

EL PASO NATURAL GAS COMPANY, L.L.C. - CASA GRANDE

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1. Introduction

This introduction offers a brief context for the remainder of this permit document. Nothing in this introduction is meant to limit either any applicable provision of law, or any of the operative provisions of the permit as set forth in the subsequent sections of this permit.

This permit is for an existing natural gas fired pipeline compressor station for the transmission of natural gas, owned and operated by El Paso Natural Gas Company, **L.L.C.**, a Delaware Corporation. The facility, commonly known as the Casa Grande Compressor Station, is located on 5495 Green Road, Maricopa, Arizona, upon parcels also identified by State Assessor's Parcel # 501-17-002-B and # 501-17-003. The SIC Code is 4922. The source is situated in an area classified as "non-attainment" for PM10 and PM2.5. The area is classified as "attainment" for all other pollutants.

The existing source includes three natural gas fired turbines ("GE Turbines") each rated at 6050 horsepower at site elevation and 80 degrees Fahrenheit. The turbines are fueled with pipeline quality natural gas, drawn from the Permittee's natural gas pipeline.

Actual operations reflect prevailing market conditions, which may mean the facility could operate at full capacity, or stand idle for protracted periods.

The compressor station was built in the 1950's, and the GE Turbines antedate any installation permit or PSD requirements. The District issued an initial operating permit for the station on June 9, 1993. The compressor station was constructed prior to any NSPS Subpart GG effective date. Prior to the subject revision application, the facility had not been modified. The three existing GE Turbines therefore remain "grand fathered" with respect to the Subpart GG NSPS requirements.

Under the permit a turbine that needs maintenance may be replaced on a "like-kind exchange" basis by an identical or substantially similar "grand fathered" unit (*i.e.* another "existing facility") that has been rebuilt off-site. Permittee will provide the notifications required to preserve such "grand fathered" NSPS status for the GE Turbines. However, preserving "grand fathered" status under the NSPS will not exempt the facility from any case-by-case determination required to determine if such replacement will necessitate review under Code Chapter 3, Article 3, implementing the Prevention of Significant Deterioration (PSD) program as required as a SIP-element under the provisions of 40 CFR §51.166.

Permitting History

- Revision V20607.R01 modified permit V20607.000, issued on December 15, 2000. The revision pertained to the addition of two new simple cycle combustion turbines and a spark-ignition engine-driven emergency generator. It covered installation of two new Centaur 50-simple cycle combustion turbines, each coupled to a centrifugal gas compressor. The turbines are each nominally ISO rated at 4.5 MW shaft power, or 6245 horsepower, at 0 F. The new turbines should exhibit a 15-ppmvd NO_x exhaust concentration, and a 25.0 ppmvd @ 15% O₂ CO concentration.

Revision V20607.R01 also authorized installation and operation of a spark-ignition, piston engine driven emergency generator, whose capacity and emission characteristics are objectively defined in this permit.

The added turbines and the emergency generator are also all fueled with pipeline quality natural gas, drawn from the natural gas pipeline.

Revision V20607.R01 allowed both, the new Solar turbines to operate without limitation. The emergency generator was limited to 1500 hours per year of operation.

Since heat input to the individual Solar turbines will reach 52.44 mmBtu/hr. (LHV), the construction of the newly added turbines triggers Subparts A and GG of the New Source Performance Standards ("NSPS"), 40 CFR §60.1 *et seq.* Those new facilities fall subject to both the 40 CFR §60.332.a.2 standard for NO_x and the 40 CFR §60.333 standard for SO₂.

Available information indicates that maximum potential NO_x emissions from existing GE Turbine units can exceed the 250 tpy threshold that exposes sizeable additional modifications to "PSD review."

To assure that actual operation of the new Solar turbines do not result in actual emissions of NO_x that exceed the 40 TPY "significance" threshold that would trigger such a PSD review requirement, the permit imposes periodic performance testing requirements for NO_x. The frequency of those tests is linked to the demonstrated "margin of safety" relative to the 40 TPY NO_x "significance" value. As explained below, aggregate additional CO emissions only reach about 30% of the CO "significance" value. Give the wide margin of safety, the permit does not impose a testing requirement for CO.

Since the application for the revision V20607.R01 contemplated emission increases, other than NO_x, all fall well below the "significance" thresholds defined in 40 CFR §51.166, the changes under revision V20607.R01 still do not trigger further requirements relevant to the PSD permitting program.

- Revision V20607.R02 changed the horsepower rating of the emergency generator engine from 500 HP to 520 HP. The manufacturer provided data for the 520 HP unit, lists the NO_x emission rate at 2.0 grams/hp-hr and CO emission rate at 1.7 grams/hp-hr. Revision V20607.R02 was based on an operational limitation of 1500 hours per year. This revision constituted a minor permit revision.

- Revision V20643.R01 changed the testing frequency for the Solar Centaur Turbines. Currently, these turbines are required to be tested annually. However, the testing results from these turbines, over the years have shown that the NOX emissions are well below the NOX NSPS limit of 182 ppmvd. Therefore, PCAQCD is authorizing the tests to be performed once every five years as required under Section §6.A.1.b of this permit.

- Renewal V20663.000 added the provisions of 40 CFR 63 Subpart ZZZZ as they apply to the emergency generator, added the opacity provision described in PCAQCD Code 5-23-1010, and moves blow down emissions from insignificant to reportable.

Section 11 of this permit recites a list of emission-generating equipment, other than trivial or insignificant activities, covered under this permit.

