

NMED AIR QUALITY TITLE V RENEWAL APPLICATION EL PASO NATURAL GAS COMPANY, LLC ROSWELL COMPRESSOR STATION

Prepared By:

Adam Erenstein – Manager of Consulting Services

TRINITY CONSULTANTS

9400 Holly Ave NE
Bldg 3, Suite B
Albuquerque, NM 87122
(505) 266-6611

May 2024

Project 233201.0171





9400 Holly Ave NE, Bldg 3, Ste B, Albuquerque, NM 87122 / P 505.266.6611 / trinityconsultants.com

July 10, 2024

Permit Programs Manager
NMED Air Quality Bureau
525 Camino de los Marques, Suite 1
Santa Fe, NM 87505

*RE: Application for Title V Renewal
El Paso Natural Gas company, L.L.C. – Florida Compressor Station*

Dear Permit Programs Manager:

On behalf of, we are submitting this application to meet requirements of a Title V Renewal application pursuant to 20.2.70.300.B.(2) NMAC, which requires a Title V Permit renewal application be submitted at least twelve (12) months prior to expiration of the current Title V Operating Permit (current permit expires July 23, 2025).

The format and content of this application are consistent with the Bureau's current policy regarding Title V applications; it is a complete application package using the most current application forms. Enclosed is one hard copy and one working copy of the application, including the original certification page, electronic files, and an application check. Please feel free to contact me at (505) 266-6611 or by email at arenstein@trinityconsultants.com if you have any questions regarding this application. Alternatively, you may contact Wade Janecek with El Paso Natural Gas Company, LLC at (303) 914-7602 or by email at wade_janecek@kindermorgan.com.

Sincerely,

TRINITY CONSULTANTS

Adam Erenstein
Manager of Consulting Services

cc: Wade Janecek (El Paso natural Gas Company, LLC)
Trinity Project File 233201.0171

HEADQUARTERS

12700 Park Central Dr, Ste 600, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203



Air Permit Application Compliance History Disclosure Form

Pursuant to Subsection 74-2-7(S) of the New Mexico Air Quality Control Act ("AQCA"), NMSA §§ 74-2-1 to -17, the New Mexico Environment Department ("Department") may deny any permit application or revoke any permit issued pursuant to the AQCA if, within ten years immediately preceding the date of submission of the permit application, the applicant met any one of the criteria outlined below. In order for the Department to deem an air permit application administratively complete, or issue an air permit for those permits without an administrative completeness determination process, the applicant must complete this Compliance History Disclosure Form as specified in Subsection 74-2-7(P). An existing permit holder (permit issued prior to June 18, 2021) shall provide this Compliance History Disclosure Form to the Department upon request.

Permittee/Applicant Company Name		Expected Application Submittal Date
El Paso Natural Gas Company, LLC		May 13, 2024
Permittee/Company Contact	Phone	Email
Wade Janecek	(303) 914-7602	Wade_janecek@kindermorgan.com
Within the 10 years preceding the expected date of submittal of the application, has the permittee or applicant:		
1	Knowingly misrepresented a material fact in an application for a permit?	☐ Yes ☒ No
2	Refused to disclose information required by the provisions of the New Mexico Air Quality Control Act?	☐ Yes ☒ No
3	Been convicted of a felony related to environmental crime in any court of any state or the United States?	☐ Yes ☒ No
4	Been convicted of a crime defined by state or federal statute as involving or being in restraint of trade, price fixing, bribery, or fraud in any court of any state or the United States?	☐ Yes ☒ No
5a	Constructed or operated any facility for which a permit was sought, including the current facility, without the required air quality permit(s) under 20.2.70 NMAC, 20.2.72 NMAC, 20.2.74 NMAC, 20.2.79 NMAC, or 20.2.84 NMAC?	☐ Yes ☒ No
5b	If "No" to question 5a, go to question 6. If "Yes" to question 5a, state whether each facility that was constructed or operated without the required air quality permit met at least one of the following exceptions: a. The unpermitted facility was discovered after acquisition during a timely environmental audit that was authorized by the Department; or b. The operator of the facility estimated that the facility's emissions would not require an air permit, and the operator applied for an air permit within 30 calendar days of discovering that an air permit was required for the facility.	☐ Yes ☐ No
6	Had any permit revoked or permanently suspended for cause under the environmental laws of any state or the United States?	☐ Yes ☒ No
7	For each "yes" answer, please provide an explanation and documentation.	

FMail Application To: New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505 Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb		For Department use only:
---	---	---------------------------------

Universal Air Quality Permit Application

Use this application for NOI, NSR, or Title V sources.

Use this application for: the initial application, modifications, technical revisions, and renewals. For technical revisions, complete Sections, 1-A, 1-B, 2-E, 3, 9 and any other sections that are relevant to the requested action; coordination with the Air Quality Bureau permit staff prior to submittal is encouraged to clarify submittal requirements and to determine if more or less than these sections of the application are needed. Use this application for streamline permits as well.

This application is submitted as (check all that apply): ☐ Request for a No Permit Required Determination (no fee)
☐ **Updating** an application currently under NMED review. Include this page and all pages that are being updated (no fee required).
Construction Status: ☐ Not Constructed ☒ Existing Permitted (or NOI) Facility ☐ Existing Non-permitted (or NOI) Facility
Minor Source: ☐ NOI 20.2.73 NMAC ☐ 20.2.72 NMAC application or revision ☐ 20.2.72.300 NMAC Streamline application
Title V Source: ☐ Title V (new) ☒ Title V renewal ☐ TV minor mod. ☐ TV significant mod. ☐ TV Acid Rain: ☐ New ☐ Renewal
PSD Major Source: ☐ PSD major source (new) ☐ Minor Modification to a PSD source ☐ a PSD major modification

Acknowledgements:

- ☒ I acknowledge that a pre-application meeting is available to me upon request. ☒ Title V Operating, Title IV Acid Rain, and NPR applications have no fees.
- ☐ \$500 NSR application Filing Fee enclosed **OR** ☐ The full permit fee associated with 10 fee points (required w/ streamline applications).
- ☐ Check No.: in the amount of
- ☒ I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.
- ☒ I acknowledge there is an annual fee for permits in addition to the permit review fee: www.env.nm.gov/air-quality/permit-fees-2/.
- ☐ This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full \$500.00 filing fee is included with this application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information: www.env.nm.gov/air-quality/small-biz-eap-2/.)

Citation: Please provide the **low level citation** under which this application is being submitted: **20.2.70.300.B(2) NMAC** (e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is 20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

Section 1 – Facility Information

Section 1-A: Company Information		AI # if known: 6	Updating Permit/NOI #: P128-R4
1	Facility Name: Roswell Compressor Station	Plant primary SIC Code (4 digits): 4922	
		Plant NAIC code (6 digits): 486210	
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): From Roswell, head north on US-285 for approximately 22.5 miles. Turn right (east) on Co Rd 100/Red Bluff Road. Continue for 1.2 miles to the facility.		
2	Plant Operator Company Name: El Paso Natural Gas Company, L.L.C.	Phone/Fax: (520) 663-4200 / (520) 663-4259	

a	Plant Operator Address: 5151 E. Broadway Blvd., Suite 1680, Tucson AZ 85711	
b	Plant Operator's New Mexico Corporate ID or Tax ID: 46-0809216	
3	Plant Owner(s) name(s): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (719) 329-5634 / N/A
a	Plant Owner(s) Mailing Address(s): 2 North Nevada, Colorado Springs, CO 80903	
4	Bill To (Company): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (719) 329-5634 / N/A
a	Mailing Address: 2 North Nevada, Colorado Springs, CO 80903	E-mail: Wade_Janecek@kindermorgan.com
5	☒ Preparer: ☒ Consultant: Trinity Consultants Inc.	Phone/Fax: (505) 266-6611/ N/A
a	Mailing Address: 9400 Holly Avenue NE, Bldg. 3 Suite B Albuquerque, NM 87122	E-mail: AErenstein@trinityconsultants.com
6	Plant Operator Contact: Rory Taylor, Manager	Phone/Fax: (505) 831-7754 / N/A
a	Address: 84 El Paso Circle, Gallup, NM 87301	E-mail: Rory_Taylor@kindermorgan.com
7	Air Permit Contact: Wade Janecek	Title: EHS Engineer
a	E-mail: Wade_Janecek@kindermorgan.com	Phone/Fax: (303) 914-7602 / N/A
b	Mailing Address: 2 North Nevada Ave., Colorado Springs, CO 80903	
c	The designated Air permit Contact will receive all official correspondence (i.e. letters, permits) from the Air Quality Bureau.	

Section 1-B: Current Facility Status

1.a	Has this facility already been constructed? ☒ Yes ☐ No	1.b If yes to question 1.a, is it currently operating in New Mexico? ☒ Yes ☐ No
2	If yes to question 1.a, was the existing facility subject to a Notice of Intent (NOI) (20.2.73 NMAC) before submittal of this application? ☐ Yes ☒ No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? ☐ Yes ☒ No
3	Is the facility currently shut down? ☐ Yes ☒ No	If yes, give month and year of shut down (MM/YY): N/A
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? ☒ Yes ☐ No	
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972? ☒ Yes ☐ No ☐ N/A	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? ☒ Yes ☐ No	If yes, the permit No. is: P-128-R4
7	Has this facility been issued a No Permit Required (NPR)? ☐ Yes ☒ No	If yes, the NPR No. is: N/A
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes ☒ No	If yes, the NOI No. is: N/A
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? ☒ Yes ☐ No	If yes, the permit No. is: 3375M1
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? ☐ Yes ☒ No	If yes, the register No. is: N/A

Section 1-C: Facility Input Capacity & Production Rate

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 33.33 MMscf	Daily: 800 MMscf	Annually: 292,000 MMscf
b	Proposed	Hourly: 33.33 MMscf	Daily: 800 MMscf	Annually: 292,000 MMscf
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 33.33 MMscf	Daily: 800 MMscf	Annually: 292,000 MMscf
b	Proposed	Hourly: 33.33 MMscf	Daily: 800 MMscf	Annually: 292,000 MMscf

Section 1-D: Facility Location Information

1	Latitude (decimal degrees): 33.7118	Longitude (decimal degrees): -104.5495	County: Chaves	Elevation (ft): 3,845
2	UTM Zone: ☐ 12 or ☒ 13		Datum: ☐ NAD 83 ☒ WGS 84	
a	UTM E (in meters, to nearest 10 meters): 541,740 m		UTM N (in meters, to nearest 10 meters): 3,730,290 m	
3	Name and zip code of nearest New Mexico town: Roswell, 88201			
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From Roswell, NM, head north on US-285 for approximately 22.5 miles. Turn right on Co Rd 100/Red Bluff Road and continue for 1.2 mile before reaching your destination.			
5	The facility is 23 miles north of Roswell, NM.			
6	Land Status of facility (check one): ☒ Private ☐ Indian/Pueblo ☐ Government ☐ BLM ☐ Forest Service ☐ Military			
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: Municipalities: None. Indian Tribes: None. Counties: Chaves.			
8	20.2.72 NMAC applications only: Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see www.env.nm.gov/air-quality/modeling-publications/)? ☒ Yes ☐ No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers:			
9	Name nearest Class I area: Salt Creek Wilderness			
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 14.13 km			
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: 880 m			
12	Method(s) used to delineate the Restricted Area: Continuous Fencing "Restricted Area" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.			
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC? ☐ Yes ☒ No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.			
14	Will this facility operate in conjunction with other air regulated parties on the same property? ☒ No ☐ Yes If yes, what is the name and permit number (if known) of the other facility?			

Section 1-E: Proposed Operating Schedule (The 1-E.1 & 1-E.2 operating schedules may become conditions in the permit.)

1	Facility maximum operating ($\frac{\text{hours}}{\text{day}}$): 24	($\frac{\text{days}}{\text{week}}$): 7	($\frac{\text{weeks}}{\text{year}}$): 52	($\frac{\text{hours}}{\text{year}}$): 8760
2	Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start: N/A		☐ AM ☐ PM	End: N/A ☒ AM ☒ PM
3	Month and year of anticipated start of construction: N/A—No construction proposed			
4	Month and year of anticipated construction completion: N/A—No construction proposed			
5	Month and year of anticipated startup of new or modified facility: N/A—No construction proposed			
6	Will this facility operate at this site for more than one year? ☒ Yes ☐ No			

Section 1-F: Other Facility Information

1	Are there any current Notice of Violations (NOV), compliance orders, or any other compliance or enforcement issues related to this facility? ☐ Yes ☒ No If yes, specify: N/A
---	---

a	If yes, NOV date or description of issue: N/A		NOV Tracking No: N/A
b	Is this application in response to any issue listed in 1-F, 1 or 1a above? ☐ Yes ☒ No If Yes, provide the 1c & 1d info below:		
c	Document Title: N/A	Date: N/A	Requirement # (or page # and paragraph #): N/A
d	Provide the required text to be inserted in this permit: N/A		
2	Is air quality dispersion modeling or modeling waiver being submitted with this application? ☐ Yes ☒ No		
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? ☐ Yes ☒ No		
4	Will this facility be a source of federal Hazardous Air Pollutants (HAP)? ☒ Yes ☐ No		
a	If Yes, what type of source? ☒ Major (☒ ≥10 tpy of any single HAP OR ☒ ≥25 tpy of any combination of HAPS) OR ☐ Minor (☐ <10 tpy of any single HAP AND ☐ <25 tpy of any combination of HAPS)		
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☒ Yes ☐ No		
a	If yes, include the name of company providing commercial electric power to the facility: Central Valley Electric Cooperative, Inc. Commercial power is purchased from a commercial utility company, which specifically does not include power generated on site for the sole purpose of the user.		

Section 1-G: Streamline Application (This section applies to 20.2.72.300 NMAC Streamline applications only)

1	☐ I have filled out Section 18, "Addendum for Streamline Applications." ☒ N/A (This is not a Streamline application.)
---	--

Section 1-H: Current Title V Information - Required for all applications from TV Sources

(Title V-source required information for all applications submitted pursuant to 20.2.72 NMAC (Minor Construction Permits), or 20.2.74/20.2.79 NMAC (Major PSD/NNSR applications), and/or 20.2.70 NMAC (Title V))

1	Responsible Official (R.O.) (20.2.70.300.D.2 NMAC): Ted Meinhold		Phone: (713) 420-2765
a	R.O. Title: Vice President of Operations	R.O. e-mail: Ted_Meinhold@kindermorgan.com	
b	R. O. Address: 1001 Louisiana, Suite 1417, Houston, TX 77002		
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC): Don W. Perkins		Phone: (970) 208-1268
a	A. R.O. Title: Operations Director Division 3	A. R.O. e-mail: Don_Perkins@kindermorgan.com	
b	A. R. O. Address: 2527 Foresight Circle, Grand Junction, CO 81505		
3	Company's Corporate or Partnership Relationship to any other Air Quality Permittee (List the names of any companies that have operating (20.2.70 NMAC) permits and with whom the applicant for this permit has a corporate or partnership relationship): El Paso Natural Gas Company, L.L.C. was formerly named "El Paso Natural Gas Company" (until 8/6/2012); both names may appear on operating permits and refer to the same company. Trans Colorado, NGPL		
4	Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.): Kinder Morgan, Inc.		
a	Address of Parent Company: 1001 Louisiana St, Suite 1000, Houston, TX 77002		
5	Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are owned, wholly or in part, by the company to be permitted.): Mojave Pipeline Company, LLC		
6	Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: Wade Janecek 303-914-7602 and Rory Taylor 505-831-7754		

7	Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B)? If yes, state which ones and provide the distances in kilometers: N/A
---	--

Section 1-I – Submittal Requirements

Each 20.2.73 NMAC (**NOI**), a 20.2.70 NMAC (**Title V**), a 20.2.72 NMAC (**NSR** minor source), or 20.2.74 NMAC (**PSD**) application package shall consist of the following:

Hard Copy Submittal Requirements:

- 1) One hard copy **original signed and notarized application package printed double sided 'head-to-toe' 2-hole punched** as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be **head-to-head**. Please use **numbered tab separators** in the hard copy submittal(s) as this facilitates the review process. For NOI submittals only, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required. **Please include a copy of the check on a separate page.**
- 2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This **copy** should be printed in book form, 3-hole punched, and **must be double sided**. Note that this is in addition to the head-to-to 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.
- 3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these permit application submittals, **two CD** copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a **single CD** submittal. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB's secure file transfer service.

Electronic files sent by (check one):

☐ CD/DVD attached to paper application

☒ Secure electronic transfer. Air Permit Contact: [Adam Erenstein, AErenstein@trinityconsultants.com](mailto:AErenstein@trinityconsultants.com), (505) 266-6611.

a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.**

- 4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.
- 5) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver** and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling **summary report only** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.
- 6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
 - a. one additional CD copy for US EPA,
 - b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
 - c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.
 If the application is submitted electronically through the secure file transfer service, these extra CDs do not need to be submitted.

Electronic Submittal Requirements [in addition to the required hard copy(ies)]:

- 1) All required electronic documents shall be submitted as 2 separate CDs or submitted through the AQB secure file transfer service. Submit a single PDF document of the entire application as submitted and the individual documents comprising the application.
- 2) The documents should also be submitted in Microsoft Office compatible file format (Word, Excel, etc.) allowing us to access the text and formulas in the documents (copy & paste). Any documents that cannot be submitted in a Microsoft Office compatible format shall be saved as a PDF file from within the electronic document that created the file. If you are unable to provide Microsoft office compatible electronic files or internally generated PDF files of files (items that were not created electronically: i.e. brochures, maps, graphics, etc.), submit these items in hard copy format. We must be able to review the formulas and inputs that calculated the emissions.
- 3) It is preferred that this application form be submitted as 4 electronic files (**3 MSWord docs**: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and **1 Excel file** of the tables (Universal Application section 2 [UA2]). Please include as many of the 3-19 Sections as practical in a single MS Word electronic document. Create separate electronic file(s) if a single file becomes too large or if portions must be saved in a file format other than MS Word.
- 4) The **electronic file names** shall be a maximum of 25 characters long (including spaces, if any). The format of the electronic Universal Application shall be in the format: "A-3423-FacilityName". The "A" distinguishes the file as an application submittal, as opposed to other documents the Department itself puts into the database. Thus, all electronic application submittals should begin with "A-". Modifications to existing facilities should use the **core permit number** (i.e. '3423') the Department assigned to the facility as the next 4 digits. Use 'XXXX' for new facility applications. The format of any separate electronic submittals (additional submittals such as non-Word attachments, re-submittals, application updates) and Section document shall be in the format: "A-3423-9-description", where "9" stands for the **section #** (in this case Section 9-Public Notice). Please refrain, as much as possible, from submitting any scanned documents as this file format is extremely large, which uses up too much storage capacity in our database. Please take the time to fill out the **header information** throughout all submittals as this will identify any loose pages, including the Application Date (date submitted) & Revision number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

Table of Contents

Section 1:	General Facility Information
Section 2:	Tables
Section 3:	Application Summary
Section 4:	Process Flow Sheet
Section 5:	Plot Plan Drawn to Scale
Section 6:	All Calculations
Section 7:	Information Used to Determine Emissions
Section 8:	Map(s)
Section 9:	Proof of Public Notice
Section 10:	Written Description of the Routine Operations of the Facility
Section 11:	Source Determination
Section 12:	PSD Applicability Determination for All Sources & Special Requirements for a PSD Application
Section 13:	Discussion Demonstrating Compliance with Each Applicable State & Federal Regulation
Section 14:	Operational Plan to Mitigate Emissions
Section 15:	Alternative Operating Scenarios
Section 16:	Air Dispersion Modeling
Section 17:	Compliance Test History
Section 18:	Addendum for Streamline Applications (streamline applications only)
Section 19:	Requirements for the Title V (20.2.70 NMAC) Program (Title V applications only)
Section 20:	Other Relevant Information
Section 21:	Addendum for Landfill Applications
Section 22:	Certification Page

Table 2-A: Regulated Emission Sources

Unit and stack numbering must correspond throughout the application package. If applying for a NOI under 20.2.73 NMAC, equipment exemptions under 2.72.202 NMAC do not apply.

Unit Number ¹	Source Description	Make	Model #	Serial #	Manufact- urer's Rated Capacity ³ (Specify Units)	Requested Permitted Capacity ³ (Specify Units)	Date of Manufacture ²	Controlled by Unit #	Source Classi- fication Code (SCC)	For Each Piece of Equipment, Check One		RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) ⁴	Replacing Unit No.
							Date of Construction/ Reconstruction ²	Emissions vented to Stack #		☐ Existing (unchanged) ☐ New/Additional ☒ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
A-01	Rice	Clark	TLA-10	79009	3400 hp	3400 hp	January 1958	Catalyst 1	20200202	☐ Existing (unchanged) ☐ New/Additional ☒ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	2SLB	N/A
							Jan 1958, Retrofit on 11/14/07	A-01					
A-02	Rice	Clark	TLA-10	79010	3400 hp	3400 hp	January 1958	Catalyst 2	20200202	☐ Existing (unchanged) ☐ New/Additional ☒ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	2SLB	N/A
							Jan 1958, Retrofit on 11/14/07	A-02					
A-03	Rice	Clark	TLA-10	79006	3400 hp	3400 hp	October 1958	Catalyst 3	20200202	☐ Existing (unchanged) ☐ New/Additional ☒ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	2SLB	N/A
							Oct 1958, Retrofit on 11/14/07	A-03					
AUX-A1	Rice	CAT	3512 STD	4KC0092	680 hp	680 hp	July, 2000	N/A	20100202	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced	4SLB	N/A
							2000	AUX-A1					
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		
										☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified	☐ To be Removed ☐ Replacement Unit ☐ To be Replaced		

¹ Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.² Specify dates required to determine regulatory applicability.³ To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set.⁴ "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

Table 2-B: Insignificant Activities¹ (20.2.70 NMAC) OR Exempted Equipment (20.2.72 NMAC)

All 20.2.70 NMAC (Title V) applications must list all Insignificant Activities in this table. All 20.2.72 NMAC applications must list Exempted Equipment in this table. If equipment listed on this table is exempt under 20.2.72.202.B.5, include emissions calculations and emissions totals for 202.B.5 "similar functions" units, operations, and activities in Section 6, Calculations. Equipment and activities exempted under 20.2.72.202 NMAC may not necessarily be Insignificant under 20.2.70 NMAC (and vice versa). Unit & stack numbering must be consistent throughout the application package. Per Exemptions Policy 02-012.00 (see http://www.env.nm.gov/aqb/permit/aqb_pol.html), 20.2.72.202.B NMAC Exemptions do not apply, but 20.2.72.202.A NMAC exemptions do apply to NOI facilities under 20.2.73 NMAC. List 20.2.72.301.D.4 NMAC Auxiliary Equipment for Streamline applications in Table 2-A. The List of Insignificant Activities (for TV) can be found online at <https://www.env.nm.gov/wp-content/uploads/sites/2/2017/10/InsignificantListTitleV.pdf>. TV sources may elect to enter both TV Insignificant Activities and Part 72 Exemptions on this form.

