

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY OPERATING PERMIT NUMBER 17



**EL PASO NATURAL GAS COMPANY
TUCSON COMPRESSOR STATION
8787 PUMP STATION ROAD
MARANA, ARIZONA 85238**

Effective: March 16, 2004 Expires: March 15, 2009

**El Paso Natural Gas Company - Tucson Compressor Station
Air Quality Permit Number 17
Table of Contents**

Source and Permit Overview.....3

Part A: General Provisions..... 4-11

 I. Permit Expiration and Renewal.....4

 II. Compliance with Permit Conditions4

 III. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause.....4

 IV. Posting of Permit.....4

 V. Fee Payment5

 VI. Annual Emissions Inventory Questionnaire.....5

 VII. Compliance Certification.....5

 VIII. Certification of Truth, Accuracy and Completeness5

 IX. Inspection and Entry.....5

 X. Permit Revision Pursuant to Federal Hazardous Air Pollutant Standard6

 XI. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup,
 and Shutdown.....6

 XII. Record Keeping Requirements.....7

 XIII. Reporting Requirements.....8

 XIV. Duty to Provide Information8

 XV. Permit Amendment or Revision.....9

 XVI. Facility Change Allowed Without a Permit Revision9

 XVII. Testing Requirements.....10

 XVIII. Property Rights.....10

 XIX. Severability Clause.....11

 XX. Permit Shield11

 XXI. Accident Prevention Requirements Under the Clean Air Act (CAA Section 112(r)).....11

Summary Table for Part B12

Part B: Specific Provisions 13-14

 I. Applicability.....13

 II. Emission Limits and Standards13

 III. Monitoring and Recordkeeping Requirements.....13

 IV. Reporting Requirements.....13

 V. Testing Requirements.....14

Part C: Applicable Regulations.....15

Part D: Equipment List.....16

Part E: Insignificant Activities17

El Paso Natural Gas Company - Tucson Compressor Station
Air Quality Permit Number 17
Source and Permit Overview

This Title V, Class I operating permit is issued to the El Paso Natural Gas Company (EPNG), the Permittee, for operation of their Tucson Compressor Station. EPNG provides natural gas transportation services for natural gas suppliers and end users throughout the southwestern United States, and owns and operates a large natural gas pipeline network. The Tucson compressor station is one of several such stations that provide natural gas compression to the pipeline network. Compression is needed to maintain enough pressure in the pipeline to keep the natural gas flowing, and is accomplished at the Tucson station by seventeen Cooper Bessemer, Model GMV-10TF, 1,071 horsepower, internal combustion engines to drive the compression units and four Ingersoll Rand, Model PVG-8, 370 horsepower engines to provide auxiliary power to the facility. Both sets of engines are powered exclusively by the combustion of natural gas. Primary electric power for the facility is generated by the auxiliary units. Purchased power is provided for parts of the location. There is no air pollution control equipment installed on any of the engines at the Tucson compressor station. The engines were installed between June 1947 and September 1950. The engines pre-date the NSR program and there are no NSPS or MACT standards applicable to the engines. The county rule, from Title 17 of the Pima County Code, that covers the operation of these engines is 17.16.340 (Standards of performance for existing stationary rotating machinery). This rule contains standards for particulate matter, sulfur dioxide, and an opacity standard. There is no standard for NO_x or CO emissions. The facility is permitted to operate 24 hours a day and 365 days a year.

All terms and conditions of this permit are enforceable by the Administrator of the United States Environmental Protection Agency (U.S.EPA) except as noted. This permit cites only the current SIP and county rules.

The total potential emissions emitted from this facility (excluding insignificant activities) are as follows. These values are for information purposes only and are not enforceable limits.

Pollutants	Nitrogen Oxides	Carbon Monoxide	Volatile Organic Compounds	Formaldehyde	Sulfur Dioxide
Emissions (Tons Per Year)	>250	>250	>100	>10	<100

Activities generating insignificant quantities of emissions are listed in Part "E".