This source constitutes a "major source" for NO_x within the meaning of CAA §302(j), which does trigger a requirement for an operating permit under CAA §501 *et seq.* The Technical Support Document for the original permit projects an annual NO_x PTE of 303 TPY; the application for the 'R01 revision acknowledges that the source constitutes a "major emitting source" for NO_x within the meaning of 40 CFR §51.166.

In accord with Department of Transportation requirements, the source includes an Emergency Shut Down System, to allow natural gas to be safely purged to the atmosphere from the gas compressor units and associated piping. Although that system is tested annually, any other operation occurs strictly in response to an emergency condition. This emergency release system does not fall subject to the provisions of the accidental release program under CAA §112(r).

2. Listing of Federally Enforceable Applicable Requirements

[Mandated by 40 CFR §70.5(c)(4)] (Code §§3-1-060.B.2.d, 3-1-081.A.2, 3-1-081.A.8.a)

- A. CAA §§608 & 611 (11/15/90); 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction (9/7/95); regulations pertaining to use and handling of ozone-depleting substances.
- B. In that this facility falls subject to regulation by the Department of Transportation under 49 CFR Part 192, this does not constitute a "stationary source" for purposes of regulation under CAA §112(r) (11/15/90) and 40 CFR Part 68 (1/31/94, amended 6/20/96), which impose requirements pertaining to an accidental release program.
- C. CAA §111 (11/15/90); 40 CFR Part 60, Subparts A and GG (as adopted or revised by the Administrator as of 1/1/96 and locally adopted under Code §6-1-030.1 and 6-1-030.39); NSPS Subpart A General Provisions, Subpart GG Standards of Performance for Stationary Gas Turbines.
- D. The National Emissions Standards for Hazardous Air Pollutants ("NESHAP") 40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines (RICE) §§63.6580 – 63.6675 and Appendices
- E. General Provisions, 40 CFR 63, Subpart A, 40 CFR 63.1-63.15 provisions as listed in Table 8 of 40 CFR 63, Subpart ZZZZ, except as described in 40 CFR 63.6645(a)(5)
- F. Those specific provisions of the Pinal-Gila Counties Air Quality Control District ("PGCAQCD") Regulations, as adopted by the Pinal County Board of Supervisors on March 31, 1975, and approved by the Administrator as elements of the Arizona State Implementation Plan ("SIP") at 43 FR 50531, 50532 (11/15/78), and specifically the following rules:
 - 7-3-1.1 Emission Standards - Particulates - Visible Emissions - General
 - 7-3-1.2. Emission Standards - Particulate Emissions - Fugitive Dust
 - 7-3-1.3 Emission Standards - Particulates - Open Burning
 - 7-3-1.7.F Particulate Emissions - Fuel Burning Equipment
- G. Those specific provisions of the Pinal-Gila Counties Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on June 16, 1980, and approved by the Administrator as elements of the Arizona SIP at 47 FR 15579 (4/12/82), specifically, the following rules:
 - 7-3-1.1 Visible Emissions; General
 - 7-3-1.7.F Fuel Burning Equipment

3. Compliance Certification

- E. Compliance Plan
[Mandated by 40 CFR §70.(5)(c)(8)] (Code §§3-1-081.C, 3-1-083.A.7)

Since the Permittee has certified that it is currently in compliance, the compliance plan consists of continued adherence to the requirements of this permit.

- F. Compliance Schedule
[Mandated by 40 CFR §§ 70.5(c)(8), 70.6(c)(3)] (Code §§3-1-060.B.1, 3-1-083.A.7.c)

Since the Permittee is currently in compliance, no compliance schedule to attain compliance is required.

4. Authority to Construct

- A. Generally - Legacy Facility

Not Applicable with respect to the "legacy facility." (The existing legacy facility covered by this permit, consisting of the GE Turbines, is "grand fathered" with respect to both the "major" and "minor" new source review programs defined under District and EPA regulations. Accordingly, this permit does not need to define the "authority to construct" the facility as currently permitted.)

- B. Minor New Source Review Requirements
[Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP element at 61 FR 15717 (4/9/96)]; Voluntarily Accepted Federally Enforceable Emissions Limitations [Code §3-1-084, approved as a SIP element at 61 FR 15717 (4/9/96)]; Material Permit Condition [Code §3-1-109]

1. NO_x Emission Cap

Aggregate annual NO_x emissions from the Solar Centaur Turbines and the emergency generator shall not exceed 32 tons per year. The following emission and operating limitations will effectively limit maximum actual emissions to less than 100% of that maximum annual NO_x emission value.

2. Emission Limitations

Each of the Solar Turbines Centaur 50 simple cycle turbines shall:

- a. Under steady state operation, produce a maximum NO_x emission concentration of 15.75 ppmvd @ 15% O₂, which equals 105% of the manufacturer's warranted 15 ppmvd NO_x emission rate;
- b. Under steady state operation, produce a maximum CO emission concentration of 26.25 ppmvd @ 15% O₂, which equals 105% of the manufacturer's warranted 25 ppmvd CO emission rate.

3. Emergency Generator

The emergency generator engine shall:

- a. Burn only natural gas;
- b. Be rated at no more than 520HP.

- c. Be of a "lean burn" design with warranted NO_x and CO emission rates not exceeding 3 gr./hp-hr.
- d. Be equipped with an operable hour-meter.
- e. Not be operated for more than 1500 hours in any 12-month period. For purposes of this limitation, compliance shall be assessed on the basis of a 12-month average, rolled monthly.

C. Insignificant Activities
(Code §§1-3-140.74a, 3-1-040.B.2.a.i, 3-1-050)

Apart from the authority of this permit, Permittee is authorized to construct, modify or eliminate "insignificant activities," as defined in Code §1-3-140.74a. Appendix B of this permit includes a non-limiting schedule of specific activities that the District concurs qualify for "insignificant" status.

