

**NMED AIR QUALITY
TITLE V RENEWAL AND SIGNIFICANT
MODIFICATION APPLICATION
EL PASO NATURAL GAS COMPANY, L.L.C.
BELEN COMPRESSOR STATION**

Prepared By:

Adam Erenstein – Manager of Consulting Services

TRINITY CONSULTANTS

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

October 2024

Project 243201.0135





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

October 25, 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. – Belen 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 November 1, 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 Richard Duarte with El Paso Natural Gas Company, LLC at (505) 269-2794 or by email at ricardo_duarte@KinderMorgan.com.

Sincerely,

TRINITY CONSULTANTS

Adam Erenstein
Manager of Consulting Services

cc: Richard Duarte (El Paso natural Gas Company, LLC)
Trinity Project File 243201.0135

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		October 25, 2024
Permittee/Company Contact	Phone	Email
Richard Duarte	(505) 831-7763	Ricardo_Duarte@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.	

Mail 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:
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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: ☐ a 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.: N/A in the amount of N/A
- ☒ 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: **20.2.70.200.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 (see 1 st 3 to 5 #s of permit IDEA ID No.): 1590	Updating Permit/NOI #: P134-R4
1	Facility Name: Belen 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 Belen, NM, head east on NM-309 for approximately 1.3 miles. Turn right onto NM-47 and go approximately 4.9 miles. Turn right onto Turbine Road and go approximately 1.8 miles and then continue onto Escobar Place. Drive approximately 2.9 miles on Escobar Place and the facility will be on the right.		
2	Plant Operator Company Name: El Paso Natural Gas Company, L.L.C.	Phone/Fax: (719) 473-2300 / N/A	
a	Plant Operator Address: 2 North Nevada Ave., Colorado Springs, CO 80903		

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) 473-2300 / N/A
a	Plant Owner(s) Mailing Address(s): 2 North Nevada Ave., Colorado Springs, CO 80903	
4	Bill To (Company): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (719) 473-2300 / N/A
a	Mailing Address: 2 North Nevada Ave., Colorado Springs, CO 80903	E-mail: Ricardo_Duarte@kindermorgan.com
5	☐ Preparer: Trinity Consultants ☐ Consultant: Adam Erenstein	Phone/Fax: (505) 266-6611
a	Mailing Address: 9400 Holly Blvd NE, Building 3, Suite B, Albuquerque, NM 87122	E-mail: aerenstein@trinityconsultants.com
6	Plant Operator Contact: Rory Taylor	Phone/Fax: (505) 722-3634 / (505) 206-9256
a	Address: 84 El Paso Circle, Gallup, NM 87301	E-mail: Rory_Taylor@kindermorgan.com
7	Air Permit Contact: Richard Duarte	Title: Sr. EHS Engineer
a	E-mail: Ricardo_Duarte@kindermorgan.com	Phone/Fax: (505) 269-2794
b	Mailing Address: 100 Sun Ave. NE, Suite 650, Albuquerque, NM 87109	
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-134-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: 3262-M1
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
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*Capacities are provided for informational purposes only and are not intended to be an enforceable limit.

Section 1-D: Facility Location Information

1	Section: 36	Range: 2E	Township: 4N	County: Valencia	Elevation (ft): 5,045
2	UTM Zone: ☐ 12 or ☒ 13			Datum: ☐ NAD 27 ☐ NAD 83 ☒ WGS 84	
a	UTM E (in meters, to nearest 10 meters): 345,982			UTM N (in meters, to nearest 10 meters): 3,822,850	
b	AND Latitude (deg., min., sec.): 34° 32' 9"			Longitude (deg., min., sec.): -106° 40' 42"	
3	Name and zip code of nearest New Mexico town: Belen, 87002				
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From Belen, NM, head east on NM-309 for approximately 1.3 miles. Turn right onto NM-47 and go approximately 4.9 miles. Turn right onto Turbine Road and go approximately 1.8 miles and then continue onto Escobar Place. Drive approximately 2.9 miles on Escobar Place and the facility will be on the right				
5	The facility is 10.5 miles Southeast of Belen, NM.				
6	Status of land at facility (check one): ☒ Private ☐ Indian/Pueblo ☐ Federal BLM ☐ Federal Forest Service ☐ Other (specify)				
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; Tribes: None; Counties: Valencia and Socorro				
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: N/A- This is not a 20.2.72 NMAC application.				
9	Name nearest Class I area: Bosque del Apache				
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 74.4 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: 1966 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	($\frac{\text{hours}}{\text{year}}$): 8,760
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			
4	Month and year of anticipated construction completion: N/A			
5	Month and year of anticipated startup of new or modified facility: N/A			
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: Socorro Electric CO-OP 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.)
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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: Operations Vice President	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 Perkins		Phone: (413) 896-6097
a	A. R.O. Title: Operations Director	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.		
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.): N/A—El Paso Natural Gas Company, L.L.C. has no subsidiaries.		
6	Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: Richard Duarte, (505) 831-7763 and Larry Macias, (505) 722-3625		

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: Counties: Bernalillo County (~77 km) Tribes: Pueblo of Isleta (~24 km), Laguna Pueblo (~55 km), Canonicito Indian Reservation (~60 km), Alamo Band Navajo Indian Reservation (~63 km), Sandia Pueblo (~71 km), Acoma Pueblo (~77 km), States: None
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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-toe 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, (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.

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Change Log – Do **not** submit this page with your application.

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 #	Manufacturer's Rated Capacity ³ (Specify Units)	Requested Permitted Capacity ³ (Specify Units)	Date of Manufacture ²	Controlled by Unit #		Source Classification Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) ⁴	Replacing Unit No.
								Emissions vented to	Stack #				
A-1	Regenerative Cycle Turbine	General Electric	M3572R	127603	5700 hp	4737 hp	-	-	-	3.1E+07	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ Replacement Unit ☐ To Be Replaced	N/A	N/A
							~1957	S-001	-				
A-2	Regenerative Cycle Turbine	General Electric	M3572R	127604	5700 hp	4737 hp	-	-	-	3.1E+07	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ Replacement Unit ☐ To Be Replaced	N/A	N/A
							~1958	S-002	-				
AUX-A1	Auxiliary Backup RICE	CAT	G3406	CTS00420	150 kW	150 kW	-	-	-	2E+07	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ Replacement Unit ☐ To Be Replaced	SI, 4SRB	N/A
F-001	Facility-Wide Fugitives	-	-	-	-	-	-	-	-	3.1E+07	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ Replacement Unit ☐ To Be Replaced	N/A	N/A
SSM/M1	Startup, Shutdown, Maintenance and Malfunction	-	-	-	-	-	-	-	-	3.1E+07	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ Replacement Unit ☐ To Be Replaced	N/A	N/A
											☐ 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		
											☐ 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 20.2.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			
					Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction ²					
T-001	Lube Oil Tank	-	-	4500		IA List Item #5	Jan-56	☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced
T-002	East Used Below Grade Used Oil/Water	-	-	gal				☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	1000			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
T-003	North Below Grade Used Oil	-	-	gal		IA List Item #5	Apr-85	☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	1000			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
T-004	Used Oil	-	-	gal		IA List Item #5	Apr-85	☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	223			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
T-005	Antifreeze	-	-	gal		IA List Item #5	Apr-85	☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	1600			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
T-006	Antifreeze	-	-	gal		IA List Item #5	Jan-56	☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	300			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
T-007	Antifreeze	-	-	gal		IA List Item #5	Jan-74	☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	300			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
T-008	Antifreeze	-	-	gal		IA List Item #5	Jan-74	☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	300			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
T-009	Used Oil	-	-	gal		IA List Item #5	Jun-07	☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	gal			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
T-010	Used Oil/Water	-	-	~100		IA List Item #5	1985	☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
			-	gal			☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
						IA List Item #5		☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
							☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
						IA List Item #5		☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
							☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	
						IA List Item #5		☐ New/Additional	☐ Replacement Unit	☐ To be Replaced	
							☒ Existing (unchanged)	☐ To be Removed	☐ Replacement Unit	☐ To be Replaced	

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 20.2.72.203.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]

☒ This Table was intentionally left blank because it would be identical to Table 2-E.

Maximum Emissions are the emissions at maximum capacity and prior to (in the absence of) pollution control, or any other emission reduction. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) & Toxic Air Pollutants (TAPs) in Table 2-I. Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

[illegible]

Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.7.4 NMAC) and Title V (20.2.70 NMAC).

Table 2-E: Requested Allowable Emissions

Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "--" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E⁻⁴).

[illegible]

1 Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.7.4 NMAC) and Title V (20.2.7.0 NMAC).

² **Footnote added by applicant:** With the changes to MACT ZZZZ, unit AUX-A1 is no longer an insignificant activity. However, it is not subject to any emission limitations under MACT ZZZZ or permitting under 20.2.72 NMAC. Therefore, no emission limits are presented in this application.

Table 2-F: Additional Emissions during Startup, Shutdown, and Routine Maintenance (SSM)

☐ This table is intentionally left blank since all emissions at this facility due to routine or predictable startup, shutdown, or scheduled maintenance are no higher than those listed in Table 2-E and a malfunction emission limit is not already permitted or requested. If you are required to report GHG emissions as described in Section 6a, include any GHG emissions during Startup, Shutdown, and/or Scheduled Maintenance (SSM) in Table 2-P. Provide an explanations of SSM emissions in Section 6 and 6a.

All applications for facilities that have emissions during routine or predictable startup, shutdown or scheduled maintenance (SSM)¹, including NOI applications, must include in this table the Maximum Emissions during routine or predictable startup, shutdown and scheduled maintenance (20.2.7 NMAC, 20.2.72-203.A.3 NMAC, 20.2.73-200.D.2 NMAC). In Section 6 and 6a, provide emissions calculations for all SSM emissions reported in this table. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (https://www.env.nm.gov/aqb/permit/aqb_pol.html) for more detailed instructions. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

[illegible]

¹ For instance, if the short term steady-state Table 2-E emissions are 5 lb/hr and the SSM rate is 12 lb/hr, enter 7 lb/hr in this table. If the annual steady-state Table 2-E emissions are 21.9 TPY, and the number of scheduled SSM events result in annual emissions of 31.9 TPY, enter 10.0 TPY in the table below.

² **Condensable Particulate Matter:** Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

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

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-I: 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		Provide Pollutant Name Here □ HAP or □ TAP		Provide Pollutant Name Here □ HAP or □ TAP		Provide Pollutant Name Here □ HAP or □ TAP		Provide Pollutant Name Here □ HAP or □ TAP		Provide Pollutant Name Here □ HAP 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
S-001	A-1	0.52	2.3	0.22	0.95	0.21	0.93						
S-002	A-2	0.52	2.3	0.22	0.95	0.21	0.93						
AUX-A1 ¹	AUX-A1 ¹	**	**	**	**	**	**						
N/A	F-001	0.0071	0.03	-	-	-	-						
N/A	SSM/M1	*	0.069	-	-	-	-						
Totals:		1.05	4.70	0.44	1.90	0.42	1.86						

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

[illegible]

Table 2-L: Tank Data

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-L.2. Note: 1.00 bbl = 10.159 M3 = 42.0 gal

[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-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.

Unit No.	GWPs ¹	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
A-1	mass GHG	28368.3	0.054	0.54	22,800	footnote 3										28368.9	
	CO ₂ e	28368.3	16.1	13.5													28397.9
A-2	mass GHG	28368.3	0.054	0.54												28368.9	
	CO ₂ e	28368.3	16.1	13.5													28397.9
F-001	mass GHG	-	-	119.2												119.2	
	CO ₂ e	-	-	2980													2980.0
SSM/M 1	mass GHG	10	-	450												460.0	
	CO ₂ e	10	-	11250													11260.0
	mass GHG																
	CO ₂ e																
	mass GHG																
	CO ₂ e																
	mass GHG																
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	CO ₂ e																
Total	mass GHG	56746.6	0.11	570.3												57317.0	
	CO ₂ e	56746.6	32.18	14257.0													71035.8

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.

