



NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY

Office of the Executive Director

Post Office Box 339, Window Rock, AZ 86515

Telephone (928) 871-7692, Fax (928) 871-7996



Dr. Joe Shirley, Jr.
PRESIDENT

OCT 12 2010

Ben Shelley
VICE PRESIDENT

Deborah Jordan, Director
Air Division
US EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Final Title V Permit for Transwestern Pipeline Company - Klagetoh Compressor Station

Dear Ms. Jordan:

Enclosed is a copy of the Final Permit and Statement of Basis for Transwestern Pipeline Company - Klagetoh Compressor Station Number 4, located at Section 18, Township 25-N, Range 28-E 10 miles northeast of Klagetoh, Arizona on the Navajo Nation. The Navajo Nation EPA (NNEPA) intends to issue this permit in accordance with the provisions of Title V of the Clean Air Act, 40 CFR Part 71, the Navajo Nation Operating Permit Regulations, the 2004 Delegation Agreement between EPA Region IX and NNEPA, and all other applicable rules and regulations. The Permittee, Transwestern Pipeline Company - Klagetoh Compressor Station Number 4, is authorized to operate air emission units and to conduct other air pollutant-emitting activities in accordance with the permit conditions listed in this permit.

Notice of the draft permit was published in several local newspapers beginning on August 6, 2010 and ending on September 7, 2010. NNEPA also sent out Affected State letters to the Arizona Department of Environmental Quality, New Mexico Environment Department, Utah Department of Environmental Quality, Ute Mountain Tribe, Southern Ute Indian Tribe, Hopi Tribe, Hualapai Tribe, and White Mountain Apache Tribe. NNEPA also posted the draft permit on the NNEPA website. NNEPA received no request for public hearing and no comments during this period.

A copy of the final permit will be on file with the Operating Permit Program and on NNEPA's website at: www.navajonationepa.org/airqty/permits.

If you have any questions or comments regarding this action, please contact Charlene Nelson at 928-729-4247.

Stephen B. Etsitty
Executive Director
Navajo Nation Environmental Protection Agency

cc: Gerardo Rios, US EPA Region IX

Transwestern Pipeline Company- Klargetoh Compressor Station # 4

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TITLE V PERMIT TO OPERATE

<u>PERMIT #:</u> NN OP 09-002	<u>FACILITY NAME:</u> TRANSWESTERN PIPELINE COMPANY - KLAGETOH COMPRESSOR STATION NUMBER 4	<u>LOCATION:</u> KLAGETOH	<u>COUNTY:</u> APACHE	<u>STATE:</u> AZ
<u>ISSUE DATE:</u> 10/12/2010	<u>EXPIRATION DATE:</u> 10/12/2015	<u>AFS PLANT ID:</u> 04-001-N0106	<u>PERMITTING AUTHORITY:</u> NNEPA	

ACTION/STATUS: PART 71 OPERATING PERMIT RENEWAL ISSUANCE

Jeff Whippo, Director of Operations
 Transwestern Pipeline Company
 4001 Indian School Road, Suite 250
 Albuquerque, NM 87110

Re: Issuance of Title V Operating Permit Renewal to Transwestern
 Pipeline Company- Klagetoh Compressor Station Number 4

Dear Mr. Whippo:

This Permit is being issued and administered by the Navajo Nation EPA (NNEPA) pursuant to the Delegation Agreement between EPA Region IX and NNEPA, dated October 15, 2004. This permit authorizes the Permittee, Transwestern Pipeline Company- Klagetoh Compressor Station Number 4, to operate air pollutant-emitting activities in accordance with the permit conditions listed in this permit and the provisions of Title V of the Clean Air Act, 40 C.F.R. Part 71, Navajo Nation Operating Permit Regulations, and all other applicable rules and regulations.

Terms and conditions not otherwise defined in this permit have the same meaning as assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable under the Clean Air Act by NNEPA and by U.S. EPA, as well as citizens, under either or both the Navajo Nation Clean Air Act and the Clean Air Act, as applicable.

This permit is valid for a period of five (5) years and shall expire at midnight on the date five (5) years after the date of issuance unless a timely and complete renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration. The permit number cited above should be referenced in future correspondence regarding this facility.

OCT 12 2010

 Date

 Stephen B. Etsitty
 Executive Director
 Navajo Nation Environmental Protection Agency

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
CFR	Code of Federal Regulations
EIP	Economic Incentives Program
gal	gallon
HAP	Hazardous Air Pollutant
hp	horsepower
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
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
RMP	Risk Management Plan
SNAP	Significant New Alternatives Program
SO ₂	Sulfur Dioxide
TPY	tons per year
TSP	Total Suspended Particulate
U.S. EPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds

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I. Source Identification

- Company Name: Transwestern Pipeline Company
- Company Mailing Address: 4001 Indian School Road, Suite 250
Albuquerque, New Mexico 87110
- Plant Name: Transwestern Pipeline Company -
Klagetoh Compressor Station Number 4
- Plant Location: Section 18, Township 25-N
Range 28-E, 10 miles Northeast of Klagetoh, AZ
- County: Apache, Arizona
- EPA Region: 9
- Reservation: Navajo Nation
- Tribe: Navajo
- Company Contact: Larry Campbell Phone: (575) 625-8022
- Responsible Official: Jeff Whippo Phone: (505) 260-4006
- EPA Contact: Roger Kohn Phone: (415) 972-3973
- Tribal Contacts: Charlene Nelson Phone: (928) 729-4247
Anoop Sukumaran Phone: (928) 729-4094
- SIC Code: 4922
- AFS Plant Id. No.: 04-001-N0106
- 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
401	Clark TVC-12 Reciprocating Compressor Engine	34.65 MMBtu/hr 4,500 hp	1967	N/A
402	Clark TVC-12 Reciprocating Compressor Engine	34.65 MMBtu/hr 4,500 hp	1967	N/A
403	Clark TVC-12 Reciprocating Compressor Engine	34.65 MMBtu/hr 4,500 hp	1967	N/A
421	Waukesha F3520GU Reciprocating Engine	3.38 MMBtu/hr 450 hp	1967	N/A
422	Waukesha F3520GU Reciprocating Engine	3.38 MMBtu/hr 450 hp	1967	N/A

II. Requirements for Specific Units: None

III. Facility-Wide or Generic Permit Requirements

Conditions in this section of the permit apply to all emissions units located at the facility.
[See 40 CFR § 71.6(a)(1)]

III.A. Testing Requirements [40 CFR § 71.6(a)(3)] [NNOPR § 302(E)] [The NNOPR provision is enforceable by NNEPA only.]

