# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY CLASS I PERMIT

**PERMITTEE:** **El Paso Natural Gas Company, L.L.C.**
**FACILITY:** *Seligman Compressor Station*
**PERMIT #:** **63249**
**DATE ISSUED:**
**EXPIRY DATE:**

## SUMMARY

This Class I operating permit is issued to El Paso Natural Gas Company, L.L.C., the Permittee, for the continued operation of the Seligman compressor station. The facility is located 9 miles East of Seligman, Arizona on Crookton Road. This permit supersedes and renews Operating Permit No. 48823.

A Class I permit is required because the facility has the potential to emit nitrogen oxides and carbon monoxide in amounts greater than the major source threshold.

This permit is issued in accordance with Arizona Revised Statutes (ARS) 49-426. It contains requirements from Title 18, Chapter 2 of the A.A.C. and Title 40 of the Code of Federal Regulations. All definitions, terms, and conditions used in this permit conform to those in the Arizona Administrative Code R18-2-101 et. seq. (A.A.C.) and Title 40 of the Code of Federal Regulations (CFR), except as otherwise defined in this permit.

## Table of Contents

## ATTACHMENT "A": GENERAL PROVISIONS

**Air Quality Control Permit No. 63249**
**For**
***El Paso Natural Gas Company, L.L.C. – Seligman Station***

### I. PERMIT EXPIRATION AND RENEWAL

[ARS § 49-426.F, A.A.C. R18-2-304.C.2, and -306.A.1]

A. This permit is valid for a period of five years from the date of issuance.

B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months, prior to the date of permit expiration.

### II. COMPLIANCE WITH PERMIT CONDITIONS

[A.A.C. R18-2-306.A.8.a and b]

A. The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona Revised Statutes (A.R.S.) Title 49, Chapter 3, and the and air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any noncompliance 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. 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

[A.A.C. R18-2-306.A.8.c, -321.A.1, and -321.A.2]

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, 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 Clean Air Act become applicable to the Class I source. Such a reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed no 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 an application for renewal has been submitted pursuant to A.A.C. R18-2-322.B. Any permit revision required pursuant to this subparagraph shall comply with the provisions in A.A.C. R18-2-322 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 Director 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 Director 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 reissue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall, except for reopenings under Condition III.B.1 above, affect only those parts of the permit for which cause to reopen exists. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in Condition III.B.1 above shall not result in a resetting of the five-year permit term.

## IV. POSTING OF PERMIT

[A.A.C. R18-2-315]

A. The Permittee shall post this permit or a certificate of permit issuance where the facility is located in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:

1. Current permit number; or

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

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

## V. FEE PAYMENT

[A.A.C. R18-2-306.A.9 and -326]

The Permittee shall pay fees to the Director pursuant to ARS § 49-426(E) and A.A.C. R18-2-326.

## VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE

[A.A.C. R18-2-327.A and B]

A. The Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31st or ninety days after the Director makes the inventory form available 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 the Director and shall include the information required by A.A.C. R18-2-327.

## VII. COMPLIANCE CERTIFICATION

[A.A.C. R18-2-309.2.a, -309.2.c-d, and -309.5.d]

A. The Permittee shall submit a compliance certification to the Director semiannually, which describes the compliance status of the source with respect to each permit condition. The first certification shall be submitted no later than May 15th, and shall report the compliance status of the source during the period between October 1st of the previous year and March 31st of the current year. The second certification shall be submitted no later than November 15th, and shall report the compliance status of the source during the period between April 1st and September 30th of the current year.

The compliance certifications shall include the following:

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

2. Identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period,

3. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in Condition VII.A.2 above. The certifications shall identify each deviation and take it into account for consideration in the compliance certification;

4. For emission units subject to 40 CFR Part 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is required and in which an excursion or exceedance defined under 40 CFR Part 64 occurred;

5. All instances of deviations from permit requirements reported pursuant to Condition XII.B of this Attachment; and

6. Other facts the Director may require to determine the compliance status of the source.

B. A copy of all compliance certifications shall also be submitted to the EPA Administrator.

C. If any outstanding compliance schedule exists, a progress report shall be submitted with the semi-annual compliance certifications required in Condition VII.A above.

## VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

[A.A.C. R18-2-304.H]

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 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

[A.A.C. R18-2-309.4]

Upon presentation of proper credentials, the Permittee shall allow the Director or the authorized representative of the Director to:

A. Enter upon the Permittee's premises where a source is located, 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

[A.A.C. R18-2-304.C]

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. ACCIDENTAL RELEASE PROGRAM

[40 CFR Part 68]

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the time line specified in 40 CFR Part 68.

## XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting

[A.A.C. R18-2-310.01.A and -310.01.B]

1. Excess emissions shall be reported as follows:

   a. The Permittee shall report to the Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:

      (1) Notification by telephone or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XII.A.1.b below.

      (2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XII.A.1.a.(1) above.

   b. The report shall contain the following information:

      (1) Identity of each stack or other emission point where the excess emissions occurred;

      (2) 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;

      (3) Date, time and duration, or expected duration, of the excess emissions;

(4) Identity of the equipment from which the excess emissions emanated;

(5) Nature and cause of such emissions;

(6) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions; and

(7) Steps taken to limit the excess emissions. If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures.

