

## CLASS I AIR QUALITY PERMIT

### DRAFT PERMIT 79880

**PERMITTEE:** North Baja Pipeline, LLC  
**FACILITY:** Ehrenberg Compressor Station  
**PLACE ID:** 15267  
**DATE ISSUED:** Draft  
**EXPIRY DATE:** Draft

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#### SUMMARY

This Class I air quality permit is issued to North Baja Pipeline LLC (NBP), the Permittee, for the continued operation of the Ehrenberg Compressor Station. The facility is located at Ehrenberg, La Paz County, Arizona. This permit supersedes the previous Class II Permit No. 65988.

The Ehrenberg Compressor Station transports natural gas along the pipeline by receiving low-pressure inlet natural gas and compressing the stream to increase the pressure and maintain the downstream flow. The Ehrenberg Compressor Station has the ability to operate 7 days per week, 24 hours per day. The primary equipment consists of 3 gas-fired, centrifugal turbines. Two existing turbines are rated at 7,700 hp and one new is rated at 29,626 hp. The facility also has a 1,085 hp standby generator driven by a natural gas-fired reciprocating internal combustion engine and one fuel gas heater rated at 0.88 MMBtu/hr.

The facility has the potential to emit (PTE), without the controls or operating limitations specified in this permit, criteria pollutant emissions in excess of major source thresholds. Therefore, a Class I permit is required under Arizona Administrative Code (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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**Table of Contents**

<b>ATTACHMENT “A”: GENERAL PROVISIONS .....</b>	<b>4</b>
I. PERMIT EXPIRATION AND RENEWAL .....	4
II. COMPLIANCE WITH PERMIT CONDITIONS .....	4
III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE .....	4
IV. POSTING OF PERMIT .....	5
V. FEE PAYMENT .....	5
VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE .....	5
VII. COMPLIANCE CERTIFICATION .....	6
VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS .....	7
IX. INSPECTION AND ENTRY .....	7
X. ACCIDENTAL RELEASE PROGRAM .....	7
XI. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING .....	7
XII. RECORDKEEPING REQUIREMENTS .....	13
XIII. REPORTING REQUIREMENTS .....	14
XIV. DUTY TO PROVIDE INFORMATION .....	14
XV. PERMIT AMENDMENT OR REVISION .....	14
XVI. FACILITY CHANGE WITHOUT A PERMIT REVISION .....	15
XVII. TESTING REQUIREMENTS .....	16
XVIII. PROPERTY RIGHTS .....	19
XIX. SEVERABILITY CLAUSE .....	19
XX. PERMIT SHIELD .....	19
XXI. PROTECTION OF STRATOSPHERIC OZONE .....	19
XXII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS .....	19
<b>ATTACHMENT “B”: SPECIFIC CONDITIONS .....</b>	<b>20</b>
I. FACILITY-WIDE REQUIREMENTS .....	20
II. COMBUSTION TURBINES REQUIREMENTS .....	22
III. EMERGENCY GENERATOR .....	25
IV. FUEL GAS HEATER .....	29
V. GHG AND VOC FUGITIVE EMISSIONS REQUIREMENTS .....	30
VI. FUGITIVE DUST REQUIREMENTS .....	41
VII. OTHER PERIODIC ACTIVITIES .....	42
<b>ATTACHMENT “C”: EQUIPMENT LIST .....</b>	<b>47</b>

**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:  
[A.A.C. R18-2-315.A]
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.
- 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. R18-2-309.2c.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 above, 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.I.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]

**XII. RECORDKEEPING REQUIREMENTS**

- (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]
- B. Minor Permit Revision; and [A.A.C. R18-2-319]
- C. Significant Permit Revision [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:
  - 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.** 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**

**a. Instantaneous Surveys**

Any instantaneous survey required by this permit shall be determined by either option listed in Conditions I.A.1.a(1) and (2):

[A.A.C. R18-2-311.b]

**(1) Alternative Method ALT-082 (Digital Camera Operating Technique)**

**(a)** The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

**(b)** The results of all instantaneous surveys and six-minute observations shall be obtained within 30 minutes.

**(2) EPA Reference Method 9 Certified Observer.**

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

**b. Six-Minute Observations**

Any six-minute observation required by this permit shall be determined by either option listed in Conditions I.A.1.b(1) and (2):

[A.A.C. R18-2-311.b]