**El Paso Natural Gas Company - Tucson Compressor Station
Air Quality Permit Number 17**

Part A: General Provisions

(All references are to Title 17 of the Pima County Code unless otherwise noted)

- I. Permit Expiration and Renewal [17.12.160.C.2, 17.12.180.A.1, and A.R.S. § 49-480.A]
- A. This permit is valid for a period of five years from the date of issuance of the permit.
- B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not greater than 18 months prior to the date of permit expiration.
- II. Compliance with Permit Conditions. [17.12.180.A and B]
- A. The Permittee shall comply with all conditions of this permit, which contains all applicable requirements of Federal and Arizona air quality statutes, and Federal, State, and Pima County air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- B. Need to halt or reduce activity not a defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- III. Permit Revision, Reopening, Revocation and Reissuance, or Termination for Cause [17.12.180.A.8.c and 17.12.270]
- A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- B. The permit shall be reopened and revised under any of the following circumstances:
1. Additional applicable requirements under the Act become applicable to a major source. Such reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to PCC 17.12.280.B. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.12.280.A and C for permit renewal and shall reset the five-year permit term.
 2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.
 3. The Control Officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 4. The Control Officer or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
- C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in paragraph III.B.1 of this Part shall not result in the resetting of the five-year permit term.
- IV. Posting of Permit [17.12.080]
- A. Permittee shall post such permit, or a certificate of permit issuance on location where the equipment is installed in such a manner as to be clearly visible and accessible. All equipment covered by the permit shall be clearly marked with one of the following:
1. Current permit number.

2. Serial number or other equipment number that is also listed in the permit to identify that piece of equipment.

B. In the event that the equipment is so constructed or operated that such permit cannot be so placed, the permit shall be mounted so as to be clearly visible in an accessible place within a reasonable distance of the equipment or maintained readily available at all times on the operating premises.

C. A copy of the complete permit shall be kept on the site.

V. Fee Payment [17.12.180.A.9 and 17.12.510]

Permittee shall pay fees to the Control Officer pursuant to A.R.S. § 49-480.D and PCC 17.12.510.

VI. Annual Emissions Inventory Questionnaire [17.12.320]

A. When requested by the Control Officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the Control Officer makes the request and provides the inventory form each year, whichever occurs later, and shall include emission information for the previous calendar year.

B. The questionnaire shall be on a form provided by or approved by the Control Officer and shall include the information required by PCC 17.12.320.

VII. Compliance Certification [17.12.180.A.5 and 17.12.210.A.2]

Permittee shall submit to the Control Officer a compliance certification that describes the compliance status of the source with respect to each permit condition. Certifications shall be submitted as specified in Part "B" of this permit and shall include the following:

A. Identification of each term or condition of the permit that is the basis of the certification;

B. Compliance status;

C. Whether compliance was continuous or intermittent;

D. Method(s) used for determining the compliance status of the source, currently and over the reporting period;

E. A progress report on all outstanding compliance schedules submitted pursuant to Section XI.C of this Part.

VIII. Certification of Truth, Accuracy and Completeness [17.12.210.A.3]

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required by this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

IX. Inspection and Entry [17.12.210.A.4]

The Permittee shall allow the Control Officer or the authorized representative of the Control Officer upon presentation of proper credentials to:

A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. Permit Revision Pursuant to Federal Hazardous Air Pollutant Standard [17.12.160.C.4]

If this source becomes subject to a standard promulgated by the Administrator pursuant to section 112(d) of the Act, then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

XI. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown

[17.28.065, A.R.S. §49-480.B, and A.A.C. 18-2-310]

A. Applicability. This permit condition establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

1. Promulgated pursuant to Sections 111 or 112 of the Act,
2. Promulgated pursuant to Titles IV or VI of the Clean Air Act,
3. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. E.P.A.,
4. Contained in PCC 17.16.280.F, or
5. Included in a permit to meet the requirements of PCC 17.16.590.A.5.

B. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The owner or operator of a source with emissions in excess of an applicable emission limitation due to malfunction has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements of XIII.B of this Part and has demonstrated all of the following:

1. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the operator;
2. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
3. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the owner or operator satisfactorily demonstrated that the measures were impracticable;
4. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
5. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
6. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
7. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
8. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
9. All emissions monitoring systems were kept in operation if at all practicable; and
10. The owner or operator's actions in response to the excess emissions were documented by contemporaneous records.

