - 4.2 Emission Limits.

4.2.1. Units AUX A-01 and AUX A-02 must comply with one of the following requirements [40 CFR 63.6600(a), Table 1a]:
4.2.1.1 Reduce formaldehyde emissions by 76 percent or more, or
4.2.1.2. Limit the concentration of formaldehyde in the stationary RICE exhaust to 350 ppb_{vd} or less at 15 percent O_2

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

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): AUX A-01 and AUX A-02 only

Applicable Requirement (Description and Citation): NESHAP Requirements: 4.3 Operational Requirements

4.3.1 If NSCR is used to meet the emission limitation then the engine must meet the following requirements [40 CFR 63.6600(a), Table 1b]:
4.3.1.1 Maintain the catalyst so that the pressure drop across the catalyst does not change by more than two inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst measured during the initial performance test; and
4.3.1.2 Maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 750 °F and less than or equal to 1250 °F.
4.3.2 Units AUX A-01 and AUX A-02 must be in compliance with the emission limitations in Condition 3.1.1 at all times, except during periods of startup, shutdown, and malfunction. [40 CFR 63.6605(a)]
4.3.3 The permittee must operate and maintain Units AUX A-01 and AUX A-02, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at all times, including during startup, shutdown, and malfunction. [40 CFR 63.6605(b)]

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

Compliance Status:

_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): AUX A-01 and AUX A-02 only

Applicable Requirement (Description and Citation): NESHAP Requirements – 4.4 Periodic Performance Testing

4.4.1 After initial performance testing subsequent performance tests to show compliance must be performed semiannually [40 CFR 63.6615, Table 3]

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

Compliance Methods for the Above (Description and Citation): Conduct subsequent performance tests to verify compliance. Latest compliance tests have been conducted and the records of the compliance test were submitted in the latest semiannual report.

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): AUX A-01 and AUX A-02 only

Applicable Requirement (Description and Citation): NESHAP Requirements – 4.5 Performance Test Method Requirements

4.5.1 The permitee must conduct each performance test in Table 3 and 4 of 40 CFR Part 63, Subpart ZZZZ that applies to the permitee [40 CFR 63.6620(a)]

4.5.2 Each performance test must be conducted according to the requirements in 40 CFR 63.7(e)(1) and under the specific conditions listed in Conditions 4.5.3 and 4.5.4. The test must be conducted at any load conditions within plus or minus 10 percent of 100 percent load. [40 CFR 63.6620(a) and (b)]

4.5.3 When conducting performance test to show compliance with the requirement to reduce formaldehyde emissions, the permittee must [40 CFR 63.6610(a), Table 4]

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

4.5.3.2 Measure O_2 at the inlet and outlet of the control device using Method 3 or 3A or 3B of 40 CFR Part 60, Appendix A. Measurements to determine O2 concentration must be made at the same time as the measurements for formaldehyde concentration.

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

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

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

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

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

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

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

4.5.5 The permittee may not conduct performance test during periods of startup, shutdown, or malfunction as specified in 40 CFR 63.7(e)(1). {40 CFR 63.6620(c)]

4.5.6 The permittee must conduct three separate test runs for each performance test required by 40 CFR 63.7(e)(3). Each test run must last at least 1 hour. [40 CFR 63.6620(d)]

4.5.7 The following equations must be used in demonstrating compliance with 40 CFR Part 63, Subpart ZZZZ [40 CFR 63.6620(e)]:

4.5.7.1 The permittee must use Equation 1 of this section to determine compliance with the percent reduction requirement:

$$\frac{C_i - C_o}{C_i} \times 100 = R \qquad \text{(Eq. 1)}$$

Where:

C_i= concentration of formaldehyde at the control device inlet

C_o = concentration of formaldehyde at the control device outlet, and

R = percent reduction of formaldehyde emissions.

4.5.7.2 The permittee must normalize the formaldehyde concentrations at the inlet and outlet of the control device to a dry basis and to 15 percent oxygen or an equivalent carbon dioxide (CO_2). If the pollutant concentrations are to be corrected to 15 percent oxygen and CO_2 concentration is measured in lieu of oxygen concentration measurement, a CO_2 correction factor is needed. Calculate the CO_2 correction factor as described in the following sections:

4.5.7.2.1 Calculate the fuel-specific F_O value for the fuel burned during the test using values obtained from Method 19, section5.2, and the following equation:

$$F_o = \frac{0.209\ F_d}{F_c} \quad (Eq.\ 2)$$

Where:

F_O = Fuel factor based on the ration of oxygen volume to the ultimate CO2 volume produced by the fuel at zero percent excess air.

0.209 = Fraction of air that is oxygen, percent /100.

F_d = Ratio of the volume of dry effluent gas to the gross calorific value of the fuel from Method 19, dsm^3/J ($dscf/10^6$ Btu).

F_C = Ratio of the volume of CO_2 produced to the gross calorific value of the fuel from Method 19, dsm^3/J ($dscf/10^6$ Btu)

4.5.7.2.2 Calculate the CO_2 correction factor for correcting measurement data to 15 percent oxygen, as follows:

$$X_{CO2} = \frac{5.9}{F_O} \quad (Eq.3)$$

Where:

X_{CO2} = CO_2 correction factor, percent.

