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

December 24, 2014
STATEMENT OF BASIS

For draft Air Pollution Control Title V Permit to Operate for Permit Renewal No. R6NM-02-09R1 (replaces R6FOPP71-02).

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

The applicant is: El Paso Natural Gas Company, LLC
2 North Nevada Avenue
Colorado Springs, Colorado 80903

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

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

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

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

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

a. Remove Section 4 entitled "Additional Requirements to be Implemented in Future Activities under the Permit" from the November 17, 2003 Title V permit. The Title V permit does not authorize construction activities. Any future construction activities will be handled under a separate permitting action and any consultation requirements under the

Endangered Species Act and National Historic Preservation Act will be addressed at that time.

b. Include 40 CFR Part 63, Subparts A and ZZZZ applicability and requirements to the Ingersol Rand engines, Units No. Aux A-01 and Aux A-02. 40 CFR Part 63 Subpart ZZZZ was promulgated on June 15, 2004, and these two engines are subject to these requirements under the applicability criteria of the rule.

c. Include Potential to Emit emissions for Particulate Matter less than 2.5 micrograms per cubic meter.

d. Adjust facility-wide source Potential to Emit (PTE) to increase SO_2 emissions to 7.0 tpy, increase PM_{10} emissions to 22.4 tpy, include $PM_{2.5}$ emissions at 22.4 tpy, and increase HAPs to 36 tpy (see Table 2 for exact changes) to finish updating changes from previous application and permitting actions, to reflect more accurate estimates of PTEs. Revise individual unit PTEs accordingly. Precursors for $PM_{2.5}$, including NOx, SO_2, and VOC are monitored.

e. Include individual fuel use metering monitoring requirements on both Ingersol Rand IC engines, Units Aux A-01 and Aux A-02.

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

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

3. The Laguna Pueblo Tribe:

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

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

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

c. Current Leadership: Honorable Richard B. Liarkie. Governor
Harry A. Antonio, Jr.1st Lieutenant Governor
Kenneth J. Tiller, 2nd Lieutenant Governor

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

e. Environmental Office: Adam M. Ringia (Environmental and Natural Resources Director
Chemanji Shu.Nyamboli (Environmental Program Manager)
Colleen Garcia (Environmental Specialist)
Cherilyn Atcitty, (Environmental Technician);
Dorothy Beecher (Air Quality Specialist)

Phone: 505-552-7534 Fax: 505-552-6857

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

The nearest community, Laguna Subdivision, is located ½ mile North from the Transwestern Pipeline Company's Compressor Station No. 6, and the El Paso Natural Gas Company's Laguna Compressor Station is located 4.5 miles southeast

of Transwestern Pipeline Company's Compressor Station No.6. The Old Laguna Village is situated about five miles Northeast from the El Paso Natural Gas Company's Laguna Compressor Station. Prevailing winds are blowing from West/Southwest directions toward both communities.

4. Facility Information:

a. Location: The El Paso Natural Gas Company, Laguna Compressor Station is located 5 miles southeast of Laguna, New Mexico in Cibola County, Latitude: 34° 59' 42"; Longitude: 107° 18' 51".

The mailing address is:

El Paso Natural Gas Company
8725 Alameda Park Drive, N.E.
Albuquerque, NM 87133

b. Facility Contact/ Responsible Official

The facility contact and responsible official is Philip L. Baca [(520) 663-7113], and the plant manager/facility contact is Richard Duarte [(505) 831-7763].

c. Description of Operations and Products

El Paso Natural Gas Company, LLC, with Standard Industrial Classification code 4922, is a natural gas compression and transmission facility with pressurized natural gas as its principal product. The facility receives natural gas through an inlet line which passes through an inlet separator. The inlet gas is then compressed by one of three engine driven gas compressors. After compression, the natural gas exits the facility. The compressor engines are Clark TLA-10 engines rated at 3,400-Horse Power (hp). These units were installed in 1958. These units have the following serial numbers: A-01 with serial number 79007; A-02 with serial number 79008; A-03 with serial number 79005. The Ingersoll-Rand PSVG-8 auxiliary units are rated at 544-hp are a gas-fired engine driven generators which provides electric power to the station. The serial numbers for these emission units are 8CPST227 for AUX A-01 and 8CPST228 for AUX A-02. It is expected that the source keep records of the serial numbers, and any change in serial number for each emission unit should be reflected in the report.

The facility was initially constructed in 1958 and has not been modified since 1970, the enactment of the CAA. Products of combustion from the compressor and generator engines exhaust through independent stacks.

d. Permitting and/or Construction History:

The Laguna Compressor Station is owned and operated by El Paso Natural Gas Company, LLC, which commenced operations in 1958. The EPA has no record of any Federal permitting activity at this facility.