5. **Emission Limitations**
[Mandated by 40 CFR §70.6(a)(1)] (Code §3-1-081.A.2)

A. Allowable Emissions

- 1. General Limitation
[Code § 3-1-040 (as amended 10/12/95) approved as a SIP Element at 65 FR79742 (12/20/2000)]

Permittee is authorized to discharge or cause to discharge into the atmosphere those emissions of air contaminants as set forth below. Unless exempted under Code §3-1-040.C., or authorized by a separate permit, by this permit or by a revision or operational change allowed under Chapter 3, Article 2 of the Code, Permittee shall not commence construction of, operate or make any modification to this source in a manner which will cause emissions of any regulated air pollutant in excess of the 5.5#/day de minimis amount.

- 2. Insignificant Activities
(Code §§1-3-140.74a, 3-1-040.B.2.a.i, 3-1-050)

Apart from the authority of this permit, Permittee is authorized to construct, modify or eliminate "insignificant activities," as defined in Code §1-3-140.74a. Appendix B of this permit includes a non-limiting schedule of specific activities that the District concurs qualify for "insignificant" status.

B. NSPS Limitation Standard for Nitrogen Oxides
[Code §6-1-030.38 and 40 CFR Part 60, Subpart GG, specifically 40 CFR §60.332]

Permittee shall not discharge or cause to be discharged into the atmosphere from the Solar Centaur stationary gas turbines, any gases which contain nitrogen oxides in excess of the limitations set forth in 40 CFR §60.332. Based on the application-posed heat input/power relationship of 8397 Btu/hp.-hr. or 11.88 kj/watt-hr., the maximum NO_x concentration in the exhaust shall not exceed 182 ppmvd @ 15% O₂.

C. Stationary Turbine Emission Limitation Standard for Sulfur Dioxide
[Code §6-1-030.38 and 40 CFR Part 60, Subpart GG, specifically 40 CFR 60.333]

Permittee shall not discharge or cause to be discharged into the atmosphere from the Solar Centaur gas turbines, any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen on a dry basis, which limit can also be expressed as 15.75 ppmvd @ 15% O₂.

D. Emission Limitation - NO_x Emission Concentration
(§5-24-1030.A.3) (Not federally enforceable.)

Nitrogen oxides shall not be emitted from the turbine(s) at a rate greater than 500 parts per million expressed as NO₂.

E. NESHAP (Subpart ZZZZ) Standards - Stationary Reciprocating Internal Combustion Engines (RICE) NESHAP
[Federally enforceable; 40 CFR 63.6603.a, 63.6605, 63.6625.e, 63.6625.f, 63.6625.h, 63.6625.j, 63.6640.f, 40 CFR Part 63 Subpart ZZZZ Table 2d, Table 6]

Owners and operators of emergency stationary RICE that commenced construction before June 12, 2006 shall comply with the following:
(Emergency Generator)

1. Change the oil and filter every 500 hours of operation or annually, whichever comes first.
or
Conduct an oil analysis every 500 hours of operation or annually, whichever comes first. If the analysis demonstrates that any of the following parameters have been exceeded the oil must be changed within 2 business days of receiving the results or 2 business days before commencing operation of the engine, whichever is later. The oil must be changed if:
Total acid number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new, or;
Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or;
The percent water content (by volume) is greater than 0.5%
2. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
3. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
4. Maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your 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.
5. Install a non-resettable hour meter
6. Minimize the engine's time spent 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.

- a. For the purpose of demonstrating compliance, anytime the emergency engine is under load it will be assumed that the engine is not at idle.
7. Operate the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions
 8. Owners and operators of stationary Internal Combustion Engines (ICE) must limit annual calendar year hours of operation as follows to be considered an emergency stationary ICE.
 - a. Permittee may operate the emergency engine for the purpose of maintenance checks and readiness testing, provided the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or the insurance company associated with the engine. Permittee shall not operate the ICE for the purposes of maintenance checks and readiness testing for more than 100 hours per year unless the Permittee maintains records identifying the Federal, State or local standards that require maintenance and testing of emergency internal combustion engines beyond 100 hours per year. Copies of such records shall be provided to the District upon request.
 - b. Non-emergency operation is limited to 50 hours per calendar year. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance, readiness checks, and demand response operation.
 - c. The 50 hours per calendar year for non-emergency operation cannot be used to supply power to another entity without a separate permit issued by the District.

F. Particulate Emissions Limitations

1. SIP Opacity Limits
[PGCAQCD Reg. 7-3-1.1 (amended 6/16/80) approved as a SIP Element at 47 FR 15579 (4/12/82)]

 The opacity of any plume or effluent shall not be greater than 40 percent as determined by EPA reference Method 9. This requirement applies to the turbines and the emergency generator.
2. Performance Standard Opacity Limit
 (Code §5-23-1010.C)

 No person shall cause, allow or permit to be emitted into the atmosphere from any stationary rotating machinery, 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. This requirement applies to the turbines and the emergency generator.
3. Mass Emissions Limitation

- a. SIP Limitation
[PGCAQCD Reg. 7-3-1.7 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)] [PGCAQCD Reg. 7-3-1.7 (amended 6/16/80) approved as a SIP Element at 47 FR 15579 (4/12/82)]

For equipment with a heat input capacity of less than 4,000 million Btu per hour, particulate emissions shall not exceed:

$Y = 1.02X^{-0.231}$, where Y = allowable rate of emission in pounds per million BTU, and X = maximum equipment capacity rate in million BTU per hour.