5.9 = 20.9 percent O_2 – 15 percent O_2, that defined O_2 correction value, percent.

4.5.7.2.3 Calculate the NO_X and SO2 gas concentrations adjusted to 15 percent O_2 using CO_2 as follows:

$$C_{adj} = C_d \frac{X_{CO2}}{\%CO_2} \quad (Eq.4)$$

Where:

%CO2 = Measured CO2 concentration measured, dry basis, percent.

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

4.5.8.1 The engine model number,

4.5.8.2 The engine manufacturer,

4.5.8.3 The year of purchase,

4.5.8.4 The manufacturer's site-rated brake horsepower,

4.5.8.5 The ambient temperature, pressure,

4.5.8.6 Humidity during the performance test, and
4.5.8.7 All assumptions that were made to estimate or calculate percent load during the performance test must be clearly explained.
4.5.8.8 If measurement devices such as flow meters, kilowatt meters, beta analyzers, stain gauges, etc. are used, the modal number of the measurement device, and an estimate of its accurate in percentage of true value must be provided.

Compliance Methods for the Above (Description and Citation): Conducted performance test and CMS performance evaluation using approved methods and procedures. The latest performance tests were submitted with the semiannual monitoring reports.

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): Engine MACT Requirements: AUX A-01 and AUX A-02 only

Applicable Requirement (Description and Citation): NEHSAP Requirements – 4.6 Monitoring, Installation, Operation, And Maintenance Requirements

4.6.1 The permittee must install, operate, and maintain each CPMS according to the requirements in 40 CFR 63.8. [40 CFR 63.6625(b)]
4.6.2 For engines complying with the requirement to reduce formaldehyde emissions and using NSCR, the following requirements apply [40 CFR 63.6625(b) Table 5]:
4.6.2.1 The average reduction of emissions of formaldehyde determined from the initial performance test must be equal to or greater than the required formaldehyde percent reduction; and
4.6.2.2 The permittee must install a CPMS to continuously monitor catalyst inlet temperature according to the requirements in § 63.6625(b); and
4.6.2.3 The permittee must maintain records of the catalyst pressure drop and catalyst inlet temperature recorded during the initial performance test.
4.6.3 For engines complying with the requirement to limit the concentration of formaldehyde in the stationary RICE exhaust and using oxidation catalyst or NSCR, the following requirements apply [40 CFR 63.6625(b), Table 5]
4.6.3.1 The average formaldehyde concentration, corrected to 15 percent O2, dry basis, from the three test runs must be less than or equal to the formaldehyde emission limitation; and
4.6.3.2 The permittee must install a CPMS to continuously monitor catalyst inlet temperature according to the requirements in 40 CFR 63.6625(b); and
4.6.3.3 The permittee must maintain records of the catalyst pressure drop and catalyst inlet temperature recorded during the initial performance test.

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

Compliance Status:

_**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): Engine MACT Requirements: AUX A-01 and AUX A-02 only

Applicable Requirement (Description and Citation): NESHAP Requirements – 4.7 Continuous Compliance Requirements

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

4.7.1.1 Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must monitor continuously at all times that the stationary RICE is operating. [40 CFR 63.6635(b)]

4.7.1.2 The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods. [40 CFR 63.6635(c)]

4.7.2 The permittee must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b and Tables 2a and 2b of 40 CFR 63 Subpart ZZZZ that apply to the permittee (conditions immediately following). [40 CFR 63.6640(a)]

4.7.3 For each engine complying with the requirement to reduce formaldehyde emissions and using NSCR, the permittee must demonstrate continuous compliance by [40 CFR 63.6640(a), Table 6]:

4.7.3.1 Collecting the catalyst inlet temperature data according to 40 CFR 63.6625(b);

4.7.3.2 Reducing these data to 4-hour rolling averages;

4.7.3.3 Maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and

4.7.3.4. Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.

4.7.4 For each engine complying with the requirement to limit the concentration of formaldehyde in the exhaust and using oxidation catalyst or NSCR, the permittee must demonstrate continuous compliance by [40 CFR 63.6640(a), Table 6]:

4.7.4.1 Conducting semiannual performance tests for formaldehyde to demonstrate that the permittee's emissions remain at or below the formaldehyde concentration limit;

4.7.4.2 Collecting the catalyst inlet temperature data according to 40 CFR 63.6625(b);

4.7.4.3 Reducing these data to 4-hour rolling averages;

4.7.4.4 Maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and

4.7.4.5 Measuring the pressure drop across the catalyst once per month and demonstrating that the pressure drop across the catalyst is within the operating limitation established during the performance test.

