



# **Air Quality Permitting Statement of Basis**

**November 17, 2008**

**Tier I Operating Permit No. T1-2008.0164**

**Idaho Power Company  
Bennett Mountain Power Project  
Mountain Home**

**Facility ID No. 039-00025**

*Prepared by:*

Ken Hanna, Permit Writer

*KH*

**FINAL**

## Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE .....	3
1. PURPOSE .....	4
2. FACILITY DESCRIPTION .....	4
3. FACILITY/AREA CLASSIFICATION.....	4
4. APPLICATION SCOPE .....	4
5. SUMMARY OF EVENTS .....	4
6. PERMITTING HISTORY.....	4
7. PERMIT ANALYSIS.....	5
8. REGULATORY ANALYSIS .....	5
9. PERMIT ANALYSIS.....	5
10. INSIGNIFICANT ACTIVITIES.....	6
11. COMPLIANCE SCHEDULE .....	6
12. ALTERNATIVE OPERATING SCENARIOS.....	6
13. TRADING SCENARIOS.....	6
14. ACID RAIN PERMIT .....	6
15. PERMIT REVIEW .....	6
16. REGISTRATION FEES.....	7

## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
Btu	British thermal unit
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
MW	megawatt
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
TAPs	toxic air pollutants
VOC	volatile organic compound

## **1. PURPOSE**

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Idaho Power Company regarding the operation of the Bennett Mountain facility located outside of Mountain Home, in Elmore County. This information was submitted based on the requirements for a Tier I operating permit administrative amendment in accordance with IDAPA 58.01.01.381.

## **2. FACILITY DESCRIPTION**

This facility consists of a 170-megawatt (170-MW) Siemens Westinghouse Model 501F combustion turbine. Operations at the facility also require ancillary facilities (e.g., a fuel heater). The turbine is a natural gas-fired, simple-cycle unit, and is primarily operated to generate electric power to meet peak system load requirements.

## **3. FACILITY/AREA CLASSIFICATION**

For details regarding the facility/area classification, refer to the Statement of Basis for the initial Tier I Operating Permit No. T1-060006, issued on April 23, 2007. This information was not changed.

## **4. APPLICATION SCOPE**

This project is for an administrative amendment to change the name of the facility contact person listed on the front page of the permit. In addition, some other minor changes were made to update the permit text to the most current version. See Section 9 below for details.

## **5. SUMMARY OF EVENTS**

October 21, 2008      DEQ received a request for a Tier I operating permit administrative amendment from Idaho Power Company.

## **6. PERMITTING HISTORY**

The following is a chronological history of air quality permits issued to this facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

- Tier I Operating Permit No. T1-2008.0164, issued November 20, 2008 (A)
- Tier I Operating Permit No. T1-060006, issued April 23, 2007 (S)
- PTC No. P-050002, issued June 21, 2005 (A)
- PTC No. P-030060, issued March 19, 2004 (S)
- PTC No. 039-00025, issued September 9, 2002 (S)

It should be noted that PTC No. P-050002 replaced the terms and conditions of all preceding PTCs and is the only PTC in effect at the present time.

## 7. PERMIT ANALYSIS

### 7.1 *Emissions Description and Emissions Inventory*

For details regarding the facility's emissions description and emissions inventory, refer to the Statement of Basis for the initial Tier I Operating Permit No. T1-060006, issued on April 23, 2007. This information was not changed.

## 8. REGULATORY ANALYSIS

This section discusses the applicability of various regulatory provisions to the facility. For details regarding the regulatory analysis conducted for this facility, refer to the Statement of Basis for the initial Tier I Operating Permit No. T1-060006, issued on April 23, 2007. This information was not changed.

## 9. PERMIT ANALYSIS

This section describes the basis for permit conditions (PC) included within the Tier I operating permit. For details regarding the permit analysis conducted for this facility, refer to the Statement of Basis for the initial Tier I Operating Permit No. T1-060006, issued on April 23, 2007. Only minor changes were made to update the permit text to the most current version, as shown below.