- b. Current Code Limitation
 (§5-23-1010)

For equipment with a heat input capacity of 4,200 million Btu per hour or less, particulate emissions shall not exceed:

$E = 1.02Q^{0.769}$, where E = maximum emissions in lbs./hr. for each million BTU per hour heat input, and Q = maximum heat input capacity in million BTU per hour.

4. Particulate Matter Reasonable Precautions
[Currently federally enforceable pursuant to PCAQCD Reg. 4-2-040 (4/27/04) approved as a SIP element at 75 FR 17307]

- a. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, 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, or fill dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- b. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- c. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- d. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- e. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate

matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.

- f. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other material that is tracked out or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits.
- g. Permittee shall not cause, suffer, allow or permit the use, repair, construction or reconstruction of any road or alley without taking every reasonable precaution to effectively prevent fugitive dust from becoming airborne.

5. **Surface Stabilization [Federally enforceable pursuant to Code §4-1-030 (10/28/15) approved as a SIP element at 82 FR 20267 (5/1/17)]**

- a. Permittee shall not cause or allow visible fugitive dust emissions from open areas / vacant lots (areas not being utilized for an activity) to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.
- b. Permittee shall erect barriers or no trespassing signs upon evidence of trespass on open areas / vacant lots.
- c. Permittee shall stabilize any open area / vacant lot greater than 1.0 acre that has 0.5 acre or more of disturbed surface and sign up for the Pinal County Dust Control forecast within 30 days of discovery. The open area / vacant lot shall be stabilized the day leading up to and the day that is forecast to be high risk for dust emissions.
- d. Permittee shall not remove vegetation from open areas / vacant lots without applying dust suppressants before and during the weed abatement. Track out onto paved surfaces must be prevented or eliminated and dust suppressants must be applied following weed abatement to stabilize the entire surface.
- e. Stabilization of open areas / vacant lots is determined by the drop ball, threshold friction velocity, flat vegetation or standing vegetation methods listed in PCAQCD Code 4-9-320.
- f. Permittee shall not cause or allow visible fugitive dust emissions from unpaved lots (areas being utilized for an activity) greater than 5000 square feet to exceed 20% opacity based on EPA Method 9 or the continuous plume or intermittent plume methods listed in PCAQCD Code §4-9-340.
- g. Permittee shall not allow silt loading equal to or greater than 0.33 oz/ft² or allow the silt content to exceed 8% on unpaved lots greater than 5000 square feet.
- h. Permittee shall stabilize unpaved lots greater than 5000 square feet by paving, applying a dust suppressant or graveling.

- i. Permittee shall clean up track out on a paved public roadway that exceeds 50 feet within 24 hours of discovery and limit opacity to 20% or less while using a rotary brush or broom.
- j. Permittee shall make a record of the control measures applied.

G. Fuel Sulfur Limitations

1. NSPS Limitation
(40 CFR 60.333.b, Code §6-1-030)

In the Solar Centaur turbines, the Permittee is allowed to burn only pipeline quality natural gas having a sulfur content of 0.8% or less.

2. Local Limitation
(§§5-23-1020.B, 5-24-1030.A.2)

In all the turbines, the Permittee is allowed to burn only pipeline quality natural gas having a sulfur content of 0.8% by weight or less.

H. General Maintenance Obligation

(Code §§3-1-081.A.2, 3-1-081.A.8.a, 3-1-081.E.2, 3-1-081.E.1., approved as Title V permit program elements 61 FR 55910 (10/30/96); also see ARS §§49-481(A), 49-487(B))

At all times, including periods of start-up, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate the permitted facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

I. Additional Plant-Wide Requirements

1. Asbestos NESHAP Compliance
[40 CFR §61.145] (Code §§7-1-030.A.8, 7-1-060)

Permittee shall comply with Code §§7-1-030.A.8 and 7-1-060 and 40 CFR Part 61, Subpart M, as applicable, when conducting any renovation or demolition activities at the facility.

2. Stratospheric Ozone and Climate Protection
[40 CFR Part 82 Subpart F] (Code §§1-3-140.15, 1-3-140.58.k)

The permittee shall comply with the applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

3. Sandblasting
(Code §5-4-160.)

a. Permittee shall conduct all abrasive blasting in a confined enclosure unless either of the following occurs, in which case the blasting can be unconfined and in compliance with subsection b. below:

- i. The item to be blasted exceeds 8 ft in any one dimension; or,

- ii. The surface being blasted is fixed in a permanent location, cannot be easily moved into a confined enclosure, and the surface is not normally dismantled or moved prior to abrasive blasting.
- b. If unconfined blasting is conducted as allowed by subsection as., Permittee shall use at least one of the following control measures:
 - i. Vacuum collection system.
 - ii. Wet abrasive blasting.
 - iii. Hydroblasting.
 - iv. California Air Resources Board (CARB) approved low dust producing abrasives.
 - v. A control measure that is determined by the Control Officer to be equally effective to control particulate matter emissions.
- 4. Architectural Coatings
(Code §5-12-370)
Permittee shall not employ, apply, evaporate or dry any architectural coating, as defined in §5-12-370.C, for industrial or commercial purposes, material containing photochemically reactive solvent as defined in §5-9-280 or shall thin or dilute any architectural coating with a photochemically reactive solvent.
- 5. Other Spray Painting
(Code §5-13-390)
Permittee shall conduct spray painting operations except architectural coatings in an enclosed area designed to contain not less than 96% by weight of the overspray. An enclosed area means a 3-sided structure with walls a minimum of 8 feet high.
- 6. Disposal
(Codes §5-12-370 and 5-13-390)
Permittee shall not, during any one day, dispose of a total of more than one and one-half gallons of any photochemically reactive solvent or of any material containing more than one and one-half gallons of any such photochemically reactive solvent by any means which will permit the evaporation of such solvent into the atmosphere.

