

Statement of Basis

Tier I Operating Permit No. T1-2015.0040

Project ID 61572

**Northwest Pipeline LLC
Pegram Compressor Station
Pegram, Idaho**

Facility ID 007-00004

Final

February 11, 2016

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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

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1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CMS	continuous monitoring systems
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O ₂	oxygen
PC	permit condition
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTE	potential to emit

PW	process weight rate
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
ULSD	ultra low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

Northwest Pipeline LLC, Pegram Compressor Station (NWP) is a natural gas compressor station and is located at Section 14, Township 15S, Range 45E, in Bear Lake County Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit NO_x above the major source threshold of 100 tons-per-year. At the time of this permitting action the facility is not a major source of HAP emissions. As a major facility, NWP is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from NWP as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for NWP.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

NWP's Tier I operating permit is organized into sections. They are as follows:

Section 2 - Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 - Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 4 through 5 – Units 1 and 2 Natural Gas-Fired Turbines, Unit 3 Reciprocating IC Engine

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 6 - Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

Section 7 - General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

3. FACILITY INFORMATION

3.1 Facility Description

The Pegram Compressor Station operates remotely from NWP's headquarters, located in Salt Lake City, and is used to transmit natural gas along NWP's natural gas transmission pipeline. The station is operated to meet the demand of the transmission pipeline system rather than a fixed schedule. The arrangement of pipes and valves in the Pegram Compressor Station allows natural gas to be transmitted in either direction.

Natural gas entering the station passes through two in-line filters (one for each turbine) that remove any impurities from the gas stream. The natural gas is compressed through the compressor and is returned to the transmission pipeline. Fuel for the turbine and other natural gas combustion equipment enters the station in a separate pipeline. Fuel gas is lowered from the pipeline pressure to pressures appropriate for the turbines in the fuel gas building.

From the fuel gas building, natural gas is transported to the turbines, the fuel gas heater, the space heaters, and the air compressor. The turbines, fuel gas heater, and air compressor have their own exhaust stacks.

3.2 Facility Permitting History

Tier I Operating Permit History - Previous 5-year permit term June 27, 2011 to June 27, 2016

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from June 27, 2011 to June 27, 2016. 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).

June 17, 2014 T1-2011.0062, Administrative amendment to change the name of the permittee from Northwest Pipeline GP to Northwest Pipeline LLC, (A, will be S as a result of this project)

June 27, 2011 T1-2011.0062, Previous Tier I permit renewal, (S)

Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I 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).

June 17, 2014 T1-2011.0062, Administrative amendment, (A, will be S as a result of this project)

June 27, 2011 T1-2011.0062, Previous Tier I permit renewal, (S)

March 21, 2008 Tier I operating permit T1-2007.0210, Permit status (A, will be S as a result of this project)

July 31, 2006 T1-030315, Previous Tier I permit renewal (S)

December 21, 2005 PTC 007-00004 portable turbine PTC terminated (S)

August 23, 2001 PTC 007-00004 amended for a portable turbine installation (S)

January 3, 2001 The facility was issued an initial Tier I Operating Permit No. 007-00004 (S)

December 8, 1995 PTC 007-00004 amended for a horsepower increase of one turbine (A)

December 9, 1994 PTC 007-00004 was amended for an additional turbine (S)

June 17, 1991 The facility was issued PTC Number 007-00004 for an added turbine (S)

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit.

4.2 Application Chronology

August 6, 2015	DEQ received an application.
September 23, 2015	DEQ determined that the application was complete.
October 26, 2015	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 30, 2015	DEQ made available the draft permit and statement of basis for applicant review.
November 18 – December 18, 2015	DEQ provided a public comment period on the proposed action.
December 23, 2015	DEQ provided the proposed permit and statement of basis for EPA review.
February 11, 2015	DEQ issued the final permit and statement of basis.

5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

5.1 Process No. 1 – Natural Gas-Fired Turbines

Table 5.1 lists the emissions units and control devices associated with natural gas-fired turbines.

Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Unit 1	Natural gas-fired turbine, Solar T-4700	None	Unit 1 turbine exhaust stack
Unit 2	Natural gas-fired turbine, Solar T-4500	None	Unit 2 turbine exhaust stack

Two natural gas-fired turbines, Units 1 and 2 are used to power natural gas compressors at this facility. Unit 1 is a Solar Centaur turbine, model T-4700, natural gas-fired turbine rated at a maximum of 4,680 bhp. This turbine was installed at the facility in 1979. Unit 2 is a Solar Centaur turbine, model T-4500, natural gas-fired turbine rated at a maximum of 4,354 bhp. This turbine was installed at the facility in 1992.

5.2 Process No. 2 – Reciprocating IC Engine

Table 5.2 lists the emissions units and control devices associated with the reciprocating IC engine.

Table 5.2 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Unit 3	Reciprocating IC engine	None	Unit 3 air compressor exhaust stack

One backup air compressor is powered with a reciprocating IC engine, Unit 3. Unit 3 is a Wisconsin, model VE-4, natural gas-fired IC engine rated at a maximum of 15 hp. This engine was installed at the facility in 1995.

5.3 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 5.3 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

Table 5.3 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit / Activity	Regulatory Authority / Justification IDAPA citation Section 317.01
Fuel gas heater 250,000 Btu/hr of natural gas	b.i.(5)
Lubricating oil tanks Two make-up tanks at 500 gallons One used oil tank at 90 barrels	a.i.(4)
Space heaters 40 heaters totaling 1.3 MMBtu/hr of natural gas	b.i.(5)
Natural gas pipeline and fuel system	b.i.(30)

5.4 Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The findings on which this shield is based are presented below:

- Requirements for Which a Permit Shield Will Be Granted
None requested
- Requirements for Which a Permit Shield Will Not Be Granted
None requested

5.5 Emissions Inventory

Table 5.4 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of

material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Listed below Table 5.4 are the references for the emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix B of this statement of basis.

Table 5.4 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Source Description	PM ₁₀ ^a T/yr	NO _x ^b T/yr	SO ₂ ^c T/yr	CO ^d T/yr	VOC ^e T/yr	Lead ^f T/yr	HAP ^g T/yr	GHG CO _{2e} T/yr
Natural gas-fired turbine, Unit 1	1.10	98.90	4.42	13.65	0.35	0.00	0.17	17938
Natural gas-fired turbine, Unit 2	1.10	65.80	4.08	13.65	0.35	0.00	0.17	17938
Reciprocating IC engine, Unit 3	0.01	0.97	0.00	1.59	0.01	0.00	0.04	88
Total Emissions	2.21	165.67	8.50	28.89	0.71	0.00	0.39	35964

- a) PM₁₀ (including filterable and condensable) emissions are based upon AP-42 (4/2000) Table 3.1-2a for natural gas-fired turbines and upon AP-42 (7/2000) Table 3.2-3 for 4-stroke rich-burn engines.
- b) NO_x emissions are based upon the previous Tier I Operating Permit T1-2007.0210 and upon AP-42 (7/2000) Table 3.2-3 for 4-stroke rich-burn engines.
- c) SO₂ emissions are based upon the previous Tier I Operating Permit T1-2007.0210 and upon AP-42 (7/2000) Table 3.2-3 for 4-stroke rich-burn engines.
- d) CO emissions are based upon AP-42 (4/2000) Table 3.1-1 for natural gas-fired turbines and upon AP-42 (7/2000) Table 3.2-3 for 4-stroke rich-burn engines.
- e) VOC emissions are based upon AP-42 (4/2000) Table 3.1-2a for natural gas-fired turbines and upon AP-42 (7/2000) Table 3.2-3 for 4-stroke rich-burn engines.
- f) AP-42 (4/2000) Table 3.1-2a for stationary gas turbines lists no emissions factor for lead emissions from natural gas-fired turbines and Table 3.2-3 for 4-stroke rich-burn engines lists no emissions factor for lead emissions.
- g) HAP emissions are based upon AP-42 (4/2000) Table 3.1-3 for natural gas-fired stationary gas turbines and upon AP-42 (7/2000) Table 3.2-3 for 4-stroke rich-burn engines.

Listed below Table 5.5 are the references for the HAPs pollutants emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix B of this statement of basis.

