

**DRAFT PERMIT # 76597**

**PLACE ID # 9700**

**PERMITTEE:** El Paso Natural Gas Company, LLC  
**FACILITY:** Mohave Topock Compressor Station  
**PERMIT TYPE:** Class I Air Quality Permit  
**DATE ISSUED:**  
**EXPIRY DATE:**

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## SUMMARY

This Class I operating permit is issued to El Paso Natural Gas Company, LLC, the Permittee, for the continued operation of the Mohave Topock Compressor Station. The facility is located at 5255 East Needle Mountain Road, Topock, AZ in Mohave County. This permit renews and supersedes Permit #60544.

The Mohave Topock compressor station facilitates the transportation of natural gas through an interstate pipeline by increasing the pressure of the gas. Three 4,080 horsepower (hp) internal combustion engines are used to power compressors and two 1,500 hp internal combustion engines are used to produce primary electrical power. The facility has one 135 hp emergency generator used to supply electricity during power outages.

The facility is classified as a major source pursuant to A.A.C. R18-2-101(75) because the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compounds (VOCs), and hazardous air pollutants (HAPs) exceed major source thresholds in accordance with A.A.C. R18-2-302.B.1.a.

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.

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**ATTACHMENT "A": GENERAL PROVISIONS**

**I. PERMIT EXPIRATION AND RENEWAL**

- A. This permit is valid for a period of five (5) years from the date of issuance.  
[ARS § 49-426.F, A.A.C. R18-2-306.A.1]
- B. The Permittee shall submit an application for renewal of this permit at least six (6) months, but not more than eighteen (18) months, prior to the date of permit expiration.  
[A.A.C. R18-2-304.D.2]

**II. COMPLIANCE WITH PERMIT CONDITIONS**

- 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 air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, 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.  
[A.A.C. R18-2-306.A.8.a]
- 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.  
[A.A.C. R18-2-306.A.8.b]

**III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE**

- 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.  
[A.A.C. R18-2-306.A.8.c]
- 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 the original permit or any of its terms and conditions has been extended 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;  
[A.A.C. R18-2-321.A.1.a]
  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;

[A.A.C. R18-2-321.A.1.b]

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; and

[A.A.C. R18-2-321.A.1.c]

4. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

[A.A.C. R18-2-321.A.1.d]

- 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 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 reopening 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.

[A.A.C. R18-2-321.A.2]

#### **IV. POSTING OF PERMIT**

- A. The Permittee shall post this permit or a certificate of permit issuance at the facility 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 identification number (equipment ID number) that is also listed in the permit to identify that piece of equipment.

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

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

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

#### **V. FEE PAYMENT**

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

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

#### **VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE**

- A. The Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31<sup>st</sup> or ninety (90) days after the Director makes the inventory form available each year, whichever occurs later, and shall include emission information for the previous calendar year.

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

- 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.B.

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

## VII. COMPLIANCE CERTIFICATION

- 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 15<sup>th</sup>, and shall report the compliance status of the source during the period between October 1<sup>st</sup> of the previous year and March 31<sup>st</sup> of the current year. The second certification shall be submitted no later than November 15<sup>th</sup>, and shall report the compliance status of the source during the period between April 1<sup>st</sup> and September 30<sup>th</sup> of the current year.

[A.A.C. R18-2-309.2.a]

- B. The compliance certifications shall include the following:

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

[A.A.C. R18-2-309.2.c.i]

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,

[A.A.C. R18-2-309.2.c.ii]

3. 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 certifications shall identify each deviation (including any deviations reported pursuant to Condition XI.B of this Attachment) during the period covered by the certification and take it into account for consideration in the compliance certification;

[A.A.C. R18-2-309.2.c.iii]

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;

[A.A.C. R18-2-309.2.c.iii]

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

[A.A.C. R18-2-309.2.c.iv]

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

[A.A.C. R18-2-309.2.d]

- D. If any outstanding compliance schedule exists, a progress report shall be submitted with the semi-annual compliance certifications required in Condition VII.A above. The progress reports shall contain the information required by A.A.C R18-2-309.5.d.

[A.A.C. R18-2-309.5.d]

## VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

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.

