

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Table A: Limits and Other Requirements

Table B: Submittals

Mr. Bob Lindholm

Page 2

NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(612) 296-6300
------------	----------------

Outside Metro Area	1-800-657-3864
--------------------	----------------

TTY	(612) 282-5332
-----	----------------

The rule governing these programs are contained in Minn. Rules chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. Rules pt. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Requirements which have been determined not to apply are listed in Table A of this permit, at the beginning of total facility requirements.

The permit shield, however does not apply to: Minn. Rules ch. 7030 (Noise Pollution Control).

FACILITY DESCRIPTION

The facility will consist of a natural-gas turbine and an emergency generator. The potential emissions from the facility are less than the state thresholds; however, they are required to get a state permit since a federal New Source Performance Standard for Stationary Gas Turbines, 40 CFR pt. 60, subp. GG applies to the facility.

**AIR EMISSION PERMIT NO. 13100058-001
IS ISSUED TO**

Northern Natural Gas Company
1111 South 103rd Street
Omaha, Nebraska 68124

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application:

Total Facility Operating Permit 01/29/96

This permit authorizes the permittee to operate and construct the Northern Natural Gas - Faribault Compressor Station near Faribault, Rice County, Minnesota. The permittee must comply with all the conditions of the permit and with all general conditions listed in Minn. Rules pt. 7007.0800, subp. 16. Any changes or modifications to the stationary source must be performed in compliance with Minn. Rules pts. 7007.1150 to 7007.1500. Terms used in the permit as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: State ; True Minor

Issue Date: June 5, 1996

Expiration: Permit does not expire

Lisa J. Thorvig
Division Manager
Air Quality Division

for Charles W. Williams
Commissioner
Minnesota Pollution Control Agency

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/05/96

Facility Name: Northern Natural Gas - Faribault

Permit Number: 13100058 - 001

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: Total Facility

What to do	Why to do it
The Permittee shall submit a modification application in accordance with Minn. R. 7007.1150 through Minn. R. 7007.1500 if the maximum 10,600 brake horsepower allowed by the Federal Energy Regulatory Commission (FERC) is increased.	Minn. R. 7007.0800, subp. 2
Shutdowns: Notify the Commissioner at least 24 hours in advance of shutdown of any process or control equipment if the shutdown would cause an increase in the emission of air contaminants. At the time of notification, notify the Commissioner of the cause of the shutdown and the estimated duration. Notify the Commissioner again when the shutdown is over.	Minn. R. 7019.1000, subp. 1
Breakdowns: Notify the Commissioner immediately of a breakdown of more than one hour duration of any process or control equipment if the breakdown causes an increase in the emission of air contaminants. At the time of notification or as soon thereafter as possible, the permittee shall also notify the Commissioner of the cause of the breakdown and the estimated duration. Notify the Commissioner again when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Oral Notification of Deviations Endangering Human Health or the Environment: Within 24 hours of discovery, orally notify the Commissioner of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7007.0800, subp. 6(A)
Discovery of Deviations Endangering Human Health or the Environment Report (written): due two working days after discovery of deviation, submit a written description of any deviation endangering human health or the environment to the Commissioner. Include the following information in this written description: cause of the deviation; exact dates of the period of the deviation; if the deviation has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7007.0800, subp. 6(A)
Application for Permit Amendment: If you need a permit amendment, submit application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Emission Fees: due 60 days after receipt of an MPCA bill	Minn. R. 7002.0005 through Minn. R. 7002.0095
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises, to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Record keeping: Retain all records at the Northern Natural Gas Co. Owatonna Pipeline Warehouse, RR 4, Box 86 [telephone: 507-451-7760], for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Extension Requests: The permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/05/96

