Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007-2935
(602) 771-2300 • www.adeq.state.az.us

Stephen A. Owens
Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

AQD:PS:CTS:85853

April 21, 2004

Ed Sanchez, Flagstaff Operation Area Manager
El Paso Natural Gas Company
P.O. Box 1087
Colorado Springs, CO 80901-9906

COPY

Dear Mr. Sanchez:

Subject: Air Quality Permit No. 28161
Compressor Station Facility - Place ID: 2130

The Arizona Department of Environmental Quality has received payment of the fee requested. Enclosed is a permit for the referenced facility. In accordance with Arizona Revised Statutes, §49-430, this permit should be readily available at all times on the premises.

The permit is issued for a period of five years. Please keep us informed of any changes that would affect your air pollution status during the period of this permit.

You are advised that a permit is a legally enforceable document. If your facility fails to comply with the provisions contained in its permit, you will be subject to enforcement action and could incur civil fines of up to ten thousand dollars per day under A.R.S. §49-463 and/or be subject to criminal penalties in accordance with A.R.S. §49-464.

If you have any questions, please contact Trevor Baggiore at (602) 771-2321.

Sincerely,

Nancy C. Wrona, Director
Air Quality Division

NCW:tb4

Enclosures

cc: Anu Pundari, EPNG
Emmanuelle Rapicavoli, EPA, Region IX

Arizona Department of Environmental Quality
Air Quality Division

Excess Emissions Report

Arizona Administrative Code R18-2-310.C requires:

Excess emissions shall be reported as follows:

1. *The owner or operator of any source issued a permit shall report to the Director any emissions in excess of the limits established by this Chapter or the applicable permit. Such report shall be in two parts as specified below:*
   a. *Notification by telephone or facsimile within 24 hours of the time when the owner or operator first learned of the occurrence of excess emissions including all available information from paragraph (2) of this subsection.*
   b. *Detailed written notification within 72 hours of the notification pursuant to subparagraph (a) of this paragraph.*

2. *The excess emissions report shall contain the following information:*
   a. *The identity of each stack or other emission point where the excess emissions occurred.*
   b. *The 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.*
   c. *The time and duration or expected duration of the excess emissions.*
   d. *The identity of the equipment from which the excess emissions emanated.*
   e. *The nature and cause of such emissions.*
   f. *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.*
   g. *The steps that were or are being taken to limit the excess emissions. If the source's permit contains procedures governing source operation during periods of start-up or malfunction and the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures.*

Company/Facility Name: El Paso Natural Gas Company / Seligman Compressor Station

2. Permit No.: 28161

3. Report Date: ____/____/____

4. Identity of the stack or other emission point where the excess emissions occurred: _____

5. The identity of the process equipment from which the excess emissions originated: _____

6. Magnitude and specific pollutant of the excess emissions expressed in units of the applicable emissions limitation:

7. Operating data and actual calculations used in determining the magnitude of the excess emissions: ____

Date and Time the Excess Emission event began: ____/____/____ ___:___

Date and Time the Excess Emission event ceased: ____/____/____ ___:___

Duration or expected duration of excess emissions: Days _____ Hours _____ Minutes

9. The nature and cause of the excess emissions: _____

_____

_____

10. If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken to prevent the recurrence of such malfunctions: _____

_____

_____

_____

11. The steps that were or are being taken to limit the excess emissions. If the source's permit contains procedures governing source operations during periods of start-up or malfunction and the excess emissions resulted from start-up or malfunction; a list of the steps taken to comply with the permit procedures: _____

_____

_____

_____

_____

_____

_____

_____

Certification of Truth, Accuracy, and Completeness

By my signature; I, _____, hereby certify that based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Signature of responsible official: _____ Date: ____/____/____

Instructions for completing the Excess Emission Report form

1. **Company Name:** The name of your company and the name of the facility if applicable as it appears on your current ADEQ/AQD operating permit.
2. **Permit No.:** Your current ADEQ/AQD operating permit number.
3. **Report Date:** The date on which this report was completed.
4. **Identity of the stack or other emission point where the excess emissions occurred:**
   A textual description of the stack that the excess emissions were, or are being emitted from. This description may include the stack ID number as designated on your most recent Emissions Inventory submittal.
5. **The identity of the process equipment from which the excess emissions originated:**
   A description of the point of origin of the pollutant emitted in excess. This may include the point ID number from your most recent Emissions Inventory submittal.
6. **Magnitude of the excess emissions expressed in units of the applicable emissions limitation:**
   for example; 60% Opacity, 0.899 lbs/MM Btu, 6.5 lbs/ton feed.
7. **Operating data and calculations used in determining the magnitude of the excess emissions:**
   If surrogate parameters are used to determine emission rates then a description of these surrogate parameters, the emissions factors used to convert them to emission rates, and the equations used to calculate the emissions. A surrogate parameter could be something like combustion chamber temperature used, with the proper factors and equations, to calculate NO_2 emissions.
8. **Date and Time the Excess Emission event began:**
   When the excess emissions started.