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²	For Each Piece of Equipment, Check One
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction ²	
T-001	Lube Oil Storage Tank	N/A	N/A	8,225	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-002	Coolant Storage Tank	N/A	N/A	8,225	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-003	Used Oil Storage Tank	N/A	N/A	872	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-004	Used Oil Storage Tank	N/A	N/A	872	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-005	Used Oil Storage Tank	N/A	N/A	1,880	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-006	Used Lube Oil Storage Tank	N/A	N/A	500	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-007	Used Lube Oil Storage Tank	N/A	N/A	500	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-008	Below Grade Used Lube Oil Storage Tank	N/A	N/A	1,000	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-009	Below Grade Used Lube Oil Storage Tank (out of service)	N/A	N/A	1,000	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	Item #5	1958	☐ New/Additional ☐ Replacement Unit
T-010	Aux-engine lube oil tank	N/A	N/A	35	20.2.72.202.B.5	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	gal	item #5	N/A	☐ New/Additional ☐ Replacement Unit
F-001	Facility-wide fugitives	N/A	N/A	N/A	20.2.72.202.C.1.z	N/A	☒ Existing (unchanged) ☐ be Removed
			N/A	N/A	Item #1a	N/A	☐ New/Additional ☐ Replacement Unit
							☒ Existing (unchanged) ☐ be Removed
							☐ New/Additional ☐ Replacement Unit
							☒ Existing (unchanged) ☐ be Removed
							☐ New/Additional ☐ Replacement Unit

¹ Insignificant activities exempted due to size or production rate are defined in 20.2.70.300.D.6, 20.2.70.7.Q NMAC, and the NMED/AQB List of Insignificant Activities, dated September 15, 2008. Emissions from these insignificant activities do not need to be reported, unless specifically requested.

² Specify date(s) required to determine regulatory applicability.

Unit and stack numbering must correspond throughout the application package. Only list control equipment for TAPs if the TAP's maximum uncontrolled emissions rate is over its respective threshold as listed in 20.2.72 NMAC, Subpart V, Tables A and B. In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions.

[illegible]

¹ List each control device on a separate line. For each control device, list all emission units controlled by the control device.

Table 2-G: Stack Exit and Fugitive Emission Rates for Special Stacks

☒ I have elected to leave this table blank because this facility does not have any stacks/vents that split emissions from a single source or combine emissions from more than one source listed in table 2-A. Additionally, the emission rates of all stacks match the Requested allowable emission rates stated in Table 2-E.

Use this table to list stack emissions (requested allowable) from split and combined stacks. List Toxic Air Pollutants (TAPs) and Hazardous Air Pollutants (HAPs) in Table 2-I. List all fugitives that are associated with the normal, routine, and non-emergency operation of the facility. Unit and stack numbering must correspond throughout the application package. Refer to Table 2-E for instructions on use of the “-” symbol and on significant figures.

[illegible]

Unit and stack numbering must correspond throughout the application package. Include the stack exit conditions for each unit that emits from a stack, including blowdown venting parameters and tank emissions. If the facility has multiple operating scenarios, complete a separate Table 2-H for each scenario and, for each, type scenario name here:

[illegible]

Table 2-1: Stack Exit and Fugitive Emission Rates for HAPs and TAPs

In the table below, report the Potential to Emit for each HAP from each regulated emission unit listed in Table 2-A, only if the entire facility emits the HAP at a rate greater than or equal to one (1) ton per year. For each such emission unit, HAPs shall be reported to the nearest 0.1 tpy. Each facility-wide Individual HAP total and the facility-wide Total HAPs shall be the sum of all HAP sources calculated to the nearest 0.1 ton per year. Per 20.2.72.403.A.1 NMAC, facilities not exempt [see 20.2.72.402.C NMAC] from TAP permitting shall report each TAP that has an uncontrolled emission rate in excess of its pounds per hour screening level specified in 20.2.72.502 NMAC. TAPs shall be reported using one more significant figure than the number of significant figures shown in the pound per hour threshold corresponding to the substance. Use the HAP nomenclature as it appears in Section 112 (b) of the 1990 CAAA and the TAP nomenclature as it listed in 20.2.72.502 NMAC. Include tank-flashing emissions estimates of HAPs in this table. For each HAP or TAP listed, fill all cells in this table with the emission numbers or a "-" symbol. A "--" symbol indicates that emissions of this pollutant are not expected or the pollutant is emitted in a quantity less than the threshold amounts described above.

Stack No.	Unit No.(s)	Total HAPs		HAP or TAP		MethanolHAP or TAP		AcetaldehydeHAP or TAP		AcroleinHAP or TAP		StyreneHAP or TAP		XylenesHAP or TAP		2,2,4-TrimethylpentaneHAP or TAP		n-HexaneHAP or TAP	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
A-01	A-01	2.87	12.56	1.68	7.37	0.11	0.47	0.18	0.78	0.10	0.43	0.19	0.81	0.09	0.41	0.21	0.91	0.12	0.52
A-02	A-02	2.87	12.56	1.68	7.37	0.11	0.47	0.18	0.78	0.10	0.43	0.19	0.81	0.09	0.41	0.21	0.91	0.12	0.52
A-03	A-03	2.87	12.56	1.68	7.37	0.11	0.47	0.18	0.78	0.10	0.43	0.19	0.81	0.09	0.41	0.21	0.91	0.12	0.52
AUX-A1	AUX-A2	**	**	**	**	**	**	**	**	**	**	**	**	**	**	**	**	**	**
Totals:		8.6	37.68	5.05	22.11	0.32	1.40	0.53	2.33	0.29	1.28	0.56	2.44	0.28	1.24	0.62	2.72	0.35	1.55

Specify fuel characteristics and usage. Unit and stack numbering must correspond throughout the application package.

Printed 4/26/2024 3:38 PM

For each tank, list the liquid(s) to be stored in each tank. If it is expected that a tank may store a variety of hydrocarbon liquids, enter "mixed hydrocarbons" in the Composition column for that tank and enter the corresponding data of the most volatile liquid to be stored in the tank. If tank is to be used for storage of different materials, list all the materials in the "All Calculations" attachment, run the newest version of TANKS on each, and use the material with the highest emission rate to determine maximum uncontrolled and requested allowable emissions rate. The permit will specify the most volatile category of liquids that may be stored in each tank. Include appropriate tank-flashing modeling input data. Use additional sheets if necessary. Unit and stack numbering must correspond throughout the application package.

Printed 4/26/2024 3:38 PM

Include appropriate tank-flashing modeling input data. Use an addendum to this table for unlisted data categories. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary. See reference Table 2-L2. Note: 1.00 bbl = 10.159 M3 = 42.0 gal

[illegible]

Table 2-L2: Liquid Storage Tank Data Codes Reference Table

Roof Type	Seal Type, Welded Tank Seal Type		Seal Type, Riveted Tank Seal Type		Roof, Shell Color	Paint Condition
FX: Fixed Roof	Mechanical Shoe Seal	Liquid-mounted resilient seal	Vapor-mounted resilient seal	Seal Type	WH: White	Good
IF: Internal Floating Roof	A: Primary only	A: Primary only	A: Primary only	A: Mechanical shoe, primary only	AS: Aluminum (specular)	Poor
EF: External Floating Roof	B: Shoe-mounted secondary	B: Weather shield	B: Weather shield	B: Shoe-mounted secondary	AD: Aluminum (diffuse)	
P: Pressure	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	LG: Light Gray	
Note: 1.00 bbl = 0.159 M ³ = 42.0 gal					MG: Medium Gray	
					BL: Black	
					OT: Other (specify)	

Note: $1.00 \text{ bbl} = 0.159 \text{ M}^3 = 42.0 \text{ gal}$

Table 2-M: Materials Processed and Produced (Use additional sheets as necessary.)

[illegible]

Enter Continuous Emissions Measurement (CEM) Data in this table. If CEM data will be used as part of a federally enforceable permit condition, or used to satisfy the requirements of a state or federal regulation, include a copy of the CEM's manufacturer specification sheet in the Information Used to Determine Emissions attachment. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

[illegible]

Table 2-O: Parametric Emissions Measurement Equipment

Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

[illegible]

Table 2-P: Greenhouse Gas Emissions

Applications submitted under 20.2.70, 20.2.72, & 20.2.74 NMAC are required to complete this Table. Power plants, Title V major sources, and PSD major sources must report and calculate all GHG emissions for each unit. Applicants must report potential emission rates in short tons per year (see Section 6.a for assistance). Include GHG emissions during Startup, Shutdown, and Scheduled Maintenance in this table. For minor source facilities that are not power plants, are not Title V, or are not PSD, there are three options for reporting GHGs 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHG as a second separate unit; OR 3) check the following box.

☒ By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

		CO ₂ ton/yr	N ₂ O ton/yr	CH ₄ ton/yr	SF ₆ ton/yr	PFC/HFC ton/yr ²									Total GHG Mass Basis ton/yr ⁴	Total CO ₂ e ton/yr ⁵
Unit No.	GWP _s ¹	1	298	25	22,800	footnote 3										
A-01	mass GHG	12533.13	0.024	0.24											12533.39	
	CO ₂ e	12533.13	7.152	6.00												12546.28
A-02	mass GHG	12533.13	0.024	0.24											12533.39	
	CO ₂ e	12533.13	7.152	6.00												12546.28
A-03	mass GHG	12533.13	0.024	0.24											12533.39	
	CO ₂ e	12533.13	7.152	6.00												12546.28
SSM	mass GHG	0.17	-	411.7											411.87	
	CO ₂ e	0.17	-	10292.5												10292.67
	mass GHG															
	CO ₂ e															
	mass GHG															
	CO ₂ e															
	mass GHG															
	CO ₂ e															
	mass GHG															
	CO ₂ e															
	mass GHG															
	CO ₂ e															
	mass GHG															
	CO ₂ e															
	mass GHG															
	CO ₂ e															
	mass GHG															
	CO ₂ e															
	mass GHG															
	CO ₂ e															
Total	mass GHG	37599.56	0.072	412.42											38012.05	
	CO ₂ e	37599.56	21.456	10310.5												47931.52

¹ GWP (Global Warming Potential): Applicants must use the most current GWPs codified in Table A-1 of 40 CFR part 98. GWPs are subject to change, therefore, applicants need to check 40 CFR 98 to confirm GWP values.

² For HFCs or PFCs describe the specific HFC or PFC compound and use a separate column for each individual compound.

³ For each new compound, enter the appropriate GWP for each HFC or PFC compound from Table A-1 in 40 CFR 98.

⁴ Green house gas emissions on a **mass basis** is the ton per year green house gas emission before adjustment with its GWP.

⁵ CO₂e means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the green house gas by its GWP.

Section 3

Application Summary

The **Application Summary** shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

The **Process Summary** shall include a brief description of the facility and its processes.

Startup, Shutdown, and Maintenance (SSM) routine or predictable emissions: Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions.

Roswell Compressor Station is owned and operated by El Paso Natural Gas Company, LLC (EPNG), a Kinder Morgan company. It is located in Chaves County, New Mexico. The facility is currently operating under Operating Permit P128-R4 and NSR Permit 3375-M1. Operating Permit P128-R4 expires on 07/23/2025 and EPNG is submitting this application for the renewal of the operating permit, pursuant to 20.2.70.300.B.(2) NMAC, which requires the Title V renewal application to be submitted at least twelve months prior to expiration of the current permit.

This facility is a natural gas compression facility; the facility compresses pipeline quality natural gas for transportation through transmission pipelines.

One technical revision and one administrative revision has been made to Roswell Compressor Station since the previous Title V Renewal. Additionally, names, addresses, telephone numbers, and other administrative information have been updated where applicable. The revisions are detailed below:

3375M1R1

This technical revision added Alternative Test Method ALT-082 as an alternative for 40 CFR 60, Appendix A, Reference Method 9 for monitoring opacity at Roswell Compressor Station as required by 20.2.61.114 NMAC and current Operating Permit P128-R4. The use ALT-082 was approved during a pre-application meeting with NMED on December 05, 2023.

Additionally, Oxidation catalysts were authorized to be added to the existing 3400 hp Clark TLA-10 engines (A-01, A-02, and A-03) at this facility to reduce CO emissions to 11.2 tpy per this facility's ACP.

3375M1R2

Administrative revision to correct a rounding error for hourly CO emissions.

Section 4

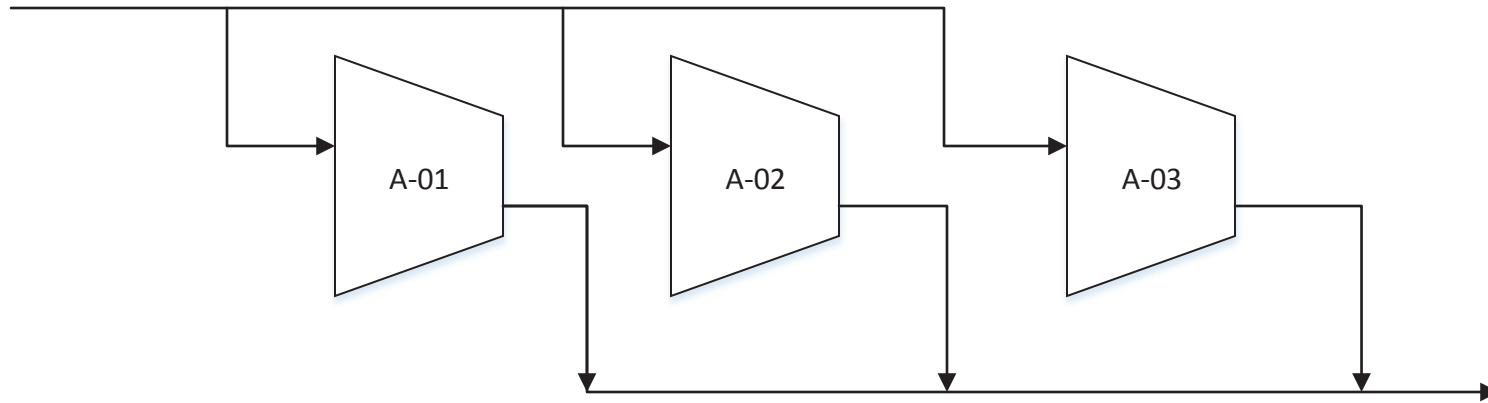
Process Flow Sheet

A **process flow sheet** and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.

A process flow diagram for the facility is attached. Insignificant or trivial activities and low vapor pressure storage tanks are not included in the process flow diagram.

Process Flow Diagram

EPNG Roswell Compressor Station



Section 5

Plot Plan Drawn to Scale

A **plot plan drawn to scale** showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

A plot plan is attached.



Section 6

All Calculations

Show all calculations used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

Tank Flashing Calculations: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

SSM Calculations: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowables Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

Glycol Dehydrator Calculations: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

Road Calculations: Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

Significant Figures:

- A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.
- B. At least 5 significant figures shall be retained in all intermediate calculations.
- C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

- (1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed.
- (2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
- (3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
- (4) The final result of the calculation shall be expressed in the units of the standard.

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

Emission units at the Roswell Compressor Station include the following:

1. Three 2-Stroke Lean-Burn Clark TLA-10 natural gas-fueled compressor engines.
2. Compressor and associated piping blowdown emissions during routine and predictable startup, shut down, and/or maintenance (SSM), and emissions from malfunctions.
3. A number of insignificant storage tanks that are exempt from 20.2.70 NMAC requirements.

Clark TLA-10 Engines (Units A-01, A-02, A-03)

The attached emission calculations are based on the vendor's specifications, 1.5 g/hp-hr NO_x and 2.0 g/hp-hr CO, with a safety factor. The emissions factor for VOC is from U.S. EPA, AP-42, Section 3.2 Natural Gas-fired Reciprocating Engines, Table 3.2-1 Uncontrolled Emission Factors for 2-stroke lean-burn engines. SO₂ emissions were calculated based on fuel consumption and maximum fuel sulfur content of 5 gr S/100 scf.

HAP emissions are calculated using the latest edition of GRI-HAPCalc, version 3.01, based on the most conservative emission factor (EF).

Stack temperature is an engineering estimate based on previous test data, exhaust flow rate is based on AGA data, and stack height and diameter are as currently constructed.

Startup, Shutdown, and Maintenance

This application seeks to continue to incorporate the following SSM Emissions (as authorized by the NSR permits 3375 M1) into the operating permit.

- Natural Gas venting after unit shutdown ("unit blowdown")
- Natural Gas venting scheduled facility shutdowns ("station blowdown")

Again, EPGN requests that both routine and predictable startup and shutdown events and malfunction events be authorized by this operating permit action.

Unit Blowdown

The attached spreadsheet shows the estimated VOC emissions and H₂S emissions per unit blowdown event, as well as the estimated annual blowdown emissions based on an estimated annual volume and typical gas analysis. Please note however, that the annual estimate includes both unit blowdowns and station blowdowns (which are discussed here).

Station Blowdown

The attached spreadsheets show the estimated emissions of VOC and H₂S per station blowdown event. The annual emissions related to station blowdown are estimated based on two planned station blowdowns per year.

EPNG requests a total limit of 10 tons per year of VPC for compressor and station blowdowns during startup, shutdown, scheduled maintenance, or malfunctions. EPNG also requests that reporting of upsets/malfunctions as "excess emissions" only be required when emissions are in excess of this limit, in accordance with 20.2.7 NMAC.

Exempt Units/Activities

Roswell Compressor Station also includes six lubricating oil storage tanks, an antifreeze tank, a waste water tank, a Stoddard solvent tank, and facility-wide fugitive emissions. These are insignificant activities as described in the *New Mexico Environment Department (NMED) Air Quality Bureau (ABQ) Operating Permit Program List of Insignificant Activities March 24, 2005*. Fugitive emissions were calculated using GRI-HAPCalc 3.01 with an added safety factor.

Section 6.a

Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC) applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO₂e emissions from your facility.
2. GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO₂e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
4. Report GHG mass and GHG CO₂e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO₂e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following ☐ By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at <http://www.epa.gov/ttn/chief/ap42/index.html>
- EPA's Internet emission factor database WebFIRE at <http://cfpub.epa.gov/webfire/>
- 40 CFR 98 Mandatory Green House Gas Reporting except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.
- API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.
- Sources listed on EPA's NSR Resources for Estimating GHG Emissions at <http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases>:

Global Warming Potentials (GWP):

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO₂ over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. **(20.2.70.7 NMAC, 20.2.74.7 NMAC)**. You may also find GHGs defined in 40 CFR 86.1818-12(a).

Metric to Short Ton Conversion:

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.

1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

Emission Summary

Uncontrolled Emissions																					
Unit No.	Description	NOx		CO		VOC		SOx		PM		PM ₁₀		PM _{2.5}		H ₂ S		HAPs		Formeldahyde	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
A-01	Compressor Engine	17.99	78.79	17.99	78.79	3.67	16.08	0.38	1.67	1.18	5.18	1.18	5.18	1.18	5.18	-	-	2.87	12.56	1.68	7.37
A-02	Compressor Engine	17.99	78.79	17.99	78.79	3.67	16.08	0.38	1.67	1.18	5.18	1.18	5.18	1.18	5.18	-	-	2.87	12.56	1.68	7.37
A-03	Compressor Engine	17.99	78.79	17.99	78.79	3.67	16.08	0.38	1.67	1.18	5.18	1.18	5.18	1.18	5.18	-	-	2.87	12.56	1.68	7.37
SSM	Startup, Shutdown, Maintenance	-	-	-	-	-	10.00	-	-	-	-	-	-	-	-	0.068	3.61E-03	-	-	-	-
Summary:		53.97	236.38	53.97	236.38	11.02	48.25	1.14	5.00	3.55	15.54	3.55	15.54	3.55	15.54	0.068	3.61E-03	8.60	37.68	5.05	22.11

Controlled Emissions ¹																					
Unit No.	Description	NOx		CO		VOC		SOx		PM		PM ₁₀		PM _{2.5}		H ₂ S		HAPs		Formaldahyde	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
A-01	Compressor Engine	17.99	78.79	2.55	11.16	3.67	16.08	0.38	1.67	1.18	5.18	1.18	5.18	1.18	5.18	-	-	2.87	12.56	1.68	7.37
A-02	Compressor Engine	17.99	78.79	2.55	11.16	3.67	16.08	0.38	1.67	1.18	5.18	1.18	5.18	1.18	5.18	-	-	2.87	12.56	1.68	7.37
A-03	Compressor Engine	17.99	78.79	2.55	11.16	3.67	16.08	0.38	1.67	1.18	5.18	1.18	5.18	1.18	5.18	-	-	2.87	12.56	1.68	7.37
SSM	Startup, Shutdown, Maintenance	-	-	-	-	-	10.00	-	-	-	-	-	-	-	-	0.068	3.61E-03	-	-	-	-
Summary:		53.97	236.38	7.64	33.48	11.02	48.25	1.14	5.00	3.55	15.54	3.55	15.54	3.55	15.54	0.068	3.61E-03	8.60	37.68	5.05	22.11

El Paso Natural Gas

Roswell Compressor Station

Unit: A-01, A-02, A-03

Description: Clark TLA-10 NG 2SLB RICE

Sea level hp: 3400 hp Manufacturer's data

Elevation: 3845 msl NMED/AQB Policy 02.07-01

Derate: 0.0% 3% per 1000 ft over 4000 ft

Site hp: 3400 hp Sea level hp * (100% - derate)

Emission Calculations

Uncontrolled Emissions

NOx	CO	NMHC	SO ₂ ¹		
1.5	2.0			g/hp-hr	Vendor data
		0.12		lb/MMBtu	AP-42 Table 3.2-1
60%	20%	25%		safety factor	
2.40	2.4	0.2		g/hp-hr	
17.99	17.99	3.67	0.38	lb/hr	Hourly emission rate
78.79	78.79	16.08	1.67	tpy	Annual emission rate (8760 hrs/yr)

Controlled emissions

NOx	CO	NMHC	SO ₂ ¹		
1.5	0.3			g/hp-hr	Vendor data
		0.12		lb/MMBtu	AP-42 Table 3.2-1
	86%			Oxidation Catalyst Reduction	
60%	20%	25%		safety factor	
2.40	0.3	0.2		g/hp-hr	
17.99	2.55	3.67	0.38	lb/hr	Hourly emission rate
78.79	11.16	16.08	1.67	tpy	Annual emission rate (8760 hrs/yr)

¹ SO₂ emissions based on fuel sulfur content of 5 gr S/100 scf, or 0.00714 lb S/Mscf.
0.00714 lb S/Mscf * fuel consumption (Mscf/hr) * 64 lb SO₂/32 lb S = lb/hr SO₂

HAP Emissions

HAP emissions calculated using GRI-HAPCalc 3.01

Formaldehyde	Methanol	Acetaldehyde	Acrolein	Styrene	Xylenes	2,2,4-TMP	n-Hexane	Total HAPS	
1.6826	0.1067	0.1770	0.0970	0.1860	0.0947	0.2070	0.1177	2.8674	lb/hr
7.3699	0.4674	0.7752	0.4250	0.8147	0.4146	0.9066	0.5156	12.5594	tons/yr

Fuel Consumption

BSFC: 7200 Btu/hp-hr Vendor Data

Fuel heat value: 919 Btu/scf Nominal for natural gas

Heat input: 24.5 MMBtu/hr BSFC * site hp

Fuel consumption: 26.6 Mscf/hr Heat input / fuel heat value

Annual fuel usage: 233.3 MMscf/yr 8760 hrs/yr operation

Exhaust Parameters

Exhaust temp (Ta): 623 °F Avg. Test Data

Exhaust flow: 36365 acfm Test data--see below

Stack diameter: 2 ft Design

Exhaust velocity: 192.9 ft/sec Exhaust flow / stack area

Stack height: 32 ft Design

Test Data

average test flow 877713 dsfch

Moisture % 5% nominal for IC engines

Average test flow 36365 acfm dscfh/60 * Ta/Ts * Ps/Pa / 100%-moisture

Standard Pressure (Ps) 29.92 in Hg

Pressure at Elevation 25.99 in Hg Hess, Introduction to Theoretical Meteorology, eqn. 6.8

Standard Temperature (Ts) 528 R

Unit:	Aux-A1
Description:	Caterpillar 3512 Engine
Type:	4 SLB

Horsepower:	680 hp	
Fuel consumption:	7700 Btu/hp-hr	
Fuel heat value:	919 Btu/scf	
Heating rate:	5.24 MMBtu/hr	
Fuel usage:	5697.5 scf/hr	
	2.8 MMscf/yr	500 hrs/yr
Operating hours:	500 hrs/year	

Uncontrolled Emissions

NO_x ¹	CO ¹	VOC ¹	SO₂ ²	TSP ³	HAPs ⁴		
4.08	0.32	0.12	5.88E-04	9.99E-03		lb/MMBTU tons/year	AP42 Table 3.2-2 GriHap Calc 3.01
21.36	1.66	0.62	8.14E-02	5.23E-02	0.36	lb/hr	
5.34	0.41	0.15	2.03E-02	1.31E-02	0.089	tpy	Based on 500 hours.
Formaldehyde	Methanol	Acetaldehyde	Acrolein	Styrene	Xylenes	2,2,4-TMP	n-Hexane
0.261	0.012	0.041	0.026		0.008	0.012	0.006 lb/hr
0.065	0.003	0.010	0.006	-	2.00E-03	3.00E-03	0.001 tons/yr
							Based on 500 hours.