[A.A.C. R18-2-309.3]

## **IX. INSPECTION AND ENTRY**

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;  
[A.A.C. R18-2-309.4.a]
- B.** Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;  
[A.A.C. R18-2-309.4.b]
- C.** Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;  
[A.A.C. R18-2-309.4.c]
- D.** Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and  
[A.A.C. R18-2-309.4.d]
- E.** Record any inspection by use of written, electronic, magnetic and photographic media.  
[A.A.C. R18-2-309.4.e]

## **X. ACCIDENTAL RELEASE PROGRAM**

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.

[40 CFR Part 68]

## **XI. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING**

- A.** Excess Emissions Reporting  
[A.A.C. R18-2-310.01.A, B, and C]
  - 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 XI.A.1.b below.

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

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

b. The report shall contain the following information:

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

[A.A.C. R18-2-310.01.B.1]

- (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;

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

- (3) Time and duration, or expected duration, of the excess emissions;

[A.A.C. R18-2-310.01.B.3]

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

[A.A.C. R18-2-310.01.B.4]

- (5) Nature and cause of such emissions;

[A.A.C. R18-2-310.01.B.5]

- (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;

[A.A.C. R18-2-310.01.B.6]

- (7) Steps that were or are being taken to limit the excess emissions; and

[A.A.C. R18-2-310.01.B.7]

- (8) If the excess emissions resulted from startup or malfunction, the report shall contain a list of the steps taken to comply with any permit procedures governing source operation during periods of startup or malfunction.

[A.A.C. R18-2-310.01.B.8]

2. In the case of continuous or recurring excess emissions, the notification requirements 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 XI.A.1 above.

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

**B. Permit Deviations Reporting**



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. Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern. Where the applicable requirement does not address the timeframe for reporting deviations, the Permittee shall submit reports of deviations according to the following schedule:

1. Notice that complies with Condition XI.A.1 above is prompt for deviations that constitute excess emissions;  
[A.A.C. R18-2-306.A.5.b.i]
2. Except as provided in Conditions XI.B.1, prompt notification of all other types of deviations shall be every 6-months, concurrent with the semi-annual compliance certifications required in Section VII, and can be submitted via the “Annual/Semiannual Deviation Monitoring Report” form available on the Arizona Department of Environmental Quality Website.  
[A.A.C. R18-2-306.A.5.b.ii]

C. Emergency Provision

1. An “emergency” means any situation arising from sudden and reasonably 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.  
[A.A.C. R18-2-306.E.1]
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if Condition XI.C.3 below is met.  
[A.A.C. R18-2-306.E.2]
3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:  
[A.A.C. R18-2-306.E.3]
  - a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;  
[A.A.C. R18-2-306.E.3.a]
  - b. The permitted facility was being properly operated at the time of the emergency;  
[A.A.C. R18-2-306.E.3.b]
  - 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

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

- 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.

[A.A.C. R18-2-306.E.3.d]

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

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

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

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

**D. Compliance Schedule**

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.

[ARS § 49-426.1.3]

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

1. Applicability

A.A.C. R18-2-310 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;  
[A.A.C. R18-2-310.A.1]
- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;  
[A.A.C. R18-2-310.A.2]
- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;  
[A.A.C. R18-2-310.A.3]
- d. Contained in A.A.C. R18-2-715.F; or  
[A.A.C. R18-2-310.A.4]
- e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.  
[A.A.C. R18-2-310.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.A.C. R18-2-310.B]

- 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;  
[A.A.C. R18-2-310.B.1]
- 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;  
[A.A.C. R18-2-310.B.2]
- 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;  
[A.A.C. R18-2-310.B.3]
- 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;  
[A.A.C. R18-2-310.B.4]
- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;  
[A.A.C. R18-2-310.B.5]
- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;  
[A.A.C. R18-2-310.B.6]
- 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;  
[A.A.C. R18-2-310.B.7]
- 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;  
[A.A.C. R18-2-310.B.8]

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

[A.A.C. R18-2-310.B.9]

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

[A.A.C. R18-2-310.B.10]

3. Affirmative Defense for Startup and Shutdown

a. Except as provided in Condition XI.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:

[A.A.C. R18-2-310.C.1]

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

[A.A.C. R18-2-310.C.1.a]

(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;

[A.A.C. R18-2-310.C.1.b]

(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;

[A.A.C. R18-2-310.C.1.c]

(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;

[A.A.C. R18-2-310.C.1.d]

(5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

[A.A.C. R18-2-310.C.1.e]

(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;

[A.A.C. R18-2-310.C.1.f]

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

[A.A.C. R18-2-310.C.1.g]

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

[A.A.C. R18-2-310.C.1.h]

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 XI.E.2 above.