This application is being submitted for the renewal of Operating Permit P134-R4 for Belen Compressor Station. The facility is owned and operated by El Paso Natural Gas Company, LLC (EPNG), a Kinder Morgan company. This submittal is pursuant to 20.2.70.300.B.(2) NMAC, which requires a Title V renewal application be submitted at least twelve months prior to expiration of the current permit. Title V Permit P134-R4 expires on November 1, 2025.

The facility compresses natural gas for transportation purposes. Equipment at this facility includes two General Electric Company M3572R regenerative cycle turbines (Unit IDs: A-1, A-2) and a CAT G3406 auxiliary emergency generator (Unit ID: AUX-A1). Other regulated emission sources include fugitive emissions (F-001) and startup, shutdown, and routine maintenance (Unit ID: SSM/M1). Insignificant activities include ten storage tanks (Unit IDs: T-001 to T-010) used to store lube oil, used oil and coolant.

Belen Compressor Station is a Title V major facility. The facility is also an existing PSD major source that is grandfathered from PSD permitting and the facility has not undergone a major modification. There will be no change to the status of the facility under these rules with this renewal. The facility will also remain a minor source of hazardous air pollutants (HAPs).

There have been no physical or operational changes at this facility since the issuance of the previous Title V Operating Permit.

Additionally, Belen recently became subject to the Ozone Precursor rule under 20.2.50 NMAC to reduce ozone precursor emissions. EPNG elected to comply with the emission standards through an Alternative Compliance Plan (ACP) and an Alternate Emission Standard (AES), both of which have been conditionally approved by the department. The ACP and AES address CO and NOx emissions from all subject units in the Kinder Morgan fleet. This includes the units at Belen CS.

The ACP addresses CO in all subject units and NOx emissions from units not addressed in the separately submitted plan for NOx that comply with 20.2.50.113 NMAC through an Alternative Emission Standards, pursuant to 20.2.50.113(B)(11) NMAC.

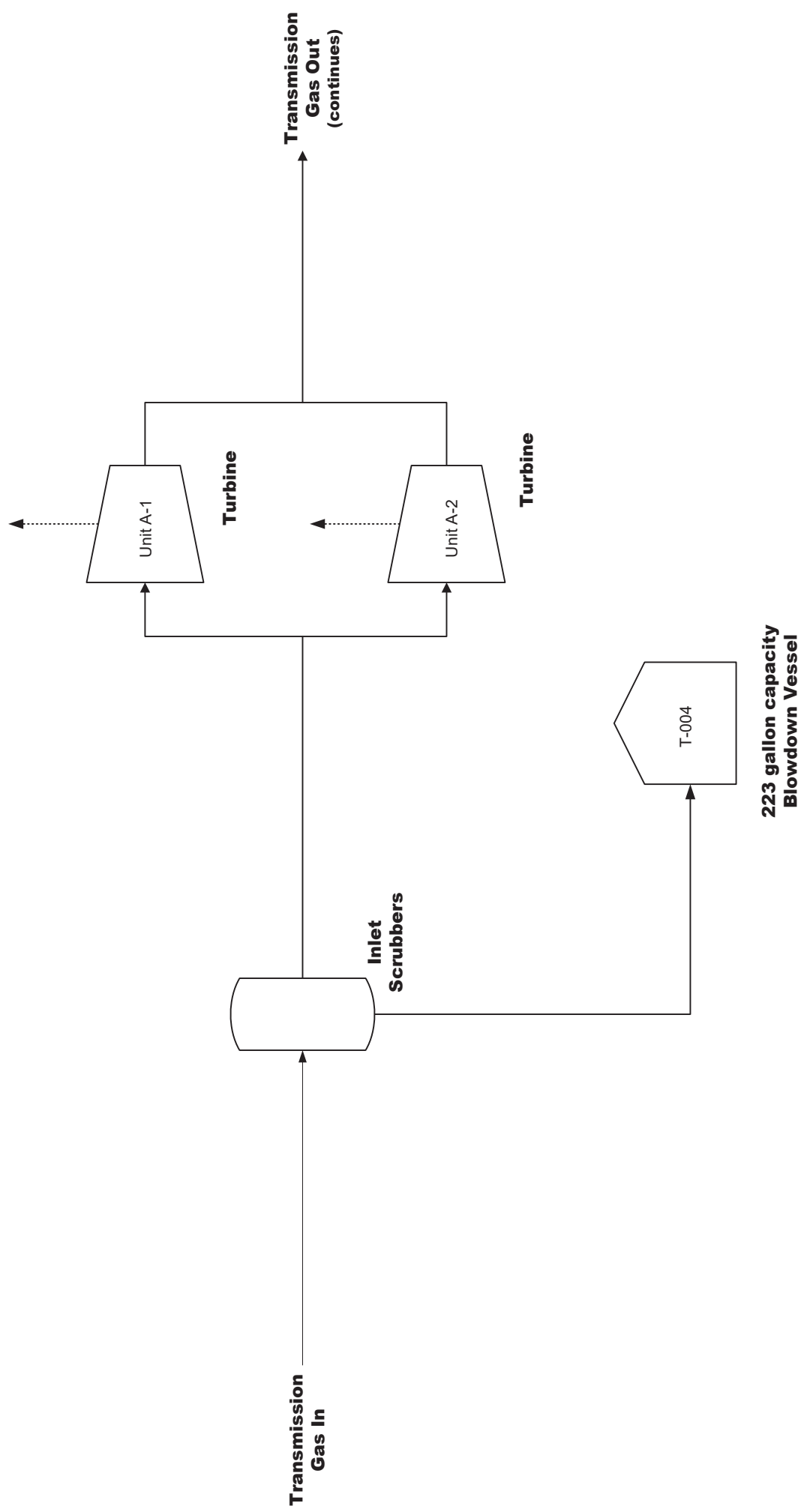
Per an agreement with the NMED Air Permitting staff, EPNG will be submitting its NSR revision application for Belen by January 2025. Once the NSR is issued, the changes will be incorporated into the Title V permit within 12-months of the change. Belen Compressor Station is currently permitted under Operating Permit P134-R4 (November 1, 2020) and NSR Permit 3262-M1 (issued December 29, 2014).

Section 4

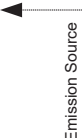
Process Flow Sheet

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.



Legend


Emission Source

Process Flow Diagram
Belen 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 for the facility is attached.

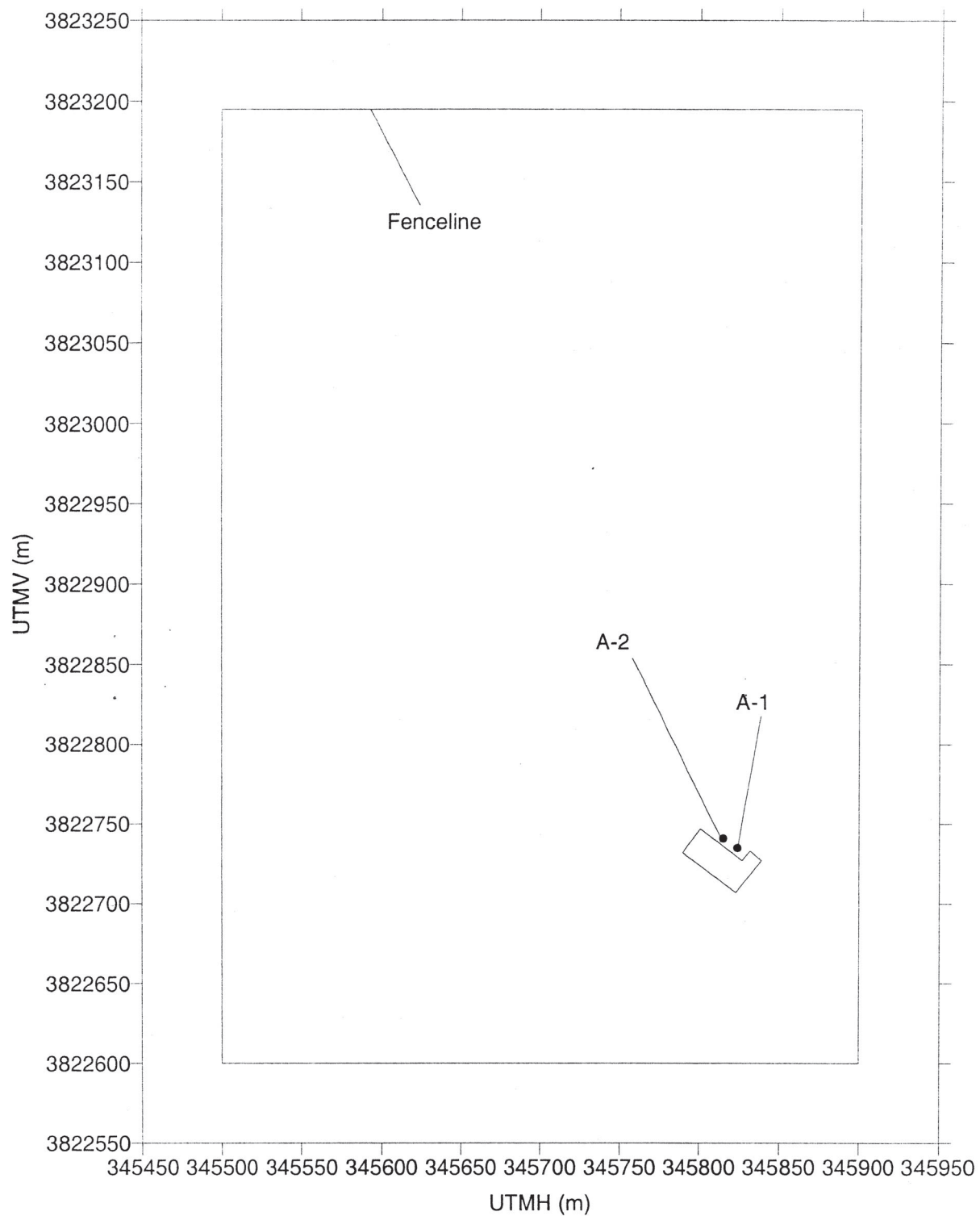


Figure B-1
Belen Compressor Station
Site Layout

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 Belen Compressor Station include the following:

- Two GE M3572 regenerative cycle turbines
- One CAT G3406 auxiliary backup generator
- Facility-wide fugitive emissions
- Startup, Shutdown, and Maintenance emissions

The basis for calculating the emissions for these units is discussed here.

Turbines (A-1 and A-2)

The emission rates for NO_x, CO and VOCs were calculated using testing data. The testing data was taken from various GE M3572R turbines and used to create an emission factor. The SO₂ emission rate was calculated using a maximum sulfur content in the fuel of 5grains/100scf. HAP emissions were calculated using GRI-HAPCalc 3.01. The ISO horsepower was used for these calculations, instead of the site-rated horsepower. This provides a 20% safety factor on the emission rates.

Greenhouse gas emission rates were calculated using the emission factors (in kg/MMBtu) from Tables C-1 and C-2 in 40 CFR 98 Subpart C and the heat input rate of the turbines (in Btu/hp-hr)

Fugitives (F-001)

The fugitive emissions for the facility were calculated using the 1993 Protocol for Equipment Leak Emission Estimates (EPA-453/R-93-026). The emission rates using these factors provide a total organic carbon (TOC) emission rate. A representative gas analysis was used to calculate the VOC emission rate. Since the available gas analysis for the facility does not include a breakdown of HAP constituents, GRI-HAPCalc was used to determine the fugitive HAP emission rate. A 100% safety factor was used on the HAP emission rate as a conservative measure.

Greenhouse gas emissions were calculated by multiplying the TOC emission rate by the ratio of methane to TOC in the representative gas analysis. This value was multiplied by the global warming potential of methane to calculate the emission rate in CO₂e.

