

**Technical Review and the Evaluation of the
Application for Air Quality Minor Permit
Revision Number 39756**

I. INTRODUCTION

This Class I Minor Revision is being issued to El Paso Natural Gas Company, the Permittee, for the replacement of the existing emergency generator rated at 74 Horsepower with another generator rated at 184 Horsepower. The facility is located in Flagstaff, Coconino County, Arizona. The facility was issued a Class I permit (Number 27931) in April 2004 for the operation of a natural gas compressor station..

II. EMISSIONS

The emissions from the generator replacement are listed in Table 1 below:

Table 1 – Total and Net Emissions Increase in Tons per Year for the Generator Replacement

Emissions (TPY)	New Genset (184 HP)	Existing Genset (74 HP)	Net Emissions Increase
CO	5.39	2.17	3.22
NO _x	24.98	10.05	14.93
SO _x	1.61	0.65	0.96
VOCs	2.01	0.81	1.20
PM	1.77	0.71	1.06
PM ₁₀	1.77	0.71	1.06

III. PERIODIC MONITORING

No changes in the periodic monitoring are occurring as part of this minor revision.

IV. MONITORING REQUIREMENTS

No monitoring changes are being made as part of this minor revision.

V. TESTING REQUIREMENTS

No changes in testing requirements are being made as part of this minor revision.

VI. MINOR REVISION GATEKEEPERS

The Department has determined that this revision meets the requirements of a minor revision. Each minor revision trigger is listed below along with a discussion of why this revision meets those triggers.

1. Does not violate any applicable requirement;

There are no changes to any of the applicable requirements as a result of the change.
2. Does not involve substantive changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

There are no changes to monitoring, reporting, or recordkeeping requirements as a result of the change.

- 3. Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

The revision does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis.

- 4. Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. The terms and conditions include:

The revision does not establish or change a permit term or condition. The revision updates the emergency generator information.

- 5. Are not modifications under any provision of Title I of the Act;

The change is not a modification under any provision of Title I of the Act.

- 6. Are not changes in fuels not represented in the permit application or provided for in the permit;

There are no changes in fuels associated with this minor revision.

- 7. The increase in the source's potential to emit any regulated air pollutant is not significant as defined in R18-2-101;

The revision does not increase the potential to emit of any regulated pollutant above the significance level as listed in A.A.C R18-2-106.

- 8. Are not required to be processed as a significant revision under R18-2-320.

A.A.C. R18-2-320 does not require this revision to be processed as a significant revision.

VII. LIST OF ABBREVIATIONS

A.A.C. Arizona Administrative Code
ADEQ Arizona Department of Environmental Quality

CO..... Carbon Monoxide
EPA..... Environmental Protection Agency
NO_x..... Nitrogen Oxides
PM..... Particulate Matter
PM₁₀..... Particulate Matter Nominally less than 10 Micrometers
SO_x..... Sulfur Oxides
TPY..... Tons per Year
VOC..... Volatile Organic Compound