Table 5.5 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Hazardous Air Pollutants	Gas-Fired Turbine Unit 1 T/yr	Gas-Fired Turbine Unit 2 T/yr	Reciprocating IC Engine Unit 3 T/yr	Total T/yr
1,1,2,2-Tetrachloroethane			1.08E-05	1.08E-05
1,1,2-Trichloroethane			6.54E-06	6.54E-06
1,1-Dichloroethane			4.83E-06	4.83E-06
1,2-Dichloroethane			4.83E-06	4.83E-06
1,2-Dichloropropane			5.56E-06	5.56E-06
1,3-Butadiene	7.16E-05	7.16E-05	2.83E-04	4.26E-04
1,3-Dichloropropene			5.43E-06	5.43E-06
Acetaldehyde	6.66E-03	6.66E-03	1.19E-03	1.45E-02
Acrolein	1.07E-03	1.07E-03	1.12E-03	3.26E-03
Benzene	2.00E-03	2.00E-03	6.75E-04	4.68E-03
Butyr/isobutyraldehyde			2.08E-05	2.08E-05
Carbon Tetrachloride			7.56E-06	7.56E-06
Chlorobenzene			5.51E-06	5.51E-06
Chloroform			5.86E-06	5.86E-06
Ethane			3.01E-02	3.01E-02
Ethylbenzene	5.33E-03	5.33E-03	1.06E-05	1.07E-02
Ethylene Dibromide			9.10E-06	9.10E-06
Formaldehyde	1.18E-01	1.18E-01	8.76E-03	2.45E-01
Methanol			1.31E-03	1.31E-03
Methylene Chloride			1.76E-05	1.76E-05

	Gas-Fired Turbine Unit 1	Gas-Fired Turbine Unit 2	Reciprocating IC Engine Unit 3	Total
Naphthalene	2.16E-04	2.16E-04	4.15E-05	4.74E-04
PAH	3.66E-04	3.66E-04	6.03E-05	7.92E-04
Propylene Oxide	4.83E-03	4.83E-03		9.66E-03
Styrene			5.09E-06	5.09E-06
Toluene	2.16E-02	2.16E-02	2.38E-04	4.34E-02
Vinyl Chloride			3.07E-06	3.07E-06
Xylenes	1.07E-02	1.07E-02	8.33E-05	2.15E-02

a) PM₁₀ (including filterable and condensable) emissions are based upon AP-42 (4/2000) Table 3.1-2a for natural gas-fired turbines and upon AP-42 (7/2000) Table 3.2-3 for 4-stroke rich-burn engines.

6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Natural gas-fired turbines, Units No. 1 and No. 2 Emissions Limits;
- Reciprocating IC Engine, Unit No. 3 Emissions Limits;
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling. In addition to the specific MRRR described under each permit condition, generally applicable facility-wide conditions and general provisions may also be required, such as monitoring, recordkeeping, performance testing, reporting, and certification requirements.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, a description of why and how the condition was changed is provided.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

6.1 Facility-Wide Conditions

Permit Condition 3.1 - Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 3.2 through 3.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 3.5 - Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 3.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

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

Permit Condition 3.7 - Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 3.8 through 3.9)

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permit Conditions 3.10 through 3.14 - Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

MRRR (Permit Conditions 3.10 through 3.14)

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;
- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ;
- Maintain records of each excess emissions event.

Permit Condition 3.15 – Fuel-Burning Equipment PM Standards

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.16 - Sulfur Content Limits

The permittee shall not sell, distribute, use, or make available for use any of the following:

- Distillate fuel oil containing more than the following percentages of sulfur:
 - ASTM Grade 1 fuel oil, 0.3% by weight.
 - ASTM Grade 2 fuel oil, 0.5% by weight.
- Coal containing greater than 1.0% sulfur by weight.
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO₂ emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 3/29/10]

MRRR - (Permit Condition 3.17)

The permittee shall maintain documentation of supplier verification of fuel sulfur content on an as received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 3.18 - Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.19 - Asbestos

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.20 - Accidental Release Prevention

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.21 - Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.22 through 3.23- NSPS/NESHAP General Provisions

This facility is subject to NSPS/NESHAP Subparts GG and ZZZZ, and is therefore required to comply with applicable General Provisions.