   Date and Time the Excess Emission event ceased:
   When the excess emissions stopped.

   Duration or expected duration of excess emissions:
   How long the excess emissions occurred or if the excess emissions are occurring at the time of the report or are anticipated to occur, the estimated length of time the excess emissions will continue.

   The nature and cause of the excess emissions:
   A comprehensive description of the reason why the excess emission occurred.
10. **If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken to prevent the recurrence of such malfunctions:**
    What actions were taken to stop the excess emissions and what actions were or are being taken to prevent this type of emission from occurring again.
11. **The steps that were or are being taken to limit the excess emissions. If the source's permit contains procedures governing source operations during periods of start-up or malfunction and the excess emissions resulted from start-up or malfunction; a list of the steps taken to comply with the permit procedures:**
    What steps are or were being taken to limit, reduce, or control excess emissions until resumption of normal operation. What was done to comply with permit conditions covering such occurrences.

Filing Instructions

This completed form may be used to satisfy the requirements of A.A.C. R18-2-310.C.1.b by faxing it, within 24 hours of the time when the owner or operator first learned of the occurrence of excess emissions, to:

(602) 771-4251
ATTN: Steve Burr, Compliance Section, Technical Services Unit

This completed and **signed** form may be used to satisfy the requirements of A.A.C. R18-2-310.C.1.b by certifying it with an original signature and **mailing** it, within 72 hours of the initial notification of A.A.C. R18-2-310.C.1.b, to:

Arizona Department of Environmental Quality
Air Quality Division
Compliance Section, Technical Services Unit
1110 West Washington Street, 3415A-3
Phoenix, Arizona 85007-2935

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY CONTROL
PERMIT NUMBER 27898

Has been issued to El Paso Natural Gas Company

9 Miles East of Seligman AZ on Crookton Road

Seligman, AZ 85337

For operation of **Pipeline transmission of natural gas**

Subject to terms and conditions therein and all applicable Arizona Revised Statutes and the Arizona Administrative Code.

Number: 28161

Issued: April 21, 2004

Expires: April 21, 2009

Nancy C. Wrona, Director, Air Quality Division

TO BE FRAMED AND DISPLAYED IN A CONSPICUOUS PLACE

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
Air Quality Division
1110 West Washington Street • Phoenix, AZ 85007-2935 • Phone: (602) 771-2316

AIR QUALITY CONTROL PERMIT

(As required by Title 49, Chapter 3, Article 2, Section 49-426, Arizona Revised Statutes)

This air quality control permit does not relieve applicant of responsibility for meeting all air pollution regulations

1. PERMIT TO BE ISSUED TO (Business license name of organization that is to receive permit)

El Paso Natural Gas Company

2. NAME (OR NAMES) OF OWNER OR PRINCIPALS DOING BUSINESS AS THE ABOVE ORGANIZATION

El Paso Natural Gas Company

3. MAILING ADDRESS *P.O. Box 1087*
NUMBER STREET

Colorado Springs, CO 80901-9906
CITY OR COMMUNITY STATE ZIP CODE

4. ORIGINAL EQUIPMENT LOCATION/ADDRESS *9 miles East of Seligman, AZ on Crookton Road*
NUMBER STREET

Seligman, Yavapai County, Arizona 85337
CITY OR COMMUNITY COUNTY STATE ZIP CODE

5. FACILITIES OR EQUIPMENT DESCRIPTION *Natural Gas Pipeline Compressor Station*

6. THIS PERMIT ISSUED SUBJECT TO THE FOLLOWING *Conditions contained in Attachments "A" and "B"*

7. ADEQ PERMIT NUMBER _____ PERMIT CLASS *I* EXPIRATION DATE April 21, 2009

PERMIT ISSUED THIS 21st DAY OF April, *2004*

SIGNATURE

Nancy C. Wrona, Director, Air Quality Division
TITLE

ADEQ/AQD/P100D (9-93)

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY CLASS I, TITLE V PERMIT

COMPANY:	*El Paso Natural Gas Company*
FACILITY:	*Seligman Compressor Station*
PERMIT #:	*28161*
DATE ISSUED:	April 21, 2004
EXPIRY DATE:	April 21, 2009

SUMMARY

This Class I, Title V operating permit renewal is issued to El Paso Natural Gas Company (EPNG), the Permittee, for operation of its Seligman Compressor Station located 9 miles east of Seligman on Crookton Road in Yavapai County, Arizona.

