STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

February 10, 2006

Certified Mail No. 7000 1670 0013 8129 0287

Mr. Chris Harriman
Glenns Ferry Cogeneration Partners, Ltd.
811 South Oneida
Rupert, ID 83347

RE: Facility ID No. 039-00017, Glenns Ferry Cogeneration Partners, Ltd, Glenns Ferry
Final Permit Letter

Dear Mr. Harriman:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050402 for Glenns Ferry Cogeneration Partners, Ltd, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received January 10, 2005. This permit is effective immediately and replaces PTC No. 039-00017, issued August 12, 1998. This permit does not release Glenns Ferry Cogeneration Partners, Ltd, from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Tom Krinke of the Boise Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/SC/sd
Enclosures

Permit No. P-050402

Air Quality **PERMIT TO CONSTRUCT** **State of Idaho** **Department of Environmental Quality**	**PERMIT No.:** P-050402 **FACILITY ID No.:** 039-00017 **AQCR:** 063 **CLASS:** SM **SIC:** 4911 **ZONE:** 11 **UTM COORDINATE (km):** 638.5, 4757.0

1. **PERMITTEE** Glenns Ferry Cogeneration Partners, Ltd.			
2. **PROJECT** Cogeneration Facility			
3. **MAILING ADDRESS** 811 South Oneida	**CITY** Rupert	**STATE** ID	**ZIP** 83347
4. **FACILITY CONTACT** Chris Harriman	**TITLE** Plant Manager	**TELEPHONE** (208) 436-1596	
5. **RESPONSIBLE OFFICIAL** Chris Harriman	**TITLE** Plant Manager	**TELEPHONE** (208) 436-1596	
6. **EXACT PLANT LOCATION** Glenns Ferry, Idaho, on Idaho Fresh-Pak, Inc. Property		**COUNTY** Elmore	
7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS** Power Generation - Electricity and Steam			

8. **GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: February 10, 2006

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
cf/qtr	cubic feet per calendar quarter
cf/yr	cubic feet per consecutive 12-month period
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
MMcf/qtr	million cubic feet per calendar quarter
MMcf/yr	million cubic feet per consecutive 12-month period
NO_x	nitrogen oxides
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
SO_2	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This PTC is a revision to the facility's existing permit. Emissions are not increasing. The following list identifies the changes made for this permit revision:

- Mailing address changed to 811 South Oneida, Rupert, ID 83347
- Facility contact changed to Mr. Chris Harriman, Plant Manger; 208-436-1596
- Responsible official changed to Mr. Chris Harriman, Plant Manger; 208-436-1596
- Plant name changed to Idaho Fresh-Pak, Inc., to which Glenns Ferry Cogeneration Partners, Ltd. exports waste heat
- The monitoring requirement for sulfur and nitrogen contents of the fuel revised to reflect the changes in 40 CFR 60 Subpart GG and EPA's November 11, 1996 letter to the permittee.

1.2 This PTC replaces PTC No. 039-00017, issued August 12, 1998, the terms and conditions of which shall no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Solar Mars 100 Turbine	Low NO_X combustor

2. SOLAR MARS 100 TURBINE

2.1 Process Description

A Solar Mars 100-T15000S low NO_x natural gas-fired turbine is used to drive a generator that produces electricity. The combustion turbine has maximum heat input rate of 97.66 MMBtu/hr when fired on natural gas. It has the following stack specifications:

Stack height:	60 feet
Stack exit diameter:	6 feet
Stack flow rate:	109,298 acfm
Stack exhaust gas temperature:	317°F

2.2 Emissions Control Description

NO_x and CO emissons are controlled by a Solar, SoloNO_x combustor, or equivalent.

Table 2.1 TURBINE DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Solar Mar 100-T15000S low NO_x natural gas-fired turbine	Low NO_x combustor	Turbine stack

Emissions Limits

2.3 Emissions Limits

The NO_x, SO_2, and CO emissions from the turbine stack shall not exceed any corresponding emissions rate limits listed in Permit Conditions 2.3.1, 2.3.2, and 2.3.3.