### 9.1 Facility-wide PCs

The Facility-wide PCs and Tier I General Provisions were updated to the most recent version that is being used in Tier I permits. The new version expresses the most recent rules and/or the most recent presentation of the rules. PCs that were updated includes PCs 2.9, 2.11, 2.12, 2.16, and 7.21.c.

### 9.2 PC 2.6

The existing PC that specified monitoring for odor emissions was removed from the permit, and 2.6 was labeled as "reserved" to preserve the numbering sequence in the permit. Initially this condition was included to be consistent with the permit for the Evander Andrews Complex. In that permit this PC was created in response to concerns, prior to construction, from the public. Since that time, for the numerous combustion turbines operating within the state, including the newer large units installed by Idaho Power, none have been found to have odorous emissions problems. Therefore, it is no longer appropriate to include this additional monitoring and recordkeeping condition in the Bennett Mountain facility permits. Below is a copy of the existing PC 2.6 that was removed:

"The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state only), 5/1/94]"

### 9.3 PC 2.10

The PM standard for fuel burning equipment was changed to only refer to gaseous fuels. This facility does not have any fuel burning equipment that combusts liquid fuel, coal or wood products. It is important to note that internal combustion engines are not classified as "fuel burning equipment". This regulation does not apply to the internal combustion engines used at the facility.

## **10. INSIGNIFICANT ACTIVITIES**

For details regarding the insignificant activities at this facility, refer to the Statement of Basis and application for the initial Tier I Operating Permit No. T1-060006, issued on April 23, 2007. This information was not changed.

## **11. COMPLIANCE SCHEDULE**

### **11.1 *Compliance Plan***

Idaho Power Company has certified compliance with all applicable requirements and no outstanding compliance issues exist; therefore, no compliance plan is necessary.

### **11.2 *Compliance Certification***

Idaho Power Company is required to certify compliance each year for the period of January 1 to December 31, in accordance with General Provision 7.21. The facility shall submit an annual compliance certification report for each emissions unit to DEQ and EPA within 30 days of the end of the specified reporting period, in accordance with IDAPA 58.01.01.314.09. The compliance certification report shall address compliance of each emissions unit with the terms and conditions of this permit, including fuel usage, visible emissions, and fugitive emissions. This requirement did not change as part of the administrative amendment.

## **12. ALTERNATIVE OPERATING SCENARIOS**

The facility did not request any alternative operating scenarios.

## **13. TRADING SCENARIOS**

The facility did not request any trading scenarios.

## **14. ACID RAIN PERMIT**

For details regarding the permit requirements of the Title IV Acid Rain Program for this facility, refer to the Statement of Basis for the initial Tier I Operating Permit No. T1-060006, issued on April 23, 2007. This information was not changed.

## **15. PERMIT REVIEW**

### **15.1 *Facility Review of Draft Permit***

DEQ provided the draft permit and Statement of Basis to Idaho Power Company for its review on October 30, 2008. No changes were requested.

### **15.2 *Public Comment***

This action is for a Tier I administrative amendment in accordance with IDAPA 58.01.01.381.01.b. This rule specifies the following:

“An administrative permit amendment is a permit revision that:

- b. Identifies a change in the name, address, or phone number of any person identified in the Tier I operating permit, or provides a similar minor administrative change at the Tier I source.”

The requirements for providing an opportunity for comment to the public, affected states and the EPA for a Tier I Administrative Amendment are specified by IDAPA 58.01.01.381.02.c. In accordance with this rule, an opportunity for public comment was not conducted for this amended permit to change the name of the facility contact person. Following is a copy of this rule:

“The Department shall, within sixty (60) days of the receipt of a request for an administrative permit amendment, take final action on the request and may incorporate such changes without providing notice to the public or affected States provided that the Department designates any such administrative permit amendment as having been made pursuant to Section 381. The Department shall submit a copy of the revised permit, or an addendum, to the EPA and send the original to the permittee.”

## **16. REGISTRATION FEES**

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is currently in compliance with registration and registration fee requirements.

KH/hp Permit No. T1-2008.0164