



**PIMA COUNTY**  
ENVIRONMENTAL QUALITY  
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Tucson, Arizona 85701-1429  
[www.deq.pima.gov](http://www.deq.pima.gov)

Ursula Kramer Nelson, P.E.  
Director

(520) 724-7400  
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March 9, 2020

El Paso Natural Gas Company, L.L.C. (EPNG)  
Philip Baca, Director  
5151 E. Broadway, Suite 1680  
Tucson, AZ 85711

[Philip\\_Baca@kindermorgan.com](mailto:Philip_Baca@kindermorgan.com)

Subject: Air Quality Permit Revision Application - Vail Compressor Station  
Administrative Completeness Determination  
Permit No. 425

Dear Mr. Baca:

On 10 February 2020, the Pima County Department of Environmental Quality (“PDEQ”) received an Application for a Prevention of Significant Deterioration (PSD) Authorization and Significant Revision to Class I Air Quality Permit for the Vail Compressor Station (“VCS”) located at 10200 S. Rita Road in Tucson, Arizona. PDEQ has reviewed the application and found the application to contain sufficient basic information to begin technical review of the permit application. The permit application is, therefore, deemed administratively complete. Attachment A contains the completeness checklist used to assess the application.

Should you have any questions, please do not hesitate to contact me at (520)724-7341.

Sincerely,



Rupesh Patel  
PDEQ Air Program Manager

Copies to: Donald Cantrell, Plant Manager, EPNG, [Donald\\_Cantrell@kindermorgan.com](mailto:Donald_Cantrell@kindermorgan.com)  
Weiwen Daly, Air Permitting Compliance - West, EPNG,  
[Weiwen\\_daly@kindermorgan.com](mailto:Weiwen_daly@kindermorgan.com)

Kate Graf, Geosyntec Consultants

Attachment A – Administrative Completeness Checklist

**ATTACHMENT A**

**ADMINISTRATIVE COMPLETENESS  
CHECKLIST**

**PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY PERMIT APPLICATION COMPLETENESS CHECKLIST FOR CLASS I**

SOURCE/ APPLICANT: El Paso Natural Gas Company, L.L.C – Vail Compressor Station  
Piping Modification Project (425-0104P)  
Class I, Title V, Part 70 Air Quality Permit

Permit #	<u>425</u>
New Source	<u>          </u>
Renewal	<u>          </u>
Revision	<u>  X  </u>

\* - To be used with Standard Permit Application Form Filing Instructions

REFERENCE	REQUIREMENT	MEETS REQUIREMENT?			Remark #	Reviewer
		Y	N	NA		
App Form	Has the Standard Application Form been completed?	X				PDEQ
App Form	Has the responsible official signed the application form?	X				PDEQ
PCC 17.12.510	Have the appropriate application fees been included with the application, if required?			X	A	PDEQ
PCC 17.12.160(h)	Has a Certification of Truth, Accuracy and Completeness been included?	X				PDEQ
Filing Instructions 1.	Has a description of each process unit been included?	X				PDEQ
Filing Instructions 2.	Has a product and raw material description been included?	X				PDEQ
Filing Instructions 3 & 4.	Has a complete description of Alternate Operating Scenarios and products been included? (if applicable)			X	B	PDEQ
Filing Instructions 5.	Has a Flow Diagram for all processes been provided?	X				PDEQ
Filing Instructions 6.	Has a Material Balance been included (optional, only if emission calculations are based on material balance)?			X		PDEQ
Filing Instructions 7.	Has the Emission Sources form been completed and does it include potential emissions of regulated air pollutants (including fugitives)?	X				PDEQ
Filing Instructions 8.	Have all applicable SIP requirements been identified?		X		C	PDEQ
Filing Instructions 8.	Have all applicable NSPS requirements been identified?	X				PDEQ
Filing Instructions 8.	Have all applicable NESHAP requirements been identified?	X				PDEQ
Filing Instructions 8.	Have all applicable Installation/Operating Permit requirements been identified?	X				PDEQ
Filing Instructions 9.	Have any proposed exemptions and insignificant activities been included (if applicable)? If so, has the applicant provided sufficient evidence?	X				PDEQ
Filing Instructions 10.a, 10.c	Have the maximum annual and hourly process rates for each piece of equipment which generates air emissions been included?	X				PDEQ

REFERENCE	REQUIREMENT	MEETS REQUIREMENT?			Remark #	Reviewer
		Y	N	NA		
Filing Instructions 10.b, 10.d	Have the maximum annual and hourly process rates for the whole plant been included?	X				PDEQ
Filing Instructions 10.e	Has the fuel type and maximum usage (hourly and annual) information been included?	X				PDEQ
Filing Instructions 10.f	Has the raw material maximum hourly, monthly or quarterly and annual usage information been included?			X		PDEQ
Filing Instructions 10.g	Have the Operating Schedules (hour/day, days/year, days/week, % annual production by season) been included?	X				PDEQ
Filing Instructions 10.h	Have any limitations on operations and work practice standards affecting emissions been included (if applicable)?	X				PDEQ
Filing Instructions 11	Does the application include an equipment list with the type, name make, model, serial number, and date of manufacture?	X				PDEQ
Filing Instructions 12	Does the application include the necessary stack information including: stack identification, description, exit height, inside dimensions, exit gas temperature and velocity, and building dimensions?	X				PDEQ
Filing Instructions 13	Does the application include a site diagram which includes: property boundaries, adjacent streets/roads, directional arrow, elevation, equipment layout, location of emission points, emission areas and air pollution control equipment and the closest distance between emissions and property boundary?	X				PDEQ
Filing Instructions 14.a	Have the applicable test methods for determining compliance been included?	X				PDEQ
Filing Instructions 14.b	Does the application include an identification, location and description of Pollution Controls?	X				PDEQ
Filing Instructions 14.c	Has the rated and operating efficiency of pollution controls been included?			X		PDEQ
Filing Instructions 14.d	Has the data used to establish efficiency been provided?			X		PDEQ
Filing Instructions 14.e	Has evidence that the new or modified source will not violate any Ambient Air Quality Standards or PSD increments been provided?	X				PDEQ
Filing Instructions 16.a-d (ACID RAIN)	Has a Compliance Plan been included? (The compliance plan must address acid rain provisions, if applicable – 17.12.365 & Title IV of CAA)			X		PDEQ
Filing Instructions 16.a	Does the application include a description of the Compliance Status of the source with respect to all applicable requirements (for constructed/operating sources)?			X		PDEQ
Filing Instructions 16.a 16.b	Has a description of how the new source or alteration will comply with applicable requirements been included (for new sources or modifications to existing sources)?	X				PDEQ
Filing Instructions 16.b.i	Does the application include a statement that the source will continue to comply with the applicable requirements with which they currently comply? (for constructed/operating sources)	X				PDEQ