Startup, Shutdown, Maintenance and Malfunction (SSM/M1)

Unit Blowdown

The attached spreadsheet shows the estimated VOC emissions per unit blowdown event, as well as the estimated annual blowdown emissions based on an estimated annual volume for a particular calendar year and a typical gas analysis. Please note, however, that the annual estimate includes both unit blowdowns and station blowdowns (which are discussed later). This annual estimate is intended to show a typical annual emission rate, and does not represent the facility's potential-to-emit (PTE).

Turbine Starting Gas

The starting gas volume for these units is measured. The amount of starting gas varies widely based on the duration of the startup sequence. As a very conservative estimate in the attached calculation spreadsheet, a volume of 150 Mscf of starting gas per startup event was assumed. On this basis, the estimated VOC emissions per startup event are 135 lb/event.

The annual emissions estimates in the spreadsheet are based on the measured volumes for a particular calendar year. Again, this annual estimate is intended to show a typical annual emission rate, and does not represent the facility's PTE.

Station Blowdown

The attached spreadsheet shows the estimated emissions of volatile organic compounds (VOC) per station blowdown event. The annual emissions related to station blowdown are included as described above for unit blowdowns.

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)

Belen Compressor Station

Criteria Pollutant Emission Summary

Unit	NO _x (pph)	NO _x (tpy)	CO (pph)	CO (tpy)	VOC (pph)	VOC (tpy)	SO ₂ (pph)	SO ₂ (tpy)	TSP (pph)	TSP (tpy)	PM ₁₀ (pph)	PM ₁₀ (tpy)	PM _{2.5} (pph)	PM _{2.5} (tpy)	H2S (pph)	H2S (tpy)
A-1	38.6	169.0	7.9	34.7	0.25	1.1	0.35	1.5	0.37	1.6	0.37	1.6	0.37	1.6	-	-
A-2	38.6	169.0	7.9	34.7	0.25	1.1	0.35	1.5	0.37	1.6	0.37	1.6	0.37	1.6	-	-
F-001	-	-	-	-	1.0	4.5	-	-	-	-	-	-	-	-	-	-
SSM/MM1	-	-	-	-	*	10.0	-	-	-	-	-	-	-	-	-	-
Totals	77.2	338.0	15.8	69.4	1.5	16.7	0.71	3.1	0.73	3.2	0.73	3.2	0.73	3.2	0.199	0.0036

HAP and GHG Emission Summary

Unit	Acetaldehyde (pph)	Acetaldehyde (tpy)	HCOH (pph)	HCOH (tpy)	Total HAPs (pph)	Total HAPs (tpy)	GHGs (tons/yr CO ₂ e)
A-1	0.22	0.95	0.21	0.93	0.52	2.3	28397.6
A-2	0.22	0.95	0.21	0.93	0.52	2.3	28397.6
F-001	-	-	-	-	0.0071	0.031	2981.1
SSM/MM1	-	-	-	-	*	0.069	11260.0
Totals	0.4	1.9	0.4	1.9	1.1	4.7	71036.4

Belen Compressor Station

Units:		A-1, A-2	
Description:		GE Regenerative Cycle Turbines	
ISO Rating:	5700	hp	
Site Rating:	4737	hp	
Fuel Heating Value:	931.9	Btu/scf	
Heat Input Rate:	9721	Btu/hp-hr	or
	0.009721	MMBtu/hp-hr	
Criteria Pollutant Emission Calculations			
	NO _x	CO	VOC
			SO ₂ ¹
			Acetaldehyde ²
			Formaldehyde ²
			Total HAPs ²
			TSP ^{4,5}
			PM ₁₀
			PM _{2.5}
			lb/MMBtu
EF	38.6	7.9	0.13
	169.0	34.7	0.55
			100%
	38.6	7.9	0.25
	169.0	34.7	1.1
			0.35
			0.22
			0.21
			0.52
			0.37
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¹ SO₂ emission rate based on sulfur content of 5gr S/100scf

² HAP tpy emission rate from GRI-HAPCalc 3.01 with 20% safety factor (using ISO hp instead of derate hp);

HAP emissions exceed VOC emissions as a result of conservative HAP emission factors and the 20% safety factor, instead of using testing data

³ For criteria pollutants; testing data and regression analysis included in this application

⁴ All PM lb/hr Emission Rate = EF (lb/MMBtu) * Fuel Consumption (MMBtu/hp-hr) * hp (ISO Rating value)

From lb/hr, tpy Emission Rate = lb/hr * Yearly Operating Hours * 1ton/2000lb

⁵ EF of all PM from AP42 3.1 table 3.1-2a: Emission Factors for Criteria Pollutants and Greenhouse Gases from Stationary Gas Turbines

GHG Emission Calculations

	CO ₂	CH ₄	N ₂ O	
EF	53.02	1.00E-03	1.00E-04	kg/MMBtu 40 CFR 98, Subpart C, Tables C-1 and C-2
	6476.8	0.12	0.012	lb/hr
	28368.304	0.54	0.054	tons/yr
	28368.304	13.4	15.9	tons/yr CO ₂ e

El Paso Natural Gas Company, LLC

Belen Compressor Station

Unit: F-001
Description: Facility-wide fugitives

Max. hours of operation per year:	8,760	hr/yr		
Emission Source:	Number**	Emission Factor*** (kg/hr/source) (lb/hr/source)	Product: (lb/hr)	
Valves:	486	0.0200	0.04409	21.429
Relief Valves	9	0.1880	0.41446	3.730
Open-Ended Lines:	23	0.0220	0.04850	1.116
Compressor Seals:	4	0.2040	0.44974	1.799
Pump Seals (Liq. Service):	0	0.0630	0.13889	0.000
Flanges & Connections:	986	0.0011	0.00243	2.391
Total # of Components:	1,508	Total Emissions Factor:		30.464 (lb/hr)
Total Fugitive Emissions Factor:		30.464 lb/hr		
Wt. fraction of non-methane, non-ethane HC / THC:		3.35%		
Wt. fraction of methane / THC:		89.367%		
Fugitive VOCs:		1.02 lb/hr		
Fugitive VOCs:		4.47 tpy		
Fugitive CH ₄ :		119.2 tpy (mass basis)		
Fugitive CH ₄ :		2981.1 tpy CO ₂ e		

Fugitive VOC Calculation:

30.4640 LB/HR THC X 0.0335 wt. fraction NMNEHC/THC = 1.0205 LB/HR fugitive VOCs

1.0200 LB/HR X 8760 HRS/YR / 2000 LB/TON = 4.4676 TPY

**number based on EPNG representative component count per process unit multiplied by the number of process units

*** based on EPA-453/R-93-026 (Table 2-3: Gas Plant Average Emission Factors - Total Organic Compounds, TOC)

Fugitive HAP emissions (from GRI-HAPCalc):

HAP	lb/hr	tpy
Benzene	0.0011	0.0049
Toluene	0.0019	0.0082
Ethylbenzene	0.00009	0.0004
Xylenes	0.00048	0.0021
Total	0.00356	0.0156
Safety Factor	100%	100%
Totals (w/SF)	0.0071	0.0312

HAPCalc Inputs:

Combined Valves and PRVs into "Valves"--> 432 valves
693 connectors (speciated based on ratio in HAPCalc defaults)
113 flanges (speciated based on ratio in HAPCalc defaults)
Compressor seals entered under "Other"

FACILITY EQUIPMENT:

REFERENCE COMPONENTS (EL PASO STATION)	per turbine:	per engine:	per aux. unit:	per scrubber:	per CT bay:	
Valves (per unit):	212	25	6	14	8	
Relief Valves (per unit):	4	2	1	0	1	
Open-Ended Lines (per unit):	6	1	3	2	1	
Compressor Seals (per unit):	2	See Below	0	0	0	
Pump Seals (Liq. Service) (per unit):	0	0	0	0	0	
Flanges & Connections (per unit):	403	143	28	38	16	

	# turbines:	# engines:	# aux. units:	# scrubbers:	# CT bays:	TOTAL:
FACILITY INPUT=>	2	0	1	4	0	
Valves:	424	0	6	56	0	486
Relief Valves	8	0	1	0	0	9
Open-Ended Lines:	12	0	3	8	0	23
Compressor Seals:	4	0	0	0	0	4
Pump Seals (Liq. Service):	0	0	0	0	0	0
Flanges & Connections:	806	0	28	152	0	986

	# engines w/ 1 CYL:	# engines w/ 2 CYL:	# engines w/ 3 CYL:	# engines w/ 4 CYL:	# engines w/ 5 CYL:	TOTAL # Engine Compressor Seals:
ENGINE Compressor Seals ESTIMATION=>	0	0	0	0	0	0

Unit: SSM/M1
Description: Facility-wide SSM emissions

Gas Analysis (Typical)

VOC weight %:	2.00%	Nominal
CO2 weight %:	2.00%	Nominal
CH4 weight %:	90.00%	Nominal
H2S Content:	0.25 gr H ₂ S/100 scf	Nominal (Maximum allowed in pipeline quality natural
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

Turbine Blowdown Venting (BD-Unit)

SSM Emission Rates, Per Event

Event Description:	Planned Maintenance and Normal Shutdown	
Volume per event:	44 Mscf/event	Estimated (varies)
VOC Emissions:	39.5 lb/event	lb/scf * scf/event * VOC wt %
H2S emissions:	0.016 lb/event	gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume:	4400 Mscf/yr	Expected blowdown volume
VOC Emissions:	2.0 tons/yr	lb/scf * scf/event * VOC wt % * ton/2000 lb
H2S emissions:	0.00079 tons/yr	gr/scf * scf/event * 1lb/7000gr * ton/2000 lb

Turbine Starting Gas (BD-Unit)

SSM Emission Rates, Per Event

Event Description:	Normal Startup	
Volume per event:	150 Mscf/event	Estimated (varies)
VOC Emissions:	135 lb/event	lb/scf * scf/event * VOC wt %
H2S emissions:	0.054 lb/event	gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume:	15000 Mscf/yr	Expected blowdown volume
VOC Emissions:	6.7 tons/yr	lb/scf * scf/event * VOC wt %
H2S emissions:	0.00268 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:	558 Mscf/event	Estimated (varies)
VOC Emissions:	501 lb/event	lb/scf * scf/event * VOC wt %
H2S emissions:	0.199 lb/event	gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume:	558 Mscf/yr	Assumes 1 event per year
VOC Emissions:	0.25 tons/yr	lb/event * event/year * ton/2000lb
H2S emissions:	0.00010 tons/yr	gr/scf * scf/event * 1lb/7000gr * ton/2000 lb

Facility Blowdown Total

VOC Emissions:	10.0 tons/yr	
HAP emissions:	0.069 tons/yr	Assumes same HAP/VOC ratio as fugitives
H2S emissions:	0.0036 tons/yr	
CO2 Emissions:	10.0 tons/yr	VOC Emissions / %VOC * %CO2
CH4 Emissions:	450.0 tons/yr	VOC Emissions / %VOC * %CH4
CO2e Emissions:	11260.0 tons/yr	

SSM/M1 Emissions

Facility-Wide SSM/M Total

VOC	HAP	H2S	CO2	CH4	CO2e	
10.0	0.069	0.0036	10.0	450.0	11260.0	tons/yr

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.
-

Turbines

- GRI-HAPCalc Output
- 40 CFR 98 Subpart C, Tables C-1 and C-2
- Testing data
- Facility Gas Analysis

Fugitives

- 1993 Protocol for Equipment Leak Emission Estimates
- GRI-HAPCalc Output
- Facility Gas Analysis

GRI-HAPCalc® 3.01
Turbine Report

Facility ID:	KMI BELEN	Notes:
Operation Type:	COMPRESSOR STATION	
Facility Name:	BELEN 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".*