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

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 XI.E.2 above.

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

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XI.E.2 or XI.E.3, the Permittee shall demonstrate, through submission of the data and information required by this Condition XI.E and Condition XI.A.1 above, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

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

## XII. RECORDKEEPING REQUIREMENTS

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

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

1. The date, place as defined in the permit, and time of sampling or measurements;

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

2. The date(s) any analyses were performed;

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

3. The name of the company or entity that performed the analyses;

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

4. A description of the analytical techniques or methods used;

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

5. The results of analyses; and

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

6. The operating conditions as existing at the time of sampling or measurement.

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

- B.** The Permittee shall retain records of all required monitoring data and support information for a period of at least five (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.

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

### **XIII. REPORTING REQUIREMENTS**

The Permittee shall submit the following reports:

- A.** Compliance certifications in accordance with Section VII above. [A.A.C. R18-2-306.A.5.a]
- B.** Excess emission; permit deviation, and emergency reports in accordance with Section XI above. [A.A.C. R18-2-306.A.5.b]
- C.** Other reports required by any condition of Attachment “B”.

### **XIV. DUTY TO PROVIDE INFORMATION**

- 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.

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

- 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.

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

### **XV. PERMIT AMENDMENT OR REVISION**

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 XVI below, as follows:

- A.** Administrative Permit Amendment (A.A.C. R18-2-318); [A.A.C. R18-2-318]
- B.** Minor Permit Revision (A.A.C. R18-2-319); and [A.A.C. R18-2-319]
- C.** Significant Permit Revision (A.A.C. R18-2-320) [A.A.C. R18-2-320]

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

## **XVI. FACILITY CHANGE WITHOUT A PERMIT REVISION**

- A. The Permittee may make changes that contravene an express permit term without a permit revision if all of the following apply:

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

1. The changes are not modifications under any provision of Title I of the Act or under ARS § 49-401.01(24);

[A.A.C. R18-2-317.A.1]

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;

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

3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;

[A.A.C. R18-2-317.A.3]

4. The changes satisfy all requirements for a minor permit revision under A.A.C. R18-2-319.A;

[A.A.C. R18-2-317.A.4]

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; and

[A.A.C. R18-2-317.A.5]

6. The changes do not constitute a minor NSR modification.

[A.A.C. R18-2-317.A.6]

- 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 XVI.A, C, and D of this Attachment.

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

- C. For each change under Conditions XVI.A and XVI.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.

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

- D. Each notification shall include:

1. When the proposed change will occur;

[A.A.C. R18-2-317.E.1]

2. A description of the change;

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

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

[A.A.C. R18-2-317.E.3]

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

[A.A.C. R18-2-317.E.7]

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

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

- 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 XVI.

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

- G.** Notwithstanding any other part of Section XVI, 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 Section XVI over the term of the permit, do not satisfy Condition XVI.A above.

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

## **XVII. TESTING REQUIREMENTS**

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

- A.** Except as provided in Condition XVII.F below, the Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.

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

- B.** Operational Conditions during Performance Testing

Performance tests shall be conducted under such conditions as the Director shall specify to the plant operator based on representative performance of the source. The Permittee shall make available to the Director such records as may be necessary to determine the conditions of the performance tests. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative conditions of performance tests unless otherwise specified in the applicable standard.

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

- C.** Performance 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.

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

- D.** Test Plan



At least 14 working days prior to performing a test, the Permittee shall submit a test plan to the Director, which must include the following, in addition to all other applicable requirements, as identified in the Arizona Testing Manual:

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

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:

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

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.