A permit application dated September 30, 1999, was received requesting a Part 71 Operating Permit. Additional information dated December 22, 1999, and March 14, 2001, were also submitted. The initial Title V permit was public noticed, and challenged by the Company for failure to provide a draft to the company, plus notation of errors made in the original application submitted. The permit, with negotiated changes, was issued by EPA in 2003, with an effective date of March 19, 2003. An update to the application was submitted on July 17, 2003, with an additional challenge to the validity of the conditions of the permit for cause. The permit was reopened and modified per updated information on March 19, 2004.

A permit application dated September 11, 2008, was received requesting a Part 71 Operating Permit renewal, with supporting documentation received on October 31, 2008. Application was deemed administratively complete on November 6, 2008. Additional requested information to supplement the permit renewal application has been submitted to EPA on the following dates: October 31, 2008; April 30, 2009,; May 8, 2009; June 30, 2009; July 9 and 16, 2009; , and December 19, 2012, and March 28 and May 30, 2013.

e. Potential to Emit -

Table 1 includes the potential to emit data provided by El Paso Natural Gas Company, LLC. Potential to emit means the maximum capacity of El Paso Natural Gas Company, LLC, Laguna Compressor Station to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of El Paso Natural Gas Company, LLC to emit an air pollutant, including air pollution control equipment and restrictions on hours of operations or on the type or amount of material combusted, stored, or processed, may be treated as part of its design if the limitation is enforceable by EPA. Potential to Emit is not meant to be a worst case single emission calculation alone, but to represent the maximum operating range of the source units at design specifications and operational design (reflective of normal operating conditions) through years of verifiable data. Individual actual emissions may be much lower.

According to the records supplied by the applicant, the Laguna Compressor Station has presented itself as a “grandfathered” source which means that it’s construction predates the effective date of EPA’ s major new source review programs. The Potential to Emit

provided in the permit as well as in this statement of basis, as a grandfathered source, is for informational purposes only, except with respect to compliance with stated performance in the application for permit renewal (see further discussion on this subject below). The Title V permit cannot prescribe the PTEs for the units, thereby making them enforceable rather than "for informational purposes", again except for applicable requirements. As explained in detail below, the Laguna station does not appear to be subject to any requirements of federal programs under the New Source Performance Standards (NSPS), but has made notification on December 10, 2004 that they are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for 40 CFR Part 63, Subpart ZZZZ for two engines (Unit No.'s Aux A-01 and Aux A-02). Requirements of the New Mexico State Implementation Plan (SIP) do not apply to this source, as it is located in Indian Country. As such, the Potential to Emit provided in the permit, as well as in this statement of basis, is for informational purposes only, except where specifically limited by the NESHAP, although other specific parameters related to the calculation of PTE may be monitored (see further discussion below). Also, the emissions from the facility will be calculated from recorded parameters in the permit, and tracked through annually submitted Fee Schedules (which include annual reports on criteria pollutant and hazardous air pollutant (HAP) actual emissions), to ensure that future changes to the source do not trigger federal CAA requirements.

IC Engine heat input rates: The company updated its Potential to Emit for all pollutants in the most recent updated application sent to EPA on September 11, 2008, and clarified with additional information on October 31, 2008. Additional clarifications to the PTE and engine status and types were received on October 31, 2008; April 30, 2009; June 30, 2009; July 9, 16, and 20, 2009; August 12, 2009; and September 1, 2009. The Company has confirmed that all engines at this site have had no physical or operation changes which may increase the emission rate of the units beyond their operational capacity since prior to initial Title V issuance. However, the information in the application includes a PTE, based on a previously submitted and permitted increases in heat input rate for the three 3400 horse power Clark internal combustion IC) engines (Units No.'s A-01, A-02, and A-03) from a confirmed 23.8 MMBtu/hr to 33.26 MMBtu/hr, and an increase in heat input rate for the two Ingersol Rand 544 horse power auxiliary IC engines (Units No.'s Aux A-01 and Aux A-02) from a calculated 4.6 MMBtu/hr to 8.13 MMBtu/hr. Prior to the recalculated increase in rating from the initially applied for 8.5 MMBtu/hr heat input rate for Units No.'s Aux A-01 and Aux A-02, the Company confirmed in response to comments to the public notice of the initial Title V permit action, that "The engine, as it is, cannot consume more heat input than its design allows." The Company however, applied for an application to "update" and change the heat input rate of all the engines at this source, as a "correction" to the record. Per supplied information from the Company on July 9, 2009, including specific manufacturer's data on these engines, plus emissions

inventories over the last nine years, a re-evaluation of the PTE has been made for both the engines involved and the source in general, initially at the uncontrolled rate for the pre-NESHAP requirements, and then at the controlled applicable rates.