The Permittee shall comply with the following generally applicable testing requirements as necessary to ensure that the required tests are sufficient for compliance purposes:

1. Submit to U.S. EPA Region 9 and NNEPA a source test plan 30 days prior to any required testing. The source test plan shall include and address the following elements:
 - 1.0 Purpose of the Test
 - 2.0 Source Description and Mode of Operation During Test
 - 3.0 Scope of Work Planned for Test
 - 4.0 Schedule/Dates
 - 5.0 Process Data To Be Collected During Test
 - 6.0 Sampling and Analysis Procedures
 - 6.1 Sampling Locations
 - 6.2 Test Methods
 - 6.3 Analysis Procedures and Laboratory Identification
 - 7.0 Quality Assurance Plan
 - 7.1 Calibration Procedures and Frequency
 - 7.2 Sample Recovery and Field Documentation
 - 7.3 Chain of Custody Procedures
 - 7.4 QA/QC Project Flow Chart
 - 8.0 Data Processing and Reporting
 - 8.1 Description of Data Handling and QC Procedures
 - 8.2 Report Content
2. Unless otherwise specified by an applicable requirement or permit condition in Section II, all source tests shall be performed at maximum available operating rates (90% to 110%) of device design capacity.
3. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test. No adjustments are to be made within two hours of the start of the tests. Any operating adjustments made during a source test, that are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
4. During each test run and for two hours prior to the test and two hours after the completion of the test, the Permittee shall record the following information:
 - a. Fuel characteristics and/or amount of product processed (if applicable).
 - b. Visible emissions.
 - c. All parametric data which is required to be monitored in Section II for the emission unit being tested.
 - d. Other source specific data identified in Section II such as minimum test length (e.g., one hour, 8 hours, 24 hours, etc.), minimum sample volume, other operating conditions to be monitored, correction of O₂, etc.
5. Each source test shall consist of at least three valid test runs and the emission results shall be reported as the arithmetic average of all valid test runs and in the terms of the emission limit. There must be at least three valid test runs, unless otherwise specified.

6. Source test reports shall be submitted to U.S. EPA Region 9 and NNEPA within 60 days of completing any required source test.

III.B. Recordkeeping Requirements [40 CFR § 71.6 (a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. The Permittee shall keep records of required monitoring information that include the following:
 - a. The date, place, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
2. The Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
3. 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 Part 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. [40 CFR § 71.6(a)(3)(ii), 40 CFR § 60.7(f)]

III.C. Reporting Requirements [40 CFR § 71.6 (a)(3)(iii)] [NNOPR § 302(G)] [The NNOPR provision is enforceable by NNEPA only.]

The Permittee shall comply with the following generally applicable reporting requirements:

1. The Permittee shall submit to NNEPA reports of any monitoring required under 40 CFR § 71.6(a)(3)(i)(A), (B), or (C) each six-month reporting period from January 1 to June 30 and from July 1 to December 31. All reports shall be submitted to NNEPA and shall be postmarked by the 30th day following the end of the reporting period. All instances of deviations from permit requirements must be clearly identified in such

reports. All required reports must be certified by a responsible official consistent with Condition IV.E of this permit.

- a. A monitoring report under this section must include the following:
 - i. The company name and address.
 - ii. The beginning and ending dates of the reporting period.
 - iii. The emissions unit or activity being monitored.
 - iv. The emissions limitation or standard, including operational requirements and limitations (such as parameter ranges), specified in the permit for which compliance is being monitored.
 - v. All instances of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, and including exceedances as defined under 40 CFR Part 64, and the date on which each deviation occurred.
 - vi. If the permit requires continuous monitoring of an emissions limit or parameter range, the report must include the total operating time of the emissions unit during the reporting period, the total duration of excess emissions or parameter exceedances during the reporting period, and the total downtime of the continuous monitoring system during the reporting period.
 - vii. If the permit requires periodic monitoring, visual observations, work practice checks, or similar monitoring, the report shall include the total time when such monitoring was not performed during the reporting period and at the source's discretion either the total duration of deviations indicated by such monitoring or the actual records of deviations.
 - viii. All other monitoring results, data, or analyses required to be reported by the applicable requirement.
 - ix. The name, title, and signature of the responsible official who is certifying to the truth, accuracy, and completeness of the report.
- b. Any report required by an applicable requirement that provides the same information described in subparagraphs III.C(1)(a)(i) through (ix) above shall satisfy the requirement under III.C(1)(a).
- c. "Deviation," means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with 40 CFR § 71.6(a)(3)(i) and (ii). For a situation lasting more than 24 hours, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- i. A situation when emissions exceed an emission limitation or standard;
 - ii. A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met;
 - iii. A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or
 - iv. A situation in which an exceedance, as defined in the compliance assurance plan (40 CFR Part 64), occurs.
2. The Permittee shall promptly report to NNEPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. “Promptly” is defined as follows:
 - a. Any definition of “prompt” or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit;
 - b. Where the underlying applicable requirement does not define prompt or provide a timeframe for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - i. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
 - ii. For emissions of any regulated pollutant, excluding a hazardous air pollutant or a toxic air pollutant, that continue for more than 2 hours in excess of permit requirements, the report must be made within 48 hours.
 - iii. For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report required in subsection III.C(1) of this permit.
3. If any of the Conditions in III.C(2)(b)(i) or (ii) of this permit are met, the source must notify the permitting authority by telephone, facsimile, or electronic mail sent to NNEPA, based on the timetable listed. A written notice, certified consistent with subsection III.C(4) of this permit, must be submitted to NNEPA within 10 working days of the occurrence. All deviations reported under this section must also be identified in the 6-month report required under subsection III.C(1) of this section.
4. Any application form, report, or compliance certification required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

III.D. Stratospheric Ozone and Climate Protection [40 CFR Part 82]

1. The Permittee shall comply with the standards for labeling products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a. All containers in which a Class I or Class II substance is stored or transported, all products containing a Class I substance, and all products directly manufactured with a Class I substance, must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR § 82.106.
 - b. The placement of the required warning statement must comply with the requirements of 40 CFR § 82.108.
 - c. The form of the label bearing the required warning statement must comply with the requirements of 40 CFR § 82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR § 82.112.
2. The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR § 82.156.
 - b. Equipment used during maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR § 82.166. (“MVAC-like appliance” is defined at 40 CFR § 82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of when the refrigerant was purchased and added to such appliances, pursuant to 40 CFR § 82.166(k).
3. If the Permittee manufactures, transforms, destroys, imports, or exports a Class I or Class II substance, the Permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

4. If the Permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5. The Permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

III.E. Asbestos from Demolition and Renovation [40 CFR Part 61, Subpart M]

The Permittee shall comply with the requirements of Section 61.140 through .157 of the National Emission Standard for Asbestos for all demolition and renovation projects. [40 CFR Part 61, Subpart M]

III.F. Compliance Schedule [40 CFR §§ 71.5(c)(8)(iii) and 71.6(c)(3)]

1. For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.
2. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

IV. Title V Administrative Requirements

IV.A. Fee Payment [NNOPR Subpart VI] [The NNOPR provision is enforceable by NNEPA only.]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below. [NNOPR §§ 603(A), (B)]
 - a. The Permittee shall pay the annual permit fee by July 21 of each year.
 - b. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of Navajo Nation EPA Air Quality Control Program.
 - c. The Permittee shall send the fee payment and a completed fee filing form to:

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

2. The Permittee shall submit a fee calculation worksheet form with the annual permit fee by July 21 of each year. Calculations of actual or estimated emissions and calculation of the fees owed shall be computed on the fee calculation worksheets provided by the EPA. Fee payment of the full amount must accompany each fee calculation worksheet. [NNOPR § 603(A)]
3. The fee calculation worksheet shall be certified by a responsible official consistent with 40 CFR § 71.5(d).
4. Basis for calculating annual fee:

The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all fee pollutants emitted from the source by the applicable emissions fee (in dollars/ton) in effect at the time of calculation. Emissions of any regulated air pollutant that already are included in the fee calculation under a category of regulated pollutant, such as a federally listed hazardous air pollutant that is already accounted for as a VOC or as PM10, shall be counted only once in determining the source's actual emissions. [NNOPR §§ 602(A), (B)(1)]

- a. "Actual emissions" means the actual rate of emissions in TPY of any fee pollutant emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year. Actual emissions shall not include emissions of any one fee pollutant in excess of 4,000 TPY, or any emissions that come from insignificant activities. [NNOPR §§ 602(B)(1), 102(5)]
 - b. Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.
 - c. If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.
 - d. The term "fee pollutant" is defined in NNOPR Subpart I § 102(24).
 - e. The term "regulated air pollutant" is defined in NNOPR § 102(50), except that for purposes of this permit the term does not include any pollutant that is regulated solely pursuant to 4 N.N.C. § 1121, nor does it include any hazardous air pollutant designated by the Director pursuant to 4 N.N.C. § 1126(B).
 - f. The Permittee should note that the applicable fee is revised each year to account for inflation, and this revised figure is available from NNEPA starting on March 1 of each year.
 - g. The total annual fee due shall be the greater of the applicable minimum fee and the sum of subtotal annual fees for all fee pollutants emitted from the source. [NNOPR Subpart VI § 602(B)(2)]
5. The Permittee shall retain, in accordance with the provisions of 40 CFR § 71.6(a)(3)(ii), all fee calculation worksheets and other emissions-related data used to

determine fee payment for 5 years following submittal of fee payment. Emission-related data include, for example, emissions-related forms provided by NNEPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR § 71.6(a)(3)(ii).

6. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with NNOPR § 603(C).
7. When notified by NNEPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.
8. A Permittee who thinks an NNEPA assessed fee is in error and wishes to challenge such fee, shall provide a written explanation of the alleged error to NNEPA along with full payment of the NNEPA assessed fee. [40 CFR § 71.9(j)(3)]

IV.B. Blanket Compliance Statement [CAA §§ 113(a) and (e)(1), 40 CFR §§ 51.212, 52.12, 52.33, 60.11(g), 71.6(a)(6)(i) and (ii)]

1. The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance, including, but not limited to, violation of any applicable requirement; any permit term or condition; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any regulation or order issued by the permitting authority pursuant to this part constitutes a violation of the CAA and is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [40 CFR §§ 71.6(a)(6)(i) and (ii)]
2. Determinations of deviations, continuous or intermittent compliance status, or violations of this permit are not limited to the applicable testing or monitoring methods required by the underlying regulations or this permit; other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered in such determinations. [CAA §§ 113(a) and (e)(1), 40 CFR §§ 51.212, 52.12, 52.33, 60.11(g)]

IV.C. Compliance Certifications [40 CFR § 71.6(c)(5)] [NNOPR § 302(I)] [The NNOPR provision is enforceable by NNEPA only.]

1. The Permittee shall submit to NNEPA and U.S. EPA Region 9 a semi-annual certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, postmarked by January 30th and July 30th of each year and covering the previous six months. The compliance certification shall be certified as to truth, accuracy, and completeness by the permit-designated responsible official consistent with Section IV.E. of this permit and 40 CFR § 71.5(d).
2. The certification shall include the following:

- a. Identification of each permit term or condition that is the basis of the certification.
- b. Identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period.

If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with CAA § 113(c)(2), which prohibits knowingly making a false certification or omitting material information.

- c. The compliance status of each term and condition of the permit for the period covered by the certification based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification.
- d. Whether compliance with each permit term was continuous or intermittent.

IV.D. Duty to Provide and Supplement Information [40 CFR §§ 71.6(a)(6)(v), 71.5(b)] [NNOPR § 301(E)] [The NNOPR provision is enforceable by NNEPA only.]

The Permittee shall furnish to NNEPA, within a reasonable time, any information that NNEPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to NNEPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. (Such information may be provided to U.S. EPA 9 only, pursuant to 40 CFR § 71.6(a)(6)(v), at the Permittee's discretion.) Information claimed to be confidential should be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit to the permitting authority such supplementary facts or corrected information. The Permittee shall also provide additional information to the permitting authority as necessary to address any requirements that become applicable to the facility after this permit is issued.

IV.E. Submissions [40 CFR §§ 71.5(d), 71.6] [NNOPR § 702] [The NNOPR provision is enforceable by NNEPA only.]

Any document required to be submitted with this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. All documents required to be submitted, including reports, test data, monitoring data, notifications, compliance certifications, fee calculation worksheets, and applications for renewals and permit modifications shall be submitted to NNEPA and U.S. EPA Region 9, as applicable, at the respective addresses below:

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

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

IV.F. Severability Clause [40 CFR § 71.6(a)(5)]

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

IV.G. Permit Actions [40 CFR § 71.6(a)(6)(iii)] [NNOPR § 406] [The NNOPR provision is enforceable by NNEPA only.]

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

IV.H Administrative Permit Amendments [40 CFR § 71.7(d)] [NNOPR § 405(C)] [The NNOPR provision is enforceable by NNEPA only.]

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

1. Corrects typographical errors.
2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source.
3. Requires more frequent monitoring or reporting by the Permittee.
4. Allows for a change in ownership or operational control of a source where NNEPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to NNEPA.
5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR §§ 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR § 71.6.

6. Incorporates any other type of change which NNEPA has determined to be similar to those listed above in paragraphs (1) through (5).

IV.I. Minor Permit Modifications [40 CFR § 71.7(e)(1)] [NNOPR § 405(D)] [The NNOPR provision is enforceable by NNEPA only.]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:
 - a. Do not violate any applicable requirement.
 - b. Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit.
 - c. Do not require or change a case-by-case determination of an emissions limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.
 - d. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - i. A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of CAA Title I; and
 - ii. An alternative emissions limit approved pursuant to regulations promulgated under CAA § 112(i)(5).
 - iii. Are not modifications under any provision of CAA Title I.
 - iv. Are not required to be processed as a significant modification.
2. Notwithstanding the list of changes eligible for minor permit modification procedures in paragraph (1) above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by EPA.
3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR § 71.5(c) and shall include the following:
 - a. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
 - b. The source's suggested draft permit;

- c. Certification by a responsible official, consistent with 40 CFR § 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
 - d. Completed forms for the permitting authority to use to notify affected States and the Administrator as required under 40 CFR § 71.8.
4. The Permittee may make the change proposed in its minor permit modification application immediately after it files such application. After the Permittee makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR §§ 71.7(e)(1)(iv)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, however, the existing permit terms and conditions it seeks to modify may be enforced against it.
 5. The permit shield under 40 CFR § 71.6(f) may not extend to minor permit modifications.