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

**G. Report of Final Test Results**

A written report of the results of performance tests conducted pursuant to 40 CFR 63, shall be submitted to the Director within 60 days after the test is performed. A written report of

the results of all other performance tests shall be submitted within 4 weeks after the completion of the testing as specified in the Arizona Testing Manual. All performance testing reports shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

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

**H. Extension of Performance Test Deadline**

For performance testing required under Condition XVII.A above, the Permittee may request an extension to a performance test deadline due to a force majeure event as follows:

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

1. If a force majeure event is about to occur, occurs, or has occurred for which the Permittee intends to assert a claim of force majeure, the Permittee shall notify the Director in writing as soon as practicable following the date the Permittee first knew, or through due diligence should have known that the event may cause or caused a delay in testing beyond the regulatory deadline. The notification must occur before the performance test deadline unless the initial force majeure or a subsequent force majeure event delays the notice, and in such cases, the notification shall be given as soon as practicable.  
[A.A.C. R18-2-312.J.1]
2. The Permittee shall provide to the Director a written description of the force majeure event and a rationale for attributing the delay in testing beyond the regulatory deadline to the force majeure; describe the measures taken or to be taken to minimize the delay; and identify a date by which the Permittee proposes to conduct the performance test. The performance test shall be conducted as soon as practicable after the force majeure event occurs.  
[A.A.C. R18-2-312.J.2]
3. The decision as to whether or not to grant an extension to the performance test deadline is solely within the discretion of the Director. The Director shall notify the Permittee in writing of approval or disapproval of the request for an extension as soon as practicable.  
[A.A.C. R18-2-312.J.3]
4. Until an extension of the performance test deadline has been approved by the Director under Conditions XVII.H.1, 2, and 3 above, the Permittee remains subject to the requirements of Section XVII.  
[A.A.C. R18-2-312.J.4]
5. For purposes of this Section XVII, a “force majeure event” means an event that will be or has been caused by circumstances beyond the control of the Permittee, its contractors, or any entity controlled by the Permittee that prevents it from complying with the regulatory requirement to conduct performance tests within the specified timeframe despite the Permittee's best efforts to fulfill the obligation. Examples of such events are acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond the control of the Permittee.  
[A.A.C. R18-2-312.J.5]

**XVIII. PROPERTY RIGHTS**

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

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

**XIX. SEVERABILITY CLAUSE**

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.

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

**XX. PERMIT SHIELD**

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 XV.B of this Attachment and any facility changes without a permit revision pursuant to Condition XVI of this Attachment.

[A.A.C. R18-2-317.F, - 320, and -325]

**XXI. PROTECTION OF STRATOSPHERIC OZONE**

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

[40 CFR Part 82]

**XXII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS**

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.

[40 CFR Part 60 Subpart A and Part 63 Subpart A]

**ATTACHMENT "B": SPECIFIC CONDITIONS**

**I. FACILITY-WIDE REQUIREMENTS**

**A. Opacity**

**1. Instantaneous Surveys and Six-Minute Observations**

The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all six-minute observations and instantaneous visual surveys required by this permit are conducted by Alternative Method-082 (Digital Camera Operating Technique). If the Permittee elects to use Method ALT-082 to conduct all six-minute observations and instantaneous visual surveys, the Permittee shall be certified in the use of ALT-082. The result of the six-minute observation or instantaneous visual survey shall be obtained within two hours of completing the six-minute observation or instantaneous visual survey.

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

**2. Monitoring, Recordkeeping, and Reporting Requirements**

a. At the frequency specified in the following sections of this permit, the Permittee shall conduct an instantaneous survey of visible emissions from emission sources, when in operation.

b. If the visible emissions on an instantaneous basis appears less than or equal to the applicable opacity standard, then the Permittee shall keep a record of the name of the observer, the date on which the instantaneous survey was made, and the results of the instantaneous survey.

c. If the visible emissions on an instantaneous basis appears greater than the applicable opacity standard, then the Permittee shall immediately conduct a six-minute observation of the visible emissions.

(1) If the six-minute observation of the visible emissions is less than or equal to the applicable opacity standard, then the Permittee shall record the name of the observer, the date on which the six-minute observation was made, and the results of the six-minute observation.