EPNG provides natural gas transportation services for natural gas suppliers and end users throughout the southwestern United States, and owns and operates a large natural gas pipeline network. The Seligman Compressor Station is one of several such stations that provide natural gas compression to the pipeline network. Compression is needed to maintain enough pressure in the pipeline to keep the natural gas flowing, and is accomplished at the Seligman Compressor Station by two natural gas-fired turbine engines, one General Electric MS3962G and one Solar Mars 100-T150000S, each driving a compressor unit. Primary electric power for the facility is from an electrical generator attached to each turbine. When the turbines are not operating, electric power is purchased. A 276 horsepower Generac auxiliary generator is used when power cannot be obtained from either of the two sources. The facility is permitted to operate 24 hours a day and 365 days a year. This facility has been automated and therefore, is an unattended station. All records relating to this permit will be kept at the EPNG's Flagstaff Complex Office located at 3920 East El Paso Drive in Flagstaff, Arizona 86004.

This permit is issued in accordance with Title 49, Chapter 3 of the Arizona Revised Statutes. 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. All terms and conditions in this permit are enforceable by the Administrator of the U.S. Environmental Protection Agency.

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I. PERMIT EXPIRATION AND RENEWAL

[ARS § 49-426.F, A.A.C. R18-2-304.C.2, and -306.A.1]

A. This permit is valid for a period of five years from the date of issuance.

B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months, prior to the date of permit expiration.

II. COMPLIANCE WITH PERMIT CONDITIONS

[A.A.C. R18-2-306.A.8.a and b]

A. The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona air quality statutes and air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or 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.

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.

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

[A.A.C. R18-2-306.A.8.c, -321.A.1, and -321.A.2]

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.

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 an application for renewal has been submitted 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.

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.

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.

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

C. Proceedings to reopen and reissue 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 reopenings 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.

IV. POSTING OF PERMIT [A.A.C. R18-2-315]

A. The Permittee shall post this permit or a certificate of permit issuance where the facility is located in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:

1. Current permit number; or

2. Serial number or other equipment 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.

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

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

VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE [A.A.C. R18-2-327.A and B]

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

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.

VII. COMPLIANCE CERTIFICATION [A.A.C. R18-2-309.2.a, -309.2.c-d, and -309.5.d]

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

The compliance certifications shall include the following:

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

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, and whether the methods or other means provide continuous or intermittent data;

3. The status of compliance with the terms and conditions of this permit for the period covered by the certification, based on the methods or means designated in Condition VII.A.2 above. The certifications shall identify each deviation and take it into account for consideration in the compliance certification;

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;

5. All instances of deviations from permit requirements reported pursuant to Condition XII.B of this Attachment; and

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

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

C. If any outstanding compliance schedule exists, a progress report shall be submitted with the semi-annual compliance certifications required in Condition VII.A above.

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

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

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.

IX. INSPECTION AND ENTRY [A.A.C. R18-2-309.4]

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;

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD [A.A.C. R18-2-304.C]

If this source becomes subject to a standard promulgated by the Administrator pursuant to Section 112(d) of the Act, then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

XI. ACCIDENTAL RELEASE PROGRAM [40 CFR Part 68]

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.

XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting [A.A.C. R18-2-310.01.A and -310.01.B]

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 XII.A.1.b below.

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

b. The report shall contain the following information:

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

(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;

(3) Date, time and duration, or expected duration, of the excess emissions;

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

(5) Nature and cause of such emissions;

(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; and

(7) Steps taken to limit the excess emissions. If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures.

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

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

B. Permit Deviations Reporting [A.A.C. R18-2-306.A.5.b]

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. Prompt reporting shall mean that the report was submitted to the Director by certified mail, facsimile, or hand delivery within two working days of the time the deviation occurred.

C. Emergency Provision [A.A.C. R18-2-306.E]

1. An "emergency" means any situation arising from sudden and reasonable 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.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if Condition XII.C.3 is met.

3. 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 being properly operated at the time;

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

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.

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

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

D. Compliance Schedule [ARS § 49-426.I.5]

For any excess emission or permit deviation that cannot be corrected with 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.

E. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown [A.A.C. R18-2-310]

1. Applicability

This rule 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;

b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;

c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;

d. Contained in A.A.C. R18-2-715.F; or

e. Included in a permit to meet the requirements of A.A.C. R18-2-406.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. 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;

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;

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;

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;

e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

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;

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;

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

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

3. *Affirmative Defense for Startup and Shutdown*

a. Except as provided in Condition XII.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:

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

(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;

(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;

(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;

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

(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;

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

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

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 XII.E.2 above.

