

**EL PASO NATURAL GAS - ORACLE**

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## 1. Introduction

This introduction offers a brief context for the remainder of this permit document. Nothing in this introduction is meant to limit either any applicable provision of law, or any of the operative provisions of the permit, as set forth in the subsequent sections of this permit.

This permit renewal authorizes the operation of an existing natural gas fired pipeline compressor station for the transmission of natural gas, owned and operated by El Paso Natural Gas Company, a Delaware corporation. The facility, commonly known as the Oracle Compressor Station, is located about 0.5 mile east Oracle, Arizona, in Section 30, Township 9 South, Range 16 East, G&SRB&M, Pinal County, Arizona, upon parcels also identified by State Assessor's Parcel # 985-10-201-08. The SIC Code is 4922. The source is situated in an area classified as "attainment" for all pollutants.

The source includes a natural gas fired turbine rated at 10,300 horsepower at 80° F. The turbine is fueled with pipeline quality natural gas, drawn from the natural gas pipeline.

Actual operations reflect prevailing market conditions, which may mean the facility could operate at full capacity, or stand idle for protracted periods.

The Oracle compressor station was built in March, 1971, prior to the existence of any local permit program. Permits #7323 and #7324 were issued in August, 1990, and (apparently) authorized installation of a regenerator and a 170 KW natural-gas-fired emergency generator

The District issued an initial operating permit for the station on August 24, 1990. That permit, coupled with Arizona Session Laws 1992, Chapter 299, §65, provided operating authority prior to issuance of this permit.

The facility's location in a historic SO<sub>2</sub> non-attainment area technically triggers a requirement to implement Reasonably Available Control Technology ("RACT"). The San Manuel SO<sub>2</sub> non-attainment area was redesignated to attainment in January 2008 with the submittal of an approved maintenance plan. This permit defines a maximum allowable fuel-sulfur content, which the District finds to constitute RACT for this source.

Renewal V20664.000 adds the provisions of 40 CFR 63 Subpart ZZZZ as they apply to the emergency generator, adds the opacity provision described in PCAQCD Code 5-23-1010, and moves blow down emissions from insignificant to reported.

The conversion of the facility to a simple-cycle configuration (processed through permit V20608.000) resulted in an increase, albeit a minor increase, in SO<sub>2</sub> emissions. Since the modification resulted in an increase in emissions Subparts A and GG of the New Source Performance Standards, 40 CFR §60.1 *et seq.*, were triggered. The facility falls subject to both the 40 CFR §60.332.a.2 standard for NO<sub>x</sub> and the 40 CFR §60.333 standard for SO<sub>2</sub>.

Given the lack of permit-imposed constraints, the source constitutes a "major source" for NO<sub>x</sub> within the meaning of CAA §302(j), which does trigger a requirement for an operating permit under CAA §501 *et seq.* Under the limitations of this permit, the source does not constitute a "major emitting source" for NO<sub>x</sub> within the meaning of 40 CFR §51.166.

Section 11 of this permit recites a list of emission-generating equipment, other than trivial or insignificant activities, covered under this permit.

**2. Listing of Federally Enforceable Applicable Requirements**

*[Mandated by 40 CFR §70.5(c)(4)]* (Code §§3-1-060.B.2.d, 3-1-081.A.2, 3-1-081.A.8.a)

- A. CAA §§608 & 611 (11/15/90); 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction (9/7/95); regulations pertaining to use and handling of ozone-depleting substances.
- B. In that this facility falls subject to regulation by the Department of Transportation under 49 CFR Part 192, this does not constitute a "stationary source" for purposes of regulation under CAA §112(r) (11/15/90) and 40 CFR Part 68 (1/31/94, amended 6/20/96), which impose requirements pertaining to an accidental release program.
- C. CAA §111 (11/15/90); 40 CFR Part 60, Subparts A and GG (as adopted or revised by the Administrator as of 1/1/96 and locally adopted under Code §§6-1-030.1 and 6-1-030.39); NSPS Subpart A General Provisions, Subpart GG Standards of Performance for Stationary Gas Turbines.
- D. The National Emissions Standards for Hazardous Air Pollutants ("NESHAP") 40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines (RICE) §§63.6580 – 63.6675 and Appendices
- E. General Provisions, 40 CFR 63, Subpart A, 40 CFR 63.1-63.15 provisions as listed in Table 8 of 40 CFR 63, Subpart ZZZZ, except as described in 40 CFR 63.6645(a)(5)
- F. Those specific provisions of the Pinal-Gila Counties Air Quality Control District ("PGCAQCD") Regulations, as adopted by the Pinal County Board of Supervisors on March 31, 1975, and approved by the Administrator as elements of the Arizona State Implementation Plan ("SIP") at 43 FR 50531, 50532 (11/15/78), and specifically the following rules:
  - 7-3-1.1 Emission Standards - Particulates - Visible Emissions - General
  - 7-3-1.2.A-D Emission Standards - Particulate Emissions - Fugitive Dust
  - 7-3-1.3 Emission Standards - Particulates - Open Burning
- G. Those specific provisions of the Pinal-Gila Counties Air Quality Control District Regulations, as last amended by the Pinal County Board of Supervisors on June 16, 1980, and approved by the Administrator as elements of the Arizona SIP at 47 FR 15579 (4/12/82), specifically, the following rules:
  - 7-1-1.3.C Air Pollution Prohibited
  - 7-3-1.1 Visible Emissions; General
  - 7-3-1.7.F Fuel Burning Equipment

