



## **TABLE OF CONTENTS**

**Notice to the Permittee**

**Permit Shield**

**Facility Description**

**Amendment Description**

**Table A: Limits and Other Requirements**

**Table B: Submittals**

**Appendices: Operator Summary**

**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	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. 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. R. 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. Certain requirements which have been determined not to apply are listed in Table A of this permit.

**FACILITY DESCRIPTION:**

The facility will use a 7229 hp natural gas-fired turbine to compress natural gas in a pipeline. The facility will operate an emergency generator as a backup for electrical power. Uncontrolled emissions from the facility are less than the thresholds for all criteria pollutants. However, the natural gas-fired turbine is subject to 40 CFR pt. 60, subp. GG and the Permittee will therefore receive a state operating permit.

**AMENDMENT DESCRIPTION:**

This amendment is an MPCA initiated administrative amendment. It does not change any emissions or permit requirements. The amendment only revises how the requirements were entered into the MPCA database.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/21/00

Facility Name: Northern Natural Gas - Hugo

Permit Number: 16300110 - 002

**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
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
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
Operating and/or production limits will be placed on emission units based on operating conditions during compliance testing. Limits set as a result of a compliance test (conducted before or after permit issuance) apply until new operating/production limits are set following formal review of a performance test as specified by Minn. R. 7017.2025.	Minn. R. 7017.2025
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
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
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
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 Deviation: due 2 days after Discovery of Deviation (Discovery of Deviation Endangering Human Health or the Environment Report (written)), 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)
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
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
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

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/21/00

Facility Name: Northern Natural Gas - Hugo

Permit Number: 16300110 - 002

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)
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)
Recordkeeping: Retain all records at the Northern Natural Gas Co. North Branch Compressor Station, 6579 420th St., P.O. Box 309, North Branch, MN 55056 [telephone:612-674-4488], 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)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
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)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/21/00

Facility Name: Northern Natural Gas - Hugo

Permit Number: 16300110 - 002

**Subject Item: SV 001**

**Associated Items: EU 001 Gas Turbine Compressor**

What to do	Why to do it
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)
Performance Test: due 180 days after Initial Startup but no later than 60 days after achieving maximum production rate to determine NOx emissions per 40 CFR Section 60.332(d).	40 CFR Section 60.8(a)
<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.</p> <p>Performance Test Notification (written): due 30 days before each Performance Test                      Performance Test Plan: due 30 days before each Performance Test                      Performance Test Pre-test Meeting: due 7 days before each Performance Test                      Performance Test Report: due 45 days after each Performance Test                      Performance Test Report - Microfiche Copy: due 105 days after each Performance Test</p>	<p>Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/21/00

Facility Name: Northern Natural Gas - Hugo

Permit Number: 16300110 - 002

**Subject Item: SV 002****Associated Items:** EU 002 Back-up Generator

<b>What to do</b>	<b>Why to do it</b>
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**

06/21/00

Facility Name: Northern Natural Gas - Hugo

Permit Number: 16300110 - 002

**Subject Item: EU 001 Gas Turbine Compressor****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)
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 Section 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 Section 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 Section 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 analysis and fuel supply pertinent to the custom fuel-monitoring schedule shall be retained for a period of five (5) 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**

06/21/00

Facility Name: Northern Natural Gas - Hugo  
Permit Number: 16300110 - 002

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor  
Permit Section  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

Supervisor  
Compliance Determination Unit  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak  
Air and Radiation Branch  
EPA Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency  
Clean Air Markets Division  
1200 Pennsylvania Avenue NW (6204N)  
Washington, D.C. 20460

**TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**

06/21/00

Facility Name: Northern Natural Gas - Hugo

Permit Number: 16300110 - 002

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
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

**TABLE B: RECURRENT SUBMITTALS**

06/21/00

Facility Name: Northern Natural Gas - Hugo

Permit Number: 16300110 - 002

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
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 1). To be submitted on a form approved by the Commissioner.	Total Facility

June 21, 2000

Mr. Ronald Beidelman, Division Environmental Specialist  
Northern Natural Gas - Hugo  
1600 West 82<sup>nd</sup> Street - Suite 210  
Minneapolis, MN 55431

RE: Administrative Amendment to your Title V Permit

Dear Mr. Ronald Beidelman:

The Minnesota Pollution Control Agency (MPCA) has administratively amended your Title V Air Emission Permit. The purpose of amending your permit was to allow the MPCA to streamline the tracking of your Performance Test (PT) and/or Continuous Monitoring System (CMS) requirements.

This administrative amendment does not change your facility's permit requirements. The amendment only changes whether or not the MPCA tracks particular PT/CMS requirements in its Delta database. Prior to the permit amendment, the MPCA tracked all of your PT/CMS requirements in its database (e.g. date of test notification; date of test plan submittal; date of pre-test meeting; date of test; and date of test report submittal). The MPCA will now track fewer requirements in Delta, although all submittals and actions will still be subject to timeliness and content review. The visible effect on your permit is that certain PT and/or CMS requirements have been moved from Table B to Table A of the permit.

Please review the enclosed copy of your amended permit. If you have any questions, please contact the MPCA Customer Assistance Center at (651) 282-5844.

Sincerely,

Carolina Espejel Schutt, P.E.  
Supervisor, Sector 2  
Major Facilities Section  
Metro District

CES/HH:lao

Enclosure

cc: Robert Miller, EPA Region V (w/attachments)  
AQ File No. 624H (w/attachments)