(2) If the six-minute observation of the visible emissions is greater than the applicable opacity standard, then the Permittee shall do the following:

(a) Adjust or repair the controls or equipment to reduce opacity to less than or equal to the opacity standard;

(b) Record the name of the observer, the date on which the six-minute observation was made, the results of the six-minute observation, and all corrective action taken; and

(c) Report the event as an excess emission for opacity in accordance with Condition XI.A of Attachment "A".

(d) Conduct another six-minute observation to document the effectiveness of the adjustments or repairs completed.

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

**B. Operational Limitations**

1. 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]

**C. Monitoring, Recordkeeping and Reporting 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. STATIONARY ROTATING MACHINERY**

**A. Applicability**

Section II applies to the Cooper Bessemer reciprocating internal combustion engines and the Caterpillar generators.

**B. Operating Limitations**

1. The Permittee shall combust only natural gas in the stationary rotating machinery.

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

2. Except for periods of start up, shutdown, switching and routine maintenance, the Permittee shall operate only one Caterpillar generator at any time.

[Installation Permit #1231, Attachment "B" Condition VII]

3. Monitoring, Recordkeeping, and Reporting Requirements

a. The Permittee shall make a record of the dates and times of operation of each Caterpillar generator.

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

- b. 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]

- c. The Permittee shall show compliance with the reporting requirement in Condition II.B.3.b above by maintaining records of the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying 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]

4. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-306.A.2, -306.A.3.c, -306.A.4.a, -306.A.5, -719.J, and Installation Permit #1231, Attachment "B" Condition VII.

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

C. Particulate Matter (PM) and Opacity

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 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]

- c. The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the Cooper Bessemer engines and the Caterpillar generators smoke for any period of time greater than ten consecutive seconds which exceeds 10 percent opacity. Visible emissions when

starting cold equipment shall be exempt from this requirement for the first ten minutes.

[Installation Permit #1231, Attachment "B" Condition III.A]

2. Monitoring and Recordkeeping Requirements

a. The Permittee shall keep 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]

b. The Permittee shall conduct a survey of visible emissions emanating from the stacks of the stationary rotating machinery during the performance test in II.D.2 below in accordance with Condition I.A.2 above. If the machinery is not in operation at the time of the survey, the Permittee does not have to set it in operation to conduct the survey. Instead, the Permittee shall document that the machinery was not in operation.

[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 Part shall be deemed compliance with A.A.C.R18-2-306.A.3.c, -306.A.4.a, -306.A.5, -719.B, -719.C.1, and Installation Permit #1231, Attachment "B" Condition III.A.

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

**D.** Nitrogen Oxides (NO<sub>x</sub>)

1. Emission Limitations

a. The Permittee shall not cause to be discharged into the atmosphere, from each Cooper Bessemer engine, any gases which contain NO<sub>x</sub> in excess of 24.34 lb/hr.

[Installation Permit #1231, Attachment "B" Condition III.B]

b. The Permittee shall not cause to be discharged into the atmosphere, from each of the Caterpillar generators any gases which contain NO<sub>x</sub> in excess of 6.39 lb/hr.

[Installation Permit #1231, Attachment "B" Condition III.B]

2. Performance Testing

a. Testing Requirements in First Year of Permit Term

Within one year of permit issuance, the Permittee shall conduct a Method 7E performance test for NO<sub>x</sub> on each Cooper Bessemer engine and each Caterpillar generator to demonstrate compliance with the NO<sub>x</sub> standards in Conditions II.D.1.a and II.D.1.b.

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

b. Subsequent Performance Testing Requirements

Subsequent performance testing for the Cooper Bessemer engines and Caterpillar generators shall be conducted in accordance with the schedule listed in Table 1.

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

**Table 1: NO<sub>x</sub> Testing Schedule**

Year of Permit Term	Equipment to be Tested
2 <sup>nd</sup> year	One Cooper Bessemer engine and one Caterpillar generator
3 <sup>rd</sup> year	One Cooper Bessemer engine and One Caterpillar generator
4 <sup>th</sup> year	One Cooper Bessemer engine

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-306.A.3.c, -312, and Installation Permit #1231, Attachment “B” III.B.