Turbine Unit

Unit Name: A-1

Hours of Operation: 8,760 Yearly
Rate Power: 5700 hp
Fuel Type: NATURAL GAS
Emission Factor Set: FIELD > EPA > 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>
<u>HAPs</u>			
PAHs	0.0005	0.00000970 g/bhp-hr	EPA
Formaldehyde	0.9314	0.01693680 g/bhp-hr	GRI Field
Acetaldehyde	0.9533	0.01733570 g/bhp-hr	GRI Field
1,3-Butadiene	0.0034	0.00006160 g/bhp-hr	GRI Field
Acrolein	0.0143	0.00026000 g/bhp-hr	GRI Field
Propional	0.0476	0.00086500 g/bhp-hr	GRI Field
Propylene Oxide	0.0070	0.00012730 g/bhp-hr	EPA
Benzene	0.0296	0.00053840 g/bhp-hr	GRI Field
Toluene	0.0226	0.00041100 g/bhp-hr	GRI Field
Ethylbenzene	0.0077	0.00014050 g/bhp-hr	EPA
Xylenes(m,p,o)	0.0684	0.00124410 g/bhp-hr	GRI Field
2,2,4-Trimethylpentane	0.0883	0.00160530 g/bhp-hr	GRI Field
n-Hexane	0.0828	0.00150580 g/bhp-hr	GRI Field
Phenol	0.0061	0.00011010 g/bhp-hr	GRI Field
Naphthalene	0.0004	0.00000760 g/bhp-hr	GRI Field
2-Methylnaphthalene	0.0001	0.00000130 g/bhp-hr	GRI Field
Biphenyl	0.0182	0.00033050 g/bhp-hr	GRI Field
Phenanthrene	0.0000	0.00000050 g/bhp-hr	GRI Field
Chrysene	0.0001	0.00000100 g/bhp-hr	GRI Field
Beryllium	0.0000	0.00000010 g/bhp-hr	GRI Field
Phosphorus	0.0036	0.00006520 g/bhp-hr	GRI Field
Chromium	0.0005	0.00000820 g/bhp-hr	GRI Field
Manganese	0.0010	0.00001750 g/bhp-hr	GRI Field
Nickel	0.0003	0.00000610 g/bhp-hr	GRI Field
Cobalt	0.0001	0.00000160 g/bhp-hr	GRI Field

Arsenic	0.0000	0.00000060 g/bhp-hr	GRI Field
Selenium	0.0000	0.00000030 g/bhp-hr	GRI Field
Cadmium	0.0000	0.00000020 g/bhp-hr	GRI Field
Mercury	0.0001	0.00000270 g/bhp-hr	GRI Field
Lead	0.0002	0.00000340 g/bhp-hr	GRI Field

Total 2.2876

Criteria Pollutants

PM	1.5932	0.02897200 g/bhp-hr	EPA
CO	115.9371	2.10828420 g/bhp-hr	GRI Field
NMHC	10.6616	0.19387800 g/bhp-hr	GRI Field
NMEHC	0.5069	0.00921840 g/bhp-hr	EPA
NOx	68.8579	1.25216290 g/bhp-hr	GRI Field
SO2	0.0565	0.00102720 g/bhp-hr	GRI Field

Other Pollutants

Methane	54.2869	0.98719230 g/bhp-hr	GRI Field
Acetylene	0.3940	0.00716540 g/bhp-hr	GRI Field
Ethylene	0.7674	0.01395450 g/bhp-hr	GRI Field
Ethane	8.2533	0.15008370 g/bhp-hr	GRI Field
Propane	0.8799	0.01600000 g/bhp-hr	GRI Field
Isobutane	0.2640	0.00480000 g/bhp-hr	GRI Field
Butane	0.2860	0.00520000 g/bhp-hr	GRI Field
Cyclopentane	0.0908	0.00165110 g/bhp-hr	GRI Field
Butyrald/Isobutyraldehyde	0.0737	0.00134000 g/bhp-hr	GRI Field
n-Pentane	4.4625	0.08115000 g/bhp-hr	GRI Field
Cyclohexane	0.3368	0.00612400 g/bhp-hr	GRI Field
Methylcyclohexane	0.4856	0.00883120 g/bhp-hr	GRI Field
n-Octane	0.1754	0.00318890 g/bhp-hr	GRI Field
1,3,5-Trimethylbenzene	0.1650	0.00300000 g/bhp-hr	GRI Field
n-Nonane	0.0293	0.00053260 g/bhp-hr	GRI Field
CO2	26,553.3800	482.86607780 g/bhp-hr	EPA
Vanadium	0.0000	0.00000070 g/bhp-hr	GRI Field
Copper	0.0011	0.00002050 g/bhp-hr	GRI Field
Molybdenum	0.0011	0.00002030 g/bhp-hr	GRI Field
Barium	0.0013	0.00002290 g/bhp-hr	GRI Field

Unit Name: A-2

Hours of Operation: 8,760 Yearly
Rate Power: 5700 hp
Fuel Type: NATURAL GAS
Emission Factor Set: FIELD > EPA > 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			
PAHs	0.0005	0.00000970 g/bhp-hr	EPA
Formaldehyde	0.9314	0.01693680 g/bhp-hr	GRI Field
Acetaldehyde	0.9533	0.01733570 g/bhp-hr	GRI Field
1,3-Butadiene	0.0034	0.00006160 g/bhp-hr	GRI Field
Acrolein	0.0143	0.00026000 g/bhp-hr	GRI Field

Propional	0.0476	0.00086500 g/bhp-hr	GRI Field
Propylene Oxide	0.0070	0.00012730 g/bhp-hr	EPA
Benzene	0.0296	0.00053840 g/bhp-hr	GRI Field
Toluene	0.0226	0.00041100 g/bhp-hr	GRI Field
Ethylbenzene	0.0077	0.00014050 g/bhp-hr	EPA
Xylenes(m,p,o)	0.0684	0.00124410 g/bhp-hr	GRI Field
2,2,4-Trimethylpentane	0.0883	0.00160530 g/bhp-hr	GRI Field
n-Hexane	0.0828	0.00150580 g/bhp-hr	GRI Field
Phenol	0.0061	0.00011010 g/bhp-hr	GRI Field
Naphthalene	0.0004	0.00000760 g/bhp-hr	GRI Field
2-Methylnaphthalene	0.0001	0.00000130 g/bhp-hr	GRI Field
Biphenyl	0.0182	0.00033050 g/bhp-hr	GRI Field
Phenanthrene	0.0000	0.00000050 g/bhp-hr	GRI Field
Chrysene	0.0001	0.00000100 g/bhp-hr	GRI Field
Beryllium	0.0000	0.00000010 g/bhp-hr	GRI Field
Phosphorus	0.0036	0.00006520 g/bhp-hr	GRI Field
Chromium	0.0005	0.00000820 g/bhp-hr	GRI Field
Manganese	0.0010	0.00001750 g/bhp-hr	GRI Field
Nickel	0.0003	0.00000610 g/bhp-hr	GRI Field
Cobalt	0.0001	0.00000160 g/bhp-hr	GRI Field
Arsenic	0.0000	0.00000060 g/bhp-hr	GRI Field
Selenium	0.0000	0.00000030 g/bhp-hr	GRI Field
Cadmium	0.0000	0.00000020 g/bhp-hr	GRI Field
Mercury	0.0001	0.00000270 g/bhp-hr	GRI Field
Lead	0.0002	0.00000340 g/bhp-hr	GRI Field
Total	2.2876		

Criteria Pollutants

PM	1.5932	0.02897200 g/bhp-hr	EPA
CO	115.9371	2.10828420 g/bhp-hr	GRI Field
NMHC	10.6616	0.19387800 g/bhp-hr	GRI Field
NMEHC	0.5069	0.00921840 g/bhp-hr	EPA
NOx	68.8579	1.25216290 g/bhp-hr	GRI Field
SO2	0.0565	0.00102720 g/bhp-hr	GRI Field

Other Pollutants

Methane	54.2869	0.98719230 g/bhp-hr	GRI Field
Acetylene	0.3940	0.00716540 g/bhp-hr	GRI Field
Ethylene	0.7674	0.01395450 g/bhp-hr	GRI Field
Ethane	8.2533	0.15008370 g/bhp-hr	GRI Field
Propane	0.8799	0.01600000 g/bhp-hr	GRI Field
Isobutane	0.2640	0.00480000 g/bhp-hr	GRI Field
Butane	0.2860	0.00520000 g/bhp-hr	GRI Field
Cyclopentane	0.0908	0.00165110 g/bhp-hr	GRI Field
Butyrald/Isobutyraldehyde	0.0737	0.00134000 g/bhp-hr	GRI Field
n-Pentane	4.4625	0.08115000 g/bhp-hr	GRI Field
Cyclohexane	0.3368	0.00612400 g/bhp-hr	GRI Field
Methylcyclohexane	0.4856	0.00883120 g/bhp-hr	GRI Field
n-Octane	0.1754	0.00318890 g/bhp-hr	GRI Field
1,3,5-Trimethylbenzene	0.1650	0.00300000 g/bhp-hr	GRI Field
n-Nonane	0.0293	0.00053260 g/bhp-hr	GRI Field
CO2	26,553.3800	482.86607780 g/bhp-hr	EPA
Vanadium	0.0000	0.00000070 g/bhp-hr	GRI Field

Copper	0.0011	0.00002050 g/bhp-hr	GRI Field
Molybdenum	0.0011	0.00002030 g/bhp-hr	GRI Field
Barium	0.0013	0.00002290 g/bhp-hr	GRI Field

GRI-HAPCalc® 3.01
Fugitive Emissions Report

Facility ID: KMI BELEN
Operation Type: COMPRESSOR STATION
Facility Name: BELEN 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".*

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:	693	0	0
Flanges	113	0	0
Open-Ended Lines:	12	0	0
Pumps:	0	0	0
Valves:	432	0	0
Others:	4	0	0

Calculated Emissions (ton/yr)

<u>Chemical Name</u>	<u>Emissions</u>
<u>HAPs</u>	
Benzene	0.0049
Toluene	0.0082
Ethylbenzene	0.0004
Xylenes(m,p,o)	0.0021
Total	0.0156

Criteria Pollutants

NMHC	1.6913
NMEHC	0.7399

98.36(e)(3)

Within 30 days of receipt of a written request from the Administrator, you shall submit explanations of the following:

98.36(e)(3)(i)

An explanation of how company records are used to quantify fuel consumption, if the Tier 1 or Tier 2 Calculation Methodology is used to calculate CO₂ emissions.

98.36(e)(3)(ii)

An explanation of how company records are used to quantify fuel consumption, if solid fuel is combusted and the Tier 3 Calculation Methodology is used to calculate CO₂ emissions.

98.36(e)(3)(iii)

An explanation of how sorbent usage is quantified.

98.36(e)(3)(iv)

An explanation of how company records are used to quantify fossil fuel consumption in units that uses CEMS to quantify CO₂ emissions and combusts both fossil fuel and biomass.

98.36(e)(3)(v)

An explanation of how company records are used to measure steam production, when it is used to calculate CO₂ mass emissions under §98.33(a)(2)(iii) or to quantify solid fuel usage under §98.33(c)(3).

98.36(e)(4)

Within 30 days of receipt of a written request from the Administrator, you shall submit the verification data and information described in paragraphs (e)(2)(iii), (e)(2)(v), and (e)(2)(vii) of this section.

[Amended at 75 FR page 79151, Dec. 17, 2010]

§ 98.37 Records that must be retained.

In addition to the requirements of §98.3(g), you must retain the applicable records specified in §§98.34(f) and (g), 98.35(b), and 98.36(e).

§ 98.38 Definitions.

All terms used in this subpart have the same meaning given in the Clean Air Act and subpart A of this part.