[40 CFR 60, Subpart A]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.24 - Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Conditions 3.25 through 3.26 - Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All 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, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

MRRR (Permit Conditions 3.27 and 3.28)

The permittee shall submit compliance test report(s) to DEQ following testing.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Permit Condition 3.29 - Reports and Certifications

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.30 - Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 4/7/11]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

6.2 Emissions Unit-Specific Emissions Limits and MRR

According to the Tier I renewal permit application no changes have occurred at the facility that would have increased the facility's emissions during the previous Tier I operating permit term. Thus, for this section of the statement of basis DEQ staff has used the same regulatory analysis from the existing previous Tier I operating permit that was issued to Northwest Pipeline LLC on June 27, 2011. There is, however, a slight change in the regulatory analysis in this statement of basis to reflect changes to DEQ's most current Tier I operating permit template and also to reflect any amendment to the applicable NSPS requirements since the issuance of the current Tier I operating permit to the facility.

Unit 1: Natural Gas-Fired Turbine

Permit Condition 4.1, NO_x Emission Limits – 40 CFR 60, Subpart GG

Emissions of NO_x from the natural gas-fired turbine, Unit 1, shall not exceed 0.0188% by volume (188 ppmv) at 15% oxygen and on a dry basis.

MRRR - (Permit Conditions 4.7 - 4.10)

The facility is required to conduct a performance test, use natural gas, and submit a source test report.

Permit Condition 4.2, NO_x Emission Limits – PTC No. 007-00004

Emissions of NO_x from the natural gas-fired turbine, Unit 1, shall not exceed any of the following emission rate limits: 22.6 pounds per hour (lb/hr); 98.9 tons per year (T/yr).

MRRR – (Permit Conditions 4.7 - 4.10)

The facility is required to calculate NO_x emissions from the natural gas-fired turbine based upon fuel use or hours of operation using the results of the required NO_x source test.

Permit Condition 4.3, SO₂ Emission Limits – PTC No. 007-00004

Emissions of SO₂ from the natural gas-fired turbine, Unit 1, shall not exceed any of the following emission rate limits: 1.00 pounds per hour (lb/hr); 4.42 tons per year (T/yr).

MRRR – (Permit Conditions 4.4, 4.5 and 4.7)

The facility is required to calculate SO₂ emissions from the natural gas-fired turbine based upon fuel use or hours of operation. The facility is also required to show compliance with fuel sulfur content standards.

Permit Condition 4.6, NO_x Test Method – 40 CFR 60.335; IDAPA 58.01.01.157

Performance tests for NO_x shall be performed according to EPA Method 20, ASTM D6522-00, or EPA Method 7E and either EPA Method 3 or 3A to determine NO_x and diluent concentration.

MRRR – (Permit Condition 4.8)

The facility is required to calculate NO_x emissions from the natural gas-fired turbine based upon fuel use or hours of operation using the results of the required NO_x source test.

Unit 2: Natural Gas-Fired Turbine

Permit Condition 5.1, NO_x Emission Limits – 40 CFR 60, Subpart GG

Emissions of NO_x from the natural gas-fired turbine, Unit 1, shall not exceed 0.0175% by volume (175 ppmv) at 15% oxygen and on a dry basis.

MRRR - (Permit Conditions 5.7 - 5.10)

The facility is required to conduct a performance test, use natural gas, and submit a source test report.

Permit Condition 5.2, NO_x Emission Limits – PTC No. 007-00004

Emissions of NO_x from the natural gas-fired turbine, Unit 1, shall not exceed any of the following emission rate limits: 18.9 pounds per hour (lb/hr); 65.8 tons per year (T/yr).

MRRR – (Permit Conditions 5.7 - 5.10)

The facility is required to calculate NO_x emissions from the natural gas-fired turbine based upon fuel use or hours of operation using the results of the required NO_x source test.

Permit Condition 4.3, SO₂ Emission Limits – PTC No. 007-00004

Emissions of SO₂ from the natural gas-fired turbine, Unit 1, shall not exceed any of the following emission rate limits: 0.93 pounds per hour (lb/hr); 4.08 tons per year (T/yr).