Facility Name: Northern Natural Gas - Faribault

Permit Number: 13100058 - 001

Subject Item: SV 001**Associated Items:** EU 001 Gas Turbine

What to do	Why to do it
Performance Test: due 180 days after Initial Startup but no later than 60 days after achieving maximum production rate to determine compliance with the NOx limit in 40 CFR 60.332(d)	40 CFR Section 60.8(a)
Performance Test Pre-test Meeting: due 7 days before Performance Test for NOx	Minn. R. 7017.2030, subp. 4
Nitrogen Oxides: less than or equal to 0.0157 percent by volume at 15 percent oxygen and on a dry basis.	40 CFR Section 60.332(d)
Sulfur Dioxide: less than or equal to 0.015 percent by volume at 15 percent oxygen and on a dry basis.	40 CFR Section 60.333(a)

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/05/96

Facility Name: Northern Natural Gas - Faribault

Permit Number: 13100058 - 001

Subject Item: SV 002**Associated Items:** EU 002 Emergency Generator

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity once operating temperatures have been obtained. The averaging time for this limit is any ten consecutive seconds.	Minn. R. 7011.2300 subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/05/96

Facility Name: Northern Natural Gas - Faribault

Permit Number: 13100058 - 001

Subject Item: EU 001 Gas Turbine**Associated Items:** SV 001

What to do	Why to do it
Sulfur Content of Fuel: less than or equal to 0.8 percent by weight	40 CFR Section 60.333(b)
Reporting: If there is a change in fuel supply, the Permittee must notify the MPCA of such change for re-examination of the custom fuel-monitoring schedule. A substantial change in fuel quality shall be considered as a change in fuel supply. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.	40 CFR Section 60.334(b)
Permittee shall limit turbine output to 10,600 brake horsepower as allowed by the Federal Energy Regulatory Commission (FERC). If the Permittee submits a request to FERC for an increase in the brake horsepower limit, then the Permittee must submit a modification application to the MPCA in accordance with Minn. R. 7007.1150 to 7007.1500.	Minn. R. 7007.0800 subp. 2
Fuel burned: Natural gas only	Minn. R. 7007.0800, subp. 2
Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method.	40 CFR Section 60.334(b)
Sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR ' 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters.	40 CFR Section 60.334(b)
Sulfur Monitoring: If, after the first 2 years of sulfur monitoring, the sulfur content of the fuel shows little variability and, when calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR ' 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.	40 CFR Section 60.334(b)
Notification of noncompliance: Should any sulfur analysis indicate noncompliance with 40 CFR ' 60.333, the Permittee shall notify the MPCA of such excess emissions and the custom fuel monitoring schedule shall be re-examined by the Administrator. Sulfur monitoring shall be conducted weekly during the interim period when this custom fuel-monitoring schedule is being re-examined.	40 CFR Section 60.334(b)
Recordkeeping: Records of sample analyses and fuel supply pertinent to the custom fuel-monitoring schedule shall be retained for a period of five years, and be available for inspection by personnel of federal, state, and local air pollution control agencies.	40 CFR Section 60.334(b)

TABLE B: SUBMITTALS

06/05/96

Facility Name: Northern Natural Gas - Faribault
Permit Number: 13100058 - 001

Table B lists the submittals you must send to the Commissioner. Table B is divided into two sections, for source-specific submittal requirements and for submittals required of all permittees. Source-specific submittals are further organized as either one-time only or recurrent requirements. You may also be subject to additional reporting requirements contained in the compliance schedule located in Table C of this permit. All submittals must be postmarked or received by the date specified in the table, and certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Submittals which must be provided on standardized forms approved by the Commissioner are noted in Tables B and C.

Send any application for a permit or permit amendment to: Permit Information Coordinator, Permit Section, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4914. Also send the Permit Information Coordinator notices of: accumulated insignificant activities, installation of control equipment, replacement of an emissions unit, and changes that contravene a permit term.