6. Compliance Demonstration

[Mandated by 40 CFR §70.6(c)] (Code §§3-1-060.b.2.d, 3-1-081.A.2, 3-1-083)

A. Monitoring and Testing

[Mandated by 40 CFR §70.6(a)(3)] (Code §3-1-083)

1. Performance Testing

[§§3-7-590, 3-3-103 and 3-1-050.A] (§§5-24-1030.A.3, 3-1-083)

To demonstrate compliance with applicable limitations, permittee shall run performance tests on the respective turbine units, as required below.

a. Performance Test Schedule - GE Turbines

i. Reoccurring Tests

Subsequent testing for any specific turbine unit shall be conducted at the earliest date required by the following scenarios:

1. If a turbine is replaced, a performance test shall be conducted by the earlier of one-hundred and eighty (180) days after that turbine commences continuous operation, or twenty-four (24) months after replacement.
2. A turbine unit shall be re-tested not later than five (5) years after the preceding performance test.
3. If the facility is not in operation at the time a subsequent performance comes due, Permittee shall provide notice of that situation to the Control Officer and shall conduct a performance test within 60 days after the facility resumes operation.

b. NSPS Performance Test Schedule - Solar Centaur Turbines

i. NSPS Performance Test

Permittee shall conduct performance tests on each Solar Centaur turbine, for the purpose of verifying actual NO_x emission rates, at least once during current permit term and within five (5) years of the preceding performance test.

ii. Test Notice

At least fourteen (14) days before the NSPS performance test date, the Permittee shall notify PCAQCD by sending written notice to Director, Pinal County Air Quality Control, P.O. Box 987, Florence, AZ 85132

c. Performance Test Mechanics

- i. Performance tests shall be conducted in accordance with a District-approved test plan which shall be submitted at least sixty (60) days (or such other time as the Control Officer may approve in writing) prior to the scheduled test date.
- ii. Performance tests shall be conducted with appropriate prior written notice to the District, which notice shall be not less than five (5) working days;
- iii. Performance tests shall be conducted at the maximum practical load possible;
- iv. Performance tests shall be conducted using the reference methods and procedures set forth in 40 CFR Part 60, Appendix A; or such other

alternative reference methods and procedures as the EPA Administrator may approve in writing, provided copies of any such alternative and such Administrator-approval shall be included in the test plan submitted to the District.

- v. If the facility is not in operation at the time a subsequent performance test comes due, Permittee shall provide notice of that situation to the Control Officer and shall conduct a performance test within 60 days after the facility resumes operation.

d. Performance Test Report

Copies of the test report shall be submitted to the District within forty-five (45) days after the test.

2. Parametric Emission Monitoring - Fuel Use

[Currently federally enforceable pursuant to PCAQCD Code 3-1-103 (2/22/95) approved as a SIP element at 65 FR79742]

- a. Permittee shall maintain a record accurately reflecting the aggregate quantity of fuel burned in turbine units during each calendar month.
- b. Permittee shall maintain a record accurately reflecting the volume of gas vented during each blow down and shall report the associated emissions as part of the emission inventory.

3. NSPS Fuel Sulfur Monitoring

[40 CFR §60.334.b; Code §6-1-030]

Permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the Solar turbine if such fuel meets the definition of natural gas in 40 CFR 60.331(u). Permittee shall use one of the following sources of information to make the required demonstration:

- a. The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
- b. Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to 40 CFR part 75.

4. Opacity Monitoring

[Code §3-3-260.]

a. Turbine Emissions

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on each turbine stack. If visible emission are observed, Permittee

shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days.

5. Compliance Verification - Voluntarily Accepted Federally Enforceable Emissions Limitations

[Code §3-1-084, approved as a SIP element at 61 FR 15717 (4/9/96)]

- a. Permittee shall maintain an operating hour log reflecting use of the emergency generator.
- b. On a calendar-month basis, Permittee shall make a record of operating hours for the emergency generator, recalculate the total operating hours over the preceding twelve calendar months, and assess whether the emergency generator use conformed to the use-limitations of this permit.

6. Emergency Generator Records

[Federally enforceable; 40 CFR 63.6655]

Permittee shall:

- a. Record the number of hours the engine operated for non-emergency and emergency situations and document what classified the operation as emergency.
- b. Keep records of maintenance conducted consistent with the manufacturer's instructions and documentation from the manufacturer that the engine is certified to meet the applicable emission standards
- c. Keep records of malfunctions, actions taken to minimize emissions and corrective actions.

B. Recordkeeping

[Mandated by 40 CFR §70.6(a)(3)] Code §3-1-083)

1. Recordkeeping protocol

- a. Permittee shall maintain required records in a permanent form, which may either written or electronic form, provided that written copies of electronic records shall be provided as required under this permit, or as requested by the District. Within the meaning of this provision, an electronic record is "permanent" if at any time during the required record retention period, it can printed out as hard copy.
- b. Permittee shall maintain the records either at the permitted facility, or, provided all records remain accessible as otherwise required under this permit.