MRRR – (Permit Conditions 5.4, 5.5 and 5.7)

The facility is required to calculate SO₂ emissions from the natural gas-fired turbine based upon fuel use or hours of operation. The facility is also required to show compliance with fuel sulfur content standards.

Permit Condition 5.6, NO_x Test Method – 40 CFR 60.335; IDAPA 58.01.01.157

Performance tests for NO_x shall be performed according to EPA Method 20, ASTM D6522-00, or EPA Method 7E and either EPA Method 3 or 3A to determine NO_x and diluent concentration.

MRRR – (Permit Condition 5.9)

The facility is required to calculate NO_x emissions from the natural gas-fired turbine based upon fuel use or hours of operation using the results of the required NO_x source test.

Unit 3: Reciprocating IC Engine

Permit Condition 6.1, Fuel Requirements – IDAPA 58.01.01.322.01

Only pipeline quality natural gas shall be combusted in the reciprocating IC engine, Unit 3.

MRRR – (Permit Conditions 6.2, 6.7, and 6.8)

The facility is required to combust only pipeline natural gas. The facility is also required to show compliance with fuel sulfur content standards.

Permit Condition 6.4, Operating Limitations – 40 CFR 63.6603

Change oil and filter every 500 hours of operation or annually, whichever comes first in Unit 3. Inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first; and inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. This permit condition was updated based on emergency engine requirements.

MRRR – (Permit Conditions 6.7 through 6.9)

The facility is required to operate and maintain Unit 3 according to the operating limitations. The facility is required to report each instance where the requirements are not met.

Permit Condition 6.5, General Requirements – 40 CFR 63.6605

Maintain Unit 3 in a manner consistent with safety and good air pollution control practices for minimizing emissions.

MRRR – (Permit Conditions 6.7 through 6.9)

The facility is required to operate and maintain Unit 3 according to the general requirements. The facility is required to report each instance where the requirements are not met.

6.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

Inspection and Entry

Upon presentation of credentials, the facility shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

New Applicable Requirements

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
 - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.

- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

False Statements

The permittee may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

The permittee may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in Bear Lake County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

7.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

The facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for NO_x as demonstrated previously in the Emissions Inventory Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, and is subject to Tier I permitting requirements.

7.3 PSD Classification (40 CFR 52.21)

The facility is not a major facility for the purposes of the federal prevention of significant deterioration (PSD) program as referenced by IDAPA 58.01.01.205 because the facility does not emit nor has the potential to emit a regulated criteria air pollutant in amounts greater than or equal to the major threshold criteria of 250 T/yr.

7.4 NSPS Applicability (40 CFR 60)

Because the facility has lubricating oil storage tanks and natural gas compression equipment, the following NSPS requirements may apply to this facility:

- 40 CFR 60, Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
- 40 CFR 60, Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984
- 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or modification Commenced After July 23, 1984
- 40 CFR 60, Subpart KKK - Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants
- 40 CFR 60, Subpart GG – Standards of Performance for Stationary Gas Turbines
- 40 CFR 60, Subpart LLL – Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions
- 40 CFR 60, Subpart JJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Non Applicable Regulations

40 CFR 60, Subpart K

Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

§ 60.110 Applicability and designation of affected facility.

Section (c) states that the requirements of this subpart apply to petroleum storage tanks which: (1) Have a capacity greater than 151, 416 liters (40,000 gallons), but not exceeding 246,052 liters (65,000 gallons), and commences construction or modification after March 8, 1974, and prior to May 19, 1978.

The largest storage tank at this facility is 90 bbl or 3,780 gallons. As no tank at this facility has a capacity of 40,000 gallons or greater the requirements of Subpart K are not applicable to the storage tanks located at this facility.

40 CFR 60, Subpart Ka

Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

§ 60.110a Applicability and designation of affected facility.

Section (a) states that the requirements of this subpart apply to affected facilities. Which, except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a storage capacity greater than 151,416 liters (40,000 gallons) that is used to store petroleum liquids for which construction is commenced after May 18, 1978.

Section (b) states that each petroleum liquid storage vessel with a capacity of less than 1,589,873 liters (420,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer is not an affected facility and, therefore, is exempt from the requirements of this subpart.