Table 1. Potential to Emit in Tons per Year (tpy)
El Paso Natural Gas Company, Laguna Compressor Station, Laguna – Uncontrolled[1] emissions. See Table 6 for applicable limits.

Emissions Unit and Unit ID	**NOx**	**VOC**	**SO_2[3]**	**$PM_{2.5}$**	**PM_{10}**	**CO**	**Lead**	**HAP[2]**
A-01, Clark TLA-10, LNG fired Engine,	611	26	2.0	7.0	7.0	144	0	11.6
A-02, Clark TLA-10, LNG fired Engine,	611	26	2.0	7.0	7.0	144	0	11.6
A-03, Clark TLA-10, LNG fired Engine,	611	26	2.0	7.0	7.0	144	0	11.6
AUX A-01, Ingersoll-Rand	144	6.	0.5	0.7	0.7	149	0	0.6
AUX A-02, Ingersoll-Rand	144	6.	0.5	0.7	0.7	149	0	0.6
Facility SSM Emissions	0.0	3.8	0.0	0.0	0.0	0.0	0.0	0.13
TOTALS	2,121.6	93.2	7.0	22.4	22.4	722.1	0	36.13

[1] Uncontrolled emissions for informational purposes only (except with respect to Ingersol engine HAP emission rates – see Table 6 below)
[2] Mostly formaldehyde.
NOx - oxides of nitrogen
VOC - volatile organic compounds
SO2 - sulfur dioxide
PM10 - particulate matter with a diameter 10 microns or less
CO - carbon monoxide
HAP - hazardous air pollutants (*see* CAA Section 112(b))

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

Pollutant	**Total Emissions, tons/year** **Current Permit**	**Total Emissions, tons/year** **Proposed Permit**	**Total Emissions, tons/year** **Proposed Change**
NOx	2121	2121.6	0.6
SO_2	< 1	7.0	+7.0
CO	721	722.1	1.1
$PM_{2.5}$	N/A	22.4	+22.4
PM_{10}	N/A	22.4	+22.4
VOC	90	93.2	3.2
Lead	0	0	0
HAPs	23	36.13	+13.13

f. Emission Units and Emission Generating Activities

El Paso Natural Gas Company, LLC, Laguna Compressor Station provided in their application the information contained in tables 1, 3, and 4. All emission units and control devices at this facility are identified in tables 3 and 4. Table 2 lists changes in emissions proposed between the currently permitted levels and the proposed permitted levels. Emission units identified as "insignificant" are listed separately in table 4.

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

Table 3. Emission Units and Control Devices

Unit No.	Type of Unit Serial No.	Manufacturer Model No. Design Heat Input	Operating Range or Size of Unit	Date of Installation	Primary Use	Control Equipment
A-01	Natural gas fired Engine, #79007	Clark TLA-10 23.8 MMBtu/hr	3400 hp	1958	Compressor drive	None
A-02	Natural gas fired Engine, #79008	Clark TLA-10 23.8 MMBtu/hr	3400hp	1958	Compressor drive	None
A-03	Natural gas fired Engine, #79005	Clark TLA-10 23.8 MMBtu/hr	3400 hp	1958	Compressor drive	None
Aux-01	Natural gas fired engine, 8CPST227	Ingersol-Rand PSVG-8 4.6 MMBtu/hr	544	1958	Auxiliary electrical generators	None
Aux-02	Natural gas fired engine, 8CPST228	Ingersol-Rand PSVG-8 4.6 MMBtu/hr	544	1958	Auxiliary electrical generators	None

El Paso Natural Gas Company, LLC, Laguna Compressor Station states in their application and additional submitting information that the emission units in table 4 below are eligible for insignificant treatment under 40 CFR Part 71.5(c)(II)(ii). Most of these emission sources are fixed roof storage tanks used to store organic liquids, including ethylene glycol, diesel, fuel oil, and petroleum-based solvents. Other insignificant emission sources at the facility includes emergency system shutdown and blowdown activities; all natural gas-fired equipment used solely for heating buildings for personal comfort or producing hot water for personal use; and fugitive emissions from connections, flanges, open-ended lines, valves, and other components.

