

Northwest Pipeline
Washougal Compressor Station
Title V Basis Statement

Southwest Clean Air Agency
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PERMIT #: SW98-7-R3

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ISSUED TO:

Northwest Pipeline
295 Chipeta Way
P. O. Box 58900
Salt Lake City, UT 84158-0900

PLANT SITE:

Northwest Pipeline
Washougal Compressor Station
1309 NE Brown Road
Washougal, WA 98671

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I. GENERAL INFORMATION AND CERTIFICATION

1. Company Name: Northwest Pipeline
2. Facility Name: Washougal Compressor Station
3. Parent Company: The Williams Companies
4. Responsible Official: Rob Harmon, Director of Operations
5. Facility Contact Person: Derek Forsberg, Environmental Specialist
6. Unified Business Identification Number: 600121240
7. Standard Industrial Classification Code: 4922 [NAICS - 486210]

8. Basis for Title V Applicability:

The Washougal Compressor Station has the potential to emit more than 100 tpy of nitrogen oxides (NO_x), more than 100 tpy of carbon monoxide (CO) and greater than 10 tpy of formaldehyde.

The maximum facilitywide potential to emit (PTE) of these air pollutants has been determined below:

Pollutant	PTE (tpy)
NO _x	143.3
CO	114.4
VOC	29.3
SO ₂	1.5
PM	15.2
PM ₁₀	15.2
PM _{2.5}	15.2
All TAPs	16.7
All HAPs	16.7

9. Purpose of Current Permitting Action:

The purpose of the current permitting action is to renew the Title V Permit for this facility and to incorporate 40 CFR 63 Subpart DDDDD requirements. SWCAA has not issued any New Source Review permits for this facility and no significant physical changes have been made to facility equipment since the last Title V Permit was issued.

10. Attainment Area:

Northwest Pipeline Washougal Compressor Station is located in an area which is in attainment for all pollutants but is within one mile of the Portland-Vancouver maintenance area for ozone and CO.

11. Facility Description:

Northwest Pipeline operates a natural gas pipeline system that spans from the Canadian border near Sumas, Washington to the San Juan Gas Fields in New Mexico. Natural gas compressor stations are located about every 50 miles along the pipeline. Each station is designed for remote, unattended operation from Salt Lake City, Utah.

The Washougal Compressor Station is located north of Washougal in Clark County, Washington. The facility consists of one reciprocating engine in the compressor building, one turbine in plant B building, an auxiliary building, and the piping associated with the station. The Northwest Pipeline Washougal Compressor Station has five emission units designated as EU1 through EU5, for the reciprocating engine, turbine, boiler, generator and fire pump, respectively.

12. Facility History:

The Washougal Compressor Station was constructed in December 1971. The reciprocating engine, boiler and emergency generator were installed at this time. In 1993, Northwest Pipeline performed a system wide upgrade. As part of the upgrades a new Centaur 50-T5700S turbine was installed and CleanBurn™ low-NO_x technology was installed on the existing engine. In addition, the boiler and generator were replaced. Northwest Pipeline installed an electric starter on the turbine in 1997 to reduce noise and odor. The electric starter reduces releases of natural gas from the turbine during startups. Northwest Pipeline increased the stack heights by 31.6 feet and 24 feet for the engine and turbine, respectively in 1999. In 2006 the Centaur 50-T5700S was uprated and rewheeled to a Taurus 60-T7800S. The power turbine section of the turbine were replaced with a larger 7,800 horsepower (hp) Taurus turbine. The compressor section was not replaced.

13. SWCAA Air Discharge Permits:

The following table lists each Air Discharge Permit (ADP) issued for this facility. ADPs in bold contain no active requirements. The requirements may have been superseded, may have been of limited duration, or the equipment may have been removed.