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 XII.E.2 above.

5. *Demonstration of Reasonable and Practicable Measures*

For an affirmative defense under Condition XII.E.2 or XII.E.3 above, the Permittee shall demonstrate, through submission of the data and information

required by Condition XII.E and A.A.C. R18-2-310.01, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

XIII. RECORD KEEPING REQUIREMENTS [A.A.C. R18-2-306.A.4]

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

1. The date, place as defined in the permit, and time of sampling or measurements;
2. The date(s) analyses were performed;
3. The name of the company or entity that performed the analyses;
4. A description of the analytical techniques or methods used;
5. The results of such analyses; and
6. The operating conditions as existing at the time of sampling or measurement.

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

C. All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

XIV. REPORTING REQUIREMENTS [A.A.C. R18-2-306.A.5.a]

The Permittee shall submit the following reports:

A. Compliance certifications in accordance with Section VII of Attachment "A".

B. Excess emission, permit deviation, and emergency reports in accordance with Section XII of Attachment "A".

C. Other reports required by any condition of Attachment "B".

XV. DUTY TO PROVIDE INFORMATION [A.A.C. R18-2-304.G and -306.A.8.e]

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.

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.

XVI. PERMIT AMENDMENT OR REVISION

[A.A.C. R18-2-318, -319, and -320]

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 XVII, as follows:

A. Administrative Permit Amendment (A.A.C. R18-2-318);

B. Minor Permit Revision (A.A.C. R18-2-319); and

C. Significant Permit Revision (A.A.C. R18-2-320).

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

XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION

[A.A.C. R18-2-306.A.4 and -317]

A. The Permittee may make changes at the permitted source 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(19);

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;

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

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

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.

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 XVII.A and XVII.C of this Attachment.

C. For each change under Conditions XVII.A and XVII.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.

D. Each notification shall include:

1. When the proposed change will occur;
2. A description of the change;
3. Any change in emissions of regulated air pollutants; and
4. Any permit term or condition that is no longer applicable as a result of the change.

E. The permit shield described in A.A.C. R18-2-325 shall not apply to any change made to Conditions XVII.A and XVII.B above.

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.

G. Notwithstanding any other part of this Section, 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 this Section over the term of the permit, do not satisfy Condition XVII.A above.

XVIII. TESTING REQUIREMENTS [A.A.C. R18-2-312]

A. The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.

B. **Operational Conditions During Testing**

Tests shall be conducted during operation at the maximum possible capacity of each unit under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed at a lower rate. Operations during periods of

start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.

C. 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.

D. **Test Plan**

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the Director in accordance with A.A.C. R18-2-312.B and the Arizona Testing Manual. This test plan must include the following:

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:

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.

G. **Report of Final Test Results**

A written report of the results of all performance tests shall be submitted to the Director within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

XIX. PROPERTY RIGHTS [A.A.C. R18-2-306.A.8.d]

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

XX. SEVERABILITY CLAUSE [A.A.C. R18-2-306.A.7]

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.

XXI. PERMIT SHIELD [A.A.C. R18-2-325]

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

XXII. PROTECTION OF STRATOSPHERIC OZONE [40 CFR Part 82]

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

XXIII. APPLICABILITY OF NSPS GENERAL PROVISIONS [40 CFR Part 60]

For all equipment subject to a New Source Performance Standard, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 of the Code of Federal Regulations.

ATTACHMENT "B": SPECIFIC CONDITIONS

Air Quality Control Permit No. 28161
for
El Paso Natural Gas, Seligman Compressor Station

I. FACILITY WIDE REQUIREMENTS

A. The Permittee shall have on site or on call a person that is certified in EPA Reference Method 9. [A.A.C. R18-2-306.A.3.c]

B. At the time the compliance certifications required by Section VII of Attachment "A" are submitted, the Permittee shall submit reports of all monitoring activities required by Attachment "B" performed during the six month compliance term. [A.A.C. R18-2-306.A.5.a]

C. Upon request by ADEQ staff, the Permittee shall provide logs of all emission related maintenance activities performed on the emission units. [A.A.C. R18-2-306.A.3.c]

II. GAS TURBINE ENGINES AND AUXILIARY GENERATOR

A. Applicability

This section applies to all gas turbine engines and the auxiliary generator.