4.7.5 For semiannual testing (3 conditions above), after the permittee has demonstrated compliance for two consecutive tests, the permittee may reduce the frequency of subsequent performance tests to annually. If the results of any subsequent annual performance test indicate the stationary RICE is not in compliance with the formaldehyde emission limitation, or the permittee deviates from any of the permittee's operating limitations, the permittee must resume semiannual performance tests. [40 CFR 63.6640(a), Table 6, Note 1]

4.7.6 The permittee must report each instance in which the permittee did not meet each emission limitation or operating limitation in Tables 1a and 1b and Tables 2a and 2b of 40 CFR 63 Subpart ZZZZ that apply to the permittee. These instances are deviations from the emission and operating limitations in 40 CFR 63 Subpart ZZZZ. These deviations must be reported according to the requirements in §63.6650. If the permittee changes the catalyst, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the permittee reestablishes the values of the operating parameters, the permittee must also conduct a performance test to demonstrate that the permittee is meeting the required emission limitation applicable to the permittee's stationary RICE. [40 CFR 63.6640(b)]

4.7.7 During periods of startup, shutdown, and malfunction, the permittee must operate in accordance with the permittee's startup, shutdown, and malfunction plan. [40 CFR 63.6640(c)]

4.7.8 Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations from the emission or operating limitations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to the USEPA Administrator's satisfaction that the permittee was operating in accordance with the startup, shutdown, and malfunction plan. For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR 94.11(a). [40 CFR 63.6640(d)]

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

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

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

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

Compliance Status:

_**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): Engine MACT Requirements: AUX A-01 and AUX A-02 only

Applicable Requirement (Description and Citation): NESHAP Requirements – 4.8 Reporting Requirements

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

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

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

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

4.8.4.1 If there are no deviations from any emission limitations or operating limitations that apply to the permittee, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out- of-control, as specified in 40 CFR § 63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; or

4.8.4.2 If there are no deviations from any emission limitations or operating limitations that apply to the permittee, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out- of-control, as specified in 40 CFR § 63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; or

4.8.4.3 I If the permittee had a startup, shutdown or malfunction during the reporting period, the information in 40 CFR § 63.10(d)(5)(i).

4.8.5 The permittee must submit an immediate startup, shutdown, and malfunction report if actions addressing the startup, shutdown, or malfunction were inconsistent with the permittee's startup, shutdown, or malfunction plan during the reporting period. The reporting must be consistent with the following requirements [40 CFR 63.6650(a), Table 7]:

4.8.5.1 Actions taken for the event must be submitted by fax or telephone within 2 working days after starting actions inconsistent with the plan.

4.8.5.2 The information in 40 CFR 63.10(d)(5)(ii) must be submitted by letter within 7 working days after the end of the event unless the permittee has made alternative arrangements with the permitting authorities. (40 CFR 63.10(d)(5)(ii))

4.8.6 Annually, according to the requirements in 40 CFR 63.6650, the permittee must report [40 CFR 63.6650(a), Table 7]:

4.8.6.1 The fuel flow rate of each fuel and the heating values that were used in the permittee's calculations, and the permittee must demonstrate that the percentage of heat input provided by landfill gas or digester gas, is equivalent to 10 percent or more of the gross heat input on an annual basis; and

4.8.6.2 The operating limits provided in the permittee's federally enforceable permit, and any deviations from these limits; and

4.8.6.3 Any problems errors suspected with the meters.

4.8.7 Unless the Administrator has approved a different schedule for submission of reports under 40 CFR §63.10(a), the permittee must submit each report by the date listed in Conditions 3.9.7 through 3.9.9 and according to the following requirements [40 CFR 63.6650(b)]:

4.8.7.1 The first Compliance report must cover the period beginning on the compliance date that is specified for the permittee's affected source in 40 CFR §63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for the permittee's source in 40 CFR §63.6595.

4.8.7.2 The first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the permittee's affected source in 40 CFR §63.6595.

4.8.7.3 Each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

4.8.7.4 Each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

4.8.7.5 For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), the permittee may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates previously specified.

4.8.8 The Compliance report must contain the following information [40 CFR 63.6650(c)]:

4.8.8.1 Company name and address.

4.8.8.2 The first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the permittee's affected source in 40 CFR §63.6595.

4.8.8.3 Date of report and beginning and ending dates of the reporting period..

4.8.8.4 If the permittee had a startup, shutdown, or malfunction during the reporting period, the compliance report must include the information in 40 CFR §63.10(d)(5)(i). .

4.8.8.5 If there are no deviations from any emission or operating limitations that apply to the permittee, a statement that there were no deviations from the emission or operating limitations during the reporting period.

4.8.8.6 If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control, as specified in 40 CFR §63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.

4.8.9 For each deviation from an emission or operating limitation that occurs for a stationary RICE where the permittee is not using a CMS to comply with the emission or operating limitations in Section 3 of this permit, the Compliance report must contain the information in the appropriate conditions [40 CFR 63.6650(d)]:)]:

4.8.9.1 The total operating time of the stationary RICE at which the deviation occurred during the reporting period.

4.8.9.2 Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

4.8.10 For each deviation from an emission or operating limitation occurring for a stationary RICE where the permittee is using a CMS to comply with the emission and operating limitations in Section 3 of this permit, the permittee must include information in the appropriate conditions [40 CFR 63.6650(e)]:

4.8.10.1 The date and time that each malfunction started and stopped.

4.8.10.2 The date, time, and duration that each CMS was inoperative, except for zero (low-level) and high-level checks.

4.8.10.3 The date, time, and duration that each CMS was out-of-control, including the information in 40 CFR §63.8(c)(8).

4.8.10.4 The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period..

4.8.10.5 A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.

4.8.10.6 A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.

4.8.10.7 A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period.

4.8.10.8 A brief description of the stationary RICE.

4.8.10.9 A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.

4.8.10.10 A brief description of the CMS.

4.8.10.11 The date of the latest CMS certification or audit.

4.8.10.12 A description of any changes in CMS, processes, or controls since the last reporting period.

4.8.11 Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in Condition III in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of 40 CFR 63 Subpart ZZZZ along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Section 3 of this permit, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. [40 CFR 63.6650(f)]

Compliance Methods for the Above (Description and Citation):

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

Submit Compliance Report.