IV.J. Significant Permit Modifications [40 CFR § 71.7(e)(3)] [NNOPR § 405(E)] [The NNOPR provision is enforceable by NNEPA only.]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:
 - a. Do not qualify as minor permit modifications or as administrative amendments.
 - b. Are significant changes in existing monitoring permit terms or conditions.
 - c. Are relaxations of reporting or recordkeeping permit terms or conditions.
2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.
3. The Permittee must meet all requirements of Part 71 for applications for significant permit modifications. Specifically, for the application to be determined complete, the Permittee must supply all information that is required by 40 CFR § 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change. [40 CFR §§ 71.7(e)(3)(ii), 71.5(a)(2)]

IV.K. Reopening for Cause [40 CFR § 71.7(f)] [This permit condition is enforceable by U.S. EPA only.]

1. U.S. EPA shall reopen the permit prior to expiration under any of the following circumstances:
 - a. Additional requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years.
 - b. U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - c. NNEPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. U.S. EPA shall notify NNEPA and the Permittee, in writing, when such cause exists to reopen and revise the permit.
3. NNEPA and U.S. EPA will revise the reopened permit in accordance with 40 C.F.R. §§ 71.7(g)(2)-(5).

IV.L. Reopening for Cause [NNOPR § 406] [This provision is enforceable by NNEPA only.]

1. NNEPA shall reopen the permit prior to expiration under any of the following circumstances:
 - a. Additional requirements under the Clean Air Act become applicable to a major Part 71 source with a remaining permit term of three or more years.
 - b. NNEPA or USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - c. NNEPA or USEPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
2. NNEPA will revise the reopened permit in accordance with NNOPR § 406(A)(2) and (4), (B).

IV.M. Property Rights [40 CFR § 71.6(a)(6)(iv)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

IV.N. Inspection and Entry [40 CFR § 71.6(c)(2)]

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives from NNEPA and U.S. EPA Region 9 to perform the following:

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

IV.O. Emergency Provisions [40 CFR § 71.6(g)]

1. In addition to any emergency or upset provision contained in any applicable requirement, the Permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the Permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. an emergency occurred and that the Permittee can identify the cause(s) of the emergency;
 - b. the permitted facility was at the time being properly operated;
 - c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and
 - d. the Permittee submitted notice of the emergency to EPA within two working days of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirements of Condition III.C(2) of this permit.
 - e. In any enforcement proceeding, the Permittee attempting to establish the occurrence of an emergency has the burden of proof.
2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emissions limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

IV.P. Transfer of Ownership or Operation [40 CFR § 71.7(d)(1)(iv)]

A change in ownership or operational control of this facility may be treated as an administrative permit amendment if the NNEPA determines no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to NNEPA.

IV.Q. Off-Permit Changes [40 CFR § 71.6(a)(12)] [NNOPR § 404(B)] [The NNOPR provision is enforceable by NNEPA only.]

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

1. Each change is not addressed or prohibited by this permit;
2. Each change must comply with all applicable requirements and may not violate any existing permit term or condition;
3. Changes under this provision may not include changes or activities subject to any requirement under Title IV or that are modifications under any provision of the CAA Title I;
4. The Permittee must provide contemporaneous written notice to NNEPA and U.S. EPA Region 9 of each change, except for changes that qualify as insignificant activities under 40 CFR § 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted and any applicable requirements that would apply as a result of the change; and
5. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes.

IV.R. Permit Expiration and Renewal [40 CFR §§ 71.5(a)(1)(iii), 71.6(a)(11), 71.7(b), 71.7(c)(1)(i) and (ii), 71.8(d)]

1. This permit shall expire upon the earlier occurrence of the following events:
 - a. up to twelve years elapse from the date of issuance to a solid waste incineration unit combusting municipal waste subject to standards under CAA § 129; or
 - b. for sources other than those identified in paragraph IV.R(1)(a) above, five years elapse from the date of issuance; or
 - c. the source is issued a Part 70 permit by an EPA-approved permitting authority.
2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted on or before a date 6 months, but not more than 18 months, prior to the date of expiration of this permit.

3. If the Permittee submits a timely and complete permit application for renewal consistent with 40 CFR § 71.5(a)(2), but the permitting authority has failed to issue or deny the renewal permit, the permit shall not expire until the renewal permit has been issued or denied.
4. The Permittee's failure to have a current Part 71 permit is not a violation of this part until NNEPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by NNEPA.
5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected State, and tribal review.
6. The application for renewal shall include the current permit number, description of permit revisions and off-permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application.



NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY
Office of the Executive Director
Post Office Box 339, Window Rock, AZ 86515
Telephone (928) 871-7692, Fax (928) 871-7996



Detailed Information

Permitting Authority: NNEPA

County: Apache **State:** Arizona **AFS Plant ID:** 04-001-N0106

Facility: Transwestern Pipeline Company - Klagetoh Compressor Station Number 4

Document Type: FINAL STATEMENT OF BASIS

**PART 71 FEDERAL OPERATING PERMIT
STATEMENT OF BASIS**

**Transwestern Pipeline Company
Klagetoh Compressor Station Number 4**

Permit No. NN OP 09-002

1. Facility Information

a. Permittee

Plant Name:

Transwestern Pipeline Company - Klagetoh Compressor Station Number 4
Section 18, Township 25-N, Range 28-E
10 miles northeast of Klagetoh, Arizona

Mailing Address:

4001 Indian School Road, Suite 250
Albuquerque, New Mexico 87110

Owner:

Energy Transfer Partners
711 Louisiana Avenue, Suite 900
Houston, Texas 77002

b. Contact Information

Facility Contact: Larry Campbell, Environmental Representative
Phone: (575) 625-8022

Responsible Official: Jeff Whippo, Director of Operations
Phone: (505) 260-4006

c. Description of Operations, Products

The facility is a natural gas compressor station which performs gas inlet separation and natural gas compression.

d. History

This source is an existing natural gas compressor station consisting of inlet separation and natural gas compression. This plant was initially constructed in 1967 to provide gas compression for a natural gas pipeline. The facility has three reciprocating engine-driven natural gas-fired compressors (Clark TVC-12, units 401, 402, and 403) and two reciprocating engines (Waukesha F3520GU, units 421 and 422) for power generation. Since the equipment pre-dated U.S. EPA's New Source Review construction permit rules, equipment was grandfathered from pre-construction permitting requirements. In 2001, Transwestern Pipeline Company applied for a proposed significant modification to replace the three existing Clark reciprocating engines with a single natural gas-fired GE LM 2500 turbine, and replace the two existing Waukesha generator engines with two caterpillar G3508 generator engines. U.S.EPA issued a significant modification to install the new turbine and the power generators on November 11, 2001. Transwestern Pipeline Company did not implement the proposed modification project. The facility also has three 5,000 hp electric motor driven compressors which are not emission units.