B. Operating Limitations

1. Lean Head End Liners

[A.A.C. R18-2-306.A.2, -306.01, -331.A.3.e, and Condition I.A.6 of Attachment "B" of Significant Revision 1001570 to Operating Permit 1000158]

[Material permit conditions are identified by underlines and italics]

The Permittee shall operate and maintain *GE Lean Head End Liners to reduce NO_x emissions from the General Electric gas turbine engine*.

2. Catalytic Converter [A.A.C. R18-2-306.A.2, -306.01, -331.A.3.e]

[Material permit conditions are identified by underlines and italics]

The Permittee shall operate and maintain *a catalytic converter to reduce CO emissions from the auxiliary generator*.

3. Hours Limitation

[A.A.C. R18-2-306.A.2, -306.01, -331.A.3.a, and Condition I.E.5 of Attachment "B" of Minor Revision 27427 to Operating Permit 1000158]

[Material permit conditions are identified by underlines and italics]

The Permittee shall limit the hours of operation of the auxiliary generator to not more than 600 hours for any consecutive twelve (12) month period.

4. Fuel Limitation

The Permittee shall only combust pipeline quality natural gas as the fuel in the gas turbine engines and auxiliary generator. [A.A.C. R18-2-306.A.2]

5. Monitoring and Recordkeeping Requirements

[A.A.C. R18-2-306.A.3 and -306.A.4]

a. The Permittee shall maintain records of the monthly hours of operation of the auxiliary generator.

b. The Permittee shall recalculate a rolling twelve (12) month total for the auxiliary generator at the end of each month.

C. General Electric MS3962G Gas Turbine Engine and Auxiliary Generator

1. Particulate Matter and Opacity

a. Emissions Limitations/Standards

(1) The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the gas turbine engine or auxiliary generator smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity, measured in accordance with the Arizona Testing Manual, Reference Method 9. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. [A.A.C. R18-2-719.E]

(2) The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from the gas turbine engine, the auxiliary generator, or from any other stationary rotating equipment having a heat input rate of 4200 million Btu per hour or less, in excess of the amounts calculated by the following equation:

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

where:

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

Q = the heat input in million BTU per hour.

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

(3) For the purposes of Condition II.C.1.a(2) above, the heat unit shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. Compliance tests shall be conducted during operation at the normal rated capacity of each unit. The total heat input of all operating gas turbine units and the auxiliary generator on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

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

b. Monitoring and Recordkeeping Requirements

(1) A certified EPA Reference Method 9 observer shall conduct a quarterly survey of visible emissions emanating from the stack of the gas turbine engine. If the turbine is not in operation at the time the quarterly survey of visible emissions is conducted, the Permittee does not have to set the turbine in operation to conduct the survey. Instead, the Permittee can document that the unit was not operating

During the visible emissions survey, if the opacity of the emissions observed appears to exceed the standard, then the observer shall conduct a certified EPA Reference Method 9 observation. The Permittee shall keep records of the name of observer, date, time and results of the survey and observation. [A.A.C. R18-2-306.A.3.c]

(2) A certified EPA Reference Method 9 observer shall conduct a quarterly survey of visible emissions emanating from the stack of the auxiliary generator. If the auxiliary generator is not in operation at the time the quarterly survey of visible emissions is conducted, the Permittee does not have to set the auxiliary generator in operation to conduct the survey. Instead the Permittee can document that the unit was not operating.

During the visible survey, if the opacity of the emissions observed appears to exceed the standard, then the observer shall conduct a certified EPA Reference Method 9 observation. The Permittee shall keep records of the name of observer, date, time and results of the survey and observation. [A.A.C. R18-2-306.A.3.c]

(3) The Permittee shall monitor the lower heating value of the fuel being combusted in the gas turbine engine and the auxiliary generator. Compliance with this requirement may be demonstrated by maintaining a copy of that part of the Federal Energy Regulatory Commission (FERC)-approved Tariff agreement that limits transmission of pipeline quality natural gas to having a heating value greater than or equal to 967 Btu/ft^3. [A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-719.I]

c. Permit Shield

Compliance with the conditions of 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.E and A.A.C. R18-2-719.I. [A.A.C. R18-2-325]

2. Nitrogen Oxides

a. NO_x Limitations

(1) *The Permittee shall not allow NO_x emissions to exceed 40.5 lb/hr from the General Electric gas turbine engine.*

[A.A.C. R18-2-306.A.2, -306.01, -331.A.3.a and Condition I.A.5.a of Attachment "B" of Significant Revision 1001570 to Operating Permit 1000158]

[Material permit conditions are identified by underlines and italics]

(2) *The Permittee shall not allow NO_x emissions from the auxiliary generator to exceed 7.3 lb/hr.*

[A.A.C. R18-2-306.A.2, -306.01, -331.A.3.a and Condition I.E.1 of Attachment "B" of Minor Revision 27427 to Operating Permit 1000158]

[Material permit conditions are identified by underlines and italics]

b. Testing Requirements

(1) The Permittee shall perform an annual performance test for NO_x emissions from the gas turbine engine to determine compliance with the limit specified in Condition II.C.2.a(1) above.

