

Filename: S:\Word\PERMITS\TSDs\El Paso Natural Gas (Orace)\V20683.tsd  
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Date: 6/8/20

**Technical Support Document  
Title V Permit  
El Paso Natural Gas Company – Oracle Compressor Station  
Permit # V20683.000**

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**1. Applicant / Application History**

El Paso Natural Gas Company, L.L.C.  
5151 East Broadway, Suite 1680  
Tucson, AZ 85711

**2. Disclaimer**

The provisions of this technical support document merely provide background information with respect to the underlying permit. The provisions of this document are not intended to enlarge, limit or modify the provisions of the permit.

**3. Agency Authority**

Under ARS §49-479 *et seq.*, Pinal County has adopted a "unitary" permit program that regulates both the construction and operation of stationary sources of air pollution. The Pinal County Air Quality Control District ("PCAQCD") constitutes the administrative branch of County government that administers the program.

Under Clean Air Act ("CAA") §110 and 40 CFR §51.166, the EPA has approved the pre-construction review aspects of Pinal County's attainment-area permitting program, such that PCAQCD has the primary authority to issue, administer and enforce pre-construction permits as required under the Prevention of Significant Deterioration (PSD) provisions of the CAA.

Under CAA §501 *et seq.* and 40 CFR Part 70, the EPA has granted interim approval for the "operating permit," aspects of PCAQCD's unitary permitting program that affect major sources, such that Pinal County has the primary authority to issue, administer and enforce permits required under the Title V provisions of the CAA.

**3. Attainment Classification**

This facility is located in an area currently in attainment for all pollutants. The San Manuel SO<sub>2</sub> non-attainment area was redesignated to attainment in January 2008 with the submittal of an approved maintenance plan.

**4. Permitting History**

The following is a list of permits issued to this facility since the original Title V:

Permit/Revision	Type	Issuance	Permit Changes
V20608.000	Title V	7/31/00	New Title V permit; Conversion to simple cycle.
V20608.R01	Revision	8/17/01	Install Compressor Wheel as alternative scenario.
V20622.000	Renewal	5/26/05	Updated NSPS 40 CFR Part 60 Subpart GG requirements and insignificant activities list
V20641.000	Renewal	8/13/10	Updated applicable requirements for opacity, sandblasting, architectural coatings and other spray painting and testing schedules
V20664.000	Renewal	7/30/15	
V20683.000	Renewal	5/26/20	

**6. Compliance/Enforcement History**

The last inspection of this facility was conducted in June of 2018. The facility was in compliance. The last performance test for NOx emissions was conducted in February of 2014. Results indicate that NOx emissions are at approximately 65% of the NSPS limitation of 0.0150 percent by volume.

This facility does not have any history of compliance problems or enforcement.

**7. Project Description**

This is a permit renewal for the Title V permit at the Oracle Compressor Station. No facility changes are being processed during this renewal, but there are some changes to the permit. This technical support document only summarizes any changes made to the permit through this renewal. For more in-depth discussion on this permit see the TSDs for previous revisions of this permit.

The Oracle compressor station was built in 1971. That antedates any construction-permit requirements under either the Clean Air Act, Arizona statutes, or local rules. The source includes a natural gas fired turbine rated at 10,300 horsepower at 80° F. The turbine is fueled with pipeline quality natural gas, drawn from the natural gas pipeline.

Also, the source is allowed to operate a 170 kW natural gas emergency generator. The small generator at the facility could qualify, under District regulations, an insignificant activity. However, the continued "insignificance" would hinge upon actual usage; the definition limits operation to 72 hours per year. Rather than run the risk of inadvertently violating the "insignificance" ceiling, the Permittee has elected to voluntarily accept a limit on generator operation, allowing up to 100 hours of operation per year as required by NESHAP, 40 CFR 63 Subpart ZZZZ, for Stationary Reciprocating Internal Combustion Engines. There is no operational limitation during emergency operation.

**8. Permit Changes**

**8.1 RICE NESHAP**

Emergency generator is subject to The National Emissions Standards for Hazardous Air Pollutants ("NESHAP") 40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines (RICE) provisions.

**8.2 Insignificant Activities**

Natural gas blow down emissions, created when venting natural gas remaining in isolated piping, equipment or valves to the ambient air, are removed from the list of insignificant activities and included in reportable emissions

**9. Emissions**

**9.1 Actual Emissions (2018) in Tons per Year**

<b>NOx</b>	<b>CO</b>	<b>VOC</b>	<b>SO2</b>	<b>PM10</b>	<b>PM2.5</b>	<b>HAPs</b>
137.91	0.24	1.48	1.11	2.16	2.16	0.24

9.2 Potential to Emit (PTE) Emissions (tons per year)

Emissions Unit	NOx	CO	VOC	SO2	PM10	PM2.5	Formaldehyde	HAPs
<b>GE Unit</b>	236.5	13.1	1.1	1.9	3.6	3.6	0.39	0.56
<b>Waukesha Generator</b>	3.5	6.2	0.35	0.0001	0.005	0.005	0.012	0.019
<b>Blow downs</b>	0	0	2.39	0	0	0	0	0.13
<b>TOTAL</b>	240	19.3	3.84	1.9	3.6	3.6	0.40	0.71

**10. Ambient Impact Assessment**

No Ambient Impact Assessment has been conducted for this renewal since there has been no change to the emission units.

**11. List of Common Abbreviations**

AP-42 .....  
 “Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources”, 5<sup>th</sup> Edition  
 CAA ..... Clean Air Act  
 CAM..... Compliance Assurance Monitoring  
 CFR ..... Code of Federal Regulations  
 CO ..... Carbon Monoxide  
 hr ..... Hour  
 kW ..... kilowatts  
 lb..... Pound  
 MACT ..... Maximum Achievable Control Technology  
 MMBTU..... Million British Thermal Units  
 Mod. .... Modification  
 MSDS ..... Material Safety Data Sheet  
 NOX ..... Nitrogen Oxides  
 NSPS ..... New Source Performance Standard  
 NSR ..... New Source Review  
 PCAQCD..... Pinal County Air Quality Control District  
 PGCAQCD..... Pinal-Gila Counties Air Quality Control District  
 PM10 ..... Particulate Matter nominally less than 10 Micrometers  
 PSD ..... Prevention of Significant Deterioration  
 SIC ..... Standard Industrial Code  
 SIP ..... State Implementation Plan  
 SOX ..... Sulfur Dioxide  
 tpy..... tons per year  
 TSD ..... Technical Support Document  
 VOC ..... Volatile Organic Compound  
 yr ..... year