Send all other submittals to: Compliance Tracking Coordinator, Compliance Determination Unit, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

06/05/96

Facility Name: Northern Natural Gas - Faribault

Permit Number: 13100058 - 001

What to send	When to send	Portion of Facility Affected
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup	EU001
Notification of the Anticipated Date of Initial Startup	due 30 days before Anticipated Date of Initial Startup but no earlier than 60 days before anticipated initial startup	EU001
Notification of the Date Construction Began	due 30 days after Start Of Construction	EU001
Performance Test Notification (written)	due 30 days before Performance Test for NOx	SV001
Performance Test Plan	due 30 days before Performance Test for NOx	SV001
Performance Test Report - Microfiche Copy	due 105 days after Performance Test for NOx	SV001
Performance Test Report	due 45 days after Performance Test for NOx	SV001

TABLE B: RECURRENT SUBMITTALS

06/05/96

Facility Name: Northern Natural Gas - Faribault

Permit Number: 13100058 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance (due by July 30 and January 30 of each year). The report must be submitted even if there were no deviations for the reporting period. To be submitted on a form approved by the Commissioner.	Total Facility
Compliance Certification	due 30 days after end of each calendar year following Permit Issuance (by January 30th for the previous calendar year). To be submitted on a form approved by the Commissioner.	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year following Permit Issuance (April 1st). To be submitted on a form approved by the Commissioner.	Total Facility

TECHNICAL SUPPORT DOCUMENT
For Northern Natural Gas Company (624G)
DRAFT AIR EMISSION PERMIT NO. 13100058-001

This technical support document is for all the interested parties of the draft permit and to meet the requirements that have been set forth by the federal regulations and Minnesota Rules (Minn. R. pt. 7007.0850, subp. 1.) The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the draft permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Contact/Address	Stationary Source/Address (SIC Code: 4922)
Mr. John Steenberg	Northern Natural Gas Company
ENRON Operations Corporation	Faribault Compressor Station
P.O. Box 1188	Faribault, Rice County, MN
Houston, TX 77251-1188	

Owner/Address	
Mr. Phil Lowry, V.P. Operations	
Northern Natural Gas Company	
1111 South 103rd Street	
Omaha, NE 68124	

1.2. Description Of The Permit Action

Facility Description: The facility is a natural gas compressor station near Faribault, Minnesota. The station will consist of one natural gas turbine and one 300 kW emergency generator.

Permit Action: This permit is for the construction of a new facility. The facility will consist of a natural gas turbine and an emergency generator. The potential emissions from the emission units, without control, are less than the thresholds for all criteria pollutants. They are required to get a permit due to being subject to 40 CFR 60, Subp. GG.

Environmental Review is not required for the installation of the new emission units as the allowable emissions with limits are less than 100 tons per year for criteria pollutants

1.3. Emissions of the Facility

Table 1. Potential to Emit Summary and Attainment Status:

Pollutant	Potential to Emit of Entire Facility (tons per year)	Attainment or Unclassified?
Particulate Matter (PM)	19	Y
Particulate Matter less than 10 micron (PM ₁₀)	19	Y
Sulfur Dioxide (SO ₂)	8.7	Y
Nitrogen Oxides (NO _x)	46	Y
Volatile Organic Compounds (VOCs)/Ozone	16	Y
Carbon Monoxide (CO)	69	Y
Lead	0	Y
Hazardous Air Pollutants (add as needed)	-	NA

Table 2. Facility Classification

Classification (put x in appropriate box)	Major	Synthetic Minor	Minor	N/A
Prevention of Significant Deterioration			x	
Non Attainment Area (list pollutant)				x
Operating Permit Program	x			

2. Regulatory and/or Statutory Basis of Emission Limit

Summary of Emission Limit and Regulatory and/or Statutory Basis of the Emission Limit

STACK/VENT I.D.: 001 EMISSION UNIT: 001 - Gas Turbine

Emission Limit and/or Special Conditions: max. 10,600 hp

Factual and legal basis for above: Per permit application, in accordance with FERC permit

Comments: They requested this limit be the basis of their PTE calculations. The FERC permit currently requires that they meet this limit. They use a “governor” of sorts to ensure that they can not exceed 10,600 hp. The FERC permit is non-expiring; however, they may petition to have their rating changed. This process takes approximately one year. Therefore, I am requiring them to submit a modification application if they apply to have their rating increased. The turbine is not “mass-produced” as defined in 40 CFR 60, subp. GG.