Permit	Permit Application	Date Issued	Description
94-1716	CL-1043	1/23/95	Approved the retrofit of the existing Cooper-Bessemer 12/14V250C2 reciprocating engine-driven compressor with Clean-Burn combustion technology and installation a Solar Centaur 50-T5700S (SOLONOX) gas turbine-driven compressor equipped with low-NO _x (oxides of nitrogen) combustor technology
94-1716	CL-1043	1/23/95	Approved the retrofit of the existing Cooper-Bessemer 12/14V250C2 reciprocating engine-driven compressor with Clean-Burn combustion technology and installation a Solar Centaur 50-T5700S (SOLONOX) gas turbine-driven compressor equipped with low-NO _x (oxides of nitrogen) combustor technology

97-2063R1	CL-1406	3/8/99	Modified the date which the turbine and reciprocating engine stack heights must be increased to 84 feet from December 31, 1998 to March 31, 1999.
05-2596	CL-1675	2/2/06	Approved the replacement of the Centaur turbine with a Taurus turbine. Modified the testing frequency for the Cooper-Bessemer engine. This permit superseded 97-2063R1.

II. EMISSION UNIT DESCRIPTIONS

EU1 Reciprocating Engine

Emission Unit #1 is a Cooper-Bessemer model 12/14V250C2 turbocharged 12 cylinder, two cycle reciprocating engine-driven compressor rated at 4,000 horsepower, equipped with clean burn technology. The engine burns natural gas and has been permitted to operate 8,760 hours per year. Criteria pollutants emitted from the operation of the engine include nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM), and volatile organic compounds (VOCs). Hazardous air pollutants (HAPs) emitted from the operation of the engine include benzene and formaldehyde.

EU2 Taurus Turbine

Emission Unit #2 is a Solar Turbines, Inc. Taurus 60-T7800S (SOLONOX), gas turbine rated at 7800 horsepower output. The turbine burns natural gas fuel and is permitted to operate 8,760 hours per year. Criteria pollutants emitted from the operation of the turbine include NO_x, CO, SO₂, PM, and VOCs. HAPs emitted from the operation of the turbine include benzene and formaldehyde. 40 CFR 60.4300 et seq. (Subpart KKKK) "Standards of Performance for Stationary Combustion Turbines for Which Construction is Commenced After February 18, 2005" applies to the turbine. Pursuant to 40 CFR 60.8, an initial source test was conducted on December 14, 2006 at four loads ranging from 90% to 100% of maximum load.

EU3 Boiler

Emission Unit #3 is a Sellers model C60W natural gas fired process heater (boiler) with a heat input rate of 2.5 MMBtu per hour. The boiler provides hot water for process heating. Criteria pollutants emitted from the operation of the boiler include NO_x, CO, SO₂, PM, and VOCs. This unit is 40 CFR 63 Subpart DDDDD applicable and is designated as a Gas 1 subcategory.

EU4 Emergency Generator Engine

Emission Unit #4 is a Caterpillar 452 KW, 606 hp, model SR4 emergency electrical generator engine which is natural gas fired. Criteria pollutants emitted from the operation of the generator include NO_x, CO, SO₂, PM, and VOCs. This unit is subject to applicable requirements found in 40 CFR 63 Subpart ZZZZ.

EU5 Fire Pump

This unit is a Detroit Diesel-Allison, Inc diesel fire pump, 80 hp model PDFP 04YT2502 serial number U693769A manufactured in August 1995. It is used to provide water to a hydrant used by the fire department. The facility does not utilize this engine. This unit is not an insignificant emission unit because it is subject to applicable requirements found in 40 CFR 63 Subpart ZZZZ.

III. INSIGNIFICANT EMISSION UNIT IDENTIFICATION

Each emission unit listed as insignificant in the permit has been reviewed by SWCAA to confirm its status. Emission units were determined to be insignificant as follows:

IEU1 Glycol Storage and Handling

Glycol storage and handling is categorically insignificant in accordance with WAC 173-401-532(4).

IEU2 Emissions from Natural Gas Pipeline and Fuel System

Fugitive emissions from the natural gas pipeline and fuel system are insignificant in accordance with WAC 173-401-530(1)(d).

IEU3 Utility Building Heater

The utility building heater is rated at 145,000 Btu/hour. This unit is not regulated under any specific ADP and is insignificant based on size per WAC 173-401-533(2)(r).

IEU4 Water Heater

The water heater is National model N20S natural gas fired and is rated at 2,000 Btu/hr. This unit provides hot water to the onsite bathroom sink. This unit is not regulated under any specific ADP and is insignificant based on size per WAC 173-401-533(2)(r).

