MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT

Preliminary Determination/Decision - Statement of Basis

for

Renewal of

FOP Number: 3101437

For:

Southern California Gas Company

Facility:

Blythe Compressor Station

Facility Address:

13100 West 14th Avenue
Blythe, CA 92225

Document Date: October 1, 2020
Submittal date to EPA/CARB for review: 10-01-20
EPA/CARB 45-day Commenting Period ends: 11-16-20
Public Notice Posted on or before: 10-07-20
Public Commenting Period ends: 11-06-20
Permit Issue date: On or about 11-17-20

Permitting Engineer:
Samuel J Oktay, PE

14306 PARK AVENUE, VICTORVILLE, CALIFORNIA 92392
PHONE: (760) 245-1661 • FAX: (760) 245-2022 • EMAIL: PERMITTING@MDAQMD.CA.GOV

A. FACILITY INFORMATION:

Owner/Company Name:	Southern California Gas Company
Facility Name:	Blythe Compressor Station (BCS)
Facility Location:	13100 West 14th Avenue, Blythe, CA 92225
Mailing Address:	P.O. Box 2300 SC9314 Chatsworth CA 91313
Federal Operating Permit Number:	3101437
MDAQMD Company Number:	31
MDAQMD Facility Number:	01437
Responsible Official:	Mr. Firas Hamze Field Operations Manager 562-477-1107
Facility "Site" Contact #1:	William Temple (442) 226-5438
Facility "Site" Contact #2	Alison Wong Senior Environmental Specialist 213-604-4534 AWong2@socalgas.com
Facility “Off Site” Contact(s):	Chanice Allen Environmental Team Lead 213-276-5047 CAllen2@socalgas.com
Nature of Business:	Natural Gas Compression and Transmission
SIC/NAICS Code:	4922/486210 – Pipeline Transportation of Natural Gas
Facility Coordinates:	UTM (Km) 718.704E / 3720.720N
Decimal Coordinates:	33.60457, -114.64131

B. BACKGROUND:

The Federal Clean Air Act Amendments of 1990 established a nation-wide permit to operate program commonly known as "Title V". The Mojave Desert Air Quality Management District (MDAQMD or District) adopted Regulation XII [Rules 1200-1210] and Rule 221 - *Federal Operating Permit Requirement*; [Version in SIP = Current, 40CFR 52.220(c)(216)(i)(A)(2) - 02/05/96 61 FR 4217], to implement both the Federal Operating Permit and Acid Rain Permit programs locally and have received Final Program Approval from EPA on March 6, 1996.

This facility (Southern California Gas Company, Blythe Compressor Station) is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and MDAQMD Regulation XII, *Federal Operating Permits*. SCG - Blythe Compressor Station is defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definition*, as this facility has a Potential to Emit (PTE) greater than the Major Facility thresholds for Carbon Monoxide, Nitrogen Oxides and Hazardous Air Pollutants (HAPs).

Pursuant to Regulation XII, *Federal Operating Permits*, the District has reviewed the terms and conditions of this Federal Operating Permit and determined that they are still valid and correct. This review included an analysis of federal, state, and local applicability determinations for all sources, including those that have been modified or permitted since the issuance of the initial Federal Operating Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. This *Statement of Legal and Factual Basis*, pursuant to Rule 1203(B)(1)(a)(i), is intended to assess the adequacy of the existing Title V Permit and explain the District's basis in composing the proposed Renewal.

In the MDAQMD, state and District requirements are also applicable requirements and are included in the Federal Operating Permit. These requirements can be federally enforceable or non-federally enforceable. State and District only applicable requirements are designated as such.

The purpose of this action is to renew the Southern California Gas Company, Blythe Compressor Station's, Federal Operating Permit, 3101437.

C. DESCRIPTION OF FACILITY:

Southern California Gas Company (SoCalGas), Blythe Compressor Station, located at 13100 West 14th Avenue, Blythe, CA 92225. SCG, Blythe Compressor Station is a natural gas compression and transmission pipeline facility located in Blythe, California.

The facility is presently undergoing a major facility modification, which consists of the following equipment and brief description of the equipment's disposition during the facilities project improvement phases. This action was previously approved on or about January of 2019 and the modified facility is still under construction.

Table 1 Equipment Summary:

Equipment Description	District Permit Number	Comments
NATURAL GAS IC ENGINES POWERING RECIPROCATING COMPRESSORS consisting of: Year of Manufacturer 1948; 2SLB; RICE NESHAP 40 CFR 63 Subpart ZZZZ IS NOT APPLICABLE Pursuant to Section 63.6590(b)(3); these existing 2SLB engines each with a rating of more than 500 brake HP and located at a major source of HAP emissions do NOT need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or operating limitations in Tables 1b and 2b of this subpart. Engines are Eight Dresser-Clark natural gas-fired engines, Model HBA8, driving natural gas compressors in two plants as specified below producing 1760 bhp with 8 cylinders at 300 rpm while consuming a maximum of 17 MMBtu/hr each. Stack is 22.5-foot-high and 1.70 foot in diameter. Stack exhausts at 12639.5 cfm at a temperature of 631 Degrees F and velocity of 5572 fpm. This Permit permits Eight Identical Clark Engines. Five of those engines will modified through the installation of oxidation catalyst systems, turbochargers, and PCC/LEC and/or HPFI/EM to produce emission reductions and Simultaneous Emissions Reduction Credits for use in Permitting New Equipment as Part of the Blythe Compressor Station Upgrade Project, implemented as Phase I and Phase II. Clark Compressor 11 will be modified first to determine which technologies and controls will ultimately be used on Clark Compressor No's 11, 12, 14, & 15, which will be Modified during Phase I; Clark No. 13 to be modified during Phase II.	B004154	Equipment will be Shut Down, and District Permit will be Cancelled during Project Phase II; Emissions reductions used for SERs

NOTE: ENGINES WITH SERIAL NUMBERS 30129, 30151, AND 30194 ARE SCHEDULED TO BE SHUT DOWN AND THIS PERMIT CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT. THIS PERMIT WILL BE MODIFIED ACCORDINGLY AND AS THE BCS PROJECT PROGRESSES.		
NATURAL GAS IC ENGINE, GENERATOR 5, PLANT 2, AUXILIARY BUILDING, Year of Manufacturer 1953. Engine is Subject to RICE NESHAP 40 CFR Part 63 Subpart ZZZZ, and is located at a HAP Major Source. Engine Exhaust is vented through an DCL America NSCR Catalyst DC73-8 CC. Engine has a maximum heat input of 5.41 MMBTU/Hr. Equipment Elevation is 263 feet above sea level. Stack is 11.6-foot-high and 0.70 foot in diameter. Stack exhausts at 855 cfm at a temperature of 675 Degrees F and velocity of 2229 fpm. THIS ENGINE AND ITS INTEGRAL NSCR CATALYST ARE SCHEDULED TO BE SHUT DOWN AND THIS PERMIT CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT.	B004158	Equipment will be Shut Down, and District Permit will be Cancelled during Project Phase II; Emissions reductions used for SERs
NATURAL GAS IC ENGINE, RECIPROCATING COMPRESSOR, PLANT 2, AUXILIARY BUILDING; Year of Manufacturer 1966. Engine is Subject to RICE NESHAP 40 CFR Part 63 Subpart ZZZZ, and is located at a HAP Major Source. To Comply With RICE NESHAP Engine is Equipped with an NSCR catalyst Manufactured By DCL; Catalyst Model DC49.	B004159	Equipment will be Shut Down, and District Permit will be Cancelled during Project Phase II; Emissions reductions used for SERs

Engine has a maximum heat input of 1.55 MMBTU/Hr. Equipment Elevation is 262 feet above sea level. Stack height is 15.9 feet and stack diameter is 0.50 feet. Stack exhausts at 391 cfm at a temperature of 525 Degrees F and velocity of 2000 fpm. THIS ENGINE AND ITS INTEGRAL NSCR CATALYST ARE SCHEDULED TO BE SHUT DOWN AND THIS PERMIT CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT.		
NATURAL GAS IC ENGINE, RECIPROCATING COMPRESSOR 1, PLANT 3; Year of Manufacturer 2002. Engine Exhaust is vented through an Oxidation Catalyst System Permitted as C008086; Rice NESHAP 40 CFR 63 Subpart ZZZZ IS NOT APPLICABLE Pursuant to Section 63.6590(b)(3); Engine is an existing 4SLB with a site rating of more than 500 brake HP located at a major source of HAP emissions. NOTE: THIS ENGINE AND ITS ASSOCIATED OXIDATION CATALYST WITH PERMIT NUMBER C008086 ARE SCHEDULED TO BE SHUTDOWN AND PERMITS CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT. Equipment Elevation is 259 feet above sea level. Stack height is 48 feet and stack diameter is 2.5 feet. Stack exhausts at 25388 cfm at a temperature of 656 Degrees F and velocity of 5172 fpm. Equipment includes one Natural Gas Electric Vapor Collection System (VCS) shared with Compressor 2 in Plant 3.	B008079	Equipment will be Shut Down, and District Permit will be Cancelled during Project Phase II; Emissions reductions used for SERs

NATURAL GAS IC ENGINE, RECIPROCATING COMPRESSOR 2, PLANT 3; Year of Manufacturer 2002. Engine Exhaust is vented through an Oxidation Catalyst System Permitted as C008087; Rice NESHAP 40 CFR 63 Subpart ZZZZ IS NOT APPLICABLE Pursuant to Section 63.6590(b)(3); Engine is an existing 4SLB with a site rating of more than 500 brake HP located at a major source of HAP emissions. NOTE: THIS ENGINE AND ITS ASSOCIATED OXIDATION CATALYST WITH PERMIT NUMBER C008087 ARE SCHEDULED TO BE SHUTDOWN AND PERMITS CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT. Equipment Elevation is 260 feet above sea level. Stack height is 48 feet and stack diameter is 2.5 feet. Stack exhausts at 25388 cfm at a temperature of 656 Degrees F and velocity of 5172 fpm. Equipment includes one Natural Gas Electric Vapor Collection System (VCS) shared with Compressor 1 in Plant 3.	B008080	Equipment will be Shut Down, and District Permit will be Cancelled during Project Phase II; Emissions reductions used for SERs
NATURAL GAS IC ENGINE, GENERATOR 1, CENTRAL SUPPORTING; Year of Manufacturer 2002. Engine is Subject to RICE NESHAP 40 CFR Part 63 Subpart ZZZZ for engines located at a HAP Major Source. Engine Exhaust is vented through an NSCR Permitted as C008089. Engine has a maximum heat input of 4 MMBTU/Hr. NOTE: THIS ENGINE AND ITS ASSOCIATED 3-WAY CATALYST, PERMITTED AS C008089, ARE SCHEDULED TO BE SHUT	B008081	Equipment will be Shut Down, and District Permit will be Cancelled during Project Phase II; Emissions reductions used for SERs

DOWN AND PERMITS CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT. Equipment Elevation is 257 feet above sea level. Stack height is 20 feet and stack diameter is 1.0 feet. Stack exhausts at 1158 cfm at a temperature of 635 Degrees F and velocity of 1474 fpm.		
NATURAL GAS IC ENGINE, GENERATOR 2, CENTRAL SUPPORTING; Year of Manufacturer 2002. Engine is Subject to RICE NESHAP 40 CFR Part 63 Subpart ZZZZ for engines located at a HAP Major Source. Engine Exhaust is vented through an NSCR Permitted as C008090. Engine has a maximum heat input of 4 MMBTU/Hr. NOTE: THIS ENGINE AND ITS ASSOCIATED 3-WAY CATALYST, PERMITTED AS C008090, ARE SCHEDULED TO BE SHUT DOWN AND PERMITS CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT. Equipment Elevation is 260 feet above sea level. Stack height is 20 feet and stack diameter is 1.0 feet. Stack exhausts at 1158 cfm at a temperature of 635 Degrees F and velocity of 1474 fpm.	B008082	Equipment will be Shut Down, and District Permit will be Cancelled during Project Phase II; Emissions reductions used for SERs
NATURAL GAS IC ENGINE, GENERATOR 3, CENTRAL SUPPORTING; Year of Manufacturer 2002. Engine is Subject to RICE NESHAP 40 CFR Part 63 Subpart ZZZZ for engines located at a HAP Major Source. Engine Exhaust is vented through an NSCR Permitted as C008091.	B008083	Equipment will be Shut Down, and District Permit will be Cancelled during Project Phase II; Emissions reductions used for SERs

