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**Technical Support Document  
El Paso Natural Gas Company – Casa Grande Compressor Station  
Permit #V20687.000**

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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.

**4. Attainment Classification**

This facility is located in an area that is nonattainment for PM10 and PM2.5. The area is currently in attainment for all other pollutants.

**5. Permitting History**

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

<b>Permit/ Revision</b>	<b>Type</b>	<b>Issuance</b>	<b>Reason for Permitting</b>
V20607.000	New	12/15/00	Initial Title V
V20607.R01	Significant Revision	7/8/03	Adding 2 simple cycle turbines and emergency generator
V20607.R02	Minor Revision	12/22/04	Revising capacity of emergency generator
V20624.000	Renewal	9/27/05	Title V renewal
V20643.000	Renewal	10/29/10	Title V Renewal
V20643.R01	Revision	10/1/13	Change in the testing frequency of the Solar Centaur Turbines

V20663.000	Renewal	7/30/15	Title V Renewal
V20687.000	Renewal	10/15/20	Title V Renewal

**6. Compliance/Enforcement History**

The last inspection of this facility was conducted in August 2018. The facility was in compliance. The last performance test for NOx emissions was conducted in January of 2019 on the GE Frame 3 turbines. Results indicate that NOx emissions are at approximately 20% of the 500 ppm limitation. The Solar turbines, C1 and C2 were last tested in June of 2018 and January of 2019 respectively. Results indicated that NOx emissions are approximately 85% of the of the NSPS limitation of 15.75 ppm. 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 Casa Grande 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 Casa Grande compressor station was built in the 1950's. That antedates any construction-permit requirements under either the Clean Air Act, Arizona statutes, or local rules. The source includes three natural gas fired GE turbines each rated at 6050 horsepower (at site elevation and 80F), 2 natural gas fired Centaur simple cycle combustion turbines rated at 6245 hp (at 0F) and an emergency generator.

**8. Permit Changes**

8.1 RICE NESHAP

This renewal adds The National Emissions Standards for Hazardous Air Pollutants (“NESHAP”) 40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines (RICE) provisions as they apply to the emergency generator.

8.2 Opacity

This renewal clarifies which opacity rules apply to the equipment at the site and adds an opacity performance standard as set forth in PCAQCD Code 5-23-1010.C.

**9. Emissions**

8.3 Actual Emissions (2019) in Tons per Year

NOX	CO	VOC	SO2	PM10	PM2.5	HAPs
3.57	0.38	1.08	0.37	0.72	0.72	0.1

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

Emissions Unit	NOX	CO	VOC	SO2	PM10	PM2.5	Formaldehyde	HAPs
<b>3 GE Units</b>	473.1	107.7	2.43	3.93	7.62	7.62	0.81	1.2
<b>2 Centaur Units</b>	28.0	13.2	0.96	1.56	3.04	3.04	0.32	0.48