**3. Compliance Certification**

- A. Compliance Plan  
*[Mandated by 40 CFR §70.5(c)(8)]* (Code §§3-1-081.C, 3-1-083.A.7)

Since the Permittee has certified that it is currently in compliance, Permittee shall adhere to and comply with the requirements of this permit as a prospective compliance plan.

- B. Compliance Schedule  
*[Mandated by 40 CFR §§ 70.5(c)(8), 70.6(c)(3)]* (Code §§3-1-060.B.1, 3-1-083.A.7.c)

Since the Permittee is currently in compliance, no compliance schedule to attain compliance is required.

#### 4. Authority to Construct

##### A. Generally

*[Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP element at 61 FR 15717 (4/9/96)]*

As an exercise of authority under PCAQCD's SIP-approved minor new source review program, this permit authorizes the construction of the equipment enumerated in the "Equipment Schedule" below. Emissions from this facility, specifically the emissions from the equipment described in the Equipment Schedule, and the operating configuration more fully described in the application for permit, fall subject to the independent Federally enforceable limitations identified elsewhere in this permit. Therefore, based on the regulations in effect upon the date of issuance of this permit and a finding that allowable emissions from the equipment described in the Equipment Schedule will neither cause nor contribute to a violation of any ambient air quality standard even without additional limitations, and a further finding that in view of this permit this does not constitute a "major emitting source" within the meaning of Code §3-3-203, this permit constitutes authority to construct and operate such equipment.

##### C. Minor New Source Review Requirements

*[Code §§3-1-010, 3-1-040 (as amended 10/12/95) approved as a SIP element at 61 FR 15717 (4/9/96)]*

1. The GE Frame 3-2H turbine shall be configured to operate in only a simple-cycle mode

##### D. Insignificant Activities

*(Code §§1-3-140.74a, 3-1-040.B.2.a.i, 3-1-050)*

Apart from the authority of this permit, Permittee is authorized to construct, modify or eliminate "insignificant activities," as defined in Code §1-3-140.74a. Appendix B of this permit includes a non-limiting schedule of specific activities that the District concurs qualify for "insignificant" status.

#### 5. Emission Limitations

*[Mandated by 40 CFR §70.6(a)(1)] (Code §3-1-081.A.2)*

##### A. Allowable Emissions

##### 1. General Limitation

*[Code § 3-1-040 (as amended 10/12/95) approved as a SIP Element at 65 FR79742 (12/20/2000)]*

Permittee is authorized to discharge or cause to discharge into the atmosphere those emissions of air contaminants as set forth below. Unless exempted under Code §3-1-040.C., or authorized by a separate permit, by this permit or by a revision or operational change allowed under Chapter 3, Article 2 of the Code, Permittee shall not commence construction of, operate or make any modification to this source in a manner which will cause potential emissions of any regulated air pollutant in excess of the 5.5#/day de minimis amount.

2. Insignificant Activities  
(Code §§1-3-140.74a, 3-1-040.B.2.a.i, 3-1-050)

Apart from the authority of this permit, and subject to a requirement that Permittee must still comply with any relevant applicable requirements, Permittee is authorized to discharge or cause to discharge into the atmosphere emissions from insignificant activities, as defined in Code §1-3-140.74a. Appendix B of this permit includes a non-limiting schedule of specific activities that the District concurs qualify for "insignificant" status.

B. Stationary Turbine Emission Limitation Standard for Nitrogen Oxides  
*[Code §6-1-030.38 and 40 CFR Part 60, Subpart GG, specifically 40 CFR §60.332]*

Permittee shall not discharge or cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of the limitations set forth in 40 CFR §60.332, namely 0.0150 percent by volume at 15 percent oxygen and on a dry basis<sup>1</sup>.

C. Stationary Turbine Emission Limitation Standard for Sulfur Dioxide  
*[Code §6-1-030.38 and 40 CFR Part 60, Subpart GG, specifically 40 CFR 60.333]*

Permittee shall not discharge or cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen on a dry basis.

D. Emission Limitation - NO<sub>x</sub> Emission Concentration  
(§5-24-1030.A.3) (NOT Federally enforceable.)

Nitrogen oxides shall not be emitted from the turbine(s) at a rate greater than 500 parts per million expressed as NO<sub>2</sub>.