IV. EXPLANATION OF SELECTED PERMIT PROVISIONS AND GENERAL TERMS AND CONDITIONS

P12. Excess Emissions

SWCAA 400-107

SWCAA 400-107 establishes criteria and procedures for determining when excess emissions are considered unavoidable. Emissions that meet the requirements to be classified as unavoidable are still considered excess emissions and are reportable but are excused and not subject to penalty. Notification of excess emissions is required as soon as possible and shall occur by the next business day following the excess emissions event. Excess emissions due to startup or shutdown conditions are considered unavoidable if the permittee adequately demonstrates the excess emissions could not have been prevented through careful planning and design. Upset excess emissions are considered unavoidable if the permittee adequately demonstrates the upset event was not caused by poor or inadequate design, operation, maintenance, or other reasonably preventable condition, and the permittee takes appropriate corrective action that minimizes emissions during the event, taking into account the total emissions impact of that corrective action.

G2. Chemical Accident Prevention Provisions

40 CFR 68

40 CFR 68 “Chemical Accident Prevention Provision” does not apply to Northwest Pipeline’s compressor stations because the compressor stations do not meet the definition of “stationary source”. Under 40 CFR 68 Subpart A, definitions, the regulations state under the term “Stationary Source” the following: “...The term stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. ...Transportation includes, but is not limited to, transportation subject to oversight or regulation under 49 CFR parts 192, 194, 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to DOT under 49 U.S.C. section 60105...” Northwest Pipeline is a natural gas transmission company, is currently regulated under 49 CFR part 192 and thus is not required to submit a risk management plan. However, the regulation has been included in the general terms of the permit in order to address future operations that may store or handle substances that are subject to the regulation.

G8. Permit Renewal

WAC 173-401-710(1)

An Air Operating Permit has an effective term of 5 years from the date of final issuance. Pursuant to WAC 173-401-710(1), the Permit specifies a date by which a renewal application is required to be submitted to SWCAA. A preliminary renewal application must be submitted no later than 9 months prior to permit expiration. A complete renewal application must be received no later than 6 months prior to permit expiration. Early submittal of a preliminary application is intended to provide SWCAA with the opportunity to review the application for completeness and allow the permittee sufficient time to amend the application, if necessary, prior to the final submission date.

G10. Portable Sources

SWCAA 400-110(5)

SWCAA 400-110(6) (*SWCAA 400-110(5) in SIP version of rule*) establishes procedures for approving the operation of portable sources of air emissions that locate temporarily at project sites. These requirements are general statewide standards and apply to all portable sources of air contaminants. Common equipment subject to these conditions include emergency generators,

engine-powered pumps, rock crushers, concrete batch plants, and hot mix asphalt plants that operate for a short time period at a site to fulfill the needs of a specific contract. Portable sources exempt from registration under SWCAA 400-101 are exempt from SWCAA 400-110 and not subject to the portable sources requirements. Operations with potential to emit less than 1 tpy combined of all criteria pollutants plus volatile organic compounds are among those categories listed in SWCAA 400-101 as exempt.

WAC 173-400-700

WAC 173-460 (*Local*)

SWCAA 400-109, SWCAA 400-110

G12. New Source Review

SWCAA 400-141

Construction or modification of an air pollution source is subject to review to ensure that applicable emission standards are met and appropriate control technology is employed. The program under which a new source or modification is reviewed depends on the type and quantity of potential air emissions associated with the project. New sources or modifications that meet the definition of a 'major stationary source' are subject to review under the Prevention of Significant Deterioration (PSD) program, which is administered by the Department of Ecology. Sources that are too small to be a major source (minor sources) are subject to review under SWCAA's new source review program. New sources or modifications that increase the emission of toxic air pollutants are subject to review under SWCAA's toxic air pollutant program, which implements the 2/14/94 version of WAC 173-460.

