RESPONSIVENESS SUMMARY

To EPA Comments on Proposed Title V Permit
During Official 45-Day EPA Review Period
(March 15, 98 to April 30, 98)
for
Air Quality Control Permit Nos. 1000151 & 1000178
All American Pipeline Company
La Paz & Hot Springs Pumping Station

The followings are EPA comments of April 15, 1998:

Comment 1: *Attachment A.III.C. Permit Revision, Reopening, etc. The last sentence of this section should refer to paragraph III.B.1 instead of II.B.1*

Response: The change has been made.

Comment 2: *Attachment B.I.A.3 Natural Gas-fired solar Centaur Turbine Engines. The origin of authority for this conditions is unclear. If this limit originates in a pre-construction (PSD) permit then the pre-construction permit number should be cited, rather than citing 40 CFR 52.21. If this condition is imposed to assure compliance with other applicable limits in the title V permit, the citation should be R18-2-306.A.2., which requires the inclusion of "enforceable emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements."*

Response: The citation has been changed to R18-2-306.A.2.

Comment 3: *Attachment B.I.A.4. Natural Gas-Fired Solar Centaur Turbine Engines. The citation given for this condition (40 CFR 60.8) refers only to initial performance tests and does not contain any authority to limit operating parameters such as pumping capacity. From the explanation given in the technical support document, it appears this condition is intended to prevent the facility from exceeding the pumping capacity at which it was tested. This would be presumably to avoid exceeding the NOx emission limit. Since NOx emissions are determined by the percent load on each turbine, rather than the pumping capacity of the entire facility, this condition limiting pumping capacity of the entire facility does not limit the overall NOx emissions. However, EPA agrees with the concept of limiting a source to operate only under the conditions which have been measured in a performance test. This coordination of operating conditions and testing conditions is assured by the NSPS testing provisions of 40 CFR 60.335. These require a source to test at 30, 50, 75, and 100% load, or at four points in the normal operating range including the peak load. Thus, please make the corrections described in comment # 8 below to assure this requirement is*

met. Further, while this permit condition limiting pumping capacity does not limit NOx, we realize ADEQ may have included this condition because it is contained in an installation permit. If the condition is retained for this reason, please cite the installation permit as the origin of authority.

Response: The requirement to limit the capacity of the equipment is based on the ADEQ Air Quality Division policy which states that if the performance test is conducted at below maximum capacity, the source will be limited to operate at that capacity until tested again. The purpose for this limitation is that the source showed compliance with the applicable standard at a lower capacity rather than a maximum capacity. In the case of AAPL, the test was conducted at a lower capacity due to a physical limitation. Therefore, the pumping capacity limits are placed on the turbines.

Comment 4: Attachment B.I.B.2. G.C. Broach Heaters. This permit condition limits the in-line heater to "15 percent opacity measured in accordance with EPA Reference Method 9". As written, this could be read to imply an exclusive link between the emission limit and the method of determining compliance. Conditions in a Title V permit cannot limit the types of data or information that may be used to prove a violation of any applicable requirement, i.e., restrict the use of any credible evidence. To correct this problem, emission limits should be separated from the required method of monitoring by placing each in its respective section of the permit. Because no Method 9 tests will be required for this facility, simply removing the language referring to Reference Method 9 from the Emission Limits/Standards section will correct this problem. Also, not that when the SIP language itself links an emission limit with a specific test method, the SIP overrides any language in the permit. Thus, EPA will not comment on permit language quoted directly from the rule in the SIP. However, we still encourage ADEQ to separate emission limits from test methods.

Response: ADEQ agrees with the EPA on this comment. Condition I.B.2 of Attachment B has been revised to read as follows:

"Permittee shall not cause, allow or permit to be emitted into the atmosphere from the In-line heater, smoke which exceeds 15 percent opacity."

Comment 5: Attachment B.I.C.1.a. Open areas, Roadways, and Streets. This condition could create a problem by excluding credible evidence, as described in comment #2 above. However, unlike the case above, the test method is actually cited in the SIP rule itself. While we stated we cannot require a separation of the limit and the monitoring method in this situation, the language in the permit should be revised to match the language in the SIP rule exactly ("greater than 40% measured <u>in accordance with the Arizona Testing Manual, Reference Method 9</u>"). We recognize this seems like a very trivial change, but have received guidance from within the EPA that the language "measured in accordance with" matches the language in the

NSPS 40 CFR 60.8 directly, and is somehow more acceptable.

Response: ADEQ agrees with the EPA on this comment. Condition I.B.1.a of Attachment B has been revised to read as follows:

"Visible emissions from open areas, roadways, and streets shall not have an opacity greater than 40% measured in accordance with the Arizona Testing Manual, Reference Method 9."

Comment 6: Attachment B.II.B Fuel Nitrogen Content. Since the waiver of the fuel nitrogen monitoring requirement is clearly explained in the technical support document, we recommend removing this condition altogether from the permit to avoid confusion for the source.

Response: Condition II.B of Attachment B has been removed.

Comment 7. Attachment B.III. Reporting Requirements. Reports of required monitoring must be submitted every 6 months, pursuant to A.A.C. R18-2-306.A.5.a. As described in the preamble to 40 CFR Part 70, these reports must include all recordkeeping performed in place of monitoring, i.e., (for this permit) records of dust control measures required by Section II.F.1. Please add a new provision (III.B.3) requiring the Permittee to submit a report, at least every 6 months, of all records required under Section II.B. This citation for the new condition should be A.A.C. R18-2-306.A.5.a. For convenience, this requirement may be timed to coincide with the compliance certifications required by Section VII of Attachment A.