C. Affirmative Defense for Startup and Shutdown

1. Except as provided in XI.C.2, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The

owner or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements of XIII.B of this Part and has demonstrated all of the following:

- a. The excess emissions could not have been prevented through careful and prudent planning and design;
 - b. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
 - c. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
 - d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
 - e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
 - f. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
 - g. All emissions monitoring systems were kept in operation if at all practicable; and
 - h. The owner or operator's actions in response to the excess emissions were documented by contemporaneous records.
2. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to XI.B.

D. Affirmative Defense for Malfunctions During Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to XI.B.

E. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under XI.B or C, the owner or operator of the source shall demonstrate, through submission of the data and information required by this Section and XII.B, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

XII. Record Keeping Requirements

[17.12.180.A.4]

A. Permittee shall keep records of all required monitoring information including, but not limited to, the following:

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The name of the company or entity that performed the analyses;
4. A description of the analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

B. Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

XIII. Reporting Requirements

[17.12.180.A.5.a]

Permittee shall comply with all of the reporting requirements of this permit. These include all of the following:

A. Compliance certifications pursuant to Part “A”, Section VII of this permit.

B. Excess Emissions Reporting Requirements

[A.R.S. §49-480.B, and A.A.C. 18-2-310.01]

1. The owner or operator of any source shall report to the control officer any emissions in excess of the limits established by this permit. The report shall be in two parts as specified below:
 - a. Notification by telephone or facsimile within 24 hours of the time the owner or operator first learned of the occurrence of excess emissions that includes all available information from XIII.B.2.
 - b. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under XIII.B.1.a.
2. The excess emissions report shall contain the following information:
 - a. The identity of each stack or other emission point where the excess emissions occurred;
 - b. The magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
 - c. The time and duration or expected duration of the excess emissions;
 - d. The identity of the equipment from which the excess emissions emanated;
 - e. The nature and cause of the emissions;
 - f. The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunctions;
 - g. The steps that were or are being taken to limit the excess emissions; and
 - h. If the source’s permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the permit procedures.
3. In the case of continuous or recurring excess emissions, the notification requirements of this Section shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to XIII.B.1 and 2.

C. Permit Deviations (Other Than Excess Emissions) Reporting Requirements. The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. For the purposes of this condition, "promptly report" shall mean that the Permittee submitted the report to the control officer by certified mail or hand-delivery within two working days of the time the deviation was discovered.

D. Reporting requirements listed in Part “B” of this permit.

XIV. Duty to Provide Information

[17.12.160.G and 17.12.180.A.8.e]

- A. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee, for Class I sources, shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.
- B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

XV. Permit Amendment or Revision

[17.12.240, 17.12.250, and 17.12.260]

Permittee shall apply for a permit amendment or revision for changes to the facility which do not qualify for a facility change without revision under Section XVI, as follows:

- A. Administrative Permit Amendment (PCC 17.12.240.);
- B. Minor Permit Revision (PCC 17.12.250.);
- C. Significant Permit Revision (PCC 17.12.260.).

The applicability and requirements for such action are defined in the above referenced regulations.

XVI. Facility Change Without Permit Revision

[17.12.230]

- A. Permittee may make changes at the permitted source without a permit revision if all of the following apply:
 - 1. The changes are not modifications under any provision of Title I of the Act (Air Pollution Prevention and Control) or under A.R.S. § 49-401.01(19).
 - 2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions.
 - 3. The changes do not violate any applicable requirements or trigger any additional applicable requirements.
 - 4. The changes satisfy all requirements for a minor permit revision under PCC 17.12.250.
 - 5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
- B. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if it meets all of the requirements of subsections (A) and (C) of this Section.
- C. For each such change under subsections A and B of this Section, a written notice by certified mail or hand delivery shall be received by the Control Officer and, for Class I permits, the Administrator, a minimum of 7 working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change but must be provided as far in advance of the change as possible or, if advance notification is not practicable, as soon after the change as possible. Each notification shall include:
 - 1. When the proposed change will occur.
 - 2. A description of each such change.
 - 3. Any change in emissions of regulated air pollutants.
 - 4. The pollutants emitted subject to the emissions trade, if any.
 - 5. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade.
 - 6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply.
 - 7. Any permit term or condition that is no longer applicable as a result of the change.