Table C-1 to Subpart C of Part 98 —Default CO₂ Emission Factors and High Heat Values for Various Types of Fuel

Fuel type	Default high heat value	Default CO₂ emission factor
Coal and coke	mmBtu/short ton	kg CO ₂ /mmBtu
Anthracite	25.09	103.54
Bituminous	24.93	93.40
Subbituminous	17.25	97.02
Lignite	14.21	96.36
Coke	24.80	102.04
Mixed (Commercial sector)	21.39	95.26
Mixed (Industrial coking)	26.28	93.65
Mixed (Industrial sector)	22.35	93.91
Mixed (Electric Power sector)	19.73	94.38
Natural gas	mmBtu/scf	kg CO ₂ /mmBtu
(Weighted U.S. Average)	1.028 x 10 ⁻³	53.02
Petroleum products	mmBtu/gallon	kg CO ₂ /mmBtu
Distillate Fuel Oil No. 1	0.139	73.25
Distillate Fuel Oil No. 2	0.138	73.96

Distillate Fuel Oil No. 4	0.146	75.04
Residual Fuel Oil No. 5	0.140	72.93
Residual Fuel Oil No. 6	0.150	75.10
Used Oil	0.135	74.00
Kerosene	0.135	75.20
Liquefied petroleum gases (LPG)	0.092	62.98
Propane	0.091	61.46
Propylene	0.091	65.95
Ethane	0.069	62.64
Ethanol	0.084	68.44
Ethylene	0.100	67.43
Isobutane	0.097	64.91
Isobutylene	0.103	67.74
Butane	0.101	65.15
Butylene	0.103	67.73
Naphtha (<401 deg F)	0.125	68.02
Natural Gasoline	0.110	66.83
Other Oil (>401 deg F)	0.139	76.22
Pentanes Plus	0.110	70.02
Petrochemical Feedstocks	0.129	70.97
Petroleum Coke	0.143	102.41
Special Naphtha	0.125	72.34
Unfinished Oils	0.139	74.49
Heavy Gas Oils	0.148	74.92
Lubricants	0.144	74.27
Motor Gasoline	0.125	70.22
Aviation Gasoline	0.120	69.25
Kerosene-Type Jet Fuel	0.135	72.22
Asphalt and Road Oil	0.158	75.36
Crude Oil	0.138	74.49
Other fuels-solid.	mmBtu/short ton	kg CO ₂ /mmBtu
Municipal Solid Waste	9.95 1	90.7
Tires	26.87	85.97
Plastics	38.00	75.00
Petroleum Coke	30.00	102.41
Other fuels (gaseous)	mmBtu/scf	kg CO ₂ /mmBtu
Blast Furnace Gas	0.092 x 10 ⁻³	274.32
Coke Oven Gas	0.599 x 10 ⁻³	46.85
Propane Gas	2.516 x 10 ⁻³	61.46
Fuel Gas 2	1.388 x 10 ⁻³	59.00
Biomass fuels—solid	mmBtu/short ton	kg CO ₂ /mmBtu
Wood and Wood Residuals	15.38	93.80
Agricultural Byproducts	8.25	118.17
Peat	8.00	111.84
Solid Byproducts	25.83	105.51
Biomass fuels—gaseous	mmBtu/scf	kg CO ₂ /mmBtu
Biogas (Captured methane)	0.841 x 10 ⁻³	52.07
Biomass Fuels—Liquid	mmBtu/gallon	kg CO ₂ /mmBtu
Ethanol	0.084	68.44
Biodiesel	0.128	73.84

Rendered Animal Fat	0.125	71.06
Vegetable Oil	0.120	81.55

¹ Use of this default HHV is allowed only for: (a) Units that combust MSW, do not generate steam, and are allowed to use Tier 1; (b) units that derive no more than 10 percent of their annual heat input from MSW and/or tires; and (c) small batch incinerators that combust no more than 1,000 tons of MSW per year.

² Reporters subject to subpart X of this part that are complying with § 98.243(d) or subpart Y of this part may only use the default HHV and the default CO₂ emission factor for fuel gas combustion under the conditions prescribed in § 98.243(d)(2)(i) and (d)(2)(ii) and § 98.252(a)(1) and (a)(2), respectively. Otherwise, reporters subject to subpart X or subpart Y shall use either Tier 3 (Equation C-5) or Tier 4.

Table C-2 to Subpart C of Part 98 —Default CH₄ and N₂O Emission Factors for Various Types of Fuel

Default CH₄ and N₂O Emission Factors for Various Types of Fuel

Fuel type	Default CH₄ emission factor (kg CH₄/mmBtu)	Default N₂O emission factor (kg N₂O/mmBtu)
Coal and Coke (All fuel types in Table C-1)	1.1 x 10 ⁻⁰²	1.6 x 10 ⁻⁰³
Natural Gas	1.0 x 10 ⁻⁰³	1.0 x 10 ⁻⁰⁴
Petroleum (All fuel types in Table C-1)	3.0 x 10 ⁻⁰³	6.0 x 10 ⁻⁰⁴
Municipal Solid Waste	3.2 x 10 ⁻⁰²	4.2 x 10 ⁻⁰³
Tires	3.2 x 10 ⁻⁰²	4.2 x 10 ⁻⁰³
Blast Furnace Gas	2.2 x 10 ⁻⁰⁵	1.0 x 10 ⁻⁰⁴
Coke Oven Gas	4.8 x 10 ⁻⁰⁴	1.0 x 10 ⁻⁰⁴
Biomass Fuels—Solid (All fuel types in Table C-1)	3.2 x 10 ⁻⁰²	4.2 x 10 ⁻⁰³
Biogas	3.2 x 10 ⁻⁰³	6.3 x 10 ⁻⁰⁴
Biomass Fuels—Liquid (All fuel types in Table C-1)	1.1 x 10 ⁻⁰³	1.1 x 10 ⁻⁰⁴

Note: Those employing this table are assumed to fall under the IPCC definitions of the “Energy Industry” or “Manufacturing Industries and Construction”. In all fuels except for coal the values for these two categories are identical. For coal combustion, those who fall within the IPCC “Energy Industry” category may employ a value of 1g of CH₄/mmBtu.

[75 FR page 79154, Dec. 17, 2010]

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United States
Environmental Protection
Agency

Office of Air Quality
Planning and Standards
Research Triangle Park NC 27711

EPA-453/R-93-026
JUNE 1993

AIR



Protocol for Equipment Leak Emission Estimates

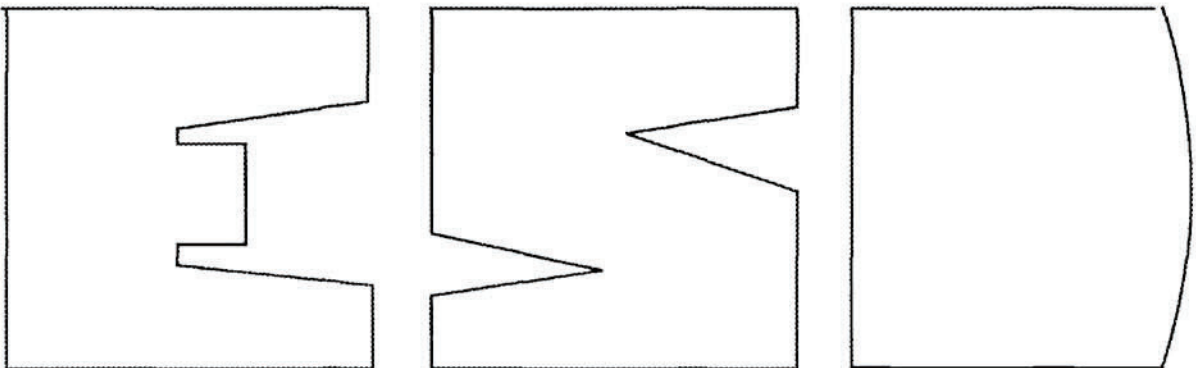


TABLE 2-3. GAS PLANT AVERAGE EMISSION FACTORS^a

Equipment type	Service	Emission factor ^b (kg/hr/source)
Valves	All	0.020
Pump seals ^c	Liquid	0.063
Compressor seals	All	0.204
Pressure relief valves	All	0.188
Connectors	All	0.0011
Open-ended lines	All	0.022

^aSource: Reference 3.

^bThese factors are for total organic compound emission rates.

^cThe pump seal factor can be used to estimate the leak rate from agitator seals.

El Paso Natural Gas Company, LLC							
Belen Compressor Station							
Facility Data		Source Data					
Name	Source ID	Model	Type	CO g/hour	THC g/hour		
Bowie	A-1	GE	Turbine	0.13	0.59		
Bowie	A-1	GE	Turbine	0.09	0.19		
Caprock	A-1	GE	Turbine	3.30	0.05		
Caprock	A-2	GE	Turbine	3.77	0.11		
Caprock	A-2	GE	Turbine	1.44	0.04		
Caprock	A-1	GE	Turbine	1.32	0.02		
Caprock	A-2	GE	Turbine	0.57	0.02		
Caprock	A-1	GE	Turbine	0.45	0.03		
Cornudas	A-3	GE	Turbine	1.23	0.27		
Cornudas	A-3	GE	Turbine	0.70	0.18		
Cornudas	A-3	GE	Turbine	0.29	0.07		
Dillon	B-1	GE	Turbine	0.00	NA		
El Paso	C-1	GE	Turbine	0.39	0.21		
El Paso	C-1	GE	Turbine	0.18	0.33		
Gallup	B-1	GE	Turbine	0.68	NA		
Gallup	B-1	GE	Turbine	0.20	NA		
Gallup	B-1	GE	Turbine	0.08	NA		
Gallup	B-1	GE	Turbine	0.20	NA		
Gallup	B-1	GE	Turbine	0.02	NA		
Gallup	B-1	GE	Turbine	0.15	NA		
Gallup	B-1	GE	Turbine	0.14	NA		
Gallup	B-1	GE	Turbine	0.05	NA		
Hackberry	A-2	GE	Turbine	0.05	NA		
Hackberry	A-2	GE	Turbine	0.05	NA		
Hackberry	A-2	GE	Turbine	0.05	NA		
Hackberry	A-1	GE	Turbine	NA	NA		
Hackberry	A-1	GE	Turbine	NA	NA		
Hackberry	A-1	GE	Turbine	NA	NA		
Leupp	C-1	GE	Turbine	NA	NA		
Leupp	C-1	GE	Turbine	0.44	0.12		
Leupp	C-1	GE	Turbine	0.12	0.05		
Lincoln	B-1	GE	Turbine	0.11	0.04		
Lincoln	B-1	GE	Turbine	0.24	0.05		
Lincoln	B-1	GE	Turbine	0.17	0.05		
Lincoln	B-1	GE	Turbine	0.17	0.04		
Lincoln	B-1	GE	Turbine	0.00	0.01		
Lincoln	B-1	GE	Turbine	0.00	0.01		
Lincoln	B-1	GE	Turbine	0.00	0.01		
Lincoln	B-1	GE	Turbine	0.00	0.01		
Lincoln	B-1	GE	Turbine	0.00	0.01		
Lincoln	B-1	GE	Turbine	0.00	0.01		
Lincoln	B-1	GE	Turbine	0.00	0.01		
Lincoln	B-1	GE	Turbine	0.00	0.01		
Lincoln	B-1	GE	Turbine	0.00	0.01		
San Simon	A-1	GE	Turbine	0.67	1.73		
San Simon	A-3	GE	Turbine	0.78	0.50		
San Simon	A-1	GE	Turbine	0.49	0.82		
San Simon	A-3	GE	Turbine	1.13	0.39		
San Simon	A-3	GE	Turbine	0.94	0.30		
San Simon	A-2	GE	Turbine	0.40	0.22		
San Simon	A-1	GE	Turbine	0.41	0.78		
Seligman	A-1	GE	Turbine	NA	NA		
Seligman	A-1	GE	Turbine	NA	NA		
Seligman	A-1	GE	Turbine	NA	NA		
Vail	A-2	GE	Turbine	1.48	0.03		
Vail	A-1	GE	Turbine	1.05	0.02		
Vail	A-3	GE	Turbine	1.23	0.03		
Vail	A-1	GE	Turbine	0.58	0.03		
Vail	A-3	GE	Turbine	0.62	0.02		
Vail	A-2	GE	Turbine	0.75	0.01		
Vail	A-2	GE	Turbine	0.55	0.02		
Vail	A-1	GE	Turbine	0.37	0.01		
Vail	A-3	GE	Turbine	0.41	0.01		
Wenden	A-1	GE	Turbine	0.12	0.02		
Wenden	A-1	GE	Turbine	0.02	0.02		
Wenden	A-1	GE	Turbine	0.10	0.02		
Wenden	A-1	GE	Turbine	0.06	NA		
Wenden	A-1	GE	Turbine	0.07	NA		