E. NESHAP (Subpart ZZZZ) Standards - Stationary Reciprocating Internal Combustion Engines (RICE) NESHAP  
*[Federally enforceable; 40 CFR 63.6603.a, 63.6605, 63.6625.e, 63.6625.f, 63.6625.h, 63.6625.j, 63.6640.f, 40 CFR Part 63 Subpart ZZZZ Table 2d, Table 6]*

Owners and operators of emergency stationary RICE that commenced construction before June 12, 2006 shall comply with the following:  
(Emergency Generator)

1. Change the oil and filter every 500 hours of operation or annually, whichever comes first.  
or  
Conduct an oil analysis every 500 hours of operation or annually, whichever comes first. If the analysis demonstrates that any of the following parameters have been exceeded the oil must be changed within 2 business days of receiving the results or 2 business days before commencing operation of the engine, whichever is later. The oil must be changed if:  
Total acid number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new, or;

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<sup>1</sup> See Technical Support Document.

Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new, or;  
The percent water content (by volume) is greater than 0.5%

2. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
3. Inspect the hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
4. Maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
5. Install a non-resettable hour meter
6. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
  - a. For the purpose of demonstrating compliance with this provision, anytime the emergency engine is under load, it will be assumed that the engine is not at idle.
7. Operate the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions
8. Owners and operators of stationary Internal Combustion Engines (ICE) must limit annual calendar year hours of operation as follows to be considered an emergency stationary ICE.
  - a. Permittee may operate the emergency engine for the purpose of maintenance checks and readiness testing, provided the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, the regional transmission organization or the insurance company associated with the engine. Permittee shall not operate the ICE for the purposes of maintenance checks and readiness testing for more than 100 hours per year unless the Permittee maintains records identifying the Federal, State or local standards that require maintenance and testing of emergency internal combustion engines beyond 100 hours per year. Copies of such records shall be provided to the District upon request.
  - b. Non-emergency operation is limited to 50 hours per calendar year. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance, readiness checks, and demand response operation.
  - c. The 50 hours per calendar year for non-emergency operation cannot be used to supply power to another entity without a separate permit issued by the District.

F. Particulate Emissions Limitations

1. Opacity Limits

- a. SIP Limitation  
*[Federally enforceable pursuant to PGAQCD Reg. 7-3-1.1 (6/16/80) approved as a SIP Element at 47 FR 15579 (4/12/82)]*

The opacity of any plume or effluent shall not be greater than 40 percent as determined by EPA reference method 9 This requirement applies to the GE Turbine and the emergency generator.

- b. Performance Standard  
(Code §5-23-1010.C)

No person shall cause, allow or permit to be emitted into the atmosphere from any stationary rotating machinery, smoke for any period greater than 10 consecutive seconds which exceeds 40% opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes. This requirement applies to the GE Turbine and the emergency generator.

2. Mass Emissions Limitation

- a. SIP Limitation  
*[PGCAQCD Reg. 7-3-1.7 (3/31/75) approved as a SIP element at 43 FR 50531 (11/15/78)] [PGCAQCD Reg. 7-3-1.7 (amended 6/16/80) approved as a SIP Element at 47 FR 15579 (4/12/82)]*

For equipment with a heat input capacity of less than 4,000 million Btu per hour, particulate emissions shall not exceed:

$Y = 1.02X^{-0.231}$ , where Y = allowable rate of emission in pounds per million BTU, and X = maximum equipment capacity rate in million BTU per hour.

- b. Current Code Limitation  
(§5-23-1010)

For equipment with a heat input capacity of 4,200 million Btu per hour or less, particulate emissions shall not exceed:

$E = 1.02Q^{0.769}$ , where E = maximum emissions in lbs./hr. and Q = maximum heat input capacity in million BTU per hour.

3. Fugitive Emission Limitation  
*[PGCAQCD Reg. 7-3-1.2.A approved as a SIP element at 43 FR 50531 (11/15/78)]*

No person shall cause, suffer, allow or permit a building or its appurtenances or open area to be used, constructed, repaired, altered, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Dust and other types of particulates shall be kept to a minimum by such measures as wetting down, covering, landscaping, paving, treating or by other reasonable means.

4. Reasonable Precautions

**(§4-2-040) [Currently federally enforceable pursuant to PCAQCD Code 4-2-040 (4/27/04) approved as a SIP element at 75 FR 17307]**

- a. Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, subdivision site, driveway, parking area, vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, or fill dirt to be deposited, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- b. Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, such as but not limited to all-terrain vehicles, trucks, cars, cycles, bikes, or buggies, without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- c. Permittee shall not disturb or remove soil or natural cover from any area without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- d. Permittee shall not crush, screen, handle or convey materials or cause, suffer, allow or permit material to be stacked, piled or otherwise stored without taking reasonable precautions to effectively prevent fugitive dust from becoming airborne.
- e. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such a manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne. Other reasonable precautions shall be taken, as necessary, to effectively prevent fugitive dust from becoming airborne.
- f. Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to fugitive dust without taking reasonable precautions to prevent fugitive dust from becoming airborne. Earth and other material that is tracked out or transported by trucking and earth moving equipment on paved streets shall be removed by the party or person responsible for such deposits.
- g. Permittee shall not cause, suffer, allow or permit the use, repair, construction or reconstruction of any road or alley without taking every reasonable precaution to effectively prevent fugitive dust from becoming airborne.