Engine has a maximum heat input of 4 MMBTU/Hr. NOTE: THIS ENGINE AND ITS ASSOCIATED 3-WAY CATALYST, PERMITTED AS C008091, ARE SCHEDULED TO BE SHUT DOWN AND PERMITS CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT. Equipment Elevation is 257 feet above sea level. Stack height is 20 feet and stack diameter is 1.0 feet. Stack exhausts at 1158 cfm at a temperature of 635 Degrees F and velocity of 1474 fpm.		
NATURAL GAS IC ENGINE, GENERATOR 4, CENTRAL SUPPORTING; Year of Manufacturer 2002. Engine is Subject to RICE NESHAP 40 CFR Part 63 Subpart ZZZZ for engines located at a HAP Major Source. Engine Exhaust is vented through an NSCR Permitted as C008092. Engine has a maximum heat input of 4 MMBTU/Hr. NOTE: THIS ENGINE AND ITS ASSOCIATED 3-WAY CATALYST, PERMITTED AS C008092, ARE SCHEDULED TO BE SHUT DOWN AND PERMITS CANCELLED PERMANENTLY DURING PHASE II OF THE BCS COMPRESSOR UPGRADE PROJECT. Equipment Elevation is 257 feet above sea level. Stack height is 20 feet and stack diameter is 1.0 feet. Stack exhausts at 1158 cfm at a temperature of 635 Degrees F and velocity of 1474 fpm.	B008084	Equipment will be Shut Down, and District Permit will be Cancelled during Phase II; Emissions reductions used for SERs
TURBINE, CENTRIFUGAL NATURAL GAS COMPRESSOR 1, PLANT 4; One Siemens-Dresser, natural gas-fired turbine, Model No.	B012852	Equipment scheduled for installation during Project Phase I

SGT-300 and Serial No. TBD, producing 7954 bhp at 12000 rpm while consuming a maximum of 71.83 MMBtu/hr. This turbine is equipped with Dry Low NOx Combustors (DLN), selective catalytic NOx reduction system (SCR) with valid District permit C012862, and VOC and CO oxidation catalyst system with valid District permit C012858. This turbine powers a Siemens-Dresser Compressor Model No. TBD with a mechanical rating of less than 10 MW. Equipment Elevation is 259 feet above sea level. Stack is 60 feet high and has a diameter of 7.5 ft. Stack exhausts at 160,000 cfm at a temperature of 780 Degrees F and at a velocity of 18.4 m/s. Note: This turbine compressor will become operational during Phase II of the BCS NSR Project.		
TURBINE, CENTRIFUGAL NATURAL GAS COMPRESSOR 2, PLANT 4; One Siemens-Dresser, natural gas-fired turbine, Model No. SGT-300 and Serial No. TBD, producing 7954 bhp at 12000 rpm while consuming a maximum of 71.83 MMBtu/hr. This turbine is equipped with Dry Low NOx Combustors (DLN), selective catalytic NOx reduction system (SCR) with valid District permit C012861, and VOC and CO oxidation catalyst system with valid District permit C012857. This turbine powers a Siemens-Dresser Compressor Model No. TBD with a mechanical rating of less than 10 MW. Equipment Elevation is 259 feet above sea level. Stack is 60 feet high and has a diameter of 7.5 ft. Stack exhausts at 160,000 cfm at a temperature of 780 Degrees F and at a velocity of 18.4 m/s. Note: This turbine compressor will become operational during Phase II of the BCS NSR Project.	B012853	Equipment scheduled for installation during Project Phase I

TURBINE, CENTRIFUGAL NATURAL GAS COMPRESSOR 3, PLANT 4; One Siemens-Dresser, natural gas-fired turbine, Model No. SGT-300 and Serial No. TBD, producing 7954 bhp at 12000 rpm while consuming a maximum of 71.83 MMBtu/hr. This turbine is equipped with Dry Low NOx Combustors (DLN), selective catalytic NOx reduction system (SCR) with valid District permit C012862, and VOC and CO oxidation catalyst system with valid District permit C012858. This turbine powers a Siemens-Dresser Compressor Model No. TBD with a mechanical rating of less than 10 MW. Equipment Elevation is 259 feet above sea level. Stack is 60 feet high and has a diameter of 7.5 ft. Stack exhausts at 160,000 cfm at a temperature of 780 Degrees F and at a velocity of 18.4 m/s. Note: This turbine compressor will become operational during Phase II of the BCS NSR Project.	B012854	Equipment scheduled for installation during Project Phase II
TURBINE, CENTRIFUGAL NATURAL GAS COMPRESSOR 4, PLANT 4; One Siemens-Dresser, natural gas-fired turbine, Model No. SGT-300 and Serial No. TBD, producing 7954 bhp at 12000 rpm while consuming a maximum of 71.83 MMBtu/hr. This turbine is equipped with Dry Low NOx Combustors (DLN), selective catalytic NOx reduction system (SCR) with valid District permit C012863, and VOC and CO oxidation catalyst system with valid District permit C012859. This turbine powers a Siemens-Dresser Compressor Model No. TBD with a mechanical rating of less than 10 MW. Equipment Elevation is 259 feet above sea level. Stack is 60 feet high and has a diameter of 7.5 ft. Stack exhausts at 160,000 cfm at a temperature of	B012855	Equipment scheduled for installation during Project Phase II

780 Degrees F and at a velocity of 18.4 m/s. Note: This turbine compressor will become operational during Phase II of the BCS NSR Project.		
NATURAL GAS IC ENGINE, PRIME GENERATOR 1, PHASE I (GENERATOR BUILDING); GE Power Waukesha with emPact Emission Control System. Year of Manufacture is TBD; 4SRB, Engine Meets Stationary Spark Ignition ICE NSPS Requirements Pursuant to 40 CFR 60, Subpart JJJJ as the Manufacture Date is Subsequent to 2006; is equipped with three-way catalysts/non-selective catalytic reduction permitted under valid District Permit C012870. Equipment Elevation is 258 feet above sea level. Stack is 35 feet high, and has a diameter of 1.17 feet. Exhaust flow rate is 4,930 cfm at a temperature of 1061 Degrees F.	B012864	Equipment scheduled for installation during Project Phase I
NATURAL GAS IC ENGINE, PRIME GENERATOR 2, PHASE I (GENERATOR BUILDING); GE Power Waukesha with emPact Emission Control System. Year of Manufacture is TBD; 4SRB, Engine Meets Stationary Spark Ignition ICE NSPS Requirements Pursuant to 40 CFR 60, Subpart JJJJ as the Manufacture Date is Subsequent to 2006; is equipped with three-way catalysts/non-selective catalytic reduction permitted under valid District Permit C012871. Equipment Elevation is 259 feet above sea level. Stack is 35 feet high, and has a diameter of 1.17 feet. Exhaust flow rate is 4,930 cfm at a temperature of 1061 Degrees F. Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.	B012865	Equipment scheduled for installation during Project Phase I

NATURAL GAS IC ENGINE, PRIME GENERATOR 3, PHASE I (GENERATOR BUILDING); GE Power Waukesha with emPact Emission Control System. Year of Manufacture is TBD; 4SRB, Engine Meets Stationary Spark Ignition ICE NSPS Requirements Pursuant to 40 CFR 60, Subpart JJJJ as the Manufacture Date is Subsequent to 2006; is equipped with three-way catalysts/non-selective catalytic reduction permitted under valid District Permit C012872. Stack is 35 feet high, and has a diameter of 1.17 feet. Exhaust flow rate is 4,930 cfm at a temperature of 1061 Degrees F. Equipment Elevation is 259 feet above sea level. Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.	B012866	Equipment scheduled for installation during Project Phase I
NATURAL GAS IC ENGINE, PRIME GENERATOR 4, PHASE I (GENERATOR BUILDING); GE Power Waukesha with emPact Emission Control System. Year of Manufacture is TBD; 4SRB, Engine Meets Stationary Spark Ignition ICE NSPS Requirements Pursuant to 40 CFR 60, Subpart JJJJ as the Manufacture Date is Subsequent to 2006; is equipped with three-way catalysts/non-selective catalytic reduction permitted under valid District Permit C012873. Equipment Elevation is 260 feet above sea level. Stack is 35 feet high, and has a diameter of 1.17 feet. Exhaust flow rate is 4,930 cfm at a temperature of 1061 Degrees F.	B012867	New Equipment scheduled for installation during Project Phase I

Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.		
NATURAL GAS IC ENGINE, PRIME GENERATOR 5, PHASE I (GENERATOR BUILDING); GE Power Waukesha with emPact Emission Control System. Year of Manufacture is TBD; 4SRB, Engine Meets Stationary Spark Ignition ICE NSPS Requirements Pursuant to 40 CFR 60, Subpart JJJJ as the Manufacture Date is Subsequent to 2006; is equipped with three-way catalysts/non-selective catalytic reduction permitted under valid District Permit C012874. Equipment Elevation is 260 feet above sea level. Stack is 35 feet high, and has a diameter of 1.17 feet. Exhaust flow rate is 4,930 cfm at a temperature of 1061 Degrees F. Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.	B012868	Equipment scheduled for installation during Project Phase I
NATURAL GAS IC ENGINE, COMPRESSOR, PLANT 2, CLARK 11, PRE-PHASE I AND PHASE I; Year of Manufacturer 1948; 2SLB; RICE NESHAP 40 CFR 63 Subpart ZZZZ IS NOT APPLICABLE Pursuant to Section 63.6590(b)(3); this existing 2SLB engine has a rating of more than 500 brake HP and is located at a major source of HAP emissions does NOT need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or the operating limitations in Tables 1b and 2b of this subpart. Clark Compressor 11, will be modified first, either prior to and/or during the BCS Compressor project Phase I, to determine which technologies and controls will ultimately be used on this Clark Compressor 11, and those identified	B013092	Previously Permitted as B004154; Will be modified during Pre-Phase I and During Phase I; Emission Reductions used for SERs

as Clark 12, 14, & 15, to be modified during Phase I; Clark 13 to be modified during Phase II. Equipment Elevation is 261 feet above sea level. Stack is 30.4 feet high and 1.67 feet in Diameter. Stack exhausts at 16,272 cfm at a temperature of 458 Degrees F and at a velocity of TBD fpm. Engine drives an integral compressor on a common crankshaft. Equipment previously permitted as one of Eight Identical Clark Engines, permitted under aggregated permit B004154. Five of those engines are being modified through the installation of oxidation catalyst systems, turbochargers, and PCC/LEC and/or HPFI/EM to produce emission reductions and Simultaneous Emissions Reduction Credits for use in Permitting New Equipment as Part of the Blythe Compressor Station Upgrade Project, implemented as Phase I and Phase II. Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.		
NATURAL GAS IC ENGINE, COMPRESSOR, PLANT 2, CLARK 12, PHASE I; Year of Manufacturer 1948; 2SLB; RICE NESHAP 40 CFR 63 Subpart ZZZZ IS NOT APPLICABLE Pursuant to Section 63.6590(b)(3); this existing 2SLB engine has a rating of more than 500 brake HP and is located at a major source of HAP emissions does NOT need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or the operating limitations in Tables 1b and 2b of this subpart. Equipment Elevation is 261 feet above sea level. Stack is 30.4 feet high and 1.67 feet in Diameter. Stack exhausts at 16,272 cfm at a temperature of	B013093	Previously Permitted as B004154; Will be modified during Project Phase I; Emission Reductions used for SERs