2. Additional Recordkeeping Requirements

In addition to any records required under the monitoring provisions of this permit, Permittee shall:

- a. To the extent required by any express provision of this permit, maintain at the source, or such other location as may be expressly allowed under this permit, a file of all measurements, including performance- testing measurements; and all other information required pursuant to any provision of this permit, recorded in a permanent form suitable for inspection.
- b. Permittee shall maintain records of the occurrence and duration of any malfunction or period of excess emissions in the operation of the permitted facility or any air pollution control equipment. Copies of records which are maintained at a remote site shall be transmitted at least annually to the location mandated in Section 6.B.1.b. of this permit.

7. Other Reporting Obligations

- A. Deviation Reporting Requirements
[Mandated by 40 CFR §§70.6(a)(3)(iii)(B)] (Code §3-1-083.A.5.b)

Permittee shall report any deviation from the requirements of this permit along with the probable cause for such deviation, and any corrective actions or preventative measures taken to the District within ten days of when the Permittee received notice, actual or constructive, of the deviation.

- B. Regular Compliance Reporting
[Mandated by 40 CFR §70.6(a)(3)] (Code §3-1-083.A.3.a)

Permittee shall submit a semi-annual report containing a summary of the information required to be recorded pursuant to this permit, which summary shall clearly show whether or not Permittee has complied with the operational requirements and emissions limitations under this permit. All instances of deviations from permit requirements shall be clearly identified in such reports. For brevity, such deviation reports may incorporate by reference any written supplemental upset reports or excess emission notifications filed by Permittee during the reporting period. The report shall be submitted to the District within 30 days after the end of each calendar half. Appendix A of this permit is a form which may be used for the report.

- C. Reporting Operational Changes; Like-kind Exchanges
[Code §6-1-030.1, §3-2-180 and 40 CFR §60.7(a)(4)]

When a turbine is replaced by another turbine that constitutes an "existing facility" within the meaning of 40 CFR 60.14(e)(6), Permittee shall:

1. Notify the District seven days prior to the change or no later than three days after the change if prior notice is not possible;
2. Include certification that the replacement turbine has not been reconstructed as defined by 40 CFR 60.15(b);
3. Include the serial number of the replacement turbine; and
4. Provide notice for a re-testing as required under ¶6.A.1.a.ii.

- D. Regular Compliance/Compliance Progress Certification
[Mandated by 40 CFR §70.6(c)(5)] (Code §3-1-083.A.4)

Permittee shall annually submit a certification of compliance with the provisions of this permit. The certification shall be separately submitted to both the District and to the Enforcement Office (AIR 5), EPA Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901. The certification shall:

1. Be signed by a responsible official, as defined in Code §3-1-030.18;
2. Identify each term or condition of the permit that is the basis of the certification;
3. State the compliance status with respect to each such term or condition;
4. State whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Identify the method(s) used for determining the compliance status of the source, currently and over the reporting period; and
6. Be postmarked within thirty (30) days of the start of each calendar year.

- E. Annual Emissions Inventory
[Code §§3-1-103, 3-7-590.C.1.]

Permittee shall complete and submit to the District an annual emissions inventory disclosing actual emissions for the preceding calendar year. The submittal shall be made on a form provided by the District. The inventory is due by the latter of March 31, or ninety (90) days after the form is furnished by the District.

8. Fee Payment
[Mandated by 40 CFR §§70.6(a)(7), 70.9] (Code §3-1-081.A.9)

As an essential term of this permit, an annual permit fee shall be assessed by the District and paid by Permittee in accord with the provisions of Code Chapter 3, Article 7 generally, and Code §3-1-081.A.9 specifically. The annual permit fee shall be due on or before the anniversary date of the issuance of an individual permit, or formal grant of approval to operate under a general permit. The District will notify the Permittee of the amount to be due, as well as the specific date on which the fee is due.

9. General Conditions

- A. Term
[Mandated by 40 CFR §70.6(a)(2)] (Code §3-1-089)

This permit shall have a term of five (5) years, measured from the date of issuance.

- B. Basic Obligation
[Mandated by 40 CFR §§70.4(b)(15), 70.6(a)(6)(i), 70.6(a)(6)(ii), 70.7.b] (Code §3-1-081.)

1. The owner or operator ("Permittee") of the facilities shall operate them in compliance with all conditions of this permit, the Pinal County Air Quality Control District ("the District") Code of Regulations ("Code"), and consistent with all State and Federal laws, statutes, and codes relating to air quality that apply to these facilities. Any permit

noncompliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application and may additionally constitute a violation of the Clean Air Act (1990).

2. All equipment, facilities, and systems used to achieve compliance with the terms and conditions of this permit shall at all times be maintained and operated in good working order.
3. 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.

C. Duty to Supplement Application
[Mandated by 40 CFR §§70.5(b), 70.6(a)(6)(v)] (Code §3-1-081.A.8.e.)

Permittee shall furnish to the District within a reasonable time, which shall not exceed thirty days unless the Control Officer fixes some other time period for response, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking, reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required under this permit. For information claimed to be confidential, Permittee shall submit along with the requested information or records a showing as required under Code §3-1-120, and shall separately submit a full duplicate copy to the EPA Regional Office (Regional Administrator c/o Air Division Permits Office, EPA Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901).

D. Right to Enter
[Mandated by 40 CFR §70.6(c)(2)] (Code §§ 3-1-083.A.6, 3-1-132)

Authorized representatives of the District shall, upon presentation of proper credentials and while observing reasonable standard safety requirements as set forth by the owner or operator of the source, be allowed for purposes of ascertaining compliance with this permit and with other applicable requirements:

1. To enter upon the premises where the source is located, where emissions-related activity is conducted, or in which any records are required to be kept under the terms and conditions of this permit;
2. To inspect, during normal business hours or while the source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
3. To sample or monitor emissions from the source, or other substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements;
4. To have access to and copy, at reasonable times, any records that are required to be kept under the terms of this permit; and
5. To record any inspection by use of written, electronic, magnetic and photographic media.