**G. Fuel Use Limitations**

(§§5-23-1020.B, 5-24-1030.A.2)

1. Turbine Fuels  
(Code §3-3-250.A.1)

In the turbine unit(s), Permittee is allowed to burn exclusively pipeline quality natural gas having a sulfur content of 0.8% by weight or less.

2. Emergency Generator Fuels  
(Code §-5-23-1020)

In the emergency generator, Permittee is allowed to burn exclusively pipeline quality natural gas.

H. General Maintenance Obligation

(Code §§3-1-081.A.2, 3-1-081.A.8.a, 3-1-081.E.2, 3-1-081.E.1., approved as Title V permit program elements 61 FR 55910 (10/30/96); also see ARS §§49-481(A), 49-487(B))

At all times, including periods of start-up, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate the permitted facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

I. Voluntarily Accepted Federally Enforceable Emissions Limitations

[Code §3-1-084, approved as a SIP element at 61 FR 15717 (4/9/96)]

1. The emergency generator shall be equipped with an operable hour-meter.
2. Operation of the emergency generator shall be limited to not more than 500 hours in any 12-month period. For purposes of this limitation, compliance shall be assessed on the basis of a measurement of aggregate use during back-to-back semi-annual reporting periods.

J. Additional Plant-Wide Requirements

1. Asbestos NESHAP Compliance  
[40 CFR Part 61, Subpart M] (Code §§7-1-030.A.8, 7-1-060)

Permittee shall comply with Code §§7-1-030.A.8 and 7-1-060 and 40 CFR Part 61, Subpart M, as applicable, when conducting any renovation or demolition activities at the facility.

2. Stratospheric Ozone and Climate Protection  
[40 CFR Part 82 Subpart F] (Code §§1-3-140.15, 1-3-140.58.k)

The permittee shall comply with the applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

3. Sandblasting  
(Code §5-4-160.)

a. Permittee shall conduct all abrasive blasting in a confined enclosure unless either of the following occurs, in which case the blasting can be unconfined and in compliance with subsection b. below:

- i. The item to be blasted exceeds 8 ft in any one dimension; or,
- ii. The surface being blasted is fixed in a permanent location, cannot be easily moved into a confined enclosure, and the surface is not normally dismantled or moved prior to abrasive blasting.

- b. If unconfined blasting is conducted as allowed by subsection a., Permittee shall use at least one of the following control measures:
  - i. Vacuum collection system.
  - ii. Wet abrasive blasting.
  - iii. Hydroblasting.
  - iv. California Air Resources Board (CARB) approved low dust producing abrasives.
  - v. A control measure that is determined by the Control Officer to be equally effective to control particulate matter emissions.

4. Architectural Coatings  
(Code §5-12-370)

Permittee shall not employ, apply, evaporate or dry any architectural coating, as defined in §5-12-370.C, for industrial or commercial purposes, material containing photochemically reactive solvent as defined in §5-9-280 or shall thin or dilute any architectural coating with a photochemically reactive solvent.

5. Other Spray Painting  
(Code §5-13-390)

Permittee shall conduct spray painting operations except architectural coatings in an enclosed area designed to contain not less than 96% by weight of the overspray. An enclosed area means a 3-sided structure with walls a minimum of 8 feet high.

6. Disposal  
(Codes §5-12-370 and 5-13-390)

Permittee shall not, during any one day, dispose of a total of more than one and one-half gallons of any photochemically reactive solvent or of any material containing more than one and one-half gallons of any such photochemically reactive solvent by any means which will permit the evaporation of such solvent into the atmosphere.

**6. Compliance Demonstration**

*[Mandated by 40 CFR §70.6(c)]* (Code §§3-1-060.b.2.d, 3-1-081.A.2, 3-1-083)

A. Monitoring and Testing

*[Mandated by 40 CFR §70.6(a)(3)]* (Code §3-1-083)

1. Performance Test

*[Code §6-1-030.1, CAA §114 and 40 CFR §§60.8 and 60.335]*

a. Performance Test Schedule

i. Succeeding Tests

Permittee shall conduct performance tests on the turbine, for the purposes of verifying actual NO<sub>x</sub> emissions rates at least once during each permit term. Each test shall be conducted no later than 5 years from the previous one.

- If the facility is not in operation at the time a subsequent performance comes due, Permittee shall provide notice of that

situation to the Control Officer, and shall conduct a performance test within 60 days after the facility resumes operation.

b. Performance Test Mechanics

The tests shall be run:

- i. In accord with a District-approved test plan, which shall be submitted at least 30 days (or such other time as the Control Officer may approve in writing) prior to the scheduled test date;
- ii. With appropriate prior written notice to the District, which notice shall be not less than five (5) working days;
- iii. The performance tests shall be run at the maximum practical load possible;
- iv. Using the reference methods and procedures set forth in 40 CFR §60.335 and 40 CFR Part 60, Appendix A; or such other alternative reference methods and procedures as the EPA Administrator may approve in writing, provided copies of any such alternative and such Administrator-approval shall be included in the test plan submitted to the District.

c. Performance Test Report

Copies of the test report shall be submitted to the District, within forty-five (45) days after the test.