2. 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 such 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 Condition XII.A.1 above.

[A.A.C. R18-2-310.01.C]

B. Permit Deviations Reporting

[A.A.C. R18-2-306.A.5.b]

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. Prompt reporting shall mean that the report was submitted to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to an emergency or within two working days of the time when the owner or operator first learned of the occurrence of a deviation from a permit requirement.

C. Emergency Provision

[A.A.C. R18-2-306.E]

1. An “emergency” means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if Condition XII.C.3 is met.

3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

b. The permitted facility was being properly operated at the time;

c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

d. The Permittee submitted notice of the emergency to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

D. Compliance Schedule

[ARS § 49-426.I.5]

For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Director within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.

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

[A.A.C. R18-2-310]

1. Applicability

This rule 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:

a. Promulgated pursuant to Sections 111 or 112 of the Act;

b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;

c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;

d. Contained in A.A.C. R18-2-715.F; or

e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee 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 Permittee has complied with the

reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;

b. 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;

c. 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 Permittee satisfactorily demonstrated that the measures were impracticable;

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. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

h. 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;

i. All emissions monitoring systems were kept in operation if at all practicable; and

j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records

3. Affirmative Defense for Startup and Shutdown

a. Except as provided in Condition XII.E.3.b below, 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. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee 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 Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has

demonstrated all of the following:

(1) The excess emissions could not have been prevented through careful and prudent planning and design;

(2) 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;

(3) 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;

(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) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

(7) All emissions monitoring systems were kept in operation if at all practicable; and

(8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.

b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to Condition XII.E.2 above.

4. 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 Condition XII.E.2 above.

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XII.E.2 or XII.E.3 above, the Permittee shall demonstrate, through submission of the data and information required by Condition XII.E and A.A.C. R18-2-310.01, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

## XIII. RECORD KEEPING REQUIREMENTS

[A.A.C. R18-2-306.A.4]

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

C. All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

## XIV. REPORTING REQUIREMENTS

[A.A.C. R18-2-306.A.5.a]

The Permittee shall submit the following reports:

A. Compliance certifications in accordance with Section VII of Attachment "A".

B. Excess emission; permit deviation, and emergency reports in accordance with Section XII of Attachment "A".

C. Other reports required by any condition of Attachment "B".

## XV. DUTY TO PROVIDE INFORMATION

[A.A.C. R18-2-304.G and -306.A.8.e]

A. The Permittee shall furnish to the Director, within a reasonable time, any information that the Director 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 Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee 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 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.

## XVI. PERMIT AMENDMENT OR REVISION

[A.A.C. R18-2-318, -319, and -320]

The 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 XVII, as follows:

A. Administrative Permit Amendment (A.A.C. R18-2-318);

B. Minor Permit Revision (A.A.C. R18-2-319); and

C. Significant Permit Revision (A.A.C. R18-2-320)

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

## XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION

[A.A.C. R18-2-317]

A. The 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 or under ARS § 49-401.01(24);

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 A.A.C. R18-2-319.A; and

5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, 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 Conditions XVII.A and XVII.C of this Attachment.

C. For each change under Conditions XVII.A and XVII.B above, a written notice by certified mail or hand delivery shall be received by the Director and 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.

D. Each notification shall include:

1. When the proposed change will occur;

2. A description of the change;

3. Any change in emissions of regulated air pollutants; and

4. Any permit term or condition that is no longer applicable as a result of the change.

E. The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section.

F. Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under A.A.C. R18-2-306.A.11 shall not require any prior notice under this Section.

G. Notwithstanding any other part of this Section, the Director may require a permit to be revised for any change that, when considered together with any other changes submitted by the same source under this Section over the term of the permit, do not satisfy Condition XVII.A above.

## XVIII. TESTING REQUIREMENTS

[A.A.C. R18-2-312]

A. The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.

B. Operational Conditions during Testing

Tests shall be conducted during operation at the maximum possible capacity of each unit under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed at a lower rate. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.

C. Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Director pursuant to A.A.C. R18-2-312.B.

D. Test Plan

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the Director in accordance with A.A.C. R18-2-312.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.

E. Stack Sampling Facilities

The 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 platform(s);

3. Safe access to sampling platform(s); and

4. Utilities for sampling and testing equipment.

F. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Director's approval, be determined using the arithmetic mean of the results of the other two runs. If the Director or the Director's designee is present, tests may only be stopped with the Director's or such designee's approval. If the Director or the Director'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 circumstances 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, which demonstrates good cause, must be submitted.

G. Report of Final Test Results

A written report of the results of all performance tests shall be submitted to the Director within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

## XIX. PROPERTY RIGHTS

[A.A.C. R18-2-306.A.8.d]

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

## XX. SEVERABILITY CLAUSE

[A.A.C. R18-2-306.A.7]

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

## XXI. PERMIT SHIELD

[A.A.C. R18-2-325]

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled "Permit Shield". The permit shield shall not apply to minor revisions pursuant to Condition XVI.B of this Attachment and any facility changes without a permit revision pursuant to Section XVII of this Attachment.

