



NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY

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Ben Shelly
PRESIDENT

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TITLE V PERMIT TO OPERATE

PERMIT #: NN OP 05-008
FACILITY NAME: EL PASO NATURAL GAS COMPANY - WHITE ROCK COMPRESSOR STATION
LOCATION: NEWCOMB
COUNTY: SAN JUAN
STATE: NM

ISSUE DATE: 12/30/2008
EXPIRATION DATE: 12/30/2013
AFS PLANT ID: 35-045-NAV97
PERMITTING AUTHORITY: NNEPA

ACTION/STATUS: ADMINISTRATIVE AMENDMENT

Sam A. Armenta, Albuquerque Division Director
El Paso Natural Gas Company (EPNG) - White Rock Compressor Station
3801 Atrisco Blvd., NW
Albuquerque, New Mexico 87120

Re: Administrative Amendment to Title V Operating Permit for El Paso Natural Gas Company (EPNG) - White Rock Compressor Station

Dear Mr. Armenta:

We are issuing an administrative amendment to the Title V Operating Permit, NN OP 05-008, to incorporate the administrative amendment to the Prevention of Significant Deterioration Permit for White Rock Compressor Station, PSD-NM-1000-B, issued by U.S.EPA Region 9 on October 25, 2010. NNEPA has made these changes under an administrative amendment, pursuant to 40 C.F.R § 71.7(d)(1)(v).

We have enclosed Section II.A PSD Requirements of the amended permit, with a clear understanding that the changes made in the permit will not affect the permit terms that became effective on December 30, 2008 and expire on December 30, 2013. A copy of this administrative permit amendment is also being provided to USEPA Region 9, pursuant to 40 CFR § 71.7(d)(3)(ii). If you have any questions regarding this matter, please contact Charlene Nelson at (928) 729-4247 or charlenenelson@navajo.org.

JAN 26 2011

Date

Handwritten signature of Stephen B. Etsitty

Stephen B. Etsitty
Executive Director
Navajo Nation Environmental Protection Agency

I. Source Identification

- Parent Company Name: El Paso Natural Gas Company
- Parent Company Mailing Address: 2 North Nevada Avenue
Colorado Springs, Colorado 80903
- Plant Name: El Paso Natural Gas Company - White Rock Compressor Station
- Plant Location: NE 1/4 of Section 15, Township 23-N,
Range 14-W, 22 miles east of Newcomb, NM
- County: San Juan, New Mexico
- EPA Region: 9
- Reservation: Navajo Nation
- Tribe: Navajo
- Company Contact: Richard Duarte Phone: (505) 831-7763
- Responsible Official: Sam A. Armenta Phone: (505) 831-7772
- EPA Contact: Roger Kohn Phone: (415) 972-3973
- Tribal Contacts: Charlene Nelson Phone: (928) 729-4247
- SIC Code: 4922
- AFS Plant Identification Number: 35-045-NAV97
- Description of Process: The facility is a natural gas compressor station.
- Significant Emission Units:

Unit ID/ Stack ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
A-01	One (1) natural gas-fired simple-cycle turbine	79.2 MMBtu/hr 10,040 hp	1966	N/A
A-02	One (1) natural gas-fired simple cycle turbine	93.9 MMBtu/hr 13,830 hp	1991	N/A
AUX A-01	One (1) natural gas-fired RICE, for auxiliary power generation	2.6 MMBtu/hr 365 hp	2005	N/A
AUX A-02	One (1) natural gas-fired RICE, for auxiliary power generation	4.4 MMBtu/hr 400 hp	1991	N/A

II. Requirements for Specific Units

II.A PSD Requirements

- The following tables list all sources of air contaminants on applicant's property emitted by the facility covered by Permit No. PSD-NM-1000-B. The emission rates shown are those derived from information submitted as part of the application for Permit No. PSD-NM-1000-B. The hourly NO_x and CO emission rates listed below are directly enforceable. Any proposed increase in emission rates may require an application for a modification of the facilities covered by Permit No. PSD-NM-1000-B. [Permit no. PSD-NM-1000-B, Special Condition VI.A]

Emission Unit ID#	Emission Unit	Emission Rates (lb/hr)	
		NO _x	CO
A-01	GE Frame 3 Gas Turbine	40.41	7.33
A-02	GE Frame 3 Gas Turbine	15.16	10.68
AUX A-01	One (1) natural gas-fired RICE, for auxiliary power generation	1.61	3.02
AUX A-02	One (1) natural gas-fired RICE, for auxiliary power generation	8.00	1.40