¹ NO_x, CO, VOC, SO₂, & TSP are based on Ap42 emission factors

² SO₂ emissions based on fuel sulfur content of 5 gr S/100 scf, or 0.00714 lb S/Mscf. 0.00714 lb S/Mscf * fuel consumption (Mscf/hr) * 64 lb SO₂/32 lb S = lb/hr SO₂

³ It is assumed that TSP = PM₁₀ = PM_{2.5}, PM emissions are derived from AP-42 emissions factors and converted to g/hp-hr using engine specifications.

⁴ Total HAPs were calculated using GRI Hap Calc 3.01.

Roswell Compressor Station

Unit: SSM

Description: Facility-wide SSM emissions

Maintenance/Startup/Shutdown/Malfunction Emissions**Gas Analysis (Typical)**

VOC weight %:	2.00%	Nominal
CO2 weight %:	2.00%	Nominal
CH4 weight %:	90%	Nominal
Gas molecular weight:	17.00 lb/lb-mol	Nominal
Gas molar volume:	378.61 scf/lb-mol	Constant
Gas density:	0.0449 lb/scf	Gas MW / Molar volume

Compressor Blowdown Venting (BD-Unit)**SSM/M1 Emission Rates, Per Event**

Event Description: Planned Maintenance and Normal Shutdown or Malfunction

Volume per event:	21 Mscf/event	Estimated (varies)
VOC Emissions:	18.9 lb/event	lb/scf * scf/event * VOC wt %
CO2 Emissions	18.9 lb/event	lb/scf * scf/event * CO2 wt %
CH4 Emissions	848.6 lb/event	lb/scf * scf/event * CH4 wt %

SSM/M1 Emission Rates, Annual

Annual volume:	20000 Mscf/yr	Estimated worst-case
VOC Emissions:	9.0 tons/yr	Gas density (lb/scf) * Mscf/yr * 1000 * VOC wt % * ton/2000 lb
CO2 Emissions	9.0 tons/yr	Gas density (lb/scf) * Mscf/yr * 1000 * CO2 wt % * ton/2000 lb
CH4 Emissions	404.1 tons/yr	Gas density (lb/scf) * Mscf/yr * 1000 * CH4 wt % * ton/2000 lb

Facility Blowdown Venting (BD-Facility)**SSM/M1 Emission Rates, Per Event**

Event Description: Station ESD

Volume per event:	189 Mscf/event	Estimated (varies)
VOC Emissions:	169.7 lb/event	lb/scf * scf/event * VOC wt %
CO2 Emissions	169.7 lb/event	lb/scf * scf/event * CO2 wt %
CH4 Emissions	7637.7 lb/event	lb/scf * scf/event * CH4 wt %

SSM/M1 Emission Rates, Annual

Annual volume:	189 Mscf/yr	2 planned events per year
VOC Emissions:	0.17 tons/yr	lb/event * 1 event/yr * ton/2000 lb
CO2 Emissions	0.17 tons/yr	lb/event * 1 event/yr * ton/2000 lb
CH4 Emissions	7.64 tons/yr	lb/event * 1 event/yr * ton/2000 lb

Total VOC Emissions	9.1 tons/yr	(10 tpy limit requested for all SSM and M1 emissions)
Total CO2 Emissions	9.1 tons/yr	
Total CH4 Emissions	411.7 tons/yr	
Total CO ₂ e Emissions	8,655.85 tons/yr	

SSM/M1 Emissions

Unit: SSM/M1

Description: Facility-wide startup, shutdown, maintenance and malfunction emissions

Gas Analysis (Typical)

H_2S	0.25	gr H_2S	Nominal (Max amount allowed in pipeline quality natural gas)
	100	scf	

Turbine Blowdown Venting (BD-Unit)

SSM Emission Rates, Per Event

Event Description: Planned Maintenance and Normal Shutdown

Volume per event: 21 Mscf/event Estimated (varies)

 H_2S Emissions: 0.008 lb/event gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume: 20000 Mscf/yr Expected blowdown volume

 H_2S Emissions: 0.0036 tons/yr gr/scf * scf/event * 1lb/7000gr * ton/2000 lb

Facility Blowdown Venting (BD-ESD)

SSM Emission Rates, Per Event

Event Description: Station ESD

Volume per event: 189 Mscf/event Estimated (varies)

 H_2S Emissions: 0.068 lb/event gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume: 189 Mscf/yr Expected blowdown volume

 H_2S Emissions: 3.38E-05 tons/yr gr/scf * scf/event * 1lb/7000gr * ton/2000 lbFacility H_2S Total: 0.0036 tons/yr

Facility Blowdown Total

H_2S Emissions:	0.0036 tons/yr
-------------------	----------------

Facility-Wide SSM/M Total

H_2S	
0.0036	tons/yr

Roswell Compressor Station

Unit: F-001

Description: Facility-wide fugitive emissions

Emission Calculations¹

Components	Gas Service	Light Liquid Service	Heavy Liquid Service
Connections	737	0	0
Flanges	120	0	0
OELs	14	0	0
Pumps	0	0	0
Valves	257	0	0
Others	30	0	0

VOC Emissions

0.5561	tpy ²
75%	safety factor
0.22	lb/hr ³
0.97	tpy ⁴

¹ Default component count from GRI-HAPCalc 3.01

² Emission rate calculated with GRI-HAPCalc 3.01

³ lb/hr = tons/yr * 2000lb/ton * 1yr/8760hr

⁴ Yearly emission rate with safety factor = tpy * (1 + SF)

Section 7

Information Used to Determine Emissions

Information Used to Determine Emissions shall include the following:

- ☐ If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
 - ☐ If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
 - ☐ If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
 - ☐ If an older version of AP-42 is used, include a complete copy of the section.
 - ☐ If an EPA document or other material is referenced, include a complete copy.
 - ☐ Fuel specifications sheet.
 - ☐ If computer models are used to estimate emissions, include an input summary (if available) and a detailed report, and a disk containing the input file(s) used to run the model. For tank-flashing emissions, include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., permit or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.
-

This section contains the following documentation to support emission calculations in Section 6:

Clark TLA-10 Engines (units A-01, A-02, A-03)

- Manufacturer's Specifications and internal test data
- AP-42 Table 3.2-1
- GRI-HAPCal 3.01 outputs
- Oxidation Catalyst
 - o Calculated per this facility's Alternate Compliance Plan. The full approved ACP is located in section 20 of the application for reference



HOERBIGER
Compression Technology

Proposal Number: GES-EA0156

February 7, 2006

Robert L. Gamble, Jr.
El Paso Natural Gas Company
2 North Nevada Avenue
Colorado Springs, CO 80903

HOERBIGER GAS ENGINE SYSTEMS
14425 Torrey Chase Blvd., 300
Houston, Texas 77014
Tel (281) 866-8883
Fax (281) 866-0164
E-mail: mail@hoerbigercorp.com
Web site: www.hoerbigercorp.com

RE: Roswell Station Engine NOx Reduction Project

Dear Mr. Robert L. Gamble, Jr.

Hoerbiger Service Incorporated, Gas Engine Systems Division (GES) is pleased to respond to your request for quote. This is a fixed price, turn-key proposal for the scope of work listed in Section 1. GES reserves the right to correct clerical errors in this Proposal.

GES agrees to provide to El Paso Natural Gas, the Customer, all of the equipment, engineering, installation, and documentation necessary to install equipment listed in section 1.1 on 3 TLA-10 engines located at the Roswell Station. GES guarantees that the addition of this equipment will allow the unit to operate with the guaranteed performance levels listed in section 6.1.

Total price for 3 TLA-10's (excludes options and spares)	\$2,136,366
Price of recommended spare parts	\$45,410
CPM-HyperBalance option (total for all 3 units)	\$215,464
3-way AMT control valve option (total for all 3 units)	\$23,865
Turbocharger map option	\$27,484
ET24 Turbocharger option (total for all 3 units)	\$133,705

The above pricing reflects a 5.8125% tax.

GES is offering the following discounts to the customer if the choose to re-deploy some of the equipment that has been purchased for use in Kentucky. A complete list of the proposed materials that could be reused can be found in section 1.3.5.

Available Discounts

Re-deploy Kentucky HyperFuel Materials	(\$176,451)
Re-deploy Kentucky HyperFuel Spares	(\$42,651)
Re-deploy Kentucky CPM-HyperBalance System	(\$91,900)

Technical Description

GES has determined that a layered technology approach of improved charge air delivery, pre-chambers, and enhanced mixing (HyperFuel™ Valve System) will be required to meet the primary project requirements of 1.5 g/bhp-hr NOx (operating) and ≤ 2.0 g/bhp-hr CO. While

Aftercooler

GES is proposing the use of new off-engine mounted aftercoolers for all 3 units. Currently, units 1 and 2 have engine mounted turbochargers and in-block aftercoolers while unit 3 uses an off mounted turbocharger and aftercooler design. GES considered the options of upgrading the in-block aftercoolers for units 1&2 or, converting units 1&2 to an off mounted cooler design like unit 3. As the proposed turbochargers will be mounted off engine, the most cost effective design is to implement a single off-engine mounted aftercooler for each unit. This approach allows all 3 units to adopt a common configuration, makes maintenance of the system much easier to perform and ensures a consistent cylinder to cylinder charge air temperature.

Ignition System (Pre-Chambers)

GES is proposing use of Cooper EcoJet™ pre-chambers for the Roswell units. TLA series engines equipped with enhanced mixing operate reliable at levels ≥ 2.5 g/bhp-hr NOx without pre-chambers. For operation below this level, pre-chambers are necessary to stabilize combustion and ensure operating integrity. Pre-chambers bring their own set of problems, as they run rich and can contribute significantly to carbon based engine pollutants like CO, THC and CH₂O. To minimize this contribution, GES has selected pre-chambers with the smallest combustion volume that will still ensure consistent ignition and is recommending only 1 pre-chamber per cylinder. Previous installations using this approach have shown that the combination provides a solid ignition for the required level of performance.

HyperFuel Valve™ System

The data supplied showed the machines currently operate just in excess of 2 g/bhp-hr CO – a level consistent with stock TLA performance. The only combustion technology available to address CO formation is enhanced mixing. Hoerbiger's HyperFuel Valve™ System is an enhanced mixing technology and has demonstrated CO reduction approaching 50% as compared to baseline TLA performance. The application of HyperFuel™ Valve System technology to the TLA will reduce the baseline operating CO to a nominal operating level of 1.5 g/bhp-hr, even with the addition of pre-chambers, providing margin and ensuring broad range compliance with the CO requirement. Additionally, the HyperFuel Valve™ System will reduce baseline THC by approximately 30%, easily making room for the expected pre-chamber contribution and still ensuring THC emissions below the pre-retrofit baseline.

In 2003, El Paso pre-purchased a number of HyperFuel Valve™ Systems for installation in Kentucky to meet expected regulations in that state. While all of the materials were acquired, the systems were not installed. El Paso has recently notified GES that the state has accepted an alternative approach and that the equipment slated for the Kentucky locations will not be needed. El Paso has requested that GES look at all upcoming projects and see if the equipment can be re-deployed. Three of the Kentucky units were Clark TCV 16's, as the TCV and TLA valve cartridges are the same part number, these valves can be used in the TLA's at Roswell without modification. The control systems, valves, filters and fittings were all purchased for these projects and are available for re-

ENGINE TEST 1 TEST SITE 2 EXHAUST STACK AREA SQ. FT. 4.666
 CLARK TLA-10 RATED 3400 HP AT 300 RPM, 2-STROKE TC
 SOURCE: PR-15-425 HCR-3.93 NOX-CLH CO-NDIR HC-FID O2-POL FLOW-CB

RUN	1	2	3	4	5
DATE	3/13/85	3/13/85	3/14/85	3/14/85	3/14/85
TIME	1500	1600	1031	1245	1325

OPERATIONAL DATA

BAROMETER IN. HG.	28.60	28.60	28.76	28.75	28.75
AMBIENT TEMP. DEG. F	61	60	62	71	68
INLET MAN. TEMP DEG. F	82	84	88	90	90
EXHAUST VEL. FT/SEC	97.39	99.24	93.56	95.58	100.28
SP. HUMIDITY GRAIN/LB	31	25	29	31	26
ENGINE SPEED RPM	300	300	300	300	300
HORSEPOWER	3409	3394	2943	2834	2844
SCAV. AIR PRES. IN. HG.	13.5	15.0	12.6	15.1	16.9
IGNIT. TIME DEG. BTDC	9.0	9.0	9.0	9.0	9.0
FUEL SP. GR. (STP)	0.6095	0.6092	0.6166	0.6182	0.6182
HI HEAT VALUE BTU/SCF	911	912	885	882	882
LO HEAT VALUE BTU/SCF	820	822	798	795	795
CALC. EXH. FLOW LB/HR	51034	52878	50423	53991	57404
EXHAUST SP. GR. (STP)	0.9806	0.9814	0.9815	0.9822	0.9840
EXHAUST TEMP. DEG. F	756	736	729	674	659
FUEL FLOW SCF/HR	30614	30332	28095	28355	28626
FUEL MIL. BTU/HR (HHV)	27.884	27.672	24.876	25.020	25.260
FUEL FLOW LB/HR	1427	1413	1325	1341	1354
AIR FLOW LB/HR (WET)	49607	51465	49098	52650	56051
AIR/FUEL RATIO (WET)	34.8	36.4	37.1	39.3	41.4
BSFC BTU/HP HR (HHV)	8179	8153	8453	8829	8882
EXHAUST H2O PERCENT	8.67	8.14	7.78	7.40	6.78

EMISSIONS AS MEASURED

NOX PPM	1335.00	1107.00	754.00	564.00	378.00
NO PPM	1185.00	1001.00	688.00	520.00	301.00
NO2 PPM	150.00	106.00	66.00	44.00	77.00
CO2 PERCENT	4.41	4.17	3.90	3.59	3.35
HC PPM	1020.00	1373.00	1344.00	1903.00	2218.00
CO PPM	464.00	378.00	373.00	329.00	329.00
O2 PERCENT	13.25	13.37	13.63	14.50	15.13
NO/NOX	0.888	0.904	0.912	0.922	0.796
NON-METH/TOTAL HC	ND	ND	ND	ND	ND

CALCULATED EMISSIONS

NOX LB/HR	101.488	87.629	57.131	45.914	32.880
HC LB/HR TOTAL	26.958	37.784	35.414	53.871	67.089
HC LB/HR NON-METH	ND	ND	ND	ND	ND
CO LB/HR	20.390	17.340	16.425	15.615	16.726
NOX LB/MIL BTU	3.640	3.167	2.297	1.835	1.302
HC LB/MIL BTU TOTAL	0.967	1.365	1.424	2.153	2.656
HC LB/MIL BTU NON-METH	ND	ND	ND	ND	ND
CO LB/MIL BTU	0.731	0.627	0.660	0.624	0.662
NOX G/BHP HR	13.504	11.711	8.805	7.349	5.244
HC G/BHP HR TOTAL	3.587	5.050	5.458	8.622	10.700
HC G/BHP HR NON-METH	ND	ND	ND	ND	ND
CO G/BHP HR	2.713	2.317	2.531	2.499	2.668
NOX PPM CORR TO 15 PCT O2	1030	869	612	520	387

NOTE: NOX AS NO2 AND BTU AS HHV FOR CALCULATED EMISSIONS



Gas Industrial Engine

G3512

525-1005 hp

Standard and Low Emission

SPECIFICATIONS

V-12, 4-Stroke-Cycle, Spark Ignited

Bore—in (mm)..... 6.7 (170)

Stroke—in (mm)..... 7.5 (190)

Displacement—cu in (L)..... 3158 (51.8)

Compression Ratio

STD 9:1

LE 8:1

Aspiration Naturally Aspirated or
Turbocharged-Aftercooled

Lube Oil Capacity — gal (L)

STD* 116 (493)

STD** 128 (483)

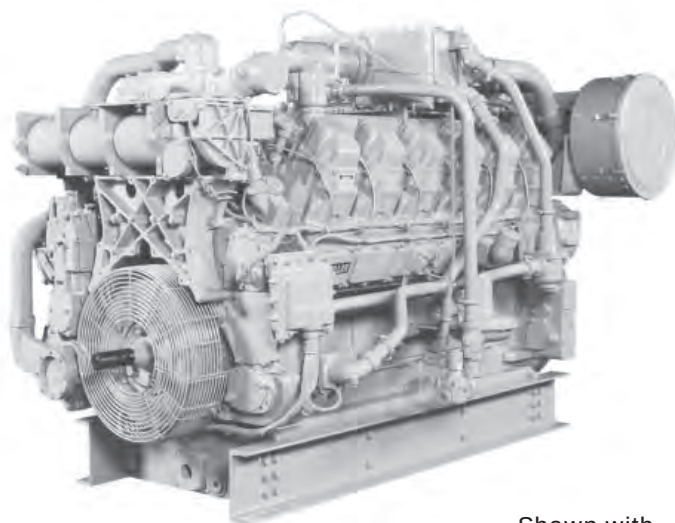
LE 81 (307)

Jacket Water System — gal (L)

Capacity w/o Radiator 39 (148)

* Oil fill capacity with 14 elements

** Oil fill capacity without elements



Shown with
Optional Equipment



FEATURES

■ DIESEL STRENGTH

All Caterpillar® gas engines are built on diesel frames which means greater service life. Caterpillar gas engines inherit more from their diesel counterparts than just strength. They are backed by the same support system recognized as one of the most sophisticated and dependable in the world.

■ APPLICATION FLEXIBILITY

Broad operating speed range and ability to burn a wide spectrum of gaseous fuels.

■ LOW EMISSIONS

Low emission engines are capable of NO(x) levels as low as 2.0 grams/hp-hr. Lower emissions may be achievable for selected applications. Consult your Caterpillar dealer.

■ CATERPILLAR® GAS ENGINES

Represent the latest technology in engine design. Engines are offered in both naturally aspirated and turbocharged/aftercooled configurations.

TA is offered as standard and low emission.

These different configurations offer:

- High energy ignition systems for consistent firing
- High efficient combustion chamber for complete burning of the fuel.
- Modern component design such as deep cup, oil gallery piston.

■ ELECTRONIC IGNITION SYSTEM WITH DETONATION SENSITIVE TIMING

The Caterpillar electronic ignition system provides optimized spark timing for all operating conditions. Timing is automatically controlled to maintain continuous detonation protection.

STANDARD EQUIPMENT

Air cleaners	oil pressure
single stage, dry,	differential
with service	intake manifold
indicator	temp (TA only)
Breather, crankcase	pressure (LE)
Carburetor	service meter
natural gas	exhaust pyrometer
Cooler	(LE)
lubricating oil	Lifting eyes
Filter	Manifold, exhaust
lubricating oil, RH	watercooled
Flywheel housing	Pumps, gear driven
SAE No. 00	aftercooler water
Governor	(TA only)
Woodward	jacket water
Ignition system	Rails, mounting, 10 in.
Altronic III or	Regulator, gas
Caterpillar E.I.S.	pressure
Instrument panel, RH	SAE standard rotation
8 gauge panel (STD)	Thermostats and
12 gauge panel (LE)	housing
oil pressure	Torsional vibration
coolant temperature	damper

OPTIONAL EQUIPMENT

Air to air aftercooler
connection
Air head for 3161
Cooling systems
high temp (LE only)
CSA ignition
Exhaust fittings
Low pressure gas
conversion
Muffler
Power takeoffs
Starting systems
Tachometer

CONTINUOUS RATINGS (BHP)

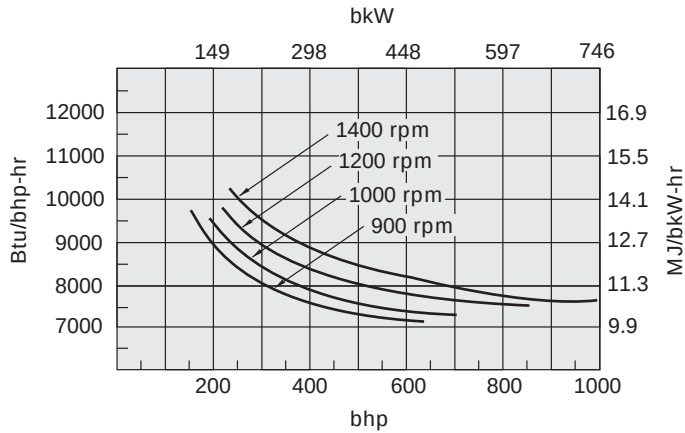
Aspiration	1400 rpm	1300 rpm	1200 rpm	1100 rpm	1000 rpm	900 rpm
LE-90, 8:1	1005	930	860	790	720	650
LE-130, 8:1	945	875	810	740	675	610
STD TA-90, 9:1	–	–	815	745	675	610
STD TA-130, 9:1	–	–	790	725	660	595
STD NA, 9:1	–	–	525	480	440	395

PHYSICAL FACTORS

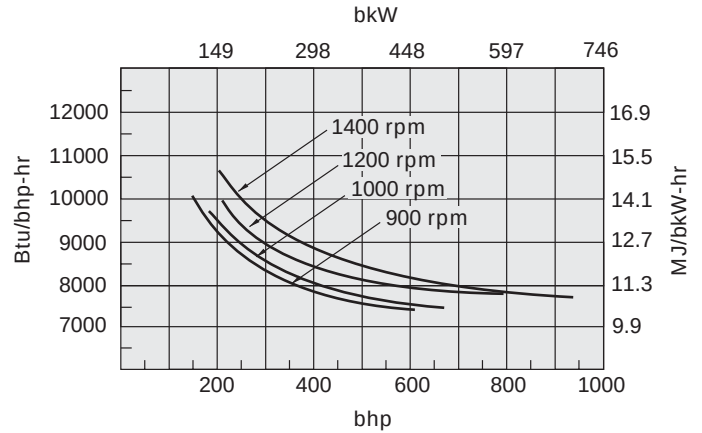
	Height in (mm)	Width in (mm)	Length in (mm)	Weight lb (kg)
LE	73.4 (1863)	67.1 (1703)	110 (2788)	14 650 (6651)
STD TA	73.4 (1863)	67.1 (1703)	110 (2788)	14 450 (6560)
STD NA	75.2 (1911)	64.7 (1642)	105 (2671)	13 400 (6084)