STACK/VENT I.D.: 001 EMISSION UNIT: 001 - Gas Turbine

Emission Limit and/or Special Conditions: NO_x emissions shall not exceed 0.0157% by volume at 15 percent oxygen and on a dry basis

Factual and legal basis for above: 40 CFR 60, Subp. GG - Standards of Performance for Stationary Gas Turbines. 60.332(a)(2)

Comments: Stationary gas turbine (not electric utility turbine) with a manufacturer’s rated base load of 30 megawatts or less...

From AP-42, Section 3.1.1: 4021 hp is equivalent to 3 MW, therefore 10,600 hp = 7.9 MW

From Subp. GG: 100 MMBtu = 107.26 GigaJoules, therefore 103 MMBtu = 110.42 GJ.

Further, 110.42 GJ x (Watt-hr/13.73 KiloJoules) = 8.0 MW

Monitoring of fuel nitrogen content is required. They have submitted a request for a custom fuel-monitoring schedule in accordance with 60.334(b), per criteria discussed in EPA memo dated 8/14/87.

STACK/VENT I.D.: 001 EMISSION UNIT: 001 - Gas Turbine

Emission Limit and/or Special Conditions: Performance testing, NO_x in the exhaust gas will not be required per custom fuel-monitoring schedule approved by EPA.

Factual and legal basis for above: 40 CFR 60, Subp. GG - Standards of Performance for Stationary Gas Turbines. 60.335(a)

Comments: To be performed at 10,600 hp.

Mr. Bob Lindholm

Page 4

Technical Support Document

Northern Natural Gas - Faribault

page 4

STACK/VENT I.D.: 001

EMISSION UNIT: 001 - Gas Turbine

Emission Limit and/or Special Conditions: SO₂ emissions shall not exceed 0.015% by volume at 15 percent oxygen and on a dry basis. Shall not burn fuel which contains sulfur in excess of 0.8 percent by weight. Performance testing required for SO₂.

Factual and legal basis for above: 40 CFR 60, Subp. GG - Standards of Performance for Stationary Gas Turbines. 60.333

Comments: Monitoring of fuel sulfur content is required according to custom fuel-monitoring schedule per 60.334(b).

STACK/VENT I.D.: 002

EMISSION UNIT: 002 - Emergency Generator

Emission Limit and/or Special Conditions: Shall not exceed 20 percent opacity for more than ten consecutive seconds once operating temperatures have been obtained.

Factual and legal basis for above: Minn. R. 7011.2300

Comments: Performance test if requested by the Division Manager. Diesel fuel tank is about 500 gallons.

STACK/VENT I.D.: 002

EMISSION UNIT: 002 - Emergency Generator (300 kW)

Emission Limit and/or Special Conditions: Sulfur limit does not apply

Factual and legal basis for above: Minn. R. 7011.2300, subp. 2

Comments:

AP-42, App. A-14: $300 \text{ kW} \times 2.5435 \times 10^3 = 1.1 \text{ MMBtu/hr}$; Turbine = 103 MMBtu/hr
Total heat input at facility = 104 MMBtu/hr outside of metro region.

3. Conclusion

Based on the information provided by Northern Natural Gas Company, the MPCA has reasonable assurance that the proposed construction and operation of the emission facility, as described in the Air Emission Permit No. 13100058-001 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Attachments:

1. GI-07 Facility Emission Summary
2. EC forms for Calculations
3. Manufacturer's Emission Factors
4. CD forms
5. EPA approval letter of custom fuel-monitoring schedule

Need further information?

Permit Engineer: Bonnie J. Nelson
Telephone No.: 612-282-5846