## XXII. PROTECTION OF STRATOSPHERIC OZONE

[40 CFR Part 82]

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

## XXIII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS

[40 CFR Part 60, Part 63]

For all equipment subject to a New Source Performance Standard or a National Emission Standard for Hazardous Air Pollutants, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 and Chapter 63 of the Code of Federal Regulations.

## ATTACHMENT "B": SPECIFIC CONDITIONS

**Air Quality Control Permit No. 63249**
**For**
***El Paso Natural Gas Company, L.L.C. – Seligman Station***

**I.** FACILITY WIDE REQUIREMENTS

**A.** Operational Limitations

1. The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all Method 9 observations and instantaneous visual surveys required by this permit are conducted as Alternative Method-082 (Digital Camera Operating Technique). The Permittee shall certify the camera and the associated software in accordance with ALT-082 procedures. Any Method 9 observation or instantaneous visual survey required by this permit can be conducted as ALT-082. The results of a Method 9 observation or any instantaneous visual survey conducted as ALT-082 shall be obtained within 30 minutes of completing the Method 9 observation or instantaneous visual survey.

[A.A.C. R18-2-306.A.3.c]

2. All equipment identified in Attachment "C" shall be operated and maintained in accordance with vendor-supplied operations and maintenance instructions. If vendor-supplied operations and maintenance instructions are not available or not applicable, the Permittee shall prepare an Operation and Maintenance Plan, which provides adequate information to properly operate and maintain the equipment. In the absence of vendor-supplied operations and maintenance instructions, the Permittee shall operate the equipment in accordance with the Operation and Maintenance Plan.

[A.A.C. R18-2-306.A.3.c]

**B.** Monitoring and Recordkeeping Requirements

1. The Permittee shall maintain, on-site, records of the manufacturer-supplied operations and maintenance instructions or Operation and Maintenance Plan.

[A.A.C. R18-2-306.A.4]

2. The Permittee shall submit reports of all recordkeeping and monitoring required within this Attachment "B" along with the semiannual compliance certifications required by Section VII of Attachment "A".

[A.A.C. R18-2-306.A.5]

**II.** NON-NSPS GAS TURBINE

**A.** Applicability

This Section applies to the General Electric gas turbine.

**B.** Operating Requirements

1. Fuel Limitation

The Permittee shall combust only natural gas in the General Electric gas turbine.

[A.A.C. R18-2-306.A.2]

2. Monitoring and Recordkeeping Requirements

a. The Permittee shall report any daily period during which the sulfur content of the fuel being fired in the stationary rotating machinery exceeds 0.8% by weight.

[A.A.C. R18-2-719.J]

b. The Permittee shall show compliance with Condition II.B.1 above by maintaining records of the gas quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel, which specifies the maximum total sulfur content of the fuel is 20.0 grains per 100 standard cubic feet (scf) or less.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

**C.** Particulate Matter

1. Emission Limitations

a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from the stationary rotating machinery in excess of the amounts calculated by the following equation:

$E = 1.02Q^{0.769}$

Where:

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

Q = the heat input in million Btu per hour.

[A.A.C. R18-2-719.C.1]

b. For the purposes of Condition II.C.1.a above, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. Compliance tests shall be conducted during operation at the normal rated capacity of each unit. The total heat input of all the stationary rotating machinery on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-719.B]

2. Monitoring and Recordkeeping Requirements

The Permittee shall show compliance with Condition II.C.1 above by maintaining records of a current, valid purchase contract, tariff sheet, or transportation contract. The records shall contain information regarding the lower heating value of the fuel.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C.R18-2-719.B and 719.C.1.

[A.A.C. R18-2-325]

**D.** Opacity

1. Emission Limitations

The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the 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.

[A.A.C. R18-2-719.E]

2. Monitoring, Recordkeeping, and Reporting Requirements

A certified EPA Reference Method 9 observer shall conduct a quarterly survey of visible emissions emanating from the stacks of the stationary rotating machinery when in operation. If the machinery is not in operation at the time of survey, the Permittee does not have to set it into operation to conduct the survey. Instead the Permittee shall document that the machinery was not in operation. The Permittee shall keep records of the initial survey and any EPA Reference Method 9 observations performed. These records shall include the emission point observed, location of observer, name of observer, date and time of observation/survey, and the results of the observation/survey. If the opacity of the emissions observed during the initial survey appears to exceed 40%, the observer shall conduct a certified EPA Reference Method 9 observation. If the observation shows a Method 9 opacity reading in excess of 40%, the Permittee shall report this to ADEQ as an excess emission and initiate appropriate corrective action to reduce the opacity to a level below 40%. The Permittee shall keep a record of the corrective action performed.

[A.A.C. R18-2-306.A.3.c, .306.A.4.a and 306.A.5]

3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-719.E.