**(1) Alternative Method ALT-082 (Digital Camera Operating Technique)**

**(a)** The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

**(b)** The results of all instantaneous surveys and six-minute observations shall be obtained within 30 minutes.

**(2) EPA Reference Method 9.**

**c.** The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all 6-minute Method 9 observations required by this permit are conducted as a 6-minute Alternative Method-082 (Digital Camera Operating Technique) and all instantaneous visual surveys required by this permit are conducted as an instantaneous Alt-082 camera survey. Any 6-minute Method 9 observation required by this permit can be conducted as a 6-minute Alternative Method-082 and any

instantaneous visual survey required by this permit can be conducted as an instantaneous Alt-082 camera survey.

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

2. Monitoring, Recordkeeping, and Reporting Requirements

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

- a. At the frequency specified in the following sections of this permit, the Permittee shall conduct an instantaneous survey of visible emissions from both process stack sources, when in operation, and fugitive dust sources.
- 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.

## II. COMBUSTION TURBINES REQUIREMENTS

### A. Applicability

The requirements under this section are applicable to gas turbines GT-3, GT-4 and GT-5. This section includes NSPS Subpart KKKK requirements for gas turbines with a heat input at peak load equal to or greater than 10 MMBtu/h and that are constructed after February 18, 2005.

[40 CFR 60.4300 & 60.4305(a)]

### B. General Provisions

The following requirements apply to the operation, maintenance, and testing of combustion turbines and associated air pollution control and monitoring systems in accordance with 40 CFR Part 60, Subpart A– General Provisions.

1. The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

2. The Permittee shall submit excess emissions and monitoring systems performance reports and/or summary report forms on a semi-annual basis as required by 40 CFR 60.7(c) and (d).

[40 CFR 60.7(c), (d), & (e)]

3. At all times, including periods of startup, blowdown, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the gas turbines including associated air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating 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, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[40 CFR 60.11(d) & 60.4333(a)]

4. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in 40 CFR Part 60, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[40 CFR 60.11(g)]

5. The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission, which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with opacity

standard or with a standard, which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[40 CFR 60.12]

6. The Permittee shall comply with the “General notification and reporting requirements” listed in 40 CFR 60.19.

[40 CFR 60.19]

**C. Fuel Limitation**

1. The Permittee shall not cause, allow or permit the firing of any fuel other than pipeline quality natural gas in the operation of the gas-fired in the combustion gas turbines.

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

2. Monitoring and Recordkeeping Requirements

The Permittee shall record the monthly consumption of natural gas, in MMBtu, fired in all the compressor gas turbines.

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

**D. Carbon Monoxide**

1. Emission Limitations and Standards

- a. Standards for Solar Taurus 60 Compressors (GT-3 and GT-4)

*The Permittee shall not emit more than 0.12 pounds of carbon monoxide (CO) per MMBtu of fuel combusted from the gas turbine engines.*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Conditions are identified by italics and underlines]

- b. Standards for Solar Titan 250 Compressor (GT-5)

*The Permittee shall not emit more than 0.061 pounds of carbon monoxide (CO) per MMBtu of fuel combusted from the gas turbine engines.*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Conditions are identified by italics and underlines]

2. Performance Testing Requirements

During every permit term the Permittee shall conduct a performance test on the stacks of the gas turbines to determine compliance with CO emission rate in Condition II.D.1. Performance testing will be conducted and data reduced in accordance with EPA Reference Method 10, 40 CFR 60, Appendix A.

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

**E. Nitrogen Oxides (NOx)**

1. Emission Limitations and Standards

- a. Emission Limitation Standard for combustion turbine firing natural gas rated >50 MMBtu/h and ≤ 850 MMBtu/h:

The Permittee shall not cause the natural gas turbine to discharge into the atmosphere any gas which contains NO<sub>x</sub> in excess of 25 ppm at 15% O<sub>2</sub> or 150 ng/J of useful output (1.2 lb/MWh).