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

Compliance Status:

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): Engine MACT Requirements: AUX A-01 and AUX A-02

Applicable Requirement (Description and Citation): NESHAP Requirements – 4.9 Recordkeeping Requirements

- 4.10.1 If the permittee must comply with the emission and operating limitations, the permittee must keep the records described in the appropriate conditons of this section. [40 CFR 63.6655(a)]
  - 4.10.1.1 A copy of each notification and report that the permittee submitted to comply with Section 3 of this permit, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in 40 CFR §63.10(b)(2)(xiv).
  - 4.10.1.2 The records in 40 CFR §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.
  - 4.10.1.3 Records of performance tests and performance evaluations as required in 40 CFR §63.10(b)(2)(viii).
- 4.10.2 For each CEMS or CPMS, the permittee must keep the records of the following information; [40 CFR 63.6655(b)]
  - 4.10.2.1 Records described in 40 CFR §63.10(b)(2)(vi) through (xi).
  - 4.10.2.2 Previous (i.e., superseded) versions of the performance evaluation plan as required in 40 CFR §63.8(d)(3).
  - 4.10.2.3 Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in 40 CFR §63.8(f)(6)(i), if applicable.
- 4.10.3 The permittee must keep the records required in Table 6 of 40 CFR 63 Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to the permittee. [40 CFR 63.6655(d)]
- 4.10.4 The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1). [40 CFR 63.6660(a)]

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

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

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

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

Compliance Status:

_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): Facility Wide

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

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

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

Compliance Status:

_**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): Facility Wide

Applicable Requirement (Description and Citation): 5. Title V Administrative Requirements
5.1. Annual Fee Payment [40 CFR §§ 71.6(a)(7) and 71.9]
5.1.1 The permittee shall pay an annual permit fee in accordance with the procedures outlined below.
5.1.2 The permittee shall pay the annual permit fee each year:
The fee shall be received no later than July 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:
EPA Region 6
P.O. Box 360582M
Pittsburgh, PA 15251

Compliance Methods for the Above (Description and Citation):
The 2018 fee was submitted on 07/19/2019 in the amount of $2,482.07 (check #64286).

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): Facility Wide

Applicable Requirement (Description and Citation): Title V Administrative Requirements – 5.1 Annual Fee Payment [40 CFR §§ 71.6(a)(7) and 71.9]
5.1.5. The permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in Section 5.5. of this permit.
5.1.6. Basis for calculating annual fee:
5.1.6.1. The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the emissions fee (in dollars/ton) in effect at the time of calculation.
5.1.6.1.1. “Actual emissions" means the actual rate of emissions in tons per year of any regulated pollutant (for fee calculation) emitted from a part 71 source over the preceding calendar year. Actual emissions shall be calculated

using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.

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

5.1.6.1.3. The term "regulated pollutant (for fee calculation) is defined in § 71.2.

5.1.6.1.4. The permittee should note that the presumptive fee amount is revised each calendar year to account for inflation, and it is available from EPA prior to the start of each calendar year.

5.1.6.2. The permittee shall exclude the following emissions from the calculation of fees:

5.1.6.2.1. The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tons per year.

5.1.6.2.2. Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation.

5.1.6.2.3. The insignificant quantities of actual emissions not required to be listed or calculated in a permit application pursuant to § 71.5(c)(11).

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

5.1.8. The permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee for five years following submittal of fee payment. Emission-related data include, for example, emissions-related forms provided by EPA and used by the permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with § 71.6(a)(3)(ii),.

5.1.9. Failure of the permittee to pay fees in a timely manner shall subject the permittee to assessment of penalties and interest in accordance with § 71.9(1).

5.1.10. The EPA will not act on applications for permit renewal or modification if the permittee fails to pay all fees, interest, and penalties owed in full.

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

5.1.12. If the permittee thinks that the EPA-assessed fee is in error and wishes to challenge the fee, the permittee shall provide written explanation of the alleged error to EPA along with full payment of the assessed fee.

Compliance Methods for the Above (Description and Citation): The calculation form was submitted to EPA on 07/19/2019. There were no notices for underpayment sent by the USEPA Region 6 during this time period.

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): Facility Wide

Applicable Requirement (Description and Citation): Title V Administrative Requirements – 5.2 Blanket Compliance Statement [40 CFR §§ 71.6(a)(6)(i) and (ii)]

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

5.2.2. Determinations of deviations, continuous or intermittent compliance status, or violations of this permit, are not limited to the applicable testing or monitoring methods required by the underlying regulations of this permit; other credible evidence must be considered in such determinations.