[A.A.C. R18-2-325]

**E.** Nitrogen Oxides ($NO_X$)

1. Emission Limitations

*The Permittee shall not allow emissions of nitrogen oxides ($NO_X$) from the General Electric turbine to exceed 192 tons per year, calculated daily as a rolling 365-day total.*

[A.A.C R18-2-306.01.A and -331.A.3.a]
[Material permit conditions are indicated by underline and italics]

2. Air Pollution Control Equipment

*The Permittee shall install* and maintain *GE Lean Head End Liners to minimize*

*NOx emissions from the General Electric gas turbine.*

[A.A.C. R18-2-306.01.A and -331.A.3.e]
[Material permit conditions are indicated by underline and italics]

3. Monitoring and Recordkeeping Requirements

a. Continuous Emission Monitoring System (CEMS) Requirements

(1) *The Permittee shall install, calibrate, maintain, and operate a continuous monitoring system (CEMS) for the measurement of $NO_x$ from the General Electric Turbine.*

[A.A.C. R18-2-306.02.C, -306.A.3, -331.A.3.c]
[Material permit conditions are indicated by underline and italics]

(2) *The Permittee shall install, calibrate, maintain, and operate a fuel flow meter for the General Electric turbine according to source-specific maintenance instructions.*

[A.A.C. R18-2-306.02.C, -306.A.3, -331.A.3.c]
[Material permit conditions are indicated by underline and italics]

(3) For demonstrating compliance with Condition II.E.1 above, the Permittee shall utilize the data from the $NO_X$ CEMS required by Condition II.E.3.a.(1) in conjunction with the fuel flow rate monitoring system required by Condition II.E.3.a.(2) and a Data acquisition and Handling System (DAHS) to calculate $NO_x$ emissions in units of pounds per hour (lb/hr) and tons per rolling 365-day total from the General Electric gas turbine.

[A.A.C. R18-2-306.02.C, -306.A.3]

(4) The Permittee shall follow the requirements set forth in 40 CFR 60 Appendix B, Performance Specification 2 "Specifications and Test Procedures for $SO_2$ and $NO_X$ Continuous Emission Monitoring Systems in Stationary Sources", for the $NO_X$ CEMS required under Condition II.E.3.a.(1).

[A.A.C. R18-2-306.02.C, -306.A.3]

(5) The Permittee shall implement a quality assurance (QA) program and plan as described in 40 CFR 60 Appendix F "Quality Assurance Procedures" Procedure 1 for the CEMs required under Condition II.E.3.a.(1).

[A.A.C. R18-2-306.02.C, -306.A.3]

(6) For the $NO_x$ CEMs required under Condition II.E.3.a.(1), the Permittee must check the zero (or low level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily, while the turbine is in operation in accordance with a written procedure. The zero and span must, as a minimum, be adjusted whenever either the 24-hour zero drift or the 24-hour span drift exceeds two times the limit in Performance Specification 2 of 40 CFR 60 Appendix B. The system must allow the amount of the excess zero and span drift to be recorded and quantified whenever specified.

[A.A.C. R18-2-306.02.C, -306.A.3]

(7) The Permittee shall continuously operate the $NO_X$ CEMS except

during periods of system breakdowns, repairs, calibration checks, and zero and span adjustments.

[A.A.C. R18-2-306.02.C, -306.A.3]

(8) The $NO_X$ CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period.

[A.A.C. R18-2-306.02.C, -306.A.3]

(9) The Permittee shall reduce all data to 1-hour averages for the time periods as defined in 40 CFR 60.2.

[A.A.C. R18-2-306.02.C, -306.A.3]

(10) The Permittee shall compute the 1-hour averages required in Condition II.E.3.a.(9) above as follows:

[A.A.C. R18-2-306.02.C, -306.A.3]

(a) Except as provided under Condition II.E.3.a.(10)(b) below, for a full operating hour (any clock hour with 60 minutes of unit operation), at least four valid data points are required to calculate the hourly average, i.e., one data point in each of the 15-minute quadrants of the hour.

(b) For any operating hour in which required maintenance or quality-assurance activities are performed:

[A.A.C. R18-2-306.02.C, -306.A.3]

(i) If the unit operates in two or more quadrants of the hour, a minimum of two valid data points, separated by at least 15 minutes, is required to calculate the hourly average; or

(ii) If the unit operates in only one quadrant of the hour, at least one valid data point is required to calculate the hourly average.

(11) If a daily calibration error check is failed during any operating hour, all data for that hour shall be invalidated, unless a subsequent calibration error test is passed in the same hour and the requirements of Condition II.E.3.a.(10)(b) above are met, based solely on valid data recorded after the successful calibration.

[A.A.C. R18-2-306.02.C, -306.A.3]

(12) Data recorded during periods of continuous monitoring system breakdown, repair, calibration checks, and zero and span adjustments shall not be included in the data averages.

[A.A.C. R18-2-306.02.C, -306.A.3]

(13) Either arithmetic or integrated averaging of all data may be used to calculate the hourly averages. The data may be recorded in reduced or nonreduced form.

[A.A.C. R18-2-306.02.C, -306.A.3]

(14) The Permittee shall maintain records, suitable for inspection, of any period during which a monitoring systems is inoperative.

[A.A.C. R18-2-306.02.C, -306.A.4]

(15) The Permittee shall maintain a file of all measurements including, continuous monitoring system, monitoring device, all continuous system performance evaluations, all continuous monitoring systems calibration checks, adjustments or maintenance performed on these systems or devices recorded in a permanent form suitable for inspection. The file shall be retained for a period of at least two years following the date of such measurements, maintenance, reports, and records.