G17. Reporting of Emissions of Greenhouse Gases

WAC 173-441 (*state*)

WAC 173-441 requires owners and operators to quantify and report emissions of greenhouse gases from applicable source categories if actual emissions from their facility are ten thousand metric tons CO₂e or more per year. Annual greenhouse gas emissions from this facility have the potential to be greater than ten thousand tons so the facility may be subject to the reporting program if actual emissions are ten thousand metric tons CO₂e or more per year. All required reports are to be submitted directly to Ecology. Likewise, report review and approval of calculation methodology is performed by Ecology with little or no involvement by SWCAA.

V. EXPLANATION OF OPERATING TERMS AND CONDITIONS

Req. 1-3 New Source Performance Standards for Stationary Turbines Constructed After February 18, 2005, Subpart KKKK **40 CFR 60.4300, SWCAA 400-115**

40 CFR 60.4300 (Subpart KKKK) established NO_x emission standards and sulfur fuel content limits for affected facilities. This is an affected facility because the turbine (EU2) has a heat input at peak load greater than 10.7 gigajoules per hour and was modified after February 18, 2005. In 2006 the power turbine section of the turbine was replaced with a larger 7800 horsepower (hp) Taurus turbine. The compressor section was not replaced making this a modified/reconstructed unit.

Req. 4-8 MACT for RICE **40 CFR 63, Subpart ZZZZ**

40 CFR 63, Subpart ZZZZ establishes standards for stationary reciprocating internal combustion engines (RICE). Under the provisions of Subpart ZZZZ, the Emergency Generator and Fire Pump at this facility are classified as existing stationary RICE and are subject to the regulation. The Emergency Generator is >500 hp existing emergency RICE at a major HAP source. The Fire Pump is an existing <100 hp stationary compression ignition engine located at a major HAP source.

Req. 9-16 General Standards for Maximum Emissions **SWCAA 400-040**

SWCAA 400-040 establishes maximum emission standards for various air contaminants. These standards apply to all emission units at the source, both EU and IEU. Pursuant to WAC 401-530(2)(c), the Permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for affected IEUs except those specifically identified by the underlying requirements. General monitoring provisions have been created under “gap-filling” to provide reasonable compliance assurance for general standards that do not specify a monitoring regime.

Req. 15 prohibits any concealment or masking. At present, the permittee does not operate any equipment capable of masking emissions, therefore monitoring is limited to the semi-annual compliance certification.

Req. 17 Emission Standards for Combustion and Incineration Units **SWCAA 400-050**

SWCAA 400-050 establishes maximum emission standards for selected emissions from combustion and incineration units. These requirements apply to all combustion and incineration units at the source, both EUs and IEUs. Pursuant to WAC 173-401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for IEUs except those specifically identified by the underlying requirements.

Req. 18 Emission Standards for General Process Units **SWCAA 400-060**

SWCAA 400-060 establishes maximum particulate matter emission standards for general process units. These requirements apply to all general process units at the source, both EUs and IEUs. Pursuant to WAC 173-401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for IEUs except those specifically identified by the underlying requirements.

Req. 19-28 SWCAA Air Discharge Permits **ADP 05-2596**

There is currently one active ADP which applies to operations at this source. ADP 05-2596 approved replacement of the turbine with a larger turbine and superseded the previously active permit. The emission limits contained in ADP 05-2596 are as follows:

ADP 05-2596 Emission Limits (ton/yr)					
Pollutant	Turbine (EU2)	Engine (EU1)	Boiler (EU3)	Generator (EU4)	Facilitywide
CO	34.54	77.2	0.90	1.72	114.4
NO _x	28.37	115.8	1.07	1.02	143.3
SO ₂	0.98	0.44	0.04	0.002	1.5
VOC	9.89	19.3	0.06	0.01	29.3
PM	1.87	13.2	0.08	0.01	15.2
Benzene	0.002	0.25	---	---	0.25
Formaldehyde	1.08	15.3	---	---	16.4

These limits along with monitoring and operating limits were included in the Title V Permit.

VI. EXPLANATION OF OBSOLETE AND FUTURE REQUIREMENTS

1. 40 CFR 60.7 "Notification and Record Keeping" and ADP 05-2596 Conditions 29 and 30

Construction of the turbine commenced on September 14, 2006 and SWCAA received documentation of this action on September 29, 2006. Initial firing of the turbine occurred on October 21, 2006 and SWCAA received documentation of initial firing on October 30, 2006. Actual start-up with a load for working purposes occurred on November 9, 2006 and documentation was received by SWCAA on November 15, 2006.