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

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): Facility Wide

Applicable Requirement (Description Citation): Title V Administrative Requirements – 5.3 Compliance Certifications [40 CFR § 71.6(c)(5)]

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

5.3.1. The certification shall include the following:

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

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

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

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

Compliance Methods for the Above (Description and Citation): The latest ACC and Semiannual reports were submitted on 03/29/2019. The latest NESHAP Compliance report was submitted on 7/24/2019 as required under 63.650(b)(3).

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): Facility Wide

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

The permittee shall furnish to EPA, within a time specified by EPA, any information that EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential should be accompanied by a claim of confidentiality according to the provisions of 40 CFR part 2, Subpart B. The permittee, upon becoming aware that any relevant facts were omitted or that incorrect information was submitted in the permit application, shall promptly submit such supplemental facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after this permit is issued.

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

Compliance Status:

_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): Facility Wide

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

U.S. EPA, Region 6
Air Enforcement Section,
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:

U.S EPA, Region 6
Air Permits Section,
Mailcode 6PD-R
1445 Ross Avenue
Dallas, TX 75202-2733

Compliance Methods for the Above (Description and Citation): All documents that required certification were certified by the responsible official as to truth, accuracy, and completeness.

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): Facility Wide

Applicable Requirement (Description and Citation): Title V Administrative Requirements – 5.6. Severability Clause [40 CFR § 71.6(a)(5)]

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

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

Compliance Status:

_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): Facility Wide

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

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

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

Compliance Status:

_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): Facility Wide

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

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

5.8.1. Corrects typographical errors;
5.8.2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
5.8.3. Requires more frequent monitoring or reporting by the permittee:
5.8.4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the EPA;

5.8.5. Incorporates into the part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of sections 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained 71.6; and

5.8.6. Incorporates any other type of change which EPA has determined to be similar to those listed above in subparagraphs 5.8.1. through 5.8.5 above.

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

Compliance Status:

_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): Facility Wide

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

5.9.1. The permittee may request the use of minor permit modification procedures only for those modifications that:

5.9.1.1. Do not violate any applicable requirement;

5.9.1.2. Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

5.9.1.3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

5.9.1.4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

5.9.1.4.1. A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I; and

5.9.1.4.2. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the CAA;

5.9.1.5. Are not modifications under any provision of title I of the CAA; and

5.9.1.6. Are not required to be processed as a significant modification.

5.9.2. Notwithstanding the list of changes eligible for minor permit modification procedures in paragraph 5.9.1. above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by EPA.

5.9.3. An application requesting the use of minor permit modification procedures shall meet the requirements of § 71.5(c) and shall include the following:

5.9.3.1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
5.9.3.2. The source's suggested draft permit;
5.9.3.3. Certification by a responsible official, consistent with § 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
5.9.3.4. Completed forms for the permitting authority to use to notify affected States as required under § 71.8.

5.9.4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until EPA takes any of the actions authorized by § 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5.9.5. The permit's shield under § 71.6(f) may not extend to minor permit modifications.

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

Compliance Status:

_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): Facility Wide

Applicable Requirement (Description and Citation): Title V Administrative Requirements – 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:
5.10.11. That meet the criteria for minor permit modification procedures under paragraphs 5.9.1. of this permit; and
5.10.1.2. That collectively are below the threshold level of 10 percent of the emissions allowed by the permit for the emissions unit for which the change is requested, 20 percent of the applicable definition of major source in § 71.2, or five tons per year, whichever is least.

5.10.2. An application requesting the use of group processing procedures shall be submitted to EPA, shall meet the requirements of sections 71.5(c), and shall include the following:
5.10.2.1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
5.10.2.2. The source's suggested draft permit.

5.10.2.3. Certification by a responsible official, consistent with § 71.5(d), that the proposed modification meets the criteria for use of group processing procedures and a request that such procedures be used.

5.10.2.4. A list of the source's other pending applications awaiting group processing, and a determination of whether the requested modification, aggregated with these other applications, equals or exceeds the threshold set under subparagraph 5.10.1.2. above.

5.10.2.5. Completed forms for the permitting authority to use to notify affected States as required under § 71.8.

5.10.3. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by § 71.1(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5.10.4. The permit shield under § 71.6(f) may not extend to group processing of minor permit modifications.

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

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): Facility Wide

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

5.11.1. The permittee must request the use of significant permit modification procedures for those modifications that:

5.11.1.1. Do not qualify as minor permit modifications or as administrative amendments.

5.11.1.2. Are significant changes in existing monitoring permit terms or conditions.

5.11.1.3. Are relaxations of reporting or recordkeeping permit terms or conditions.

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

5.11.3. Permittees must meet all requirements of part 71 including those for applications, public participation, and review by affected States as they apply to permit issuance and permit renewal. For the application to be determined complete, the permittee must supply all information that is required by § 71.5 (c) for permit issuance and renewal, but only that information that is related to the proposed change.

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

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): Facility Wide

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

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

5.12.1. Additional applicable requirements under the CAA become applicable to a major part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to § 71.7(c)(3).

5.12.2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offsets plans shall be deemed to be incorporated into the permit.

5.12.3. The EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

5.12.4. The EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

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

Compliance Status:

_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): Facility Wide

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

Compliance Methods for the Above (Description and Citation): This applicable requirement does not impose any action by EPNG.