FUEL CONSUMPTION

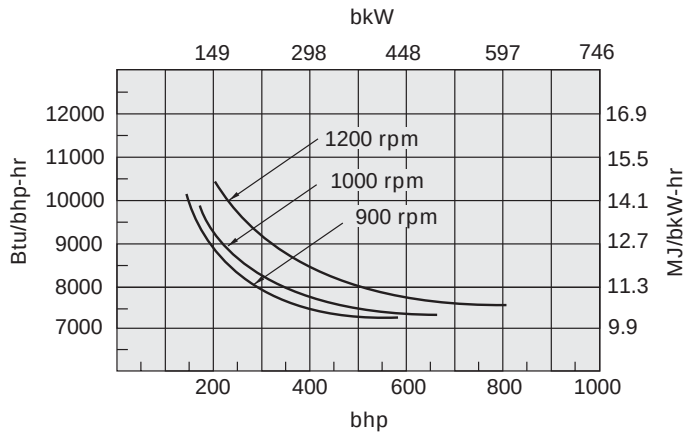
LE-90



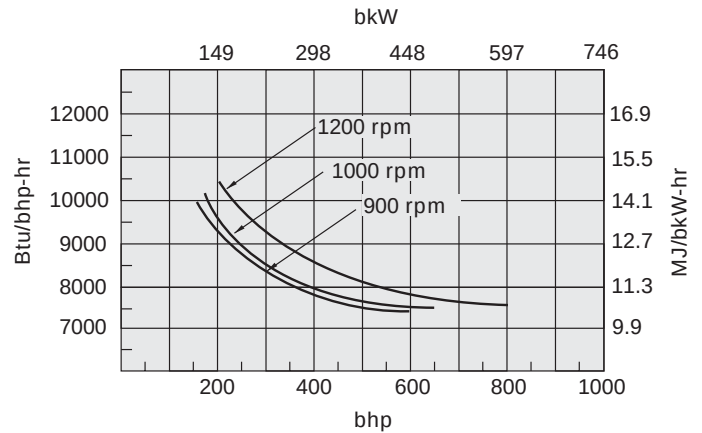
LE-130



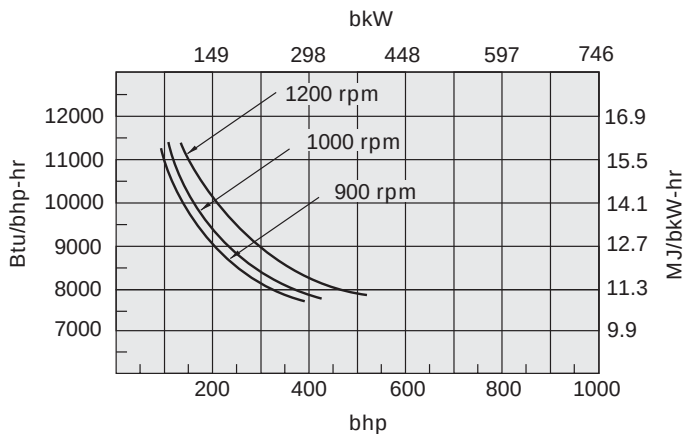
STD TA-90



STD TA-130

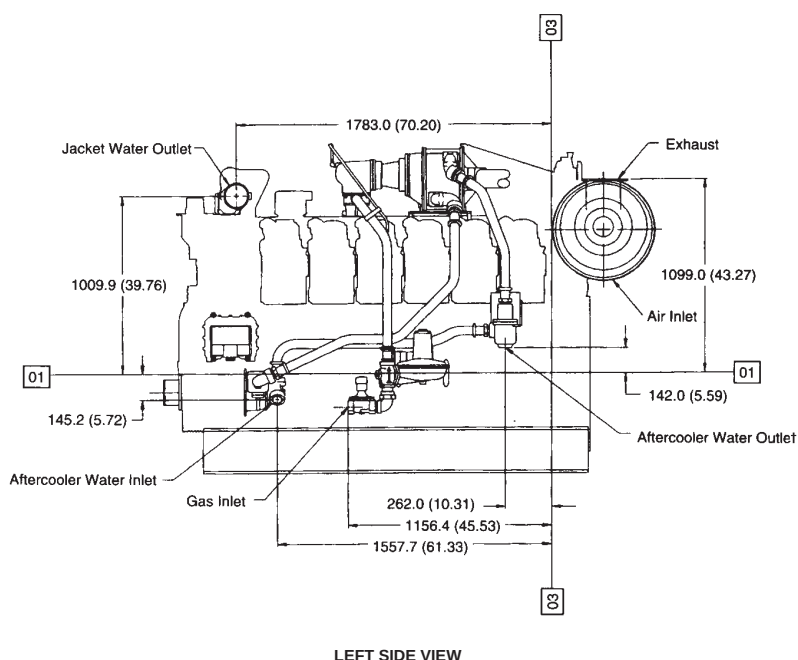
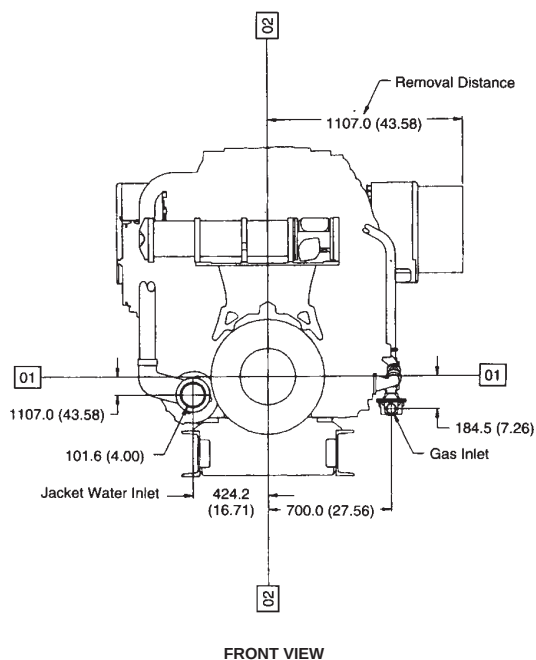


STD NA



LE refers to low emission engine configuration.
 STD refers to standard engine configuration.
 90 refers to aftercooler water inlet temperature in 90° F (32° C).
 130 refers to aftercooler water inlet temperature in 130° F (54° C).
 All data is based on standard conditions. 77° F (25° C) 500 ft Alt.
 These ratings do not allow for overload capability.

GAS INDUSTRIAL ENGINE



- 01 Centerline of Crankshaft
- 02 Centerline of Engine
- 03 Rear face of Cylinder Block

See general dimension drawing 119-9598 for additional Electronic Ignition System (E.I.S.) engine detail and NA information.

For magneto ignition system engines see general dimension drawing 7W-4444.

Note: General configuration not to be used for installation.

CONDITIONS AND DEFINITIONS

Ratings are based on SAE J1349 standard conditions of 29.61 in Hg (100 kPa) and 77° F (25° C). These ratings also apply at ISO3046, DIN6271, and BS5514 standard conditions of 29.61 in Hg (100 kPa), 81° F (27° C); and API 7B-11C standard conditions of 29.38 in Hg (99 kPa), 85° F (29° C).

Ratings are based on dry natural gas having a low heat value of 905 btu/ft³ (35.54 MJ/N m³). Variations in altitude, temperature, and gas composition from standard conditions may require a reduction in engine horsepower; contact your Caterpillar dealer.

Turbocharged-aftercooled ratings apply to 5000 ft (1525 m) and 77° F (25° C). **Naturally aspirated** engines apply to 500 ft (150 m) and 77° F (25° C). For applications which exceed these limits, consult your Caterpillar dealer.

Additional ratings may be available for specific customer requirements. Consult your Caterpillar representative for details.

GRI-HAPCalc® 3.01
Engines Report

Facility ID: KM ROSWELL
Operation Type: COMPRESSOR STATION
Facility Name: ROSWELL COMPRESSOR STATION
User Name:
Units of Measure: U.S. STANDARD

Notes:

Note: Emissions less than 5.00E-09 tons (or tonnes) per year are considered insignificant and are treated as zero.
These emissions are indicated on the report with a "0".
Emissions between 5.00E-09 and 5.00E-05 tons (or tonnes) per year are represented on the report with "0.0000".

Engine Unit

Unit Name: ENGINES

Hours of Operation: 8,760 Yearly
Rate Power: 3,400 hp
Fuel Type: NATURAL GAS
Engine Type: 2-Stroke, Lean Burn
Emission Factor Set: FIELD > EPA > LITERATURE
Additional EF Set: 2SLB CLARK

Calculated Emissions (ton/yr)

<u>Chemical Name</u>	<u>Emissions</u>	<u>Emission Factor</u>	<u>Emission Factor Set</u>
Ethyl Benzene	1.0333	0.03150000 g/bhp-hr	2SLB CLARK
HAPs			
Formaldehyde	7.3699	0.22468051 g/bhp-hr	2SLB CLARK
Methanol	0.4674	0.01424964 g/bhp-hr	2SLB CLARK
Acetaldehyde	0.7752	0.02363404 g/bhp-hr	2SLB CLARK
1,3-Butadiene	0.0960	0.00292727 g/bhp-hr	2SLB CLARK
Acrolein	0.4250	0.01295807 g/bhp-hr	2SLB CLARK
Benzene	0.2255	0.00687364 g/bhp-hr	2SLB CLARK
Toluene	0.2943	0.00897272 g/bhp-hr	2SLB CLARK
Ethylbenzene	0.0075	0.00023000 g/bhp-hr	2SLB CLARK
Xylenes(m,p,o)	0.4146	0.01263900 g/bhp-hr	2SLB CLARK
2,2,4-Trimethylpentane	0.9066	0.02764000 g/bhp-hr	2SLB CLARK
n-Hexane	0.5156	0.01572000 g/bhp-hr	2SLB CLARK
Phenol	0.0115	0.00035000 g/bhp-hr	2SLB CLARK
Styrene	0.8147	0.02483800 g/bhp-hr	2SLB CLARK
Naphthalene	0.0184	0.00056000 g/bhp-hr	2SLB CLARK
2-Methylnaphthalene	0.0085	0.00026000 g/bhp-hr	2SLB CLARK
Acenaphthylene	0.0013	0.00004000 g/bhp-hr	2SLB CLARK
Biphenyl	0.0010	0.00003000 g/bhp-hr	2SLB CLARK
Acenaphthene	0.0006	0.00001700 g/bhp-hr	2SLB CLARK
Fluorene	0.0008	0.00002400 g/bhp-hr	2SLB CLARK
Anthracene	0.0003	0.00000960 g/bhp-hr	2SLB CLARK
Phenanthrene	0.0015	0.00004600 g/bhp-hr	2SLB CLARK
Ethylene Dibromide	0.0079	0.00024220 g/bhp-hr	EPA
Fluoranthene	0.0001	0.00000320 g/bhp-hr	2SLB CLARK
Pyrene	0.0002	0.00000610 g/bhp-hr	2SLB CLARK

Benz(a)anthracene	0.0001	0.00000430 g/bhp-hr	2SLB CLARK
Chrysene	0.0002	0.00000760 g/bhp-hr	2SLB CLARK
Benzo(e)pyrene	0.0000	0.00000010 g/bhp-hr	EPA
Vinyl Chloride	0.0027	0.00008150 g/bhp-hr	EPA
Methylene Chloride	0.0159	0.00048520 g/bhp-hr	EPA
1,1-Dichloroethane	0.0042	0.00012900 g/bhp-hr	EPA
1,3-Dichloropropene	0.0047	0.00014460 g/bhp-hr	EPA
Chlorobenzene	0.0048	0.00014650 g/bhp-hr	EPA
Chloroform	0.0051	0.00015540 g/bhp-hr	EPA
1,1,2-Trichloroethane	0.0057	0.00017390 g/bhp-hr	EPA
1,1,2,2-Tetrachloroethane	0.0072	0.00021880 g/bhp-hr	EPA
Carbon Tetrachloride	0.0066	0.00020030 g/bhp-hr	EPA
Propanal	0.1378	0.00420000 g/bhp-hr	2SLB CLARK
Total	12.5594		

Criteria Pollutants

PM	5.2299	0.15943960 g/bhp-hr	EPA
CO	38.4749	1.17295218 g/bhp-hr	2SLB CLARK
NMHC	70.6058	2.15250000 g/bhp-hr	2SLB CLARK
NMEHC	63.1434	1.92500000 g/bhp-hr	2SLB CLARK
NOx	432.1778	13.17544484 g/bhp-hr	2SLB CLARK
SO2	0.0637	0.00194060 g/bhp-hr	EPA

Other Pollutants

Cyclohexane	0.2117	0.00645500 g/bhp-hr	GRI Field
Butyraldehyde	0.0473	0.00144220 g/bhp-hr	EPA
Methane	108.7419	3.31512507 g/bhp-hr	2SLB CLARK
Acetylene	0.0386	0.00117647 g/bhp-hr	2SLB CLARK
Ethylene	1.4285	0.04355059 g/bhp-hr	2SLB CLARK
Ethane	12.0873	0.36849600 g/bhp-hr	2SLB CLARK
Propylene	0.9531	0.02905639 g/bhp-hr	2SLB CLARK
Propane	4.2689	0.13014361 g/bhp-hr	2SLB CLARK
Isobutane	0.3201	0.00976000 g/bhp-hr	2SLB CLARK
Butane	0.4254	0.01296828 g/bhp-hr	2SLB CLARK
Cyclopentane	0.3490	0.01064000 g/bhp-hr	2SLB CLARK
Butyrald/Isobutyraldehyde	0.1397	0.00426000 g/bhp-hr	2SLB CLARK
Pentane	2.1271	0.06484811 g/bhp-hr	2SLB CLARK
n-Pentane	0.3785	0.01154000 g/bhp-hr	2SLB CLARK
Cyclohexane	0.4053	0.01235636 g/bhp-hr	2SLB CLARK
Methylcyclohexane	0.6738	0.02054200 g/bhp-hr	2SLB CLARK
1,2-Dichloroethane	0.0046	0.00013930 g/bhp-hr	EPA
1,2-Dichloropropane	0.0048	0.00014720 g/bhp-hr	EPA
n-Octane	0.8996	0.02742400 g/bhp-hr	2SLB CLARK
1,2,3-Trimethylbenzene	1.0693	0.03260000 g/bhp-hr	2SLB CLARK
1,2,4-Trimethylbenzene	1.0714	0.03266200 g/bhp-hr	2SLB CLARK
1,3,5-Trimethylbenzene	1.0693	0.03260000 g/bhp-hr	2SLB CLARK
n-Nonane	1.1415	0.03480000 g/bhp-hr	2SLB CLARK
CO2	11,908.2761	363.03769350 g/bhp-hr	EPA

GRI-HAPCalc® 3.01
Engines Report

Facility ID: KM
Operation Type: COMPRESSOR STATION
Facility Name: ROSWELL CS
User Name:
Units of Measure: U.S. STANDARD

Notes:

Note: Emissions less than 5.00E-09 tons (or tonnes) per year are considered insignificant and are treated as zero.
These emissions are indicated on the report with a "0".
Emissions between 5.00E-09 and 5.00E-05 tons (or tonnes) per year are represented on the report with "0.0000".

Engine Unit

Unit Name: AUX-1

Hours of Operation: 500 Yearly
Rate Power: 680 hp
Fuel Type: NATURAL GAS
Engine Type: 4-Stroke, Lean Burn
Emission Factor Set: EPA > FIELD > LITERATURE
Additional EF Set: -NONE-

Calculated Emissions (ton/yr)

<u>Chemical Name</u>	<u>Emissions</u>	<u>Emission Factor</u>	<u>Emission Factor Set</u>
HAPs			
Tetrachloroethane	0.0000	0.00000820 g/bhp-hr	EPA
Formaldehyde	0.0653	0.17425810 g/bhp-hr	EPA
Methanol	0.0031	0.00825090 g/bhp-hr	EPA
Acetaldehyde	0.0103	0.02759090 g/bhp-hr	EPA
1,3-Butadiene	0.0003	0.00088120 g/bhp-hr	EPA
Acrolein	0.0064	0.01696380 g/bhp-hr	EPA
Benzene	0.0005	0.00145220 g/bhp-hr	EPA
Toluene	0.0005	0.00134650 g/bhp-hr	EPA
Ethylbenzene	0.0000	0.00013100 g/bhp-hr	EPA
Xylenes(m,p,o)	0.0002	0.00060730 g/bhp-hr	EPA
2,2,4-Trimethylpentane	0.0003	0.00082510 g/bhp-hr	EPA
n-Hexane	0.0014	0.00366340 g/bhp-hr	EPA
Phenol	0.0000	0.00007920 g/bhp-hr	EPA
Styrene	0.0000	0.00007790 g/bhp-hr	EPA
Naphthalene	0.0001	0.00024550 g/bhp-hr	EPA
2-Methylnaphthalene	0.0000	0.00010960 g/bhp-hr	EPA
Acenaphthylene	0.0000	0.00001830 g/bhp-hr	EPA
Biphenyl	0.0003	0.00069970 g/bhp-hr	EPA
Acenaphthene	0.0000	0.00000410 g/bhp-hr	EPA
Fluorene	0.0000	0.00001870 g/bhp-hr	EPA
Phenanthrene	0.0000	0.00003430 g/bhp-hr	EPA
Ethylene Dibromide	0.0001	0.00014620 g/bhp-hr	EPA
Fluoranthene	0.0000	0.00000370 g/bhp-hr	EPA
Pyrene	0.0000	0.00000450 g/bhp-hr	EPA

Benzo(b)fluoranthene	0.0000	0.00000050 g/bhp-hr	EPA
Benzo(e)pyrene	0.0000	0.00000140 g/bhp-hr	EPA
Benzo(g,h,i)perylene	0.0000	0.00000140 g/bhp-hr	EPA
Vinyl Chloride	0.0000	0.00004920 g/bhp-hr	EPA
Methylene Chloride	0.0000	0.00006600 g/bhp-hr	EPA
1,1-Dichloroethane	0.0000	0.00007790 g/bhp-hr	EPA
1,3-Dichloropropene	0.0000	0.00008710 g/bhp-hr	EPA
Chlorobenzene	0.0000	0.00010030 g/bhp-hr	EPA
Chloroform	0.0000	0.00009410 g/bhp-hr	EPA
1,1,2-Trichloroethane	0.0000	0.00010500 g/bhp-hr	EPA
1,1,2,2-Tetrachloroethane	0.0000	0.00013200 g/bhp-hr	EPA
Carbon Tetrachloride	0.0000	0.00012110 g/bhp-hr	EPA

Total	0.0888		
--------------	--------	--	--

Criteria Pollutants

PM	0.0123	0.03296090 g/bhp-hr	EPA
CO	0.3918	1.04620860 g/bhp-hr	EPA
NMEHC	0.1458	0.38944040 g/bhp-hr	EPA
NOx	5.0421	13.46539810 g/bhp-hr	EPA
SO2	0.0007	0.00194060 g/bhp-hr	EPA

Other Pollutants

Butyraldehyde	0.0001	0.00033330 g/bhp-hr	EPA
Chloroethane	0.0000	0.00000620 g/bhp-hr	EPA
Methane	1.5448	4.12542830 g/bhp-hr	EPA
Ethane	0.1298	0.34653600 g/bhp-hr	EPA
Propane	0.0518	0.13828440 g/bhp-hr	EPA
Butane	0.0007	0.00178550 g/bhp-hr	EPA
Cyclopentane	0.0003	0.00074920 g/bhp-hr	EPA
n-Pentane	0.0032	0.00858090 g/bhp-hr	EPA
Methylcyclohexane	0.0015	0.00405940 g/bhp-hr	EPA
1,2-Dichloroethane	0.0000	0.00007790 g/bhp-hr	EPA
1,2-Dichloropropane	0.0000	0.00008880 g/bhp-hr	EPA
n-Octane	0.0004	0.00115840 g/bhp-hr	EPA
1,2,3-Trimethylbenzene	0.0000	0.00007590 g/bhp-hr	EPA
1,2,4-Trimethylbenzene	0.0000	0.00004720 g/bhp-hr	EPA
1,3,5-Trimethylbenzene	0.0000	0.00011160 g/bhp-hr	EPA
n-Nonane	0.0001	0.00036300 g/bhp-hr	EPA
CO2	135.9392	363.03769350 g/bhp-hr	EPA

TABLE 3.2-1 UNCONTROLLED EMISSION FACTORS FOR 2-STROKE LEAN-BURN ENGINES^a
(SCC 2-02-002-52)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Criteria Pollutants and Greenhouse Gases		
NO _x ^c 90 - 105% Load	3.17 E+00	A
NO _x ^c <90% Load	1.94 E+00	A
CO ^c 90 - 105% Load	3.86 E-01	A
CO ^c <90% Load	3.53 E-01	A
CO ₂ ^d	1.10 E+02	A
SO ₂ ^e	5.88 E-04	A
TOC ^f	1.64 E+00	A
Methane ^g	1.45 E+00	C
VOC ^h	1.20 E-01	C
PM ₁₀ (filterable) ⁱ	3.84 E-02	C
PM _{2.5} (filterable) ⁱ	3.84 E-02	C
PM Condensable ^j	9.91 E-03	E
Trace Organic Compounds		
1,1,2,2-Tetrachloroethane ^k	6.63 E-05	C
1,1,2-Trichloroethane ^k	5.27 E-05	C
1,1-Dichloroethane	3.91 E-05	C
1,2,3-Trimethylbenzene	3.54 E-05	D
1,2,4-Trimethylbenzene	1.11 E-04	C
1,2-Dichloroethane	4.22 E-05	D
1,2-Dichloropropane	4.46 E-05	C
1,3,5-Trimethylbenzene	1.80 E-05	D
1,3-Butadiene ^k	8.20 E-04	D
1,3-Dichloropropene ^k	4.38 E-05	C
2,2,4-Trimethylpentane ^k	8.46 E-04	B
2-Methylnaphthalene ^k	2.14 E-05	C
Acenaphthene ^k	1.33 E-06	C

Table 3.2-1. UNCONTROLLED EMISSION FACTORS FOR 2-STROKE LEAN-BURN ENGINES

(Continued)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Acenaphthylene ^k	3.17 E-06	C
Acetaldehyde ^{k,l}	7.76 E-03	A
Acrolein ^{k,l}	7.78 E-03	A
Anthracene ^k	7.18 E-07	C
Benz(a)anthracene ^k	3.36 E-07	C
Benzene ^k	1.94 E-03	A
Benzo(a)pyrene ^k	5.68 E-09	D
Benzo(b)fluoranthene ^k	8.51 E-09	D
Benzo(e)pyrene ^k	2.34 E-08	D
Benzo(g,h,i)perylene ^k	2.48 E-08	D
Benzo(k)fluoranthene ^k	4.26 E-09	D
Biphenyl ^k	3.95 E-06	C
Butane	4.75 E-03	C
Butyr/Isobutyraldehyde	4.37 E-04	C
Carbon Tetrachloride ^k	6.07 E-05	C
Chlorobenzene ^k	4.44 E-05	C
Chloroform ^k	4.71 E-05	C
Chrysene ^k	6.72 E-07	C
Cyclohexane	3.08 E-04	C
Cyclopentane	9.47 E-05	C
Ethane	7.09 E-02	A
Ethylbenzene ^k	1.08 E-04	B
Ethylene Dibromide ^k	7.34 E-05	C
Fluoranthene ^k	3.61 E-07	C
Fluorene ^k	1.69 E-06	C
Formaldehyde ^{k,l}	5.52 E-02	A

Table 3.2-1. UNCONTROLLED EMISSION FACTORS FOR 2-STROKE LEAN-BURN ENGINES
(Concluded)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Indeno(1,2,3-c,d)pyrene ^k	9.93 E-09	D
Isobutane	3.75 E-03	C
Methanol ^k	2.48 E-03	A
Methylcyclohexane	3.38 E-04	C
Methylene Chloride ^k	1.47 E-04	C
n-Hexane ^k	4.45 E-04	C
n-Nonane	3.08 E-05	C
n-Octane	7.44 E-05	C
n-Pentane	1.53 E-03	C
Naphthalene ^k	9.63 E-05	C
PAH ^k	1.34 E-04	D
Perylene ^k	4.97 E-09	D
Phenanthrene ^k	3.53 E-06	C
Phenol ^k	4.21 E-05	C
Propane	2.87 E-02	C
Pyrene ^k	5.84 E-07	C
Styrene ^k	5.48 E-05	A
Toluene ^k	9.63 E-04	A
Vinyl Chloride ^k	2.47 E-05	C
Xylene ^k	2.68 E-04	A

^a Reference 7. Factors represent uncontrolled levels. For NO_x, CO, and PM₁₀, “uncontrolled” means no combustion or add-on controls; however, the factor may include turbocharged units. For all other pollutants, “uncontrolled” means no oxidation control; the data set may include units with control techniques used for NO_x control, such as PCC and SCR for lean burn engines, and PSC for rich burn engines. Factors are based on large population of engines. Factors are for engines at all loads, except as indicated. SCC = Source Classification Code. TOC = Total Organic Compounds. PM₁₀ = Particulate Matter ≤ 10 microns (μm) aerodynamic diameter. A “<” sign in front of a factor means that the corresponding emission factor is based on one-half of the method detection limit.