[40 CFR 60.4320(a), Table 1 to 40 CFR 60 Subpart KKKK Row 3]

- b. Standards for Solar Taurus 60 Compressors (GT-3 and GT-4)

*The Permittee shall not emit more than 0.106 pounds of nitrogen oxides (NO<sub>x</sub>) per MMBtu of fuel combusted in the gas turbine engines.*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit Conditions are identified by italics and underlines]

- c. Standards for Solar Titan 250 Compressor (GT-5)

*The Permittee shall not emit more than 0.060 pounds of nitrogen oxides (NO<sub>x</sub>) per MMBtu of fuel combusted in the gas turbine engines.*

[A.A.C. R18-2-306.01 and -331.A.3.a]

[Material Permit condition indicated by underline and italics]

2. Performance Testing Requirements

The Permittee must perform annual performance tests in accordance with 40 CFR 60.4400 to demonstrate continuous compliance. If the NO<sub>x</sub> emission results from the performance test is less than or equal to 75 percent of the NO<sub>x</sub> emission limit for the turbine as stated in Condition II.E.1, the Permittee may reduce the frequency of subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test). If the results of any subsequent performance test exceed 75 percent of the NO<sub>x</sub> emission limit for the turbine, the Permittee must resume annual performance tests. Performance testing will be conducted and data reduced in accordance with EPA Reference Method 20, 40 CFR 60, Appendix A.

[40 CFR 60.4340(a)] [A.A.C.R18-2-306.A.3.c and -312]

3. Permit Shield

Compliance with the Conditions of this Part shall be deemed compliance with 40 CFR 60.4320(a) and 40 CFR 60.4340(a).

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

**F. Sulfur Dioxide (SO<sub>2</sub>)**

1. Emission Limitations/Standards

The Permittee shall not burn in the gas turbines GT-3, GT-4 and GT-5 any fuel which contains total sulfur potential emissions in excess of 26 ng SO<sub>2</sub>/J (0.060 lb SO<sub>2</sub>/MMBtu) heat input.

[40 CFR 60.4330(a)(2)]



2. The Permittee shall demonstrate compliance with Condition II.F.1 above by maintaining a copy of a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying the maximum sulfur in the natural gas is 20 grains of sulfur or less per 100 standard cubic feet.

[40 CFR 60.4365(a)]

3. Permit Shield

Compliance with the Conditions of this Part shall be deemed compliance with 40 CFR 60.4330(a)(2) and 40 CFR 60.4365(a).

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

### III. EMERGENCY GENERATOR

#### A. Applicability

The requirements of A.A.C. R18-2-719, Standards of Performance for Existing Stationary Rotating Machinery and NESHAP 40 CFR 63 Subpart ZZZZ are applicable to the Aux. Generator G-1 emergency generator identified in Attachment “C”.

[A.A.C. R18-2-719.A][40 CFR 63.6585]

#### B. Existing Source Requirements

1. Fuel Limitation

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

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

2. Particulate Matter and Opacity

##### a. Emissions Limitations and Standards

- (1) The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from the generator into the atmosphere in excess of the amounts calculated by the following equation:

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

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

Where

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

Q = the heat input in million Btu per hour

- (2) The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the engine smoke for any period greater than 10 consecutive seconds which exceeds 40% opacity. Visible

emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.

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

b. Monitoring and Recordkeeping Requirements

The Permittee shall keep records of fuel supplier certifications documenting the lower heating value of the fuel. These records shall be made available to ADEQ upon request.

[A.A.C. R18-2-306.A.3.c, A.A.C. R18-2-719.I]

c. Permit Shield

Compliance with this Part shall be deemed compliance with A.A.C. R18-2-719.B, A.A.C. R18-2-719.C.1, A.A.C. R18-2-719.I and A.A.C. R18-2-719.E.

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

C. National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements

1. General Operating Limitations/Requirements

a. The Permittee shall operate and maintain at all times the generator, 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 Administrator and 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)]

b. The Permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a 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)]

c. The Permittee shall perform the following on the engine:

[40 CFR 63.6603(a), Item 5 of Table 2d of Subpart ZZZZ]

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

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

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

d. Option of Utilizing Oil Analysis Program

[40 CFR §63.6625(j)]

The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition III.C.1.c(1) above. The oil analysis shall be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters:

- (1) Total Acid Number;
- (2) Viscosity; and
- (3) Percent water content.

The condemning limits for these parameters are as follows:

- (1) Total Acid Number increases by more than 3.0 milligram of potassium hydroxide (KOH) per gram from the Total Acid Number of the oil when new;
- (2) Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
- (3) Percent water content (by volume) is greater than 0.5.