(2) The Permittee shall conduct a performance test for NO_x emissions from the auxiliary generator once per permit term to determine compliance with the limit specified in Condition II.C.2.a(2) above.

(3) The Permittee shall use EPA Reference Method 20 to determine NO_x emissions from the gas turbine engine.

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

(4) The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A to the Director in any test plan for approval by the Director.

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

c. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with Condition I.A.5.a of Attachment "B" of Significant Revision 1001570 to Operating Permit 1000158 and Condition I.E.1 of Attachment "B" of Minor Revision 27427 to Operating Permit 1000158. [A.A.C. R18-2-325]

3. Carbon Monoxide

Testing Requirements

a. A performance test for CO shall be conducted on the GE gas turbine engine once per permit term.

b. The Permittee shall use EPA Reference Method 10 to determine CO emissions.

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

c. The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A to the Director in any test plan for approval by the Director. [A.A.C. R18-2-312.B]

4. Sulfur Dioxide

a. Emissions Limitation/Standard

The sulfur content of the natural gas being fired in the gas turbine engine and the auxiliary generator shall not exceed 0.8 percent by weight.

[A.A.C. R18-2-719.J and Condition I.A.4 of Attachment "B" of Operating Permit #1000158]

b. Monitoring and Recordkeeping Requirements

The Permittee shall monitor the sulfur content of the fuel being combusted in the gas turbine engine and the auxiliary generator. Compliance with this requirement may be demonstrated by maintaining a copy of that part of the Federal Energy Regulatory Commission (FERC)-approved Tariff agreement that limits transmission of pipeline quality natural gas to sulfur content less than 0.8 percent by weight. [A.A.C. R18-2-306.A.3.c and A.A.C. R18-2-719.I]

c. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-719.I, A.A.C. R18-2-719.J and Condition I.A.4 of Attachment "B" of Operating Permit #1000158.

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

D. Solar Mars 100 Gas Turbine

1. Nitrogen Oxides [40 CFR 60.332(a)(2) and 40 CFR 60.332(c)]

a. Emission Limitation/Standard

(1) The Permittee shall not cause to be discharged into the atmosphere from the stack of the gas turbine engine any gases which contain nitrogen oxide in excess of that calculated from the following equation:

$$STD = 0.0150\frac{(14.4)}{Y} + F$$

where:

STD = allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis)

Y = Manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO_x emission allowance for fuel-bound nitrogen as defined in 40 CFR 60.332(a)(3).

(2) *The Permittee shall not allow NO_x emissions to exceed 10.5 lb/hr from the Solar gas turbine engine.*

[A.A.C. R18-2-306.A.2, -306.01, -331.A.3.a and Condition I.D.1.b of Attachment "B" of Significant Revision 1001570 to Operating Permit 1000158]

[Material permit conditions are identified by underlines and italics]

b. Performance Testing Requirement

The Permittee shall perform an annual performance test for nitrogen oxide to determine compliance with the limits specified in II.D.1.a above. The Permittee shall follow the procedures outlined in 40 CFR 60.335 for this performance test. The Permittee shall use EPA Reference Method 20 to determine NO_x emissions.

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

c. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with 40 CFR 60.332(a)(2) and Condition I.D.1.b of Attachment "B" of Significant Revision 1001570 to Operating Permit 1000158. [A.A.C. R18-2-325]

2. Carbon Monoxide

Testing Requirements

a. A performance test for CO shall be conducted on the gas turbine engine once per permit term.

b. The Permittee shall use EPA Reference Method 10 to determine CO emissions.

c. The Permittee may submit an alternate and equivalent test method(s) that is listed in 40 CFR Subpart 60, Appendix A to the Director in any test plan for approval by the Director. [A.A.C. R18-2-312.B]

3. Sulfur Dioxide

a. Emission Limitation/Standard

The Permittee shall not burn in the gas turbine engine natural gas which contains sulfur in excess of 0.8 percent by weight.
[40 CFR 60.333(b)]

b. Monitoring and Recordkeeping Requirements

(1) The Permittee shall comply with the following custom fuel sulfur monitoring schedule to demonstrate compliance with the fuel sulfur requirements of 40 CFR 60.334(b)(2):

(a) The Permittee shall monitor sulfur content in the natural gas fuel being fired in the turbine at least once every six months.

(b) Should any sulfur analysis as required in Condition II.D.2.b(1)(a) above indicate noncompliance with 40 CFR 60.333, the Permittee shall notify the Director and Administrator of such excess emissions and the custom schedule shall be re-examined. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined. [40 CFR 60.334(b)]

(2) Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM; the reference methods for the measurement of sulfur in gaseous fuels; or an approved alternative method. The reference methods are ASTM D1072-80, ASTM D3031-81, ASTM D3246-81 and ASTM D4084-82. [40 CFR 60.335(d)]

c. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with 40 CFR 60.333(b), 40 CFR 60.334(b) and 40 CFR 60.335(d). [A.A.C. R18-2-325]

III. NONPOINT SOURCE REQUIREMENTS

A. Applicability

This section applies to any source of air contaminants which, due to lack of an identifiable emissions point or plume, cannot be considered a point source.

B. **Particulate Matter and Opacity**

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

a. Emission Limitations/Standards

(1) Opacity of emissions from any nonpoint source shall not be greater than 40% measured in accordance with the Arizona Testing Manual, Reference Method 9. [A.A.C. R18-2-612]

(2) The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:

(a) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, 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]

(b) Keep dust to a minimum from driveways, parking areas, and vacant lots 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]

(c) 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 is repaired, constructed, or reconstructed; [A.A.C. R18-2-605.A]

(d) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust; [A.A.C. R18-2-605.B]

(e) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, handling, or conveying material likely to give rise to airborne dust; [A.A.C. R18-2-606]

(f) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored; [A.A.C. R18-2-607.A]

(g) 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; [A.A.C. R18-2-607.B]

(h) Any other method as proposed by the Permittee and approved by the Director. [A.A.C. R18-2-306.A.3.c]

b. Monitoring and Recordkeeping Requirements

(2) The Permittee shall maintain records of the dates on which any of the activities listed in Conditions III.B.1.a(2)(a) through III.B.1.a(2)(h) above were performed and the control measures that were adopted. [A.A.C. R18-2-306.A.3.c]

(2) Opacity Monitoring Requirements

(a) A certified Method 9 observer shall conduct a quarterly visual survey of visible emissions from the non-point sources. The Permittee shall keep a record of the name of the observer, the date on which the observation was made, and the results of the observation.

(b) If the observer sees a plume from a non-point source that on an instantaneous basis appears to exceed 40%, then the observer shall, if practicable, take a six-minute Method 9 observation of the plume.

i. If the six-minute opacity of the plume is less than 40%, the observer shall make a record of the following:

a) Location, date, and time of the observation; and

b) The results of the Method 9 observation.

ii. If the six-minute opacity of the plume exceeds 40%, then the Permittee shall do the following:

a) Adjust or repair the controls or equipment to reduce opacity to below 40%; and

b) Report it as an excess emission under Section XII.A of Attachment "A". [A.A.C. R18-2-306.A.3.c]

c. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-604.A, A.A.C. R18-2-604.B, A.A.C. R18-2-605, A.A.C. R18-2-606, A.A.C. R18-2-607, and A.A.C. R18-2-612. [A.A.C. R18-2-325]

2. Open Burning

a. Emission Limitation/Standard

Except as provided in A.A.C. R18-2-602.C(1), C(3), and C(4), and except when permitted to do so by either ADEQ or the local officer delegated the authority for issuance of open burning permits, the Permittee shall not conduct open burning. [A.A.C. R18-2-602]

b. Monitoring and Recordkeeping Requirement

Compliance with the monitoring requirements for Section III.B.2.a above may be demonstrated by maintaining copies of all open burning permits on file. [A.A.C. R18-2-306.A.3.c]

c. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-602. [A.A.C. R18-2-325]

IV. MOBILE SOURCE REQUIREMENTS

A. Applicability

The requirements of this condition are applicable to mobile sources which either move while emitting air contaminants or are frequently moved during the course of their utilization but are not classified as motor vehicles, agricultural vehicles, or are agricultural equipment used in normal farm operations. Mobile sources shall not include portable sources as defined in A.A.C. R18-2-101.88. [A.A.C.R18-2-801]

B. Particulate Matter and Opacity

1. Emission Limitations/Standards

a. Off-Road Machinery

The Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any off-road machinery, smoke for any period

greater than ten consecutive seconds, the opacity of which exceeds 40 percent. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. Off-road machinery shall include trucks, graders, scrapers, rollers, and other construction and mining machinery not normally driven on a completed public roadway. [A.A.C.R18-2-802.A]

b. Roadway and Site Cleaning Machinery

(1) The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period greater than ten consecutive seconds, the opacity of which exceeds 40 percent. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes. [A.A.C.R18-2-804.A]

