TECHNICAL REVIEW DOCUMENT for OPERATING PERMIT 00OPDO225

to be issued to:

TransColorado Gas Transmission Company

Dolores Compressor Station

Dolores County

Source ID 0330019

Cathy Rhodes June, 2000

I. PURPOSE:

This document will establish the basis for decisions made regarding the applicable requirements, emissions factors, monitoring plan and compliance status of emission units covered by the operating permit proposed for this site. It is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. This narrative is intended only as an adjunct for the reviewer and has no legal standing. The conclusions made in this report are based on information provided in the original application submittal of April 20, 2000.

Any revisions made to the underlying construction permits associated with this facility in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. SOURCE DESCRIPTION:

This facility is located in Dolores County, on private land surrounded by the San Juan National Forest approximately 13 miles northeast of Dolores, Colorado and 0.6 miles east of Beaver Creek. The area is classified as attainment for all pollutants. Mesa Verde National Park is a Federal Class I designated area within 100 kilometers of the plant. Utah and New Mexico are affected states within 50 miles.

The Dolores Compressor Station is a natural gas transmission facility. Natural gas is compressed for transmission to sales pipelines using reciprocating engines driving gas compressors. Electrical power is also generated on-site, for use at the station, using reciprocating engines driving generators.

The facility is not subject to the requirements of 112(r) (Accidental Release Program).

The source emits major amounts of Hazardous Air Pollutants (HAPs). The EPA promulgated Maximum Achievable Control Technology (MACT) standards for Oil and Natural Gas Production Facilities, and for Natural Gas Transmission and Storage Facilities on June 17, 1999. Facilities that do not contain affected sources (glycol dehydration units, storage vessels with the potential for flash emissions, etc.), are not subject to the MACT requirements. The Dolores Compressor Station does not contain any affected sources, and is not subject to the MACT requirements.

Facility wide emissions are as follows:

Pollutant	Potential (TPY)	Actual (TPY)
Nitrogen Oxides (NO _x)	66	N/A
Volatile Organic Compounds (VO	C) 44	N/A
CO	155	N/A
HAPs	N/A	26

HAPs consist mainly of formaldehyde.

Potential emissions are based on permitted emission limits. The station has not begun normal operation, therefore actual emissions are currently less than potential emissions, but can not be determined.

III. Emission Sources

The following sources are specifically regulated under terms and conditions of the Operating Permit for this site:

S01 and S02 - Caterpillar G3612 LE Engines E367 and E368

Initial Approval Construction Permit 98DO184 was issued for these engines. Applicable requirements are as follows.

Construction Permit 98DO184

- Limits opacity to 20%, except during certain operating conditions, when opacity shall not exceed 30% (Colorado Regulation No. 1, Section II.A.1 and 4)
- Limits emissions of NO_x, VOC, and CO on a twelve month rolling basis
- Limits consumption rate of natural gas on a rolling twelve month basis
- Requires a source compliance test for NO_x and CO (This test was completed on August 10, 2000.)

S03 and S04 - Waukesha L36GL Engines E371 and E372

Final Approval Construction Permit 98DO185 was issued for these engines. Applicable requirements are as follows.

Construction Permit 98DO185

- Limits opacity to 20%, except during certain operating conditions, when opacity shall not exceed 30% (Colorado Regulation No. 1, Section II.A.1 and 4)
- Limits emissions of NO_x, VOC, and CO on an annual basis
- Limits consumption rate of natural gas on an annual basis

Emission Factors - Emission estimates are based on 1.2 times the manufacturer-s estimates.

Monitoring - The permittee will calculate monthly emissions based on fuel consumption and annual emissions for fee purposes based on hours of operation. The Division has developed specific monitoring guidance for Internal Combustion engines located in attainment areas, as shown on the attached grid titled **A**Compliance/Scenario Summary - Gas Fired IC Engines. The emission factors proposed are below AP-42 factors for NO_x, therefore, according to the monitoring grid, the source will be required to: conduct the emission calculations and record fuel use on a rolling twelve month basis; and perform quarterly portable monitoring. The air/fuel ratio is relegated based on the btu content of the natural gas. The permittee will record annual hours of operation.

Compliance with the opacity limits is assumed when natural gas is used as a fuel.

Compliance Status - The Division believes that these sources were in compliance with all applicable requirements as of the date of application,

IV. Alternate Operating Scenarios

The permittee is allowed to replace the permitted engines with temporary engines during periods of maintenance, repair, etc. In addition, the permitted engines may be replaced permanently. The operating permit sets forth specific provisions which must be met in order for the facility to use these Alternate Operating Scenarios. Replacement engines will be exact replicas of the permitted engines.

V. Short Term Limits

On April 16, 1998 the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction Permits. These procedures are being directly implemented in all operating permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/throughput limits that appeared in the construction permits associated with this facility that are not required by a specific State or Federal standard or by the above referenced Division procedures have been

deleted and all annual emission and production/throughput limits converted to a rolling 12 month total. Note that, if applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison with annual emission limits unless there is a specific condition in the permit restricting hours of operation.

The construction permits contained no short term limits, however the operating permit requires that the annual emission limits set forth in Construction Permit 98DO185 be complied with on a rolling twelve month basis.