ENGINE SPEED (rpm):	1800	RATING STRATEGY:	STANDARD
COMPRESSION RATIO:	10.3	APPLICATION:	GAS COMPRESSION
JACKET WATER OUTLET (°C):	99	RATING LEVEL:	CONTINUOUS
ASPIRATION:	NA	FUEL:	NATURAL GAS
COOLING SYSTEM:	JW+OC	FUEL SYSTEM:	LPG IMPCO
CONTROL SYSTEM:	CDIS	FUEL PRESSURE RANGE(kPag): (See note 1)	10-34
EXHAUST MANIFOLD:	WC	FUEL METHANE NUMBER:	80
COMBUSTION:	STANDARD SETTING	FUEL LHV (MJ/Nm3):	35.64
EXHAUST OXYGEN (% O2):	2.0	ALTITUDE CAPABILITY AT 25°C INLET AIR TEMP. (m):	152

RATING	NOTES	LOAD	100%	75%	50%
ENGINE POWER (WITHOUT FAN)	2	bkW	160	120	80
ENGINE EFFICIENCY (ISO 3046/1)	3	%	32.4	30.3	26.4
ENGINE EFFICIENCY (NOMINAL)	3	%	32.4	30.3	26.4

ENGINE DATA						
FUEL CONSUMPTION (ISO 3046/1)	4	MJ/bkW-hr	11.10	11.87	13.63	
FUEL CONSUMPTION (NOMINAL)	4	MJ/bkW-hr	11.10	11.87	13.63	
AIR FLOW (0°C, 101.3 kPa) (WET)	5, 6	Nm3/bkW-hr	3.32	3.63	3.67	
AIR FLOW (WET)	5, 6	kg/bkW-hr	4.29	4.69	4.74	
FUEL FLOW (0°C, 101.3 kPa)		Nm3/hr	50	40	31	
INLET MAN. PRESSURE	7	kPa(abs)	90	79	62	
INLET MAN. TEMPERATURE (MEASURED IN PLENUM)	8	°C	33	33	33	
TIMING	9	°BTDC	25	25	25	
EXHAUST TEMPERATURE - ENGINE OUTLET	10	°C	560	535	555	
EXHAUST GAS FLOW (0 °C, 101.3 kPa) (WET)	11, 6	Nm3/bkW-hr	3.64	3.97	4.06	
EXHAUST GAS MASS FLOW (WET)	11, 6	kg/bkW-hr	4.53	4.94	5.03	

EMISSIONS DATA - ENGINE OUT						
NOx (as NO2) (corr. to 5% O2)	12,13	mg/Nm3 DRY	10427	7063	6734	
CO (corr. to 5% O2)	12,14	mg/Nm3 DRY	524	489	536	
THC (mol. wt. of 15.84) (corr. to 5% O2)	12,14	mg/Nm3 DRY	663	489	504	
NMHC (mol. wt. of 15.84) (corr. to 5% O2)	12,14	mg/Nm3 DRY	99	73	76	
NMNEHC (VOCs) (mol. wt. of 15.84) (corr. to 5% O2)	12,14,15	mg/Nm3 DRY	66	49	50	
HCHO (Formaldehyde) (corr. to 5% O2)	12,14	mg/Nm3 DRY	101	88	85	
CO2 (corr. to 5% O2)	12,14	g/Nm3 DRY	191	178	197	
EXHAUST OXYGEN	12,16	% DRY	2.0	1.1	0.3	
LAMBDA	12,16		1.12	1.14	1.01	

ENERGY BALANCE DATA						
LHV INPUT	17	kW	493	396	304	
HEAT REJECTION TO JACKET WATER (JW)	18,23	kW	160	138	121	
HEAT REJECTION TO ATMOSPHERE	19	kW	20	16	12	
HEAT REJECTION TO LUBE OIL (OC)	20,23	kW	26	23	20	
HEAT REJECTION TO EXHAUST (LHV TO 25°C)	21,22	kW	128	99	71	
HEAT REJECTION TO EXHAUST (LHV TO 177°C)	21	kW	90	69	50	

CONDITIONS AND DEFINITIONS

Engine rating obtained and presented in accordance with ISO 3046/1. (Standard reference conditions of 25°C, 100 kPa barometric pressure.) No overload permitted at rating shown. Consult the altitude deration factor chart for applications that exceed the rated altitude or temperature.

Emission levels are at engine exhaust flange prior to any after treatment. Values are based on engine operating at steady state conditions and corrected to 5 % exhaust oxygen. Tolerances specified are dependent upon fuel quality. Fuel methane number cannot vary more than ± 3 . Part load data may require engine adjustment.

For notes information consult page three.

FUEL USAGE GUIDE

CAT METHANE NUMBER	<8	8	10	15	20	25	30	35	40	45	50	55	60	65	70	75	80	100
SET POINT TIMING	-	15	15	15	15	15	15	16	17	18	19	20	21	22	23	24	25	25
DERATION FACTOR	0	0.56	0.60	0.70	0.80	0.90	1	1	1	1	1	1	1	1	1	1	1	1

ALTITUDE DERATION FACTORS AT RATED SPEED

INLET AIR TEMP °C	50	0.94	0.91	0.88	0.86	0.83	0.80	0.78	0.75	0.73	0.71	0.68	0.66	0.64
	45	0.95	0.93	0.90	0.87	0.84	0.82	0.79	0.77	0.74	0.72	0.69	0.67	0.65
	40	0.97	0.94	0.91	0.88	0.86	0.83	0.80	0.78	0.75	0.73	0.71	0.68	0.66
	35	0.99	0.96	0.93	0.90	0.87	0.84	0.82	0.79	0.77	0.74	0.72	0.69	0.67
	30	1	0.97	0.94	0.91	0.88	0.86	0.83	0.80	0.78	0.75	0.73	0.71	0.68
	25	1	0.99	0.96	0.93	0.90	0.87	0.84	0.82	0.79	0.77	0.74	0.72	0.69
	20	1	1	0.97	0.94	0.92	0.89	0.86	0.83	0.81	0.78	0.75	0.73	0.71
	15	1	1	0.99	0.96	0.93	0.90	0.87	0.85	0.82	0.79	0.77	0.74	0.72
	10	1	1	1	0.98	0.95	0.92	0.89	0.86	0.83	0.81	0.78	0.76	0.73
		0	250	500	750	1000	1250	1500	1750	2000	2250	2500	2750	3000
ALTITUDE (METERS ABOVE SEA LEVEL)														

MINIMUM SPEED CAPABILITY AT THE RATED SPEED'S
SITE TORQUE (RPM)

INLET AIR TEMP °C	50	1000	1000	1020	1060	1090	1120	1160	1200	1240	1280	1320	1360	1410
	45	1000	1000	1010	1040	1070	1110	1140	1180	1220	1260	1300	1340	1390
	40	1000	1000	1000	1020	1060	1090	1120	1160	1200	1240	1280	1320	1370
	35	1000	1000	1000	1010	1040	1070	1110	1140	1180	1220	1260	1300	1350
	30	1000	1000	1000	1000	1020	1060	1090	1120	1160	1200	1240	1280	1320
	25	1000	1000	1000	1000	1000	1040	1070	1110	1140	1180	1220	1260	1300
	20	1000	1000	1000	1000	1000	1020	1050	1090	1120	1160	1200	1240	1280
	15	1000	1000	1000	1000	1000	1000	1030	1070	1100	1140	1180	1220	1260
	10	1000	1000	1000	1000	1000	1000	1020	1050	1080	1120	1160	1200	1240
		0	250	500	750	1000	1250	1500	1750	2000	2250	2500	2750	3000
ALTITUDE (METERS ABOVE SEA LEVEL)														

FUEL USAGE GUIDE:

This table shows the derate factor and full load set point timing required for a given fuel. Note that deration and set point timing adjustment may be required as the methane number decreases. Methane number is a scale to measure detonation characteristics of various fuels. The methane number of a fuel is determined by using the Caterpillar methane number calculation.

ALTITUDE DERATION FACTORS:

This table shows the deration required for various air inlet temperatures and altitudes. Use this information along with the fuel usage guide chart to help determine actual engine power for your site. The derate factors shown do not take into account external cooling system capacity. The derate factors provided assume the external cooling system can maintain the specified cooling water temperatures, at site conditions.

ACTUAL ENGINE RATING:

To determine the actual rating of the engine at site conditions, one must consider separately, limitations due to fuel characteristics and air system limitations. The Fuel Usage Guide deration establishes fuel limitations. The Altitude/Temperature deration factor and RPC (reference the Caterpillar Methane Program) are added together to establish air system limitations. To determine the actual power available, take the lowest rating between 1) and 2).

1) Fuel Usage Guide Deration

2) $1 - ((1 - \text{Altitude/Temperature Deration}) + (1 - \text{RPC}))$

MINIMUM SPEED CAPABILITY AT THE RATED SPEED'S SITE TORQUE (RPM):

This table shows the minimum allowable engine turndown speed where the engine will maintain the Rated Speed's Torque for the given ambient conditions.

NOTES:

1. Fuel pressure range specified is to the engine fuel pressure regulator. Additional fuel train components should be considered in pressure and flow calculations.
2. Engine rating is with one engine driven jacket water pump. Tolerance is $\pm 3\%$ of full load.
3. ISO 3046/1 engine efficiency tolerance is $(+0, -)5\%$ of full load % efficiency value. Nominal engine efficiency tolerance is $\pm 5.0\%$ of full load % efficiency value.
4. ISO 3046/1 fuel consumption tolerance is $(+5, -)0\%$ of full load data. Nominal fuel consumption tolerance is $\pm 5.0\%$ of full load data.
5. Air flow value is on a 'wet' basis. Flow is a nominal value with a tolerance of $\pm 5\%$.
6. Inlet and Exhaust Restrictions must not exceed A&I limits based on full load flow rates from the standard technical data sheet.
7. Inlet manifold pressure is a nominal value with a tolerance of $\pm 5\%$.
8. Inlet manifold temperature is a nominal value with a tolerance of $\pm 5^\circ\text{C}$.
9. Timing indicated is for use with the minimum fuel methane number specified. Consult the appropriate fuel usage guide for timing at other methane numbers.
10. Exhaust temperature is a nominal value with a tolerance of $(+)35^\circ\text{C}$, $(-)30^\circ\text{C}$.
11. Exhaust flow value is on a 'wet' basis. Flow is a nominal value with a tolerance of $\pm 6\%$.
12. Emissions data is at engine exhaust flange prior to any after treatment.
13. NOx values are the maximum values expected under steady state conditions.
14. CO, CO₂, THC, NMHC, NMNEHC, and HCHO values are "Not to Exceed" levels. THC, NMHC, and NMNEHC do not include aldehydes.
15. VOCs - Volatile organic compounds as defined in US EPA 40 CFR 60, subpart JJJJ
16. Exhaust Oxygen tolerance is ± 0.5 .
17. LHV rate tolerance is $\pm 5.0\%$.
18. Heat rejection to jacket water value displayed includes heat to jacket water alone. Value is based on treated water. Tolerance is $\pm 10\%$ of full load data.
19. Heat rejection to atmosphere based on treated water. Tolerance is $\pm 50\%$ of full load data.
20. Lube oil heat rate based on treated water. Tolerance is $\pm 20\%$ of full load data.
21. Exhaust heat rate based on treated water. Tolerance is $\pm 10\%$ of full load data.
22. Heat rejection to exhaust (LHV to 25°C) value shown includes unburned fuel and is not intended to be used for sizing or recovery calculations.
23. Total Jacket Water Circuit heat rejection is calculated as: $(\text{JW} \times 1.1) + (\text{OC} \times 1.2)$. Heat exchanger sizing criterion is maximum circuit heat rejection at site conditions, with applied tolerances. A cooling system safety factor may be multiplied by the total circuit heat rejection to provide additional margin.