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): Facility Wide

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

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

5.14.1. Enter upon the permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
5.14.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
5.14.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit: and
5.14.4. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements

Compliance Methods for the Above (Description and Citation): EPNG has followed the requirement of this condition anytime an EPA representative or an authorized representative has requested any of the above actions.

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): Facility Wide

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

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

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): Facility Wide

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

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

5.16.1. Each change is not addressed or prohibited by this permit;
5.16.2. Each change shall comply with all applicable requirements and may not violate any existing permit term or condition;
5.16.3. Changes under this provision may not include changes or activities subject to any requirement under Title IV or that are modifications under any provision of Title I of the CAA;
5.16.4. The permittee shall provide contemporaneous written notice to EPA of each change, except for changes that qualify as insignificant activities under § 71.5 (c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;
5.16.5. The permit shield does not apply to changes made under this provision;
5.16.6. The permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes.

Compliance Methods for the Above (Description and Citation): There were no off-permit changes reported or conducted neither during the previous 5 years nor during this reporting period.

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): Facility Wide

Applicable Requirement (Description and Citation): Title V Administrative Requirements – 5.17. Permit Expiration and Renewal [40 CFR §§ 71.5 (a)(1)(iii), 71.6(a)(11), 71.7(b), 71.7(c)(1)(i) and (ii), 71.8(d)]

5.17.1. This permit shall expire upon the earlier occurrence of the following events:
5.17 1.1. Five years elapses from the date of issuance; or
5.17.1.2. The source is issued a pan 70 permit by an EPA-approved permitting authority.
5.17.2. Expiration of this permit terminates the permittee's right to operate unless a timely and complete permit renewal application has been submitted at least six months, but not more than 18 months, prior t& the expiration of this permit.
5.17.3. If the permittee submits a timely and complete permit application for renewal, consistent with § 71.5(a)(2), but the permitting authority has failed to issue or deny the renewal permit, then the permit shall not expire until the renewal permit has been issued or denied and any permit shield granted pursuant to section 71.6(f) may extend beyond the original permit term until renewal.
5.17.4. The permittee's failure to have a Part 71 permit, where timely and complete application for renewal was submitted, is not a violation of this part until EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by EPA.
5.17.5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation and affected State and tribal review.
5.17.6. The application for renewal shall include the current permit number, description of permit revisions and off-permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

Compliance Methods for the Above (Description and Citation): The permit expires on March 18, 2020; therefore, an application is due between 9/18/2018 and 9/18/2019. EPNG is currently preparing an application for this facility.

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 04/01/2020

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: **X** In Compliance ____ Not In Compliance

Compliance Certification Requirements: **X** In Compliance ____ Not In Compliance

INSTRUCTIONS FOR I-COMP

INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

Section A (Compliance Status and Compliance Plan)

Description of Applicable Requirement: Complete Section A for each unique combination of applicable requirements (emission limitations, standards or other similar requirements of federal rules, SIP, TIP, FIP, or federally-enforceable permits) that apply to particular emissions units. You will likely have to complete this section numerous times to include all requirements at all emission units.

The emissions unit ID(s) should be the ones defined in section I of form GIS. If the requirement, including compliance method, applies in the same way to multiple emission units, you may list multiple units for a particular requirement.

The descriptions here should be detailed to the individual requirement level, rather than the standard level (if a MACT applies to you, describe each requirement of the MACT, rather than just a citation to the MACT as a whole). If the requirement imposes a particular numerical limit or range, include that in your description.

Citations to the requirements should unambiguously identify the requirement to the lowest level necessary.

Compliance Methods: List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Such methods may be required by the applicable requirements or performed for other reasons. List all compliance methods required by applicable requirements, whether you used them to determine compliance or not.

To describe monitoring, indicate the monitoring device, the equipment, process, or pollutant monitored, averaging time, frequency, and a citation or cross-reference to the requirement. To describe recordkeeping, describe the records kept, the frequency of collection, and include a citation or cross-reference to the requirement. Please indicate whether monitoring data, results, or other records kept for compliance purposes may be kept on-site rather than reported. To describe reporting requirements, describe what is reported, when it is reported, and cite or cross-reference the requirement.

The citation or cross-reference here must unambiguously identify the requirement to the lowest level necessary.

Note that Compliance Assurance Monitoring (CAM) under part 64 is also an applicable requirement that may impose compliance methods for title V sources and require the submittal of a CAM plan with this application. Also note that periodic monitoring (which may be monitoring or recordkeeping designed to serve as monitoring) under part 71 may be required in certain limited circumstances: when there is no monitoring required, monitoring is required but there is no frequency specified, or only a one-time test is required. You may propose periodic monitoring in your application, but the permitting authority will make the final decision. If you wish to propose periodic monitoring, please do so in an attachment that clearly identifies the requirements, the units they apply to, and what you propose for periodic monitoring.