Emission Unit ID#	Emission Unit	Emission Rates (tons/yr)	
		NO _x	CO
A-01	Upgraded GE Frame 3 Gas Turbine	177	32.1
A-02	New GE Frame 3 Gas Turbine	66.4	46.8
AUX A-01	One (1) natural gas-fired RICE, for auxiliary power generation	7.05	13.22
AUX A-02	One (1) natural gas-fired RICE, for auxiliary power generation	0.4	0.07

- The emission concentration of nitrogen oxides (NO_x) in the stack gases from the gas turbine identified as emission point A-01 shall not exceed 166 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit no. PSD-NM-1000-B, Special Condition VI.C.a]
- The emission concentration of carbon monoxide (CO) in the stack gases from the gas turbine identified as emission point A-01 shall not exceed 50 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit no. PSD-NM-1000-B, Special Condition VI.D.a]
- Dry low NO_x (DLN) combustion shall be installed and in operation by June 1, 1994. After that date, and thereafter, emission point A-02 shall effect an emission reduction on this turbine such that the emission concentration of nitrogen oxides (NO_x) in the stack gases from the gas turbine identified as emission point A-02

shall not exceed 42 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit no. PSD-NM-1000-B, Special Condition VI.C.b]

5. The emission concentration of carbon monoxide (CO) in the stack gases from the gas turbine identified as emission point A-02 shall not exceed 61 parts per million by volume (ppmv). Measured stack concentrations shall be expressed on a dry basis at 15 percent oxygen. [Permit no. PSD-NM-1000-B, Special Condition VI.D.b]
6. Emissions from the gas turbines shall not exceed 10 percent opacity, as determined by EPA Reference Method 9. [Permit no. PSD-NM-1000-B, Special Condition VI.E]
7. Fuel fired at this facility is limited to pipeline quality sweet natural gas containing a maximum of 0.25 grains of Hydrogen Sulfide and 5.0 grains total sulfur per 100 dry standard cubic feet. Use of any other fuel will require a modification to this permit. [Permit no. PSD-NM-1000-B, Special Condition VI.G]
8. The upgraded gas turbine identified as emission point A-01 shall comply with all applicable requirements of EPA regulations on Standards of Performance for New Stationary Sources promulgated for stationary gas turbines in 40 CFR Part 60, subparts A and GG. If any provision of this Permit No. PSD-NM-1000-B is more stringent than the regulations so incorporated, then for the purpose of complying with Permit No. PSD-NM-1000-B, the permit shall govern and be the standard by which compliance shall be demonstrated [Permit No. PSD-NM-1000-B Special Provision VI.B].

Work Practice and Operational Requirements

9. Operation of the emergency generator, identified as emission point AUX A-02, shall be limited only to times when the full-time generator, identified as emission point AUX A-01, is not operational. [Permit no. PSD-NM-1000-B, Special Condition VI.H]

Monitoring and Testing Requirements

10. It shall be the responsibility of the holder of this permit to demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods and monitoring methods proposed as alternatives to methods indicated in the provisions of permit PSD-NM-1000-B. Alternative methods shall be applied for in writing and shall be reviewed and approved by the U.S.EPA Region 9 prior to their use in fulfilling any requirements of permit PSD-NM-1000. [Permit no. PSD-NM-1000-B, Permit Condition I]

11. If sampling of stacks or process vents is required, the holder of this permit is responsible for providing sampling facilities and conducting the sampling operations at his own expense. [Permit no. PSD-NM-1000-B, Permit Condition II]
12. The parameters necessary to comply with the concentration limits stated in conditions II.A.2, II.A.3, II.A.4, and II.A.5 of this permit shall be determined during the stack sampling required in condition II.A.13 of this permit and shall be determined during the operation of each turbine at four points in accordance with condition II.A.13.e of this permit. [Permit no. PSD-NM-1000-B, Special Condition VI.F]
13. The holder of this permit shall perform stack sampling and other testing to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from each turbine. [Permit no. PSD-NM-1000-B, Special Condition VI.I]
 - a. Sampling must be conducted in accordance with EPA Reference Method 20 for the concentration of NO_x and Oxygen; Method 10 for the concentration of CO, and Method 9 for Opacity. Consistent with II.A.10, U.S.EPA Reference Method 7E is also approved for sampling the concentration of NO_x and oxygen.
 - b. Sampling by means of one of the test methods specified in 40 CFR 60.335(b) shall be conducted to determine initial compliance with the fuel sulfur limit of condition II.A.7. Fuel sampling may be performed at a point along the pipeline other than the White Rock Compressor Station after El Paso Natural Gas demonstrates to the satisfaction of U.S.EPA Region 9 that fuel data collected at that point will be representative of conditions at the White Rock Compressor Station.
 - c. The NNEPA and U.S. EPA Region 9 shall be contacted as soon as testing is scheduled but not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:
 - i. Date for pretest meeting.
 - ii. Date sampling will occur.
 - iii. Name of firm conducting sampling.
 - iv. Type of sampling equipment to be used.
 - v. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data and to review the format procedures for submitting the test reports.

A written proposed description of any deviation from sampling procedures specified in the permit provisions shall be made available to the NNEPA and U.S. EPA Region 9 prior to the pretest meetings. The NNEPA and

U.S. EPA Region 9 shall approve or disapprove of any deviation from specified sampling procedures prior to its use. Requests to waive testing for any pollutant specified in the permit provisions shall be submitted to NNEPA and U.S. EPA Region 9 for approval. Requests for alternate/equivalent procedures for NSPS testing shall be submitted to the NNEPA and U.S. EPA Region 9 for approval.

- d. Air contaminants to be tested include (but are not limited to) NO_x, CO, and opacity.
- e. Sampling of the turbine shall be conducted at four points in the normal operating sample of the gas turbine, including the minimum point in the sample and peak load.
- f. Sampling shall occur at such times specified in condition II.A.14 of this permit and at other such times as may be required by the NNEPA and U.S. EPA Region 9.
- g. Copies of the final sampling report shall be forwarded to NNEPA and U.S. EPA Region 9 within 60 days after the sampling is completed. The report shall be sent to:

Navajo Nation Air Quality Control Program
Operating Permit Program
P.O. Box 529
Fort Defiance, AZ 86504

and
Director, Air Division (Attn: AIR-1)
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

- 14. The holder of this permit shall perform a compliance stack test annually for NO_x, CO and Opacity on Units A-01 and A-02 except as provided below. The holder of this permit may request in writing, to U.S. EPA Region 9 an approval to revise the source test requirements, to include one of the following: A compliance test to be conducted every two or three years; a test to be conducted every quarter with a portable monitor; or a customized monitoring method approved by U.S. EPA Region 9.

Testing is not required for Units A-01 or A-02 in any calendar year in which the unit operates 2,190 hours or less. Regardless of this exemption, each turbine shall be tested at least once every five years. [Permit no. PSD-NM-1000-B, Special Condition VI.J.1]

- 15. After the required demonstrations of initial compliance for this facility, the method required in conditions II.A.13.a and II.A.13.b of this permit shall be used

to determine continuous compliance with the provisions of this permit [Permit no. PSD-NM-1000-B, Special Condition VI.J.2]

16. Within 180 days of issuance of this permit, and subsequently at least once every 5 years, the permittee shall conduct a performance test for NO_x emissions from both generators AUX A-01 and AUX A-02. This test shall be conducted at the maximum operating capacity of the equipment being tested, as the available electrical load conditions permit. If testing is performed at less than the maximum operating capacity of the equipment being tested, the operating load must be reported, along with the test results, as a fraction of maximum capacity. [40 CFR 71.6(a)(3)(i)]

Recordkeeping Requirements

17. Information and data concerning production, operating hours, sampling and monitoring data, if applicable, fuel type and fuel sulfur content, if applicable, and all other information required by 40 CFR 60 shall be maintained in a file at the plant site or other previously approved location and made available at the request of personnel from U.S. EPA. The file shall be retained for at least five years following the date that the information is obtained. [Permit No. PSD-NM-1000-B, Permit Condition V, 40 CFR 71.6(a)(3)(ii), 40 CFR 60.7(f)]
18. In addition to other applicable recordkeeping requirements, the following information shall be maintained in a file by the holder of this permit for a period of two years on a rolling retention basis and shall be made available on request to representatives of the U.S. EPA [Permit No. PSD-NM-1000-B, Special Condition VI.K]:
 - a. The results of all fuel sampling conducted pursuant to condition II.A.14 of this permit.
 - b. The results of all stack tests conducted pursuant to condition II.A.13 of this permit.
 - c. The results of all monitoring/testing conducted pursuant to condition II.A.15 of this permit.
 - d. Record of the hours of operation of the emergency generator.

Reporting Requirements

19. The holder of this permit shall submit, to the U.S.EPA Region 9, reports as described in 40 CFR 60.7. Such reports are required for gas turbine units A-01 and A-02. In addition to the applicable information specified in 60.7(c), semiannual reports are required and should contain the hours of operation of the facility and a report summary of the periods of noncompliance. For the purpose of this permit, periods of noncompliance will be periods of exceedance of the parameters specified in condition II.A.12 of this permit and reported in units of pounds per hour and tons per year, and the sulfur content limitations specified in Condition II.A.7 of this permit. [Permit no. PSD-NM-1000-B, Special Condition VI.L]