

**Technical Support Document**  
**Title V Permit**  
**El Paso Natural Gas Company**  
Oracle Compressor Station; Permit # V20622.000

**1. Disclaimer**

The provisions of this technical support 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.

**2. 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. 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, and there are only minor administrative 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 TSD located in *I:\WP\PERMITS\ENGREV\V20608\V20608.wpd*

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 applicant has certified that it is currently in compliance.

The NO<sub>x</sub> Potential to Emit (including emissions from the emergency generator) reaches 240 tpy.

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 500 hours of operation per year.

**4. Permit Changes: Clarifications; NSPS;**

A. Insignificant Activities

The Insignificant Activities List of Appendix B has been expanded to include diesel and fuel oil storage tanks with capacity of 40,000 gallons or less per §1-3-130.74a.b. Lubricating oil tanks with a vapor pressure of less than 1.5 psia and with a capacity of 40,000 gallons or less are present at the facility. These tanks are Insignificant Activities and exempted from the requirements of §5-18-742.

B. NSPS Subpart GG: Sulfur and nitrogen monitoring

In accordance with the most recent revision to 40 CFR 60 subpart GG, turbines which burn natural gas that meets the definition in the NSPS are not required to conduct sulfur and nitrogen monitoring. The rule does require that the facility demonstrate that they meet the natural gas definition. The permit has been revised to accommodate for the changes in the NSPS.