The source has been operating under Part 71 Operating Permit NN-OP 99-01, issued on April 25, 2000, and the following approvals:

- (i) First Administrative Amendment, issued by NNEPA on January 14, 2005.
- (ii) First Renewed Title V permit, issued by NNEPA on September 22, 2005.
- (iii) Second Administrative Amendment, issued by NNEPA on March 17, 2010.

This Title V renewal permit application was submitted on November 11, 2009.

e. Existing Approvals

This Part 71 permit renewal incorporates all conditions from previous approvals.

f. Permitted Emission Units and Control Equipment

Unit ID/ Stack ID	Unit Description	Maximum Capacity	Commenced Construction Date	Control Device
401	Clark TVC-12 Reciprocating Compressor Engine	34.65 MMBtu/hr 4,500 hp	1967	N/A
402	Clark TVC-12 Reciprocating Compressor Engine	34.65 MMBtu/hr 4,500 hp	1967	N/A
403	Clark TVC-12 Reciprocating Compressor Engine	34.65 MMBtu/hr 4,500 hp	1967	N/A
421	Waukesha F3520GU Reciprocating Engine	3.38 MMBtu/hr 450 hp	1967	N/A
422	Waukesha F3520GU Reciprocating Engine	3.38 MMBtu/hr 450 hp	1967	N/A

g. Unpermitted Emission Units and Control Equipment

No unpermitted emission units were found to be operating at this source during this review process.

h. New Emission Units and Control Equipment

This Part 71 operating permit renewal includes no new emission units or pollution control equipment.

i. Insignificant Activities

This stationary source also includes the following insignificant activities as defined in 40 CFR § 71.5(c)(11)(ii), which is defined as emission units with potential to emit of each criteria pollutant less than 2 TPY and potential to emit a single HAP less than 0.5 TPY or the de minimis level established under CAA § 112(g), whichever is less:

- (i) Fugitive VOC emissions from connections, flanges, open-ended lines, valves, and other components.
- (ii) Emergency shutdown system and pressure relief valves.
- (iii) Blowdown activities (during startup and shutdown).
- (iv) Fire Pump and Air Compressor engine emissions.
- (v) Any emissions unit, operation, or activity that handles or stores a VOC or HAP organic liquid with a vapor pressure less than 1.5 psia.

(vi) List of storage tanks present at the source.

Unit ID	Unit Description
T-1	210 barrel vertical fixed roof lube oil storage tank
T-2	210 barrel vertical fixed roof lube oil storage tank
T-3	3,000 gal vertical fixed roof waste lube oil storage tank
T-4	65 barrel vertical fixed roof ethylene glycol storage tank
T-5	65 barrel vertical fixed roof ethylene glycol storage tank
T-6	65 barrel vertical fixed roof ethylene glycol storage tank
T-7	400 barrel vertical fixed roof oily waste water storage tank
T-8	210 barrel vertical fixed roof oily waste water storage tank
T-9	500 barrel vertical fixed roof pipeline liquid storage tank

j. Enforcement Issues

There are no known noncompliance issues that must be addressed in this permitting action. Therefore, the renewal may be proposed and issued.

k. Emission Calculations

See Appendix A of this document for detailed calculations (pages 1 through 3).

l. Potential to Emit

Potential to emit (PTE) means the maximum capacity to emit any air pollutant (CAA criteria pollutants or HAPs) under a facility's 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 U.S. EPA. Actual emissions are typically lower than PTE.

Process/Facility	Potential to Emit (tons/year)							
	PM	PM-10	PM-2.5	SO ₂	NO _x	VOC	CO	HAPs
401	5.99	7.53	7.53	0.09	343.04	14.31	118.51	11.72
402	5.99	7.53	7.53	0.09	343.04	14.31	118.51	11.72
403	5.99	7.53	7.53	0.09	343.04	14.31	118.51	11.72
421	0.15	0.29	0.29	0.01	33.61	0.44	51.96	0.45
422	0.15	0.29	0.29	0.01	33.61	0.44	51.96	0.45
Insignificant Activities*	less than 5.00	less than 5.00	less than 5.00	-	-	less than 5.00	-	negligible
PTE of the Entire Source	23.3	28.2	28.2	0.29	1096	49	459	36
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

Note: (*) This estimates the PM10/PM2.5 emissions from the blowdown, pressure relief systems, and the fugitive VOC emissions from equipment leaks.

- (i) PTE of NO_x and CO are equal to or greater than 100 TPY. In addition, the PTE of HAPs from this source is greater than 10 TPY for a single HAP and greater than 25 TPY for total HAPs. Therefore, this source is considered a major source under 40 CFR Part 71 (Federal Operating Permit Program).

m. Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2008 emission inventory data submitted by the Permittee.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM10	14
SO ₂	0.17
VOC	26.72
NO _x	646.49
Formaldehyde	15.98
Acrolein	2.25
Acetaldehyde	2.25
Benzene	0.57
Methanol	0.73

Note: From January 2009, the facility has been operating its three 5000 hp electric motor-driven compressors, which are not emission units.

2. Navajo Tribal Information

a. General

The reservation of the Navajo Nation is one of the largest Indian reservations in the country, covering more than 27,000 square miles in three states: Arizona, Utah, and New Mexico. The Navajo Nation currently is home to more than 260,000 people. Industries on the reservation include oil and natural gas production, coal mining, electric generation and distribution, and tourism.

b. Local Air Quality and Attainment Status

All areas of the Navajo Nation are currently designated as attainment or unclassifiable for all pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established.

3. Prevention of Significant Deterioration (PSD) Applicability

Transwestern Pipeline Company Klagetoh Compressor Station # 4 was constructed in 1967. This existing source is not in one of the 28 source categories defined in 40 CFR § 52.21(b)(1)(iii) and has potential to emit NO_x and CO greater than 250 TPY. Therefore, this source is an existing PSD major source.

4. Federal Rule Applicability

a. New Source Performance Standard (NSPS) for Stationary Compression Ignition Internal Combustion Engines (40 CFR §§ 60.4200-.4219, Subpart III):

On January 10, 2008, the New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines (40 CFR § 60.4200-.4219, Subpart III) were promulgated. This standard applies to stationary compression ignition internal combustion engines that commenced construction or have been modified or reconstructed after July 11, 2005 and were manufactured after April 1, 2006. (In this subpart, “commence construction” means when the engine was ordered by the manufacturer.) This subpart does not apply to the engines located at the source because they were installed prior to 2005, and have not been modified or reconstructed since July 11, 2005.

b. New Source Performance Standard (NSPS) for Stationary Spark Ignition Internal Combustion Engines (40 CFR §§ 60.4230-.4248, Subpart JJJJ):

On January 10, 2008, the New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines (40 CFR §§ 60.4230-.4248, Subpart III) were promulgated. This subpart applies to stationary spark ignition internal combustion engines manufactured on or after July 1, 2007 or modified or

reconstructed after June 12, 2006. This subpart does not apply to the engines located at the source because they were installed prior to June 12, 2006.

c. National Emission Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production (40 CFR §§ 63.760-.779, Subpart HH):

This source does not meet the definition of an oil and natural gas production facility as specified in 40 CFR § 63.760(a). Therefore, this source is not subject to the requirements of the NESHAP in Subpart HH.

d. NESHAP for Natural Gas Transmission and Storage (40 CFR §§ 63.1270-.1287, Subpart HHH):

This source does not have glycol dehydration units. Therefore, this source is not subject to the requirements of the NESHAP in Subpart HHH, pursuant to 40 CFR § 63.1270(c).

e. NESHAP for Reciprocating Internal Combustion Engines (40 CFR §§ 63.6580 - .6675, Subpart ZZZZ):

This existing source is a HAP major source and has five reciprocating internal combustion engines (RICE): 401, 402, 403, 421, and 422. Therefore, these engines are subject to the requirements of the NESHAP in Subpart ZZZZ. On January 18, 2008, Subpart ZZZZ was revised to extend coverage to RICE that are less than 500 brake hp and to RICE of all sizes that are located at area sources of HAP.

The existing engines (401, 402, 403, 421, and 422) at this source were constructed before December 19, 2002. Therefore, these engines are considered existing affected emission units under this NESHAP, pursuant to 40 CFR § 63.6590(a)(1). Engines 401, 402, and 403 at this source are two-stroke lean-burn (2SLB) engines. Therefore, the emission limits and the operation limits under this NESHAP do not apply to these engines, pursuant to 40 CFR § 63.6600(c). Engines 421 and 422 are four-stroke rich burn (4SRB) engines with a site rating of less than 500 brake HP. Therefore, these engines are not subject to this subpart, pursuant to 40 CFR § 63.6595(a), and no initial notification for these units is required pursuant to 40 CFR § 63.6590(b)(3).

f. Acid Rain Program (40 CFR Parts 72 through 80)

This source does not have any affected units specified in 40 CFR § 72.6(a). Therefore, this source is not subject to requirements of the Acid Rain Program.

g. Continuous Assurance Monitoring (CAM) Program (40 CFR 64)

None of the emission units at this source use an add-on control device as defined in 40 CFR § 64.1. Therefore, the requirements of 40 CFR Part 64 (CAM) are not applicable.

h. Asbestos NESHAP (40 CFR Part 61, Subpart M):

The permittee is subject to the requirements of the Asbestos NESHAP and the applicable requirements are specified in the permit document.

i. Protection of Stratospheric Ozone (40 CFR 82):

The permittee is subject to the requirements of 40 CFR Part 82 and the applicable requirements are specified in the permit document.

Summary of Applicable Federal Requirements

Federal Air Quality Requirement	Current or Future Requirement
Asbestos NESHAP (40 CFR Part 61, Subpart M)	Current
Protection of Stratospheric Ozone (40 CFR Part 82)	Current

5. NNEPA Authority

Authority to administer the Part 71 Permit Program was delegated to NNEPA by U.S. EPA in part on October 13, 2004, and in whole on March 21, 2006. In delegating to NNEPA the authority to administer the Part 71 operating permit program, U.S. EPA determined that NNEPA had adequate independent authority to administer the program, as required by 40 C.F.R. § 71.10(a). U.S. EPA found such authority consisted of having adequate permit processing requirements and adequate permit enforcement-related investigatory authorities. Deleg. Agr. §§ IV, V, VI.1, IX.2. Moreover, before waiving its collection of fees under 40 C.F.R. § 71.9(c)(2)(ii), U.S. EPA determined that NNEPA could collect sufficient revenue under its own authorities to fund a delegated Part 71 Program. Deleg. Agr. at 1 and § II.2. There are therefore references to both federal and tribal provisions in this permit. When federal and tribal provisions are cited in parallel, the tribal provisions are identical to the federal provisions and NNEPA is proposing that compliance with the federal provision will constitute compliance with the tribal counterpart.

All federal terms and conditions of the permit are enforceable by both NNEPA and U.S. EPA, as well as by citizens, under the federal Clean Air Act, with one exception: the reopening provision, contained in Condition IV.L of the existing permit. U.S. EPA may not delegate its authority to reopen a permit or to respond to a petition to reopen the permit. See 40 C.F.R. §§ 71.7(g), 71.10(h). At the same time, NNEPA must retain its own authority to reopen a permit in order to be delegated the Part 71 program. Under § 71.7(g), even when U.S. EPA initiates the reopening process U.S. EPA must provide the delegate

authority an opportunity to revise the permit prior to U.S. EPA itself being able to take such action. NNEPA therefore is proposing to include two reopening provisions, Condition IV.K. and a new Condition IV.L., one for U.S. EPA's reopening authority and one for NNEPA's.

The permit also clarifies that all provisions of Navajo law referenced in the permit are tribally enforceable only, under the NNOPR and the Navajo Nation Air Pollution Prevention and Control Act, 4 N.N.C. §§ 1101-1162. In addition to the permit conditions citing NNOPR provisions in conjunction with provisions of Part 71, there are two proposed conditions that refer to Navajo law only: the second reopening condition, discussed above, and Condition IV.A (Fee Payment), which refers only to the NNOPR because U.S. EPA waived its collection of fees, also noted above. Like the other NNOPR provisions, these provisions are proposed to be labeled as tribally enforceable only.

Finally, under Condition III.C. (Reporting Requirements), certain reports would no longer be required to be submitted to U.S. EPA; instead, those reports would be submitted only to NNEPA.

6. Endangered Species Act

Pursuant to Section 7 of the Endangered Species Act (ESA), 16 U.S.C. § 1536, and its implementing regulations at 50 CFR Part 402, U.S. EPA is required to ensure that any action authorized, funded, or carried out by U.S. EPA is not likely to jeopardize the continued existence of any federally listed endangered species or threatened species, or result in the destruction or adverse modification of the designated critical habitat of any such species. NNEPA is issuing this federal Part 71 permit pursuant to a delegation from U.S. EPA. However, this permit does not authorize the construction of new emission units, or emission increases from existing units, nor does it otherwise authorize any other physical modifications to the facility or its operations. Therefore, NNEPA and U.S. EPA have concluded that the issuance of this permit will have no effect on listed species or their critical habitat.

7. Use of All Credible Evidence

Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit; other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by the source, NNEPA, and U.S. EPA in such determinations.

8. Public Participation

a. Public Notice

As described in 40 C.F.R. § 71.11(a)(5) and NNOPR Subpart IV § 403(A), all draft operating permits shall be publicly noticed and made available for public comment. The public notice requirements for permit actions and the public comment period

are described in 40 C.F.R. § 71.11(d) and NNOPR Subpart IV.

A 30-day public comment period applies to actions pertaining to a draft permit. NNEPA will provide public notice for this draft permit by mailing a copy of the notice to the permit applicant, to U.S. EPA, and to the affected state (Arizona). A copy of the notice will also be provided to all persons who submitted a written request to be included on the mailing list. The request should be made to the following:

Charlene Nelson (Program Supervisor)
Navajo Nation Air Quality Control Program
OPP Section
P.O. Box 529
Fort Defiance, AZ 86504

E-mail: charlenenelson@navajo.org

Public notice will be published in a daily or weekly newspaper of general circulation in the area affected by this source.

b. Opportunity for Comment

Members of the public may review a copy of the draft permit prepared by NNEPA, this statement of basis for the draft permit, the application, and all supporting materials submitted by the source at:

Navajo Nation Air Quality Control Program
OPP Section
Route 112 North, Building No. 2837
Fort Defiance, AZ 86504

Copies of the draft permit and this statement of basis can also be obtained free of charge from NNEPA's website at:

<http://www.navajonationepa.org/opp/permits.html>

or by contacting Charlene Nelson (Program Supervisor) at the NNAQCP office indicated above or by telephone at (928) 729-4247. All documents will be available for review at the NNAQCP office during regular business hours.

If you have comments on the draft permit, you must submit them during the 30-day public comment period. All significant comments received during the public comment period and all significant comments made at any public hearing will be considered in arriving at a final decision on the permit. The final permit is a public record that can be obtained by request. NNEPA will send a statement of reason for

changes made to the draft permits and responses to comments received to persons who commented on the draft permit.

If you believe that any condition of the draft permit is inappropriate, you must raise all reasonably ascertainable issues and submit all arguments supporting your position by the end of the comment period. Any supporting documents must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this permit or consist of tribal, state or federal statutes or regulations, or other generally available referenced materials.

c. Opportunity to Request a Hearing

A person may submit a written request for a public hearing to Charlene Nelson (Program Supervisor), at the NACQP office indicated in Section 8(a) above, by stating the nature of the issues to be raised at the public hearing. Based on the number of hearing requests received, NNEPA will hold a public hearing whenever it finds there is a significant degree of public interest in a draft operating permit. If a public hearing is held, NNEPA will provide public notice of the hearing, and any person may submit oral or written statements and data concerning the draft permit.

d. Mailing List

If you would like to be added to our mailing list to be informed of future actions on this or other Clean Air Act permits issued on the Navajo Nation, please send your name and address to Charlene Nelson (Program Supervisor) at the NACQP office indicated in Section 8(a) above.

Appendix A: Emission Calculations**From Three (3) NG Fired Compressor Engines (401,402,403)****Company Name: Transwestern Pipeline Company - Klagetoh Compressor Station # 4****Address: Section 18, Township 25-N, Range 28-E****10 Miles Northeast of Klagetoh, AZ****Part 71 Renewal: NN OP 09-002****Date: June 23 , 2010****1. Potential to Emit Criteria Pollutants**

Unit ID #	Max. Power Output	Total Operating Hours	Heat Input Capacity (MMBtu/hr)	Emission Factors (lb/MMBtu)							PTE (tons/yr)						
				PM*	PM10*	PM2.5*	SO2*	NOX**	VOC**	CO**	PM	PM10	PM2.5	SO2	NOX	VOC	CO
401	4500	8760	35.6	3.84E-02	4.83E-02	4.83E-02	5.88E-04	2.2	0.0918	0.76	5.99	7.53	7.53	0.09	343.04	14.31	118.51
402	4500	8760	35.6	3.84E-02	4.83E-02	4.83E-02	5.88E-04	2.2	0.0918	0.76	5.99	7.53	7.53	0.09	343.04	14.31	118.51
403	4500	8760	35.6	3.84E-02	4.83E-02	4.83E-02	5.88E-04	2.2	0.0918	0.76	5.99	7.53	7.53	0.09	343.04	14.31	118.51
Total											17.96	22.60	22.60	0.28	1029.12	42.94	355.52

*The emission factors for PM/PM10, and SO₂ are from AP-42, Chapter 3.2, Table 3.2-1 for 2-Stroke Lean-Burn Engines (07/00).

The PM10 emission factor is the summation of the filterable PM and condensable PM emission factors. The emission factor for PM includes filterable PM only.

** The emission factors for Nox, VOC, and CO are from historical test data of similar units

MethodologyPTE of PM/PM10, VOC, CO, and SO₂ (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

PTE of NOx (tons/yr) = Emission Factor (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs

2. Potential to Emit HAPs

Unit ID	Emission Factors (lb/MMBtu)					PTE (tons/yr)				
	Acetaldehyde	Acrolein	Benzene	Formaldehyde	Methanol	Acetaldehyde	Acrolein	Benzene	Formaldehyde	Methanol
401	7.76E-03	7.78E-03	1.94E-03	5.52E-02	2.50E-03	1.21	1.21	0.30	8.61	0.39
402	7.76E-03	7.78E-03	1.94E-03	5.52E-02	2.50E-03	1.21	1.21	0.30	8.61	0.39
403	7.76E-03	7.78E-03	1.94E-03	5.52E-02	2.50E-03	1.21	1.21	0.30	8.61	0.39
Total HAP						3.63	3.64	0.91	25.82	1.17

Note: Emission factors are from AP-42, Chapter 3.2, Table 3.2-1 for 2-Stroke Lean-Burn Engines (07/00).

Methodology

PTE of HAPs (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations

From Two (2) Auxiliary Engines (421,422)

Company Name: Transwestern Pipeline Company - Klagetoh Compressor Station # 4
Address: Section 18, Township 25-N, Range 28-E
 10 Miles Northeast of Klagetoh, AZ
Part 71 Renewal: NN OP 09-002
Date: June 23, 2010

1. Potential to Emit Criteria Pollutants

Unit ID #	Max. Power Output	Total Heat Input	Emission Factors (lb/MMBtu)								PTE (tons/yr)						
			PM*	PM10*	PM2.5*	SO2*	NOX**	VOC**	CO**	PM	PM10	PM2.5	SO2	NOX	VOC	CO	
421	450	8760	3.38	9.91E-03	1.94E-02	1.94E-02	5.88E-04	2.27	0.0296	3.51	0.15	0.29	0.29	0.01	33.61	0.44	51.96
422	450	8760	3.38	9.91E-03	1.94E-02	1.94E-02	5.88E-04	2.27	0.0296	3.51	0.15	0.29	0.29	0.01	33.61	0.44	51.96
Total											0.29	0.57	0.57	0.02	67.21	0.88	103.93

*The emission factors for PM/PM10, VOC, and SO₂ are from AP-42, Chapter 3.2, Table 3.2-3 for 4-Stroke Rich-Burn Engines (07/00).
 The PM10 emission factor is the summation of the filterable PM and condensable PM emission factors. The emission factor for PM includes filterable PM only.
 ** The emission factor for NOx and CO was provided by the source based on the average test results for the same model engines at this plant in 2000, plus a safety margin.