Table 4. Insignificant Emission Units

Emission Unit ID No.	Unit Description	Size	Exemptions to Federal Requirements
1	Fugitive VOC emissions	< 40 units	< 2 tpy regulated pollutants and < 0.5 tpy HAPs using GRI-HAPCalc estimate 40 CFR § 71.5(c)(11)(ii)
2	Emergency shut-down system and pressure relief valves	20/yr	< 2 tpy regulated pollutants and < 0.5 tpy HAPs 40 CFR § 71.5(c)(11)(ii)
3	Start-up/shut-down blowdown	50/yr	< 2 tpy regulated pollutants and < 0.5 tpy HAPs 40 CFR § 71.5(c)(11)(ii)
5	Space heater and hot-water heater for personal use	2	40 CFR § 71.5(c)(11)(i)(D)
14	Ethylene glycol tank	210 bbl Vapor pressure < 1.5 psia	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
16	9 Diesel and fuel oil storage tanks: Aux. lube oil Main engine lube oil Diesel Oil Northern-most, buried used oil Southern-most, buried used oil/oily water Eastern-most used oil Western-most used oil Upper-most used oil Lower-most used oil	 8820 gal 8820 gal 300 gal 1000 gal 1000 gal 734 gal 734 gal 734 gal 734 gal	< 2 tpy 40 CFR § 71.5(c)(11)(ii)
18	Petroleum based solvent tank	10,000 gallons vapor pressure < gasoline	< 2 tpy 40 CFR § 71.5(c)(11)(ii)

5. Applicable Requirements and Limitations:

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

Table 5: Applicable Regulations: El Paso Natural Gas Company, Laguna Compressor Station

Citation	Requirement	Comment
40 CFR 71	Federal Operating Permits Program	All Units
40 CFR § 63, Subpart A	General Provisions	Unit No.'s Aux A-01 and Aux A-02
40 CFR § 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	Unit No.'s Aux A-01 and Aux A-02

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

(1) Based on the information provided in the El Paso Natural Gas Company's application, the potential to emit for VOC includes 36 tons/year of formaldehyde, a change of +13.0 tons per year (tpy) from the current permit. This change is the result of recalculations of emissions from stack test, and is not the result of a physical change or change in method of operation or construction of the source.

The increase in Hazardous Air Pollutants (HAPs) to more than 10 tpy of any one listed HAP or ≥ 25 tpy of total HAPs makes this facility subject to the requirements of 40 CFR § 63, Subpart ZZZZ - Reciprocating Internal Combustion Engines, for Unit No.'s Aux-01 and Aux-02, as 4-stroke rich burn engines (4SRB). The other units at this site are two-stroke-lean-burn (2SLB) engines, as identified in the application for permit renewal and confirmed with additional information to the application. This is a facility with existing stationary RICE engines under the definition of 'existing stationary RICE', as it was constructed prior to December 19, 2002. The 2SLB engines meet the exemption for requirements under Subpart ZZZZ, as specified in 40 CFR Part 63.6590(b)(3), as they are existing spark ignition 2SLB stationary RICE. Under this exemption, these units also do not have to meet the requirements of 40 CFR § 63, Subpart A, nor is any initial notification necessary. The 4SRB engines, Unit No.'s

Aux-01 and Aux-02 are subject to 40 CFR § 63, Subpart ZZZZ, as specified in 40 CFR Part 63.6585, and all applicable portions of 40 CFR § 63, Subpart A listed below, as follows:

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

Unit	Emission limitations or requirement
Aux-01	a. reduce formaldehyde emissions by 76 percent or more. If construction or reconstruction commenced between December 19, 2002 and June 15, 2004, option to reduce formaldehyde emissions by 75 percent or more until June 15, 2007; or b. limit the concentration of formaldehyde in the stationary RICE exhaust 350 ppbvd or less at 15 percent O_2.
Aux-02	

Table 6a —Operating Limitations for Existing, New, and Reconstructed Spark Ignition, 4SRB for Stationary Reciprocating Internal Combustion Engines >500 HP Located at a Major Source of HAP Emissions

For each...	Operating limitation...
1. 4SRB stationary RICE complying with the requirement to reduce formaldehyde emissions by 76 percent or more (or by 75 percent or more, if applicable) and using NSCR; or	a. maintain catalyst so that the pressure drop across the catalyst does not change by more than 2 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
4SRB stationary RICE complying with the requirement to limit the concentration of formaldehyde in the stationary RICE exhaust to 350 ppbvd or less at 15 percent $O_2$and using NSCR.	b. maintain the temperature of 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.