Compliance Status: For each requirement and associated compliance methods described above, indicate whether you are in compliance, not in compliance, or it is a future-effective requirement (only check one). This is with respect to your compliance status at the time of application submittal. You should consider all available information or knowledge that you have when evaluating your compliance status, including reference test methods and other compliance requirements that are required directly by a statute, regulation, or permit and “credible evidence” (e.g., non-reference test methods and other information “readily available” to you and already being utilized by you). For each compliance status indication, you must answer “YES” or “NO” as to your expectations for continuing (or future) compliance. If you answer “NO” to any of these questions, you will have to complete the schedule of compliance section (section B).

Section B (Schedule of Compliance)

Complete this section if you answered "NO" to any of the questions in section A. Regardless of how you answered the questions in section A, complete this section if required to have a schedule of compliance by an applicable requirement, or if a judicial consent decree or administrative order includes a schedule of compliance.

Identify the applicable requirement using the same information you used in section A. Provide a brief explanation of the reason for noncompliance (either now or in the future). [e.g., "do not have control device required as BACT."] Next, provide a brief description of what the schedule of compliance is trying to achieve. Then in the table provided, include a detailed schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the applicable requirement. This schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance must be supplemental to, and not sanction noncompliance with, the applicable requirements on which it is based. For each remedial measure, provide the date by which the action will be completed. This schedule or one approved by the permitting authority will be included in the permit.

Lastly, attach a copy of any judicial consent decrees or administrative orders for which you are providing a schedule of compliance.

Section C (Schedule for Submission of Progress Reports)

If you must submit one or more schedules of compliance (specified in section B), or if an applicable requirement requires submittal of a progress report, complete this section. Progress reports describe your progress in meeting the milestone dates for the remedial measures required by the schedule of compliance. Progress reports must be submitted at least every 6 months, but specific applicable requirements may require them more frequently. One progress report may include information on one or more schedules of compliance. Describe the contents of the progress report, including the date that your facility will begin submitting them and the frequency they will be submitted.

Section D (Schedule for Submission of Compliance Certifications)

All applicants must complete this section. Compliance certifications must be submitted at least every year unless the applicable requirement or EPA requires them more frequently. Provide the date when the first compliance certification will be sent.

Section E (Compliance Status for Enhanced Monitoring and Compliance Certification)

All applicants must complete this section. The completion of this section does not satisfy the requirement for the responsible official to submit a certification of truth, accuracy, and completeness (instead, this is met by completing form CTAC and submitting it with the other forms you send to EPA).

To certify compliance with "Enhanced Monitoring," you must be in compliance at all emission units with CAM and "Periodic Monitoring" [required by 40 CFR 71.6(a)(3)(i)(B)], if they apply. "Compliance Certification Requirements" include requirements for compliance certification in title V applications and permits, and possibly through applicable requirements (e.g., certain MACT standards). If you have fully completed sections A - E of this form, you will be in compliance with the compliance certification requirement for applications. If you do not have a title V permit at this time, you can assume you are in compliance with the compliance certification requirements for permits and with periodic monitoring requirements. If you indicate you are "not in compliance" with either of these requirements, attach an explanation.

END

Applicable Requirements

40 CFR 50 – National Ambient Air Quality Standards
This regulation defines national ambient air quality standards. The facility meets all applicable national ambient air quality standards for NO_x, CO, SO_2, H_2S, PM_{10}, and $PM_{2.5}$ under this regulation.

40 CFR 71 – Federal Operating Permits
This facility is a major source of VOC emissions as defined by 40 CFR 71 and is operated in accordance with Permit R6NM-02-09-R1.

MACT 40 CFR 63 Subpart ZZZZ
This regulation defines national emission standards for HAPs for stationary reciprocating Internal Combustion Engines. AUX A-01 and AUX A-02 are subject to this regulation; however, units A-01, A-02, & A-03 have no applicable requirements due to manufacture date and engine type.

The following discussion addresses applicable requirements and requirements that may appear to be applicable but are not.

Non-Applicable Requirements

40 CFR 60 Subparts Da and Db – Standards of Performance for Steam Generating Units
This regulation establishes standards of performance for steam generating units. This regulation does not apply because this facility does not operate any steam generating units.

40 CFR 60 Subparts K, Ka, and Kb - Standards of Performance for Storage Vessels
This regulation establishes performance standards for storage vessels for petroleum liquids and volatile organic liquids. The facility does not have any tanks with storage capacities equal to or greater than 75 cubic meters used to store volatile organic liquids.

40 CFR 60 Subpart GG - Standards of Performance for Stationary Gas Turbines
This regulation establishes standards of performance for certain stationary gas turbines. This regulation does not apply because this facility does not operate any turbines

