

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	03176	Company:	El Paso Natural Gas Company, L.L.C.
Project #:	20983	Site:	Plains Compressor Station
Account #:	YA-0051-J	Application Area:	Plains Compressor Station
Regulated Entity #:	RN100211747	Customer #:	CN600311682
Region:	2	County:	Yoakum
SIC Code:	4922	SIC Name:	Natural Gas Transmission
Permit Reviewer:	Elizabeth Moorhead		

SITE INFORMATION

Physical Location: 4 miles east of Denver City on the east side of CR-355 between CR-390 and CR-370

Nearest City: Denver City

Major Pollutants: CO, HAPS, NOX, VOC

Additional FOPs: None

PROJECT SUMMARY

El Paso Natural Gas Company, L.L.C.'s Plains Compressor Station site is a natural gas transmission facility subject to the requirements of 30 TAC Chapter 122. The Federal Operating Permit (FOP) was issued on August 31, 2009. A timely renewal application was received by the TCEQ on February 26, 2014. Significant emission sources at the site include process vents and engines, which are subject to State and/or Federal regulations. The FOP includes special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-REQ1, OP-REQ3, and various Unit Attribute forms).

PROCESS DESCRIPTION

El Paso Natural Gas Company, L.L.C. (EPNG) provides natural gas transportation services for natural gas suppliers and end users throughout the United States. The Plains Compressor Station is one of the natural gas compressor stations in the EPNG network which is owned and operated by EPNG. The purpose of this station is to compress natural gas to maintain enough pressure to keep the gas flowing through the pipeline network.

The facility consists of the following combustion equipment:

- Eleven (11) Cooper-Bessemer GMVA-10 natural gas-fired compressor engines
- Two (2) Cooper-Bessemer GMVC-10 natural gas-fired compressor engines
- Two (2) Cooper-Bessemer GMWC-10 natural gas-fired compressor engines
- One (1) Cooper-Bessemer JS-8-G emergency generator engine
- One (1) small emergency engine for backup power for communications
- One (1) fire water pump
- One (1) stand-by air compressor
- Three (3) small natural gas process heaters
- Two (2) diesel comfort heaters

The main source of power is purchased as necessary. The Cooper-Bessemer engines provide the compression required at this facility. The units at this facility are available for operation 8,760 hours per year. The Cooper-Bessemer JS-8-G auxiliary engine is used for backup electrical power as needed and is operated less than 10% of the available hours per year. There is also a small generator engine used for backup power for the communications equipment, a fire water pump, and a stand-by air compressor.

The Plains Compressor Station has various storage tanks for lube oil, used liquids, and water treatment chemicals for the cooling tower. The lube oil tanks provide lubrication oil for the compression equipment and the used liquid tanks hold oily wastewater captured by the inlet scrubber. The facility is also a small source of fugitive emissions from piping components, as well as from pipeline metering, purging, and maintenance.

The natural gas enters the facility from the 24" Dumas-Eunice line. Inside the station yard, the natural gas flows through an inlet scrubber, suction piping, and then into the natural gas compressor. After compression, the natural gas flows through the discharge piping and re-enters the pipeline.

The amount of natural gas transported in the EPNG pipeline varies depending on customer demand for natural gas. For those times when compression is not needed due to the volume of natural gas in the pipeline, EPNG will shut down operation of any number of compression units. Other factors may also require unit shutdown.

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?..... Yes
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?..... No
3. Was case-by-case PM or CAM included in the permit?..... No
4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?..... No
6. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... No
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No
8. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... Yes
9. Will the draft permit be sent to public notice with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

- There were no OP-NOTIFY submissions with this application.
- The permit reviewer determined during the technical review that PM was required for emission Unit ID Nos. AIR-1, AUX01, CTBD, & RECIP-A01 – RECIP-A15. Therefore, Form OP-MON was requested on June 10, 2014 and was received on June 23, 2014.
- The permit reviewer reviewed the existing permit shields. The MACT ZZZZ permit shield was deleted for Unit ID No. EMERGEN because the unit is now subject to the rule. The MACT ZZZZ permit shield was revised for Unit ID No. AUX01 because the negative applicability is now to § 63.6590(b)(3) instead of § 63.6600(c).

