



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/17/2023	
Media Program:	Air	
Regulatory Program(s)	Title V, NESHAP	
Company Name:	El Paso Natural Gas Company, LLC	
Facility Name:	Laguna Compressor Station	
Facility Physical Location:	6 miles E of NW Laguna	
(city, state, zip code)	New Laguna, NM 87038	
Mailing address:	7445 Pan American Fwy, Ste 202,	
(city, state, zip code)	Albuquerque, NM 87109	
County/Parish:	Cibola County	
Facility Phone Number	(505) 552-6149	
Facility Contact:	Richard Duarte	Senior EHS Engineer
	Ricardo_Duarte@kindermorgan.com	
FRS Number:	110022761288	
Identification/Permit Number:	R6FOP-NM-02-R2-2020	
Media Identifier Number:	EIS 7566311	
NAICS:	221210	
SIC:	4922	
Personnel participating in inspection:		
Prince Nfodzo	EPA R6 ECDAP	Environmental Engineer
Bailey Brown	EPA R6 ECDAP	Physical Scientist
Uma Lad	EPA R6 ECDAP	Physical Scientist
Ricardo Duarte	Kinder Morgan/EPNG	Senior EHS Engineer
Adrian Chavez	Kinder Morgan	Operation Specialist
Greg Jojola ¹	POL ENRD ²	Environmental Manager
Henai Lucario ¹	POL ENRD	Environmental Technician
Amy Garcia ¹	POL ENRD	Environmental Specialist
EPA Lead Inspector Signature/Date		
	Prince Nfodzo	Date
Supervisor Signature/Date		
	Darrin Larson	Date

¹ Left after the Opening Conference and facility walk-through.

² Pueblo of Laguna, Environmental and Natural Resources Department

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Prince Nfodzo, Bailey Brown, and Uma Lad, along with Greg Jojola, Amy Garcia, and Henai Lucario from the Pueblo of Laguna Environmental and Natural Resources Department, arrived at the El Paso Natural Gas Company, LLC's ("EPNG") Laguna Compressor Station ("LCS") at 8:30 am on May 17, 2023, for an unannounced inspection. The facility is in Indian country and EPA is responsible for direct implementation. The inspection is in line with EPA's periodic evaluation of the facility's compliance with the CAA. The facility was last inspected July 18, 2017. We met with EPNG representatives Ricardo Duarte (Senior EHS Engineer) and Adrian Chavez (Operations Specialist) at the Opening Conference. I, Prince Nfodzo, presented my credentials to Mr. Duarte and informed him that this was an EPA inspection to determine compliance with the facility's Title V Air Permit and the Clean Air Act ("CAA"). The scope of the inspection is a full compliance evaluation (FCE) and includes evaluation of the facility's compliance with its Title V operating permit (R6FOP-NM-02-R2-2020) and applicable regulations under the CAA. Photographs taken during the inspection were shared with EPNG representatives and are included as **APPENDIX 1**. I discussed CBI claims and informed EPNG representatives to properly identify any CBI information that will be submitted for the inspection. A sign in sheet of personnel attending the opening conference is included as **APPENDIX 2**.

FACILITY DESCRIPTION

El Paso Natural Gas Company, LLC – Laguna Compressor Station, located 6 miles E of NW Laguna, is a natural gas compression and transmission station with pressurized natural gas as its principal product. The facility receives natural gas from an EPNG pipeline. The natural gas passes through inlet separators, which may also be referenced as scrubbers, before re-compression. The facility operates three Clark TLA-10, 2-stroke lean burn, natural gas compressor engines rated at 3,400-horsepower (hp) installed in 1958, and two auxiliary Ingersoll-Rand PSVG-8, 4-stroke rich burn, natural gas-fired engine driven generators, rated at 544-hp. A detailed process description and flow diagram is included as **APPENDIX 3**.

Section II – OBSERVATIONS

On May 17, 2023, EPA Region 6 inspectors conducted surveillance around the facility from 7:25 – 8:15 am prior to making entry. We did not observe any visible emissions and did not observe any hydrocarbon emissions with a Forward Looking Infrared ("FLIR") optical gas imaging (OGI) camera.

