



**TECHNICAL REVIEW AND EVALUATION  
OF APPLICATION FOR  
AIR QUALITY PERMIT No. 77319**

**I. INTRODUCTION**

This Class I, Title V operating permit renewal is issued to Transwestern Pipeline Company LLC, the Permittee, for the continued operation of its Transwestern Pipeline - Kingman Compressor Station, located at 40 miles East of Kingman on I-40 in Mohave County, Arizona. Permit # 77319 renews and supersedes Permit # 60088.

**A. Company Information**

Facility Name: Transwestern Pipeline - Kingman Compressor Station

Mailing Address: 6381 Main Street, Roswell, NM 88201

Facility Location: 40 miles East of Kingman on I-40 in Mohave County, Arizona

**B. Attainment Classification (Source: 40 CFR §81.303)**

This facility is located in an area that is in attainment for all criteria pollutants.

**II. PROCESS DESCRIPTION**

Transwestern Pipeline Company provides natural gas transportation services for natural gas suppliers and end users throughout the southwestern United States. Compression is needed to maintain enough pressure in the pipeline to keep the natural gas flowing through the pipeline network, and is accomplished at the Kingman Compressor Station by a General Electric natural gas fired turbine, which drives the compressor unit. The station has one natural gas-fired generator to provide emergency power for the facility.

**III. COMPLIANCE HISTORY**

During the five (5) year permit term that Transwestern Pipeline Company operated under Permit No. 60088, the facility had four (4) performance tests, four (4) physical inspections, and nine (9) compliance certification reviews. This facility is in compliance with the applicable permit conditions and no air quality cases or violations were issued during the permit term.

#### IV. EMISSIONS

The facility has a potential-to-emit (PTE) more than the major source thresholds of nitrogen oxides (NO<sub>x</sub>). The facility's PTE is provided in Table-1 below:

**Table 1: Potential to Emit**

Pollutant	Emissions (tons per year)
NO <sub>x</sub>	128.93
PM <sub>10</sub>	7.03
PM <sub>2.5</sub>	7.03
CO	78.75
SO <sub>2</sub>	3.62
VOC	9.69
HAPs	0.81

#### V. APPLICABLE REGULATIONS

Table 2 identifies applicable regulations and verification as to why that standard applies.

**Table 2: Applicable Regulations**

Unit & year	Control Device	Rule	Discussion
Stationary Gas Turbine	None	40 CFR 60 Subpart GG	These standards are applicable to stationary gas turbines larger than 10 MMBtu/hr heat input and manufactured after October 3, 1977.
Emergency Generator	None	A.A.C. R18-2-719  40 CFR Part 63 Subpart ZZZZ	Standards of Performance for Existing Stationary Rotating Machinery  National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocal Internal Combusting Engines.
Fugitive dust sources	Water Trucks Dust Suppressants	A.A.C. R18-2 Article 6 A.A.C. R18-2-702	These standards are applicable to all fugitive dust sources at the facility.
Abrasive Blasting	Wet blasting; Dust collecting equipment; Other approved methods	A.A.C. R-18-2-702 A.A.C. R-18-2-726	These standards are applicable to any abrasive blasting operation.

**Table 2: Applicable Regulations (Continued)**

Unit & year	Control Device	Rule	Discussion
Spray Painting	Enclosures	A.A.C. R18-2-702 A.A.C. R-18-2-727	This standard is applicable to any spray painting operation.
Demolition/renovation operations	N/A	A.A.C. R18-2-1101.A.8	This standard is applicable to any asbestos related demolition or renovation operations.

**VI. PREVIOUS PERMIT AND CONDITIONS****A. Previous Permit Conditions**

Table 3 compares the sections in Permit # 60088 with the conditions in this renewal permit:

**Table 3: Previous Permit Conditions**

Section No.	Determination		Comments
	Revised	Delete	
Att. "A"	X		General Provisions: Revised to represent the most recent template language
Att. "B" Section I	X		Facility wide requirements: Revised to represent the most recent template language
Att. "B" Section IV	X		Fugitive Dust Requirements - Revised to reflect most recent permitting language.
Att. "B" Section V		X	Mobile Source Requirements: Deleted.
Att. "C"	X		Equipment List: Revised to reflect the most recent equipment operating at the facility and to include equipment information provided.

**VII. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS****A. Facility Wide**

1. Along with the semiannual compliance certification, the Permittee is required to submit reports of all recordkeeping, monitoring and maintenance required by the permit.
2. The Permittee is required to maintain, on-site, records of the manufacturer's specifications or an Operation and Maintenance Plan for all equipment listed in the permit.

**B. NSPS Gas Turbine Engine**

The Permittee is required to demonstrate that the gaseous fuel burned in the gas turbine meets the definition of "natural gas" in 40 CFR 60.331(u) by maintaining 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 grains/100 scf or less.

**C. Emergency Spark Ignition Engine (Generator)**

1. Operating Limitations

The Permittee is required to keep records of monthly totals of the hours of operation of the emergency generator and purpose of operation.

2. Particulate Matter and Opacity

A certified EPA Reference Method 9 observer is required to conduct a quarterly survey of visible emissions emanating from the emergency generator stack, if the generator is in operation.

3. Sulfur Dioxide

a. The Permittee is required to record daily the sulfur content and lower heating value of the fuel being fired in the emergency generator, and maintain a copy of that part of the Federal Energy Regulatory Commission (FERC)-approved Tariff agreement that limits transmission of pipeline-quality natural gas to sulfur content less than or equal to 0.8% and to having a heating value greater than or equal to 967 Btu/ft<sup>3</sup>.

b. The Permittee is required to report to the Director any daily period during which the sulfur content of the fuel being fired in the emergency generator exceeds 0.8%.

4. Hazardous Air Pollutants

a. The Permittee is required to keep records of the hours of operation of the RICE that is recorded through the non-resettable hour meter.

b. The Permittee is required to keep records of the maintenance conducted on the stationary RICE.

**D. Fugitive Dust**

1. The Permittee is required to keep record of the dates and types of dust control measures employed.

2. The Permittee is required to show compliance with the opacity standards by having a Method 9 certified observer perform a monthly survey of visible emission from fugitive dust sources. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.

- 3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
- 4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

**E. Periodic Activities**

- 1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.
- 2. The Permittee is required to record the date, duration, quantity of paint used, any applicable MSDS, and pollution control measures of any spray painting project.
- 3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the “NESHAP Notification for Renovation and Demolition Activities” form and all supporting documents.

**VIII. TESTING REQUIREMENTS**

The Permittee is required to conduct an annual performance test on the NO<sub>x</sub> emissions from the gas turbine.

**IX. LIST OF ABBREVIATIONS**

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
NO <sub>x</sub>	Nitrogen Oxide
PM	Particulate Matter
PM <sub>2.5</sub>	Particulate Matter Nominally less than 2.5Micrometers
PM <sub>10</sub>	Particulate Matter Nominally less than 10 Micrometers
PTE	Potential-to-Emit
scf	Standard Cubic Foot
SO <sub>2</sub>	Sulfur Dioxide
VOC	Volatile Organic Compound