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

**E. Carbon Monoxide (CO)**

1. Emission Limitations

a. The Permittee shall not cause to be discharged into the atmosphere, from each Cooper Bessemer engine, any gases which contain CO in excess of 30.43 lb/hr.

[Installation Permit #1231, Attachment “B” Condition III.B]

b. The Permittee shall not cause to be discharged into the atmosphere, from each of the Caterpillar generators any gases which contain CO in excess of 9.58 lb/hr.

[Installation Permit #1231, Attachment “B” Condition III.B]

2. Performance Testing

a. Testing Requirements in First Year of Permit Term

Within one year of permit issuance, the Permittee shall conduct a Method 10 performance test for CO on each Cooper Bessemer engine and each Caterpillar generator to demonstrate compliance with the CO standards in Conditions II.E.1.a and II.E.1.b above.

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

b. Subsequent Performance Testing Requirements



Subsequent performance testing for the Cooper Bessemer engines and Caterpillar generators shall be conducted in accordance with the schedule listed in Table 2.

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

**Table 2.CO Testing Schedule**

Year of Permit Term	Equipment to be Tested
2 <sup>nd</sup> year	One Cooper Bessemer engine and one Caterpillar generator
3 <sup>rd</sup> year	One Cooper Bessemer engine and One Caterpillar generator
4 <sup>th</sup> year	One Cooper Bessemer engine

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-306.A.3.c, -312, and Installation Permit #1231, Attachment “B” III.B.

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

**F. Volatile Organic Compounds (VOC)**

1. Emission Limitations

a. The Permittee shall not cause to be discharged into the atmosphere, from each Cooper Bessemer engine, any gases which contain VOC in excess of 6.09 lb/hr.

[Installation Permit #1231, Attachment “B” Condition III.B]

b. The Permittee shall not cause to be discharged into the atmosphere, from each of the Caterpillar generators, any gases which contain VOC in excess of 3.19 lb/hr.

[Installation Permit #1231, Attachment “B” Condition III.B]

2. Performance Testing

Within one year of permit issuance, the Permittee shall conduct a Method 25A or ASTM 6348 performance test for VOC on each Cooper Bessemer engine and each Caterpillar generator to demonstrate compliance with the VOC standards in Conditions II.F.1.a and II.F.1.b.

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

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-306.A.3.c, -312, and Installation Permit #1231, Attachment “B” III.B.

### III. EMERGENCY GENERATOR

#### A. Applicability

Section III applies to the emergency generator.

#### B. Operating Limitations

##### 1. Fuel Limitation

The Permittee shall combust only natural gas in the emergency generator.

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

##### 2. 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 the reporting requirement in Condition III.B.2.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, specifying 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]

##### 3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-306.A.2, -306.A.3.c, -306.A.4.a, and -719.J

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

#### C. Particulate Matter and Opacity

##### 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 III.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]

- c. The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the emergency generators smoke for any period of time greater than ten consecutive seconds which exceeds 40 % 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 and Recordkeeping Requirements

The Permittee shall keep 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 Part shall be deemed compliance with A.A.C. R18-2-306.A.3.c, -306.A.4.a, -306.A.5, -719.B, -719.C.1, and -719.E.

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

**D. Hazardous Air Pollutants**

1. Applicability

The requirements of 40 CFR 63, Subpart ZZZZ are applicable to the emergency generator identified in Attachment "C".

[40 CFR 63.6580 and 40 CFR 63.6590]

2. Operation and Maintenance

- a. The Permittee shall demonstrate continuous compliance with the following operation and maintenance requirements:

[40 CFR 63.6602, 40 CFR 63.6640(a), and 40 CFR 63 Subpart ZZZZ, Table 2c]

- (1) The Permittee shall change the oil and filter every 500 hours operation or annually, whichever comes first. If the Permittee prefers to extend the oil change requirement, an oil analysis program described below shall be completed. The oil analysis

must be performed at the same frequency specified for changing the oil.