458 Degrees F and at a velocity of TBD fpm. Engine drives an integral compressor on a common crankshaft. Equipment previously permitted as one of Eight Identical Clark Engines, permitted under aggregated permit B004154. Five of those engines are being modified through the installation of oxidation catalyst systems, turbochargers, and PCC/LEC and/or HPFI/EM to produce emission reductions and Simultaneous Emissions Reduction Credits for use in Permitting New Equipment as Part of the Blythe Compressor Station Upgrade Project, implemented as Phase I and Phase II. Clark Compressor 11, will be modified first, either prior to and/or during the BCS Compressor project Phase I, to determine which technologies and controls will ultimately be used on Compressor No 11, and those identified as Clark 12, 14, & 15, to be modified during Phase I; Clark 13 to be modified during Phase II. Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.		
NATURAL GAS IC ENGINE, COMPRESSOR, PLANT 2, CLARK 13, PHASE II; Year of Manufacturer 1948; 2SLB; RICE NESHAP 40 CFR 63 Subpart ZZZZ IS NOT APPLICABLE Pursuant to Section 63.6590(b)(3); this existing 2SLB engine has a rating of more than 500 brake HP and is located at a major source of HAP emissions does NOT need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or the operating limitations in Tables 1b and 2b of this subpart. Equipment Elevation is 261 feet above sea level. Stack is 30.4 feet high and 1.67 feet in Diameter. Stack exhausts at 16,272 cfm at a temperature of	B013094	Previously Permitted as B004154; Will be modified during Project Phase II; Emission Reductions used for SERs

458 Degrees F and at a velocity of TBD fpm. Engine drives an integral compressor on a common crankshaft. Equipment previously permitted as one of Eight Identical Clark Engines, permitted under aggregated permit B004154. Five of those engines are being modified through the installation of oxidation catalyst systems, turbochargers, and PCC/LEC and/or HPFI/EM to produce emission reductions and Simultaneous Emissions Reduction Credits for use in Permitting New Equipment as Part of the Blythe Compressor Station Upgrade Project, implemented as Phase I and Phase II. Clark Compressor 11, will be modified first, either prior to and/or during the BCS Compressor project Phase I, to determine which technologies and controls will ultimately be used on Compressor No 11, and those identified as Clark 12, 14, & 15, to be modified during Phase I; Clark 13 to be modified during Phase II. Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.		
NATURAL GAS IC ENGINE, COMPRESSOR, PLANT 2, CLARK 14, PHASE I; Year of Manufacturer 1948; 2SLB; RICE NESHAP 40 CFR 63 Subpart ZZZZ IS NOT APPLICABLE Pursuant to Section 63.6590(b)(3); this existing 2SLB engine has a rating of more than 500 brake HP and is located at a major source of HAP emissions does NOT need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or the operating limitations in Tables 1b and 2b of this subpart. Equipment Elevation is 261 feet above sea level. Stack is 30.4 feet high and 1.67 feet in Diameter. Stack exhausts at 16,272 cfm at a temperature of	B013095	Previously Permitted as B004154; Will be modified during Project Phase I; Emissions reductions used for SERs

458 Degrees F and at a velocity of TBD fpm. Engine drives an integral compressor on a common crankshaft. Equipment previously permitted as one of Eight Identical Clark Engines, permitted under aggregated permit B004154. Five of those engines are being modified through the installation of oxidation catalyst systems, turbochargers, and PCC/LEC and/or HPFI/EM to produce emission reductions and Simultaneous Emissions Reduction Credits for use in Permitting New Equipment as Part of the Blythe Compressor Station Upgrade Project, implemented as Phase I and Phase II. Clark Compressor 11, will be modified first, either prior to and/or during the BCS Compressor project Phase I, to determine which technologies and controls will ultimately be used on Compressor No 11, and those identified as Clark 12, 14, & 15, to be modified during Phase I; Clark 13 to be modified during Phase II. Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.		
NATURAL GAS IC ENGINE, COMPRESSOR, PLANT 2, CLARK 15, PHASE I; Year of Manufacturer 1948; 2SLB; RICE NESHAP 40 CFR 63 Subpart ZZZZ IS NOT APPLICABLE Pursuant to Section 63.6590(b)(3); this existing 2SLB engine has a rating of more than 500 brake HP and is located at a major source of HAP emissions does NOT need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or the operating limitations in Tables 1b and 2b of this subpart. Equipment Elevation is 261 feet above sea level. Stack is 30.4 feet high and 1.67 feet in Diameter. Stack exhausts at 16,272 cfm at a temperature of	B013096	Previously Permitted as B004154; Will be modified during Project Phase I; Emission Reductions used for SERs

458 Degrees F and at a velocity of TBD fpm. Engine drives an integral compressor on a common crankshaft. Equipment previously permitted as one of Eight Identical Clark Engines, permitted under aggregated permit B004154. Five of those engines are being modified through the installation of oxidation catalyst systems, turbochargers, and PCC/LEC and/or HPFI/EM to produce emission reductions and Simultaneous Emissions Reduction Credits for use in Permitting New Equipment as Part of the Blythe Compressor Station Upgrade Project, implemented as Phase I and Phase II. Clark Compressor 11, will be modified first, either prior to and/or during the BCS Compressor project Phase I, to determine which technologies and controls will ultimately be used on Compressor No 11, and those identified as Clark 12, 14, & 15, to be modified during Phase I; Clark 13 to be modified during Phase II. Note: The facility is currently a HAP Major Source. Once the facility has undergone both Phase I and Phase II Modifications, the facility will become a HAP area source.		
NATURAL GAS-POWERED PNEUMATIC DEVICES; Pneumatic Device means an automation device that uses natural gas, compressed air, or electricity to control a process. Continuous Low Bleed Pneumatic Devices means the continuous venting of natural gas from a gas-powered pneumatic device to the atmosphere. Continuous bleed pneumatic devices must vent continuously in order to operate. Intermittent Bleed Pneumatic Devices means the intermittent venting of natural gas from a gas-powered pneumatic device to the atmosphere. Intermittent bleed pneumatic devices may vent all	B013430	To be installed during Project Phase I and Phase II.

or a portion of their supply gas when control action is necessary but do not vent continuously.		
DIESEL IC ENGINE, EMERGENCY DIRECT-DRIVE WATER PUMP, PHASE I; Year of Manufacture is 2018. Engine is a certified Tier III diesel engine, EPA Family Name JJDXL06.8120; EPA Certificate Number JJDXL06.8120-006; Engine Model Year 2018; DOES NOT HAVE A CORRESPONDING CARB EO CERTIFICATE. Engine meets the emissions requirements of 17 CCR 93115, and NSPS Subpart IIII. Equipment elevation is 262 feet above sea level. Stack height is 12 feet and Stack Diameter is 5 inches. Stack exhaust at 1189 cfm at 986 Degrees F and at a velocity of TBD fpm.	E013097	Equipment scheduled for installation during Project Phase I
GASOLINE DISPENSING FACILITY (NON-RETAIL), LOCATED ADJACENT TO THE PARKING GARAGE; Equipment Elevation is 261 feet above sea level.	N004119	Existing equipment; no changes planned during upgrade modification project.
STORAGE TANK, TRANSFER OIL, SW CORNER OF PLANT 1; Aboveground 1200-gallon transfer oil storage tanks, 4 ft H x 8 ft L x 5 ft W. Equipment elevation is 261 feet above sea level.	T004134	Existing equipment; no changes planned during upgrade modification project.
STORAGE TANK, WASTE OIL, PLANT 1; Aboveground pipeline waste oil drip tank, 1180-gallon capacity, 2 ft 10 in H x 13 ft 6 in L x 4 ft W. Equipment elevation is 259 feet above sea level.	T004135	Existing equipment; no changes planned during upgrade modification project.

STORAGE TANK, WASTE OIL; 5300-gallon capacity waste oil storage tank, 7 ft diameter by 25 ft high, located in the Oil Storage Area. Equipment elevation is 259 feet above sea level.	T004136	Existing equipment; no changes planned during upgrade modification project.
STORAGE TANK, WASTE OIL, PLANT 2; Aboveground pipeline waste oil drip tank 2-L, 1180-gallon capacity, 2 ft 10 in H x 13 ft 6 in L x 4 ft W. Equipment elevation is 259 feet above sea level.	T004138	Existing equipment; no changes planned during upgrade modification project.
STORAGE TANK, TRANSFER OIL; Aboveground 1200-gallon transfer oil storage tank, 4 ft H x 8 ft L x 5 ft W, located at the SE corner of Plant 2. Equipment elevation is 260 feet above sea level.	T004422	Existing equipment; no changes planned during upgrade modification project.
NATURAL GAS ODORANT STORAGE & INJECTION SYSTEM: A 10,000-gallon odorant tank and related equipment. This system is electrically operated but odorant injection is achieved with a pipeline-pressure driven pump. This permit includes the injection system (odorant control system, odorant metering system, odorant filtering equipment, and related appurtenances). Stack is 18.0 feet in height and 0.5 feet in diameter. Stack gas temperature is 75 deg F, stack gas flow is 98 cfm, at 500 fpm. Equipment elevation is 260 feet above sea level.	T010103	Existing equipment; no changes planned during upgrade modification project.
AQUEOUS AMMONIA STORAGE TANK, PHASE I; 10,000 gallons steel pressurized storage tank.	T013121	Equipment scheduled for installation during Project Phase I.

The tank will have an inner diameter of 8 feet and be 28 feet long and store Aqueous Ammonia in concentrations of less than 20%. The Aqueous Ammonia stored in this tank is used as part of the SCR Emissions Control System. Equipment Elevation is 260 feet above sea level.		

APPENDIX D of this Statement of Basis, contains:
Continuous Parameter Monitoring System (CPMS) Plan as submitted by Southern California Gas Company Blythe Compressor Station for Compressors 1 and 2 at Plant 3.

APPENDIX E of this Statement of Basis, contains:
Continuous Parameter Monitoring System (CPMS) Plan as submitted by Southern California Gas Company Blythe Compressor Station for Generators 1-4, Generator 5, and Air Compressors.

D. MODIFICATIONS TO CURRENT FEDERAL OPERATING PERMIT:

GENERAL UPDATES
● General formatting updates to improve the consistency of the Title V permits program.
● Update rule citations throughout the permit. Each rule citation was reformatted for program consistency which includes relocating the SIP citations to Part VII. The table sufficiently identifies each rule, the SIP status of the rule and the federal enforceability of each rule.

PART I: INTRODUCTORY INFORMATION
This section of the Federal Operating Permit contains general information about Southern California Gas Company (SCG)**,** Blythe Compressor Station facility, including facility identifying information (section A), a description of the facility (section B), and a description of the facility's equipment (section C).

Changes made to this section of the FOP, include:
● Change in Responsible Official from Mr. Carlos Gaeta to Mr. Firas Hamze

● Minor changes made to equipment description and conditions for the following District Permits:

B004154, B004158, B004159, B008079, B008080, B008081, B008082, B008083, B008084, B012852, B012853, B012854, B012855, B012864, B012865, B012866, B012867, B012868, B013092, B013093, B013092, B013093, B013094, B013095, C008086, C008087, C008089, C008090, C008091, C008092, C012856, C012857, C012858, C012859, C012860, C012861, C012862, C012863, C012870, C012871, C012872, C012873, C012874, C013221, C013222,

C013223, C013224, C013225, E013097, N004119, T004134, T004135, T004136, T004138, T004422, T010102, and T013121.