If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 days of receiving the result of the analysis, or before commencing next operation, whichever is later. The Permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, the oil changes for the engine, and replacement of hoses and belts. The analysis program shall be part of the maintenance plan for the engine.

e. The Permittee shall operate the engine according to the following requirements.

[40 CFR 63.6640(f)]

- (1) The Permittee may operate the emergency RICE 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 the engine is limited to no more than 100 hours per year. The Permittee may petition the Administrator and 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 the Federal, State, or local standards require maintenance and testing beyond 100 hours per year. Copies of records shall be made available to ADEQ upon request.

- (2) The Permittee may operate the emergency RICE 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. The engine may not be operated for more than 30 minutes prior to the time when the emergency Condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency Condition is no longer imminent.

- f. 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 Condition III.C.1.c, 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 should 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 must 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), Table 2d, Item 5, Footnote 2]

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

[40 CFR 63.6625(f), A.A.C. R-18-2-331.A.3.c]

[Material Permit Condition identified by underline and italics]

- h. 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)]

## 2. Compliance Demonstration

The Permittee shall demonstrate continuous compliance by operating and maintaining the engine according to the manufacturer's emission-related operation and maintenance instructions; or by developing and following its own 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 63.6640(a), 40 CFR 63 Subpart ZZZZ-Table 6, Item 9]

3. Recordkeeping Requirements

- a. Records required in Condition III.C.2 to show continuous compliance with each operating limitation.  
[40 CFR 63.6655(d)]
- b. Records of the maintenance conducted on the engine in order to demonstrate that the facility operated and maintained the engine and after-treatment control device (if any) according to the Permittee's own maintenance plan.  
[40 CFR 63.6655(e)]
- c. Records of the hours of operation of the engine that is recorded through the non-resettable hour 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)]
- d. The Permittee shall keep records of the parameters that are analyzed and the results of the oil analysis, if any, and the oil changes for the engine.  
[40 CFR 63.6625(i)]

4. Permit Shield

Compliance with the Conditions of this Part shall be deemed compliance with 40 CFR Part 63.6603(a); 6605(b); 63.6625(e), 63.6625(f); 63.6625(h); 63.6625(j); 63.6640(a), 63.6640(f), 63.6655(d), 63.6655(e); 63.6655(f) and Tables 2d and 6 of 40 CFR subpart ZZZZ.

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

**IV. FUEL GAS HEATER**

**A. Applicability**

This Section applies to the fuel gas heater in the Equipment List, Attachment 'C'.

**B. Fuel Limitations**

*The Permittee shall only fire natural gas fuel in the fuel gas heater.*

[A.A.C. R18-2-306.A.2 and -331.A.3.a]

[Material permit Conditions are indicated by underline and italics]

**C. Particulate Matter and Opacity**

1. Emissions Limitations and Standards

- a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from any water heater or boiler into the atmosphere in excess of the amounts calculated by the following equation:

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

Where

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

Q = the heat input in million Btu per hour.

[A.A.C. R18-2-724.C.1]

- b. For purposes of this Section, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. The total heat input of all water heaters and boiler on the plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-724.B]

- c. The Permittee shall not cause, allow or permit the opacity of any plume or effluent from any water heater or boiler to exceed 15 percent.

[A.A.C. R18-2-724.J]

2. Monitoring, Recordkeeping, and Reporting

The Permittee shall keep records of fuel supplier certifications. The certification shall contain information regarding the name of fuel supplier and lower heating value of the fuel. These records shall be made available to ADEQ upon request.

[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 R18-2-724.C.1, and A.A.C R18-2-724.J.

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

**V. GHG AND VOC FUGITIVE EMISSIONS REQUIREMENTS**

**A. Applicability**

The requirements of NSPS Subpart OOOOa, under this Section, are applicable to the Ehrenberg Compressor Station upon installation of the new Solar/Titan 250 compressor and shall become effective upon startup.

[40 CFR 60.5365a(j)] [40 CFR 60.5370a(a)]

**B. General**

At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating 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, opacity observations, review of operating and

maintenance procedures, and inspection of the source. The provisions for exemption from compliance during periods of startup, shutdown and malfunctions provided for in 40 CFR 60.8(c) do not apply to this Section.