[A.A.C. R18-2-306.02.C, -306.A43]

4. Performance Testing

[A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-312]

The Permittee shall conduct annual performance evaluations of the $NO_x$ CEMS required under Condition II.E.3.a.(1) in accordance with the applicable performance specification in 40 CFR 60 Appendix B.

**F.** Sulfur Dioxide ($SO_2$)

1. Monitoring, Recordkeeping, and Reporting Requirements

a. The Permittee shall report any daily period during which the sulfur content of the fuel being fired in the stationary rotating machinery exceeds 0.8% by weight.

[A.A.C. R18-2-719.J]

b. The Permittee shall show compliance with Condition II.F.1.a above by maintaining records of the gas quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel which specifies the maximum total sulfur content of the fuel is 20.0 grains per 100 standard cubic feet (scf) or less.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

2. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-719.J.

[A.A.C. R18-2-325]

**G.** Carbon Monoxide (CO)

1. Performance Testing

The Permittee shall conduct a Method 10 performance test for CO on the General Electric gas turbine during the first year of the permit term.

[A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-312]

2. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with Operating Permit No. 28161, Attachment “B” Condition II.C.3.

[A.A.C. R18-2-325]

## III. NSPS GAS TURBINE

### A. Applicability

This Section applies to the Solar gas turbine.

### B. Fuel Limitation

1. The Permittee shall not burn natural gas fuel in the Solar gas turbine, which contains total sulfur in excess of 0.8 percent by weight.

[40 CFR 60.333(b)]

2. Monitoring and Recordkeeping Requirements

The Permittee shall show compliance with Condition III.B.1 above by maintaining records of the gas quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel, which specifies that the maximum total sulfur content of the fuel is 20.0 grains per 100 standard cubic feet (scf) or less.

[40 CFR 60.334(h)(3)(i)]

3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with 40 CFR 60.333(b) and 60.334(h)(3)(i).

[A.A.C. R18-2-325]

### C. Nitrogen Oxides ($NO_x$)

1. Emission Limitations

a. The Permittee shall not cause to be discharged into the atmosphere from the stack of the Solar turbine any gases which contain nitrogen oxide in excess of that calculated from the following equation:

$$STD = 0.0150\frac{(14.4)}{Y} + F$$

where:

STD = allowable $NO_x$ emissions (percent by volume at 15 percent oxygen and on a dry basis).

Y = Manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = $NO_x$ emission allowance for fuel-bound nitrogen as defined in 40 CFR 60.332(a)(4).

[40 CFR 60.332(a)(2) and 40 CFR 60.332(c)]

b. *The Permittee shall not allow $NO_x$ emissions from the Solar gas turbine to exceed 0.10 lb/MMBtu*.

[A.A.C. R18-2-306.01.A, and -331.A.3.a]
[Material permit conditions are identified by underlines and italics]

2. Monitoring, Recordkeeping, and Reporting Requirements

The Permittee shall maintain monthly records of natural gas consumption for the Solar gas turbine.

[A.A.C. R18-2-306.A.3 and -306.02.C]

3. Performance Testing

The Permittee shall conduct Method 20 performance tests semi-annually for $NO_x$ emissions from the gas turbine to determine compliance with the limits specified in Conditions III.C.1.a and b above. The Permittee shall follow the procedures outlined in 40 CFR 60.335 for the performance tests.

[A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-312]

4. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with 40 CFR 60.332(a)(2) and 60.332(c).

[A.A.C. R18-2-325]

**D.** Carbon Monoxide (CO)

1. Performance Test

The Permittee shall conduct a Method 10 performance test for CO on the Solar gas turbine during the first year of the permit term.

[A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-312]

## IV. INTERNAL COMBUSTION ENGINES

**A.** Applicability

This Section applies to the Generac auxiliary generator.

**B.** Operating Requirements

1. Hours Limitation

*The Permittee shall operate the Generac generator no more than 450 hours in any rolling 12-month period.*

[A.A.C. R18-2-306.01.A and -331.A.3.a]
[Material permit conditions are indicated by underline and italics]

2. Fuel Limitation

The Permittee shall combust only natural gas in the Generac auxiliary generator.

[A.A.C. R18-2-306.A.2]

3. Monitoring, Recordkeeping, and Reporting Requirements

a. The Permittee shall demonstrate compliance with Condition IV.B.1 above by maintaining a monthly log of the hours of operation of the Generac generator. At the end of each month, the Permittee shall calculate and record a rolling 12-month total of the hours of operation.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

b. The Permittee shall show compliance with Condition IV.B.2 above by maintaining records of the gas quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel, which specifies that the maximum total sulfur content of the fuel is 20.0 grains per 100 standard cubic feet (scf) or less.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

c. The Permittee shall report any daily period during which the sulfur content of the fuel being fired in the stationary rotating machinery exceeds 0.8% by weight.

[A.A.C. R18-2-719.J]

4. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-719.J.

[A.A.C. R18-2-325]

**C.** Particulate Matter

1. Emission Limitation

a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from the stationary rotating machinery in excess of the amounts calculated by the following equation:

$E = 1.02Q^{0.769}$

Where:

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

Q = the heat input in million Btu per hour.