● STATE ONLY, New District Permit B013430; regarding Natural Gas Pneumatic Devices; permit added pursuant to California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 Climate Change, Article 4, Subarticle 13: Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities.

PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (Section A), facility-wide monitoring, recordkeeping, and reporting requirements (Section B), and facility-wide compliance conditions (Section C).

Changes made to this section of the FOP:

- Part II, Section A. Updated to include rule revisions which occurred since the time of the last renewal.
- Part II, Section A, revised to incorporate changes made to District Rule 442, Usage of Solvents.
- Part II, Section A, revised to incorporate changes made to District Rule 1104, Organic Solvent Degreasing Operations.
- Part II, Section A, revised to incorporate formatting changes referencing District Rule 1113, Architectural Coatings.
- Part II, Section A, revised to incorporate changes made to District Rule 1114, Wood Products Coating Operations.
- Part II, Section A, revised to incorporate changes made to District Rule 1115, Metal Parts & Products Coating Operations.

Changes made to Part II, Section B: None

Changes made to Part II, Section C: None

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring and recordkeeping, reporting and testing, and compliance plans.

Changes made to Part III, Section A thru Section O:

District Permit	Description of change made
B004154	Permit has been revised to update permit conditions and to incorporate stack information; condition 26 has been updated to reflect that CARB GHG reports must be submitted through their Cal e-GGRT Reporting Portal.
B004158	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B004159	Updated equipment description from RECIPROCATING COMPRESSOR to RECIPROCATING AIR COMPRESSOR to distinguish between Air Compressor and Natural Gas Compressor.
B008079	Permit conditions were updated for consistency with similar equipment.
B008080	Permit has been revised to update permit conditions and to incorporate stack information; condition 23 has been updated to reflect that CARB GHG reports must be submitted through their Cal e-GGRT Reporting Portal.
B008081	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B008082	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B008083	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B008084	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B012852	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B012853	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.

B012854	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B012855	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B012864	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B012865	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B012866	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B012867	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B012868	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
B013092	Permit has been revised to update permit conditions for consistency with similar equipment.
B013093	Permit has been revised to update permit conditions for consistency with similar equipment.
B013094	Permit has been revised to update permit conditions for consistency with similar equipment.
B013095	Permit has been revised to update permit conditions for consistency with similar equipment.
B013096	Permit has been revised to update permit conditions for consistency with similar equipment.

B013430	Permit has been revised to update permit conditions for consistency with similar equipment.
C008086	Permit has been revised to update permit conditions for consistency with similar equipment.
C008087	Permit has been revised to update permit conditions for consistency with similar equipment.
C008089	Permit has been revised to update permit conditions for consistency with similar equipment.
C008090	Permit has been revised to update permit conditions for consistency with similar equipment.
C008091	Permit has been revised to update permit conditions for consistency with similar equipment.
C008092	Permit has been revised to update permit conditions for consistency with similar equipment.
C012856	Permit has been revised to update permit conditions for consistency with similar equipment.
C012857	Permit has been revised to update permit conditions for consistency with similar equipment.
C012858	Permit has been revised to update permit conditions for consistency with similar equipment.
C012859	Permit has been revised to update permit conditions for consistency with similar equipment.
C012860	Permit has been revised to update permit conditions for consistency with similar equipment.
C012861	Permit has been revised to update permit conditions for consistency with similar equipment.
C012862	Permit has been revised to update permit conditions for consistency with similar equipment.
C012863	Permit has been revised to update permit conditions for consistency with similar equipment.

C012870	Permit has been revised to update permit conditions for consistency with similar equipment.
C012871	Permit has been revised to update permit conditions for consistency with similar equipment.
C012872	Permit has been revised to update permit conditions for consistency with similar equipment.
C012873	Permit has been revised to update permit conditions for consistency with similar equipment.
C012874	Permit has been revised to update permit conditions for consistency with similar equipment.
C013221	Permit has been revised to update permit conditions for consistency with similar equipment.
C013222	Permit has been revised to update permit conditions for consistency with similar equipment.
C013223	Permit has been revised to update permit conditions for consistency with similar equipment.
C013224	Permit has been revised to update permit conditions for consistency with similar equipment.
C013225	Permit has been revised to update permit conditions for consistency with similar equipment.
E013097	Permit has been revised to update permit conditions for consistency with similar equipment.
N004119	Permit has been revised to update permit conditions for consistency with similar equipment.
T004134	Permit has been revised to update permit conditions for consistency with similar equipment.
T004135	Permit has been revised to update permit conditions for consistency with similar equipment.
T004136	Permit has been revised to update permit conditions for consistency with similar equipment.

T004138	Permit has been revised to update permit conditions for consistency with similar equipment.
T004422	Permit has been revised to update permit conditions for consistency with similar equipment.
T010103	Permit has been revised to update permit conditions for consistency with similar equipment and to incorporate stack information into equipment description.
T013121	Permit has been revised to update permit conditions for consistency with similar equipment.

PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS

This section of the Federal Operating Permit contains standard federal operating permit conditions.

Changes made to this section of the FOP: None

PART V: OPERATIONAL FLEXIBILITY

Changes made to this section of the FOP:
Section B, Off Permit Changes has been updated for consistency with similar Title V Permits.

PART VI: CONVENTIONS, ABBREVIATIONS, DEFINITIONS, MDAQMD APPLICABLE SIP

This section of the Federal Operating Permit contains information on conventions, abbreviations and definitions.

Changes made to this section of the FOP; moved some abbreviations so that they are in alphabetic order.

PART VII: DISTRICT SIP HISTORY AND CITATIONS

This section of the Federal Operating Permit contains a SIP table of all applicable District Rules and Historical Summary.

Changes have been made to this section of the FOP:

- SIP table updated to include rule revisions, which have occurred since the time of the last renewal.

E. RULE APPLICABILITY:

District Rules

Rule 201/203 – *Permits to Construct/Permit to Operate*. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. SCG-Blythe Compressor Station is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintain District permits for all residing equipment per Part II, section A of their FOP.

Rule 204 – *Permit Conditions*. To assure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. SCG-Blythe Compressor Station complies with all applicable regulations per Part II of their FOP.

Rule 206 – *Posting of Permit to Operate*. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. SCG-Blythe Compressor Station complies with this regulation per Part II of their FOP.

Rule 207 – *Altering or Falsifying of Permit.* A person shall not willfully deface, alter, forge, or falsify any issued permit. SCG-Blythe Compressor Station complies with this regulation per Part II of their FOP.

Rule 209 – *Transfer and Voiding of Permits*. SCG-Blythe Compressor Station shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. SCG-Blythe Compressor Station complies with this regulation per Part II their FOP.

Rule 217 – *Provisions for Sampling and Testing Facilitie*s. This rule stipulates that the APCO may require the applicant to provide and maintain requirements for sampling and testing. In the event that facilities, be equipped to accommodate testing the APCO shall notify the Owner/Operator in writing of the required size, number and location of sampling ports; the size and location of the sampling platform: the access to the sampling platform, and the utilities for operating the sampling and testing equipment. SCG-Blythe Compressor Station is in compliance with this rule per Part II of their FOP.

Rule 219 – *Equipment not Requiring a Permit*. This rule exempts certain equipment from District Permit. SCG-Blythe Compressor Station is in compliance with this rule per Part II.

Rule 221 – *Federal Operating Permit Requirement.* SCG-Blythe Compressor Station is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301/312 – *Permit Fees/Fees for Federal Operating Permits*. SCG-Blythe Compressor Station annual permit fees are due by the applicable amounts.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity. SCG-Blythe Compressor Station is in compliance with this rule per Part II.

Rule 403 – *Fugitive Dust*. This rule prohibits fugitive dust beyond the property line of any emission source. SCG-Blythe Compressor Station is in compliance with this rule per Part II.

Rule 404 – *Particulate Matter Concentration*. SCG-Blythe Compressor Station shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a).
(a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.
(b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.
(c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.
SCG-Blythe Compressor Station is in compliance with this rule per Part II.

Rule 405 – *Solid Particulate Matter, Weight*. SCG-Blythe Compressor Station shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a):

(a) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.
(b) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

SCG-Blythe Compressor Station is in compliance with this rule per Part II.

Rule 406 – *Specific Contaminants*. This rule limits single source of emissions of sulfur compounds. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 407 – Liquid and Gaseous Air Contaminants. This rule limits CO emissions from facilities. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed renewal as described is not expected to violate Rule 408. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 409 – *Combustion Contaminants*. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO_2) at standard conditions averaged over a minimum of 25 consecutive minutes. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 430 – *Breakdown Provisions*. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 442 – *Usage of Solvents*. This rule reduces VOC emissions from VOC containing materials or equipment that is not subject to any other rule in Regulation XI. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 60. Currently there are no NSPSs applicable to SCG-Blythe Compressor Station.

Rule 1104 – *Organic Solvent Degreasing Operations*. This recently revised rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1113 – *Architectural Coatings.* This rule limits the quantity of VOC in Architectural Coatings. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1114– *Wood Products Coatings.* This recently revised rule limits the quantity of VOC in Wood Coatings. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1115 – *Metal Parts and Products Coatings.* This recently revised rule limits the emission of VOC from coatings associated with Metal Parts and Products. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1159 – *Stationary Gas Turbines.* The purpose of this rule is to limit the emission of oxides of nitrogen from commercial, industrial and institutional Stationary Gas Turbines and applies to any new or existing non-utility, commercial, industrial or institutional Stationary Gas Turbine of 0.3 megawatt (MW) and larger unless the equipment is exempt from this rule pursuant to Section (D) of this rule. SCG-Blythe Compressor Station meets the requirements of this rule by complying with operating conditions listed in Part III, of their FOP.

Rule 1160 – *Internal Combustion Engines.* This recently revised District Rule is NOT applicable to the SCG-Blythe Compressor Station as this facility is located in a Federal Ozone Attainment Area (FONA).

Regulation X – *Emission Standards for Additional Specific Air Contaminants*. Pursuant to Regulation X, SCG-Blythe Compressor Station is required to comply with all applicable ATCMs, MACTs and NESHAPS.

ATCM 17 CCR 93115 applies to the Emergency Diesel Engine operating under District Permit E013097; SCG-Blythe Compressor Station is in compliance with this ATCM.

The specific MACTs/NESHAPS applicable to SCG-Blythe Compressor Station are listed under the Federal Requirements below.

Regulation XII – *Federal Operating Permits.* This regulation contains requirements for sources which must have a FOP. SCG-Blythe Compressor Station currently has a FOP and is expected to comply with all applicable rules and regulations.

Rule 1201 – *Federal Operating Permit Definitions.* SCG-Blythe Compressor Station is defined as a federal Major Facility pursuant to this rule.

Rule 1203 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. SCG-Blythe Compressor Station meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1205 – *Modifications of Federal Operating Permits*. This action to renew SCG-Blythe Compressor Station's FOP does not constitute a modification; therefore, this rule is not subject to this action.

Rule 1206 – *Reopening, Reissuance and Termination of Federal Operating Permits*. This action to SCG-Blythe Compressor Station's FOP does not constitute a Reopening, Reissuance or Termination of Federal Operating Permits; therefore, this rule is not subject to this action.

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. SCG-Blythe Compressor Station's has and/or will properly notice(d) their renewal pursuant to this rule.

Rule 1208 – *Certification*. SCG-Blythe Compressor Station's included a Certification of Responsible Official as required with the submitted application for the Renewal.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. SCG-Blythe Compressor Station's is a Major GHG Facility pursuant to Rule 1211 and has is in compliance with the requirements pertaining to this regulation.