[40 CFR 60.5370a(b)]

**C. Definitions**

1. Fugitive emissions component means any component that has the potential to emit fugitive emissions of methane or VOC at a compressor station, including but not limited to valves, connectors, pressure relief devices, open-ended lines, flanges, covers and closed vent systems, compressors, instruments, and meters. Devices that vent as part of normal operations, such as natural gas-driven pneumatic controllers or natural gas-driven pumps, are not fugitive emissions components, insofar as the natural gas discharged from the device's vent is not considered a fugitive emission. Emissions originating from other than the vent, such as the thief hatch on a controlled storage vessel, would be considered fugitive emissions.

[40 CFR 60.5430a]

2. For purposes of this Section V, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 ppm or greater using Method 21.

[40 CFR 60.5397a(a)]

**D. Monitoring Requirements**

1. The Permittee shall develop an emissions monitoring plan that covers the collection of fugitive emissions components at compressor stations within each company-defined area in accordance with Conditions V.D.2 and 3.

[40 CFR 60.5397a(b)]

2. The fugitive emissions monitoring plans shall include, at a minimum, the following elements:

[40 CFR 60.5397a(c)]

- a. The frequency for conducting surveys. Surveys shall be conducted at least as frequently as required by Conditions V.D.5 and 6.
- b. The technique for determining fugitive emissions (i.e., Method 21 at 40 CFR part 60, appendix A-7, or optical gas imaging).
- c. The manufacturer and model number of fugitive emissions detection equipment to be used.
- d. The procedures and timeframes for identifying and repairing fugitive emissions components from which fugitive emissions are detected, including timeframes for fugitive emission components that are unsafe to repair. The Permittee's repair schedule shall meet the requirements of Condition V.D.7 at a minimum.
- e. The procedures and timeframes for verifying fugitive emission component repairs.

- f. Records that will be kept and the length of time records will be kept.
- g. If the Permittee is using optical gas imaging, the plan shall also include the elements specified below:
  - (1) Verification that the optical gas imaging equipment meets the specifications of Conditions V.D.2.g(1)(a) and (b) below. This verification is an initial verification and may either be performed by the facility, by the manufacturer, or by a third party. For the purposes of complying with the fugitives emissions monitoring program with optical gas imaging, a fugitive emission is defined as any visible emissions observed using optical gas imaging.
    - (a) The optical gas imaging equipment shall be capable of imaging gases in the spectral range for the compound of highest concentration in the potential fugitive emissions.
    - (b) The optical gas imaging equipment shall be capable of imaging a gas that is half methane, half propane at a concentration of 10,000 ppm at a flow rate of  $\leq 60$ g/hr from a quarter inch diameter orifice.
  - (2) Procedure for a daily verification check.
  - (3) Procedure for determining the operator's maximum viewing distance from the equipment and how the operator will ensure that this distance is maintained.
  - (4) Procedure for determining maximum wind speed during which monitoring can be performed and how the operator will ensure monitoring occurs only at wind speeds below this threshold.
  - (5) Procedures for conducting surveys, including the items specified below:
    - (a) How the operator will ensure an adequate thermal background is present in order to view potential fugitive emissions.
    - (b) How the operator will deal with adverse monitoring conditions, such as wind.
    - (c) How the operator will deal with interferences (e.g., steam).
  - (6) Training and experience needed prior to performing surveys.
  - (7) Procedures for calibration and maintenance. At a minimum, procedures shall comply with those recommended by the manufacturer.



- h. If the Permittee is using Method 21 of appendix A-7 of 40 CFR 60, the plan shall also include the following elements. For the purposes of complying with the fugitive emissions monitoring program using Method 21, a fugitive emission is defined as an instrument reading of 500 ppm or greater.
- (1) Verification that the monitoring equipment meets the requirements specified in Section 6.0 of Method 21 at 40 CFR part 60, appendix A-7. For purposes of instrument capability, the fugitive emissions definition shall be 500 ppm or greater methane using a FID-based instrument. If the Permittee wishes to use an analyzer other than a FID-based instrument, the Permittee shall develop a site-specific fugitive emission definition that would be equivalent to 500 ppm methane using a FID-based instrument (e.g., 10.6 eV PID with a specified isobutylene concentration as the fugitive emission definition would provide equivalent response to the Permittee's compound of interest).
  - (2) Procedures for conducting surveys. At a minimum, the procedures shall ensure that the surveys comply with the relevant sections of Method 21 at 40 CFR part 60, appendix A-7, including Section 8.3.1.
3. Each fugitive emissions monitoring plan shall include the elements specified in Condition V.D.3.a through d below, at a minimum, as applicable.
- [40 CFR 60.5397a(d)]
- a. A Sitemap.
  - b. A defined observation path that ensures that all fugitive emissions components are within sight of the path. The observation path shall account for interferences.
  - c. If the Permittee is using Method 21, the plan shall also include a list of fugitive emissions components to be monitored and method for determining location of fugitive emissions components to be monitored in the field (e.g. tagging, identification on a process and instrumentation diagram, etc.).
  - d. The plan shall also include the written plan developed for all of the fugitive emission components designated as difficult-to-monitor in accordance with Condition V.D.6.b, and the written plan for fugitive emission components designated as unsafe-to-monitor in accordance with Condition V.D.6.c.
4. Each monitoring survey shall observe each fugitive emissions component, as defined in Condition V.C.1 for fugitive emissions.