[A.A.C. R18-2-719.C.1]

b. For the purposes of Condition IV.C.1.a above, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. Compliance tests shall be conducted during operation at the normal rated capacity of each unit. The total heat input of all the stationary rotating machinery on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-719.B]

2. Monitoring and Recordkeeping Requirements

The Permittee shall keep records of a current, valid purchase contract, tariff sheet, or transportation contract which contains information regarding the lower heating value of the fuel.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C.R18-2-719.B and 719.C.1.

[A.A.C. R18-2-325]

**D.** Opacity

1. Emission Limitations

The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the 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.

[A.A.C. R18-2-719.E]

2. Monitoring, Recordkeeping, and Reporting Requirements

A certified EPA Reference Method 9 observer shall conduct a quarterly survey of visible emissions emanating from the stacks of the stationary rotating machinery when in operation. If the machinery is not in operation at the time of survey, the Permittee does not have to set it into operation to conduct the survey. Instead the Permittee shall document that the machinery was not in operation. The Permittee shall keep records of the initial survey and any EPA Reference Method 9 observations performed. These records shall include the emission point observed, location of observer, name of observer, date and time of observation/survey, and the results of the observation/survey. If the opacity of the emissions observed during the initial survey appears to exceed 40%, the observer shall conduct a certified EPA Reference Method 9 observation. If the observation shows a Method 9 opacity reading in excess of 40%, the Permittee shall report this to ADEQ as excess emission and initiate appropriate corrective action to reduce the opacity to a level below 40%. The Permittee shall keep a record of the corrective action performed.

[A.A.C. R18-2-306.A.3.c, .306.A.4.a and 306.A.5]

3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-719.E.

[A.A.C. R18-2-325]

**E.** Nitrogen Oxides ($NO_X$)

1. Emission Limitations

*The Permittee shall not cause to be discharged into the atmosphere, from the Generac generator, any gases which contain $NO_X$ in excess of 9.22 lb/hr*.

[A.A.C. R18-2-306.01.A and -331.A.3.a]
[Material permit conditions are indicated by underline and italics]

2. Performance Testing

[A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-312]

The Permittee shall conduct a Method 7 performance test for $NO_x$ emissions from the auxiliary generator during the first year of the permit term to determine compliance with the limit specified in Condition IV.E.1 above.

**F.** Sulfur Dioxide ($SO_2$)

1. Monitoring, Recordkeeping, and Reporting Requirements

a. The Permittee shall report any daily period during which the sulfur content of the fuel being fired in the stationary rotating machinery exceeds 0.8% by weight.

[A.A.C. R18-2-719.J]

b. The Permittee shall show compliance with Condition IV.F.1.a above by maintaining records of the gas quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel which specifies the maximum total sulfur content of the fuel is 20.0 grains per 100 standard cubic feet (scf) or less.

[A.A.C. R18-2-306.A.3.c and 306.A.4.a]

2. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-719.J.

[A.A.C. R18-2-325]

**G.** Carbon Monoxide (CO)

1. Air Pollution Control Requirements

*The Permittee shall operate* and maintain *a catalytic converter to reduce CO emissions from the auxiliary generator.*

[Operating Permit #28161, Attachment "B" Condition II.B.2 and A.A.C. R18-2-331.A.3.e]
[Material permit conditions are identified by underlines and italics]

2. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with Operating Permit No. 28161, Attachment "B" Condition II.B.2.

[A.A.C. R18-2-325]

**H.** Hazardous Air Pollutants

1. General Requirements

a. Operating Requirements

(1) *The Permittee shall install a non-resettable hour meter on the engine if one is not already installed.*

[40 CFR § 63.6625(f), A.A.C. R-18-331.A.3.c]
[Material Permit Condition is indicated by underline and italics]

(2) At all times the Permittee shall operate and maintain the engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.6605(b)]

(3) The Permittee shall change the oil and filter every 500 hours of operation or annually, whichever comes first.

[40 CFR 63.6603(a) and Table 2d-Item 5.a]

(4) The Permittee shall inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first.

[40 CFR 63.6603(a) and Table 2d-Item 5.b]

(5) The Permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603(a) and Table 2d-Item 5.c]

(6) If the emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements required in Conditions IV.H.1.a.(3) through IV.H.1.a.(5) above, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice shall be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. The Permittee shall report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

[40 CFR § 63.6603(a) and Table 2d-Item 5 and Footnote 2]

(7) The Permittee shall minimize the engine's time at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

[40 CFR 63.6625(h)]

(8) The Permittee may operate the auxiliary engine for the purpose of

maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per calendar year. The Permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of the auxiliary engine beyond 100 hours per year.

[40 CFR 63.6640(f)(2) and (f)(2)(i)]

(9) The Permittee shall not operate the auxiliary engine for more than 50 hours per year except during emergency situations or for maintenance and testing purposes.

[40 CFR 63.6640(f)]

(10) The Permittee may operate the auxiliary engine up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing.

[40 CFR 63.6640(f)(4)]

b. Monitoring Requirements

The Permittee shall operate and maintain the auxiliary engine according to the manufacturer's emission-related written instructions or shall develop and follow an operation and maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e) and Table 6, Item 9]

c. Reporting and Recordkeeping Requirements

(1) The Permittee shall report each instance in which the facility did not meet the requirements in Table of 40 CFR 63 Subpart ZZZZ Table 8.