(2) The Permittee shall take reasonable precautions, such as the use of dust suppressants, before the cleaning of a site, roadway, or alley. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or by other means. [A.A.C. R18-2-804.B]

c. Unless otherwise specified, no mobile source shall emit smoke or dust the opacity of which exceeds 40%. [A.A.C.R18-2-801.B]

2. Recordkeeping Requirement

The Permittee shall keep a record of all emissions related maintenance activities performed on the Permittee's mobile sources stationed at the facility as per manufacturer's specifications. [A.A.C.R18-2-306.A.5.a]

3. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C. R18-2-801, A.A.C. R18-2-802.A, A.A.C. R18-2-804.A and A.A.C. R18-2-804.B. [A.A.C.R18-2-325]

V. OTHER PERIODIC ACTIVITY REQUIREMENTS

A. Abrasive Blasting

Particulate Matter and Opacity Standards

1. Emissions Limitations/Standards

a. 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:

(1) wet blasting;

(2) effective enclosures with necessary dust collecting equipment; or

(3) any other method approved by the Director.

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

b. Opacity Limitations

(1) Until after April 23, 2006, the Permittee shall not cause, allow or permit visible emissions from sandblasting or other abrasive blasting operations in excess of 40% opacity as measured by EPA Reference Method 9. [A.A.C. R18-2-702.B.2]

(2) After April 23, 2006, the Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any sandblasting or other abrasive blasting operations, opacity of greater than 20%. [A.A.C.R18-2-702.B.3]

2. Monitoring and Recordkeeping Requirement

Each time an abrasive blasting project is conducted, the Permittee shall log in ink or in an electronic format, a record of the following:

a. The date the project was conducted;

b. The duration of the project; and

c. Type of control measures employed.

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

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-726, A.A.C. R18-2-702.B2, and A.A.C. R18-2-702.B.3

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

B. Use of Paints

1. Volatile Organic Compound

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) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or

(b) Thin or dilute any architectural coating with a photochemically reactive solvent. [A.A.C.R18-2-727.B]

(3) For the purposes of Conditions V.B.1.a(2) and V.B.1.a(5), 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 Conditions V.B.1.a(3)(a) through V.B.1.a(3)(c) below, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

(a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.

(b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.

(c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichloroethylene or toluene: 20 percent. [A.A.C.R18-2-727.C]

(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 Conditions V.B.1.a(3)(a) through V.B.1.a(3)(c) above, 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]

(5) The Permittee shall not dispose of by evaporation more than 1.5 gallons of photochemically reactive solvent in any one day. [SIP Provision R9-3-527.C]

b. Monitoring and Recordkeeping Requirements

(1) Each time a spray painting project is conducted, the Permittee shall log in ink, or in an electronic format, a record of the following:

(a) The date the project was conducted;

(b) The duration of the project;

(c) Type of control measures employed;

(d) Material Safety Data Sheets for all paints and solvents used in the project; and

(e) The amount of paint consumed during the project.

(2) Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of Condition V.B.1.b(1) above.

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

c. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C.R18-2-727 and SIP Provision R9-3-527.C.

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

2. Opacity Standard

a. Emissions Limitations and Standards

(1) Until after April 23, 2006, visible emissions for spray painting operations shall not have opacity of greater than 40%, as measured by EPA Reference Method 9.

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

(2) After April 23, 2006, the Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any spray painting operations, opacity of greater than 20%.

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

b. Permit Shield

Compliance with the conditions of this Section shall be deemed compliance with A.A.C.R18-2-702.B.2 and 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.8]

2. Monitoring and Recordkeeping Requirement

The Permittee shall keep all required records in a file. The required records shall include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents. [A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-1101.A.8. [A.A.C. R18-2-325]

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ATTACHMENT "C": EQUIPMENT LIST

Air Quality Control Permit No. 28161
for
El Paso Natural Gas, Seligman Compressor Station

EQUIPMENT TYPE	MAXIMUM CAPACITY*	MAKE	MODEL	SERIAL NUMBER	INSTALLATION /MFG DATE	NSPS APPLICABLE
Gas Turbine Engine	7,110 hp	General Electric	MS3962G	147839	1966	No
Gas Turbine Engine	10,508 hp	Solar	Mars 100-T15000S	0727M	2002	Yes
Auxiliary Generator	276 hp	Generac	SG0175	2064852	2002	N/A

N/A = Not Applicable
* Site horsepower at 80°F