[40 CFR 60.5397a(e)]

5. The Permittee shall conduct an initial monitoring survey of the compressor station within 60 days of the modification.

[40 CFR 60.5397a(f)(2)]
6. A monitoring survey of each collection of fugitive emissions components at the compressor station shall be performed at the frequencies specified in Condition V.D.6.a, with the exceptions noted in Conditions V.D.6.b and c.

[40 CFR 60.5397a(g)]

  - a. A monitoring survey of the collection of fugitive emissions components at a compressor station within a company-defined area shall be conducted at least quarterly after the initial survey. Consecutive quarterly monitoring surveys shall be conducted at least 60 days apart.
  - b. Fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface may be designated as difficult-to-monitor. Fugitive emissions components that are designated difficult-to-monitor shall meet the following specification:
    - (1) A written plan shall be developed for all of the fugitive emissions components designated difficult-to-monitor. This written plan shall be incorporated into the fugitive emissions monitoring plan.
    - (2) The plan shall include the identification and location of each fugitive emissions component designated as difficult-to-monitor.
    - (3) The plan shall include an explanation of why each fugitive emissions component designated as difficult-to-monitor is difficult-to-monitor.
    - (4) The plan shall include a schedule for monitoring the difficult-to-monitor fugitive emissions components at least once per calendar year.
  - c. Fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-monitor. Fugitive emissions components that are designated unsafe-to-monitor shall meet the following specifications:
    - (1) A written plan shall be developed for all of the fugitive emissions components designated unsafe-to-monitor. This written plan shall be incorporated into the fugitive emissions monitoring plan.
    - (2) The plan shall include the identification and location of each fugitive emissions component designated as unsafe-to-monitor.

- (3) The plan shall include an explanation of why each fugitive emissions component designated as unsafe-to-monitor is unsafe-to-monitor.
    - (4) The plan shall include a schedule for monitoring the fugitive emissions components designated as unsafe-to-monitor.
7. Each identified source of fugitive emissions shall be repaired or replaced in accordance with Conditions V.D.7.a and b.

[60.5397a(a) and (h)]

  - a. Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions.
  - b. If the repair or replacement is technically infeasible, would require a vent blowdown, a compressor station shutdown, or would be unsafe to repair during operation of the unit, the repair or replacement shall be completed during the next scheduled compressor station shutdown, or within 2 years, whichever is earlier.
  - c. Each repaired or replaced fugitive emissions component shall be resurveyed as soon as practicable, but no later than 30 days after being repaired, to ensure that there are no fugitive emissions.
    - (1) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the Permittee may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging within 30 days of finding such fugitive emissions.
    - (2) For each repair that cannot be made during the monitoring survey when the fugitive emissions are initially found, a digital photograph shall be taken of that component or the component shall be tagged for identification purposes. The digital photograph shall include the date that the photograph was taken, shall clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).
    - (3) The Permittee that uses Method 21 to resurvey the repaired fugitive emissions components, is subject to the following resurvey provisions:
      - (a) A fugitive emissions component is repaired when the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in section 8.3.3 of Method 21 are used.

- (b) The Permittee shall use the Method 21 monitoring requirements specified in Condition V.D.2.h(2), or the alternative screening procedures specified in section 8.3.3 of Method 21.
- (4) The Permittee that uses optical gas imaging to resurvey the repaired fugitive emissions components, is subject to the following resurvey provisions:
  - (a) A fugitive emissions component is repaired when the optical gas imaging instrument shows no indication of visible emissions.
  - (b) The Permittee shall use the optical gas imaging monitoring requirements specified in Condition V.D.2.g.