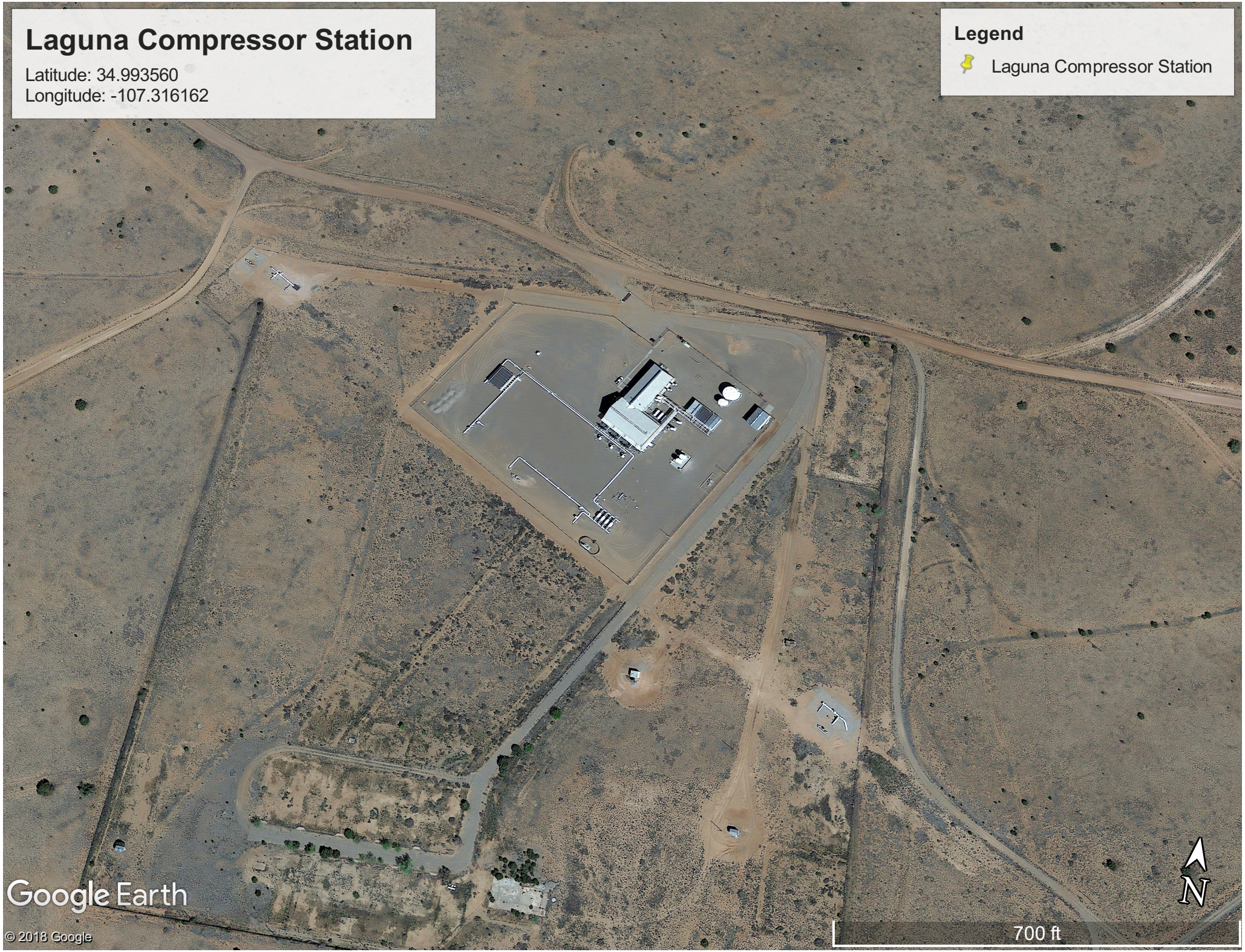
40 CFR 60 Subpart LLL – Standards of Performance for Onshore Natural Gas Processing: SO_2 Emissions
This regulation establishes standards of performance for SO_2 emissions from onshore natural gas processing for which construction, reconstruction, or modification of the amine sweetening unit commenced after January 20, 1984 and on or before August 23, 2011. The regulation does not apply as this facility is not a natural gas processing plant.

40 CFR 60 Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production
This regulation establishes standards of performance for crude oil and natural gas production, transmission and distribution. The facility does not have any affected units that have been modified or reconstructed on or after August 23, 2011.

40 CFR 60 Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015
This subpart establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC), greenhouse gases (GHG) and sulfur dioxide (SO2) emissions from affected facilities in the crude oil and natural gas source category that commence construction, modification or reconstruction after September 18, 2015. The effective date of the rule is August 2, 2016. The facility does not have any affected units that have been modified or reconstructed on or after September 19, 2015.

40 CFR 60 Subpart JJJJ - Standards of Performance for Natural Gas Fired Engines
This regulation establishes standards of performance for natural gas-fired engines. The Clark TLA-10 engines (A-01 through A-03) located at this facility were installed at this facility in 1958; therefore, they are not subject to this subpart.

10. FACILITY AREA MAP


Laguna Compressor Station
Latitude: 34.993560
Longitude: -107.316162
Legend
Laguna Compressor Station
Google Earth
© 2018 Google
N
700 ft

11. FORM CTAC – CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

United States Environmental Protection Agency

OMB No. 2060-0336,
Approval Expires 05/31/2019

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) **Baca** (First) **Philip** (MI) **L.**

Title **Operations Division Director**

Street or P.O. Box **5151 East Broadway, Suite 1680**

City **Tucson** State **AZ** ZIP **85711** -

Telephone (**505**) **520** - **4224** Ext. Facsimile (**505**) **520** - **4328**

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) Philip W Baca

Name (typed) **Philip L. Baca** Date: 8/22/19

Note added by R. Duarte: This EPA Form 5900-02 was completed for Laguna Compressor Station's Title V Renewal application to be submitted in early September 2019.