After the opening conference, we conducted a facility walk-through. We observed a fenced-out area on the property. Mr. Duarte stated that the fenced-out area contains asbestos (*see AOC #1*).

Engines

EPNG's permit includes two Ingersoll-Rand, Model PSVG-8, 544 hp, 4-stroke rich burn engines installed in 1958 at the LCS. The engines are identified as AUX-01 and AUX-02, with serial numbers 8CPST227 and 8CPST228, respectively. Photographs of the engines are included as **Photo No. 8-10** in **APPENDIX 1**. The auxiliary engines are subject to the requirements of NESHAP Part 63 Subparts A and ZZZZ. The units are

equipped with a non-selective catalytic reduction (“NSCR”) system to control carbon monoxide, formaldehyde, and volatile organic compounds. EPNG monitors and maintains electronic records of the temperature of the exhaust gas exiting the catalytic converter, and the pressure drop across the catalyst element to demonstrate continuous compliance with emission limits in accordance with permit condition V.F.3. I reviewed monitoring records for March 1, 2020, through February 28, 2023, and observed that there was no monitoring record for July 2021 through December 2021 (*see AOC #2*).

The facility’s permit requires that the amount of natural gas burned in each unit and heat input for each unit shall not exceed 78.1 mmscf/yr and 8.13 MMBtu/hr, respectively. EPNG is required to monitor and/or maintain records of fuel flow, heat input, hours of operation, and repair and maintenance activities. At the time of the inspection, both auxiliary engines were not in use. According to EPNG representatives, the engines have not been operated since 2007 (*see AOC #3*). Monitoring records from March 1, 2020, through February 28, 2023, show that the auxiliary engines have not been in operation.

EPNG operates three Clark TLA-10, 3400 hp, two-stroke lean-burn compressor engines installed in 1958 at the LCS. The compressor engines are identified as A-01, A-02 and A-03 with serial numbers 79007, 79008 and 79005, respectively. Photographs of the compressor engines are included as **Photo No. 3 – 7** in **APPENDIX 1**. The compressor engines are exempt from NESHAP Part 63 Subparts A and ZZZZ requirements under § 63.6590(b)(3)(i). At the time of inspection, unit A-02 was out of service and has been down for repairs since March 10, 2023. The facility’s permit requires that the amount of natural gas burned in each unit and heat input for each unit shall not exceed 319.5 mmscf/yr and 33.26 MMBtu/hr, respectively. EPNG is required to monitor and maintain records of fuel flow, heat input, hours of operation, and repair and maintenance activities.

I reviewed Six-Month Monitoring Reports from March 1, 2020, to February 28, 2023, submitted through EPA’s Compliance and Emissions Data Reporting Interface (CEDRI). I observed some deficiencies in the records (*see AOC #4*). I noted that EPNG may be using incorrect units and/or formula that impact the calculation of natural gas burned in each unit (*see AOC #5*). I also observed instances of daily unit operation exceeding 24 hours (*see AOC #6*). Excerpts from the Annual Certification and Six-Month Monitoring report for the period from September 1, 2020, through February 28, 2021, is included as **APPENDIX 4**.

The facility’s permit requires that fuel combusted in the engines is limited to pipeline quality natural gas containing no more than 0.25 grains of hydrogen sulfide (H₂S) per 100 cubic feet. EPNG monitors the sulfur content of the natural gas supplied to the LCS at another EPNG facility located in Plains, TX. I reviewed H₂S monitoring records for April 1, 2023, through May 19, 2023. I noted that the fuel gas H₂S concentration was within permitted limits. The H₂S monitoring record is included as **APPENDIX 5**.

Inlet Separators/Scrubbers

The facility receives natural gas from an EPNG pipeline, and before the natural gas is re-compressed, it first passes through four inlet separators in parallel, which may also be referenced as scrubbers. The

primary purpose of the inlet separators is to remove any lubrication oils or impurities entrained in the natural gas stream from the upstream compressor station. The used oil that accumulates within the separator is periodically discharged manually. We observed emissions from Separator #2 with a FLIR camera (*see AOC #7*) and staining on Separator #3. Photographs of the separators are included as **Photo No. 12 and 13** in **APPENDIX 1**.