XVII. Testing Requirements

[17.12.050]

- A. Operational Conditions During Testing

Tests shall be conducted while the unit is operating under such conditions as the control officer shall specify to the plant operator based on representative performance of the source unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Control Officer, testing may be

performed at a lower rate. Operations during start-up, shutdown, and malfunction (as defined in PCC 17.04.340.A.) shall not constitute representative operational conditions unless otherwise specified in the applicable requirement.

B. Test Plan

At least 14 calendar days prior to performing a test, the owner or operator shall submit a test plan to the Control Officer, in accordance with PCC 17.12.050.B. and the Arizona Testing Manual. This test plan must include the following:

1. test duration;
2. test location(s);
3. test method(s); and
4. source operation and other parameters that may affect test results.

C. Stack Sampling Facilities

Permittee shall provide or cause to be provided, performance testing facilities as follows:

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platforms;
3. Safe access to sampling platforms; and
4. Utilities for sampling and testing equipment.

D. Interpretation of Final Results

Each performance test shall consist of three separate runs using the required test method. Each run shall be conducted in accordance with the applicable standard and test method. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. If a sample is accidentally lost or conditions occur which are not under the Permittee's control and which may invalidate the run, compliance may, upon the Control Officer's approval, be determined using the arithmetic mean of the other two runs.

E. Report of Final Test Results

A written report of the results of all performance tests shall be submitted to the Control Officer within 30 days after the test is performed or as soon as the test results become available. The report shall be submitted in accordance with the Arizona Testing Manual and PCC 17.12.050.A.

F. Cessation of Testing After the First Run Has Started

If the Control Officer or the Control Officer's designee is not present, tests may only be stopped for good cause. Good cause includes, forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions or other conditions beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation that demonstrates good cause must be submitted.

XVIII. Property Rights

[17.12.180.A.8.d]

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

XIX. Severability Clause

[17.12.180.A.7]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

XX. Permit Shield

[17.12.310]

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Part "C" of this permit. The permit shield shall not apply to any change made pursuant to Section XV.B of this Part and

Section XVI of this Part.

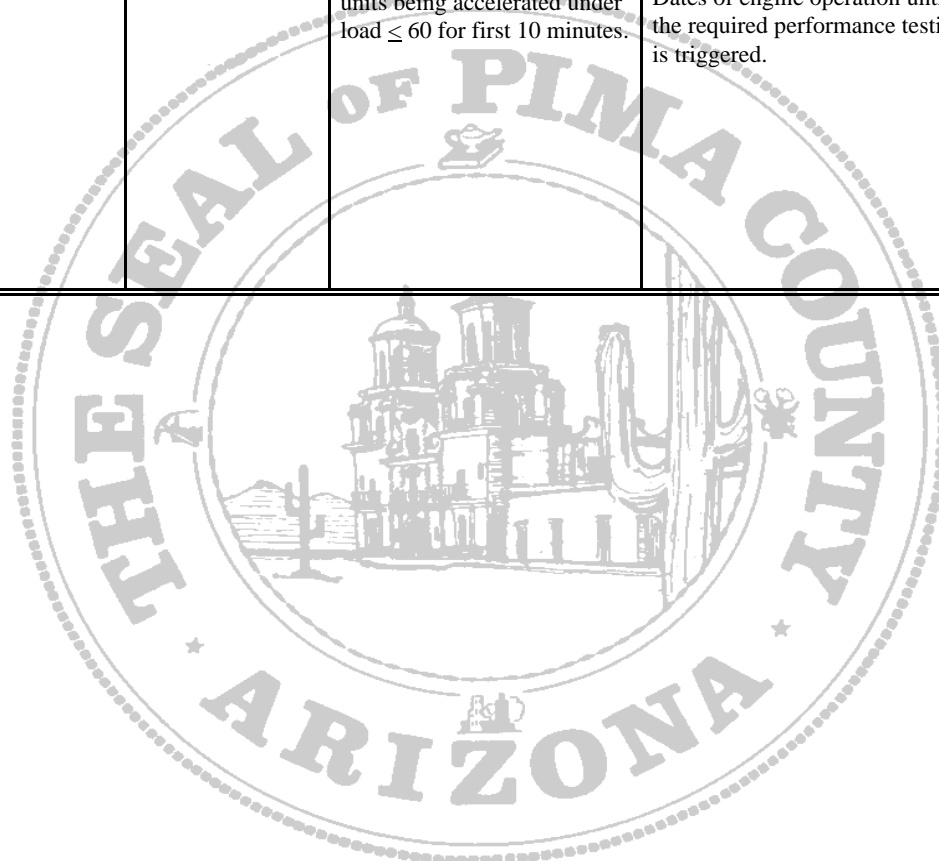
XXI. Accident Prevention Requirements Under the Clean Air Act (CAA Section 112(r))