2. Obsolete Air Discharge Permits

ADP 94-1716 approved installation of a low-NO_x turbine, clean burn retrofit of the existing reciprocating engine and replacement of the existing boiler and emergency generator with new models. This ADP was superseded by ADP 97-2063.

ADP 97-2063 approved an increase in particulate matter, formaldehyde and benzene emission limits. This ADP was superseded by ADP 97-2063R1.

ADP 97-2063R1 modified the date which the turbine and reciprocating engine stack heights must be increased to 84 feet from December 31, 1998 to March 31, 1999. This ADP was superseded by ADP 05-2596.

ADP 96-1956 established emission reduction credits for NO_x in the amount of 40.0 tons, deposited into the SWCAA emission reduction credit bank. This ADP expired 10 years after issuance.

3. MACT for Boilers

40 CFR 63, Subpart DDDDD

Boiler MACT requires a one-time energy assessment. This requirement has been fulfilled.

4. Future Requirements

None identified.

VII. EXPLANATION OF MONITORING TERMS AND CONDITIONS

The monitoring terms listed below incorporate formal monitoring taken from applicable regulations as well as 'gap-fill' monitoring designed to assure compliance for requirements that do not contain formal monitoring. For applicable requirements that have one-time applicability or apply primarily to equipment design or installation, SWCAA relies upon compliance certification by the responsible official to provide compliance assurance.

M1. NO_x Standard

Req-1

The requirement cited in this monitoring section is taken from Subpart KKKK, 40 CFR 60.4320(a).

M2. Compliance Certification

Reqs-2, 14, 15, 25 and 27

The requirements cited in this monitoring section are taken from Subpart KKKK, 40 CFR 60.4365(a), SWCAA 400-040(6), and SWCAA 400-040(7), and from ADP 05-2596. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615.

40 CFR 60.4365(a) requires that the turbine not burn any fuel which contains total potential sulfur emissions in excess of 26 nanograms (ng) SO₂/J (0.06 lb SO₂/MMBtu) heat input. This turbine burns natural gas with a valid tariff sheet specifying that the total sulfur content is 20 grains of sulfur or less per 100 standard cubic feet. As shown in the following equation, a sulfur content of 20 grains per 100 standard cubic feet is equivalent to 0.057 lb SO₂/MMBtu based on an average heat content of 1000 Btu/scf. Therefore the sulfur content of the natural gas will remain below the required limit and semi-annual certification is deemed sufficient to assure compliance.

$$20 \frac{\text{gr S}}{100\text{scf}} \times \frac{\text{lb}}{7000 \text{ gr}} \times \frac{\text{scf}}{1000 \text{ Btu}} \times \frac{1,000,000 \text{ Btu}}{\text{MMBtu}} \times \frac{64 \text{ lb/lbmol SO}_2}{32 \text{ lb/lbmol S}} = 0.057 \frac{\text{lb SO}_2}{\text{MMBtu}}$$

SWCAA 400-040(6) limits the emission of gaseous SO₂ from any emission unit to a maximum concentration of 1,000 ppmv corrected to 7% oxygen. The combustion sources at this source combust only natural gas which has an extremely low sulfur content. Based on the composition of natural gas, it is not possible for the combustion sources in question to exceed the limit of 1000 ppmv SO₂ while firing on natural gas. Monitoring has therefore been limited to certification of fuel type. The following equation estimates sulfur dioxide concentrations in exhaust gas from natural gas combustion based on EPA's Method 19 fuel factor of 8710 dscf/MMBtu for natural gas and a sulfur grain loading of 1.2 grains per 100 cubic feet which results in a value of 0.00345 pounds of SO₂ per MMBtu:

$$(0.00345 \text{ lbs/MMBtu}) * (385 \text{ cf/mole}) * (\text{mole}/64.1 \text{ lbs SO}_2) * (\text{MMBtu}/8710 \text{ dscf}) * \\ (20.9 - 15.0)/(20.9) = 0.7 \text{ ppm at 15 percent oxygen}$$

Based on the inherently low concentration of sulfur in pipeline quality natural gas, fuel certification is adequate to demonstrate compliance.