**E. Recordkeeping Requirements**

For each collection of fugitive emissions components at a compressor station, the Permittee shall maintain records identified in Conditions V.E.1 and 2 below:

[60.5397a(i), 60.5420a(c)(15)]

1. The fugitive emissions monitoring plan as required in Conditions V.D.1 through 3.
2. The records of each monitoring survey as specified below:
  - a. Date of the survey.
  - b. Beginning and end time of the survey.
  - c. Name of operator(s) performing survey. The Permittee shall note the training and experience of the operator.
  - d. Monitoring instrument used.
  - e. When optical gas imaging is used to perform the survey, one or more digital photographs or videos, captured from the optical gas imaging instrument used for conduct of monitoring, of each required monitoring survey being performed. The digital photograph shall include the date the photograph was taken and the latitude and longitude of the collection of fugitive emissions components at a compressor station imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital file, the digital photograph or video may consist of an image of the monitoring survey being performed with a separately operating GPS device within the same digital picture or video, provided the latitude and longitude output of the GPS unit can be clearly read in the digital image.

- f. Fugitive emissions component identification when Method 21 is used to perform the monitoring survey.
- g. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.
- h. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
- i. Documentation of each fugitive emission, including the information specified below:
  - (1) Location.
  - (2) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
  - (3) Number and type of components for which fugitive emissions were detected.
  - (4) Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
  - (5) Instrument reading of each fugitive emissions component that requires repair when Method 21 is used for monitoring.
  - (6) Number and type of fugitive emissions components that were not repaired as required in Condition V.D.7.
  - (7) Number and type of components that were tagged as a result of not being repaired during the monitoring survey when the fugitive emissions were initially found as required in Condition V.D.7.c(2).
  - (8) If a fugitive emissions component is not tagged, a digital photograph or video of each fugitive emissions component that could not be repaired during the monitoring survey when the fugitive emissions were initially found as required in Condition V.D.7.c(2). The digital photograph or video shall clearly identify the location of the component that must be repaired. Any digital photograph or video required under this paragraph can also be used to meet the requirements under Condition V.E.2.e, as long as the photograph or video is taken with the optical gas imaging instrument, includes the date and the latitude and longitude are either imbedded or visible in the picture.
  - (9) Repair methods applied in each attempt to repair the fugitive emissions components.

- (10) Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.
- (11) The date of successful repair of the fugitive emissions component.
- (12) Instrumentation used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.

**F. Compliance Requirements**

1. Initial Compliance Requirements

The Permittee shall determine initial compliance with the fugitive emission standards for each collection of fugitive emissions components at the compressor station in accordance with the requirements in Conditions V.F.1.a through e. The initial compliance period shall begin upon initial startup, and ends no later than 1 year after the initial startup date.

[40 CFR 60.5410a(j)]

- a. The Permittee shall develop a fugitive emissions monitoring plan as required in Conditions V.D.1 through 3.
- b. The Permittee shall conduct an initial monitoring survey as required in Condition V.D.5.
- c. The Permittee shall maintain the records specified in Condition V.E.
- d. The Permittee shall repair each identified source of fugitive emissions for each affected facility as required in Condition V.D.7.
- e. The Permittee shall submit the initial annual report for each collection of fugitive emissions components at the station compressor station as required in Conditions V.G.3 and 4.

2. Continuous Compliance Requirements

To demonstrate continuous compliance, the Permittee shall comply with the requirements in Conditions V.F.2.a through d:

[40 CFR 60.5415a(h)]

- a. The Permittee shall conduct periodic monitoring surveys as required in Condition V.D.6.
- b. The Permittee shall repair or replace each identified source of fugitive emissions as required in Condition V.D.7.
- c. The Permittee shall maintain records as specified in Condition V.E.

- d. The Permittee shall submit the annual report for each collection of fugitive emissions components at the station compressor station as required in Conditions V.G.3 and 4.