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the accidental release prevention regulations in Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the semiannual compliance certification as required by 40 CFR Part 70 and Part "B" of this permit.



El Paso Natural Gas Company - Tucson Compressor Station
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Summary Table for Part B

Emission Unit	Pollutants Emitted	Control Measure	Emission Limits /Standards	Monitoring/Recordkeeping	Reporting	Testing Frequency/Methods
Natural Gas IC Compressor Engines	PM, SO _x , NO _x , CO, VOC, HAPs, Opacity	No controls installed.	$E \leq 1.02 Q^{0.769}$ lb/hr Sulfur Content: < 0.9% Permittee shall exclusively fire pipeline quality natural gas. ≤ 40% opacity for any period greater than 10 consecutive seconds; cold equipment and units being accelerated under load ≤ 60 for first 10 minutes.	Daily lower heating value of fuel OR Copy of FERC-approved Tariff agreement lower heating value. Daily sulfur content of fuel OR Copy of FERC-approved Tariff agreement, total sulfur < 0.8% wt. Dates of engine operation until the required performance testing is triggered.	Any change in Tariff agreement relating to lower heating value within 30 days. Any daily period when sulfur > 0.8% OR Any change in Tariff agreement relating to sulfur content and lower heating value of fuel within 30 days. Semi-annual reports of dates of engine operation until the performance test is triggered. Status of testing requirement until performance test is completed.	One time for NO _x and CO using EPA Test Methods 7 and 10 on an engine within 6 months of permit expiration if engine is operated for 360 cumulative hours.



**El Paso Natural Gas Company - Tucson Compressor Station
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Part B: Specific Conditions

(All references are to Title 17 of the Pima County Code unless otherwise noted)

I. Applicability

- A. Affected Emission Source or Process: This Part B contains equipment specific requirements for the installation and operation of Natural gas-fired internal combustion engines for pipeline compression and power production.
- B. Affected Emission Source Classification: **Class I; Major Source for NO_x, CO, VOC, and formaldehyde; True minor for all other pollutants; Stationary Source.**

II. Emission Limits/Standards

A. Particulate Matter Standard

[17.16.340.C.1 and SIP Rule 332]

Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from any stationary rotating machinery having a heat input rate of 4200 million Btu per hour or less in excess of the amounts calculated by the following equation:

$E = 1.02 Q^{0.769}$ where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour.

Q = the heat input in million Btu per hour.

B. Visibility Limiting Standards

[17.16.340.E and SIP Rule 343, 321]

- 1. Permittee shall not cause, allow or permit to be emitted into the atmosphere from any stationary rotating machinery, smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.
- 2. Permittee shall not cause or permit the airborne diffusion of visible emissions beyond the property boundary line without appropriately controlling the emissions at the point of discharge.

C. Fuel Limitation

[17.12.180.A.2.]

Permittee shall combust pipeline quality natural gas as the fuel in the compressor and auxiliary engines.

III. Monitoring and Recordkeeping Requirements

[17.12.180.]

- A. Permittee shall monitor daily, the sulfur content and lower heating value of the fuel being combusted in the engines. This requirement may be complied with by maintaining a copy of that part of the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits transmission to pipeline quality natural gas of sulfur content less than 0.8 percent by weight and having a lower heating value greater than or equal to 967 Btu/ft³.
- B. Permittee shall record the hours of operation of each one of the natural gas fired compressor and auxiliary engines. This information shall be recorded until such time when the 360 cumulative operating hours within the permit term for an individual engine are triggered for conducting a performance test.

IV. Reporting Requirements

[17.12.180.A.5. and 17.12.210.]