Response: ADEQ agrees with the EPA on this comment. A new condition III.B.3 has been added to the permit. Section III.B.3 reads as follows:

AAt the time the compliance certifications required by Section VII of Attachment AA@ are submitted, the Permittee shall submit reports of all monitoring activities required by Section II of this Attachment performed in the six months prior to the date of the report."

Comment 8: Attachment B.IV.A. Testing Requirements. We do not feel that an annual representative source test from one unit will assure compliance with the applicable NOx limit for all untested units. Because we have no data demonstrating the performance of the three turbines is correlated, the proposed testing schedule essentially require ,.ms a performance test every third year for each turbine. As a general starting point for gas turbines, EPA has required at least a yearly source test to meet Part 70 requirements for periodic monitoring. However, because the frequency of periodic monitoring should be related to the likelihood of a violation, we are willing to discuss the use of previous performance test results to develop an

alternative periodic monitoring schedule. Please propose a new performance test schedule in accordance with this comment. As guidance showing the minimum monitoring that would fulfill the requirements of Part 70, we have attached the conditions agreed upon for similar All American facilities in Pinal County. Note that ADEQ's proposed testing schedule is less stringent than the attached schedule. According to the attached schedule, a test every three years would only be allowed if the previous test showed results of less than 60 % of the limit. The most recent data we have for testing at La Paz Pumping Station (5/22/97) shows the source was at 69% of their limit, operating at only 56 % load. Also, regardless of testing frequency, the tests must be performed in accordance with the Subpart GG (40 CFR 60.335), including the load specifications. Please add the following language "Performance testing on these gas turbine engines shall be conducted in accordance with the requirements of 40 CFR 60.335, and in accordance with the requirements of Attachment A, section XVII of this permit." Also, please remove the citation to 40 CFR 60.8 since this rule only applies to performance tests required at the initial startup of equipment.

Response: Per EPA's suggestion, ADEQ agrees to include the language from Pinal County's permit so as to be consistent.

For succeeding tests, a new condition IV.B has been revised to read as follows:

"Succeeding Tests

Subsequent testing frequency for the turbine units shall constitute a function of the initial test results, relative to the NOx concentration, as follows:

1. If the prior test indicated actual emissions at over 85% of the NSPS allowable, the unit shall be tested again not later than 12 months after the initial test;

2. If the prior test indicated actual emissions under 85%, but at or over 60%, of the NSPS allowable, the unit shall be tested again not later than 24 months after initial test;

3. If the prior test indicated actual emissions under 60% of the NSPS allowable, the unit shall be tested again not later than 36 months after initial test.

4. EPA Reference Method 20, or other equivalent test method with prior approval from the Director, shall be used to determine emissions of nitrogen oxides from the stationary gas turbine engines.

5. The Performance testing on these gas turbine engines shall be conducted in accordance with the requirements of 40 CFR 60.335, and in accordance with the

requirements of Attachment A, section XVII of this permit.

Comment 9: *Initial Performance Tests. From the data that EPA has on the initial performance tests(10/12/90), it appears that each turbine was only tested at one load condition. The NSPS Subpart GG (40 CFR 60.335) requires testing at four load conditions. Please either provide information on additional tests performed on 10/12/90, or add a compliance schedule to properly implement the initial performance test requirements, and add a schedule for submission of certified progress reports, as required by R18-2-309.5.c.iii.and R18-2-309.5.d., respectively.*

Response: ADEQ is still evaluating this comment.

The following is EPA Comment of April 28, 1998:

> *Also, the requirement to submit certified progress reports (citation R18-2-309.5.d) should be added to the Reporting Section (III) of the specified conditions, conveying the following information:*
>
> *Permittee shall submit a certified progress report on the schedule of compliance for the initial performance test requirements at least every 6 months, until the violation is remedied and has been reported as such. The report shall include 1) the required dates for performing the testing and the dates when the testing was performed, and 2) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.*

Response: ADEQ is still evaluating this comment.

AQD:PS:19821

February 22, 1999

Matt Haber, Chief
Air Permits Section
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Haber:

Subject: Response to EPA formal objection for Permit #1000151 and #1000178

This letter is in response to the letter of formal objection received by the EPA on April 30, 1998. The letter of objection addressed the proposed Title V permits for the following facilities:

All American Pipeline Company (AAPL) La Paz Pumping Station (#1000151)
All American Pipeline Company (AAPL) Hot Springs Pumping Station (#1000178)

The basis of the formal objection was that the applicable turbines at the crude oil pumping stations listed above have not performed an initial performance test in accordance with 40 CFR 60, Subpart GG. As a result of meetings with both EPA and AAPL, the following sections have been revised to include conditions which address this issue:

- Section IV "Testing Requirements",
- Section I.A.4 "Pumping Rate Limitation, and
- Section II.B "Monitoring and Recordkeeping Requirement"

Enclosed with this letter is the revised permit. New conditions have been redlined for review.

ADEQ appreciates the time and dedication that EPA staff members have provided to resolve this issue. We look forward to working with you in the future as we continue with our Title V permit program. If you have any questions, please contact David Browner at (602) 207-4483 or myself at (602) 207-2329.

Sincerely,

Prabhat Bhargava, Manager
Permits Section, Air Quality Division

PB1:CZL:czl

Enclosures: Attachment "B" of proposed permits nos. 1000151 & 1000178