^b Emission factors were calculated in units of (lb/MMBtu) based on procedures in EPA

Method 19. To convert from (lb/MMBtu) to (lb/10⁶ scf), multiply by the heat content of the fuel. If the heat content is not available, use 1020 Btu/scf. To convert from (lb/MMBtu) to (lb/hp-hr) use the following equation:

$$\text{lb/hp-hr} = (\text{lb/MMBtu}) (\text{heat input, MMBtu/hr}) (1/\text{operating HP, 1/hp})$$

^c Emission tests with unreported load conditions were not included in the data set.

^d Based on 99.5% conversion of the fuel carbon to CO₂. CO₂ [lb/MMBtu] = (3.67)(%CON)(C)(D)(1/h), where %CON = percent conversion of fuel carbon to CO₂, C = carbon content of fuel by weight (0.75), D = density of fuel, 4.1 E+04 lb/10⁶ scf, and h = heating value of natural gas (assume 1020 Btu/scf at 60°F).

^e Based on 100% conversion of fuel sulfur to SO₂. Assumes sulfur content in natural gas of 2,000 gr/10⁶ scf.

^f Emission factor for TOC is based on measured emission levels of 43 tests.

^g Emission factor for methane is determined by subtracting the VOC and ethane emission factors from the TOC emission factor. Measured emission factor for methane compares well with the calculated emission factor, 1.48 lb/MMBtu vs. 1.45 lb/MMBtu, respectively.

^h VOC emission factor is based on the sum of the emission factors for all speciated organic compounds less ethane and methane.

ⁱ Considered ≤ 1 μm in aerodynamic diameter. Therefore, for filterable PM emissions, PM10(filterable) = PM2.5(filterable).

^j No data were available for condensable PM emissions. The presented emission factor reflects emissions from 4SLB engines.

^k Hazardous Air Pollutant as defined by Section 112(b) of the Clean Air Act.

^l For lean burn engines, aldehyde emissions quantification using CARB 430 may reflect interference with the sampling compounds due to the nitrogen concentration in the stack. The presented emission factor is based on FTIR measurements. Emissions data based on CARB 430 are available in the background report.

Table 3.2-2. UNCONTROLLED EMISSION FACTORS FOR 4-STROKE LEAN-BURN ENGINES^a
(SCC 2-02-002-54)

Pollutant	Emission Factor (lb/MMBtu) ^b (fuel input)	Emission Factor Rating
Criteria Pollutants and Greenhouse Gases		
NO _x ^c 90 - 105% Load	4.08 E+00	B
NO _x ^c <90% Load	8.47 E-01	B
CO ^c 90 - 105% Load	3.17 E-01	C
CO ^c <90% Load	5.57 E-01	B
CO ₂ ^d	1.10 E+02	A
SO ₂ ^e	5.88 E-04	A
TOC ^f	1.47 E+00	A
Methane ^g	1.25 E+00	C
VOC ^h	1.18 E-01	C
PM10 (filterable) ⁱ	7.71 E-05	D
PM2.5 (filterable) ⁱ	7.71 E-05	D
PM Condensable ^j	9.91 E-03	D
Trace Organic Compounds		
1,1,2,2-Tetrachloroethane ^k	<4.00 E-05	E
1,1,2-Trichloroethane ^k	<3.18 E-05	E
1,1-Dichloroethane	<2.36 E-05	E
1,2,3-Trimethylbenzene	2.30 E-05	D
1,2,4-Trimethylbenzene	1.43 E-05	C
1,2-Dichloroethane	<2.36 E-05	E
1,2-Dichloropropane	<2.69 E-05	E
1,3,5-Trimethylbenzene	3.38 E-05	D
1,3-Butadiene ^k	2.67E-04	D
1,3-Dichloropropene ^k	<2.64 E-05	E
2-Methylnaphthalene ^k	3.32 E-05	C
2,2,4-Trimethylpentane ^k	2.50 E-04	C
Acenaphthene ^k	1.25 E-06	C

GRI-HAPCalc® 3.01
Fugitive Emissions Report

Facility ID:	KM ROSWELL	Notes:
Operation Type:	COMPRESSOR STATION	
Facility Name:	ROSWELL COMPRESSOR STATION	
User Name:		
Units of Measure:	U.S. STANDARD	

Note: Emissions less than 5.00E-09 tons (or tonnes) per year are considered insignificant and are treated as zero.
These emissions are indicated on the report with a "0".
Emissions between 5.00E-09 and 5.00E-05 tons (or tonnes) per year are represented on the report with "0.0000".

Fugitive Emissions

Calculation Method: EPA Average Factors

User Inputs

<u>Component</u>	<u>Gas Service</u>	<u>Light Liquid Service</u>	<u>Heavy Liquid Service</u>
Connections:	737	0	0
Flanges	120	0	0
Open-Ended Lines:	14	0	0
Pumps:	0	0	0
Valves:	257	0	0
Others:	30	0	0

Calculated Emissions (ton/yr)

<u>Chemical Name</u>	<u>Emissions</u>
<u>HAPs</u>	
Benzene	0.0037
Toluene	0.0062
Ethylbenzene	0.0003
Xylenes(m,p,o)	0.0016
Total	0.0118

Criteria Pollutants

NMHC	1.2712
NMEHC	0.5561

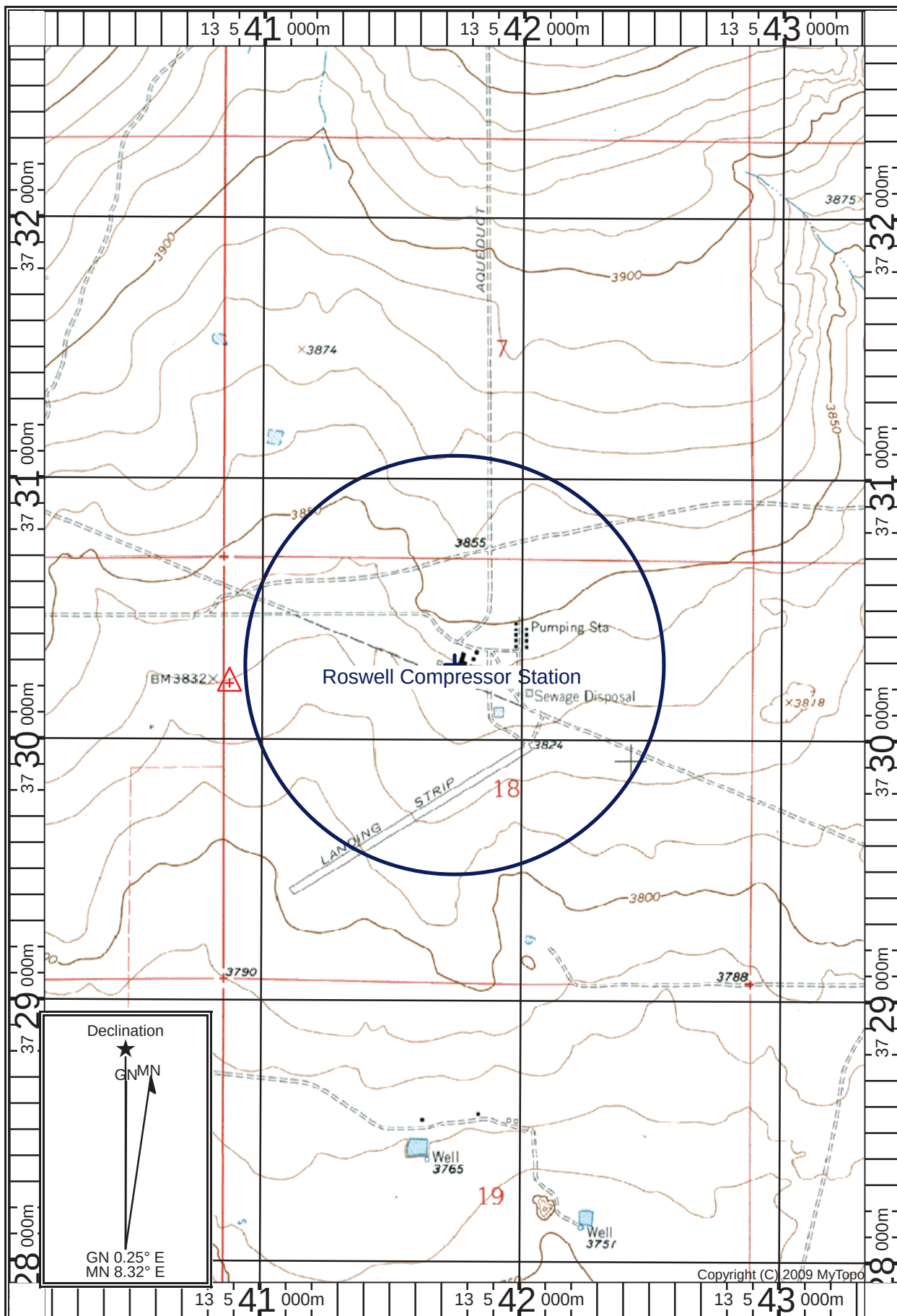
Section 8

Map(s)

A map such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

The UTM or Longitudinal coordinate system on both axes	An indicator showing which direction is north
A minimum radius around the plant of 0.8km (0.5 miles)	Access and haul roads
Topographic features of the area	Facility property boundaries
The name of the map	The area which will be restricted to public access
A graphical scale	

A map showing the location of Roswell Compressor Station is attached.



Section 9

Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)

(This proof is required by: 20.2.72.203.A.14 NMAC "Documentary Proof of applicant's public notice")

☐ **I have read the AQB "Guidelines for Public Notification for Air Quality Permit Applications"**

This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

Unless otherwise allowed elsewhere in this document, the following items document proof of the applicant's Public Notification. Please include this page in your proof of public notice submittal with checkmarks indicating which documents are being submitted with the application.

New Permit and **Significant Permit Revision** public notices must include all items in this list.

Technical Revision public notices require only items 1, 5, 9, and 10.

Per the Guidelines for Public Notification document mentioned above, include:

1. ☐ A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
 2. ☐ A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
 3. ☐ A copy of the property tax record (20.2.72.203.B NMAC).
 4. ☐ A sample of the letters sent to the owners of record.
 5. ☐ A sample of the letters sent to counties, municipalities, and Indian tribes.
 6. ☐ A sample of the public notice posted and a verification of the local postings.
 7. ☐ A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
 8. ☐ A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
 9. ☐ A copy of the classified or legal ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
 10. ☐ A copy of the display ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
 11. ☐ A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.
-

Public Notice is not required for a Title V Renewal Application.

Section 10

Written Description of the Routine Operations of the Facility

A written description of the routine operations of the facility. Include a description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated. For modifications and/or revisions, explain how the changes will affect the existing process. In a separate paragraph describe the major process bottlenecks that limit production. The purpose of this description is to provide sufficient information about plant operations for the permit writer to determine appropriate emission sources.

Roswell Compressor Station is owned and operated by El Paso Natural Gas Company, LLC (EPNG), a Kinder Morgan company. The facility consists of three (3) 2-stroke Lean Burn compressor engines (Units A-01, A-02, and A-03), startup, shut down, and maintenance (SSM) emissions, and insignificant emissions from activities including storage tanks and fugitive emissions. The compressors compress sweet natural gas for transport through natural gas transmission pipelines.

Section 11

Source Determination

Source submitting under 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC

Sources applying for a construction permit, PSD permit, or operating permit shall evaluate surrounding and/or associated sources (including those sources directly connected to this source for business reasons) and complete this section. Responses to the following questions shall be consistent with the Air Quality Bureau's permitting guidance, Single Source Determination Guidance, which may be found on the Applications Page in the Permitting Section of the Air Quality Bureau website.

Typically, buildings, structures, installations, or facilities that have the same SIC code, that are under common ownership or control, and that are contiguous or adjacent constitute a single stationary source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. Submission of your analysis of these factors in support of the responses below is optional, unless requested by NMED.

A. Identify the emission sources evaluated in this section (list and describe): Refer to Table 2-A.

B. Apply the 3 criteria for determining a single source:

SIC Code: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, OR surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.

☒ **Yes** ☐ **No**

Common Ownership or Control: Surrounding or associated sources are under common ownership or control as this source.

☒ **Yes** ☐ **No**

Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source.

☒ **Yes** ☐ **No**

C. Make a determination:

- ☒ The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all **"YES"** boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes **"NO"** to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.
- ☐ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

Section 12

Section 12.A

PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

A PSD applicability determination for all sources. For sources applying for a significant permit revision, apply the applicable requirements of 20.2.74.AG and 20.2.74.200 NMAC and to determine whether this facility is a major or minor PSD source, and whether this modification is a major or a minor PSD modification. It may be helpful to refer to the procedures for Determining the Net Emissions Change at a Source as specified by Table A-5 (Page A.45) of the EPA New Source Review Workshop Manual to determine if the revision is subject to PSD review.

A. This facility is:

- ☐ a minor PSD source before and after this modification (if so, delete C and D below).
- ☐ a major PSD source before this modification. This modification will make this a PSD minor source.
- ☐ an existing PSD Major Source that has never had a major modification requiring a BACT analysis.
- ☐ an existing PSD Major Source that has had a major modification requiring a BACT analysis
- ☐ a new PSD Major Source after this modification.

B. This facility [is or is not] one of the listed 20.2.74.501 Table I – PSD Source Categories. The “project” emissions for this modification are [significant or not significant]. [Discuss why.] The “project” emissions listed below [do or do not] only result from changes described in this permit application, thus no emissions from other [revisions or modifications, past or future] to this facility. Also, specifically discuss whether this project results in “de-bottlenecking”, or other associated emissions resulting in higher emissions. The project emissions (before netting) for this project are as follows [see Table 2 in 20.2.74.502 NMAC for a complete list of significance levels]:

- a. NOx: XX.X TPY
- b. CO: XX.X TPY
- c. VOC: XX.X TPY
- d. SOx: XX.X TPY
- e. PM: XX.X TPY
- f. PM10: XX.X TPY
- g. PM2.5: XX.X TPY
- h. Fluorides: XX.X TPY
- i. Lead: XX.X TPY
- j. Sulfur compounds (listed in Table 2): XX.X TPY
- k. GHG: XX.X TPY

- C. Netting [is required, and analysis is attached to this document.] OR [is not required (project is not significant)] OR [Applicant is submitting a PSD Major Modification and chooses not to net.]
 - D. BACT is [not required for this modification, as this application is a minor modification.] OR [required, as this application is a major modification. List pollutants subject to BACT review and provide a full top down BACT determination.]
 - E. If this is an existing PSD major source, or any facility with emissions greater than 250 TPY (or 100 TPY for 20.2.74.501 Table 1 – PSD Source Categories), determine whether any permit modifications are related, or could be considered a single project with this action, and provide an explanation for your determination whether a PSD modification is triggered.
-

N/A- This application is for a Title V Renewal under 20.2.70; therefore, a PSD applicability determination is not required.

Section 13

Determination of State & Federal Air Quality Regulations

This section lists each state and federal air quality regulation that may apply to your facility and/or equipment that are stationary sources of regulated air pollutants.

Not all state and federal air quality regulations are included in this list. Go to the Code of Federal Regulations (CFR) or to the Air Quality Bureau's regulation page to see the full set of air quality regulations.

Required Information for Specific Equipment:

For regulations that apply to specific source types, in the 'Justification' column **provide any information needed to determine if the regulation does or does not apply. For example**, to determine if emissions standards at 40 CFR 60, Subpart IIII apply to your three identical stationary engines, we need to know the construction date as defined in that regulation; the manufacturer date; the date of reconstruction or modification, if any; if they are or are not fire pump engines; if they are or are not emergency engines as defined in that regulation; their site ratings; and the cylinder displacement.

Required Information for Regulations that Apply to the Entire Facility:

See instructions in the 'Justification' column for the information that is needed to determine if an 'Entire Facility' type of regulation applies (e.g. 20.2.70 or 20.2.73 NMAC).

Regulatory Citations for Regulations That Do Not, but Could Apply:

If there is a state or federal air quality regulation that does not apply, but you have a piece of equipment in a source category for which a regulation has been promulgated, you must **provide the low level regulatory citation showing why your piece of equipment is not subject to or exempt from the regulation. For example** if you have a stationary internal combustion engine that is not subject to 40 CFR 63, Subpart ZZZZ because it is an existing 2 stroke lean burn stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, your citation would be 40 CFR 63.6590(b)(3)(i). **We don't want a discussion of every non-applicable regulation, but if it is possible a regulation could apply, explain why it does not. For example**, if your facility is a power plant, you do not need to include a citation to show that 40 CFR 60, Subpart OOO does not apply to your non-existent rock crusher.

Regulatory Citations for Emission Standards:

For each unit that is subject to an emission standard in a source specific regulation, such as 40 CFR 60, Subpart OOO or 40 CFR 63, Subpart HH, include the low level regulatory citation of that emission standard. Emission standards can be numerical emission limits, work practice standards, or other requirements such as maintenance. **Here are examples:** a glycol dehydrator is subject to the general standards at 63.764C(1)(i) through (iii); an engine is subject to 63.6601, Tables 2a and 2b; a crusher is subject to 60.672(b), Table 3 and all transfer points are subject to 60.672(e)(1)

Federally Enforceable Conditions:

All federal regulations are federally enforceable. All Air Quality Bureau State regulations are federally enforceable except for the following: affirmative defense portions at 20.2.7.6.B, 20.2.7.110(B)(15), 20.2.7.11 through 20.2.7.113, 20.2.7.115, and 20.2.7.116; 20.2.37; 20.2.42; 20.2.43; 20.2.62; 20.2.63; 20.2.86; 20.2.89; and 20.2.90 NMAC. Federally enforceable means that EPA can enforce the regulation as well as the Air Quality Bureau and federally enforceable regulations can count toward determining a facility's potential to emit (PTE) for the Title V, PSD, and nonattainment permit regulations.

INCLUDE ANY OTHER INFORMATION NEEDED TO COMPLETE AN APPLICABILITY DETERMINATION OR THAT IS RELEVANT TO YOUR FACILITY'S NOTICE OF INTENT OR PERMIT.

EPA Applicability Determination Index for 40 CFR 60, 61, 63, etc: <http://cfpub.epa.gov/adi/>

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this attachment on this page.

Table for State Regulations:

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)	
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.	
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	20.2.3 NMAC is a State Implementation Plan (SIP) approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.	
20.2.7 NMAC	Excess Emissions	Yes	Facility	All Title V major sources are subject to Air Quality Control Regulations, as defined in 20.2.7 NMAC, and are thus subject to the requirements of this regulation.	
20.2.23 NMAC	Fugitive Dust Control	No	Facility	Roswell Compressor Station is not located in an area or county subject to a mitigation plan per 40 CFR 51.930. The haul road emissions of this facility are exempt.	
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	This facility does not have existing gas burning equipment with a heat input rate greater than 1,000,000 MMBtu/yr.	
20.2.34 NMAC	Oil Burning Equipment: NO ₂	No	N/A	This facility does not have oil burning equipment with a heat input rate greater than 1,000,000 MMBtu/yr.	
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This facility is not a natural gas process plant, as defined in this regulation.	
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	N/A	N/A	These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.	
20.2.38 NMAC	Hydrocarbon Storage Facility	No	N/A	This facility does not have any tanks that receive or store crude oil or condensate.	
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This facility is not a sulfur recovery plant, as defined in this regulation.	
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants	Yes	A-01, A-02, A-03, AUX-A1	This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NOx) for oil and gas production, processing, compression, and transmission sources. 20.2.50 NMAC subparts below: Include the construction status of applicable units as “New”, “Existing”, “Relocation of Existing”, or “Reconstructed” as defined by this Part in your justification: Check the box for the subparts that are applicable: ☒ 113 – Engines and Turbines ☐ 114 – Compressor Seals ☐ 115 – Control Devices and Closed Vent Systems ☒ 116 – Equipment Leaks and Fugitive Emissions	113- Units A-01, A-02, A-03, AUX-A1 are existing units and EPNG will comply with all applicable requirements of this rule and have submitted an ACP. EPNG will comply with the requirements of this subpart. 114—N/A—Reciprocating compressors located at transmission compressor stations are not subject to the requirements of 20.2.50.114 NMAC. 115—N/A—There are no Flares, ECDs, Thermal Oxidizers, or Vapor Recovery Units at this facility.