**G. Reporting Requirements**

1. Annual reports shall be submitted for each collection of fugitive emissions components at the compressor station. Multiple collection of fugitive emissions components at the compressor station may be included in a single annual report.  
[40 CFR 60.5397a(j)]
2. The initial annual report is due no later than 90 days after the end of the initial compliance period. The initial compliance period shall begin upon the initial startup of the new compressor station, and shall end no later than 1 year after the initial startup date. Subsequent annual reports are due no later than same date each year as the initial annual report.  
[40 CFR 60.5410a and 60.5420a(b)]
3. The report shall include the following general information:  
[40 CFR 60.5420a(b)(1)]
  - a. The company name, facility site name associated with the affected facility, and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.
  - b. An identification of each affected facility being included in the annual report.
  - c. Beginning and ending dates of the reporting period.
  - d. A certification by a certifying 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.
4. For the collection of fugitive emissions components at each compressor station within the company-defined area, the report shall include the records of each monitoring survey including the information specified in Conditions V.G.4.a through I below.  
[40 CFR 60.5420a(b)(7)]
  - a. Date of the survey.
  - b. Beginning and end time of the survey.

- c. Name of operator(s) performing survey. If the survey is performed by optical gas imaging, The Permittee shall note the training and experience of the operator.
  - d. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.
  - e. Monitoring instrument used.
  - f. Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.
  - g. Number and type of components for which fugitive emissions were detected.
  - h. Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h).
  - i. Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.
  - j. The date of successful repair of the fugitive emissions component.
  - k. Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.
  - l. Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.
5. The Permittee shall submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>.) The Permittee shall use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, The Permittee shall submit the report to the Administrator at the appropriate address listed in 40 CFR 60.4. Once the form has been available in CEDRI for at least 90 calendar days, The Permittee shall begin submitting all subsequent reports via CEDRI. The reports shall be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.

[40 CFR 60.5420a(b)(11)]

**H. Permit Shield**

Compliance with Section V of Attachment “B” shall be deemed compliance with 40 CFR 60.5365a(j), 60.5370a(a) and (b), 60.5397a(a) through (j), 60.5410a(j), 60.5415a(h), 60.5420a(b), 60.5420a(b)(1), 60.5420a(b)(7), 60.5420a(c)(15), and 60.5430a.

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



**VI. FUGITIVE DUST REQUIREMENTS**

**A. Applicability**

Section VI 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 the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods to prevent excessive amounts of particulate matter from becoming airborne when crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust.

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

VII. OTHER PERIODIC ACTIVITIES

- (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]  
[A.A.C. R18-2-608]
- (8) 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

Unpaved Roads

*Water, or an equivalent control, shall be used to control visible emissions from unpaved roads.*

[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 VI.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 Section VI shall be deemed compliance with A.A.C. R18-2-604, -605, -606, 607, -608, -614, and -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:

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

- (1) Wet blasting;
- (2) Effective enclosures with necessary dust collecting equipment; or
- (3) Any other method approved by the Director.

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

- a. The date the project was conducted;
- b. The duration of the project; and
- c. Type of control measures employed.

3. Permit Shield

Compliance with Condition VII.A.1.a 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

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.A.C.R18-2-727.B]

(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.

(3) For the purposes of Condition VII.B.1.a(1), 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 VII.B.1.a(2), or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:  
[A.A.C.R18-2-727.C]

(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.

(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 Condition VII.B.1.a(2), 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

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

(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;

VII. OTHER PERIODIC ACTIVITIES

- (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 VII.B.1.b(1).

c. Permit Shield

Compliance with Condition VII.B.1.a 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 Condition VII.B.2.a 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 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 Condition VII.C.1 shall be deemed compliance with A.A.C. R18-2-1101.A.12.



ATTACHMENT "C": EQUIPMENT LIST

ATTACHMENT "C": EQUIPMENT LIST

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	INSTALLATION/ MFG. DATE	EQUIPMENT ID NUMBER	A.A.C. / NSPS / NESHAP
Compressor	29,626 hp	Solar	Titan 250	TBD	2020	GT-5	NSPS Subpart KKKK and OOOOa
Compressor	7,700 hp	Solar	Taurus 60	NA	2008	GT-3	NSPS Subpart KKKK and OOOOa
Compressor	7,700 hp	Solar	Taurus 60	NA	2008	GT-4	NSPS Subpart KKKK and OOOOa
Aux. Generator	1,085 hp	Caterpillar	G3516-130LE	NA	2001	G-1	A.A.C. R18-2-719 and NESHAP Subpart ZZZZ
Fuel Gas Heater	0.88 MMBtu/hr	TBD	TBD	TBD	TBD	TBD	A.A.C. R18-2-724