Regulation XIII – *New Source Review*. This regulation sets forth requirements for the preconstruction review of all new or modified facilities. SCG-Blythe Compressor Station's is not a new facility nor is it currently a modified facility; therefore, this regulation does not apply.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. This rule controls the emission of toxic air contaminants from existing source. This permit action does not trigger the applicability of Rule 1520.

Regulation XVII – *Prevention of Significant Deterioration*
Please take notice that this regulation is not currently used within the MDAQMD because the USEPA has not delegated authority for the PSD Program to the MDAQMD at this time. That said, this action to renew the SCG-Blythe Compressor Station's Title V FOP, does not trigger a PSD analysis as there are no emission changes associated with this activity.

Federal Regulations

40 CFR 63, Subpart ZZZZ–National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines. SCG-Blythe Compressor Station's complies with this regulation per Part II of their FOP.

40 CFR 64, *Compliance Assurance Monitoring*. The Compliance Assurance Monitoring (CAM) rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a Major Facility that is required to obtain Title V, Part 70 or 71 permit and it meets all of the following criteria. "PSEU" means an emissions unit considered separately with respect to each regulated air pollutant.
The PSEU must:
a. Be subject to an emission limitation or standard [40 CFR 64; AND,
b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
c. Have the potential pre-control emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

Presented in Appendix A is an CAM Analysis as provided by the owner/operator; in summary CAM does NOT apply to any of the equipment at the SCG Blythe Compressor Station. We have reviewed the analysis and agree with this conclusion.

F. CONCLUSIONS AND RECOMMENDATION:

The District has reviewed the application for the renewal of the Federal Operating Permit. The District has determined that the renewal permit is in compliance with all applicable District, state, and federal rules and regulations as proposed when operated in the terms of the permit conditions given herein. The proposed permit and corresponding statement of legal and factual basis has been, or will be, publicly noticed pursuant to District Rule 1207. To view the public notice please refer to Appendix C of this document.

G. PUBLIC COMMENT AND NOTIFICATIONS:

1. Public Comment
This preliminary determination will be publicly noticed on or before 10-07-20.
The 30-Day Public Commenting Period that will end at COB on 11-06-20.

Noticing Methods include the following, per District Rule 1207 (A)(1)(a) and District Rule 1302(D)(2) and (3):

- Published in newspapers of general circulation - Riverside Press Enterprise (Riverside County) and the Daily Press (San Bernardino County) on or before 10-07-20.
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in this Appendix) on or before 10-01-20.
- Posted on the MDAQMD Website at the following link: http://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry

2. Notifications

The preliminary determination was submitted via e-mail to EPA and CARB pursuant to District Rule 1207 for a forty-five (45) day review period on or before 10-01-20. The final modified FOP shall be issued on or about 11-17-20.

All correspondence as required by District Rules 1302 and 1207 were forwarded electronically to the following recipients:

Director, Office of Air Division
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Via EPA's Portal: https://cdx.epa.gov/

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
Via e-mail at: Permits@arb.ca.gov

Field Operations Manager C/O Alison Wong via e-mail
Southern California Gas Company
P.O. Box 2300 SC9314, Chatsworth CA 91313

APPENDIX A Application Cover

Alison Wong
Technical Advisor-Environmental
Southern California Gas Co.
Tel: (213) 604-4534

SoCalGas
A Sempra Energy utility

Co/Fac: 31/1437
Section/Category: Title V
Type: TS APP
Date: 4/10/19

Southern California
Gas Company
PO Box 2300 SC9314
Chatsworth, CA
91313 - 2300

April 10, 2019
Mr. Sam Oktay
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392

Subject: Title V Renewal Package for Blythe Compressor Station; Permit Number 3101437

Dear Mr. Oktay,

Title V Permit No. 3101437 was issued to the Southern California Gas Company's Blythe Compressor Station facility with an expiration date of October 29, 2019. Mojave Desert Air Quality Management District (MDAQMD) Rule 1202 requires Title V permit holder to apply for renewal of the Title V permit no more than 18 months prior to expiration and no less than 6 months prior to the expiration date of the permit. The enclosed Title V renewal package has been prepared and submitted timely for the Blythe Compressor Station facility to comply with Rule 1202.

This renewal application package includes the following -

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- Title V permit renewal application forms are included in Appendix A.
- Appendix B includes review of MDAQMD rules that changed since the last renewal. Updated MDAQMD Rules include 442, 461, 1104,1114, and 1115.
- A draft marked-up permit with requested administrative revisions to equipment descriptions and permit conditions is included in Appendix C. In addition to the rule updates mentioned in Appendix B, the following revisions are requested.
    - Updated equipment description to match local permits.
    - Page I-4. Request to update contact information.
    - Page I-7. Request to add shared electric vapor collection system to equipment description of Compressors 1 and 2 in Plant 3.
    - Page II-39. Request to add new condition 32 regarding out-of-service equipment.
    - Page III-49. Section A. Request to add shared electric vapor collection system to equipment description of Compressors 1 and 2 in Plant 3.
    - Page III-51. Condition III.C.5. Request to add language related to missing records of fuel usage citing procedures per 40 CFR Part 98.

- Page III-55. Condition III.D.5. Request to add language related to missing records of fuel usage citing procedures per 40 CFR Part 98.

- The Continuous Parameter Monitoring System Plan for Compressors 1 and 2 at Plant 3 is provided in Appendix D.

- The Continuous Parameter Monitoring System Plan for Generators 1-4, Generator 5, and the Air Compressors is provided in Appendix E.

SoCal Gas is submitting a complete Title V Renewal application per Rule 1202 Section D as discussed below.

(a) Identifying information as required on the official application form designated by the APCO.

Completed application forms designated by the APCO are included in Appendix A.

(b) A description of the Facility's processes and/or products by Standard Industrial Classification Code. A separate description is required for each alternate operating scenario proposed by the applicant.

All processes and equipment at the facility are under SIC Code 4922. A description of facility processes and equipment with requested administrative revisions is included in Appendix C. No alternate operating scenarios are being proposed in this renewal application.

(c) Information sufficient to evaluate the emissions of the Facility, including but not limited to:

(i) The amount and type of emissions which render the Facility a Major Facility as defined in District Rule 1201 and the amount and type of emissions for any other Regulated Air Pollutant.

Appendix A includes the potential emissions for each equipment located at the facility.

(ii) The amount and type of emissions, in tons per year and in such terms as are necessary to establish compliance with an applicable standard reference test method of any Regulated Air Pollutant.

Appendix A includes the potential emissions for each equipment located at the facility.

(iii) Identification and description of all Permit Units and other points of emission within the Facility.

A description of facility processes and equipment with requested administrative revisions is included in Appendix C.

(iv) Identification and description of all air pollution control equipment and monitoring devices within the Facility.

A description of all air pollution control equipment and monitoring devices and requested administrative revisions is included in Appendix C.

(v) Information regarding fuels, fuel use, raw materials, process weight, production rates and operating schedules to the extent such information is used to determine or regulate emissions.

Potential Emissions of criteria pollutants, greenhouse gases, and hazardous air pollutants from each equipment at the facility are included in Appendix A. The potential emissions were calculated based on maximum fuel usage allowed by the permit.

(vi) Any limitations on Facility operations, or common practices within the facility which affect the emissions of Air Pollutants.

Permit limits and requested administrative revisions are included in Appendix C.

(vii) Any other information specifically required by an Applicable Requirement.

No other information is required.

(viii) Any calculations upon which the above information is based.

Appendix A includes the potential emissions for each equipment located at the facility.

(ix) Fugitive emissions shall be included in the application in the same manner as any other emissions.

There are fugitive emission sources located at this facility including, but not limited to, degreasing, surface coating, and emergency shutdowns.

(d) Information regarding Applicable Requirements including but not limited to:

(i) Citation and description of all Applicable Requirements including a description or reference to test methods used to determine compliance.

Applicable requirements and requested administrative revisions are included in Appendix B.

(ii) Any other specific information necessary to implement and enforce other Applicable Requirements or to determine if a requirement is an Applicable Requirement.

No other information is required.

(iii) An explanation of any proposed exemptions from Applicable Requirements.

Rule 1160 does not apply to the facility since the facility is not located within the federal ozone non-attainment area.

APPENDIX B Application Forms

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – GENERAL FACILITY INFORMATION

1. FACILITY ID: 1437 FACILITY SIC CODE: 4922-Natural Gas Pipeline
TITLE V PERMIT NUMBER: 3101437 PERMIT EXPIRATION DATE: 10/29/2019

2. COMPANY NAME: Southern California Gas Company

3. COMPANY MAILING ADDRESS:
STREET/P.O. BOX: P.O. Box 2300 SC9314
CITY: Chatsworth STATE: CA 9-DIGIT ZIP CODE: 91313

4. FACILITY NAME: Blythe Compressor Station

5. FACILITY MAILING ADDRESS:
STREET/P.O. BOX: 13-100 West 14th Avenue
CITY: Blythe STATE: CA 9-DIGIT ZIP CODE: 92225

6. RESPONSIBLE OFFICIAL (AS DEFINED IN 40 CFR 70.2 AND MDAQMD RULE 1201)
NAME: Mr. Firas Hamze TITLE: Field Operations Manager PHONE NUMBER 562-477-1107

7. TITLE V PERMIT CONTACT PERSON
NAME: Aaron Gushwa TITLE: Station Maintenance Supervisor PHONE NUMBER 818-333-6246

8. TYPE OF ORGANIZATION:
☐ CORPORATION ☐ SOLE OWNERSHIP ☐ GOVERNMENT ☐ PARTNERSHIP ☑ UTILITY

9. CAM (COMPLIANCE ASSURANCE MONITORING) PLANS

Are you required to submit a CAM plan for any emissions unit at this facility? ☐ Yes ☑ No
If yes, submit a CAM plan for each emissions unit as an attachment to the application. See attached CAM plan instructions for more detail.

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012 Title V Renewal – 1202E2-A

10. ALTERNATE OPERATING SCENARIOS

Does this application request alternative operating scenarios pursuant to Rule 1203(E)? ☐ Yes ☑ No
If yes, submit an Alternate Operating Scenarios form, as applicable.

11. RISK MANAGEMENT PLAN

Has this facility been required to prepare a federal Risk Management Plan pursuant to Section 112(r) of the federal Clean Air Act and 40 CFR Part 68? ☑ Yes ☐ No

If yes, has the federal Risk Management Plan been submitted to the implementing agency? ☐ Yes ☑ No

If a federal Risk Management Plan is required but has not been submitted to the implementing agency, provide a detailed explanation as an attachment to the application. RMP will be submitted to CUPA prior to operation of new equipment with ammonia.

12. STRATOSPHERIC OZONE

Does the facility conduct any activities that are regulated by the federal protection of stratospheric ozone requirements in 40 CFR Part 82? ☐ Yes ☑ No

13. ACID RAIN

Is this facility subject to the acid rain requirement in 40 CFR Part 72 through 40 CFR Part 78? ☐ Yes ☑ No

14. MAJOR SOURCE STATUS

Is this facility a major source of greenhouse gases, as defined in MDAQMD Rule 1211? ☑ Yes ☐ No

Is this facility a major source of any of the following pollutants:

☐ VOCs ☐ Particulate Matter ☑ Carbon Monoxide ☑ Nitrogen Oxides ☐ Sulfur Dioxides
☐ Lead ☑ HAP

15. PERMIT SHIELDS

Does the current Title V permit for this facility include any permit shields? ☐ Yes ☑ No

If yes, is the basis for each permit shield still correct? ☐ Yes ☐ No

If the current Title V permit contains any permit shield for which the basis is no longer correct, provide a detailed explanation as an attachment to the application. If you are requesting an additional permit shield, complete the attached Permit Shield Request form.