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)	
				☐ 117 – Natural Gas Well Liquid Unloading ☐ 118 – Glycol Dehydrators ☐ 119 – Heaters ☐ 120 – Hydrocarbon Liquid Transfers ☐ 121 – Pig Launching and Receiving ☒ 122 – Pneumatic Controllers and Pumps ☐ 123 – Storage Vessels ☐ 124 – Well Workovers ☐ 125 – Small Business Facilities ☐ 126 – Produced Water Management Unit ☐ 127 – Flowback Vessels and Preproduction Operations	116- EPNG will comply with the requirements of this subpart. 117—N/A—There are no natural gas wells with liquid unloading operations at this facility; therefore, this subpart does not apply. 118—N/A—there are no glycol dehydrator operations at this facility; therefore, this subpart does not apply. 119—N/A—There are no heaters located at this facility; therefore, this subpart does not apply. 120—N/A—there are no hydrocarbon liquid transfers located at this facility; therefore, this subpart does not apply. 121—N/A—there are no pipeline pig launching or receiving operations at this facility; therefore, this subpart does not apply. 122- EPNG will comply with the requirements of this subpart. 123—N/A—There are no permitted hydrocarbon storage vessels at this facility; therefore, this subpart does not apply. 124—N/A—There are no oil or natural gas wells located at this facility; therefore, this subpart does not apply. 125—N/A—This facility does not qualify as a small business facility; therefore, this subpart does not apply. 126—N/A—There are no produced water

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)	
					management units at this facility; therefore, this subpart does not apply. 127—N/A—There are no wells located at this facility; therefore, this subpart does not apply.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	A-01, A-02, A-03, AUX-A1	The facility's units A-01, A-02, A-03, and AUX-A1 are stationary combustion equipment and comply with this regulation by using only pipeline quality natural gas.	
20.2.70 NMAC	Operating Permits	Yes	Facility	This facility is a Title V major source.	
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This Facility is subject to 20.2.70 NMAC and therefore is subject to this regulation.	
20.2.72 NMAC	Construction Permits	Yes	Facility	This facility is subject 20.2.72 NMAC and is authorized by the NSR Permit number 3371-M1.	
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	This facility is a Title V major source and must submit an annual emissions inventory (EI). EPNG inventory information and other facility data gathered by the company's COMET database, is based on the North American Energy Standards Board (NAESB) Day, as opposed to the facility's calendar day.	
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	Facility	This facility is not a PSD major source, as it does not have the potential to emit over 250 tons per year of any regulated pollutant.	
20.2.75 NMAC	Construction Permit Fees	No	Facility	This facility is a Title V major source and is subject to 20.2.71 NMAC. The facility is exempt from annual fees under this part per 20.2.75.11.E NMAC.	
20.2.77 NMAC	New Source Performance	No	Units subject to 40 CFR 60	This facility does not have any sources that are subject to the requirements of 40 CFR 60, as amended through December 31, 2010.	
20.2.78 NMAC	Emission Standards for HAPS	No	Units Subject to 40 CFR 61	This facility does not typically emit hazardous air pollutants which are subject to the requirements of 40 CFR 61, as amended through December 31, 2010	
20.2.79 NMAC	Permits – Nonattainment Areas	No	Facility	This Facility is not located in a nonattainment area.	
20.2.80 NMAC	Stack Heights	No		This facility does not have any stacks that exceed Good Engineering Practices (GEP).	
20.2.82 NMAC	MACT Standards for source categories of HAPS	Yes	A-01, A-02, A-03	Units A-01, A-02, and A-03 are subject to 40 CFR 63, Subpart ZZZZ as amended through December 31, 2010, and therefore are subject to 20.2.82 NMAC	

Table for Applicable Federal Regulations (Note: This is not an exhaustive list):

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 50	NAAQS	Yes	Facility	National ambient air quality standards (NAAQS) are established as an applicable requirement at 20.2.79.7.E.11.
NSPS 40 CFR 60, Subpart A	General Provisions	No	Units subject to 40 CFR 60	This facility does not have any unit subject to any subparts of 40 CFR 60 and therefore is not subject to Subpart A.
NSPS 40 CFR 60.40a, Subpart Da	Subpart Da, Performance Standards for Electric Utility Steam Generating Units	No	N/A	This facility does not have any electric utility steam generating units.
NSPS 40 CFR 60.40b Subpart Db	Electric Utility Steam Generating Units	No	N/A	This facility does not have any electric utility steam generating units.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	This facility does not contain small industrial, commercial, or institutional Steam generating Units.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	No	N/A	This facility does not have any tanks subject to this regulation.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	No	N/A	This facility does not contain any tanks subject to this regulation.
NSPS 40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No	N/A	This facility does not have any stationary gas turbines.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from Onshore Gas Plants	No	N/A	This facility is not an onshore natural gas processing plant.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions	No	N/A	This facility is not an onshore natural gas processing plant.
NSPS 40 CFR Part 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	No	N/A	All equipment at the facility was installed prior to August 23, 2011. No units are subject to this regulation.
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	No	N/A	The facility was constructed prior to the applicability date of the regulation. No units are subject to this regulation.
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion Engines	No	N/A	This facility does not contain stationary compression Ignition Internal Combustion Engines.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	No	N/A	Units A-01, A-02, and A-03 were retrofitted on November 14, 2007. This retrofit resulted in a net decrease in all emission rates and therefore does not constitute a modification. The retrofit also did not exceed 50% of the fixed capital cost and accordingly, is not considered a reconstruction. Since these engines have not been modified or reconstrued since the applicability dates in the regulation, the units are not subject to the requirements of this rule.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	This facility does not contain stationary compression Ignition Internal Combustion Engines.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times	No	N/A	This facility does not contain any electric generating units therefore this regulation does not apply.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	for Electric Utility Generating Units			
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	This regulation does not apply because this facility is not a Landfill.
NESHAP 40 CFR 61 Subpart A	General Provisions	No	N/A	This part applies to the owner or operator of any stationary sources for which a standard is prescribed under this part. Although the standard does not apply to Roswell Compressor Station under routine operating conditions, in the case of asbestos demolition Subpart M would apply.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for Mercury	No	N/A	The provisions of this subpart are applicable to those stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge. This NESHAP does not apply to a natural gas transmission facility.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	No	N/A	This facility does not operate in VHAP service, which is defined as a piece of equipment either containing or contacting a fluid (liquid or gas) at least 10 percent by weight of VHAP.
MACT 40 CFR 63, Subpart A	General Provisions	Yes	A-01, A-02, A-03, AUX-A1	Applies because MACT ZZZZ applies to units A-01 A-02, A-03, and AUX-A1.
MACT 40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	No	N/A	Roswell Compressor Station is not an oil/gas production facility. Additionally, the facility does not have any sources subject to this regulation (glycol, dehydrator; storage vessel with the potential for flash; ancillary equipment operating in VHAP service; or compressors in VHAP service) and therefore is not subject to the requirements of this regulation.
MACT 40 CFR 63 Subpart HHH	Natural Gas Transmission and Storage Facilities	No	N/A	Roswell Compressor Station is a natural gas transmission facility. However, the facility does not contain any affected sources under this subpart [63.1270(c)] and therefore is not subject to the requirements of this regulation.
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	No	N/A	This facility does not contain industrial, commercial, and institutional boilers and process heaters.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric	No	N/A	This facility does not contain any Coal & Oil Fire Electric Utility Steam Generating Units, therefore this regulation does not apply.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	Utility Steam Generating Unit			
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	A-01, A-02, A-03, AUX-A1	A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30 and is not used to propel a motor vehicle or a vehicle used solely for competition. A major sources of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major sources of HAP emissions is determined for each surface site. The emergency stationary RICE listed in paragraphs (f)(1) through (3) of this section are not subject to this subpart. The stationary RICE must meet the definition of an emergency stationary RICE in §63.6675, which includes operating according to the provisions specified in §63.6640(f). This regulation defines national emissions standards for HAPs for stationary reciprocating Internal Combustion Engines. Units A-01, A-02, A-03, and AUX-A1 are subject to 40 CFR 63, Subpart ZZZZ and the facility will comply with all applicable requirements.
40 CFR 64	Compliance Assurance Monitoring	No	N/A	Though the facility is a major source with a unit subject to an emission limitation or standard, no control devices are used to achieve compliance. Therefore, the facility is not subject to this regulation.
40 CFR 68	Chemical Accident Prevention	No	N/A	This facility is regulated under DOT Office of Pipeline Safety Regulations (40 CFR 192, 193, and 195); therefore, it is not subject to this regulation. This Regulation arises from section 112(r) of the Clean Air Act and establishes thresholds based on inventoried quantities of specific substances in the process. As established at 40 CFR 68.3, the term “stationary sources” does not apply to the transportation of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR parts 192, 193, or 195 (DOT Office of Pipeline Safety Regulations).
Title IV – Acid Rain 40 CFR 72	Acid Rain	No	N/A	This facility is not an acid rain source.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions	No	N/A	This facility is not an acid rain source.
Title IV-Acid Rain 40 CFR 75	Continuous Emissions Monitoring	No	N/A	This facility does not generate commercial electric power or electric power for sale therefore this regulation does not apply.
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program	No	N/A	This facility is not an acid rain source.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	Yes	N/A	EPNG owns appliances containing CFCs and is therefore subject to this requirement. However, this requirement imposes no obligation on the facility beyond those imposed on any individual or corporate owner of such appliances, and is mentioned here only in the interest of be thorough. EPNG uses only certified technicians for the maintenance, service, repair, and disposal of appliances and maintains the appropriate records for this requirement.

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

- ☒ **Title V Sources** (20.2.70 NMAC): By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☐ **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☒ **Title V** (20.2.70 NMAC), **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.
-

EPNG maintains the required planning and excess emission mitigation documents at Roswell Compressor Station.

Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

Alternative Operating Scenarios: Provide all information required by the department to define alternative operating scenarios. This includes process, material and product changes; facility emissions information; air pollution control equipment requirements; any applicable requirements; monitoring, recordkeeping, and reporting requirements; and compliance certification requirements. Please ensure applicable Tables in this application are clearly marked to show alternative operating scenario.

Construction Scenarios: When a permit is modified authorizing new construction to an existing facility, NMED includes a condition to clearly address which permit condition(s) (from the previous permit and the new permit) govern during the interval between the date of issuance of the modification permit and the completion of construction of the modification(s). There are many possible variables that need to be addressed such as: Is simultaneous operation of the old and new units permitted and, if so for example, for how long and under what restraints? In general, these types of requirements will be addressed in Section A100 of the permit, but additional requirements may be added elsewhere. Look in A100 of our NSR and/or TV permit template for sample language dealing with these requirements. Find these permit templates at: www.env.nm.gov/air-quality/permitting-section-procedures-and-guidance/. Compliance with standards must be maintained during construction, which should not usually be a problem unless simultaneous operation of old and new equipment is requested.

In this section, under the bolded title “Construction Scenarios”, specify any information necessary to write these conditions, such as: conservative-realistic estimated time for completion of construction of the various units, whether simultaneous operation of old and new units is being requested (and, if so, modeled), whether the old units will be removed or decommissioned, any PSD ramifications, any temporary limits requested during phased construction, whether any increase in emissions is being requested as SSM emissions or will instead be handled as a separate Construction Scenario (with corresponding emission limits and conditions, etc.

EPNG understands “alternative operating scenarios” to apply to one or more sources that may routinely operate with alternative fuels or raw materials and/or on a significantly different schedule that may potentially affect emissions. Based on this understanding, Roswell Compressor Station does not have any alternative operating scenarios.

Units at this facility may be shut down periodically due to numerous factors, including but not limited to, market demand, maintenance, repair, malfunctions, and emergency situations. Operating in alternative modes and temporary shutdowns are not alternative operating scenarios as EPNG understands the term.

Section 16

Air Dispersion Modeling

- 1) Minor Source Construction (20.2.72 NMAC) and Prevention of Significant Deterioration (PSD) (20.2.74 NMAC) ambient impact analysis (modeling): Provide an ambient impact analysis as required at 20.2.72.203.A(4) and/or 20.2.74.303 NMAC and as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines found on the Planning Section's modeling website. If air dispersion modeling has been waived for one or more pollutants, attach the AQB Modeling Section modeling waiver approval documentation.
- 2) SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions during routine or predictable startup, shutdown, or maintenance (SSM) using realistic worst case scenarios following guidance from the Air Quality Bureau's dispersion modeling section. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions modeling requirements.
- 3) Title V (20.2.70 NMAC) ambient impact analysis: Title V applications must specify the construction permit and/or Title V Permit number(s) for which air quality dispersion modeling was last approved. Facilities that have only a Title V permit, such as landfills and air curtain incinerators, are subject to the same modeling required for preconstruction permits required by 20.2.72 and 20.2.74 NMAC.

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). See #1 above. Note: Neither modeling nor a modeling waiver is required for VOC emissions.	
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above.	X
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	

Check each box that applies:

- ☐ See attached, approved modeling **waiver for all** pollutants from the facility.
- ☐ See attached, approved modeling **waiver for some** pollutants from the facility.
- ☐ Attached in Universal Application Form 4 (UA4) is a **modeling report for all** pollutants from the facility.
- ☐ Attached in UA4 is a **modeling report for some** pollutants from the facility.
- ☒ No modeling is required.

Dispersion modeling is not required as part of this Title V operating permit renewal application. A modeled demonstration of compliance with National Ambient Air Quality Standards (NAAQS) and New Mexico Ambient Air Quality Standards (NMAAQS) was submitted with the application for NSR Permit 3375 (filed in April 2006), and the permit was issued based on that demonstration. NSR Permit 3375-M1 was a significant revision to incorporate VOC SSM emission and modeling was not required. No changes have been made affecting regulated equipment or emissions at the facility since these previous permit applications.

Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

To show compliance with existing NSR permits conditions, you must submit a compliance test history. The table below provides an example.

Compliance Test History Table

Unit No.	Test Description	Test Date
A-01	Periodic Emissions Testing for NOx and CO.	12/07/2023
A-02	Periodic Emissions Testing for NOx and CO.	11/13/2023
A-03	Periodic Emissions Testing for NOx and CO.	11/15/2023
A-01	Periodic Emissions Testing for NOx and CO.	09/13/2022
A-02	Periodic Emissions Testing for NOx and CO.	09/14/2022
A-03	Periodic Emissions Testing for NOx and CO.	09/13/2022
A-01	Periodic Emissions Testing for NOx and CO.	10/12/2021
A-02	Periodic Emissions Testing for NOx and CO.	10/12/2021
A-03	Periodic Emissions Testing for NOx and CO.	10/11/2021
A-01	Periodic Emissions Testing for NOx and CO.	10/20/2020
A-02	Periodic Emissions Testing for NOx and CO.	10/21/2020
A-03	Periodic Emissions Testing for NOx and CO.	10/21/2020
A-01	Portable analyzer for NO _x and CO.	11/12/2019
A-02	Portable analyzer for NO _x and CO.	07/24/2019
A-03	Portable analyzer for NO _x and CO.	07/24/2019
A-02	Tested in accordance with EPA test methods for NOx and CO.	02/25/2015
A-03	Tested in accordance with EPA test methods for NOx and CO.	02/24/2015
A-01	Portable analyzer for NO _x and CO.	11/13/2007
A-02	Portable analyzer for NO _x and CO.	11/28/2007
A-03	Portable analyzer for NO _x and CO.	11/13/2007
A-01	Tested in accordance with EPA test methods for NOx and CO.	03/13/2007
A-02	Tested in accordance with EPA test methods for NOx and CO.	03/14/2007
A-03	Tested in accordance with EPA test methods for NOx and CO.	05/01/2007

Section 19

Requirements for Title V Program

Do not print this section unless this is a Title V application.

Who Must Use this Attachment:

- * Any major source as defined in 20.2.70 NMAC.
- * Any source, including an area source, subject to a standard or other requirement promulgated under Section 111 - Standards of Performance for New Stationary Sources, or Section 112 Hazardous Air Pollutants, of the 1990 federal Clean Air Act ("federal Act"). Non-major sources subject to Sections 111 or 112 of the federal Act are exempt from the obligation to obtain a 20.2.70 NMAC operating permit until such time that the EPA Administrator completes rulemakings that require such sources to obtain operating permits. In addition, sources that would be required to obtain an operating permit solely because they are subject to regulations or requirements under Section 112(r) of the federal Act are exempt from the requirement to obtain an Operating Permit.
- * Any Acid Rain source as defined under title IV of the federal Act. The Acid Rain program has additional forms. See www.env.nm.gov/air-quality/air-quality-title-v-operating-permits-guidance-page/. Sources that are subject to both the Title V and Acid Rain regulations are encouraged to submit both applications simultaneously.
- * Any source in a source category designated by the EPA Administrator ("Administrator"), in whole or in part, by regulation, after notice and comment.

Roswell Compressor Station is a Title V major source as defined in 20.2.70 NMAC.

19.1 - 40 CFR 64, Compliance Assurance Monitoring (CAM) (20.2.70.300.D.10.e NMAC)

Any source subject to 40CFR, Part 64 (Compliance Assurance Monitoring) must submit all the information required by section 64.7 with the operating permit application. The applicant must prepare a separate section of the application package for this purpose; if the information is already listed elsewhere in the application package, make reference to that location. Facilities not subject to Part 64 are invited to submit periodic monitoring protocols with the application to help the AQB to comply with 20.2.70 NMAC. Sources subject to 40 CFR Part 64, must submit a statement indicating your source's compliance status with any enhanced monitoring and compliance certification requirements of the federal Act.

Based on information and belief formed after reasonable inquiry, EPNG states that Roswell Compressor Station does not meet the applicability of 40 CFR 64.2. Specifically, no sources at the facility are controlled major sources of regulated pollutants, and enhanced monitoring requirements are not applicable at this time. EPNG will submit the necessary statement should the facility or requirements change such that this requirement becomes applicable.

19.2 - Compliance Status (20.2.70.300.D.10.a & 10.b NMAC)

Describe the facility's compliance status with each applicable requirement at the time this permit application is submitted. This statement should include descriptions of or references to all methods used for determining compliance. This statement should include descriptions of monitoring, recordkeeping and reporting requirements and test methods used to determine compliance with all applicable requirements. Refer to Section 2, Tables 2-N and 2-O of the Application Form as necessary. (20.2.70.300.D.11 NMAC) For facilities with existing Title V permits, refer to most recent Compliance Certification for existing requirements. Address new requirements such as CAM, here, including steps being taken to achieve compliance.

Based on information and belief formed after reasonable inquiry, EPNG believes that Roswell Compressor Station is in compliance with each requirement applicable to the facility.

Pursuant to Condition A109 of Operating Permit P-182-R4, EPNG has certified to compliance with the terms and conditions of that permit. EPNG has continued to be in compliance with applicable requirements as described in Section 13 of this application.

19.3 - Continued Compliance (20.2.70.300.D.10.c NMAC)

Provide a statement that your facility will continue to be in compliance with requirements for which it is in compliance at the time of permit application. This statement must also include a commitment to comply with other applicable requirements as they come into effect during the permit term. This compliance must occur in a timely manner or be consistent with such schedule expressly required by the applicable requirement.

As described in Section 19.2 and based on information and belief formed after reasonable inquiry, EPNG states that Roswell Compressor Station will continue to be operated in compliance with applicable requirements for which it is in compliance as of the date of submittal of this application.

In addition, EPNG will meet additional applicable requirements that become effective during the permit term in a timely manner or on such a time schedule as expressly required by the applicable requirement. In the event that EPNG should discover new information affecting the compliance status of the facility, EPNG will make appropriate notifications and/or take corrective actions as appropriate.

19.4 - Schedule for Submission of Compliance (20.2.70.300.D.10.d NMAC)

You must provide a proposed schedule for submission to the department of compliance certifications during the permit term. This certification must be submitted annually unless the applicable requirement or the department specifies a more frequent period. A sample form for these certifications will be attached to the permit.

Per Condition A109 of Title V Operating Permit P-182-R4, EPNG must submit compliance certification reports every 12 months, due no later than January 31st of each year. With this renewal application, EPNG seeks to retain this reporting schedule.

19.5 - Stratospheric Ozone and Climate Protection

In addition to completing the four (4) questions below, you must submit a statement indicating your source's compliance status with requirements of Title VI, Section 608 (National Recycling and Emissions Reduction Program) and Section 609 (Servicing of Motor Vehicle Air Conditioners).

-
1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances? ☒ Yes ☐ No
 2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? ☐ Yes ☒ No
(If the answer is yes, describe the type of equipment and how many units are at the facility.)
 3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? ☐ Yes ☒ No

4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.)

Based on information and belief formed after reasonable inquiry, EPNG states that Title VI, Section 608 (National Recycling and Emissions Reduction Program) of the Clean Air Act may apply to this facility, as EPMG may own CFC-containing refrigeration equipment meeting the criteria of this section. Specifically, 40 CFR 82, Subpart F, which applies to owners of CFC-containing appliances (40 CFR 82.150(b) and 40 CFR 82.152). EPNG may own appliances affected by this subpart and abides by this regulation. EPNG is in compliance with the requirements of this Section.

19.6 - Compliance Plan and Schedule

Applications for sources, which are not in compliance with all applicable requirements at the time the permit application is submitted to the department, must include a proposed compliance plan as part of the permit application package. This plan shall include the information requested below:

A. Description of Compliance Status: (20.2.70.300.D.11.a NMAC)

A narrative description of your facility's compliance status with respect to all applicable requirements (as defined in 20.2.70 NMAC) at the time this permit application is submitted to the department.

B. Compliance plan: (20.2.70.300.D.11.B NMAC)

A narrative description of the means by which your facility will achieve compliance with applicable requirements with which it is not in compliance at the time you submit your permit application package.

C. Compliance schedule: (20.2.70.300D.11.c NMAC)

A schedule of remedial measures that you plan to take, including an enforceable sequence of actions with milestones, which will lead to compliance with all applicable requirements for your source. This schedule of compliance must be at least as stringent as that contained in any consent decree or administrative order to which your source is subject. The obligations of any consent decree or administrative order are not in any way diminished by the schedule of compliance.

D. Schedule of Certified Progress Reports: (20.2.70.300.D.11.d NMAC)

A proposed schedule for submission to the department of certified progress reports must also be included in the compliance schedule. The proposed schedule must call for these reports to be submitted at least every six (6) months.

E. Acid Rain Sources: (20.2.70.300.D.11.e NMAC)

If your source is an acid rain source as defined by EPA, the following applies to you. For the portion of your acid rain source subject to the acid rain provisions of title IV of the federal Act, the compliance plan must also include any additional requirements under the acid rain provisions of title IV of the federal Act. Some requirements of title IV regarding the schedule and methods the source will use to achieve compliance with the acid rain emissions limitations may supersede the requirements of title V and 20.2.70 NMAC. You will need to consult with the Air Quality Bureau permitting staff concerning how to properly meet this requirement.

NOTE: The Acid Rain program has additional forms. See www.env.nm.gov/air-quality/air-quality-title-v-operating-permits-guidance-page/. Sources that are subject to both the Title V and Acid Rain regulations are **encouraged** to submit both applications **simultaneously**.

Based on information and belief formed after reasonable inquiry and as described in Section 19.2, and with this filing, EPNG states that Roswell Compressor Station is in compliance with applicable requirements. No compliance plan, compliance schedule, or compliance reports are required.

19.7 - 112(r) Risk Management Plan (RMP)

Any major sources subject to section 112(r) of the Clean Air Act must list all substances that cause the source to be subject to section 112(r) in the application. The permittee must state when the RMP was submitted to and approved by EPA.

Based on information and belief formed after reasonable inquiry, EPNG states that Roswell Compressor Station is not subject to 40 CFR 68, Chemical Accident Prevention Provisions, because the facility does not handle greater than threshold quantities of certain flammable and/or toxic substances.

Additionally, as per 40 CFR 68.3 (definitions), the term "stationary sources" does not apply to transportation of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR parts 192, 193, or 195 (DOT Office of Pipeline Safety Regulations).

EPNG's Roswell Compressor Station is regulated under DOT Office of Pipeline Safety Regulations (49 CFR 192, 193, and 195). Therefore, it is not subject to 112(r).

19.8 - Distance to Other States, Bernalillo, Indian Tribes and Pueblos

Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B NMAC)?

(If the answer is yes, state which apply and provide the distances.)

This Facility will not operate within 50 miles from any other states, local pollution control programs, or Indian tribes and pueblos. Mescalero Apache Indian Reservation is ~52 miles (84 km) from the facility.

19.9 - Responsible Official

Responsible Official: Ted Meinhold

R.O. Address: 1001 Louisiana, Suite 1417, Houston, TX 77002

Phone: (713) 420-2765

R.O. Email: Ted_Meinhold@kindermorgan.com

Alternate Responsible Official: Don W. Perkins

A.R.O. Title: Operations Director Division 3

A.R.O. Address: 2527 Foresight Circle, Grand Junction, CO 81505

Phone: (520) 663-4224

A.R.O. email: don_perkins@kindermorgan.com

Section 20

Other Relevant Information

Other relevant information. Use this attachment to clarify any part in the application that you think needs explaining. Reference the section, table, column, and/or field. Include any additional text, tables, calculations or clarifying information.

Additionally, the applicant may propose specific permit language for AQB consideration. In the case of a revision to an existing permit, the applicant should provide the old language and the new language in track changes format to highlight the proposed changes. If proposing language for a new facility or language for a new unit, submit the proposed operating condition(s), along with the associated monitoring, recordkeeping, and reporting conditions. In either case, please limit the proposed language to the affected portion of the permit.

NAESB Day

EPNG would like to identify the North American Energy Standards Board (NAESB) Day as the basis for records tracking at Roswell Compressor Station and other facilities.

The United States uses six different standardized time zones from east to west; the energy industry uses a seventh time zone developed by the NAESB. This board serves as an industry platform for the development and promotion of industry practices and standards that lead to the seamless marketing of wholesale and retail natural gas and electricity. Since 2003, the NAESB Day has been recognized by its customers, the business community, participants, and federal and state regulatory entities. The NAESB Day is a 24-hour period derived from a uniform time zone that occurs simultaneously nationwide and is the basis of EPNG's COMET data acquisition system "day" data. Unit information defined and stored according to the NAESB Day includes monitored gas flows or volumes, hours of operation, maintenance and repair activities, and routine emissions.