Tanks

EPNG's permit includes several storage tanks that are exempt from federal regulatory requirements. Some of the permit representations do not match actual conditions on site (*see AOC #8 and #9*).

Section III – AREAS OF CONCERN

1. We observed a fenced-out area on the facility during a walk-through. Mr. Duarte stated that the fenced-out area contains asbestos. EPNG should take appropriate action to remove asbestos from the area.
2. EPNG keeps monitoring records for the two auxiliary engines electronically in accordance with permit condition V.H.3. Records for July 2021 through December 2021 are missing. EPNG representative stated that temperature and pressure drop records were lost during a system upgrade from Windows 8 to Windows 10. EPNG should put in place appropriate measures to ensure that records are properly secured.
3. EPNG's current federal operating permit includes two auxiliary engines installed in 1958 that have not been operated since October 9, 2007, when EPNG conducted a required initial performance test. EPNG representatives indicated that the company has no intent to operate the emergency engines in the future. Accordingly, EPNG should consider removing the units and any associated emissions from its permit.
4. EPNG is required to submit Six-Month Monitoring Reports per permit condition V.G.4. The report for September 1, 2020 – February 28, 2021, did not include records for December 2020. EPNG should include all data required in their reports. (*see APPENDIX 4*)
5. EPNG is permitted to operate the compression engines with up to 319.5 mmscf/yr fuel flow. The Six-Month Monitoring Report for September 1, 2020 – February 28, 2021, shows the 12-month rolling fuel consumption exceeding this limit in November 2020 for Engines A-01 and A-02. It is unclear if an actual permit exceedance occurred, or if EPNG has an error in their calculations. (*see APPENDIX 4*).
6. The Six-Month Monitoring Reports from September 1, 2020 – February 28, 2021, include multiple instances of daily operating hours exceeding 24 hours for multiple units (*see APPENDIX 4*). EPNG should ensure that reported data is accurate.
7. Emissions were observed from the actuator seal on Inlet Separator #2. EPNG's representative stated that their Greenhouse Gas (GHG) inspection team observed emissions from multiple components on the inlet separators on April 13, 2023 and had repaired the leaking components. A review of the GHG inspection report (**Appendix 6, CBI, not included in this report**) shows that emissions were observed from the actuator seals on all four separators on April 13, 2023. EPNG should repair the leak on the Separator #2 actuator seal.
8. EPNG's permit includes a propylene glycol tank, represented as Emission Unit ID No. 14. EPNG's representative stated that the tank stores Ambitrol, which is predominantly ethylene glycol. A copy of safety data sheet (SDS) provided by EPNG is included as **Appendix 6**. EPNG should revise its permit with accurate representation.

9. EPNG's permit includes Emission Unit ID No. 16, which is described as "8 Diesel and fuel oil storage tanks" and lists 8 lube oil/used oil tanks. No diesel tank is listed, and there is no diesel tank on site. EPNG should revise its permit with accurate representation.

EPA Region 6 inspectors Prince Nfodzo, Bailey Brown, and Uma Lad conducted a closing conference for the inspection at the El Paso Natural Gas Company, LLC's Laguna Compressor Station at 3:36 pm on May 17, 2023. During the closing conference, I presented preliminary findings of the inspection and reviewed AOC #1, #2, #6, #8 and #9 that were noted during the inspection. Additionally, AOCs #3-5 and #7 were determined after the conclusion of the on-site inspection and were not included in the closing conference. I informed the representatives of the procedures that will follow the field inspection, and that the inspection report will be made public on EPA's website. The sign-in sheet for the closing conference is included as **Appendix 2**.