2. Parametric Emission Monitoring

***[Currently federally enforceable pursuant to PCAQCD Code 3-1-103 (2/22/95) approved as a SIP element at 65 FR79742]***

- a. Permittee shall maintain a record, accurately reflecting the aggregate quantity of fuel burned in turbine units during each calendar month.

b. Permittee shall maintain a record accurately reflecting the volume of gas vented during each blow down and shall report the associated emissions as part of the emission inventory.

3. Parametric emissions monitoring - sulfur dioxide  
[Code §3-3-260.G. and **40 CFR § 60.334**]

Permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine if such fuel meets the definition of natural gas in 40 CFR 60.331(u). Permittee shall use one of the following sources of information to make the required demonstration:

- a. The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or

- b. Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to 40 CFR part 75.

4. Opacity monitoring  
[Code §3-3-260.]

a. Turbine Emissions

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on each turbine stack. If visible emission are observed, Permittee shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days.

b. Open-area Fugitive Emissions

On at least a semi-annual basis, Permittee shall conduct a visual opacity screen performed on the open areas of the facility. If visible emissions are observed, Permittee shall have a full Method 9 opacity test performed by a certified opacity observer, and shall provide a copy of the resulting report to the District within 10 days.

5. Compliance Verification - Voluntarily Accepted Federally Enforceable Emissions Limitations

*[Code §3-1-084, approved as a SIP element at 61 FR 15717 (4/9/96)]*

- a. Permittee shall maintain an operating hour log reflecting use of the emergency generator.
- b. On a semi-annual basis, Permittee shall make a record of whether the emergency generator use conformed to the limitations of this permit, and shall report as part of the semi-annual compliance report whether or not such compliance was achieved.

6. Emergency Generator Records  
*[Federally enforceable; 40 CFR 63.6655]*

Permittee shall:

- a. Record the number of hours the engine operated for non-emergency and emergency situations and document what classified the operation as emergency.
- b. Keep records of maintenance conducted consistent with the manufacturer's instructions and documentation from the manufacturer that the engine is certified to meet the applicable emission standards
- c. Keep records of malfunctions, actions taken to minimize emissions and corrective actions.

B. Recordkeeping  
*[Mandated by 40 CFR §70.6(a)(3)]* (Code §3-1-083)

1. Recordkeeping protocol

- a. Permittee shall maintain required records in a permanent form, which may either written or electronic form, provided that written copies of electronic records shall be provided as required under this permit, or as requested by the District. Within the meaning of this provision, an electronic record is "permanent" if at any time during the required record retention period, it can printed out as hard copy.
- b. Permittee shall maintain the records either at the permitted facility, or, provided all records remain accessible as otherwise required under this permit, at:

EPNG Tucson Complex  
8787 North Pump Station Road  
Marana, Arizona 85653

2. Additional recordkeeping requirements

In addition to any records required under the monitoring provisions of this permit, Permittee shall:

- a. To the extent required by any express provision of this permit, maintain at the source, or such other location as may be expressly allowed under this permit, a file of all measurements, including continuous monitoring-system-, monitoring-device-, and performance- testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required pursuant to any provision of this permit, recorded in a permanent form suitable for inspection.
- b. Permittee shall maintain records of the occurrence and duration of any malfunction or period of excess emissions in the operation of the permitted facility or any air pollution control equipment. Copies of records which are maintained at a remote site shall be transmitted at least annually to the location mandated in Section 6.B.1.b. of this permit.

**7. Other Reporting Obligations**

- A. Deviation Reporting Requirements  
(Code §3-1-081.A.5.b) **[Mandated by 40 CFR §§70.6(a)(3)(iii)(B)]**

Permittee shall report any deviation from the requirements of this permit along with the probable cause for such deviation, and any corrective actions or preventative measures taken. Permittee shall provide such report to the District within ten days of when the Permittee first received notice, actual or constructive, of the deviation.

- B. Regular Compliance Reporting  
**[Mandated by 40 CFR §70.6(a)(3)]** (Code §3-1-083.A.3.a)

Permittee shall submit a semi-annual report containing a summary of the information required to be recorded pursuant to this permit, which summary shall clearly show whether or not Permittee

has complied with the operational requirements and emissions limitations under this permit. All instances of deviations from permit requirements shall be clearly identified in such reports. For brevity, such deviation reports may incorporate by reference any written supplemental upset reports or excess emission notifications filed by Permittee during the reporting period. The report shall be submitted to the District within 30 days after the end of each calendar half. Appendix A of this permit is a form which may be used for the report.