FREE FIELD MECHANICAL & EXHAUST NOISE

SOUND PRESSURE LEVEL (dB)											
Octave Band Center Frequency (OBCF)											
100% Load Data			dB(A)	63 Hz	125 Hz	250 Hz	500 Hz	1 kHz	2 kHz	4 kHz	8 kHz
Mechanical Sound	Distance from the Engine (m)	1.0	94	73.8	79.3	82.8	88.8	89.8	87.3	84.3	81.3
		7.0	84	68.5	72.5	76.5	77.5	80.5	77.5	73.5	68.9
		15.0	78	66.4	77.4	71.4	66.9	74.4	71.9	67.9	62.4
Exhaust Sound	Distance from the Engine (m)	1.5	107	105.7	107.7	105.7	97.7	100.7	101.2	98.7	95.6
		7.0	93.7	92.1	94.6	87.6	83.1	85.6	87.1	88.1	84.2
		15.0	87	86.8	89.8	84.3	77.3	79.3	79.8	81.3	76.3

SOUND PARAMETER DEFINITION:

Data Variability Statement:
Sound data presented by Caterpillar has been measured in accordance with ISO 6798 in a Grade 3 test environment. Measurements made in accordance with ISO 6798 will result in some amount of uncertainty. The uncertainties depend not only on the accuracies with which sound pressure levels and measurement surface areas are determined, but also on the 'near-field error' which increases for smaller measurement distances and lower frequencies. The uncertainty for a Grade 3 test environment, that has a source that produces sounds that are uniformly distributed in frequency over the frequency range of interest, is equal to 4 dB (A-weighted). This uncertainty is expressed as the largest value of the standard deviation.

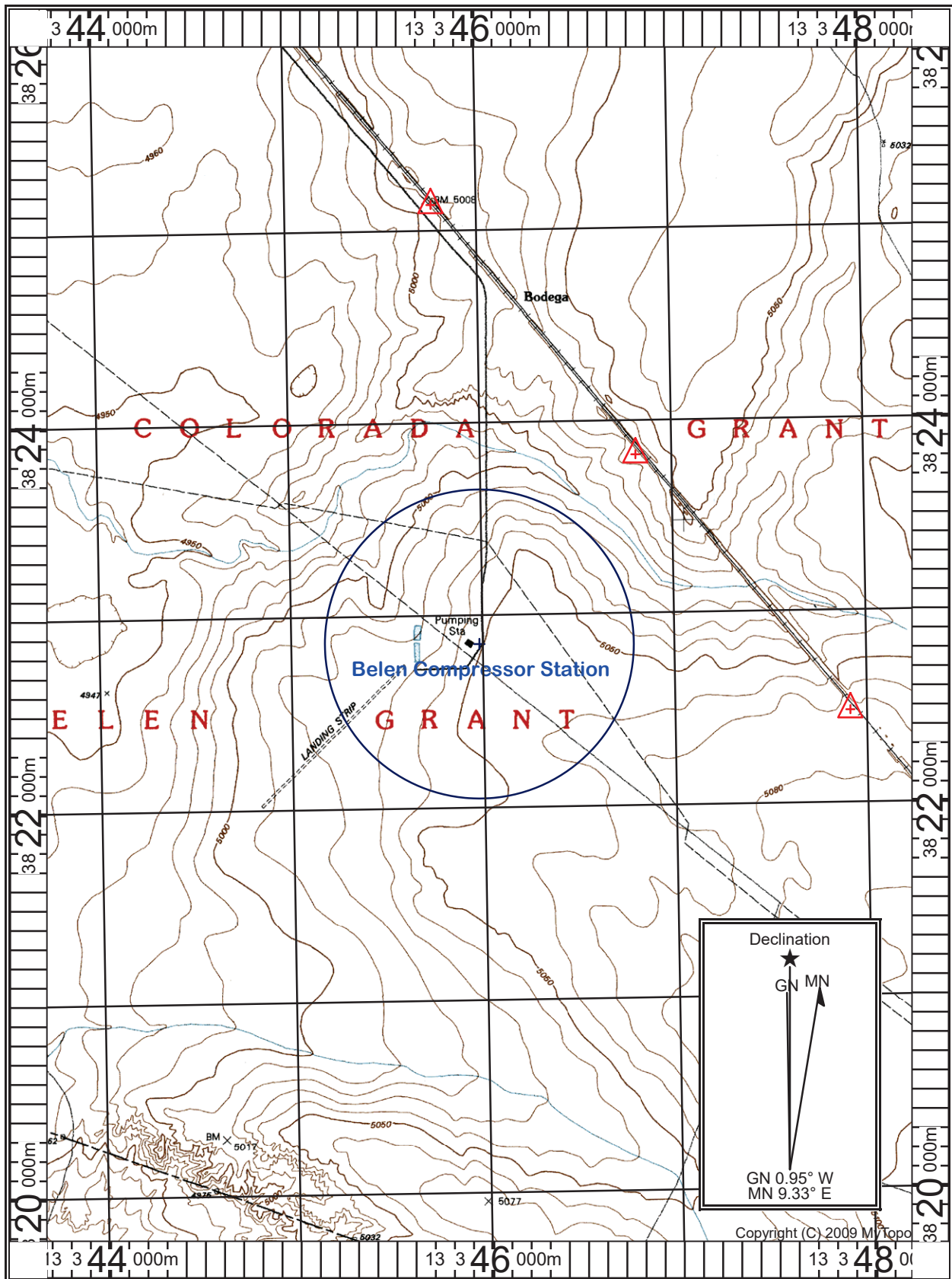
Section 8

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 of the facility is attached.



Map Name: TURN (NM)
Print Date: 10/17/24

Scale: 1 inch = 2,500 ft.
Map Center: 13 0345981 E 3822849 N

Horizontal Datum: WGS84

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.
-

N/A—This application is a Title V renewal application and is being submitted under 20.2.70 NMAC

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.

Belen Compressor Station is a natural gas compressor station that compresses natural gas and delivers the compressed gas to a pipeline for mainline transportation. This facility consists primarily of two General Electric Company M3572R regenerative cycle turbines (Unit IDs: A-1 & A-2), powering the compressors. The facility is designed to compress and transport approximately 800 MMSCF per day of pipeline quality natural gas. An auxiliary emergency generator (Unit ID: AUX-A1) is maintained at the facility to provide electric power in the event that service from the local utility is interrupted. Operation of AUX-A1 is limited to 500 hours per year.

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. NO_x: **XX.X** TPY
 - b. CO: **XX.X** TPY
 - c. VOC: **XX.X** TPY
 - d. SO_x: **XX.X** TPY
 - e. PM: **XX.X** TPY
 - f. PM₁₀: **XX.X** TPY
 - g. PM_{2.5}: **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—There are no modifications associated with this project.

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/>

Table for State Regulations:

<u>State Regulation Citation</u>	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	No	N/A	20.2.3 NMAC is a State Implementation Plan (SIP) approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. This regulation does not apply to the facility because of the exemption in 20.2.3.9 NMAC, which states that the requirements of 20.2.3 NMAC are not applicable requirements under 20.2.70 NMAC.	
20.2.7 NMAC	Excess Emissions	Yes	Facility	This regulation establishes requirements for the facility if operations at the facility result in any excess emissions. The owner or operator will operate the source at the facility having an excess emission, to the extent practicable, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. The facility will also notify the NMED of any excess emission per 20.2.7.110 NMAC. 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	N/A	Facility	This facility does not process, handle, transport, or store “bult material” as defined in 20.2.23.108.A NMAC. This regulation does not apply as this is a Title V Renewal and not a NOI.	
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	Belen Compressor Station does not have any existing gas burning equipment with a heat input of greater than 1,000,000 MMBtu/yr. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.33.108 NMAC.	
20.2.34 NMAC	Oil Burning Equipment: NO ₂	No	N/A	This facility does not have any oil burning equipment with a heat input of greater than 1,000,000 MMBtu/yr. The facility is not subject to this regulation and does not have emission sources that meet the applicability requirements under 20.2.34.108 NMAC.	
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This regulation establishes sulfur emission standards for natural gas processing plants. This facility does not meet the definition of a “natural gas processing plant”, as defined in 20.2.35.7 NMAC.	
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. Any equipment subject to 20.2.37 NMAC before the repeal, would now be subject to 20.2.61 NMAC.	
20.2.38 NMAC	Hydrocarbon Storage Facility	No	N/A	This facility is not a tank battery operating in conjunction with a petroleum production or processing facility, as defined in 20.2.38.7 NMAC.	
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This regulation establishes sulfur emission standards for sulfur recovery plants which are not part of petroleum or natural gas processing facilities. Belen Compressor Station is not a sulfur recovery plant, therefore this regulation does not apply.	
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants			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- Units A-1, A-2, and AUX-A1 are existing units and EPNG will comply with all applicable requirements of this rule and have submitted and ACP. A summary of this ACP is explained in Section 3 of this application. 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.

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.)	
				☒ 113 – Engines and Turbines ☐ 114 – Compressor Seals ☐ 115 – Control Devices and Closed Vent Systems ☒ 116 – Equipment Leaks and Fugitive Emissions ☐ 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	115—N/A—There are no Flares, ECDs, Thermal Oxidizers, or Vapor Recovery Units at this facility. 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 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-1, A-2, AUX-1	This regulation establishes controls on smoke and visible emissions from certain sources, including stationary combustion equipment. Units A-1, a-2, and AUX-A1 are stationary combustion equipment which comply by using pipeline quality natural gas.	
20.2.70 NMAC	Operating Permits	Yes	Facility	This regulation establishes requirements for obtaining an operating permit. Belen Compressor Station is a Title V major source and is therefore subject to this NMAC.	

<u>State Regulation Citation</u>	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.)
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This regulation establishes a schedule of operating permit emission fees. The facility is subject to 20.2.70 NMAC and is therefore subject to requirements of this regulation.
20.2.72 NMAC	Construction Permits	Yes	Facility	This regulation establishes the requirements for obtaining a construction permit. This facility is subject to 20.2.72 NMAC and has been issued NSR Permit 3262-M1.
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	This regulation establishes emission inventory requirements. The facility meets the applicability requirements of 20.2.73.300 NMAC. This facility will meet all applicable reporting requirements under 20.2.73.300.B.1 NMAC.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	Yes	Facility	This regulation establishes requirements for obtaining a prevention of significant deterioration permit. Belen Compressor Station is an existing PSD major source that is grandfathered from PSD permitting and the facility has not undergone a major modification.
20.2.75 NMAC	Construction Permit Fees	No	Facility	This regulation establishes a schedule of operating permit emission fees. The facility is subject to 20.2.71 NMAC (Operating Permit Emission Fees) and, therefore, is not subject to the requirements of this regulation, per 20.2.75.11.E. In the event of an NSR permit action, EPNG would be required to pay the appropriate filing and review fees.
20.2.77 NMAC	New Source Performance	No	N/A	This regulation establishes state authority to implement new source performance standards (NSPS) for stationary sources under 40 CFR Part 60. Belen Compressor Station does not have any units subject to a NSPS. Accordingly, this regulation does not apply.
20.2.78 NMAC	Emission Standards for HAPS	Yes (potentially)	Facility (potentially)	This regulation establishes state authority to implement emission standards for hazardous air pollutants subject to 40 CFR Part 61. This facility does not emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61 and is therefore not subject to this regulation. This facility could potentially emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61. In the case of asbestos demolition, one NESHAP would apply.
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	This regulation establishes the requirements for obtaining a nonattainment area permit. This facility is not located in a non-attainment area and therefore is not subject to this regulation.
20.2.80 NMAC	Stack Heights	No	N/A	This regulation establishes requirements for the evaluation of stack heights and other dispersion techniques. The units with emissions routed to a stack were constructed before December 31, 1970, and therefore are not subject to this regulation (20.2.80.110.A).
20.2.82 NMAC	MACT Standards for source categories of HAPS	Yes	AUX-A1	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63 (MACT standards). MACT ZZZZ defines national emissions standards for HAPs for stationary reciprocating Internal Combustion Engines. Unit AUX-A1 is an existing (constructed before 6/12/2006) auxiliary reciprocating engine for the backup generator located at an area source of HAPs. The unit is subject to the operation and maintenance requirements of the subpart. Units A-1 and A-2 are not subject to any MACT standards.