Section IV – FOLLOW UP

On May 24, 2023, EPNG uploaded the following documents that we requested during the inspection to a shared OneDrive folder:

1. A location station plot plan or similar;
2. The original compressor engine manufacturer's recommended operation and maintenance ("O&M") procedures;
3. The current facility's O&M procedures or plan;
4. O&M and environmental training records or planned schedule;
5. Copies of the daily station checks May 1 through May 5, and May 17;
6. A blank copy of the daily station checklist;
7. Supporting information or documents where the lube oil and used oil vapor pressure are classified as "exempt" or insignificant;
8. A copy of Ambitrol Glycol SDS;
9. A listing of each engine's serial number;
10. The H₂S daily average readings for natural gas used during the months of April and to-date in May;
11. A simplified process flow diagram; and,
12. A copy of the recent GHG survey and any work orders for any discovered leaks.

On June 5, 2023, I had a conference call with Mr. Duarte, EPNG's Senior EHS Engineer, to seek clarification on some of the information submitted and discussed all other AOCs noted during the off-site document review.

Section V – LIST OF APPENDICES

Appendix 1 - Photo Log - 13 photos taken 5/17/23

Appendix 2 - Opening and Closing Conference Sign-in Sheets

Appendix 3 - Process Description and Process Flow Diagram

Appendix 4 – Pages from Annual Certification and 6-Month Monitoring Report

Appendix 5 - Fuel H₂S Monitoring Records

Appendix 6 - Ambitrol Safety Data Sheet

CBI Appendices (not included in published version of the report)

Appendix 7 – Greenhouse Gas Inspection Report

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0608.JPG

Date of Photo: 05/17/23

Time of Photo: 8:20 AM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Facility signage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0609.JPG

Date of Photo: 05/17/23

Time of Photo: 8:21 AM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Facility signage.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0613.JPG

Date of Photo: 05/17/23

Time of Photo: 2:05 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Plate on Clark TLA-10 compressor engine, A-03, with serial number 79005.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0612.JPG

Date of Photo: 05/17/23

Time of Photo: 2:05 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Plate on Clark TLA-10 compressor engine, A-02, with serial number 79008.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0614.JPG

Date of Photo: 05/17/23

Time of Photo: 2:06 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Plate on Clark TLA-10 compressor engine, A-01, with serial number 79007.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0615.JPG

Date of Photo: 05/17/23

Time of Photo: 2:07 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Clark TLA-10 compressor engine A-01.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0616.JPG

Date of Photo: 05/17/23

Time of Photo: 2:07 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Clark TLA-10 compressor engine A-01.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0618.JPG

Date of Photo: 05/17/23

Time of Photo: 2:14 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Plate on an Ingersoll-Rand engine, AUX-01, with serial number 8CPST227.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0619.JPG

Date of Photo: 05/17/23

Time of Photo: 2:15 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Plate on an Ingersoll-Rand engine, AUX-02, with serial number 8CPST228.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0620.JPG

Date of Photo: 05/17/23

Time of Photo: 2:17 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Ingersoll-Rand engine, AUX-02.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0621.JPG

Date of Photo: 05/17/23

Time of Photo: 2:19 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: NSCR units with stacks on the Ingersoll-Rand engines.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0622.JPG

Date of Photo: 05/17/23

Time of Photo: 2:27 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Inlet Scrubbers/Separators #3 (right) and #4 (left). Staining present on Separator #3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: El Paso Natural Gas Company, LLC/Laguna Compressor Station		
City: New Laguna	County/Parish: Cibola	State: New Mexico



Photo File Name: DSCN0623.JPG

Date of Photo: 05/17/23

Time of Photo: 2:36 PM

Photographer: Uma Lad

Site Name: Laguna Compressor Station

Description: Inlet Scrubbers/Separators #1 (left) and #2 (right).

Appendix 2

Opening and closing conference sign-in sheets

Opening Conference

Commence opening/pre-inspection meeting 5/17/23 Time: 8:45 am

Name	Title	Representing	Telephone No.
Prince Nfodzo	Environmental Engineer	EPA Region 6	(214) 665-7491
Bailey Brown	Physical Scientist	EPA Region 6	(214) 665-6632
Uma Lad	Physical Scientist	EPA Region 6	(214) 665-8563
Ricardo Duarte	Sr. EHS Engr	EDNG/KM	(505) 269-2794
Adrian Chavez	OP Spec	KMI	(505) 321-9892
Green JOJOLA	Proble of Laguna ^{Environmental Program}	ENV. MNGR	552-7512
Henai Lucario	Environmental Tech.	ENRD	505-615-5939
Amy Garcia	Environmental specialist	POL - ENRD	(505) 552-5042

Conclude opening/pre-inspection meeting 5/17/23 Time: 9:30 amInitials / Date: PN / 5/17/23

Closing Conference

Commenced meeting.....5/17/23.....Time: 3:36 pm

[illegible]

Conclude meeting.....5/17/23.....Time: 4:15 pm

Initials / Date: PN / 5/17/23

Appendix 3

Process Description and Process Flow Diagram

I. Source Information and Emission Units**A. Source Information**

Owner Name: El Paso Natural Gas, L.L.C., a Kinder Morgan Company
2 North Nevada Ave
Colorado Springs, CO 80903

Responsible Official: Philip L. Baca, Albuquerque Division Director
El Paso Natural Gas Company, L.L.C.
5151 E. Broadway, Suite 1680
Tuscan, Arizona 85711
Phone: (520) 663-7113
Email: Philip_Baca@kindermorgan.com

Facility Name: Laguna Compressor Station

Facility Location: 5 miles Southeast of Laguna, Cibola County, New Mexico
Within Pueblo of Laguna
Latitude: 34° 59' 42"
Longitude: 107° 18' 51"

Facility Contact: Richard Duarte
Senior EHS Engineer
7445 Pan American Freeway, Ste 202
Albuquerque, NM 87109
Phone (505) 831-7763
Email: Ricardo_Duarte@kindermorgan.com

SIC Code: 4922

B. Process Description:

EPNG is a natural gas compression and transmission facility with pressurized natural gas as its principal product. The facility's Standard Industrial Classification code is 4922 and the process flow diagram is shown on Figure 1 in Appendix A. The facility receives natural gas from an EPNG pipeline and before the natural gas is re-compressed it first passes through inlet separators, which may also be referenced as scrubbers. The purpose of the inlet separators is to primarily remove any lubrication oils or impurities entrained in the natural gas stream from the upstream compressor station. The used oil that accumulates within the separator is periodically discharged manually. The discharge period is dependent on natural gas demand of the pipeline through the compressor station. The process involves a station technician who inspects the liquid level and by hand slightly opens the discharge valve for a very brief period (estimated to be less than a minute) until an audible sound of natural gas is heard indicating the liquid has vacated the separator's collection basin.

The used oil and any natural gas discharge directly into a process vessel that allows the used oil to come to atmospheric pressure and the residual natural gas vented. From this process vessel,

the used oil automatically drains into the used oil tank where it is eventually recycled as used oil. Because the EPNG pipeline system is bi-directional, the upstream station may be either from Bluewater Compressor Station to the west or Belen Compressor Station to the east. Once the gas is free of oil, it is then compressed by one, two or all three engine driven gas compressors, depending on demand. After compression, the discharged natural gas increases in pressure and temperature. To lower the temperature, the gas finally passes through a fin-fan system (using natural convection) before it exits the facility

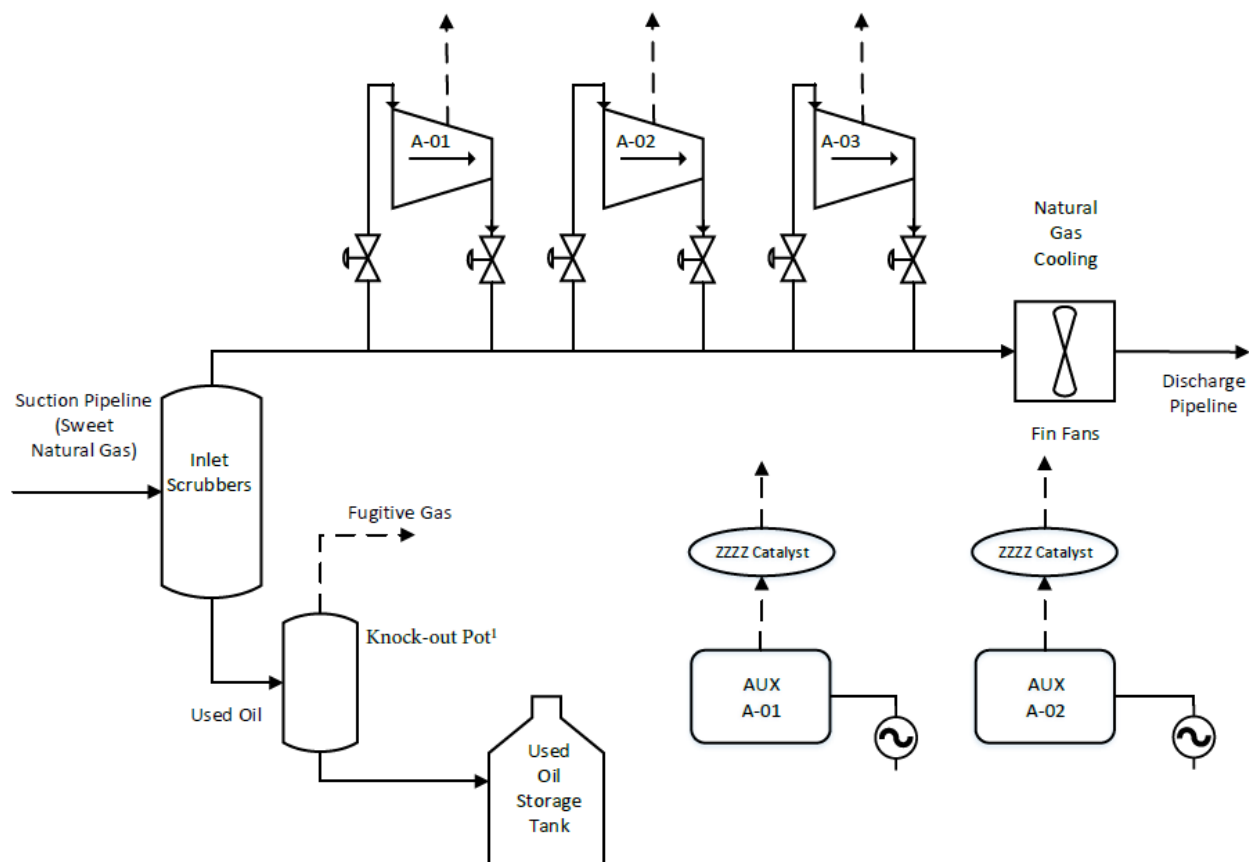
The compressor engines are Clark TLA-10, 2-stroke lean burn, natural gas engines rated at 3,400-horsepower (hp). These units were installed in 1958. These units have the following serial numbers: A-01 with serial number 79007; A-02 with serial number 79008; A-03 with serial number 79005. The Ingersoll-Rand PSVG-8 auxiliary units are 4-stroke rich burn, natural gas-fired engine driven generators, rated at 544-hp, which provide electric power to the station. These units were also installed in 1958. With the exception of switching from one unit to the other, only one can operate at a time; as only one can supply electric power to the station. The serial numbers for these emission units are 8CPST227 for AUX A-01 and 8CPST228 for AUX A-02. Products of combustion from the compressor and generator engines exhaust through independent stacks. The source shall maintain records of the serial numbers, and any change in serial number for each emission unit should be reflected in the semi-annual compliance reports for monitoring and recordkeeping requirements.

C. Compressor Station Emission Units and Control Devices

Table 1. Laguna's Compressor Station Facility

Unit No.	Type of Unit Serial No.	Manufacturer Model No. Design Heat Input	Operating Range or Size of Unit	Date of Installation	Primary Use	Control Equipment
A-01	Natural gas fired Engine, #79007	Clark TLA-10 33.26 MMBtu/hr 2-stroke lean burn	3400 hp	1958	Compressor drive	None <u>Exemption at 40 CFR Part 63.6590(b)(3)(i)</u>
A-02	Natural gas fired Engine, #79008	Clark TLA-10 33.26 MMBtu/hr 2-stroke lean burn	3400hp	1958	Compressor drive	None <u>Exemption at 40 CFR Part 63.6590(b)(3)(i)</u>
A-03	Natural gas fired Engine, #79005	Clark TLA-10 33.26 MMBtu/hr 2-stroke lean burn	3400 hp	1958	Compressor drive	None <u>Exemption at 40 CFR Part 63.6590(b)(3)(i)</u>
Aux- 01	Natural gas fired engine, 8CPST227	Ingersoll-Rand PSVG-8 8.13 MMBtu/hr 4-stroke rich burn	544 hp	1958	Auxiliary electrical generators	QUICK LID Catalytic Converter 76 % Control Efficiency
Aux- 02	Natural gas fired engine, 8CPST228	Ingersoll-Rand PSVG-8 8.13 MMBtu/hr 4-stroke rich burn	544 hp	1958	Auxiliary electrical generators	QUICK LID Catalytic Converter 76 % Control Efficiency

Appendix A
Figure 1: Laguna Compressor Station Process Flow



El Paso Natural Gas Company, LLC – Laguna Compressor Station – Process Flow Diagram

¹See Table 3: Insignificant Emissions Unit

Appendix 4
Pages from Annual Certification and 6-Month Monitoring
Report



El Paso Natural Gas
Company, L.L.C.
a Kinder Morgan company

March 25, 2021

US EPA – Region VI
Enforcement & Compliance Division
Mail code: 6EN-A
1201 Elm Street, Suite 500
Dallas, Texas 75270

FedEx 2-Day Service & CEDRI
#7851 4160 2000

**Re: Annual Certification & Six-Month Monitoring Reports for EPNG's Laguna
Compressor Station - Operating Permit Number R6FOP-NM-02-R2-2020.**

Dear Madam or Sir:

In accord with the requirements of sections III. D. 2 (semi-annual report) and III.D. 3 (annual compliance certification) of the subject permit, enclosed are the two reports. The first is the annual compliance certification report for the period between March 1, 2020 through February 28, 2021, and the second is the six-month monitoring report for the period from September 1, 2020 through February 28, 2021.

If you have any questions on any of this information, please feel free to contact me at (505) 831-7763 or email Ricardo_Duarte@KinderMorgan.com.

Sincerely,


Richard Duarte
Sr. EHS Engineer
El Paso Natural Gas Company, L. L. C.
Air Permitting & Compliance – West, KM Natural Gas Pipelines

Enclosures (ACC and six-month report)

[illegible]

Attachment "B"

Appendix 5

Fuel H₂S Monitoring Records

Asset	PIN	PIN Name	Data Source	Gas Day Date	Hydrogen Sulfide Grains/100scf
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/1/2023 9:00	0.0022
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/2/2023 9:00	0.0023
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/3/2023 9:00	0.0099
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/4/2023 9:00	0.0049
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/5/2023 9:00	0.0034
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/6/2023 9:00	0.0021
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/7/2023 9:00	0.0017
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/8/2023 9:00	0.0025
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/9/2023 9:00	0.0016
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/10/2023 9:00	0.002
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/11/2023 9:00	0.0107
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/12/2023 9:00	0.0135
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/13/2023 9:00	0.0083
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/14/2023 9:00	0.0121
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/15/2023 9:00	0.0099
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/16/2023 9:00	0.0099
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/17/2023 9:00	0.0032
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/18/2023 9:00	0.0025
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/19/2023 9:00	0.0025
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/20/2023 9:00	0.002
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/21/2023 9:00	0.0037
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/22/2023 9:00	0.0027
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/23/2023 9:00	0.0019
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/24/2023 9:00	0.0016
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/25/2023 9:00	0.0046
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/26/2023 9:00	0.0057
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/27/2023 9:00	0.0051
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/28/2023 9:00	0.0035
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/29/2023 9:00	0.0047
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	4/30/2023 9:00	0.0055
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/1/2023 9:00	0.0046
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/2/2023 9:00	0.0051