REFERENCE	REQUIREMENT	MEETS REQUIREMENT?			Remark #	Reviewer
		Y	N	NA		
Filing Instructions 16.b.ii	Has a statement that the source will meet requirements which become effective before or after permit issuance been included?	X				PDEQ
Filing Instructions 16.b.iii	Has a compliance schedule with remedial measures, and an enforceable sequence of actions with milestones leading to compliance been included for applicable requirements with which the source does not currently comply?			X		PDEQ
Filing Instructions 16.c	Has a Schedule for Submission of Progress Reports (at least every 6 months) been included? (for sources required to have a compliance schedule)			X		PDEQ
Filing Instructions 17	Has a Compliance Certification by a responsible official been included?	X				PDEQ
Filing Instructions 17.a.i	Does the application include an identification of the applicable requirements which are the basis of the certification?	X				PDEQ
Filing Instructions 17.a.ii	Has a Statement of Methods Used to Determine Compliance been included?	X				PDEQ
Filing Instructions 17.a.iii	Has a Schedule for Submission of Compliance Certifications (at least annually) been provided?	X				PDEQ
Filing Instructions 17.a.iv	Does the application include a statement indicating the compliance status with respect to any applicable enhanced monitoring and compliance certification requirements? (if applicable)	X				PDEQ
Filing Instructions 17.b	Does the application include an acid rain compliance plan? (if applicable)			X	D	PDEQ
Filing Instructions 19	Have the calculations on which all information is based been included in the application?	X				PDEQ

**SUPPLEMENTAL CHECKLIST  
FOR NEW MAJOR SOURCES OR MAJOR MODIFICATIONS  
TO SOURCES LOCATED IN NON-ATTAINMENT AREAS**

REFERENCE	REQUIREMENT	MEETS REQUIREMENT?			Remark #	Reviewer
		Y	N	NA		
Filing Instructions 18.a.i	Does the application include a LAER (Lowest Achievable Emission Rate) determination and the data and information used to determine LAER?			X		PDEQ
Filing Instructions 18.a.ii	Has a certification pursuant to 17.16.560.A.2 been included? Such certification should list and describe all existing major sources owned and operated by the applicant and a statement of compliance.			X		PDEQ
Filing Instructions 18.a.iii	For sources subject to the offset requirements of 17.16.560.A.3, does the application include a demonstration of the manner in which the source or modification meets the requirements of 17.16.570?			X		PDEQ
Filing Instructions 18.a.iv	Does the application include the analysis described in 17.16.560.B, if required (only for VOC or CO sources in photochemical oxidant or CO Non-attainment areas)?			X		PDEQ

**SUPPLEMENTAL CHECKLIST  
FOR NEW MAJOR SOURCES OR MAJOR MODIFICATIONS  
TO SOURCES LOCATED IN ATTAINMENT AREAS**

REFERENCE	REQUIREMENT	MEETS REQUIREMENT?			Remark #	Reviewer
		Y	N	NA		
Filing Instructions 18.b.i	Does the application include a demonstration of the manner in which the new source or modification will meet the requirements of 17.16.590?	X				PDEQ
Filing Instructions 18.b.ii	Does the application include a BACT (Best Available Control Technology) determination and the data and information used to determine BACT?	X				PDEQ
Filing Instructions 18.b.iii	Does the application include an air impact analysis as per 17.16.590 and 17.16.600?	X				PDEQ
Filing Instructions 18.b.iv	If the applicant seeks an exemption from any of the requirements of 17.16.590, does the application include sufficient information to demonstrate compliance with the requirements of the subsections under which an exemption is sought?	X				PDEQ

**SUPPLEMENTAL CHECKLIST  
FOR APPLICATIONS WHICH INCLUDE A NOTICE OF CONFIDENTIALITY**

REFERENCE	REQUIREMENT	MEETS REQUIREMENT?			Remark #	Reviewer
		Y	N	NA		
PCC 17.12.170	Does the notification precisely identify information in the application which is to be considered confidential?			X		PDEQ
PCC 17.12.170	Does the notification contain sufficient supporting information to allow the Control Officer to evaluate whether the information satisfies the requirements related to trade secrets or, if applicable, how the information, if disclosed, is likely to cause substantial harm to the person's competitive position?			X		PDEQ
PCC 17.12.170	Has the county attorney concurred in the confidentiality determination?			X		PDEQ