Table for Applicable Federal Regulations:

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 50	NAAQS	Yes	Facility	This regulation defines national ambient air quality standards. Belen Compressor Station meets all applicable national ambient air quality standards for PM10, PM2.5, SO2, H2S, CO, and NOx under this regulation.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
NSPS 40 CFR 60, Subpart A	General Provisions	No	N/A	This regulation defines general provisions for relevant standards that have been set under this part. The facility is not subject to this regulation because no NSPS Subparts apply.
NSPS 40 CFR60.40a, Subpart Da	Subpart Da, Performance Standards for Electric Utility Steam Generating Units	No	N/A	This regulation establishes standards of performance for electric utility steam generating units. This facility does not operate any electric utility steam generating units therefore, this regulation does not apply.
NSPS 40 CFR60.40b Subpart Db	Electric Utility Steam Generating Units	No	N/A	This regulation establishes standards of performance for industrial-commercial-institutional steam generating units. This facility does not operate any industrial-commercial-institutional steam generating units therefore this regulation does not apply.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	This regulation establishes standards of performance for industrial-commercial-institutional steam generating units. This facility does not operate any industrial-commercial-institutional steam generating units therefore this regulation does not apply.
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 regulation establishes performance standards for storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. The capacities for the tanks at the facility are less than 40,000 gallons and are not 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 have any tanks with a storage capacity equal to or greater than 75 cubic meters used to store volatile organic liquids (VOL) for which the construction, reconstruction, or modification of commenced after July 23, 1984.
NSPS 40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No	N/A	The General Electric regenerative cycle turbines at Belen Compressor Station were constructed prior to October 1977. Accordingly, these units are not subject to this subpart.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from Onshore Gas Plants	No	N/A	This regulation defines standards of performance for equipment leaks of VOC emissions from onshore natural gas processing plants for which construction, reconstruction, or modification commenced after January 20, 1984, and on or

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
				before August 23, 2011. This facility is not a gas plant therefore this regulation does not apply.
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions	No	N/A	This regulation establishes standards of performance for SO ₂ emissions from onshore natural gas processing for which construction, reconstruction, or modification of the amine sweetening unit commenced after January 20, 1984 and on or before August 23, 2011. This facility is not a gas plant therefore this regulation does not apply.
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	This regulation establishes standards of performance for crude oil and natural gas production, transmission, and distribution. This facility does not have any affected units that have been constructed, modified, or reconstructed on or after August 23, 2011.
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	This regulation establishes standards of performance for crude oil and natural gas production, transmission, and distribution. This facility does not have any affected units that have been constructed, modified, or reconstructed on or after September 18, 2015.
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary compression ignition combustion engines. This facility does not operate any stationary compression ignition combustion engines; therefore, this subpart does not apply.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary spark ignition combustion engines. AUX-AI is a stationary SI ICE which was constructed prior to June 12, 2006; therefore, this regulation does not apply.
NSPS 40 CFR Part 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines	No	N/A	This regulation establishes standards of performance for stationary combustion turbines. The Belen Compressor Station turbines units A-1 and A-2 were constructed prior to February 18, 2005. These turbines have not been modified or reconstructed since February 18, 2005. Accordingly, these units are not subject to this subpart.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for	No	N/A	This regulation establishes standards of performance for electric generating units. This facility does not operate any electric generating units therefore this subpart doesn't apply.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	Electric Generating Units			
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	This regulation establishes standards of performance for electric utility generating units. This facility does not operate any electric utility generating units therefore this regulation does apply.
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	These regulations establish standards of performance for municipal solid waste landfills. This facility is not a municipal solid waste landfill therefore this regulation does not apply.
NESHAP 40 CFR 61 Subpart A	General Provisions	Yes (potentially)	Facility (potentially)	Belen Compressor Station does not emit or have threshold quantities of regulated substances at the facility and/or the facility is not involved in the triggering activity. Subpart M could potentially apply and is discussed below.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for Mercury	No	N/A	This regulation establishes a national emission standard for mercury. The facility does not have stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide and increase or dry wastewater treatment plant sludge. This facility is not subject to this regulation.
NESHAP 40 CFR 61 Subpart M	National Emission Standards for Asbestos	Yes (potentially)	Facility (potentially)	This standard does not apply to the facility under normal operating conditions; however, in the case of asbestos demolition, Subpart M would apply.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	No	N/A	This regulation establishes national emissions standards for equipment leaks (fugitive emission sources). The facility does not have equipment that operates in volatile hazardous air pollutant (VHAP) service. The regulated activities subject to this regulation do not take place at this facility. The facility is not subject to this regulation.
MACT 40 CFR 63, Subpart A	General Provisions	Yes	AUX-A1	This regulation defines general provisions for relevant standards that have been set under this part. Unit AUX-A1 is subject to MACT ZZZZ.
MACT 40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	No	N/A	This regulation establishes national emission standards for hazardous air pollutants from oil and natural gas production facilities. This facility is not an Oil or Natural Gas Production Facility, as defined by this regulation therefore it is not subject to this regulation.
MACT 40 CFR 63 Subpart HHH		No	N/A	This facility is not a major source of HAPS, nor does it contain an affected unit. As stated in 63.1270(c), a facility that does not contain an affected source is not subject to the requirements of this subpart.
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional	No	N/A	This regulation establishes national emission and operating limitations for HAP emissions from stationary combustion turbines located at major sources of HAPs. This facility is not a major source of HAPs and, therefore, units A-1 and A-2 are not subject to this subpart.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	Boilers & Process Heaters			
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No	N/A	These regulations establish standards of performance for coal and oil fire electric utility steam generating units. This facility does not operate any coal or oil fire electric utility steam generating units therefore this subpart does not apply.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	AUX-A1	This regulation defines national emissions standards for HAPs for stationary reciprocating Internal Combustion Engines. Unit AUX-A1 is an existing auxiliary reciprocating engine for the backup generator located at an area source of HAPs. This unit was constructed before June 12, 2006, and is subject to the operation and maintenance requirements of this subpart.
40 CFR 64	Compliance Assurance Monitoring	No	N/A	This regulation defines compliance assurance monitoring. Belen Compressor Station is a Title V major source. However, none of the units at the facility are required to use a control device to achieve compliance with an emission limit, therefore this regulation does not apply.
40 CFR 68	Chemical Accident Prevention	No	N/A	This facility is regulated under DOT Office of Pipeline Safety Regulations; therefore, it is not subject to this regulation. This regulation arises from section 112® of the Clean Air Act and establishes threshold based on inventoried quantities of specific substances in process. As established at 40 CFR 68.3, the term “stationary source” 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 part establishes the acid rain program. This facility is not a source of acid rain.
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions	No	N/A	This regulation establishes sulfur dioxide allowance emissions for certain types of facilities. This subpart does not apply
Title IV-Acid Rain 40 CFR 75	Continuous Emissions Monitoring	No	N/A	This regulation applies to each effected unit subject to Acid Rain Emissions limitations or reduction requirements for SO ₂ or NO _x .
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program	No	N/A	This regulation establishes an acid rain nitrogen oxides emission reduction program. This regulation applies to each coal-fired utility unit that is subject to an acid rain emissions limitation or reduction requirement for SO ₂ . This facility does not operate any coal-fired units therefore this part does not apply.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
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 obligations on the facility beyond those imposed on any individual or corporate owner of such appliances and is mentioned here only in the interest of being 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 panning and excess emission mitigation documents at Belen 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.

The term “alternative operating scenario” is not defined by regulation. EPNG understands this term 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, Belen Compressor Station does not have any alternative operating scenarios.

Units at the facility may be shut down from time to time due to factors including, but not limited to, market demand, maintenance, malfunctions, and emergency shutdowns. Operating in alternative modes and temporary shutdowns are not alternative operating scenarios, as EPNG understands them.

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.

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.

Compliance Test History Table

Unit No.	Test Description	Test Date ¹
A-1	Portable Analyzer for NOx	03/30/2021, 06/23/2020, 04/23/2019, 10/1/2012, 11/3/2009
A-2	Portable Analyzer for NOx	1/20/2023, 10/20/2022, 03/30/2021, 06/23/2020, 10/30/2019, 12/11/2011, 12/8/2010, 11/3/2009

¹The monitoring period exemption in B108.D(2) was invoked for periods with no testing.

Section 19

Requirements for Title V Program

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 an 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.
-

Belen Compressor Station is a 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.

After reasonable inquiry, EPNG states that the facility does not meet the applicability requirements of 40 CFR 64.2. Specifically, no sources at the facility are controlled major sources of regulated pollutants. EPNG will submit the necessary items should the facility or requirements change such that this regulation 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.

EPNG believes that Belen Compressor Station is in compliance with each applicable requirement identified in Section 19.2. This belief was formed after reasonable inquiry. In the event that EPNG should discover new information affecting the compliance status of the facility, EPNG will make appropriate notification and/or take corrective action to ensure continuous compliance with any new and existing state and federal regulations.

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, after reasonable inquiry EPNG states that Belen Compressor Station will continue to operate in compliance with applicable requirements. Additionally, 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 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.

Conditions A109.B. and B105.C of Operating Permit P134-R4 requires EPNG to submit compliance certification reports to the New Mexico Environment Department (NMED) Air Quality Bureau (aqb) and to the EPA no later than January 31st of each year.

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.)
-

EPNG believes that Title VI, Section 608 (National Recycling and Emissions Reduction Program) of the Clean Air Act may apply to this facility. EPNG may own refrigeration equipment containing CFCs 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.

EPNG does not service motor vehicle air conditioners at this facility and, therefore, Section 609 does not apply.

Belen Compressor Station will continue to operate in compliance with the requirements of Title VI, Section 608 of the Clean Air Act, as they apply to this facility.

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**.

EPNG states that Belen Compressor Station is in compliance with the applicable requirements in this section. 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.

Belen Compressor Station is not subject to the requirements of 40 CFR 68, Chemical Accident Prevention Provisions. The definitions in 40 CFR 68.3 state the term "stationary source" 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). Belen Compressor Station is regulated under the DOT Office of Pipeline Safety Regulations and, therefore, 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.)

Counties: Bernalillo County (~77 km)

Indian Tribes and Pueblos: Pueblo of Isleta (~24 km), Laguna Pueblo (~55 km), Canoncito Indian Reservation (~60 km), Alamo Band Navajo Indian Reservation (~63 km), Sandia Pueblo (~71 km), Acoma Pueblo (~77 km)

States: None

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 Perkins

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

Phone: (413) 896-6097

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.

EPNG would like to identify the North American Energy Standards Board (NAESB) Day as the basis for records tracking at Belen 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 (including test reports and summaries) or submitted pursuant to 20.2.7 NMAC reporting requirements is based on the "day" as defined by the local time zone.

Section 22: Certification

Company Name: El Paso Natural Gas LLC

I, Donald W 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 25 day of October, 2024, upon my oath or affirmation, before a notary of the State of

Colorado

[Signature]
*Signature

10/25/2024
Date

Donald W Perkins
Printed Name

Director
Title

Scribed and sworn before me on this 25th day of October, 2024.

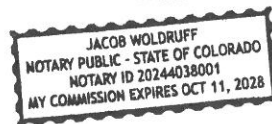
My authorization as a notary of the State of Colorado expires on the

11th day of October, 2028.

[Signature]
Notary's Signature

10/25/2024
Date

Jacob Woldruff
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.