Methodology

PTE of PM/PM10, VOC, CO, and SO₂ (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs
 PTE of NOx (tons/yr) = Emission Factor (lbs/hr) x 3 engines x 8760 hrs/yr x 1 ton/2000 lbs

2. Potential to Emit HAPs

Unit ID	Emission Factors (lb/MMBtu)					PTE (tons/yr)				
	Acetaldehyde	Acrolein	Benzene	Formaldehyde	Methanol	Acetaldehyde	Acrolein	Benzene	Formaldehyde	Methanol
421	2.79E-03	2.63E-03	1.58E-03	2.05E-02	3.06E-03	0.04	0.04	0.02	0.30	0.05
422	2.79E-03	2.63E-03	1.58E-03	2.05E-02	3.06E-03	0.04	0.04	0.02	0.30	0.05
Total HAP						0.08	0.08	0.05	0.61	0.09

Note: Emission factors are from AP-42, Chapter 3.2, Table 3.2-1 for 2-Stroke Lean-Burn Engines (07/00).

Methodology

PTE of HAPs (tons/yr) = Heat Input Capacity (MMBtu/hr) x Emission Factor (lbs/MMBtu) x 8760 hrs/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations

Potential to Emit Summary

Company Name: Transwestern Pipeline Company - Klagetoh Compressor Station # 4
Address: Section 18, Township 25-N, Range 28-E
10 Miles Northeast of Klagetoh, AZ
Part 71 Renewal: NN OP 09-002
Date: June 23 , 2010

Emission Units	PM (tons/yr)	PM10 (tons/yr)	PM 2.5 (tons/yr)	SO ₂ (tons/yr)	NO _x (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Total HAPs (tons/yr)
401	5.99	7.53	7.53	0.09	343.04	14.31	118.51	11.72
402	5.99	7.53	7.53	0.09	343.04	14.31	118.51	11.72
403	5.99	7.53	7.53	0.09	343.04	14.31	118.51	11.72
421	0.15	0.29	0.29	0.01	33.61	0.44	51.96	0.45
422	0.15	0.29	0.29	0.01	33.61	0.44	51.96	0.45
Insignificant Activities *	5.00	5.00	5.00			5.00		Negligible
Total PTE	23.3	28.2	28.2	0.29	1,096	49	459	36

* This is an estimate on the PM10/PM2.5 emissions and fugitive VOC emissions from equipment leaks, blowdown, and pressure relief valves.



Public Notice

PROPOSED RENEWAL OF PART 71 PERMITS
TRANSWESTERN PIPELINE COMPANY
LOCATED IN KLAGETOH, ARIZONA AND LEUPP, ARIZONA



The Navajo Nation Environmental Protection Agency (NNEPA), Navajo Air Quality Control Program (NAQCP), Operating Permit Program (OPP) Section is accepting written comments on the renewal of Part 71 permits for the following Transwestern Pipeline Company operations. These operations perform natural gas inlet separation and natural gas compression.

1. Klagetoh Compressor Station Number 4. The Klagetoh Compressor Station is located 10 miles Northeast of Klagetoh, Arizona on the Navajo Nation. The compressor station consists of natural gas fired compressors and reciprocating engines, as well as various storage tanks.
2. Leupp Compressor Station Number 3. The Leupp Compressor Station is located 8 miles East of Leupp, Arizona on the Navajo Nation. The compressor station consists of a natural gas fired turbine compressor, natural gas fired reciprocating engines, and various storage tanks.

Neither the Klagetoh Compressor Station Number 4 nor the Leupp Compressor Station Number 3 contains any new equipment that would emit air pollutants since the issuance of the last Part 71 operating permits, and no conditions from previously issued permits/approvals have been changed. This notice of draft Part 71 renewal permits fulfills the public notice procedures to which the draft permits are subject.

Written comments, written requests for a public hearing, written requests for notification of the final decision regarding these permit actions, or inquiries or requests for additional information regarding these permit actions may be submitted to Charlene Nelson (Program Supervisor) at NNAQCP, OPP Section, P.O. Box 529, Fort Defiance, AZ 86504. **Written comments and/or written requests must be received by 12:30 p.m., September 7, 2010.** Written comments will be considered prior to final permit decisions.

If NNEPA finds a significant degree of public interest, a public hearing will be held. NNEPA will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The applications, proposed air permits, and statements of basis are available for review at NNEPA, NNAQCP, OPP Section, Route 112 North, Building No. 2837, Fort Defiance, AZ 86504. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays).

Inquiries or requests for additional information regarding these permit actions should be directed to Charlene Nelson (Program Supervisor) at the above address or by phone at (928) 729-4247.

Persons wishing to be included on the NNAQCP permit public notice mailing list should contact Ms. Angie Frank in writing at NNAQCP, OPP Section, at the above address, by phone at (928) 729-4096, or by email at nnepanilchi@navajo.org. E-files of permit public notices and permits can be requested from NNEPA (NNAQCP) by email request at nnepanilchi@navajo.org.



**NAVAJO NATION ENVIRONMENTAL PROTECTION
AGENCY**

**Navajo Nation Operating Permit Program
Rt. 112 North, Building F004-051
P.O. Box 529, Fort Defiance, AZ 86504**



Detailed Information

Permitting Authority: NNEPA

County: Apache

State: Arizona

AFS Plant ID: 04-001-N0106

Facility: Transwestern Pipeline Company Klagetoh Compressor Station # 4

Document Type: RESPONSES TO COMMENTS

RESPONSES TO COMMENTS

**on the Part 71 Permit Renewal to Operate
Transwestern Pipeline Company - Klagetoh Compressor Station # 4**

Permit No. NN OP 09-002

Between August 6, 2010 and September 7, 2010, the Navajo Nation Environmental Protection Agency (NNEPA) had a notice published in the Navajo Times of Window Rock, Arizona, Gallup Independent of Gallup, New Mexico and Arizona Daily Sun, Flagstaff, Arizona and announced on radio station KTNN-AM 660 stating that Transwestern Pipeline Company, Klagetoh Compressor Station # 4 located at Section 18, Township 25-N, Range 28-E, 10 miles northeast of Klagetoh, Arizona, had applied for a Part 71 Operating Permit renewal to operate a natural gas compressor station. The notice also stated that NNEPA proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 16, 2010, Transwestern Pipeline Company, Klagetoh Compressor Station # 4 (referred to as "the permittee") stated that they have no comments on the proposed Part 71 Operating Permit. There were no comments received on the proposed Part 71 Operating Permit.