Table 6b —Subsequent Performance Tests

For each . . .	Complying with the requirement to . . .	You must . . .
3. Stationary RICE (all stationary RICE subcategories and all brake horsepower ratings)	Limit the concentration of formaldehyde in the stationary RICE exhaust	Conduct subsequent performance tests semiannually.[1]

[1]After you have demonstrated compliance for two consecutive tests, you may reduce the frequency of subsequent performance tests to annually. If the results of any subsequent annual performance test indicate the stationary RICE is not in compliance with the CO or formaldehyde emission limitation, or you deviate from any of your operating limitations, you must resume semiannual performance tests.

Table 6c—Requirements for Performance Tests

For each . . .	Complying with the requirement to . . .	You must . . .	Using . . .	According to the following requirements . . .
2. 4SRB stationary RICE	a. Reduce formaldehyde emissions	i. Select the sampling port location and the number of traverse points; and	(1) Method 1 or 1A of 40 CFR part 60, appendix A §63.7(d)(1)(i)	(a) Sampling sites must be located at the inlet and outlet of the control device.
		ii. Measure O2 at the inlet and outlet of the control device; and	(1) Method 3 or 3A or 3B of 40 CFR part 60, appendix A, or ASTM Method D6522–00 (2005).	(a) Measurements to determine O2 concentration must be made at the same time as the measurements for formaldehyde concentration.
		iii. Measure moisture content at the inlet and outlet of the control device; and	(1) 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.

For each . . .	Complying with the requirement to . . .	You must . . .	Using . . .	According to the following requirements . . .
		iv. Measure formaldehyde at the inlet and the outlet of the control device	(1) Method 320 or 323 of 40 CFR part 63, appendix A; or ASTM D6348–03[b], 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	(a) 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.
3. Stationary RICE	a. Limit the concentration of formaldehyde in the stationary RICE exhaust	i. Select the sampling port location and the number of traverse points; and	(1) Method 1 or 1A of 40 CFR part 60, appendix A §63.7(d)(1)(i)	(a) If using a control device, the sampling site must be located at the outlet of the control device.
		ii. Determine the O2 concentration of the stationary RICE exhaust at the sampling port location; and	(1) Method 3 or 3A or 3B of 40 CFR part 60, appendix A, or ASTM Method D6522–00 (2005)	(a) Measurements to determine O2 concentration must be made at the same time and location as the measurements for formaldehyde concentration.
		iii. Measure moisture content of the stationary RICE exhaust at the sampling port location; and	(1) 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.

For each . . .	Complying with the requirement to . . .	You must . . .	Using . . .	According to the following requirements . . .
		iv. Measure formaldehyde at the exhaust of the stationary RICE	(1) Method 320 or 323 of 40 CFR part 63, appendix A; or ASTM D6348–03[b], 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	(a) 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.

[b]You may obtain a copy of ASTM–D6348–03 from at least one of the following addresses: American Society for Testing and Materials, 100 Barr Harbor Drive, West Conshohocken, PA 19428–2959, or University Microfilms International, 300 North Zeeb Road, Ann Arbor, MI 48106.

Table 6d—Initial Compliance With Emission Limitations and Operating Limitations

For each . . .	Complying with the requirement to . . .	You have demonstrated initial compliance if . . .
4. 4SRB stationary RICE	a. Reduce formaldehyde emissions and using NSCR	i. The average reduction of emissions of formaldehyde determined from the initial performance test is equal to or greater than the required formaldehyde percent reduction; and
		ii. You have installed a CPMS to continuously monitor catalyst inlet temperature according to the requirements in §63.6625(b); and
		iii. You have recorded the catalyst pressure drop and catalyst inlet temperature during the initial performance test.
6. Stationary RICE	a. Limit the concentration of formaldehyde in the stationary RICE exhaust and using oxidation catalyst or NSCR	i. The average formaldehyde concentration, corrected to 15 percent O_2, dry basis, from the three test runs is less than or equal to the formaldehyde emission limitation; and
		ii. You have installed a CPMS to continuously monitor catalyst inlet temperature according to the requirements in §63.6625(b); and

For each . . .	Complying with the requirement to . . .	You have demonstrated initial compliance if . . .
		iii. You have recorded the catalyst pressure drop and catalyst inlet temperature during the initial performance test.

Table 6e—Continuous Compliance With Emission Limitations and Operating Limitations

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
4. 4SRB stationary RICE	a. Reduce formaldehyde emissions and using NSCR	i. Collecting the catalyst inlet temperature data according to §63.6625(b); and
		ii. Reducing these data to 4-hour rolling averages; and
		iii. Maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and
		iv. 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.
7. Stationary RICE	Limit the concentration of formaldehyde in the stationary RICE exhaust and using oxidation catalyst or NSCR	i. Conducting semiannual performance tests for formaldehyde to demonstrate that your emissions remain at or below the formaldehyde concentration limit[1]; and
		ii. Collecting the catalyst inlet temperature data according to §63.6625(b); and
		iii. Reducing these data to 4-hour rolling averages; and
		iv. Maintaining the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature; and
		v. 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.