[40 CFR 63.6625(j) and 40 CFR Table 2c of Subpart ZZZZ]

(a) The Permittee shall at a minimum analyze the following three parameters: Total Acid Number, viscosity and water content. The condemning limits for these parameters are as follows:

- (i) Total Acid Number: increased by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of oil when new;
- (ii) Viscosity: changed more than 20 percent from the viscosity of oil when new;
- (iii) Water Content: changed more than 0.5 percent by volume.

(b) If all of the above limits are not exceeded, the Permittee is not required to change the oil. If any of the above limits are exceeded, the Permittee shall change the oil within 2 business days of receiving the results of the analysis or before commencing operation, whichever is later. Records must be kept of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the operation of the engine.

(2) The Permittee shall inspect the spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63 Subpart ZZZZ, Table 2c]

(3) 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 Subpart ZZZZ, Table 2c]

b. If the emergency generator SI Generator is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Condition III.D.2.a(1) through Condition III.D.2.a(3) above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work 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.

[40 CFR 63 Subpart ZZZZ, Table 2c]

- c. At all times, The Permittee shall operate and maintain the emergency SI generator, including associated air pollution control equipment and monitoring equipment, in a manner consistent with 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 as required by 40 CFR Part 63, Subpart ZZZZ have been achieved.

[40 CFR 63.6605(b)]

- d. The Permittee shall operate and maintain the emergency SI generator and any after-treatment control device according to the manufacturer's emission-related written instructions or develop a maintenance plan which must 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)]

- e. *The Permittee shall install a non-resettable hour meter if one is not already installed.*

[40 CFR 63.6625(f) and A.A.C. R18-2-331.A.3.c]

[Material Permit Conditions are indicated by underline and italics]

### 3. Compliance Demonstration

The Permittee shall demonstrate continuous compliance by operating the emergency SI generator according to the requirements of Condition III.D.3.a through Condition III.D.3.d below. If the Permittee does not operate the emergency SI generator according to the requirements in Conditions III.D.3.a through Condition III.D.3.d below, the engine will not be considered an emergency engine under 40 CFR Subpart ZZZZ and must meet all applicable requirements for non-emergency engines.

[40 CFR 63.6640(f)]

- a. There is no time limit on the use of the Emergency SI Engine in emergency situations.

[40 CFR 63.6640(f)(1)]

- b. The Permittee may operate the emergency SI engine for any combination of the purposes specified in Conditions III.D.3.b(1) through III.D.3.b(2) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by Condition III.D.3.c below counts as part of the 100 hours per calendar year allowed by this Condition.

[40 CFR 63.6640(f)(2)]

- (1) For maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine.

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

- (2) 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 owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of the Emergency SI Generator beyond 100 hours per calendar year.

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

- c. The Permittee may operate the emergency SI generator for a maximum of 50 hours in non-emergency situations. The 50 hours of operation in non-emergency situations:

[40 CFR 63.6640(f)(3)]

- (1) Are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Condition III.D.3.b.
- (2) Cannot be used for peak shaving or non-emergency demand response, or to generate income for the Permittee to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

- d. For each stationary RICE in order to demonstrate compliance with the requirement to Work or Management practices, the Permittee shall demonstrate continuous compliance by:

- (1) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
- (2) Developing and following a maintenance plan which must 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, Subpart ZZZZ, Table 6, Item 9]

#### 4. Recordkeeping and Reporting Requirements

- a. The Permittee shall submit all deviations and compliance certifications pursuant to timelines specified in Conditions XI.B and VII.A of Attachment A, respectively.

[A.A.C. R18-2-309.2.a, -309.2.c, -309.2.d, and A.A.C. R18-2-306.A.5.b]

- b. The Permittee shall report any failure to perform the work practice requirements of Condition III.D.2.a per the required schedule. If the failure to perform the work practice requirement is due to an unacceptable risk under federal, state, or local law, the Permittee shall identify in the report the federal, state, or local law under which the risk was deemed unacceptable.

[40 CFR 63 Subpart ZZZZ, Table 2c]

- c. The Permittee shall maintain all records for a period of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[40 CFR 63.6660]

- d. The Permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the Permittee operated and maintained the emergency engine according to manufacturer's emission related operation and maintenance instructions or the Permittee's maintenance plan.

[40 CFR 63.6655(e)]

- e. The Permittee shall keep records of the hours of operation of the RICE that is recorded through the non-resettable hour meter. Records shall include the date, start and stop times, hours 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)]

5. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-306.A.5.b, -309.2.a, -309.2.c, -309.2.d,-331.A.3.c, 40 CFR 63.6580, 63.6590, 63.6602, 63.6605(b), 63.6625(e), 63.6625(f), 63.6625(j), 63.6640(f), 63.6640(f)(1), 63.6640(f)(2), 63.6640(f)(2)(i), 63.6640(f)(3), 63.6655(e), 63.6655(f), and 63.6660.

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

**IV. FUGITIVE DUST REQUIREMENTS**

**A. Applicability**

Section IV applies to any non-point source of fugitive dust in the facility.

**B. Particulate Matter and Opacity**

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

1. Emission Limitations and Standards

- a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40%.

[A.A.C. R18-2-614]

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

- (1) For a building or its appurtenances, or a building or subdivision site, or a driveway, or a parking area, or a vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved

or excavated, keep dust and other types of air contaminants to a minimum 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 vacant lots or an urban or suburban open area 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 or alley is used, 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. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits.

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

- (5) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits.

[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 to prevent excessive amounts of particulate matter from becoming airborne;

[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 to prevent excessive amounts of particulate matter from becoming airborne;

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

- (8) 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]

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

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

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

The Permittee shall maintain records of the dates on which any of the activities listed in Condition IV.B.1.b above were performed and the control measures that were adopted.

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

C. Permit Shield

Compliance with the conditions of Section IV shall be deemed compliance with A.A.C. R18-2-604, -605, -606, 607, -608, and -614.

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

V. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations/Standards

(1) 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:

(2) Wet blasting;

(3) Effective enclosures with necessary dust collecting equipment; or

(4) 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.

[A.A.C. R18-2-702.B.3]

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 Section shall be deemed compliance with A.A.C. R18-2-702.B.3 and -726.

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

**B. Use of Paints**

1. Volatile Organic Compounds

a. Emission Limitations/Standards

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

(2) 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]

(3) 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]

(4) For the purposes of Condition V.B.1.a(3), 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 Condition V.B.1.a(4), 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]

- (5) 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 Condition V.B.1.a(4), 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) Safety Data Sheets (SDS) 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 V.B.1.b(1).

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

c. Permit Shield

- (1) Compliance with this Section 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.

[A.A.C. R18-2-702.B.3]

b. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C.R18-2-702.B.3.

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

C. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitation/Standard

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

[A.A.C. R18-2-1101.A.12]

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 Section shall be deemed compliance with A.A.C. R18-2-1101.A.12.

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

**ATTACHMENT "C": EQUIPMENT LIST**

**Air Quality Control Permit No. 76597**

***El Paso Natural Gas Company LLC – Mohave Topock Compressor Station***

<b>EQUIPMENT TYPE</b>	<b>MAX. CAPACITY</b>	<b>MAKE/ MODEL</b>	<b>SERIAL NUMBER</b>	<b>INSTALLATION/ MFG. DATE</b>	<b>NSPS/NESHAP Requirements</b>
Two Stroke Lean Burn Engine	4,080 hp*	Cooper Bessemer / 8W330	49094	June 3, 1991	No
Two Stroke Lean Burn Engine	4,080 hp*	Cooper Bessemer / 8W330	49095	June 18, 1991	No
Two Stroke Lean Burn Engine	4,080 hp*	Cooper Bessemer / 8W330	49096	July 19, 1991	No
Four Stroke Lean Stroke Engine	1,500 hp*	Caterpillar / 3606 SI	3XF00019	June 12, 1991	No
Four Stroke Lean Burn Engine	1,500 hp*	Caterpillar / 3606 SI	3XF00020	July 31, 1991	No
Emergency** Generator	135 hp	Onan / LSG-8751-6003-C	12228	1992	Subject to 40 CFR 63 Subpart ZZZZ

*\*ISO hp (sea level, 59° F). \*\*Emergency generator engine used for backup power only.*