E. Transfer of Ownership
[Mandated by 40 CFR §70.7(d)(4)] (Code §3-1-090)

This permit may be transferred under an administrative permit amendment from one person to another by notifying the District at least 30 days in advance of the transfer. The notice shall contain all the information and items required by Code § 3-1-090. The transfer may take place if not denied by the District within 10 days of the receipt of the transfer notification.

F. Posting of Permit
(Code §3-1-100)

Permittee shall firmly affix the permit, an approved facsimile of the permit, or other approved identification bearing the permit number, upon such building, structure, facility or installation for which the permit was issued. In the event that such building, structure, facility or installation is so constructed or operated that the permit cannot be so placed, the permit shall be mounted so as to be clearly visible in an accessible place within a reasonable distance of the equipment or maintained readily available at all times on the operating premises.

G. Permit Revocation for Cause
[Mandated by 40 CFR §70.6(a)(6)(iii)] (Code §3-1-140)

The Director of the District ("Director") may issue a notice of intent to revoke this permit for cause pursuant to Code §3-1-140, which cause shall include occurrence of any of the following:

1. The Director has reasonable cause to believe that the permit was obtained by fraud or material misrepresentation;
2. Permittee failed to disclose a material fact required by the permit application form or a regulation applicable to the permit;
3. The terms and conditions of the permit have been or are being violated.

H. Certification of Truth, Accuracy, and Completeness
[Mandated by 40 CFR §§70.5(a)(2), 70.6(a)(3)(iii)(B)] [Code §§3-1-083.A.5, 3-1-175 (as amended 10/12/95) approved as SIP Elements at 61 FR 15717 (4/9/96)]

Any application form, report, or compliance certification submitted pursuant to the Code shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 3 of the Code shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

I. Renewal of Permit
[Mandated by 40 CFR §§70.5(a)(1)(iii), 70.7(c)] (Code §3-1-050.C.2)

Expiration of this permit will terminate the facility's right to operate unless either a timely application for renewal has been submitted in accordance with §§3-1-050, 3-1-055 and 3-1-060, or a substitute application for a general permit under §3-5-490. For Class I permit renewals, a timely application is one that is submitted at least 6 months, but not greater than 18 months prior to the date of the permit expiration. For Class II or Class III permit renewals, a timely application is one that is submitted at least 3 months, but not greater than 12 months prior to the date of permit expiration.

J. Severability
[Mandated by 40 CFR §70.6(a)(5)] (Code §3-1-081.A.7)

Pursuant to Code § 3-1-081.A.7., the provisions of this permit are severable, and if any provision of this permit is held invalid the remainder of this permit shall not be affected thereby.

K. Permit Shield
[Mandated by 40 CFR §70.6(f)] (Code § 3-1-102.)

1. Generally

Subject to the following schedule of exclusions, compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit.

The permit-shield exclusions include:

- a. PGCAQCD Rule §7-2-1.8 ANTI-DEGRADATION;
- b. PGCAQCD Rule §7-3-1.3 OPEN BURNING;
- c. PGCAQCD Rule §7-3-4.1 INDUSTRIAL - CARBON MONOXIDE EMISSIONS.

2. Additional Inclusions Under the Permit Shield

The permit shield also extends to the following provisions of the code, due to a finding by the Control Officer of non-applicability:

- a. Code §§5-22-950, 5-22-960 & 5-22-970, all dealing with Fossil Fuel-Fired Steam Generators.

L. Permit Revisions
[Mandated by 40 CFR §70.7(d), 70.7(e)] (Code Chapter 3, Article 2, specifically Code §3-1-081.A.8.c)

1. This permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
2. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.

M. Permit Re-opening
[Mandated by 40 CFR §§70.6(a)(6)(iii), 70.7(f), 70.7(g)] (Code §3-1-087.)

1. This permit shall be reopened if:
 - a. Additional applicable requirements under the Clean Air Act (1990) become applicable to this source, and on that date this permit has a remaining term of three or more years. However, no such reopening under this subparagraph is required if the effective date of the newly applicable requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to Code §3-1-089.C.

- b. The Control Officer determines that it contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of it;
- c. The Control Officer determines that it needs to be revised or revoked to assure compliance with the applicable requirements; or
- d. The EPA Administrator finds that cause exists to terminate, modify, or revoke and reissue this permit.

2. If this permit must be reopened or revised, the District will notify the permittee in accord with Code §3-1-087.A.3.

N. Record Retention

[Mandated by 40 CFR §70.6(a)(3)(ii)(B)] (Code §3-1-083.A.2.b)

Permittee shall retain for a period of five (5) years all documents required under this permit, including reports, monitoring data, support information, calibration and maintenance records, and all original recordings or physical records of required continuous monitoring instrumentation.

O. Scope of License Conferred

[Mandated by 40 CFR §70.6(a)(6)(iv)] (Code §3-1-081.A.8.d)

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

P. Excess Emission Reports; Emergency Provision

[Mandated by 40 CFR §70.6(g)] (Code §3-1-081.E, Code §8-1-030, A.R.S. §49-514(P))

1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall reported as follows:
 - a. The permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts:
 - i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.
 - ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.
 - b. The excess emissions report shall contain the following information:
 - i. The identity of each stack or other emission point where the excess emissions occurred.
 - ii. The magnitude of the excess emissions expressed in the units of the applicable limitation.