[1]After you have demonstrated compliance for two consecutive tests, you may reduce the frequency of subsequent performance tests to annually. If the results of any subsequent annual performance test indicate the stationary RICE is not in compliance with the CO or formaldehyde emission limitation, or you deviate from any of your operating limitations, you must resume semiannual performance tests.

Table 6f—Requirements for Reports

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report	a. If there are no deviations from any emission limitations or operating limitations that apply to you, 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 §63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; or	i. Semiannually according to the requirements in §63.6650(b).
	b. If you had a deviation from any emission limitation or operating limitation during the reporting period, the information in §63.6650(d). If there were periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in §63.8(c)(7), the information in §63.6650(e); or	i. Semiannually according to the requirements in §63.6650(b).
	c. If you had a startup, shutdown or malfunction during the reporting period, the information in §63.10(d)(5)(i)	i. Semiannually according to the requirements in §63.6650(b).
2. An immediate startup, shutdown, and malfunction report if actions addressing the startup, shutdown, or malfunction were inconsistent with your startup, shutdown, or malfunction plan during the reporting period	a. Actions taken for the event; and	i. By fax or telephone within 2 working days after starting actions inconsistent with the plan.

You must submit a(n)	The report must contain . . .	You must submit the report . . .
	b. The information in §63.10(d)(5)(ii).	i. By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authorities. (§63.10(d)(5)(ii))
3. Report	a. The fuel flow rate of each fuel and the heating values that were used in your calculations, and you 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	i. Annually, according to the requirements in §63.6650.
	b. The operating limits provided in your federally enforceable permit, and any deviations from these limits; and	i. See item 3.a.i.
	c. Any problems or errors suspected with the meters	i. See item 3.a.i.