- A. Permittee shall submit semiannual compliance certifications to the Control Officer pursuant to Part "A", Section VII. The compliance certification reports shall be due January 31st and July 31st of each year and shall cover the periods July 1st to December 31st and January 31st and June 30th, respectively. The first report may not cover a full 6 months.

- B. Permittee shall notify the Control Officer in writing within 30 days of any changes to the FERC-approved Tariff agreement relating to the fuel sulfur content and lower heating value limits that occur during the term of this permit.
- C. At the time the compliance certifications pursuant to Section VII of Part "A" are submitted, the Permittee shall submit the following information pertaining to each one of the natural gas fired compressor and auxiliary engines:
 - 1. The hours of operation in the six month compliance term. This information shall be reported until such time when the 360 cumulative hours of operation within the permit term are triggered for conducting a performance test; and
 - 2. Until a performance test pursuant to Section IV.A of this Part is completed, the Permittee shall report the status of the testing requirement.
- D. At the time each compliance certification is submitted, the Permittee shall submit reports of all monitoring activities required by Section III of this Part performed during the period of the report. [PCC 17.12.180.A.5.a.]
- E. Permittee shall report to the Control Officer any daily period during which the sulfur content of the fuel being fired in the machine exceeds 0.8 percent. [17.16.340.J.] **[Not Federally Enforceable]**
- F. Every source subject to a permit requirement shall complete and submit an annual emissions inventory questionnaire when requested by the control officer. (See Part "A", Section VI for additional information on this report). [17.12.320.]

V. Testing Requirements

For purposes of District enforcement, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

- A. Permittee shall conduct one performance test on an engine if the cumulative operating hours during the permit term exceeds 360 hours. These performance tests shall be completed within six months prior to permit expiration. Each set of performance tests shall include all of the pollutants listed in Section V.B. of this Part.
- B. Permittee shall use the following EPA approved reference test methods to conduct performance tests for the specified pollutants:
 - 1. Nitrogen Oxides. EPA Reference Method 20.
 - 2. Carbon Monoxide. EPA Reference Method 10.

The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A, to the Director in a test plan, for approval by the Director.

**El Paso Natural Gas Company - Tucson Compressor Station
Air Quality Permit Number 17
Part C: Applicable Regulations**

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE

Compliance with the terms contained in this permit shall be deemed compliance with the following federally applicable requirements in effect on the date of permit issuance:

Pima County SIP:

- Rule 204 Open Burning Permits
- Rule 315 Roads and Streets
- Rule 316 Particulate Materials
- Rule 318 Vacant Lots and Open Spaces
- Rule 321 Emissions-Discharge Opacity Limiting Standards
Standards and Applicability {Includes NESHAPS }
- Rule 332 Compilation of Mass Rates and Concentrations (Includes NESHAPS)
- Rule 343 Visibility Limiting Standard

Compliance with the terms contained in this permit shall be deemed compliance with the following non-federally applicable requirements in effect on the date of permit issuance:

Pima County Code (PCC) Title 17, Chapter 17.16:

- 17.16.050 Visibility Limiting Standard
- 17.16.060 Fugitive Dust Producing Activities
- 17.16.080 Vacant Lots and Open Spaces
- 17.16.090 Roads and Streets
- 17.16.100 Particulate Materials
- 17.16.110 Storage Piles
- 17.16.340 Standards of Performance for Stationary Rotating Machinery
- 17.16.400 Organic Solvents and Other Organic Materials
- 17.16.450 Off-Road Machinery
- 17.16.470 Roadway and Site Cleaning Machinery
- 17.16.530 National Emissions Standards for Hazardous Air Pollutants (NESHAP)

El Paso Natural Gas Company - Vail Compressor Station
Air Quality Permit Number 17
Part D: Equipment List

Equipment Unit ID	Description	Model	Serial Number	Capacity (hp)	Date of Installation
P1; A-1	Cooper Bessemer IC Compressor Engine	GMV-10TF	41366	1071	July 1948
P2; A-2	Cooper Bessemer IC Compressor Engine	GMV-10TF	41365	1071	July 1948
P3; A-3	Cooper Bessemer IC Compressor Engine	GMV-10TF	41367	1071	July 1948
P4; A-4	Cooper Bessemer IC Compressor Engine	GMV-10TF	41478	1071	July 1948
P5; A-5	Cooper Bessemer IC Compressor Engine	GMV-10TF	41364	1071	July 1948
P6; A-6	Cooper Bessemer IC Compressor Engine	GMV-10TF	41479	1071	July 1948
P7; A-7	Cooper Bessemer IC Compressor Engine	GMV-10TF	41482	1071	July 1948
P8; A-8	Cooper Bessemer IC Compressor Engine	GMV-10TF	41742	1071	June 1948
P9; A-9	Cooper Bessemer IC Compressor Engine	GMV-10TF	41740	1071	June 1948
P10; A-10	Cooper Bessemer IC Compressor Engine	GMV-10TF	41739	1071	July 1948
P11; A-11	Cooper Bessemer IC Compressor Engine	GMV-10TF	41741	1071	July 1948
P12; A-12	Cooper Bessemer IC Compressor Engine	GMV-10TF	41818	1071	February 1949
P13; B-1	Cooper Bessemer IC Compressor Engine	GMV-10TF	41820	1071	March 1949
P14; B-2	Cooper Bessemer IC Compressor Engine	GMV-10TF	41821	1071	March 1949
P15; B-3	Cooper Bessemer IC Compressor Engine	GMV-10TF	42382	1071	March 1949
P16; B-4	Cooper Bessemer IC Compressor Engine	GMV-10TF	41819	1071	September 1950
P17; B-5	Cooper Bessemer IC Compressor Engine	GMV-10TF	42383	1071	September 1950
P18; Aux-1	Cooper Bessemer IC Compressor Engine	PVG-8	8GP2294	370	September 1948
P19; Aux-2	Cooper Bessemer IC Compressor Engine	PVG-8	8GP2222	370	November 1947

P20; Aux-3	Cooper Bessemer IC Compressor Engine	PVG-8	8GP2209	370	June 1947
P21; Aux-4	Cooper Bessemer IC Compressor Engine	PVG-8	8GP2208	370	July 1947



El Paso Natural Gas Company – Tucson Compressor Station
Air Quality Permit Number 17
Part E: Insignificant Activities

POTENTIAL EMISSION POINTS CLASSIFIED AS "INSIGNIFICANT ACTIVITIES" PURSUANT TO PCC 17.04.340.A.109.	
S. No.	Description
1	Internal combustion (IC) engine-driven compressors, IC engine-driven electrical generator sets used only for emergency replacement or standby service.
2	Petroleum-based solvent tanks less than 10,000 gallons (solvent with a vapor pressure less than gasoline.)
3	Lube oil storage tanks.
4	Minor natural gas-fired appliances, in the aggregate rated less than 500,000 BTU/hr (such as hot water heaters, HVAC, etc.)
5	Temporary hydrostatic test water evaporation ponds.
6	Pressure tanks.
7	Used oil systems.
8	General maintenance of regulated emissions units, including, but not limited to, oil filter replacement (including drainage of oil filters), and work on the engine jacket water system.
9	Fan systems.
10	Maintenance and use of inertial separators (to filter air intake into the gas turbine engines.)
11	Exercise of standby equipment.
12	Domestic wastewater systems.
13	Plant water and wastewater system.
14	Emergency Shut Down system and pressure relief valves.
15	Blowdown activities during startup and shutdown of turbine engines.
16	Scrubber liquid systems.
17	Oil/water separator system.
18	Cathodic protection system.
19	Vents, valves, and flanges.
20	Solvent degreasing.
21	Cooling water systems.
22	General plant maintenance, construction, and upkeep activities not associated with the Permittee's primary business activity, and not otherwise triggering a permit modification.
23	Manually operated equipment used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, or turning of precision parts, leather, metals, plastics, fiber board, masonry, carbon, glass, or wood .
24	Use of consumer office products.
25	Use and maintenance of electric driven equipment for general location maintenance including but not limited to a bench grinder, drill press, pipe threader, and lathe.
26	Steam cleaning activities.
27	Welding activities.
28	Laboratory equipment.
29	Safety equipment.
30	Uninterruptable power supply systems.
31	Utility pumps and systems.
32	Use of chlorination systems.