C. Regular Compliance/Compliance Progress Certification  
*[Mandated by 40 CFR §70.6(c)(5)]* (Code §3-1-083.A.4)

Permittee shall annually submit a certification of compliance with the provisions of this permit. The certification shall be separately submitted to both the District and to the Enforcement Office (AIR 5), EPA Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901. The certification shall:

1. Be signed by a responsible official, as defined in Code §3-1-030.18;
2. Identify each term or condition of the permit that is the basis of the certification;
3. State the compliance status with respect to each such term or condition;
4. State whether compliance with respect to each such term or condition has been continuous or intermittent;
5. Identify the method(s) used for determining the compliance status of the source, currently and over the reporting period; and
6. Be postmarked by January 30<sup>th</sup> of every year.

D. Annual emissions inventory  
[Code §§3-1-103, 3-7-590.C.1.]

Permittee shall complete and submit to the District an annual emissions inventory, disclosing actual emissions for the preceding calendar year. The submittal shall be made on a form provided by the District. The inventory is due by the latter of March 31, or ninety (90) days after the form is furnished by the District.

**8. Fee Payment**  
*[Mandated by 40 CFR §§70.6(a)(7), 70.9]* (Code §3-1-081.A.9)

As an essential term of this permit, an annual permit fee shall be assessed by the District and paid by Permittee in accord with the provisions of Code Chapter 3, Article 7 generally, and Code §3-1-081.A.9 specifically. The annual permit fee shall be due on or before the anniversary date of the issuance of an individual permit, or formal grant of approval to operate under a general permit. The District will notify the Permittee of the amount to be due, as well as the specific date on which the fee is due.

**9. General Conditions**

A. Term  
*[Mandated by 40 CFR §70.6(a)(2)]* (Code §3-1-089)

This permit shall have a term of five (5) years, measured from the date of issuance.

B. Basic Obligation

*[Mandated by 40 CFR §§70.4(b)(15), 70.6(a)(6)(i), 70.6(a)(6)(ii), 70.7.b]* (Code §3-1-081.)

1. The owner or operator ("Permittee") of the facilities shall operate them in compliance with all conditions of this permit, the Pinal County Air Quality Control District ("the District") Code of Regulations ("Code"), and consistent with all State and Federal laws, statutes, and codes relating to air quality that apply to these facilities. Any permit noncompliance is grounds for enforcement action; for a permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application and may additionally constitute a violation of the Clean Air Act (1990).
2. All equipment, facilities, and systems used to achieve compliance with the terms and conditions of this permit shall at all times be maintained and operated in good working order.
3. 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.

C. Duty to Supplement Application

*[Mandated by 40 CFR §§70.5(b), 70.6(a)(6)(v)]* (Code §3-1-081.A.8.e.)

Permittee shall furnish to the District within a reasonable time, which shall not exceed thirty days unless the Control Officer fixes some other time period for response, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking, reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required under this permit. For information claimed to be confidential, Permittee shall submit along with the requested information or records a showing as required under Code §3-1-120, and shall separately submit a full duplicate copy to the EPA Regional Office (Regional Administrator c/o Air Division Permits Office, EPA Region IX, 75 Hawthorne Street, San Francisco, CA 94105-3901).

D. Right to Enter

*[Mandated by 40 CFR §70.6(c)(2)]* (Code §§ 3-1-083.A.6, 3-1-132)

Authorized representatives of the District shall, upon presentation of proper credentials and while observing reasonable standard safety requirements as set forth by the owner or operator of the source, be allowed for purposes of ascertaining compliance with this permit and with other applicable requirements:

1. to enter upon the premises where the source is located, where emissions-related activity is conducted, or in which any records are required to be kept under the terms and conditions of this permit;
2. to have access to and copy, at reasonable times, any records that are required to be kept under the conditions of this permit;
3. to inspect, during normal business hours or while the source is in operation, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

4. to sample or monitor, at reasonable times, emissions from the source, or other substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
5. to record any inspection by use of written, electronic, magnetic and photographic media.

E. Transfer of Ownership  
*[Mandated by 40 CFR §70.7(d)(4)]* (Code §3-1-090)

This permit may be transferred under an administrative permit amendment from one person to another by notifying the District at least 30 days in advance of the transfer. The notice shall contain all the information and items required by Code § 3-1-090. The transfer may take place if not denied by the District within 10 days of the receipt of the transfer notification.

F. Posting of Permit  
(Code §3-1-100)

Permittee shall firmly affix the permit, an approved facsimile of the permit, or other approved identification bearing the permit number, upon such building, structure, facility or installation for which the permit was issued. In the event that such building, structure, facility or installation is so constructed or operated that the permit cannot be so placed, the permit shall be mounted so as to be clearly visible in an accessible place within a reasonable distance of the equipment or maintained readily available at all times on the operating premises.

G. Permit Revocation for Cause  
*[Mandated by 40 CFR §70.6(a)(6)(iii)]* (Code §3-1-140)

The Director of the District ("Director") may issue a notice of intent to revoke this permit for cause pursuant to Code §3-1-140, which cause shall include occurrence of any of the following:

1. The Director has reasonable cause to believe that the permit was obtained by fraud or material misrepresentation;
2. Permittee failed to disclose a material fact required by the permit application form or a regulation applicable to the permit;
3. The terms and conditions of the permit have been or are being violated.