Table 6g—Applicability of General Provisions to Subpart ZZZZ

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.1	General applicability of the General Provisions	Yes	
§63.2	Definitions	Yes	Additional terms defined in §63.6675.
§63.3	Units and abbreviations	Yes	
§63.4	Prohibited activities and circumvention	Yes	
§63.5	Construction and reconstruction	Yes	
§63.6(a)	Applicability	Yes	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.6(b)(1)–(4)	Compliance dates for new and reconstructed sources	Yes	
§63.6(b)(5)	Notification	Yes	
§63.6(b)(6)	[Reserved]		
§63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes	
§63.6(c)(1)–(2)	Compliance dates for existing sources	Yes	
§63.6(c)(3)–(4)	[Reserved]		
§36.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes	
§63.6(d)	[Reserved]		
§63.6(e)(1)	Operation and maintenance	Yes	
§63.6(e)(2)	[Reserved]		
§63.6(e)(3)	Startup, shutdown, and malfunction plan	Yes	
§63.6(f)(1)	Applicability of standards except during startup shutdown malfunction (SSM)	Yes	
§63.6(f)(2)	Methods for determining compliance	Yes	
§63.6(f)(3)	Finding of compliance	Yes	
§63.6(g)(1)–(3)	Use of alternate standard	Yes	
§63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
§63.6(i)	Compliance extension procedures and criteria	Yes	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.6(j)	Presidential compliance exemption	Yes	
§63.7(a)(1)–(2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at §§63.6610 and 63.6611 and 63.6612.
§63.7(a)(3)	CAA section 114 authority	Yes	
§63.7(b)(1)	Notification of performance test	Yes	Except that §63.7(b)(1) only applies as specified in §63.6645.
§63.7(b)(2)	Notification of rescheduling	Yes	Except that §63.7(b)(2) only applies as specified in §63.6645.
§63.7(c)	Quality assurance/test plan	Yes	Except that §63.(c) only applies as specified in §63.6645.
§63.7(d)	Testing facilities	Yes	
§63.7(e)(1)	Conditions for conducting performance tests	Yes	Subpart ZZZZ specifies conditions for conducting performance test at §63.6620.
§63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at §63.6620.
§63.7(e)(3)	Test run duration	Yes	
§63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes	
§63.7(f)	Alternative test method provisions	Yes	
§63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes	
§63.7(h)	Waiver of tests	Yes	
§63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at §63.6625.
§63.8(a)(2)	Performance specifications	Yes	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.8(a)(3)	[Reserved]		
§63.8(a)(4)	Monitoring for control devices	No	
§63.8(b)(1)	Monitoring	Yes	
§63.8(b)(2)–(3)	Multiple effluents and multiple monitoring systems	Yes	
§63.8(c)(1)	Monitoring system operation and maintenance	Yes	
§63.8(c)(1)(i)	Routine and predictable SSM	Yes	
§63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes	
§63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	Yes	
§63.8(c)(2)–(3)	Monitoring system installation	Yes	
§63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
§63.8(c)(6)–(8)	CMS requirements	Yes	Except that subpart ZZZZ does not require COMS.
§63.8(d)	CMS quality control	Yes	
§63.8(e)	CMS performance evaluation	Yes……. Except that §63.8(e) only applies as specified in§63.6645.	Except for §63.8(e)(5)(ii), which applies to COMS.
§63.8(f)(1)–(5)	Alternative monitoring method	Yes	Except that §63.8(f)(4) only applies as specified in §63.6645.
§63.8(f)(6)	Alternative to relative accuracy test	Yes	Except that §63.8(f)(6) only applies as specified in §63.6645.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§63.6635 and 63.6640.
§63.9(a)	Applicability and State delegation of notification requirements	Yes	
§63.9(b)(1)–(5)	Initial notifications	Yes……. Except that §63.9(b) only applies as specified in §63.6645.	Except that §63.9(b)(3) is reserved.
§63.9(c)	Request for compliance extension	Yes	Except that §63.9(c) only applies as specified in §63.6645.
§63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that §63.9(d) only applies as specified in §63.6645.
§63.9(e)	Notification of performance test	Yes	Except that §63.9(e) only applies as specified in §63.6645.
§63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(1)	Notification of performance evaluation	Yes	Except that §63.9(g) only applies as specified in §63.6645.
§63.9(g)(2)	Notification of use of COMS data	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	Yes……. Except that §63.9(g) only applies as specified in §63.6645.	If alternative is in use.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.9(h)(1)–(6)	Notification of compliance status	Yes	Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. §63.9(h)(4) is reserved. Except that §63.9(h) only applies as specified in §63.6645.
§63.9(i)	Adjustment of submittal deadlines	Yes	
§63.9(j)	Change in previous information	Yes	
§63.10(a)	Administrative provisions for record keeping/reporting	Yes	
§63.10(b)(1)	Record retention	Yes	
§63.10(b)(2)(i)–(v)	Records related to SSM	Yes	
§63.10(b)(2)(vi)–(xi)	Records	Yes	
§63.10(b)(2)(xii)	Record when under waiver	Yes	
§63.10(b)(2)(xiii)	Records when using alternative to RATA	Yes	For CO standard if using RATA alternative.
§63.10(b)(2)(xiv)	Records of supporting documentation	Yes	
§63.10(b)(3)	Records of applicability determination	Yes	
§63.10(c)	Additional records for sources using CEMS	Yes	Except that §63.10(c)(2)–(4) and (9) are reserved.
§63.10(d)(1)	General reporting requirements	Yes	
§63.10(d)(2)	Report of performance test results	Yes	
§63.10(d)(3)	Reporting opacity or VE observations	No	Subpart ZZZZ does not contain opacity or VE standards.
§63.10(d)(4)	Progress reports	Yes	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§63.10(d)(5)	Startup, shutdown, and malfunction reports	No	
§63.10(e)(1) and (2)(i)	Additional CMS reports	Yes	
§63.10(e)(2)(ii)	COMS-related report	No	Subpart ZZZZ does not require COMS.
§63.10(e)(3)	Excess emission and parameter exceedances reports	Yes	Except that §63.10(e)(3)(i)(C) is reserved.
§63.10(e)(4)	Reporting COMS data	No	Subpart ZZZZ does not require COMS.
§63.10(f)	Waiver for recordkeeping/reporting	Yes	
§63.11	Flares	No	
§63.12	State authority and delegations	Yes	
§63.13	Addresses	Yes	
§63.14	Incorporation by reference	Yes	
§63.15	Availability of information	Yes	

(2) As a major source of HAPs, this facility would be potentially subject to the emission standards of 40 CFR § 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, because they process and/or store natural gas. However, these activities occur after the point of custody and are classified in the Natural Gas Transmission category; thus, the Laguna station is not subject to these requirements.