Asset	PIN	PIN Name	Data Source	Gas Day Date	Hydrogen Sulfide Grains/100scf
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/3/2023 9:00	0.008
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/4/2023 9:00	0.0043
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/5/2023 9:00	0.0038
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/6/2023 9:00	0.0054
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/7/2023 9:00	0.0046
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/8/2023 9:00	0.0052
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/9/2023 9:00	0.0053
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/10/2023 9:00	0.0056
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/11/2023 9:00	0.0063
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/12/2023 9:00	0.0076
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/13/2023 9:00	0.0045
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/14/2023 9:00	0.0049
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/15/2023 9:00	0.0041
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/16/2023 9:00	0.0049
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/17/2023 9:00	0.0036
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/18/2023 9:00	0.0032
EL PASO NATURAL GAS COMPANY, L.L.C.	314405	EPNG/EPNG SAN JUAN X-OVER	Online Analyzer	5/19/2023 9:00	0.0035

Appendix 6
Ambitrol Safety Data Sheet



SAFETY DATA SHEET

THE DOW CHEMICAL COMPANY

Product name: AMBITROL™ FL 50 Coolant, Dyed

Issue Date: 04/19/2017

Print Date: 04/20/2017

THE DOW CHEMICAL COMPANY encourages and expects you to read and understand the entire (M)SDS, as there is important information throughout the document. We expect you to follow the precautions identified in this document unless your use conditions would necessitate other appropriate methods or actions.

1. IDENTIFICATION

Product name: AMBITROL™ FL 50 Coolant, Dyed

Recommended use of the chemical and restrictions on use

Identified uses: Intended as a heat transfer fluid for closed-loop systems. We recommend that you use this product in a manner consistent with the listed use. If your intended use is not consistent with the stated use, please contact your sales or technical service representative.

COMPANY IDENTIFICATION

THE DOW CHEMICAL COMPANY
2030 WILLARD H DOW CENTER
MIDLAND MI 48674-0000
UNITED STATES

Customer Information Number:

800-258-2436
SDSQuestion@dow.com

EMERGENCY TELEPHONE NUMBER

24-Hour Emergency Contact: CHEMTREC +1 800-424-9300

Local Emergency Contact: 800-424-9300

2. HAZARDS IDENTIFICATION

Hazard classification

This material is hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29CFR 1910.1200.

Acute toxicity - Category 4 - Oral

Specific target organ toxicity - repeated exposure - Category 2 - Oral

Label elements

Hazard pictograms



Product name: AMBITROL™ FL 50 Coolant, Dyed**Issue Date: 04/19/2017**Signal word: **WARNING!****Hazards**

Harmful if swallowed.

May cause damage to organs (Kidney) through prolonged or repeated exposure if swallowed.

Precautionary statements**Prevention**

Do not breathe dust/ fume/ gas/ mist/ vapours/ spray.

Wash skin thoroughly after handling.

Do not eat, drink or smoke when using this product.

Response

IF SWALLOWED: Call a POISON CENTER/doctor if you feel unwell. Rinse mouth.

Get medical advice/ attention if you feel unwell.

Disposal

Dispose of contents/ container to an approved waste disposal plant.

Other hazards

No data available

3. COMPOSITION/INFORMATION ON INGREDIENTS

This product is a mixture.

Component	CASRN	Concentration
Ethylene glycol	107-21-1	>= 30.0 - <= 60.0 %
Water	7732-18-5	< 50.0 %
Dipotassium hydrogen phosphate	7758-11-4	< 1.5 %

4. FIRST AID MEASURES

Description of first aid measures

General advice: First Aid responders should pay attention to self-protection and use the recommended protective clothing (chemical resistant gloves, splash protection). If potential for exposure exists refer to Section 8 for specific personal protective equipment.

Inhalation: Move person to fresh air; if effects occur, consult a physician.

Skin contact: Immediately flush skin with water while removing contaminated clothing and shoes. Get medical attention if symptoms occur. Wash clothing before reuse. Destroy contaminated leather items such as shoes, belts, and watchbands. Suitable emergency safety shower facility should be immediately available.

Appendix 7
Green House Gas Inspection Report (CBI)