H. Certification of Truth, Accuracy, and Completeness  
*[Mandated by 40 CFR §§70.5(a)(2), 70.6(a)(3)(iii)(B)] [Code §§3-1-083.A.5, 3-1-175 (as amended 10/12/95) approved as SIP Elements at 61 FR 15717 (4/9/96)]*

Any application form, report, or compliance certification submitted pursuant to the Code shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under Chapter 3 of the Code shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

I. Renewal of Permit  
*[Mandated by 40 CFR §§70.5(a)(1)(iii), 70.7(c)]* (Code §3-1-050.C.2)

For purposes of a Class I permit renewal, a timely application shall be submitted at least 6 months, but not greater than 18 months prior to the date of permit expiration.

J. Severability  
**[Mandated by 40 CFR §70.6(a)(5)]** (Code §3-1-081.A.7)

Pursuant to Code § 3-1-081.A.7., the provisions of this permit are severable, and if any provision of this permit is held invalid the remainder of this permit shall not be affected thereby.

K. Permit Shield  
**[Mandated by 40 CFR §70.6(f)]** (Codes § 3-1-102 and §3-1-081.D.)

1. Generally

Subject to the following schedule of exclusions, compliance with the terms of this permit shall be deemed compliance with any applicable requirement identified in this permit.

The permit-shield exclusions include:

- a. PGCAQCD Rule §7-2-1.8 ANTI-DEGRADATION;
- b. PGCAQCD Rule §7-3-1.3 OPEN BURNING;
- c. PGCAQCD Rule §7-3-4.1 INDUSTRIAL - CARBON MONOXIDE EMISSIONS.

2. Additional Inclusions Under the Permit Shield

The permit shield also extends to the following provisions of the code, due to a finding by the Control Officer of non-applicability:

- a. Code §§5-22-950, 5-22-960 & 5-22-970, all dealing with Fossil Fuel-Fired Steam Generators.

L. Permit Revisions  
**[Mandated by 40 CFR §70.7(d), 70.7(e)]** (Code Chapter 3, Article 2, specifically Code §3-1-081.A.8.c)

1. This 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, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
2. Permit amendments, permit revisions, and changes made without a permit revision shall conform to the requirements in Article 2, Chapter 3, of the Code.

M. Permit Re-opening  
**[Mandated by 40 CFR §§70.6(a)(6)(iii), 70.7(f), 70.7(g)]** (Code §3-1-087.)

1. This permit shall be reopened if:
  - a. Additional applicable requirements under the Clean Air Act (1990) become applicable to this source, and on that date this permit has a remaining term of three or more years. However, no such reopening under this subparagraph is required if the effective date of the newly applicable requirement is later than

the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to Code §3-1-089.C.

- b. The Control Officer determines that it contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of it;
- c. The Control Officer determines that it needs to be revised or revoked to assure compliance with the applicable requirements; or
- d. The EPA Administrator finds that cause exists to terminate, modify, or revoke and reissue this permit.

- 2. If this permit must be reopened or revised, the District will notify the permittee in accord with Code §3-1-087.A.3.

N. Record Retention  
*[Mandated by 40 CFR §70.6(a)(3)(ii)(B)]* (Code §3-1-083.A.2.b)

Permittee shall retain for a period of five (5) years all documents required under this permit, including reports, monitoring data, support information, calibration and maintenance records, and all original recordings or physical records of required continuous monitoring instrumentation.

O. Scope of License Conferred  
*[Mandated by 40 CFR §70.6(a)(6)(iv)]* (Code §3-1-081.A.8.d)

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

P. Excess Emission Reports; Emergency Provision  
*[Mandated by 40 CFR §70.6(g)]* (Code §3-1-081.E, Code §8-1-030, A.R.S. §49-514(P))

- 1. To the extent Permittee may wish to offer a showing in mitigation of any potential penalty, underlying upset events resulting in excess emissions shall reported as follows:
  - a. The permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. Such report shall be in two parts:
    - i. Notifications by telephone or facsimile within 24 hours or the next business day, whichever is later, of the time when the owner or operator first learned of the occurrence of excess emissions, including all available information required under subparagraph b. below.
    - ii. Detailed written notification within 3 working days of the initial occurrence containing the information required under subparagraph b. below.
  - b. The excess emissions report shall contain the following information:
    - i. The identity of each stack or other emission point where the excess emissions occurred.