2.3.1 NO_x Emission Limits

Oxides of nitrogen (NO_x) emissions shall not exceed 0.0212% by volume of exhaust gas at 15% oxygen and on a dry basis as required in 40 CFR 60, Subpart GG, Section 60.332(a)(2), nor shall they exceed the emission rate limit listed in Table 2.2 of this permit.

2.3.2 Sulfur Dioxide Emission Limits

Sulfur dioxide (SO_2) emissions shall not exceed 0.015% by volume of exhaust gas at 15% oxygen and on a dry basis as required in 40 CFR 60.333(a), nor shall they exceed the emission rate limits listed in Table 2.2 of this permit.

2.3.3 Carbon Monoxide Emission Limits

Carbon monoxide (CO) emissions shall not exceed any corresponding emission rate limit listed in Table 2.2 of this permit.

Table 2.2 TURBINE EMISSIONS LIMITS

Source Description	SO_2		CO		NO_X	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Solar Mars 100 Turbine	0.734	3.21	11.4	49.93	17.74	77.70

2.4 Opacity Limit

Visible emissions emanating from the turbine exhaust stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60 minute period as required in IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.5 Fuel

The turbine shall be fired by natural gas exclusively.

2.6 Fuel Consumption

The maximum amount of fuel combusted in the turbine shall not exceed 231.3 million cubic feet per calendar quarter (MMcf/qtr), or 925 million cubic feet per consecutive 12-month period (MMcf/yr).

2.7 Fuel Sulfur Limit

The sulfur content of the fuel combusted in the turbine shall not exceed 0.8% by weight as required by 40 CFR 60.333(b).

2.8 SoLoNO$_x$ Combustor

The turbine used at this facility shall utilize a Solar, SoLoNO$_x$, low NO$_x$ combustor, or equivalent, to control NO$_x$ and CO emissions resulting from the combustion of natural gas in the turbine. An equivalent pollution control device may be used in place of the Solar SoLoNO$_x$ combustor so long as the manufacturer guarantees a NO$_x$ and CO destruction efficiency of at least 80%.

2.9 Operating and Maintenance Plan

The permittee shall have developed an operating and maintenance plan for the turbine and low NO$_x$ combustor used at this facility. The plan shall be based on the manufacturer's specification that will guarantee the NO$_x$ and CO emission rates listed in Table 2.2 of this permit. The plan shall be kept on-site and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.10 Fuel Consumption Monitoring

The permittee shall monitor and record the amount of natural gas combusted in the turbine on a quarterly and annual basis. The throughput shall be recorded as cubic feet per quarter (cf/qtr) and cubic feet per consecutive 12-month period (cf/yr). Records of this information shall be kept at the facility for the most recent two year period and made available to DEQ representatives upon request.

2.11 Sulfur and Nitrogen Contents of the Fuel

The permittee shall monitor the sulfur content and nitrogen content of the fuel being fired in the turbine as required in 60.334(h)(1) and 60.334(h)(2), respectively. Fuel sulfur sampling records shall be maintained onsite according to the selected option in accordance with 40 CFR 60.334(i)(2) or (3). The nitrogen sampling requirement has been waived by EPA's November 11, 1996 Letter.

2.12 Initial Performance Test

Within 60 days after achieving the maximum production rate at which the turbine will be operated, but not later than 180 days after initial start-up, the permittee shall conduct performance tests to measure emissions of NO_x and SO_2 as required by 40 CFR 60.332(a) and 40 CFR 60.333, respectively, and in accordance with the test methods and procedures used in 40 CFR 60.335. Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625. During the performance test, the amount of fuel combusted shall be recorded. The permittee conducted the initial performance test between July and September 1997. The permittee has fulfilled this permit requirement.

Reporting Requirements

2.13 Certification of Documents

All documents, including but not limited to, records, supporting information, and monitoring data submitted to DEQ shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:

   - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
   - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.

4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.

5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:

   - Initiation of Construction - Date
   - Completion/Cessation of Construction - Date
   - Actual Production Startup - Date
   - Initial Date of Achieving Maximum Production Rate - Production Rate and Date

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.