Data obtained from outside agencies or submitted including test reports and summaries, pursuant to 20.2.7 NMAC reporting requirements is based on the "day" as defined by the local time zone.

Alternate Compliance Plan

Documents outlining the Alternative Compliance Plan (ACP) for this facility are attached. Additionally, the NMED conditional approval of this ACP has been attached.

ALT-082

On 02/15/2011, the US EPA announced their approval of the broadly applicable alternative test method ALT-082 as an alternative for 40 CFR 60, Appendix A, Reference Method 9. Attached is the Federal Register notice for EPA approval for ALT-082 and a redlined section of Roswell Compressor Station's TV Permit No: P128R4 demonstrating the inclusion of ALT-082 language in A111 Facility: 20.2.61 NMAC Opacity A. 20.2.61 NMAC Opacity Requirements (Units A-01, A-02, A-03 and AUX-A1).

than registrants will generally be allowed to sell, distribute, or use existing stocks until such stocks are exhausted, provided that such sale, distribution, or use is consistent with the terms of the previously approved labeling on, or that accompanied, the canceled products.

B. EPA Registration Nos. 065092-00001 and 075015-0001 Listed in Table 1 of Unit II.

The cancellation of these products will be effective December 15, 2014. Thereafter, registrants will be prohibited from selling or distributing these two pesticide products, except for export consistent with FIFRA section 17 or for proper disposal. Persons other than registrants will generally be allowed to sell, distribute, or use existing stocks until such stocks are exhausted, provided that such sale, distribution, or use is consistent with the terms of the previously approved labeling on, or that accompanied, the canceled products.

List of Subjects

Environmental protection, Pesticides and pests.

Dated: February 2, 2012.

Richard P. Keigwin, Jr.,

*Director, Pesticide Re-evaluation Division,
Office of Pesticide Programs.*

[FR Doc. 2012-2982 Filed 2-14-12; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[FRL-9632-6]

Public Water System Supervision Program Approval for the State of Illinois; Tentative Approval

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: Notice is hereby given that the State of Illinois submitted a primacy application for its approved Public Water System Supervision Program. Illinois is applying its Long Term 2 Enhanced Surface Water Treatment Regulations to all Illinois water systems that use surface water and ground water under the influence of surface water as a source, thereby satisfying the requirements of the Long-Term 2 Enhanced Surface Water Treatment Rule. Illinois is also applying its Stage 2 Disinfectants and Disinfection By-products Regulations to all Illinois community and noncommunity water systems that add and/or deliver water that is treated with a primary or residual disinfectant other than ultraviolet light,

thereby satisfying the requirements of the Stage 2 Disinfectants and Disinfection Byproducts Rule.

EPA has determined that the state regulations and procedures submitted by the State to EPA for review are no less stringent than the corresponding federal regulations. Therefore, EPA intends to award primacy to Illinois for Long-Term 2 Enhanced Surface Water Treatment and Stage 2 Disinfectants and Disinfection By-product Rules implementation. Any interested party may request a public hearing. A request for a public hearing must be submitted by March 16, 2012, to the Regional Administrator at the EPA Region 5 address shown below. The Regional Administrator may deny frivolous or insubstantial requests for a hearing. However, if a substantial request for a public hearing is made by March 16, 2012; EPA Region 5 will hold a public hearing. If EPA Region 5 does not receive a timely and appropriate request for a hearing and the Regional Administrator does not elect to hold a hearing on her own motion, this determination shall become final and effective on March 16, 2012. Any request for a public hearing shall include the following information: The name, address, and telephone number of the individual, organization, or other entity requesting a hearing; a brief statement of the requesting person's interest in the Regional Administrator's determination and a brief statement of the information that the requesting person intends to submit at such hearing; and the signature of the individual making the request, or, if the request is made on behalf of an organization or other entity, the signature of a responsible official of the organization or other entity.

ADDRESSES: All documents relating to this determination are available for inspection at the following offices: Illinois Pollution Control Board at the James R. Thompson Center, 100 W. Randolph, Suite 11-500, Chicago, Illinois 60601, and the United States Environmental Protection Agency, Region 5, Ground Water and Drinking Water Branch (WG-15J), 77 West Jackson Boulevard, Chicago, Illinois 60604.

FOR FURTHER INFORMATION CONTACT: Janet Kuefler, EPA Region 5, Ground Water and Drinking Water Branch, at the address given above, by telephone at (312) 582-5814, or at kuefler.janet@epa.gov.

Authority: Section 1413 of the Safe Drinking Water Act, as amended, 42 U.S.C. 300g-2 (1996), and 40 CFR part 142 of the

National Primary Drinking Water Regulations.

Dated: January 23, 2012.

Susan Hedman,

Regional Administrator, Region 5.

[FR Doc. 2012-3588 Filed 2-14-12; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OAR-2007-1196; FRL-9631-7]

Recent Postings of Broadly Applicable Alternative Test Methods

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice of availability.

SUMMARY: This notice announces the broadly applicable alternative test method approval decisions the EPA has made under and in support of New Source Performance Standards (NSPS) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) under the Clean Air Act (CAA) in 2011.

FOR FURTHER INFORMATION CONTACT: An electronic copy of each alternative test method approval document is available on the EPA's Web site at www.epa.gov/ttn/emc/approalt.html. For questions about this notice, contact Ms. Lula H. Melton, Air Quality Assessment Division, Office of Air Quality Planning and Standards (E143-02), Environmental Protection Agency, Research Triangle Park, NC 27711; telephone number: 919-541-2910; fax number: 919-541-0516; email address: melton.lula@epa.gov. For technical questions about individual alternative test method decisions, refer to the contact person identified in the individual approval documents.

SUPPLEMENTARY INFORMATION:

I. General Information

A. Does this notice apply to me?

This notice will be of interest to entities regulated under 40 Code of Federal Regulations (CFR) parts 59, 60, 61, and 63, state, local, and tribal agencies, and the EPA Regional Offices responsible for implementation and enforcement of regulations under 40 CFR parts 60, 61, and 63.

B. How can I get copies of this information?

You may access copies of the broadly applicable alternative test method approval documents from the EPA's Web site at www.epa.gov/ttn/emc/approalt.html.

II. Background

Broadly applicable alternative test method approval decisions made by the EPA in 2011 under the National Volatile Organic Compound Emission Standards for Consumer and Commercial Products, 40 CFR part 59, NSPS, 40 CFR part 60, and NESHAP, 40 CFR parts 61 and 63 are identified in this notice (see Table 1). Source owners and operators may voluntarily use these broadly applicable alternative test methods subject to their specific applicability. Use of these broadly applicable alternative test methods does not change the applicable emission standards.

As explained in a previous **Federal Register** notice published at 72 FR 4257 (January 30, 2007) and found on the EPA's Web site at www.epa.gov/ttn/emc/approalt.html, the EPA Administrator has the authority to approve the use of alternative test methods to comply with requirements under 40 CFR parts 60, 61, and 63. This authority is found in sections 60.8(b)(3), 61.13(h)(1)(ii), and 63.7(e)(2)(ii). In the past, we have performed thorough technical reviews of numerous requests for alternatives and modifications to test methods and procedures. Based on these reviews, we have often found that these changes or alternatives would be equally valid and appropriate to apply to other sources within a particular class, category, or subcategory. Consequently, we have concluded that, where a method modification or an

alternative method is clearly broadly applicable to a class, category, or subcategory of sources, it is both more equitable and efficient to approve its use for all appropriate sources and situations at the same time.

It is important to clarify that alternative methods are not mandatory but permissive. Sources are not required to employ such a method but may choose to do so in appropriate cases. Source owners or operators should review the specific broadly applicable alternative method approval decision on the EPA's Web site at <http://www.epa.gov/ttn/emc/approalt.html> before electing to employ it. As per 63.7(f)(5), by electing to use an alternative method for 40 CFR part 63 standards, the source owner or operator must continue to use the alternative method until approved otherwise.

The criteria for approval and procedures for submission and review of broadly applicable alternative test methods are outlined at 72 FR 4257 (January 30, 2007). We will continue to announce approvals for broadly applicable alternative test methods on the EPA's Web site at www.epa.gov/ttn/emc/approalt.html and annually publish a notice that summarizes approvals for broadly applicable alternative test methods.

This notice comprises a summary of ten such approval documents added to our Technology Transfer Network from January 1, 2011, through December 31, 2011. The alternative method decision

letter/memo number, the reference method affected, sources allowed to use this alternative, and the modification or alternative method allowed are summarized in Table 1 of this notice. Please refer to the complete copies of these approval documents available from the EPA's Web site at www.epa.gov/ttn/emc/approalt.html as the table serves only as a brief summary of the broadly applicable alternative test methods. If you are aware of reasons why a particular alternative test method approval that we issued should not be broadly applicable, we request that you make us aware of the reasons in writing, and we will revisit the broad approval. Any objection to a broadly applicable alternative test method, as well as the resolution of that objection, will be announced on the EPA's Web site at www.epa.gov/ttn/emc/approalt.html and in the subsequent **Federal Register** notice. If we decide to retract a broadly applicable test method, we would continue to grant case-by-case approvals, as appropriate, and would (as states, local and tribal agencies and the EPA Regional Offices should) consider the need for an appropriate transition period for users either to request case-by-case approval or to transition to an approved method.

Dated: February 9, 2012.

Mary E. Henigin,

Acting Director, Office of Air Quality Planning and Standards.

TABLE 1—APPROVED ALTERNATIVE TEST METHODS AND MODIFICATIONS TO TEST METHODS REFERENCED IN OR PUBLISHED UNDER APPENDICES IN 40 CFR PARTS 59, 60, 61, AND 63 MADE BETWEEN JANUARY 2011 AND DECEMBER 2011

Alternative method decision letter/memo No.	As an alternative or modification to . . .	For . . .	You may . . .
ALT-068	Method 24—Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings.	Sources subject to 40 CFR part 59, subpart D—National Volatile Organic Emissions for Architectural Coatings.	Use method in 40 CFR part 59, subpart D, Appendix A in lieu of Method 24.
ALT-081	Method 25C—Determination of Non-methane Organic Compounds (NMOC) in Landfill Gases.	Sources subject to 40 CFR part 60, subpart WWW—Standards of Performance for Municipal Solid Waste Landfills.	Use a combination of Method 25C probes and leachate vents and gas wells to collect NMOC samples.
ALT-082	Method 9—Visual Determination of the Opacity of Emissions from Stationary Sources.	Sources subject to 40 CFR parts 60, 61, and 63.	Use the American Society for Testing and Materials (ASTM) D 7520-09 with specified limitations in lieu of Method 9.
ALT-084	ASTM D 6216-98	Continuous opacity monitoring systems (COMS) specified in Performance Specification 1 (PS-1) of 40 CFR, part 60, Appendix B.	Certify your COMS with either ASTM D 6216-98, D 6216-03, or D 6216-07.
ALT-085	ASTM D 4084-07	Sources subject to 40 CFR part 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.	Use ASTM D 5504-08 to determine the hydrogen sulfide concentration in fuel gas at boilers in lieu of ASTM D 4084-07.

TABLE 1—APPROVED ALTERNATIVE TEST METHODS AND MODIFICATIONS TO TEST METHODS REFERENCED IN OR PUBLISHED UNDER APPENDICES IN 40 CFR PARTS 59, 60, 61, AND 63 MADE BETWEEN JANUARY 2011 AND DECEMBER 2011—Continued

Alternative method decision letter/memo No.	As an alternative or modification to . . .	For . . .	You may . . .
ALT-086	ASTM D 3792 (GC Procedure) or ASTM D 4017 (Karl Fisher Titration).	Sources subject to 40 CFR parts 60, 61, and 63.	Use ASTM D 7358-07 to determine the water content of coatings in lieu of ASTM D 3792 or ASTM D 4017.
ALT-087	Conducting a stratification test as required by Method 7E when testing reciprocating internal combustion engines.	Sources subject to 40 CFR part 60, subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.	Use single-point sampling at the centroid of the exhaust when using Method 7E to determine NO _x emissions from Federally-regulated engines.
ALT-088	Using a mass flowmeter calibrated against Method 2—Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot Tube).	Sources subject to 40 CFR part 60, subpart WWW—Standards of Performance for Municipal Solid Waste Landfills.	Use the mass flowmeter recently calibrated by the manufacturer for measuring flow rate in lieu of calibration by Method 2.
ALT-089	ASTM D 4084-07	Sources subject to 40 CFR part 63, subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters.	Use Method 15 to measure H ₂ S in refinery fuel gas in lieu of ASTM D 4084-07.
ALT-090	Determining vapor pressure required by 40 CFR part 60, subpart Kb.	Source applicability determination in accordance with Section 60.110b of 40 CFR part 60, subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.	Use the “Test Method for Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatography” dated May 28, 2002 by David Littlejohn and Donald Lucas to measure vapor pressure of any volatile organic liquid containing heavy crude oil.

Source owners or operators should review the specific broadly applicable alternative method approval letter on the EPA's Web site at www.epa.gov/ttn/emc/approalt.html before electing to employ it.

[FR Doc. 2012-3581 Filed 2-14-12; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[FRL-9632-3]

Request for Nominations to the National and Governmental Advisory Committees to the U.S. Representative to the Commission for Environmental Cooperation

AGENCY: Environmental Protection Agency.

ACTION: Notice of request for nominations.

SUMMARY: The U.S. Environmental Protection Agency (EPA) is inviting nominations from a diverse range of qualified candidates to be considered for appointment to fill vacancies on the

National Advisory Committee (NAC) and the Governmental Advisory Committee (GAC) to the U.S. Representative to the Commission for Environmental Cooperation (CEC). Vacancies on these two committees are expected to be selected by March 31, 2012. We encourage nominations to be submitted as soon as possible. Additional sources may be utilized in the solicitation of nominees.

SUPPLEMENTARY INFORMATION: The National Advisory Committee and the Governmental Advisory Committee advise the EPA Administrator in her capacity as the U.S. Representative to the CEC Council. The Committees are authorized under Articles 17 and 18 of the North American Agreement on Environmental Cooperation (NAAEC), the North American Free Trade Agreement (NAFTA) Implementation Act, Public Law 103-182, and as directed by Executive Order 12915, entitled “Federal Implementation of the North American Agreement on Environmental Cooperation.” The Committees are responsible for providing advice to the United States

Representative on a wide range of strategic, scientific, technological, regulatory and economic issues related to implementation and further elaboration of the NAAEC. The National Advisory Committee consists of 13 representatives from environmental non-profit groups, business and industry, and educational institutions. The Governmental Advisory Committee consists of 12 representatives from state, local, and tribal governments. Members are appointed by the EPA Administrator for a two-year term. The Committees usually meet 3 times per year and the average workload for committee members is approximately 10 to 15 hours per month. Members serve on the committees in a voluntary capacity. Although we are unable to provide compensation or an honorarium for your services, you may receive travel and per diem allowances, according to applicable federal travel regulations. EPA is seeking nominations from all sectors, including academia, industry, non-governmental organizations, and state, local and tribal governments. Nominees will be considered according



MICHELLE LUJAN GRISHAM
GOVERNOR

HOWIE C. MORALES
LT. GOVERNOR

NEW MEXICO
ENVIRONMENT DEPARTMENT

525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505-1816
Phone (505) 476-4300
Fax (505) 476-4375
www.env.nm.gov



JAMES C. KENNEY
CABINET SECRETARY

JENNIFER J. PRUETT
DEPUTY SECRETARY

Air Quality Bureau
TITLE V OPERATING PERMIT
Issued under 20.2.70 NMAC

Certified Mail No:
Return Receipt Requested

Operating Permit No: P128-R4
Facility Name: Roswell Compressor Station

Facility Owner/Operator: El Paso Natural Gas Company, LLC.
Mailing Address: 5151 East Broadway Boulevard, Suite 1680
Tucson, AZ. 85711

TEMPO/IDEA ID No: 6-PRT20180001
AIRS No: 35 0050004

Permitting Action: TV Renewal
Source Classification: Title V Major

Facility Location: 541,740m E by 3,730,290m N; Zone 13; Datum
WGS84
County: Chaves

Air Quality Bureau Contact: Rebecca Procter
Main AQB Phone No. (505) 476-4300

TV Permit Expiration Date: 7/23/2025

TV Renewal Application Due: 7/23/2024

Elizabeth Kuehn
Digitally signed by Elizabeth
Kuehn
Date: 2020.07.23 20:22:49
-06'00'

Liz Bisbey-Kuehn
Bureau Chief
Air Quality Bureau

7/23/2020

Date

TABLE OF CONTENTS

Part A	FACILITY SPECIFIC REQUIREMENTS	3
A100	Introduction	3
A101	Permit Duration (expiration)	3
A102	Facility: Description	3
A103	Facility: Applicable Regulations and Non-Applicable Regulations.....	4
A104	Facility: Regulated Sources.....	5
A105	Facility: Control Equipment.....	6
A106	Facility: Allowable Emissions.....	6
A107	Facility: Allowable Startup, Shutdown, & Maintenance (SSM) and Malfunction Emissions	6
A108	Facility: Hours of Operation.....	9
A109	Facility: Reporting Schedules (20.2.70.302.E NMAC)	9
A110	Facility: Fuel and Fuel Sulfur Requirements (as required)	9
A111	Facility: 20.2.61 NMAC Opacity	9
Oil and Gas Industry		11
A200	Oil and Gas Industry	11
A201	Engines.....	11
PART B	GENERAL CONDITIONS (Attached)	
PART C	MISCELLANEOUS: Supporting On-Line Documents; Definitions; Acronyms (Attached)	

A108 Facility: Hours of Operation

- A. This facility is authorized for continuous operation, except for the limit on operating hours for unit AUX-A1. Monitoring, recordkeeping, and reporting are not required to demonstrate compliance with continuous hours of operation.

A109 Facility: Reporting Schedules (20.2.70.302.E NMAC)

- A. A Semi-Annual Report of monitoring activities is due within 45 days following the end of every 6-month reporting period. The six-month reporting periods start on January 1st and July 1st of each year.
- B. The Annual Compliance Certification Report is due within 30 days of the end of every 12-month reporting period. The 12-month reporting period starts on January 1st of each year.

A110 Facility: Fuel and Fuel Sulfur Requirements (as required)

- A. Fuel and Fuel Sulfur Requirements (Units A-01, A-02, A-03 and AUX-A1)

Requirement: All combustion emission units shall combust only natural gas containing no more than 5.0 grains of total sulfur per 100 dry standard cubic feet. (NSR Permit #3375-R3, Table 2.1, rev.)

Monitoring: None. Compliance is demonstrated through recordkeeping.

Recordkeeping:

(1) The permittee shall demonstrate compliance with the natural gas limit on total sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, or fuel gas analysis, specifying the allowable limit or less.

(2) If a fuel gas analysis is used, the analysis shall not be older than one year. The permittee shall keep records in accordance with Section B109.

Reporting: The permittee shall report in accordance with Section B110.

A111 Facility: 20.2.61 NMAC Opacity

- A. 20.2.61 NMAC Opacity Requirements (Units A-01, A-02, A-03 and AUX-A1)

Requirement: Visible emissions from all stationary combustion emission stacks shall not equal or exceed an opacity of 20 percent in accordance with the requirements at 20.2.61.109 NMAC.

Monitoring:

(1) Use of natural gas fuel constitutes compliance with 20.2.61 NMAC unless opacity equals or exceeds 20% averaged over a 10-minute period. When any visible emissions are

observed during operation other than during startup mode, opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method ~~(EPA Method 9)~~ or Alternative Test Method ALT-82 as required by 20.2.61.114 NMAC, or the operator will be allowed to shut down the equipment to perform maintenance/repair to eliminate the visible emissions. Following completion of equipment maintenance/repair, the operator shall conduct visible emission observations following startup in accordance with the following procedures:

- (a) Visible emissions observations shall be conducted over a 10-minute period during operation after completion of startup mode in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 22 ~~(EPA Method 22)~~. If no visible emissions are observed, no further action is required.
- (b) If any visible emissions are observed during completion of the Reference EPA Method 22 observation, subsequent opacity observations shall be conducted over a 10-minute period, in accordance with the procedures at Reference EPA Method 9 or Alternative method ALT-082 as required by 20.2.61.114 NMAC.

For the purposes of this condition, *Startup mode* is defined as the startup period that is described in the facility's startup plan.

Recordkeeping:

- (1) If any visible emissions observations were conducted, the permittee shall keep records in accordance with the requirements of Section B109 and as follows:
 - (a) For any visible emissions observations conducted in accordance with EPA Method 22, record the information on the form referenced in EPA Method 22, Section 11.2.
 - (b) For any opacity observations conducted in accordance with the requirements of EPA Method 9, record the information on the form referenced in EPA Method 9 or Alternative method ALT-082, Sections 2.2 and 2.4.

Reporting: The permittee shall report in accordance with Section B110.



New Mexico Ozone Precursor Rule Alternative Compliance Plan

Submitted to:
New Mexico Environmental Department
Air Quality Bureau - Compliance & Enforcement Section
1190 St. Francis Dr. Suite N4050
Santa Fe, NM 87505

June 2023
Revision 1: August 2023
Revision 2: January 2024

New Mexico Alternative Compliance Plan

January 2024

Contents

1	Executive Summary	3
2	Regulatory Background.....	5
3	Alternative Compliance Plan	7

List of Tables

Table 1-1	Comparison of Proposed ACP and 20.2.50.113 Total Allowable Emissions	4
Table 2-1	Emission Standards For Existing Natural Gas-Fired Spark Ignition Engines.....	5
Table 2-2	Emission Standards For Existing Stationary Combustion Turbines.....	5
Table 2-3	Engine and Turbine Compliance Schedule	6
Table 3-1	NOx Compliance Schedule Under the Ozone Precursor Rule and the Proposed ACP	7
Table 3-2	CO Compliance Schedule Under the Ozone PRecursor Rule and the Proposed ACP.....	8

List of Appendices

Appendix A	ACP Control Technology Summary and Implementation Schedule
------------	--

1 Executive Summary

The New Mexico Environmental Department (NMED) proposed, and the New Mexico Environment Improvement Board (Board) adopted, the Ozone Precursor rule under 20.2.50 NMAC to reduce ozone precursor emissions—specifically nitrogen oxides (“NO_x”) and volatile organic compounds (“VOCs”)—at sources causing or contributing to ambient ozone concentrations that exceed ninety-five percent of the national ambient air quality standard for ozone. The Ozone Precursor Rule also sets carbon monoxide (CO) emission limits in conjunction with the NO_x and VOC limits. In lieu of meeting the emission standards established under 20.2.50.113 for stationary natural gas-fired combustion engines and turbines, owners and operators may elect to comply with the emission standards through an Alternative Compliance Plan (ACP) and/or an Alternate Emission Standard (AES) approved by the department.

Kinder Morgan, Inc. (Kinder Morgan) on behalf of itself and its subsidiaries and affiliates El Paso Natural Gas Company, L.L.C. (EPNG), Natural Gas Pipeline of America (NGPL), and TransColorado Gas Transmission Company LLC (TC) (collectively “Kinder Morgan”) request approval of an ACP for the stationary natural gas-fired combustion engines and turbines identified in Appendix A, attached hereto. The proposed ACP demonstrates that Kinder Morgan will achieve a greater reduction in emissions than if emission standards were applied individually to each engine or turbine separately. The proposed ACP does not include NMNEHC emissions because all units subject to 20.2.50.113 currently meet the NMNEHC standards established under 20.2.50.113 for existing stationary natural gas-fired combustion engines and turbines.