[40 CFR § 63.6640(e)]

(2) The Permittee shall keep records in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).

[40 CFR 63.6660(a)]

(3) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[40 CFR 63.6660(b)]

(4) The Permittee shall keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[40 CFR 63.6660(c)]

(5) The Permittee shall keep records of the following:

(a) A copy of each notification and report that was submitted to comply with 40 CFR 63 Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).
[40 CFR 63.6655(a)(1)]

(b) The Permittee shall keep records of the maintenance conducted on the auxiliary engine in order to demonstrate that the facility operated and maintained the auxiliary engine and after-treatment control device (if any) according to the Permittee's own maintenance plan.
[40 CFR 63.6655(e)]

(c) The Permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hours meter. The Permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.
[40 CFR 63.6655(f)]

2. Permit Shield

Compliance with the conditions in this Part shall be deemed compliance with 40 CFR 63.6595, 63.6603(a), 63.6605(b), 63.6625(f), 63.6625(h), 63.6625(e), 63.6640(f), 63.6640(e), 63.6650(b), 63.6650(c), 63.6655(a), 63.6655(e), 63.6655(f), 63.6660(a), 63.6660(b), and 63.6660(c).
[A.A.C. R18-2-325]

## V. FUGITIVE DUST REQUIREMENTS

A. Applicability

This Section applies to any source of fugitive dust in the facility.

B. Particulate Matter and Opacity

Open Areas, Roadways & Streets, Storage Piles, and Material Handling

1. Emission Limitations/Standards

a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40% measured in accordance with the Arizona Testing Manual, Reference Method 9.
[A.A.C. R18-2-614]

b. The Permittee shall not cause, allow or permit visible emissions from any

fugitive dust point source, in excess of 20% opacity.

[A.A.C. R18-2-702.B]

c. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:

(1) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means;

[A.A.C. R18-2-604.A]

(2) Keep dust to a minimum from driveways, parking areas, and vacant lots where motor vehicular activity occurs by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means;

[A.A.C. R18-2-604.B]

(3) Keep dust and other particulates to a minimum by employing dust suppressants, temporary paving, detouring, wetting down or by other reasonable means when a roadway is repaired, constructed, or reconstructed;

[A.A.C. R18-2-605.A]

(4) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust;

[A.A.C. R18-2-605.B]

(5) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, handling, or conveying material likely to give rise to airborne dust;

[A.A.C. R18-2-606]

(6) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored;

[A.A.C. R18-2-607.A]

(7) Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents;

[A.A.C. R18-2-607.B]

(8) Any other method as proposed by the Permittee and approved by the Director.

[A.A.C. R18-2-306.A.3.c]

(9) Operate mineral tailings piles by taking reasonable precautions to

prevent excessive amounts of particulate matter from becoming airborne. Reasonable precautions shall mean wetting, chemical stabilization, revegetation or such other measures as are approved by the Director.

[A.A.C R18-2-608]

2. Air Pollution Control Requirements

Haul Roads and Storage Piles

*Water, or an equivalent control, shall be used to control visible emissions from haul roads and storage piles.*

[A.A.C. R18-2-306.A.2 and -331.A.3.d]
[Material Permit Condition is indicated by underline and italics]

3. Monitoring and Recordkeeping Requirements

a. The Permittee shall maintain records of the dates on which any of the activities listed in Conditions V.B.1.c.(1) through V.B.1.c.(8) above were performed and the control measures that were adopted.

[A.A.C. R18-2-306.A.3.c]

b. Opacity Monitoring Requirements

(1) A certified Method 9 observer shall conduct a quarterly visual survey of visible emissions from the fugitive dust sources. The Permittee shall keep a record of the name of the observer, the date and location on which the observation was made, and the results of the observation.

(2) If the observer sees a visible emission from a fugitive dust source that on an instantaneous basis appears to exceed applicable opacity standard, then the observer shall, if practicable, take a six-minute Method 9 observation of the visible emission.

(a) If the six-minute opacity of the visible emission is less than or equal to applicable opacity standard, the observer shall make a record of the following:

(i) Location, date, and time of the observation; and

(ii) The results of the Method 9 observation.

(b) If the six-minute opacity of the visible emission exceeds applicable opacity standard, then the Permittee shall do the following:

(i) Adjust or repair the controls or equipment to reduce opacity to below the applicable standard; and

(ii) Report it as an excess emission under Section XII.A of Attachment “A”.

[A.A.C. R18-2-306.A.3.c]

4. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-604.A, A.A.C. R18-2-604.B, A.A.C. R18-2-605, A.A.C. R18-2-606, A.A.C. R18-2-607, A.A.C. R18-2-608 and A.A.C. R18-2-612.

## VI. MOBILE SOURCE REQUIREMENTS

A. Applicability

The requirements of this Section are applicable to mobile sources which either move while emitting air contaminants or are frequently moved during the course of their utilization but are not classified as motor vehicles, agricultural vehicles, or agricultural equipment used in normal farm operations. Mobile sources shall not include portable sources as defined in A.A.C. R18-2-101.90.