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

5.5. Additional Requirements

The El Paso Natural Gas Company, LCC, Laguna Compressor Station application was reviewed to determine that it meets all the requirements of the Part 71 Operating Permits Program. Based on the information provided by Company in their application, the Laguna Compressor Station would be subject to the following generic permit requirements:

a. Fuel Usage Rates:

The fuel type used at this facility is natural gas which is used in emission Unit No.'s A-01, A-02, A-03, Aux A-01, and Aux A-02. The maximum annual usage rate determined through a reasonable PTE determination for Unit No.'s A-01 through A-03 is 319.5. mmscf/yr and Unit No.'s Aux A-01 and Aux A-02 is 78.1 mmscf/yr. Based on this information, the combined total amount of natural gas burned at this facility shall not exceed 1,114.7 mmscf per year. A monitoring/recordkeeping/reporting requirement has been placed in the permit on this requirement.

b. Heat Input:

The maximum design heat input for Unit No's A-01, A-02 and A-03 has been determined to be 33.26 MMBtu/hr, and the maximum design heat input for Unit No's Aux-01 and Aux-02 has been determined to be 8.13 MMBtu/hr. A monitoring/recordkeeping/reporting requirement has been placed in the permit for all units on this requirement.

c. Recordkeeping:

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

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

d. Other Requirements

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

The Federal CAM regulations require certain sources to comply with additional monitoring requirements if specific applicability criteria are met. The criteria are related to emission limitations or standards for applicable regulated air pollutants, the use of a control device to achieve compliance with the limitation or standard, or the unit potential pre-control device emissions of applicable regulated air pollutants at specified amounts. In the case of this facility, the three gas compressor engines are not subject to an emission limitation or standard, and are not equipped with controls. Therefore, CAM is not applicable to these units. The remaining auxiliary engines are subject to NESHAP requirements.

(2) Other Applicable Requirements

Based on the information provided in the El Paso Natural Gas Company, LLC's application, EPA has no evidence that this source is subject to any other existing federally applicable programs for emission controls. Federal CAA programs include Prevention of Significant Deterioration, New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants, and the acid rain program under Title IV of the CAA. For applicable requirements, see further discussion on requirements under National Emission Standards for Hazardous Air Pollutants in Section 4.d above. Further, El Paso's Laguna Compressor Station is not subject to any implementation plan, such as exist within State jurisdictions. Therefore, El Paso Natural Gas Company, LLC, Laguna Compressor Station is not subject to any further substantive requirements that control its emissions under the CAA, other than those described under Section 4.d above, beyond collection and recordkeeping to provide materials that substantiate existing permit requirements.

The EPA recognizes that, in some cases, sources of air pollution located in Indian country are subject to fewer requirements than similar sources located on land under the jurisdiction of a State or local air pollution control agency. Further, EPA encourages and will work closely with all Tribes wishing to develop Tribal Implementation Plans (TIPs) for approval under the Tribal Authority Rule. The EPA intends that its Federal regulations created through a FIP will apply only in those situations, in which a Tribe does not have an approved TIP.

(3) Additional Conditions:

a. Monitoring

(i) The Company will continue to be required to monitor the heat input rate of all the engines for verification purposes toward the permitted emission levels. Monitoring of heat input rate of each engine will occur once per month on a twelve (12) month average. The Company will be required to operate all equipment in accordance with manufacturer's design values for that equipment.

(ii) The Company has fuel monitoring on both Ingersol engines (Unit No.'s Aux A-01 and Aux A-02) on a single meter, assuming that only one engine operates at any given time per year, per statements from El Paso Natural Gas Company. However, in records for reporting years 2000, 2003 and 2004, the total operating time for the two engines exceeded 8760 hours. This exceedance indicates that both engines were operating at the same time. While it is common to run both engines simultaneously during changeover, in at least one instance (2003), the changeover time was excessive (186 hours). Therefore, the Company will be required to separately monitor each engine to assure compliance with the fuel use limit established in this permit.

b. Combustion: As the fuel use rated limits are based on use of pipeline quality natural gas, the source will continue to be required to burn only pipeline quality natural gas for combustion in the Clark IC engines (Units No A-1 through A-3) and Ingersol IC engines (Units No. Aux A-1 and Aux A-2). Pipeline quality natural gas is defined as sweet natural gas of pipeline quality containing a maximum of 0.25 grains of H_2S per 100 cubic feet. Should the source require a fuel source change other than pipeline quality natural gas, they must first apply for modification to the permit to account for any increases in emissions. The source will continue to comply with emission standards for 40 CFR § 63, Subpart ZZZZ for the Ingersol engines, Unit No.'s Aux-01 and Aux-02.

6. Credible Evidence:

Language is placed in the permit which states that credible evidence may be used to demonstrate whether a source would have been in compliance with applicable requirements of the permit, if the appropriate performance or compliance test, using specific methods or procedure to assess compliance, had been performed for purposes of Title V compliance certifications. Also, nothing

in the permit will preclude the use, including exclusive use, of credible evidence or information by any person for purposes of establishing whether or not a source is in violation of permit conditions or limitations.