- A customized special term and condition was added for emission Unit ID Nos. AIR-1, & EMER-GEN. This term and condition requires these units, which are subject to 40 CFR Part 63, Subpart ZZZZ, to comply with the applicable requirements of 30 TAC Chapter 113, Subchapter C, § 113.1090.
- Terms and Conditions were updated due to the submission of Form OP-REQ1.
- The PBR effective dates were reviewed and updated as needed.
- The applicant reviewed the working draft permit and provided comments in an email dated August 11, 2014 (included in permit file). The applicant requested the removal of the fire water pump (WATER-1) from the permit, as it had been removed from service. A language change to the basis of determination was requested for GRPRECIP in the Permit Shield table for MACT ZZZZ. Periodic monitoring was updated for eighteen emission units (AIR-1, AUX01, CTBD, & RECIP-A01 - RECIP-A15) to allow for an annual monitoring frequency. The applicant chose PM-P-030 to demonstrate compliance. The permit was revised to reflect the approved changes.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP.

1. The Statement of Basis was prepared on 08/20/2014.
2. The Statement of Basis GroupWise Document # (OPDP Database) is 72249.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 07/08/2014.
2. The compliance history review evaluated the period from 02/26/2009 to 02/26/2014.

Site rating: 0.0 Company rating: 2.19

(High < 0.10; Satisfactory > 0.10 and < 55; Unsatisfactory > 55)

3. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No
2. Is a compliance plan and schedule included in the permit?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on 08/20/2014.
2. Were there any delinquent fees owed? No

Permit reviewer notes:

There were no outstanding delinquent fees.

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?..... No
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent for any reason?..... No
3. Publication date: 09/14/2014 Newspaper name: Denver City Press
4. Was bilingual public notice published?..... No
Publication date: Newspaper name:
5. Were comments received during Public Notice period?..... No
(a) Was a public hearing requested?..... No
(b) Was a public hearing held?..... No

- (c) Was the public hearing request withdrawn?..... No
- (d) Was permit content changed as a result of any public comments?..... No
6. Was re-publication necessary?..... No

EPA Review

1. Did EPA comment on the draft permit?..... No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... No
- If yes, did the EPA comment on the proposed permit?..... No
3. Were any changes made to the permit after the EPA Review Period?..... No
- If yes, were these changes made within the 60 day Public Petition Period?..... No

Permit reviewer notes:

*The Office of Chief Clerk's database was checked on 10/21/2014 & 11/13/2014 to verify no Public/EPA comments.

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	02/26/2014	
Date Project Received by Engineer	03/11/2014	
Technical Review Period	05/14/2014	08/19/2014
Working Draft Permit Reviewed by Applicant	07/10/2014	08/11/2014
Date PNAP/Draft Permit Mailed	08/27/2014	
Public Notice Comment Period	09/14/2014	10/14/2014
EPA Review Period	09/23/2014	11/07/2014
Date Sign Posting Certification Received	10/27/2014	

Milestone (Optional)	Start Date	End Date
Deficiency Cycle 1		
Deficiency Cycle 2		
Request for Comments on Compliance Plan		
Date Comment on Draft Permit Received from Public		
Date comment on Draft Permit Received from EPA		
Date Public Hearing Requested		
Date Public Hearing Held		

EFFECTIVE PERMIT ISSUANCE DATE:

Elizabeth Moorhead Permit Reviewer Operating Permits Section Air Permits Division	Date
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Julie Guthrie Team Leader Operating Permits Section Air Permit Division	Date
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CONTACT INFORMATION

Responsible Official:

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