SWCAA 400-040(7) prohibits the concealment or masking of emissions which would otherwise violate a general standard. The permittee does not operate any equipment capable of masking emissions so semi-annual certification is deemed sufficient to assure compliance.

ADP 05-2596 Condition 10 requires that all equipment shall be fired on natural gas only with a total sulfur content of 20.0 grains per 100 standard cubic feet or less. This facility is a natural gas compressor station with no access to fuels other than pipeline quality natural gas. Therefore semi-annual certification is deemed sufficient to assure compliance.

ADP 05-2596 Condition 12 requires that the stack height of the reciprocating engine and turbine shall not be less than 84 feet above ground level unless modeling is performed and approved by SWCAA that demonstrates compliance with all applicable regulations and standards at a lower stack height. NW Pipeline has submitted documentation verifying that the stack height is at 84 feet. It is unlikely that the stack height will be modified. Therefore semi-annual certification is deemed sufficient to assure compliance.

M3. Turbine Monitoring **Req-3 and 21**

The requirement cited in this monitoring section is taken from SWCAA 05-2596, Condition 20.

M4. Emergency Generator Engine Hours Monitoring **Req-4 and 5**

This monitoring section is drawn from 40 CFR 63.6655 and SWCAA 05-2596, Condition 22. Periodic testing is not required for this unit due to its status as emergency use only. Operation and maintenance requirements from 40 CFR 63, Subpart ZZZZ have been incorporated into the monitoring as appropriate. Compliance with applicable emission limits is demonstrated based on recorded hours of operation and emission factors taken from the Technical Support Document (TSD) for ADP 05-2596.

M5. Fire Pump Monitoring Plan **Req-6,7 and 8**

This monitoring section is drawn from 40 CFR 63.6655. Periodic testing is not required for this unit due to its small size (80 hp) and limited use. Operation and maintenance requirements from 40 CFR 63, Subpart ZZZZ have been incorporated into the monitoring as appropriate.

M6. Opacity Monitoring **Reqs-9, 17, 18 and 24**

The applicable requirements cited in this monitoring section are general requirements drawn from WAC 173-400, SWCAA 400 and ADP 05-2596. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615(1). These requirements are designed to assure compliance through periodic facility inspections and prompt corrective action. Demonstration of compliance is required in some cases via visible emissions evaluation. The emission units at this facility combust only natural gas or diesel. Visible emissions, other than heat waves, from natural gas or diesel combustion are virtually non-detectable to the human eye. The following equation shows an example calculation of particulate matter concentrations in exhaust gas from natural gas combustion based on an EPA AP-42 emission factor and EPA's Method 19 fuel factor of 8710 dscf/MMBtu corrected to 15% oxygen:

$$(0.005 \text{ lbs PM/MMBtu}) * (7000 \text{ gr/lb}) * (\text{MMBtu}/8710 \text{ dscf}) * (20.9-15.0)/(20.9) = \\ 0.001 \text{ gr/dscf at 15\% oxygen.}$$

Emissions are generally not visible until the concentration approaches 0.01 gr/dscf. In addition, this source has a history of opacity compliance. Therefore, monthly opacity monitoring is considered adequate for demonstrating compliance with WAC 173-460 and SWCAA 400 requirements as well as ADP 05-2596 opacity requirements.

M7. Fugitive Emissions Monitoring**Reqs-10, 11, 12 and 16**

The applicable requirements cited in this monitoring section are all general requirements drawn from SWCAA 400. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615(1). These requirements are designed to assure compliance through a combination of prompt complaint response and monthly facility inspections.

Potential fugitive emissions from this facility include road dust and odors from fugitive natural gas. Since the facility surface consists of gravel and vehicular traffic is limited to maintenance personnel, road dust is expected to be minimal. Natural gas in the pipeline has not been odorized but does contain small quantities of naturally occurring mercaptans. During normal operation odors are not detectable off site. Monthly facility inspections are adequate to demonstrate compliance with fugitive emissions because odors are not generated as part of routine maintenance but may be generated by upset conditions which will be reduced by preventative maintenance.

M8. Complaint Monitoring**Req-13**

The applicable requirements cited in this monitoring section are general requirements drawn from WAC 173-400 and SWCAA 400. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615. These requirements are designed to ensure compliance through prompt complaint response and corrective action.

M9. Reciprocating Engine Testing and Recording Requirements**Reqs-19 and 20**

The applicable requirements cited in this monitoring section are taken from ADP 05-2596. The engine is also subject to SWCAA 400-052 which requires emission testing of sources which emit 100 tpy or more of a pollutant. SWCAA 400-052 requires testing of combustion units once every two years unless an alternative sampling schedule has been approved by SWCAA. This alternative sampling schedule is contained in ADP 05-2596.

The purpose of testing is to generate emission factors with which to demonstrate compliance. ADP 05-2596 requires that the reciprocating engine be emission tested at least once every five years. If the engine has operated more than 5,000 hours since the last emission test, testing shall be performed during the next calendar year. Source testing shall be performed at two operating conditions, one of which must be representative of maximum intended operating conditions. The second load condition shall consist a load (<85% torque and <218 rpm, <85% torque and ≥218 rpm, or ≥85% torque and <218 rpm) that the engine has most frequently operated at since the last source test or another load condition agreed upon by SWCAA. In addition, M9 requires that the source record monthly hours of operation of the engine at each of the four load conditions. This information is necessary to determine emissions.

SWCAA has determined that the performance from this unit will not significantly degrade with time based on emission source tests from similar type units as well as a long history of emission

testing performed on this unit. The testing frequency requires that the engine be tested once every five years if operated infrequently and every two years if the engine operates significantly. Emissions of SO₂ and mercury are a function of the fuel composition and are not generated as the result of incomplete combustion.

The method of calculating emissions is taken from the TSD to ADP 05-2596 with the exception of SO₂ calculation. The TSD to ADP 05-2596 states that SO₂ emissions shall be calculated based on the annual average sulfur content and the quantity of natural gas combusted. However, all other emissions are calculated based on hours of operation, not amount of fuel consumed. Therefore, the AOP will specify that SO₂ emissions be calculated based on the annual average sulfur content of the fuel, hours of operation of the unit and the maximum heat input of the unit. This will result in a conservative emission estimate that will require the same calculation method as the other pollutants. Benzene and mercury compliance is to be determined by hours of operation and the emission factors contained in the TSD for ADP 05-2596.

M10. Turbine Testing and Recording Requirements **Reqs-19 and 21**

The applicable requirements cited in this monitoring section are taken from ADP 05-2596 with the exception of the method of calculating SO₂ emissions. The purpose of testing is to generate emission factors with which to demonstrate compliance. SWCAA does not believe that the performance from these units will significantly degrade with time based on emission source tests from similar type units. Therefore, SWCAA believes testing every five years is adequate. In addition, natural gas turbines do not emit significant quantities of PM, SO₂, formaldehyde, or benzene. Also, emissions of SO₂, and benzene are a function of the fuel content and are not generated as the result of incomplete combustion.

The method of calculating emissions is taken from the TSD to ADP 05-2596 with the exception of SO₂ calculation. The TSD to ADP 05-2596 states that SO₂ emissions shall be calculated based on the annual average sulfur content and the quantity of natural gas combusted. However, all other emissions are calculated based on hours of operation, not amount of fuel consumed. Therefore, the AOP will specify that SO₂ emissions be calculated based on the annual average sulfur content of the fuel, hours of operation of the unit and the maximum heat input of the unit. This will result in a conservative emission estimate that will require the same calculation method as the other pollutants. Compliance with the emission limits for PM, formaldehyde and benzene is to be determined by hours of operation of each unit and the emission factors contained in the permit. In addition, M10 requires that the source record monthly hours of operation of the turbine. This information is necessary to determine emissions.

M11. Boiler and Generator Recording Requirements **Reqs-19, 22, 23 and 28**

The boiler and emergency generator are not required to be tested. Emissions from these units are minimal therefore compliance with the emission limits is to be determined by hours of operation and the emission factors contained in the TSD for ADP 05-2596. In addition, M11 requires that the source record monthly hours of operation of the boiler and generator. This information is necessary to determine emissions.

M12. Reciprocating Engine RPM and Torque **Req-26**

The requirement cited in this monitoring section is taken from ADP 05-2596. Compliance is to be demonstrated by a continuous monitor for the rpm and torque. The data is to be reported based on hourly averages.

M13. Boiler Emissions Monitoring**Req-22**

The requirement cited in this monitoring section is taken from 40 CFR 63 Subpart DDDDD. Monitoring is to be conducted in accordance with 40 CFR 63 which prescribes a tune-up schedule and reporting formats.

VIII. EXPLANATION OF RECORDKEEPING TERMS AND CONDITIONS

This reporting section is taken directly from WAC 173-401-615(2). Recordkeeping requirements were separated into Sections (a) through (f) to organize the requirements. Sections (a) and (b) were added to clarify routine inspections and complaints.

K2. Boiler Recordkeeping

This recordkeeping section is taken directly from 40 CFR 63.

IX. EXPLANATION OF REPORTING TERMS AND CONDITIONS

R1. Deviations from Permit Conditions

The permittee is required to report all permit deviations. This reporting section is taken directly from SWCAA 400-107. The permittee is required to report all permit deviations no later than 30 days following the end of the month during which the deviation is discovered. Permit deviations due to excess emissions shall be reported to SWCAA as soon as possible. SWCAA may request a full report of any deviation if determined necessary. These deviations are also reported in each semi-annual report.

R2. Complaint Reports

The permittee is required to report all complaints received by the permittee or forwarded to the permittee by SWCAA regarding the compressor station but excluding noise or right-of-way issues to SWCAA within three business days of receipt to ensure prompt complaint response. This reporting section is based on WAC 173-401-615(3), and SWCAA's definition of "prompt" for reporting of complaints.

R3. Semi-annual Reports

The permittee is required to report monitoring records and certification of monitoring records on a semi-annual basis. Semi-annual reporting of monitoring records and certification of monitoring records is required by WAC 173-401-615(3). Sections (e) and (f) are taken directly from Subpart KKKK, 40 CFR 60.4300. Sections (g) through (k) of the semi-annual reports was taken from ADP 05-2596.

R4. Annual Compliance Certification

The permittee is required to report and certify compliance with all permit terms and conditions on an annual basis. Annual compliance certification is required by WAC 173-401-630(5). 40 CFR 60.11(g) requires the permittee to consider credible evidence when submitting compliance certifications for NSPS affected unit EU2.

R5. Emission Inventory Reports

The permittee is required to report an inventory of annual emissions as provided in SWCAA 400-105. The annual emissions inventory must be submitted to SWCAA by March 15th for the previous calendar year as provided in SWCAA 400-105. This complete emission inventory includes emissions from all EUs.

R6. Source Test Reports

This reporting requirement is taken from ADP 05-2650 Section 29. The permittee is required to submit test results to SWCAA within 45 days of test completion to allow timely review by SWCAA.

X. APPENDICES

Appendix A contains the criteria which must be met in order to use an alternate test method for formaldehyde.

XI. PERMIT ACTIONS**1. Current Permitting Action**

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| 1. Permit Renewal Application Submitted: | January 28, 2016 |
| 2. Permit Application deemed complete: | March 21, 2016 |
| 3. Permit Application sent to EPA: | July 19, 2016 |
| 4. Draft revised permit issued: | June 29, 2018 |
| 5. Proposed revised permit issued: | August 8, 2018 |
| 6. Final revised permit issued: | xxx |

2. Previous Permitting Actions

Permit Renewal – AOP SW98-7-R2

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| 1. Permit Renewal Application Submitted: | September 28, 2010 |
| 2. Permit Application deemed complete: | May 20, 2011 |
| 3. Permit Application sent to EPA: | May 25, 2011 |
| 4. Draft revised permit issued: | June 15, 2011 |
| 5. Proposed revised permit issued: | July 26, 2011 |
| 6. Final revised permit issued: | September 19, 2011 |