16. CERTIFICATION BY RESPONSIBLE OFFICIAL

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete. I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Signature: _____ (Firas Hamze) Date: 4/12/2019

11. Risk Management Plan

Pursuant to Section 112 of the federal Clean Air Act and 40 CFR Part 68, the SoCalGas Blythe Compressor Station will be required to prepare a federal Risk Management Plan (RMP.) The project scope planning for the aqueous ammonia tank is still in progress with an estimated installation for 4th quarter 2019 or 1st quarter 2020. Consequently, the risk determinations for the aqueous ammonia tank are not complete and consultation along with communication with the implementing agency has not taken place. Once the information for all elements of the RMP have been obtained, a submittal date will be identified and coordinated with the implementing agency.

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – APPLICATION CERTIFICATION

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 1437
3. TITLE V PERMIT #: 3101437

II. TITLE V PERMIT CERTIFICATION (Read each statement carefully and check one):

☐ The current Title V permit has been reviewed and it has been determined that equipment descriptions are correct, and all requirements are still applicable.

☒ The current Title V permit has been reviewed and errors have been found in equipment descriptions and/or permit requirements. A copy of the Title V permit is attached with redline changes. Permit application and/or modification forms are enclosed, as applicable.

III. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s), except for those requirements listed in the "Title V Non-Compliant Operations Report".

☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis, except for those requirements listed in the "Title V Non-Compliant Operations Report".

☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete. I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true.

Signature of Responsible Official

4/12/2019
Date

Firas Hamze
Name of Responsible Official (please print)

Field Operations Manager
Title of Responsible Official (please print)

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-B

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – LIST OF EXEMPT EQUIPMENT

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #:3101437

II. SUMMARY OF EQUIPMENT EXEMPT FROM PERMIT REQUIREMENTS (INCLUDING PORTABLE)

4. EXEMPT EQUIPMENT DESCRIPTION	5. VENTING TO CONTROL (PERMIT #)	6. CONTROL DEVICE DESCRIPTION	7. BASIS FOR EXEMPTION (e.g. Rule 219(D)(2)(b))
Oil Tanks	---	---	R. 219 (E)(14)(h)
Diesel tank	---	---	R. 219 (E)(14)(c)(iii)
Evaporative Cooler	---	---	R. 219 (E)(4)(c)
Welding Equipment	---	---	R. 219 (E)(5)(e)
Torch Cutter	---	---	R. 219 (E)(5)(e)
Plasma Arc Cutter (non-stainless steel)	---	---	R. 219 (E)(5)(e)
Metal Press/Forge	---	---	R. 219 (E)(5)(e)
Parts Washer	---	---	R. 219 (E)(13)(j)

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL EMISSIONS REPORT, CRITERIA POLLUTANTS & HAPs

I. FACILITY INFORMATION

1. FACILITY NAME:	Blythe Compressor Station
2. FACILITY ID:	1437
3. TITLE V PERMIT #:	3101437

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS (Each Unit)							
		NOx (TPY)	VOC (TPY)	PM10 (TPY)	PM2.5 (TPY)	SOx (TPY)	CO (TPY)	Other: HAP (TPY)	Other: (TPY)
B004154	ICE Compressor #8-10	339.59	8.94	3.60	3.60	0.04	26.28	2.44	
B013092 - B013096	ICE Compressor #11-15	33.96	3.57	3.60	3.60	0.04	7.89	0.98	
B012852 - B012855	Turbine Compressor #1-4	10.42	1.73	2.08	2.08	0.19	5.64	0.06	
B012864 - B012868	New Generator #1-5	1.57	1.26	0.81	0.81	0.024	6.30	0.33	
B004158	Generator - PSVG #5	52.70	0.69	0.22	0.22	0.01	81.48	0.41	
B004159	Air Compressor	15.11	0.20	0.06	0.06	0.004	23.37	0.12	
B008079 - B008080	ICE Compressor #1-2	25.56	5.48	1.27	1.27	0.26	24.10	2.83	
B008081 - B008084	ICE Generator #1-4	1.16	0.58	0.35	0.35	0.02	2.55	0.24	

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL GREENHOUSE GAS EMISSIONS REPORT

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 1437
3. TITLE V PERMIT #: 3101437

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS (Each Unit)							
		CO_2 (TPY)	N_2O (TPY)	CH_4 (TPY)	HFCs (TPY)	PFCs (TPY)	SF_6 (TPY)	Other: (TPY)	$CO_2(e)$ (TPY)
B004154	ICE COMPRESSOR #8-10	8,710.12	4.89	4.10					8,719.11
B013092 - B013096	ICE COMPRESSOR #11-15	8,710.12	4.89	4.10					8,719.11
B012852 - B012855	TURBINE COMPRESSOR #1-4	36,802.81	20.67	17.34					36,840.82
B012864 - B012868	NEW GENERATOR #1-5	4,854.25	2.73	2.29					4,859.27
B004158	GENERATOR - PSVG #5	2,769.82	1.56	1.31					2,772.68
B004159	AIR COMPRESSOR	794.36	0.45	0.37					795.18
B008079 - B008080	ICE COMPRESSOR #1-2	14,346.08	8.06	6.76					14,360.89
B008081 - B008084	ICE GENERATOR #1-4	2,049.44	1.15	0.97					2,051.56

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Generators)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
Permit #s B012864, B012865, B012866, B012867, B012868 Note, emissions are per unit, all 5 generators are the same	Five 1,088 brake horsepower (bhp) natural gas-fired engine generators – GE Power Waukesha VHP-7042GSI S4 with emPact Emission Control System	NOx	167.95	Yes*	Yes, NSPS Subpart JJJJ applicable (64.2.b.1.i)	NO
		ROC	6.30	No*	NA	NO
		CO	83.97	No	NA	NO
		PM10	0.81	No Control Device	NA	NO
		SOx	0.024	No Control Device	NA	NO
		HAP (total)	1.67	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Turbine Compressors)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON FOR EXEMPTION)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
Permit #s B012852, B012853, B012854, B012855 Note, emissions are per unit, all 4 turbine compressors are the same	Four new Siemens-Dresser SGT-300 Gas Turbine Driven Compressors at 7,954 brake-horsepower (bhp) each, with SCR and oxidation catalysts	NOx	17.37	No*	NA	NO
		ROC	8.66	No*	NA	NO
		CO	7.05	No	NA	NO
		PM10	2.08	No Control Device	NA	NO
		SOx	0.19	No Control Device	NA	NO
		HAP (total)	0.32	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Auxiliary Building Existing Air Compressor)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
Permit # B004159	One Waukesha F817QU natural gas-fired internal combustion engine at 160 brake-horsepower (bhp) with NSCR	NOx	15.11	No*	NA	NO
		ROC	0.20	No*	NA	NO
		CO	23.37	No	NA	NO
		PM10	0.06	No Control Device	NA	NO
		SOx	0.004	No Control Device	NA	NO
		HAP (total)	0.30	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Auxiliary Building Existing Generator)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
Permit # B004158	One Ingersoll Rand PSVG Four-Stroke Rich Burn natural gas-fired internal combustion engine at 408 brake-horsepower (bhp) with NSCR	NOx	52.70	No*	NA	NO
		ROC	0.69	No*	NA	NO
		CO	81.48	No	NA	NO
		PM10	0.22	No Control Device	NA	NO
		SOx	0.01	No Control Device	NA	NO
		HAP (total)	1.03	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Plant 2 Clark Compressors Pre-Retrofits)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
B013092, B013093, B013094, B013095, B013096 Note, emissions are per unit, all 5 Clarks 11 – 15 are the same	Clarks 11 - 15 Compressors in Plant 2	NOx	144.45	No Control Device	NA	NO
		ROC	8.94	No Control Device	NA	NO
		CO	26.28	No Control Device	NA	NO
		PM10	3.60	No Control Device	NA	NO
		SOx	0.04	No Control Device	NA	NO
		HAP (total)	2.44	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Plant 2 Clark Compressors Post-Retrofits)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
B013092, B013093, B013094, B013095, B013096 Note, emissions are per unit, all 5 Clarks 11 – 15 are the same	Clarks 11 - 15 Retrofit compressors in Plant 2 with oxidation catalyst systems	NOx	144.45	No Control Device	NA	NO
		ROC	8.94	No*	NA	NO
		CO	26.28	No	NA	NO
		PM10	3.60	No Control Device	NA	NO
		SOx	0.04	No Control Device	NA	NO
		HAP (total)	2.44	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Plant 1 Existing Compressors)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
Permit # B004154	Three Dresser-Clark HBA8 natural gas-fired engines at 1,760 brake-horsepower (bhp)	NOx	339.59	No Control Device	NA	NO
		ROC	8.94	No Control Device	NA	NO
		CO	26.28	No Control Device	NA	NO
		PM10	3.60	No Control Device	NA	NO
		SOx	0.04	No Control Device	NA	NO
		HAP (total)	2.44	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Plant 3 Existing Compressors)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
Permit #s B008079, B008080 Note, emissions are per unit, both generators are the same	Two Caterpillar G3612 Direct Injected, Turbo Charged, After Cooled, Four-stroke Lean Burn natural gas-fired internal combustion generators at 3,785 brake-horsepower (bhp) each, with oxidation catalysts	NOx	103.88	No Control Device	NA	NO
		ROC	14.47	No*	NA	NO
		CO	68.31	No	NA	NO
		PM10	1.27	No Control Device	NA	NO
		SOx	0.26	No Control Device	NA	NO
		HAP (total)	8.81	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING

APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Blythe Compressor Station
2. FACILITY ID: 01437
3. TITLE V PERMIT #: 3101437

II. CAM STATUS SUMMARY FOR EMISSION UNITS – (Existing Generators – Central Supporting)

4. Based on the criteria in the instructions (check one and attach additional pages as necessary)
a. ☐ There are no emissions units with control devices at this Title V facility
b. ☒ There are emissions units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM Plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
Permit #s B008081, B008082, B008083, B008084 Note, emissions are per unit, all generators are the same	Four existing Caterpillar G3412 SI TA Turbo Charged, After Cooled, Four-Stroke Rich Burn natural gas-fired internal combustion generators at 4,000 brake-horsepower (bhp) each, with non-selective catalytic reduction systems	NOx	61.74	No*	NA	NO
		ROC	2.32	No*	NA	NO
		CO	30.87	No	NA	NO
		PM10	0.35	No Control Device	NA	NO
		SOx	0.02	No Control Device	NA	NO
		HAP (total)	0.76	No Control Device	NA	NO

* Note: NOx and ROC Major Source Threshold for Blythe is 100 tpy (Zone B) per Rule 1201 definition

APPENDIX C Public Notice

NOTICE OF TITLE V PERMIT RENEWAL

NOTICE IS HEREBY GIVEN THAT Southern California Gas Company-Blythe Compressor Station, located at 13100 West 14th Avenue Blythe, CA 92225, has applied for the renewal of their Federal Operating Permit (FOP) pursuant to the provisions of MDAQMD Regulation XII. The Applicant is a company engaged in the compression and distribution of pipeline quality natural gas for use by its customers throughout Southern California. The facility is required to maintain a Title V permit because the potential emissions exceed the major source thresholds for Carbon Monoxide, Nitrous Oxides, and Hazardous Air Pollutants.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed renewal of Southern California Gas Company-Blythe Compressor Station's Federal Operating Permit. If you submit written comments, you may also request a public hearing on the proposed issuance of the Federal Operating Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 4:00 P.M. on November 6, 2020, to the MDAQMD, Attention: Samuel J Oktay, PE at the address listed below.

PETITION FOR REVIEW: Federal Operating Permits are also subject to review and approval by the United States Environmental Protection Agency (USEPA). If the USEPA finds no objection to the proposed permit renewal, the final permit will be issued. In the event of public objection to the issuance of a specific permit, a Title V petition may be submitted to the USEPA Administrator electronically through the Central Data Exchange at: https://cdx.epa.gov/. In order to file a Title V petition, issues must be raised with reasonable specificity during the public comment period, and filed within 60 days of the close of the USEPA review period.

AVAILABILITY OF DOCUMENTS: The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, CA 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry. Please contact Samuel J Oktay, PE, Air Quality Engineer, at the address, above, or (760) 245-1661, extension 1610, or at soktay@mdaqmd.ca.gov for additional questions pertaining to this action and/or corresponding documents.

Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661

SHERI HAGGARD
Engineering Supervisor II
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392

Mr. Larry Trowsdale
mchsi
951 E Skylark Ave
Ridgecrest, CA 93555

Chief, Planning Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Mr. Mike Sword
Planning Div Mgr, Clark Co Dept of Air Q and
4701 Russell Road, Suite 200
Las Vegas, NV 89118

Environmental Manager
Duffield Marine, Inc.
17260 Muskrat Avenue
Adelanto, CA 92301

Mr. Jon Boyer
High Desert Power Project LLC
19000 Perimeter Rd
Victorville, CA 92394

Ms. Carol Kaufman
Metropolitan Water District
700 N Alameda Street, 8th Floor, Rm 106
Los Angeles, CA 90012

Mr. John F. Espinoza
Principal Advisor, MP Materials
HC1 Box 224, 67750 Bailey Road
Mountain Pass, CA 92366

Chief, Bureau of Air Quality
NDCNR, Env Prot Div (Air)
901 South Stewart St, Suite 4001
Carson City, NV 89701-5249

Mr. Steve Smith
SB County Transportation Authority
1170 W. Third Street, Second Floor
San Bernardino, CA 92410

Environmental Contact
Specialty Minerals Inc.
P.O. Box 558
Lucerne Valley, CA 92356-0558

Ms. Janet Laurain
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd., St. 1000
South San Francisco, CA 94080-7037

Ms. Desirea Haggard
Environmental Manager, CalPortland-Oro
2025 E Financial Way
Glendora, CA 91741

Mr. Michael Olokode
Air Program Manager, N45NCW, NAWS
429 E Bowen Rd, Stop 4014
China Lake, CA 93555-6108

Mr. Randy Lack
Chief Marketing Officer, Element Markets,
3555 Timmons Lane, Suite 900
Houston, TX 77027

Mr. Glen King
Environmental Manager, Luz Solar Partners
43880 Harper Lake Road
Harper Lake, CA 92347

Mr. David Rib
Environmental Manager, Mitsubishi Cement
5808 State Highway 18
Lucerne Valley, CA 92356-9691

Mr. Mark Solheid
Senior EHS Analyst, NASA/Goldstone DSCC
93 Goldstone Road
Fort Irwin, CA 92310

Mr. Dan Madden
Plant Manager, Northwest Pipe Co.
12351 Rancho Road
Adelanto, CA 92301

Mr. Anoop Sukumaran
Environmental Engineer, Searles Valley
P.O. Box 367
Trona, CA 93592-0367

Director, Air Division (Attn: AIR-3)
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Mr. Ramon Campos
Environmental Compliance Manager, Blythe
385 N Buck Blvd
Blythe, CA 92225

City Manager
City of Barstow
220 East Mountain View, Suite A
Barstow, CA 92311

Mr. Pedro Dumaua
HS&E Manager, Ducommun Aerostructures
4001 El Mirage Road
Adelanto, CA 92301

Ms. Christine Grandstaff
Evolution Markets
27801 Golden Ridge Lane
San Juan Capistrano, CA 92675

Mr. Mike Plessie
HQBN B CO, NREA MCAGCC
Box 788110
Twentynine Palms, CA 92278-8110

Environmental Manager
Mobile Pipe Lining & Coating, Inc
12766 Violet Road
Adelanto, CA 92301

Mr. Don Shepherd
National Park Service, Air Resources Div
12795 W Alameda Pkwy
Lakewood, CO 80228

Mr. Kou Thao
Environmental Scientist, PG&E
P.O. Box 7640
San Francisco, CA 94120

Ms. Karin Fickerson
Air Quality Team Lead, SoCalGas
1650 Mountain View Avenue
Oxnard, CA 93030

Ms. Anne McQueen
Senior Engineer, Yorke Engineering, LLC
31726 Rancho Viejo Road, Suite 218
San Juan Capistrano, CA 92675

Figure 1: MDAQMD contact list of persons requesting notice of actions

Air Program Manager
Environmental Division, USMC MCLB
Box 110170 Bldg 196
Barstow, CA 92311

Air Program Manager, Bureau of Indian
1451 Research Park Drive, Suite 100
Riverside, CA 92507

Mr. Steve Cummings
Senior Air Quality Tech Specialist, Southern
P.O. Box 800
Rosemead, CA 91770

Mr. Ralph McCullers
EH&S Manager, OMYA (California), Inc.
7225 Crystal Creek Rd
Lucerne Valley, CA 92356

Mr. Josh Dugas
Division Chief, San Bernardino County EHS
385 N Arrowhead Ave, Second Floor
San Bernardino, CA 92415-0160

Mr. Dan Guillory
Environmental Contact, Metropolitan Water
P O Box 54153
Los Angeles, CA 90054

Ms. Dolores Wyant

18710 Corwin Road
Apple Valley, CA 92307

Mr. Tom Lucas
Drew Carriage
5540 Brooks Street
Montclair, CA 91763

Ms. Alison Wong
Technical Advisor, SoCalGas
8101 Rosemead Blvd, SC722P
Pico Rivera, CA 90660

Ms. Alejandra Silva
Environmental Manager, CEMEX
16888 North E Street
Victorville, CA 92392

Ms. Kiersten Melville
Metropolitan Water District
700 N Alameda Street, 8th Floor Rm 106
Los Angeles, CA 90012

Andrew Salas
Chairman, Gabriel Band of Mission Indians -
PO Box 393
Covina, CA 91723

Mr. James Sharp
HSE Manager, Elementis Specialties
31763 Mountain View Road
Newberry Springs, CA 92365

Mr. Joseph Hower
Principal, Air Sciences, Ramboll Environ
350 S Grand Ave, Ste 2800
Los Angeles, CA 90017

Ms. Cinnamon Smith
Sr. Specialist - Permitting & Compliance,
1001 Louisiana Street, 891H
Houston, TX 77002

Mr. Zeyd Tabbara
Broker, BGC Environmental Brokerage
1 Seaport Plaza
New York, NY 10038

Ms. Jaclyn Ferlita
Air Quality Consultants
5881 Engineer Drive
Huntington Beach, CA 92649

Mr. Kou Thao
Air Quality, Pacific Gas and Electric (Attn Air
P.O. Box 7640
San Francisco, CA 94120

Mr. Carlos Gaeta
Southern California Gas Company
17071 Gas Line Rd, M/L SC700F
Victorville, CA 92394-1007

Mr. Rick Renteria
EH&S Manager, Northwest Pipe Co.
12351 Rancho Road
Adelanto, CA 92301

Ms. Lisa Beckham
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Chief, San Gabriel Band of Mission Indians
PO Box 693
San Gabriel, CA 91778

Ms. Jenna Latt
CARB/Office of Ombudsman
9480 Telstar Avenue, Annex 1
El Monte, CA 91731

Mrs. Samantha Lopez
Permit Engineer, Mojave Desert AQMD
14306 Park Ave
Victorville, CA 92392

Mr. John Vidic
Air Program Manager, USAF 412
120 N. Rosamond Blvd, Bldg. 3735 (Ste A)
Edwards AFB, CA 93524

Ms. Alexandra Minitrez
Air Compliance Specialist, MP Materials
HC1 Box 224, 67750 Bailey Road
Mountain Pass, CA 92366

Ms. Courtney Graham
Manager, Permit Evaluation Section,,
P.O. Box 2815
Sacramento, CA 95812

Ms. Chanice Allen
Environmental Team Lead, SoCalGas
8101 Rosemead Blvd, SC722P
Pico Rivera, CA 90660

Mr. Robert Leone
Governing Board Member, Town of Yucca
57090 29 Palms Highway
Yucca Valley, CA 92284

Figure 1: MDAQMD contact list of persons requesting notice of actions (continued from previous page)

APPENDIX D

Continuous Parameter Monitoring System (CPMS) Plan

Southern California Gas Company
Blythe Compressor Station
Compressors 1 and 2 at Plant 3

I. Applicability

This Continuous Parametric Monitoring System (CPMS) Plan is applicable to two lean burn engines equipped with oxidation catalyst used to drive natural gas pipeline compressors at Southern California Gas Company Blythe Compressor Station. This plan covers requirements related to:

Parametric Monitoring Protocol required by MDAQMD Permit Conditions.

A. Emission Units

Facility: Southern California Gas Company
Blythe Compressor Station
13100 W. 14th Avenue
Blythe, CA 92225

MDAQMD Federal Operating Permit No.: 3101437
MDAQMD Company No.: 031
MDAQMD Facility No.: 01437

Descriptions: Caterpillar Model No. G3612,
3785 BHP @ 1000 rpm

Permit Nos.: Unit 1: Mojave Desert AQMD No. B008079 (engine) and C008086 (catalyst)
Unit 2: Mojave Desert AQMD No. B008080 (engine) and C008087 (catalyst)

B. Control Technology

These two engines are equipped with oxidation catalysts to reduce CO and VOC emissions. They also employee Pre-Combustion Chambers (PCC) to reduce NOx. PCC is also called Low Emission Combustion (LEC) by EPA.

C. Applicable Emission Limits, and Monitoring Requirements

Permit Parametric Monitoring Protocol Requirements

Permit conditions require keeping exhaust temperature within the effective operating range specified by the catalyst manufacture.

Pollutants Controlled by the oxidation catalyst and corresponding permit limits

VOC: 0.15 g/BHP-hr, 1.3 lb/hr, and 10,946 lb/year
CO: 0.66 g/BHP-hr, 5.51 lb/hr, and 48,244 lb/year

APPENDIX D: Southern California Gas Company
Blythe Compressor Station Compressors 1 and 2 at Plant 3

National Emissions for Hazardous Air Pollutant

These engines are not subject to National Emission for Hazardous Air Pollutants. Each engine is an existing 4SLB with a site rating of more than 500 brake HP located at a major source of HAP emissions and therefore exempt from 40 CFR Part 63 Subpart ZZZZ emission limitation and operating limitation requirements per 63.6600(c).

II. Monitoring Approach

Indicator	**Catalyst Inlet Temperature**	**Catalyst Outlet Temperature**
Measurement Approach	Thermocouple	Thermocouple
Indicator Range	≥ 600°F Excludes periods of start-up and shut-down.	< 1200°F. Excursions are not triggered unless the shut down fails to trip at 1200°F.
Performance Criteria *Data Representative-ness*	This indicator is specified by the catalyst manufacture.	This indicator is specified by the catalyst manufacture
QA/QC Practices and Criteria	Engine control system checks for open and out of range thermocouple.	Engine control system checks for open and out of range thermocouple.
Monitoring Frequency	The temperature is monitored by the station control system.	The shut down is triggered by the station control system.
Data Collection Procedures	Station control system alarm log.	Station control system alarm log.
Averaging Period	One hour average commensurate with the one-hour period emission standards specified in the permits.	Not applicable.

III. Justification

The rational for selection of each performance indicator, and its corresponding range, is given in the section. However, information for the fuel meter is not included since standard industry and Southern California Gas Company practices are being followed, and this methodology is routinely used for emission reporting.

Inlet Catalyst Temperature

A minimum inlet temperature is needed for proper catalyst operation.

Outlet Catalyst Temperature

Elevated temperatures can cause catalyst degradation or damage. As a monitoring parameter, the catalyst outlet rather than inlet is preferred because it not only will in indicate high engine exhaust temperature, but also excessive heating of the catalyst.

B. *Rationale for Selection of Indicator Range or Level*

Inlet Catalyst Temperature

In accordance with catalyst specifications the minimum temperature required to meet the permit limits is 600°F. Lower temperatures may provide acceptable pollutant reduction if verified through emission testing. This value is also specified in the NESHAP regulations.

Outlet Catalyst Temperature

In accordance with the catalyst specifications, the catalyst may be damaged if the exhaust temperature goes over 1200°F.

IV. Calibration

Calibrations are verified at least annually, with records of the calibration kept on file.

A. Thermocouples

Type J or K thermocouples meet the minimum accuracy requirements specified in 40 CFR 63.6625(b)(4) "…the temperature sensor must have a minimum tolerance of 2.8 degrees Celsius (5 degrees Fahrenheit) or 1 percent of the measurement range, whichever is larger."

Accuracy is verified annually using a temperature calibration device, or by validating the thermocouple against a second temperature sensor installed in the exhaust system by reading within 16.7°C or 30°F of the exhaust thermocouple. Alternatively, the thermocouple may simply be replaced.

APPENDIX D: Southern California Gas Company
Blythe Compressor Station Compressors 1 and 2 at Plant 3

V. Missing Data Procedures

Data can be substituted as described below if monitored data is missing.

A. Catalyst Inlet or Outlet Temperature

Catalyst inlet or outlet temperatures can be used interchangeably to assure operation within the range specified by the regulations and manufacturer. For example, inlet temperature can be used if outlet temperature is missing, and vice versa. Alternatively, catalyst inlet temperature can be scaled from historical catalyst temperature differential (catalyst outlet minus catalyst inlet temperature) or turbocharger temperature differential (turbocharger inlet temperature minus catalyst inlet temperature).

APPENDIX E
SoCalGas
Blythe Compressor Station
Generators G1 through G4, Generator 5, and Air Compressor

I. Applicability

This Continuous Parametric Monitoring System (CPMS) Plan is applicable to six rich burn natural gas engines used to generate power and provide air at the SoCalGas Blythe Compressor Station. These six engines are equipped with Non-Selective Catalytic Reduction (NSCR) systems. This plan covers requirements related to:

Parametric Monitoring Protocol required by MDAQMD Permit Conditions, and
Site Specific Monitoring Plan for National Emission Standards for Hazardous Air Pollutants

A. Emission Units

Facility: Southern California Gas Company
Blythe Compressor Station
13100 W. 14th Avenue
Blythe, CA 92225

MDAQMD Federal Operating Permit No.: 3101437
MDAQMD Company No.: 031
MDAQMD Facility No.: 01437

Descriptions: Generator Units G1 through G4
Caterpillar Model No. G3412 SI TA, 400 BHP @ 1200 rpm, 275 kW generator

Generator Unit G5
Ingersoll-Rand Model No. PSVG, 408 BHP @ 514 rpm, 280 kW generator

Air Compressor engine
Waukesha Model No. F817QU, 160 BHP @ 1800 rpm

Permit Nos.: Generator G1: Mojave Desert AQMD No. B008081 (engine) and C008089 (catalyst)
Generator G2: Mojave Desert AQMD No. B008082 (engine) and C008090 (catalyst)
Generator G3: Mojave Desert AQMD No. B008083 (engine) and C008091 (catalyst)
Generator G4: Mojave Desert AQMD No. B008084 (engine) and C008092 (catalysts)
Generator G5: Mojave Desert AQMD No. B004158 (engine and catalyst)
Air Compressor: Mojave Desert AQMD No. B004159 (engine and catalyst)

APPENDIX E: SoCalGas Blythe Compressor Station
Generators G1 through G4, Generator 5, and Air Compressor

B. Control Technology

All these engines are rich burn and equipped with Non-Selective Catalytic Reduction (NSCR) system, also known as 3-way catalyst, for reduction of NOx, CO, and VOC emissions. However, NSCR on Generator G5 and the Air Compressor engine are only used to reduced formaldehyde emissions.

C. Applicable Emission Limits, and Monitoring Requirements

Permit Parametric Monitoring Protocol Requirements

Permit conditions require keeping exhaust temperature within the effective operating range specified by the manufacture, and weekly check to ensure that the manufacture specified oxygen concentration for optimal catalyst efficiency is maintained. This plan provides an alternative method for oxygen content monitoring as allowed by the permit.

Pollutants Controlled by NSCR and Corresponding Permit Limits

Generators G1 through G4

NOx: 0.15 g/BHP-hr, 0.27 lb/hr, and 2317 lb/year
VOC: 0.15 g/BHP-hr, 0.13 lb/hr, and 1159 lb/year
CO: 0.66 g/BHP-hr, 0.58 lb/hr, and 5100 lb/year

National Emissions for Hazardous Air Pollutants Monitoring Requirements

Generators G1 through G4, Generator G5, and Air Compressor engine are 4-stroke rich burn engines at a Major HAP source using NSCR subject to Table 5.12 of 40 CFR 60 Subpart ZZZZ. The NESHAP rule does not specify a CPMS, but 63.6625(e) requires a maintenance plan. Adherence to the Permit Parametric Monitoring discussed above for catalyst temperature satisfies 63.6625(e). An initial emission test was conducted in 2016 to demonstrate compliance with the formaldehyde limit. Since these engines are not subject to an operating parameter that must be "reestablished" as described in 63.6640(b), there is no need for formaldehyde test beyond the initial one, even if the catalyst is changed.

NESHAP Limit for Generators G1 through G4, Generator 5, and Air Compressor Engine:

CH2O: < 10.3 ppm @ 15% O2

2

APPENDIX E: SoCalGas Blythe Compressor Station
Generators G1 through G4, Generator 5, and Air Compressor

II. Monitoring Approach

Indicator	Air Fuel Ratio Controller (AFRC) Alarm Status Units G1 through G4 Only	Catalyst Inlet Exhaust Temperature & Alarm	Catalyst Outlet Exhaust Temperature Shutdown
Measurement Approach	The AFRC provides an alarm when it is not working properly including inability to achieve oxygen sensor set point.	Thermocouple	Thermocouple
Indicator Range	Discrete alarm. Excludes periods of start-up not to exceed 30 minutes.	750°F ≤ exhaust ≤ 1250°F Excludes periods of start-up not to exceed 30 minutes.	exhaust ≤ 1250°F
Performance Criteria *Data Representative-ness*	The AFRC is designed to keep oxygen concentration below 0.5% as specified by the catalyst manufacturer.	Lower threshold specified by catalyst manufacture. Upper threshold 1350°F by manufacture, but 1250°F is maximum allowed by NESHAP	Maximum allowed by NESHAP.
QA/QC Practices and Criteria	Alarm is part of AFRC firmware; no QA/QC is specified by AFRC manufacture.	Engine control system checks for open and out of range thermocouple. Calibration verified annual or replaced.	Engine control system checks for open and out of range thermocouple. Calibration verified annual or replaced.
Monitoring Frequency	Daily check.	Daily check.	The shutdown is triggered by the station control system.
Data Collection Procedures	Station control system alarm log.	Station control system alarm and data log.	Station control system alarm log.
Averaging Period	Not applicable for discrete event.	Not applicable for daily check.	Not applicable for discrete event.

APPENDIX E: SoCalGas Blythe Compressor Station
Generators G1 through G4, Generator 5, and Air Compressor

III. Justification

The rational for selection of each performance indicator, and its corresponding range, is given in the section. However, information for the fuel meter is not included since standard industry and Southern California Gas Company practices are being followed, and this methodology is routinely used for emission reporting.

A. *Rationale for Selection of Performance Indicators*

Air Fuel Ratio Controller Alarm – only applicable to Generators G1 through G4

The catalyst manufacturer specifies that engine exhaust oxygen concentration must be less than 0.5% because a reducing exhaust chemistry is needed for proper NSCR system operation. An AFRC is used to keep the engine operating below 0.5% oxygen through a feedback control of an oxygen sensor. Due to the high levels of carbon monoxide (CO) and unburned hydrocarbons (HC) upstream of the catalyst, the oxygen sensor does not provide a true oxygen concentration measurement. CO and HC oxidize on the sensor's platinum anode, which results in a net rather than total oxygen measurement. However, this interference improves the control because it makes the sensor extremely sensitive to small changes in AFR. Therefore, the AFRC keeps the engine running at a specific AFR where the oxygen concentration is less than 0.5%. If the AFRC cannot maintain the oxygen sensor set point, an alarm is triggered.

Inlet Catalyst Temperature

A minimum inlet temperature is needed for proper catalyst operation.

Outlet Catalyst Temperature

Elevated temperatures can cause catalyst degradation or damage. As a monitoring parameter, the catalyst outlet rather than inlet is preferred because it not only will in indicate high engine exhaust temperature, but also excessive heating of the catalyst.

B. *Rationale for Selection of Indicator Range or Level*

Air Fuel Ratio Controller Alarm - only applicable to Generators G1 through G4

The AFRC firmware logic can readily indicate its inability to control AFR through an alarm. Therefore, there is no range for this indicator, rather a discrete indication: either the controller is in alarm, or not. The controller alarms whenever one of the following conditions exists:

The AFRC cannot reach the oxygen sensor set point because the fuel control valve reaches its maximum or minimum position. If the engine is running too lean, and the controller cannot open the valve any further to richen the mixture, the controller has hit its rich limit warning. Similarly, if the engine is running too rich, and the controller cannot close the valve any further to lean the mixture, the controller has hit its lean limit warning.

The AFRC senses a cold, disconnected, or failed sensor when the inlet catalyst thermocouple indicates adequate exhaust temperature.

The AFRC senses a shorted or failed sensor. The firmware checks to make sure the sensor output voltage is within the usable range.

Inlet Catalyst Temperature

In accordance with catalyst specifications the minimum temperature required to meet the permit limits is 750°F. Lower temperatures may provide acceptable pollutant reduction if verified through emission testing. This value is also specified in the NESHAP regulations.

Outlet Catalyst Temperature

In accordance with the catalyst specifications, the catalyst may be damaged if the exhaust temperature goes over 1350°F. The value specified by NESHAP, 1250°F, is more stringent than the manufacturer's recommendation.

IV. Calibration

Calibrations are verified at least annually, with records of the calibration kept on file.

A. Thermocouples

Type J or K thermocouples meet the minimum accuracy requirements specified in 40 CFR 63.6625(b)(4) "…the temperature sensor must have a minimum tolerance of 2.8 degrees Celsius (5 degrees Fahrenheit) or 1 percent of the measurement range, whichever is larger."

Accuracy is verified annually using a temperature calibration device, or by validating the thermocouple against a second temperature sensor installed in the exhaust system by reading within 16.7°C or 30°F of the exhaust thermocouple. Alternatively, the thermocouple may simply be replaced.

V. Missing Data Procedures

Data can be substituted as described below if monitored data is missing.

A. Air Fuel Ratio Controller Alarm

If the absence of an AFRC alarm cannot be verified for a given day, actual operating data can be used to demonstrate that the AFRC was working properly, for example, comparison of oxygen sensor setpoint and output within 20%, confirmation that AFRC is in closed loop control, etc.

B. Catalyst Inlet or Outlet Temperature

Catalyst inlet or outlet temperatures can be used interchangeably to assure operation within the range specified by the regulations and manufacturer. For example, inlet temperature can be used if outlet temperature is missing, and vice versa. Alternatively, catalyst inlet temperature can be scaled from historical catalyst temperature differential (catalyst outlet minus catalyst inlet temperature) or turbocharger temperature differential (turbocharger inlet temperature minus catalyst inlet temperature).