This ACP addresses CO emissions from all subject units in the Kinder Morgan fleet and NO_x emissions from units not addressed in the separately submitted plan for NO_x that comply with 20.2.50.113 NMAC through an Alternative Emission Standards, pursuant to 20.2.50.113(B)(11) NMAC.¹ Table 1-1 summarizes the total amount of allowable emissions under the proposed ACP compared to the total allowable emissions under 20.2.50.113 for existing engines and turbines. If approved by NMED Kinder Morgan will meet the total allowable emissions established under the emission standards of 20.2.50.113 by January 1, 2028, for both engines and turbines, a year before the compliance schedule outlined in the rule for engines. Under the proposed ACP, Kinder Morgan will achieve a total NO_x reduction of 731.3 tons by January 1, 2028. Of which, 92% of NO_x reduction will be in the Permian Basin.

¹ See Statement of Reasons, at 111 (Section 113 “offers significant flexibility for sources that are unable to meet the emissions standards of Part 50: they may reduce the annual hours of operation, they may seek an Alternative Compliance Plan ACP to meet an equivalent amount of emission reductions, **and/or** they may seek alternative emissions standards if they can demonstrate that they cannot meet the existing standards through an ACP”) (emphasis added).

Table 1-1 Comparison of Proposed ACP and 20.2.50.113 Total Allowable Emissions

Pollutant	Scenario	TPY Total Allowable Emissions	ACP Total Proposed Emissions Meet 20.2.50.113 Total Allowable Emissions?
NO _x	Proposed ACP	1,007.5	Yes
	20.2.50.113 Total Allowable Emissions ¹	1,064.6	
CO	Proposed ACP	597.2	Yes
	20.2.50.113 Total Allowable Emissions ¹	601.8	

1 - To be conservative, Kinder Morgan is using the lower of the current permit limits and the allowable mass emissions under the ozone precursor rule to establish the final allowable NO_x and CO emission rates for the ACP.

2 Regulatory Background

The Board adopted the Ozone Precursor rule under 20.2.50 NMAC to reduce ozone precursor emissions—specifically nitrogen oxides (“NOx”) and volatile organic compounds (“VOCs”)—at sources causing or contributing to ambient ozone concentrations that exceed ninety-five percent of the national ambient air quality standard for ozone. Sources located in Chaves, Dona Ana, Eddy, Lea, Rio Arriba, Sandoval, San Juan, and Valencia counties are subject to the rule. Kinder Morgan owns and operates multiple stationary natural gas-fired spark ignition engines and stationary natural gas-fired combustion turbines with a maximum design rating equal to or greater than 1,000 hp located at 12 different facilities in counties subject to 20.2.50 NMAC.

Applicable existing portable or stationary natural gas-fired spark ignition engines, compression ignition engines, or natural gas-fired combustion turbines shall meet the emissions standards in 20.2.50.113 listed in Table 2-1 and Table 2-2. Owners or operators shall comply with the emission standards for a specified percentage of all the company’s equipment subject to the standards by the dates specified in Table 2-3 below.

Table 2-1 Emission Standards for Existing Natural Gas-Fired Spark Ignition Engines

Engine Type	Rated bhp	NOx	CO	NMNEHC (as propane)
2 Stroke Lean Burn	>1,000	3.0 g/bhp-hr	0.60 g/bhp-hr	0.70 g/bhp-hr
4-Stroke Lean Burn	>1,000 bhp and <1,775 bhp	2.0 g/bhp-hr	0.60 g/bhp-hr	0.70 g/bhp-hr
4-Stroke Lean Burn	≥1,775 bhp	0.5 g/bhp-hr	0.60 g/bhp-hr	0.70 g/bhp-hr
Rich Burn	>1,000 bhp	0.5 g/bhp-hr	0.60 g/bhp-hr	0.70 g/bhp-hr

Table 2-2 Emission Standards for Existing Stationary Combustion Turbines

Turbine Rating (bhp)	NOx (ppmvd @15% O ₂)	CO (ppmvd @ 15% O ₂)	NMNEHC (as propane, ppmvd @15% O ₂)
≥1,000 and <4,100	150	50	9
≥4,100 and <15,000	50	50	9
≥15,000	50	50 or 93% reduction	5 or 50% reduction

Table 2-3 Engine and Turbine Compliance Schedule

Unit	30% Compliance Due Date	65% Compliance Due Date	100% Compliance Due Date
Engines	January 1, 2025	January 1, 2027	January 1, 2029
Turbines	January 1, 2024	January 1, 2026	January 1, 2028

In lieu of meeting the emission standards established under 20.2.50.113 for portable and stationary natural gas-fired combustion engines and turbines, owners and operators may elect to comply with the emission standards through an ACP approved by NMED. In particular, the Board adopted Paragraphs (10) and (11) of Subsection B of 20.2.50.113 NMAC “for the reasons stated in the NMED Rebuttal . . . and the supporting argument by Kinder Morgan.” State of New Mexico, Environmental Improvement Board, Statement of Reasons and Final Order, In the Matter of Proposed New Regulation 20.2.50 NMAC – Oil and Gas Sector – Ozone Precursor Pollutants, No. EIB 21-27, at pp. 111 (June 27, 2022) (hereinafter, Statement of Reasons). In particular, and citing to Kinder Morgan’s supporting argument in the Board rulemaking, the Board stated that “[w]hile the emissions thresholds provided in Tables 1 and 3 for existing engines and turbines are appropriate in most cases, circumstances may exist where it is technically impracticable or economically infeasible to achieve compliance.” *Id.* at 111. Recognizing these practical limitations, the Board’s final rule “offers significant flexibility for sources that are unable to meet the emissions standards of Part 50: they may reduce the annual hours of operation, they may seek an Alternative Compliance Plan ACP to meet an equivalent amount of emission reductions, and/or they may seek alternative emissions standards if they can demonstrate that they cannot meet the existing standards through an ACP.” *Id.* at 111 (emphasis added). Thus, an operator may have in place both an AES (or multiple AESs for individual units), and an ACP.

The purpose of this report is to meet the requirement from 20.2.50.113(10) as follows:

“In lieu of complying with the emission standards for individual engines and turbines established in Subsection B of 20.2.50.113 NMAC, an owner or operator may elect to comply with the emission standards through an Alternative Compliance Plan (ACP) approved by the department. An ACP must include the list of engines or turbines subject to the ACP, and a demonstration that the total allowable emissions for the engines or turbines subject to the ACP will not exceed the total allowable emissions under the emission standards of this Part.”

3 Alternative Compliance Plan

To establish a baseline of equivalent emission reductions per year, Kinder Morgan calculated emissions for each engine or turbine if it were to meet the emissions standard set in the ozone rule (20.2.50.113.B) on a unit-by-unit basis for those units covered by the ACP. The allowable mass emissions under the ozone rule are then compared to the current permit limits. To be conservative, Kinder Morgan is using the lower of the current permit limits and the allowable mass emissions under the ozone precursor rule to establish the final allowable NOx and CO emission rates for the ACP. Using the compliance schedule outlined in 20.2.50.113.B.2 for existing stationary natural gas-fired spark ignition engines and 20.2.50.113.B.7 for stationary natural gas-fired combustion turbines, Kinder Morgan determined the associated emission reductions for each year beginning with current permitted emissions, and projecting through January 1, 2029. This was then compared with the planned ACP schedule of emission control implementations.

Table 3-1 and 3-2 show the current permitted NOx and CO emissions for units addressed in the ACP, annual milestones required by 20.2.50.113 and achieved by the proposed ACP based on the schedules outlined in 20.2.50.113.B.(2) and (7).

Table 3-1 NOx Compliance Schedule under the Ozone Precursor Rule and the Proposed ACP

		Allowable Emissions under 20.2.50.113 (tpy)	ACP Proposed Emissions (tpy)
Current Permitted Emissions		1738.8	1738.8
20.2.50.113 Annual Milestones	1/1/2024	1718.5	1652.4
	1/1/2025	1536.5	1441.4
	1/1/2026	1512.8	1392.6
	1/1/2027	1300.6	1007.5
	1/1/2028	1276.8	1007.5
	1/1/2029	1064.6	1007.5
Final per 20.2.50.113		1064.6	1007.5

Table 3-2 CO Compliance Schedule under the Ozone Precursor Rule and the Proposed ACP

		Allowable Emissions (tpy)	ACP Proposed Emissions (tpy)
Current		1253.2	1253.2
20.2.50.113 Annual Milestones	1/1/2024	1192.2	1181.7
	1/1/2025	1057.8	1039.4
	1/1/2026	986.7	833.1
	1/1/2027	829.8	816.5
	1/1/2028	758.7	597.2
	1/1/2029	601.8	597.2
Final per 20.2.50.113		601.8	597.2

If approved by NMED, as demonstrated by Tables 3-1 & 3-2, Kinder Morgan will meet the total allowable emissions established under the emission standards of 20.2.50.113 by January 1, 2028, for both engines and turbines, a year before the compliance schedule outlined in the rule for engines and turbines.

NOx reductions will be attained by adding low emission combustion (LE) upgrades on selected engines, and exchanging a Solar turbine component with a lower NOx component on selected turbines. The LE upgrades include a software update and tuning on the controls. The Solar turbine component exchange includes installation of the Solar SoloNOx system. CO emissions will be reduced by installing oxidation catalysts on selected engines or submitting permit revision applications to establish lower CO permit limits based upon actual performance. The specific technology to be used on each unit is included in Appendix A.

Note, to be conservative, Kinder Morgan is using the lower of the current permit limits and the allowable mass emissions under the ozone precursor rule to establish the final allowable NOx and CO emission rates for the proposed ACP. In other words, Kinder Morgan is not claiming credit on reductions for existing units whose permitted limits are already below the allowable emission rates under the ozone precursor rule. Additionally, for each unit in the ACP, the proposed emission rate is provided on an hourly mass emission limit or performance limit basis consistent with the expected representation in the operating permits. These emission rates are converted to an annual basis assuming continuous operation (8,760 hr/yr). Emission reductions are calculated as the difference between the current permit limits and the proposed annual emission rate.

The ACP implementation or retrofitting schedule is depicted by the last column of Appendix A, to be completed in advance of the January 1 compliance date of the following calendar year.

Appendix A

ACP Control Technology Summary and Implementation Schedule

Appendix A: Control Technology Summary and Schedule

Compressor Station	Unit ID	Type	Current Permit Limits TPY		Ozone Rule Emission Standards g/hp-hr for engines; ppm for turbines		Total Allowable Under Ozone Rule (TPY)		Lower of Rule Emissions and Current Permit Limits (TPY)		Alternative Compliance Plan Summary	Total Emission Under ACP (PPH)		Total Emission Under ACP (TPY)		Total Reduction Under ACP (TPY)		Implementation Schedule By Year
			NOx	CO	NOx	CO	NOx	CO	NOx	CO		NOx	CO	NOx	CO	NOx	CO	
Caprock	A-01	Turbine	201.0	32.9	50.0	50.0	53.4	20.1	53.4	20.1	Subject to AES for NOx; Reduce CO permit limits to actual test results plus 20%	--	6.2	--	27.0	--	5.9	2024
Caprock	A-02	Turbine	172.1	34.5	50.0	50.0	32.9	20.1	32.9	20.1	Subject to AES for NOx; Reduce CO permit limits to actual test results plus 20%	--	5.1	--	22.4	--	12.1	2024
Eunice M/L	B-01	Turbine	83.2	26.3	50.0	50.0	39.2	18.4	39.2	18.4	Solar Taurus 60 component exchange to lower emissions to 25 ppm NOx and 25 ppm CO	25 PPM	25 PPM	25.4	10	57.8	16.3	2023
Eunice M/L	C-01	Turbine	25.4	30.9	50.0	50.0	50.8	28.9	25.4	28.9	Solar Taurus 60 component exchange to lower emissions to 9 ppm NOx and 25 ppm CO	9 PPM	25 PPM	7.0	10	18.39	20.9	2024
Eunice M/L	C-02	Turbine	25.4	30.9	50.0	50.0	50.8	30.7	25.4	30.7	Keep current NOx permit limits; Repermit to establish new CO limits	5.8	2.3	25.4	10	0.0	20.9	2023
Eunice M/L	C-03	Engine	36.5	9.1	0.5	0.6	17.1	20.6	17.1	9.1	Install low emission combustion (LE) technology to reduce NOx emissions; Keep current CO permit limits	0.5 g/hp-hr	2.1	17.1	9.1	19.4	0.0	2023
Monument Plant	A-01	Engine	125.0	11.8	3.0	0.6	29.0	5.8	29.0	5.8	Install low emission combustion (LE) technology to reduce NOx emissions; Add Oxidation Catalyst for 70% CO reduction	3.0 g/hp-hr	0.8	29.0	3.5	95.97	8.3	2024
Monument Plant	A-02	Engine	125.0	11.8	3.0	0.6	29.0	5.8	29.0	5.8	Install low emission combustion (LE) technology to reduce NOx emissions; Add Oxidation Catalyst for 70% CO reduction	3.0 g/hp-hr	0.8	29.0	3.5	95.97	8.3	2026
Monument Plant	A-03	Engine	125.0	11.8	3.0	0.6	29.0	5.8	29.0	5.8	Install low emission combustion (LE) technology to reduce NOx emissions; Add Oxidation Catalyst for 70% CO reduction	3.0 g/hp-hr	0.8	29.0	3.5	95.97	8.3	2026
Monument Plant	A-04	Engine	17.1	19.7	3.0	0.6	29.0	5.8	17.1	5.8	Keep Current Permit Limits	3.9	4.50	17.1	19.7	0.0	0.0	2027
Monument Plant	A-05	Engine	17.1	19.7	3.0	0.6	29.0	5.8	17.1	5.8	Keep Current Permit Limits	3.9	4.50	17.1	19.7	0.0	0.0	2027
Monument Plant	B-01	Engine	38.5	44.0	3.0	0.6	66.0	13.2	38.5	13.2	Keep Current Permit Limits	8.8	10.0	38.5	44.0	0.0	0.0	2027
Pecos River	A-01	Turbine	233.0	35.0	50.0	50.0	56.5	28.4	56.5	28.4	Subject to AES for NOx; Keep current CO permit limits	--	8.0	--	35.0	--	0.0	2025
Pecos River	A-02	Turbine	233.0	35.0	50.0	50.0	56.5	28.4	56.5	28.4	Subject to AES for NOx; Keep current CO permit limits	--	8.0	--	35.0	--	0.0	2025
Pecos River	A-03	Turbine	233.0	35.0	50.0	50.0	56.5	28.4	56.5	28.4	Subject to AES for NOx; Keep current CO permit limits	--	8.0	--	35.0	--	0.0	2025
Rio Vista	A-01	Turbine	17.5	29.2	150.0	50.0	17.5	10.0	17.5	10.0	Keep current NOx permit limits; Reduce CO permit limits to actual plus 20%	4.0	4.5	17.5	19.9	0.00	9.3	2024
Rio Vista	A-02	Turbine	17.5	29.2	150.0	50.0	17.5	10.0	17.5	10.0	Keep current NOx permit value and CO actual plus 20%	4.0	4.5	17.5	19.9	0.00	9.3	2024
Rio Vista	A-03	Turbine	62.2	17.0	50.0	50.0	38.4	23.3	38.4	17.0	Solar Centaur 50 component exchange to lower emissions to 15 ppm NOx and 25 ppm CO	15 PPM	25PPM	13.4	13.6	48.8	3.4	2025
Roswell	A-01	Engine	78.8	78.8	3.0	0.6	98.5	19.7	78.8	19.7	Keep current NOx permit limits; Add Oxidation Catalyst for 80% CO reduction	18.0	2.5	78.8	11.16024	0.0	67.6	2025
Roswell	A-02	Engine	78.8	78.8	3.0	0.6	98.5	19.7	78.8	19.7	Keep current NOx permit limits; Add Oxidation Catalyst for 80% CO reduction	18.0	2.5	78.8	11.2	0.0	67.6	2025
Roswell	A-03	Engine	78.8	78.8	3.0	0.6	98.5	19.7	78.8	19.7	Keep current NOx permit limits; Add Oxidation Catalyst for 80% CO reduction	18.0	2.5	78.8	11.2	0.0	67.6	2025
San Juan River	A-01	Turbine	17.5	29.2	150.0	50.0	17.5	10.0	17.5	10.0	Keep current NOx permit limits; Repermit CO to lower permit limits by 60%	4.0	2.7	17.5	11.7	0.00	17.5	2024
San Juan River	A-02	Turbine	17.5	29.2	150.0	50.0	17.5	10.0	17.5	10.0	Keep current NOx permit limits; Repermit CO to lower permit limits by 60%	4.0	2.7	17.5	11.7	0.00	17.5	2024
San Juan River	A-03	Turbine	17.5	29.2	150.0	50.0	17.5	10.0	17.5	10.0	Keep current NOx permit limits; Repermit CO to lower permit limits by 60%	4.0	2.7	17.5	11.7	0.00	17.5	2024
Washington Ranch Storage	A-01	Engine	119.5	119.5	3.0	0.6	130.4	26.1	119.5	26.1	Keep current NOx permit limits; Add Oxidation Catalyst for 80% CO reduction	27.3	2.2	119.5	9.8	0.0	109.7	2027
Washington Ranch Storage	B-02	Engine	119.5	119.5	3.0	0.6	130.4	26.1	119.5	26.1	Keep current NOx permit limits; Add Oxidation Catalyst for 80% CO reduction	27.3	2.2	119.5	9.8	0.0	109.7	2027
Maljamar	1	Engine	154.5	14.1	3.0	0.6	57.9	11.6	57.9	11.6	Install low emission combustion (LE) technology to reduce NOx emissions; Add Oxidation Catalyst for 80% CO reduction	3.0 g/hp-hr	0.6	57.9	2.7	96.60	11.4	2023 (CO) 2024 (NOx)
Maljamar	2	Engine	154.5	14.1	3.0	0.6	57.9	11.6	57.9	11.6	Install low emission combustion (LE) technology to reduce NOx emissions; Add Oxidation Catalyst for 80% CO reduction	3.0 g/hp-hr	0.6	57.9	2.7	96.60	11.4	2023 (CO) 2026 (NOx)
Maljamar	3	Engine	154.5	14.1	3.0	0.6	57.9	11.6	57.9	11.6	Install low emission combustion (LE) technology to reduce NOx emissions; Add Oxidation Catalyst for 80% CO reduction	3.0 g/hp-hr	0.6	57.9	2.7	96.60	11.4	2023 (CO) 2026 (NOx)
Blanco	389	Engine	16.0	4.0	0.5	0.6	11.4	13.7	11.4	4.0	Install low emission combustion (LE) technology to reduce NOx emissions; Keep current CO permit limits	0.5 g/hp-hr	0.9	11.4	4.0	4.6	0.0	2023
Blanco	390	Engine	16.0	4.0	0.5	0.6	11.4	13.7	11.4	4.0	Install low emission combustion (LE) technology to reduce NOx emissions; Keep current CO permit limits	0.5 g/hp-hr	0.9	11.4	4.0	4.6	0.0	2023
Afton	A-1	Turbine	224.5	35.7	50.0	50.0	51.4	28.6	51.4	28.6	Subject to AES for NOx; Keep current CO permit limits	--	8.1	--	35.7	--	0.0	2025
Afton	A-2	Turbine	224.5	35.7	50.0	50.0	51.4	28.6	51.4	28.6	Subject to AES for NOx; Keep current CO permit limits	--	8.1	--	35.7	--	0.0	2025
Afton	A-3	Turbine	224.5	35.7	50.0	50.0	51.4	28.6	51.4	28.6	Subject to AES for NOx; Keep current CO permit limits	--	8.1	--	35.7	--	0.0	2025
Belen	A-1	Turbine	169.0	34.5	50.0	50.0	34.9	20.1	34.9	20.1	Subject to AES for NOx; Reduce CO permit limits to actual test results plus 20%	--	5.1	--	22.4	--	12.1	2024
Belen	A-2	Turbine	169.0	34.5	50.0	50.0	34.9	20.1	34.9	20.1	Subject to AES for NOx; Reduce CO permit limits to actual test results plus 20%	--	5.1	--	22.4	--	12.1	2024
Total (TPY)			1738.8	1253.2			1247.6	639.0	1064.6	601.8				1007.49	597.2	731.3	656.0	



March 22, 2024

Weiwen Daly
Engineer, Air Permitting and Compliance
Kinder Morgan, Inc.
1667 Cole Blvd. Suite 300
Lakewood, Colorado 80401

Via electronic mail

Electronic mail: Weiwen_Daly@kindermorgan.com

Re: Conditional Approval of Alternative Compliance Plan submitted January 31, 2024 for the Ozone Precursor Rule

Dear Weiwen Daly,

Kinder Morgan, Inc. submitted to the Air Quality Bureau ("AQB") a revised proposed Alternative Compliance Plan ("ACP") on January 31, 2024. The plan contained a description and summary tables showing how Kinder Morgan expects to meet the engine and turbine performance standards at 20.2.50 NMAC ("Part 50"), Section 113 as a fleet. Part 50 allows companies to demonstrate alternative compliance with the standards by demonstrating that "the total allowable emissions for the engines or turbines subject to the ACP will not exceed the total allowable emissions under the emission standards ..." (20.2.50.113.B(10) NMAC) The Plan also contained a third-party certification that ACP meets Part 50 requirements.

The AQB posted the submission for public comment on February 1, 2024 with the public comment period running from February 1 to March 4, 2024. Kinder Morgan published notices in newspapers of general circulation on February 4, 2024, announcing the availability of the ACP for public comment. Kinder Morgan provided the AQB with affidavits of publishing for the *News-Sun* (Hobbs, NM), the *Carlsbad Current Argus* (City of Carlsbad, NM), the *Las Cruces Sun News* (Doña Ana County, NM), the *Farmington Daily Times* (Farmington, NM), and the *Albuquerque Journal* (Bernalillo County, NM).

The AQB received no public comments.

Following AQB analysis of the proposed ACP, the Department concurs that the ACP meets the requirements of Part 50, Section 113. The Department had previously issued an approval of Kinder Morgan's Alternative Emission Standards proposal for oxides of nitrogen ("NOx") emissions for ten turbines. Therefore, these units were excluded from NOx analysis. As all other engines and turbines meet or exceed NOx standards for individual engines, the AQB considers NOx emission standards to be met on an individual engine or turbine basis. The total carbon monoxide ("CO") allowable emissions to be achieved by 2028 are approximately 42 tons per year lower than the required CO emissions as a fleet. Further, AQB considers the overall plan timely according to the schedule submitted within the ACP.

The Department has determined that the ACP submitted in January 2024 is satisfactory and will serve to demonstrate compliance with Section 113 of Part 50 if all requirements in the ACP are followed. This includes permit revision and control installation deadlines. Due to limited resources, however, the AQB will require Kinder Morgan to propose an actual schedule of permit applications for all necessary changes to permits. This

Section 22: Certification

Company Name: El Paso Natural Gas, LLC

I, Donald Perkins, hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 24 day of May, 2024, upon my oath or affirmation, before a notary of the State of

Colorado

[Signature]
*Signature

5/24/2024
Date

Donald Perkins
Printed Name

Prador
Title

Scribed and sworn before me on this 24 day of May, 2024.

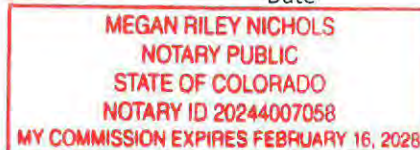
My authorization as a notary of the State of Colorado expires on the

16 day of February, 2028.

[Signature]
Notary's Signature

5/24/2024
Date

Megan Riley Nichols
Notary's Printed Name



*For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC.