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

Re: Minor Modification to Title V Operating Permit # NN OP 05-009, El Paso Natural Gas Company (EPNG), Window Rock Compressor Station

Dear Mr. Armenta:

In accordance with the provisions of Title V of the Clean Air Act, 40 CFR Part 71, Navajo Nation Operating Permit Regulations, and all other applicable rules and regulations, NNEPA is issuing a minor modification to the Title V permit issued to El Paso Natural Gas Company (EPNG) Window Rock Compressor Station.

NNEPA received an application for a Minor Modification to Operating Permit No. NN OP 05-009 on October 18, 2010. The permittee requested the removal of three natural gas-fired auxiliary engines from the permit as well as the associated NESHAP 40 CFR 63 Subpart ZZZZ requirements, since these units have been permanently shutdown. The permittee also requested the addition of two microturbine packages that have replaced the auxiliary engines. NNEPA has determined that these changes qualify as minor permit modifications, pursuant to 40 CFR § 71.7(e)(1)(i)(A) and NNOPR Subpart I § 102.32. The permit conditions for NESHAP Subpart ZZZZ have been removed from the permit and the Section I Table "Significant Emission Units" has been updated along with the facility's Potential to Emit.

We have enclosed the minor permit modification, with a clear understanding that the changes made in the permit will not affect the permit terms that became effective August 15, 2008 and expire on August 15, 2013. If you have any questions regarding this matter, please contact Charlene Nelson at (928) 729-4246 or charlenenelson@navajo.org.

MAY 27 2011

Date

A handwritten signature in black ink, appearing to read "Stephen B. Etsitty", is written over a horizontal line.

Stephen B. Etsitty, Executive Director
Navajo Nation Environmental Protection Agency



Navajo Nation Environmental Protection Agency – Air Quality Control/Operating Permit Program
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TITLE V PERMIT TO OPERATE

<u>PERMIT #:</u> NN OP 05-009	<u>FACILITY NAME:</u> EL PASO NATURAL GAS COMPANY - WINDOW ROCK COMPRESSOR STATION	<u>LOCATION:</u> WINDOW ROCK	<u>COUNTY:</u> APACHE	<u>STATE:</u> AZ
<u>ISSUE DATE:</u> 08/15/2008	<u>EXPIRATION DATE:</u> 08/15/2013	<u>AFS PLANT ID:</u> 04-001-N0611	<u>PERMITTING AUTHORITY:</u> NNEPA	

ACTION/STATUS: MINOR PERMIT MODIFICATION

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Abbreviations and Acronyms

Administrator	Administrator of the U.S. EPA
AR	Acid Rain
ARP	Acid Rain Program
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CMS	Continuous Monitoring System
CPMS	Continuous Parameter Monitoring System
CO	Carbon Monoxide
EIP	Economic Incentives Program
gal	gallon
HAP	Hazardous Air Pollutant
hp	horse power
hr	hour
Id. No.	Identification Number
ISO	International Standards Organization
kg	kilogram
lb	pound
MMBtu	million British Thermal Units
mo	month
NESHAP	National Emission Standards for Hazardous Air Pollutants
NNEPA	Navajo Nation Environmental Protection Agency
NNOPR	Navajo Nation Operating Permit Regulations
NNADCR	Navajo Nation Acid Deposition Control Regulations
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards
NSCR	Non-Selective Catalytic Reduction
NSR	New Source Review
PM	Particulate Matter
PM-10	Particulate matter less than 10 microns in diameter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
psia	pounds per square inch absolute
RICE	Reciprocating Internal Combustion Engine
RMP	Risk Management Plan
SNAP	Significant New Alternatives Program
SO ₂	Sulfur Dioxide
TSP	Total Suspended Particulate
U.S. EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

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 – Window Rock Compressor Station
- Plant Location: W 1/2 NE 1/4 Section 34, Township 26-N, Range 30-E,
22 miles West of Gallup, NM, Arizona
- County: Apache, Arizona
- 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: Eugenia Quintana Phone: (928) 871-7800
Charlene Nelson Phone: (928) 729-4247
- SIC Code: 4922
- AFS Plant Identification Number: 04-001-N0611
- 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 through A-06	Six (6) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp (each)	1958	N/A
A-07	One (1) natural gas-fired simple-cycle turbine, Solar Centaur 50-T5502. This unit is equipped with a NOx CEM.	42.3 MMBtu/hr 4,530 hp	1992	Dry Low- NOx combustion
B-01	One (1) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp	1959	N/A
B-02 and B-03	Two (2) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp (each)	1960	N/A
B-04	One (1) natural gas-fired engine, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp	1964	N/A
B-05	One (1) natural gas-fired engine, Worthington SUTC-1610	20.5 MMBtu/hr 2,700 hp	1964	N/A
B-06	One (1) natural gas-fired engine, Worthington ML-10	21.3 MMBtu/hr 2,800 hp	1966	N/A
AUX B-04 through AUX B-11	Two (2) Capstone microturbine packages (consisting of eight (8) C200 units) for auxiliary power	18.2 MMBtu/hr 2145 hp (ISO) (total)	2009	N/A

II. Requirements for Specific Units

II.A. PSD Permit Requirements

The following requirements apply to the operation, maintenance, and testing of turbine A-07:

1. The permittee shall not discharge or cause the discharge into the atmosphere NO_x (as NO₂) in excess of the more stringent of 6.1 lb/hr or 42 ppmvd of NO_x at 15% O₂ (3-hour rolling average, ISO conditions) from the stack venting gas turbine A-07. [PSD permit AZP 90-1 Condition IX.D; 40 CFR 60.332(a)(2)]
2. The permittee shall not discharge or cause the discharge into the atmosphere CO in excess of the more stringent of 5.10 lb/hr of 50 ppmvd at 15% O₂ (3-hour rolling average) from the stack venting gas turbine A-07. [PSD Permit AZP 90-1 Condition IX.D]
3. The permittee shall not discharge or cause the discharge into the atmosphere any gases with an opacity in excess of 10% (six-minute rolling average) from the stack venting the Solar Centaur H gas transmission turbine (unit A-07). [PSD permit AZP 90-1 Condition IX.D]

Work Practice and Operational Requirements

4. The permittee shall install and continuously operate a dry low NO_x combustor for control of NO_x emissions from gas turbine A-07. [PSD permit AZP 90-1 Condition IX.B]

Monitoring and Testing Requirements

5. Annually, and at such other times as specified by NNEPA, the permittee shall conduct performance tests for NO_x and CO emissions from gas turbine A-07 and furnish NNEPA and U.S. EPA a written report of the results of such tests. The tests for NO_x and CO shall be conducted at the maximum operating capacity of the facility being tested. Upon written request from the permittee, NNEPA and U.S. EPA may approve the conducting of performance tests at a lower specified production rate. Also, after initial performance tests and upon written request from the permittee, NNEPA and U.S. EPA may approve the deletion of a specific annual test for the combustion units. [PSD permit AZP 90-1 Condition IX.C.1.a and b]
6. Performance tests for the emissions of NO_x and CO from gas turbine A-07 shall be conducted and the results reported in accordance with the test methods set forth in 40 CFR 60, Part 60.8 and Appendix A. These performance tests shall be conducted using EPA Methods 1-4, 7E and 19. [PSD permit AZP 90-1 Condition IX.C.2]

7. U.S. EPA shall be notified in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. Such prior approval will minimize the possibility of U.S. EPA rejection of test results for procedural deficiencies. In lieu of the above mentioned test methods, equivalent methods may be used with prior written approval from U.S. EPA. [PSD permit AZP 90-1 Condition IX.C.2]

NNEPA shall be notified in writing at least 30 days prior to such tests to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. In lieu of the above mentioned test methods, equivalent methods may be used with prior written approval from NNEPA. [NNEPA §302(I)]

8. For performance test purposes, sampling ports, platforms, and access shall be provided by the permittee on the combustion exhaust system in accordance with 40 CFR 60.8(e). [PSD permit AZP 90-1 Condition IX.C.3]
9. The permittee shall install, certify, maintain, operate, and quality-assure a continuous emission monitoring system (CEMS) to monitor NO_x, CO, O₂, and stack gas volumetric flow rates on gas turbine A-07. The CEMS shall be installed, certified, maintained and operated as follows:

Each CEMS must be installed and certified according to performance specifications 2 and 3 (for diluent) of 40 CFR 60 Appendix B, except the 7-day calibration drift is based on unit operating days, not calendar days. Appendix F, Procedure 1 is not required. The relative accuracy test audit (RATA) of the NO_x and diluent monitors may be performed individually or on a combined basis, i.e., the relative accuracy tests of the CEMS may be performed either:

- (a) on a ppm basis (for NO_x) and a percent O₂ basis for oxygen; or
- (b) on a ppm at 15 percent O₂ basis; or
- (c) on a ppm basis (for NO_x) and a percent CO₂ basis (for CO₂ monitor that uses the procedures in Method 20 to correct the NO_x data to 15 percent O₂. [40 CFR 60.334(b)(1) and 60.334(c); PSD Permit AZP 90-1 Condition IX.E.1.a, b]

10. The permittee shall perform a RATA for the CEMS on the gas turbine A-07 at least once every four successive operating quarters. An operating quarter is defined as a calendar quarter in which the gas turbine A-07 operates at least 438 hours (i.e., operation 20% of the time). A calendar quarter that does not qualify as an operating quarter shall be excluded in determining the deadline for the next RATA. No more than eight successive calendar quarters shall elapse after the quarter in which a RATA was last performed without a subsequent RATA having been conducted. [40 CFR 71.6(a)(3)(i)]
11. Upon submittal of a minimum of one (1) year of simultaneous onsite CEMS and alternative compliance monitoring data prior to the retrofit of the dry low NO_x combustor, and one (1) year minimum of simultaneous onsite CEMS and

alternative continuous monitoring data after the retrofit of the dry low NO_x combustor, the permittee shall have the opportunity to demonstrate that, at this site, the alternative continuous monitoring system is equivalent to the CEMS required above. After the above demonstration has been made to the satisfaction of NNEPA and U.S. EPA Region 9 (Att: AIR-5), and upon written approval from NNEPA and U.S. EPA Region 9, the permittee may replace the CEMS with the alternative continuous monitoring systems [PSD Permit AZP 90-1 Condition IX.E.2]

12. The permittee shall maintain a quality assurance project plan for the certification and operation of the CEMS. Such a plan shall conform to the quality assurance procedures set forth in 40 CFR 60 Appendix F, "Quality Assurance Procedures" [PSD Permit AZP 90-1 Condition IX.E.6].

Recordkeeping Requirements

13. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports and records. [PSD permit AZP 90-1 Condition IX.E.7, 40 CFR 71.6(a)(3)(ii), 40 CFR 60.7(f)]

Reporting Requirements

14. The permittee shall submit a written report of all excess emissions to NNEPA and U.S. EPA (Attn: AIR-3) for every calendar quarter. The report shall include the following [PSD permit AZP 90-1 Condition IX.E.3]:
 - a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors(s) used, and the date and time of commencement and completion of each time period of excess emissions.
 - b. Specific identification of each period of excess emissions that occur during start-ups, shutdowns, and malfunctions of any compressors. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted shall also be reported.
 - c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
 - d. When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report.

- e. Excess emissions shall be defined as the following:
 - (1) Any three-hour period during which the average emissions of NO_x and/or CO, as measured by the continuous monitoring system or by a performance test, exceed the maximum emission limits set forth for each of the pollutants in Condition II.A.1 and II.A.2 above.
 - f. Excess emissions indicated by the CEM system shall be considered violations of the applicable emission limits for the purposes of this permit.
15. In the event of any changes in control or ownership of the facility, PSD permit AZP 90-1 is binding on all subsequent owners and operators. The permittee shall notify the owner and operator of the existence of PSD permit AZP 90-1 and its conditions by letter, a copy of which shall be forwarded to NNEPA and US EPA Region 9 [PSD permit AZP 90-1 Condition VI].

II.B. NSPS General Provisions

The following requirements apply to the operation, maintenance, and testing of turbine A-07 in accordance with 40 CFR Part 60, Subparts A and GG (“Standards of Performance for Stationary Gas Turbines”):

1. All requests, reports, applications, submittals, and other communications to the Administrator (NNEPA) pursuant to 40 CFR Part 60 shall be submitted in duplicate to the NNEPA and U.S. EPA Region 9 office at the following addresses [40 CFR § 60.4(a)]:

Navajo Nation Environmental Protection Agency
Air Quality Control Program
P.O. Box 529
Fort Defiance, AZ 86504

and

EPA Region 9
Director, Air Division (Attn: AIR-1)
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

2. Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative [40 CFR § 60.7(b)].
3. The availability to the public of information provided to, or otherwise obtained by, the EPA Administrator under this permit shall be governed by 40 CFR § 2

(Information submitted voluntarily to the Administrator for the purposes of compliance with 40 CFR §§ 60.5 and 60.6 is governed by 40 CFR §§ 2.201 through § 2.213 and not by 40 CFR § 2.301.) [40 CFR § 60.9].

4. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected facilities including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source [40 CFR § 60.11(d), PSD Permit AZP 90-1 Condition III].
5. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in 40 CFR § 60, nothing in 40 CFR § 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed [40 CFR § 60.11(g)].
6. No owner or operator subject to the provisions of 40 CFR § 60 shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere [40 CFR § 60.12].
7. With respect to compliance with all New Source Performance Standards (NSPS) of 40 CFR § 60, the permittee shall comply with the “General notification and reporting requirements” found in 40 CFR § 60.19 [40 CFR § 60.19].
8. The permittee shall provide written notification to NNEPA and U.S. EPA or, if acceptable to NNEPA, U.S. EPA and the permittee, electronic notification of any reconstruction of an affected facility, or any physical or operational change to an affected facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under this permit or in 40 CFR § 60.14(e), in accordance with 40 CFR § 60.7 [40 CFR § 60.7(a)].

II.C. NSPS Requirements

Emission Limits

1. The permittee shall not burn any fuel in gas turbine A-07 which contains sulfur in excess of 0.8 percent by weight. [40 CFR 60.333(b)]

2. Gas turbine A-07 shall be exempt from the NO_x standard in 40 CFR 60.332(a)(2) when being fired with an emergency fuel. For the purpose of this requirement, the term “emergency fuel” means a “fuel fired by a gas turbine only during circumstances, such as natural gas supply curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the gas turbine.” [40 CFR 60.332(k), 40 CFR 60.331(r)]

Monitoring and Testing Requirements

3. The permittee has elected not to monitor the total sulfur content of the gaseous fuel combusted in the turbine by combusting only the natural gas which meets the definition of natural gas in §60.331(u). The permittee shall use one of the following sources of information to make the required demonstration [40 CFR 60.334(h)(3)]:
 - (a) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
 - (b) Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required.
4. As specified in 40 CFR 60.13(e)(2), during each full unit operating hour, the CEMS on the gas turbine A-07 must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour, to validate the hour. For partial unit operating hours, at least one valid data point must be obtained for each quadrant of the hour in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one in each of two quadrants) are required to validate the hours. [40 CFR 60.334(b)(2) and 60.334(c)]
5. For purposes of identifying excess emissions, CEMS data must be reduced to hourly averages as specified in §60.13(h).
 - (i) For each unit operating hour in which a valid hourly average, as described in paragraph (b)(2) of this section, is obtained for both NO_x and diluent, the data acquisition and handling system must calculate and record the hourly NO_x emissions in the units of the applicable NO_x emission standard under §60.332(a), *i.e.*, percent NO_x by volume, dry basis, corrected to 15 percent O₂ and International Organization for Standardization (ISO) standard conditions (if required as given in §60.335(b)(1)). For any hour in which the hourly average O₂ concentration exceeds 19.0 percent O₂, a diluent cap value of 19.0 percent O₂ may be used in the emission calculations.

- (ii) A worst case ISO correction factor may be calculated and applied using historical ambient data. For the purpose of this calculation, substitute the maximum humidity of ambient air (H_o), minimum ambient temperature (T_a), and minimum combustor inlet absolute pressure (P_o) into the ISO correction equation. [40 CFR 60.334(b)(3) and 60.334(c)]
6. For performance tests conducted as required by this permit, sampling traverse points are to be selected following Method 20 or Method 1, (non-particulate procedures) and sampled for equal time intervals. The sampling shall be performed with a traversing single-hole probe or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points. [40 CFR 60.335(a)(4)]
 7. The permittee shall determine compliance with the applicable nitrogen oxides emission limitation in Condition II.A.2 and 40 CFR 60.332 and shall meet the performance test requirements of 40 CFR §60.8 as follows: [40 CFR 60.335(b)(1)]
 - (a) For each run of the performance test, the mean nitrogen oxides emission concentration (NO_{X_o}) corrected to 15 percent O_2 shall be corrected to ISO standard conditions using the following equation. Notwithstanding this requirement, use of the ISO correction equation is optional for: Lean premix stationary combustion turbines; units used in association with heat recovery steam generators (HRSG) equipped with duct burners; and units equipped with add-on emission control devices:

$$NO_X = (NO_{X_o})(P_r/P_o)^{0.5} e^{19(H_o - 0.00633)(288^\circ K/T_a)^{1.53}}$$

Where:

NO_X = emission concentration of NO_X at 15 percent O_2 and ISO standard ambient conditions, ppm by volume, dry basis,

NO_{X_o} = mean observed NO_X concentration, ppm by volume, dry basis, at 15 percent O_2 ,

P_r = reference combustor inlet absolute pressure at 101.3 kilopascals ambient pressure, mm Hg,

P_o = observed combustor inlet absolute pressure at test, mm Hg,

H_o = observed humidity of ambient air, g H_2O /g air,

e = transcendental constant, 2.718, and

T_a = ambient temperature, °K.

8. The 3-run performance test required by §60.8 must be performed within ± 5 percent at 30, 50, 75, and 90-to-100 percent of peak load or at four evenly-spaced load points in the normal operating range of the gas turbine, including the minimum point in the operating range and 90-to-100 percent of peak load, or at the highest achievable load point if 90-to-100 percent of peak load cannot be physically achieved in practice. If the turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel. Notwithstanding these requirements, performance testing is not required for any emergency fuel. [40 CFR 60.335(b)(2)]

II.D. Operational Flexibility

1. **Clean Air Act Section 502(b)(10) Changes** [40 CFR § 71.6(a)(13)(i)]
 - a. The permittee is allowed to make a limited class of changes under Section 502(b)(10) of the Clean Air Act within this permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions) and are not Title I modifications. This class of changes does not include:
 - i. Changes that would violate applicable requirements; or
 - ii. Changes that would contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
 - b. The permittee is required to send a notice to EPA at least 7 days in advance of any change made under this provision. The notice must describe the change, when it will occur and any change in emissions, and identify any permit terms or conditions made inapplicable as a result of the change. The permittee shall attach each notice to its copy of this permit.
 - c. Any permit shield provided in this permit does not apply to changes made under this provision.



Navajo Nation Environmental Protection Agency – Air Quality Control/Operating Permit Program
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Detailed Information

Permitting Authority: NNEPA

County: Apache **State:** Arizona **AFS Plant ID:** 04-001-N0611

Facility: El Paso Natural Gas Company - Window Rock Compressor Station

Document Type: MINOR PERMIT MODIFICATION- STATEMENT OF BASIS

MINOR PERMIT MODIFICATION
STATEMENT OF BASIS

El Paso Natural Gas Company
Window Rock Compressor Station
Permit No. NN OP 05-009-A

1. Facility Information

a. Permittee

El Paso Natural Gas Company - Window Rock Compressor Station
W 1/2 NE 1/4 Section 34, Township 26-N, Range 30-E
22 Miles West of Gallup, NM, Arizona

Mailing Address:

2 North Nevada Ave
Colorado Springs, Colorado 80903

Owner:

El Paso Natural Gas Company (EPNG)
2 North Nevada Avenue
Colorado Springs, Colorado 80903

b. Contact Information

Facility Contact: Richard Duarte, Environmental Representative
Phone: (505) 831-7763
Facsimile: (505) 831-7739

Responsible Official: Sam A. Armenta, Albuquerque Division Director
Phone: (505) 831-7772
Facsimile: (505) 831-7739

2. Request for Permit Revision

On October 18, 2010, NNEPA received a request from the permittee to revise Title V permit NN OP 05-009. In particular, the permittee requested the removal of the three

existing natural gas-fired auxiliary engines (AUX-01, AUX-02, and AUX-03) and the corresponding Condition II.D NESHAP Requirements (40 CFR Part 63 Subpart ZZZZ) from the permit, since these emission units have been permanently shutdown. The emission units are shutdown and inactive but are still located at the source. The permittee also requested the addition of two replacement Capstone microturbine packages consisting of a 1000 kW model C1000 (which consists of five C200 units in a package) and a 600 kW model C600 (which consists of three C200 units in a package) to the permit. The permittee has designated the replacement units AUX B-04 through AUX B-11 to represent the eight C200 units.

a. Minor Permit Modification

Pursuant to 40 CFR 71.7(e)(1)(i)(A) minor permit modification procedures may be used only for those permit modifications that:

- (1) Do not violate any applicable requirement;

The removal of the existing auxiliary engines and addition of the microturbines does not violate any applicable requirement.

- (2) Do not involve significant changes to the existing monitoring, reporting or recordkeeping requirements in the permit;

The removal of the existing auxiliary engines prompts the removal of NESHAP 40 CFR 63 Subpart ZZZZ requirements from the permit. There will be no other changes to monitoring, reporting, or recordkeeping requirements in the permit.

- (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;

No case-by-case determination of an emission limitation or other standard, source-specific determination of ambient impacts, or visibility or increment analysis is required. The existing auxiliary engines and the corresponding NESHAP 40 CFR 63 Subpart ZZZZ requirements will be removed from the permit.

- (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 in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

- i. A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of title I; and
- ii. An alternative emission limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act;

The source has not assumed any permit terms or conditions to avoid any applicable requirements. This source is an existing major source under the PSD program and NESHAP requirements for the auxiliary engines will be deleted from the permit as the engines are permanently shutdown. The permittee has no alternative emission limit under section 112(i)(5) of the Act.

- (5) Are not modifications under any provisions of Title 1 of the Act;

The change is not a Title 1 modification. The source is an existing major source under the PSD program. This project is not a major modification under the PSD program because it does not result in a significant emission increase as defined in 40 CFR 52.21(b)(23)(i).

- (6) Are not required to be processed as a significant modification

The modification is a minor modification because it does not trigger any of the exclusions listed above.

3. Permitted Emission Units and Control Equipment

Unit ID/ Stack ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
A-01 through A-06	Six (6) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp (each)	1958	N/A
A-07	One (1) natural gas-fired simple-cycle turbine, Solar Centaur 50-T5502. This unit is equipped with a NOx CEM.	42.3 MMBtu/hr 4,530 hp	1992	Dry Low-NOx combustion
B-01	One (1) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp	1959	N/A
B-02 and B-03	Two (2) natural gas-fired engines, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp (each)	1960	N/A
B-04	One (1) natural gas-fired engine, Worthington SUTC-1610	19.0 MMBtu/hr 2,500 hp	1964	N/A
B-05	One (1) natural gas-fired engine, Worthington SUTC-1610	20.5 MMBtu/hr 2,700 hp	1964	N/A
B-06	One (1) natural gas-fired engine, Worthington ML-10	21.3 MMBtu/hr 2,800 hp	1966	N/A
AUX B-04 through AUX B-11	Two (2) Capstone microturbine packages (consisting of eight (8) C200 units) for auxiliary power	18.2 MMBtu/hr 2145 hp (ISO) (total)	2009	N/A

4. Potential to Emit

Potential to emit (PTE) means the maximum capacity to emit any air pollutant (Clean Air Act criteria pollutants or hazardous air pollutants) under its physical and operational design. Any physical or operational limitations on the maximum capacity of this plant to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, may

be treated as a part of its design if the limitation is enforceable by US EPA or NNEPA. Actual emissions are typically lower than PTE. NNEPA has revised the Potential to Emit to reflect the permittee's safety factors, updated emissions factors based on testing, revised AP-42 factors for the facility and to incorporate emissions from replacement units AUX B-04 through AUX B-11. Please see Appendix A (pages 1 through 5) for detailed calculations.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	NO _x	VOC	CO	HAPs
Engines A-01 through A-06	23.0	28.9	0.35	1,955	71.9	1,293	36.3
Engine A-07	0.42	1.47	0.76	26.7	7.88	22.3	0.2
Engines B-01 through B-06	19.8	29.9	0.36	2,018	74.3	1,189	37.5
Microturbines AUX B-04 through AUX B-11	0.19	0.66	0.34	3.62	0.88	9.58	0.08
Insignificant Activities*	Less than 5.00	Less than 5.00	-	-	Less than 5.00	-	Negligible
PTE of the Entire Source	48.4	66.0	1.81	4,004	160	2,513	74
Title V Major Source Thresholds	NA	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

*Note: This is an estimate of the PM/PM10 emissions from the fugitive VOC and PM emissions from equipment leaks, blowdown, and pressure relief valves.

5. Federal Rule Applicability

a. New Source Performance Standard (NSPS) for Stationary Combustion Turbines (40 CFR 60.4230-4248, Subpart KKKK):

On December 21, 2009, EPNG replaced the three natural gas-fired auxiliary engines with eight natural gas microturbines (AUX B-04 through AUX B-11). A stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005 is subject to this subpart. Since the heat input of each individual microturbine is 2.3 MMBtu/hr, pursuant to 40 CFR 60.4305(a) the turbines AUX B-04 through AUX B-11 are not subject to the requirements of NSPS, Subpart KKKK.

b. NESHAP for Combustion Turbines (40 CFR 63.6080-63.6175, Subpart YYYY):

The eight natural gas microturbines (AUX B-04 through AUX B-11) at this source were constructed after January 14, 2003 and are considered new stationary combustion turbines under this NESHAP, pursuant to 40 CFR 63.6090(a)(2). This source is considered a major source of HAP emissions pursuant to 60.6085(b). Pursuant to 40 CFR 63.6090(b)(3), an existing, new or reconstructed stationary combustion turbine with a rated peak power output of less than 1.0 megawatt

(MW) at ISO standard day conditions , which is located at a major source, does not have to meet the requirements of this subpart and of subpart A of this part. Since the power output of individual microturbines is 0.2 MW, pursuant to 40 CFR 63.6090(b)(3), turbines AUX B-04 through AUX B-11 are not subject to the requirements of NESHAP, Subpart YYYY, and no initial notification is necessary.

6. Summary of Applicable Federal Requirements

Federal Air Quality Requirement	Current or Future Requirement
PSD Permit AZP 90-1	Current
NSPS, Subpart GG	Current
Asbestos NESHAP (40 CFR 61, Subpart M)	Current
Protection of Stratospheric Ozone (40 CFR 82)	Current