- ii. The magnitude of the excess emissions expressed in the units of the applicable limitation.
  - iii. The time and duration or expected duration of the excess emissions.
  - iv. The identity of the equipment from which the excess emissions occurred.
  - v. The nature and cause of such emissions.
  - vi. 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.
  - vii. The steps that were or are being taken to limit the excess emissions. To the extent this permit defines procedures governing operations during periods of start-up or malfunction, the report shall contain a list of steps taken to comply with this permit.
  - viii. To the extent excess emissions are continuous or recurring, the initial notification shall include an estimate of the time the excess emissions will continue. Continued excess emissions beyond the estimated date will require an additional notification.
2. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires 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.
3. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of the following subparagraph are met.
4. 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 at the time being properly operated;
  - c. During the period of 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 Control Officer by certified mail or hand delivery within 2 working days of the time when emissions limitations were exceeded due to emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

**10. Provisions Specifically Designated as Not Federally Enforceable**  
(Code §3-1-081.B.2)

Subject to the following specific exclusions, all terms and conditions of this permit are enforceable by the Administrator and citizens under the Clean Air Act. The exclusions include:

- A. Section 1. Introduction
- B. Section 4.C Authority to Construct; Insignificant Activities
- C. Section 5.D Emission Limitation - NO<sub>x</sub> Emission Concentration
- D. Section 5.F.1.b Opacity performance standard
- E. Section 5.F.2.b Mass emission limitation; Current Code Limitation (§5-23-1010)
- F. Section 5.G Fuel Use Limitations
- G. Section 9.F Posting of Permit

**11. Equipment Schedule**  
*[Mandated by 40 CFR §70.5(c)(3)(iii)]* (Code §3-1-040.A)

Equipment for which emissions are allowed by this permit are as follows:

- 1. GE Frame 3-2H Turbine - Serial No. 214251, 10,300 HP. at site elevation and 80 °F
- 2. Onan Emergency Generator, 170 KW powered by a Waukesha Model F1197GU Engine, Serial No. 191532, 290 HP, Model year 1953

**Appendix A: Semi-annual Report**

**Permit V20664.000**

**Abstract**

This constitutes a semi-annual report of all required monitoring, documenting emissions during the subject reporting period.

**Reporting Period** - January-June \_\_ Or July-December \_\_ Year \_\_\_\_\_

**Facility** - El Paso Natural Gas Co.  
Oracle Compressor Station  
T9S, R16E, Sec 30, Pinal County, Arizona

**Parametric emissions report**

Natural gas burned during reporting period..... \_\_\_\_\_ scf  
*or*  
\_\_\_\_\_ therms

Natural gas vented during blow downs..... \_\_\_\_\_ scf

**Operations report**

Was the maintenance performed on the generator as required under §5.E? ..... YES / NO

Has testing been completed on the turbines within the last 60 months or as otherwise required by §6.A?  
..... YES / NO

Have the records required under §6.A.3 (fuel sulfur content) been maintained? ..... YES / NO

Have the opacity screenings required under §6.A.4 been conducted? ..... YES / NO

Have the records required under §6.A.5 and §6.A.6 (generator use) been maintained?..... YES / NO

Do those records show compliance with the generator-use limits of §5.E.8 and §5.I? ..... YES / NO

Have records been maintained as required under §6.B?..... YES / NO

Were any deviations recorded and if so were they reported as required under §7.A ..... YES / NO

On a separate sheet, describe and explain any previously un-reported deviations from the terms of this permit. Is such a supplemental disclosure attached?..... YES / NO

On a separate sheet, describe and explain any monitoring activity or recordkeeping that occurred with respect to the Asbestos NESHAP or Stratospheric Ozone requirements respectively defined in §§5.J.1 and 5.J.2 of the permit during the reporting period.

Is such a supplemental disclosure attached?..... YES / NO

**Certification by Responsible Official**

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I certify that, based on information and belief formed after reasonable inquiry, that the statements and information in this report are true, accurate and complete.

Signed \_\_\_\_\_

Printed Name \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

Contact Phone Number \_\_\_\_\_

**Mail to -** Pinal County Air Quality Control District  
PO Box 987  
Florence, AZ 85132

**Appendix B: Insignificant Activities**

A. General information (Code §§ 1-3-140.74A, 3-1-050, & 3-3-081)

1. An insignificant activity is one which is not subject to any applicable requirements and which accounts for less than 1 percent of a source's emissions of conventional air pollutants or generates less than 200 pounds per year of regulated air pollutants. Additionally, an activity specifically listed as such in the Code is insignificant.
2. Permit application need not provide emissions data regarding insignificant activities and such activities need not be listed in the permit. Insignificant activities need only be listed in the permit application.

B. Non-exclusive list of insignificant activities.

Activities which may generate emissions in insignificant amounts include but are not limited to the following:

1. Short term maintenance activities including but not limited to:
  - a. Steam cleaning
  - b. Equipment removal and replacement
2. Operation of Oil/Water Systems/Scrubber Liquid Systems
3. Operation of cooling water, plant water, wastewater, and other water systems.
4. Emissions from testing and sampling.
5. Emissions from oil systems and tanks.
6. Cathodic Protection System
7. Operation of battery systems
8. Operation of natural gas-fired appliances rated less than 1 mmbtu/hr.
9. Operation of vents, valves, and flanges.
10. Diesel and fuel oil storage tanks with capacity of 40,000 gallons or less, and lubricating oil storage tanks with capacity of 40,000 gallons or less and vapor pressure less than 1.5psia.
11. Normal landscaping, building maintenance or janitorial activities.