[A.A.C. R18-2-801.A]

B. Particulate Matter and Opacity

1. Emission Limitations/Standards

a. Off-Road Machinery

The Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any off-road machinery, smoke for any period greater than ten consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. Off-road machinery shall include trucks, graders, scrapers, rollers, and other construction and mining machinery not normally driven on a completed public roadway.

[A.A.C. R18-2-802.A and -802.B]

b. Roadway and Site Cleaning Machinery

(1) The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period greater than ten consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes.

[A.A.C. R18-2-804.A]

(2) The Permittee shall take reasonable precautions, such as the use of dust suppressants, before the cleaning of a site, roadway, or alley. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or by other means.

[A.A.C. R18-2-804.B]

c. Unless otherwise specified, no mobile source shall emit smoke or dust the opacity of which exceeds 40%.

[A.A.C. R18-2-801.B]

2. Recordkeeping Requirement

The Permittee shall keep a record of all emissions related maintenance activities performed on the Permittee's mobile sources stationed at the facility as per manufacturer's specifications.

[A.A.C. R18-2-306.A.5.a]

3. Permit Shield

Compliance with this Section shall be deemed compliance with A.A.C. R18-2-801, A.A.C. R18-2-802.A, A.A.C. R18-2-804.A and A.A.C. R18-2-804.B.

[A.A.C. R18-2-325]

## VII. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations/Standards

The Permittee shall not cause or allow sandblasting or other abrasive blasting without minimizing dust emissions to the atmosphere through the use of good modern practices. Good modern practices include:

(1) wet blasting;

(2) effective enclosures with necessary dust collecting equipment; or

(3) any other method approved by the Director.

[A.A.C. R18-2-726]

b. Opacity

The Permittee shall not cause, allow or permit visible emissions from sandblasting or other abrasive blasting operations in excess of 20% opacity, as measured by EPA Reference Method 9.

[A.A.C. R18-2-702.B]

2. Monitoring and Recordkeeping Requirement

Each time an abrasive blasting project is conducted, the Permittee shall make a record of the following:

a. The date the project was conducted;

b. The duration of the project; and

c. Type of control measures employed.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with this Part shall be deemed compliance with A.A.C. R18-2-726 and A.A.C. R18-2-702.B.

[A.A.C.R18-2-325]

B. Use of Paints

1. Volatile Organic Compounds

a. Emission Limitations/Standards

While performing spray painting operations, the Permittee shall comply with the following requirements:

(1) The Permittee shall not conduct or cause to be conducted any spray painting operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray.
[A.A.C.R18-2-727.A]

(2) The Permittee or their designated contractor shall not either:

(a) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or

(b) Thin or dilute any architectural coating with a photochemically reactive solvent.
[A.A.C.R18-2-727.B]

(3) For the purposes of Condition VII.B.1.a.(2), a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in Conditions VII.B.1.a.(3)(a) through VII.B.1.a.(3)(c) below, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

(a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.

(b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.

(c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent.
[A.A.C.R18-2-727.C]

(4) Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in Conditions VII.B.1.a.(3)(a) through VII.B.1.a.(3)(c) above, it

shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

[A.A.C.R18-2-727.D]

b. Monitoring and Recordkeeping Requirements

(1) Each time a spray painting project is conducted, the Permittee shall make a record of the following:

(a) The date the project was conducted;

(b) The duration of the project;

(c) Type of control measures employed;

(d) Material Safety Data Sheets for all paints and solvents used in the project; and

(e) The amount of paint consumed during the project.

(2) Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of Condition VII.B.1.b(1) above.

[A.A.C. R18-2-306.A.3.c]

c. Permit Shield

Compliance with this Part shall be deemed compliance with A.A.C.R18-2-727.

[A.A.C.R18-2-325]

2. Opacity

a. Emission Limitation/Standard

The Permittee shall not cause, allow or permit visible emissions from painting operations in excess of 20% opacity, as measured by EPA Reference Method 9.

[A.A.C. R18-2-702.B]

b. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C.R18-2-702.B.

[A.A.C. R18-2-325]

C. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitation/Standard

The Permittee shall comply with all of the requirements of 40 CFR 61 Subpart M (National Emissions Standards for Hazardous Air Pollutants - Asbestos).

[A.A.C. R18-2-1101.A.8]

2. Monitoring and Recordkeeping Requirement

The Permittee shall keep all required records in a file. The required records shall include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-1101.A.8.

[A.A.C. R18-2-325]

## ATTACHMENT "C": EQUIPMENT LIST

**Air Quality Control Permit No. 63249**
**For**
***El Paso Natural Gas Company, L.L.C. – Seligman Station***

| EQUIPMENT TYPE | MAXIMUM CAPACITY | MAKE | MODEL | SERIAL NUMBER | DATE OF MFG | EQUIPMENT ID | AAC/ NSPS |
|---|---|---|---|---|---|---|---|
| Natural Gas Turbine | 7,110 hp | General Electric | MS3962G | 147839 | 1966 | P-1 | No |
| Natural Gas Turbine | 10,508 hp | Solar | Mars 100-T15000S | OHFO8-M0633 | 2002 | P-2 | Yes |
| Emergency Generator | 276 hp | Generac | SG0175 | 2064852 | 2002 | Aux-1 | No |