- iii. The time and duration or expected duration of the excess emissions.
 - iv. The identity of the equipment from which the excess emissions occurred.
 - v. The nature and cause of such emissions.
 - vi. 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.
 - vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.
 - viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.
2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires 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.
 3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.
 4. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Control Officer by certified mail or hand delivery within 2 working days of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

10. Provisions Specifically Designated as Not Federally Enforceable
(Code §3-1-081.B.2)

Subject to the following specific exclusions, all terms and conditions of this permit are enforceable by the Administrator and citizens under the Clean Air Act. The exclusions include:

- | | | |
|----|-----------------|-----------------------------------------------------------------|
| A. | Section 1. | Introduction |
| B. | Section 4.C | Authority to Construct; Insignificant Activities |
| C. | Section 5.D | Emission Limitation - NO _x Emission Concentration |
| D. | Section 5.F.2 | Opacity performance standard |
| E. | Section 5.F.4.b | Mass Emissions Limitation; Current Code Limitation (§5-23-1010) |
| F. | Section 5.G.2 | Fuel Use Limitations |
| G. | Section 9.F | Posting of Permit |

11. Equipment Schedule
[Mandated by 40 CFR §70.5(c)(3)(iii)] (Code §3-1-040.A)

Equipment for which emissions are allowed by this permit are as follows:

1. GE Frame 3 Turbine - Model 3712R, Serial # 95028, 6050 HP at site elevation at 80 °F.
2. GE Frame 3 Turbine - Model 3712R, Serial # 95052, 6050 HP at site elevation at 80 °F.
3. GE Frame 3 Turbine - Model 3712R, Serial # 95054, 6050 HP at site elevation at 80 °F.
4. Solar Turbines International Centaur (C-01) 50 Turbine, Serial #CC3018, 6245 hp. @ 0 °F.
5. Solar Turbines International Centaur 50 Turbine, Serial #CC3019, 6245 hp. @ 0 °F.
6. Waukesha natural gas emergency generator engine, Serial # C-14994/1, 520 hp. Maximum, installation year 2003.

Appendix A

Semi-annual Report

Permit V20687.000

Abstract

This constitutes a semi-annual report of all required monitoring, documenting emissions during the subject reporting period.

Reporting Period - January-June __ Or July-December __ Year _____

Facility - El Paso Natural Gas Company, L.L.C.
Casa Grande Compressor Station
5459 Green Road, Maricopa, AZ

Parametric Emissions Report

Natural gas burned during reporting period _____ SCF or Therms

“A” Plant
“B” Plant
”C” Plant

NOTE: This represents the total natural gas usage by the turbines, emergency generator and small space heaters. The “A” plant consists of 2 “GE” turbines, the “B” plant consists of 1”GE” turbine and the “C” plant consists of 2 “Solar” turbines and the emergency generator.

Natural gas vented during blow downs..... _____ scf

Operations Report

Was the maintenance performed on the generator as required under §5.E? YES / NO

Has testing been completed on the turbines within the last 60 months or as otherwise required by §6.A?
..... YES / NO

Have the fuel sulfur monitoring and recordkeeping requirements of §6.A.3 been met? YES / NO

Have the opacity screenings required under §6.A.4 been conducted? YES / NO

Have the generator records required under §6.A.5 and §6.A.6 been maintained? YES / NO

Do those records show compliance with the generator-use limits of §4.B.3 and §5.E?..... YES / NO

Have records been maintained as required under §6.B?..... YES / NO

Were any deviations recorded and if so were they reported as required under §7.A YES / NO

On a separate sheet, describe and explain any previously un-reported deviations from the terms of this permit. Is such a supplemental disclosure attached? YES / NO

On a separate sheet, describe and explain any monitoring activity or recordkeeping that occurred with respect to the Asbestos NESHAP or Stratospheric Ozone requirements respectively defined in §§5.I.1 and 5.I.2 of the permit during the reporting period. Is such a supplemental disclosure attached?YES / NO

Certification by Responsible Official

I certify that, based on information and belief formed after reasonable inquiry, that the statements and information in this report are true, accurate and complete.

Signed _____

Printed Name _____

Title _____

Date _____

Contact Phone Number _____

Mail to - Pinal County Air Quality Control District
P.O. Box 987
Florence, AZ 85132

Appendix B: Insignificant Activities

- A. General information (Code §§ 1-3-140.74A, 3-1-050, & 3-3-081)
1. An insignificant is one which accounts for less than 1 percent of a source's emissions of conventional air pollutants or generates less than 200 pounds per year of regulated air pollutants. Additionally, an activity specifically listed as such in the Code is insignificant.
 2. Permit application need not provide emissions data regarding insignificant activities and such activities need not be listed in the permit. Insignificant activities need only be listed in the permit application.
- B. Non-exclusive list of insignificant activities.

Activities which may generate emissions in insignificant amounts include but are not limited to the following:

1. Short term maintenance activities including but not limited to:
 - a. Steam cleaning
 - b. Equipment removal and replacement
2. Operation of Oil/Water Systems/Scrubber Liquid Systems
3. Operation of cooling water, plant water, wastewater, and other water systems.
4. Emissions from testing and sampling.
5. Emissions from oil systems and tanks.
6. Cathodic Protection System
7. Operation of battery systems
8. Operation of natural gas-fired appliances rated less than 1 mmbtu/hr.
9. Operation of vents, valves, and flanges.
10. Diesel and fuel oil storage tanks with capacity of 40,000 gallons or less, and lubricating oil storage tanks with capacity of 40,000 gallons or less and vapor pressure less than 1.5psia.
11. Normal landscaping, building maintenance or janitorial activities.