As stated previously, the largest storage tank located at this facility has a capacity of 90 bbl (3,780 gal) and is not located at a petroleum production facility where there would be a “custody transfer.” As no tank at this facility has a capacity of 40,000 gal or greater and the facility is not a petroleum production facility, the requirements of Subpart Ka are not applicable to the storage tanks located at this facility.

40 CFR 60, Subpart Kb

Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or modification Commenced After July 23, 1984

§ 60.110b Applicability and designation of affected facility.

Section (a) states that the requirements of this subpart apply to affected facilities. Which, except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (19,812 gal) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

Section (b) states that this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ (39,890 gal) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

As stated previously the largest storage tank located at this facility has a capacity of 90 bbl (3,780 gal). As no tank at this facility has a capacity of 19,812 gal or greater, the requirements of Subpart Kb are not applicable to the storage tanks located at this facility.

40 CFR 60, Subpart KKK

Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants

§ 60.630 Applicability and designation of affected facility.

Section (a)(1) states that the requirements of this subpart apply to affected facilities in onshore natural gas processing plants.

§ 60.631 Definitions

Natural gas processing plant (gas plant) means any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both.

This facility is a natural gas compressor station and does not meet the definition of a “Natural gas processing plant.” Therefore, this facility is not subject to the requirements of Subpart KKK.

40 CFR 60, Subpart LLL Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions

§ 60.640 Applicability and designation of affected facility.

Section (a) states that the requirements of this subpart apply to the following affected facilities that process natural gas: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit.

This facility does not operate natural gas sweetening units or sulfur recovery units. Therefore, this facility is not subject to the requirement of Subpart LLL.

40 CFR 60, Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

§ 60.4230 Am I subject to this subpart?

Section (a) states that the provisions of this subpart apply to manufacturers, and owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

This facility is not a manufacturer of SI ICE. Therefore, the sections of this subpart that apply to stationary SI ICE manufacturers do not apply.

Section (4) specifies that owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:

On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 hp (except lean burn engines with a maximum engine power greater than or equal to 500 hp and less than 1,350 hp);

On or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 hp and less than 1,350 hp;

On or after July 1, 2008, for engines with a maximum engine power less than 500 hp, or

On or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 KW (25 hp).

Section (5) specifies that for owners and operators of stationary SI ICE that commence modification or reconstruction after June 12, 2006 the requirements of this subpart apply.

This facility has one 15 hp four stroke rich burn air compressor with a reciprocating IC engine that was manufactured prior to July 1, 2008. Therefore, the air compressor located at this facility is not subject to the requirements of Subpart JJJJ.

Applicable Regulations

40 CFR 60, Subpart GG Standards of Performance for Stationary Gas Turbines

§ 60.330 Applicability and designation of affected facility.

Section (a) states that the requirements of this subpart apply to affected facilities with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired.

Section (b) states that any facility which commences construction, modification, or reconstruction after October 3, 1977, is subject to the requirements.

§ 60.331 Definitions

(a) Stationary gas turbine means any simple cycle gas turbine, regenerative cycle gas turbine or any gas turbine portion of a combined cycle steam/electric generating system that is not self propelled. It may, however, be mounted on a vehicle for portability.

This facility has two stationary gas-fired turbines, units 1 and 2, that have a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour. Therefore, this facility is subject to the requirements of Subpart GG.

§ 60.332 Standard for Nitrogen Oxide

(a) On and after the date on which the performance test required by §60.8 is completed, every owner or operator subject to the provisions of this subpart as specified in paragraphs (b), (c), and (d) of this section shall comply with one of the following, except as provided in paragraphs (e), (f), (g), (h), (i), (j), (k), and (l) of this section.

(c) Stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 million Btu/hour) but less than or equal to 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired, shall comply with the provisions of paragraph (a)(2) of this section. Per the applicant, the approximate heat input of the two gas-fired turbines, Units 1 and 2, at this facility are 38.0 MMBtu/hr.

(a)(2) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0150 \times (14.4 \div Y) + F$$

Where:

STD = allowable ISO corrected (if required as given in §60.335(b)(1)) NO_x emission concentration (percent by volume at 15 percent oxygen and on a dry basis),

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour, and

F = NO_x emission allowance for fuel-bound nitrogen as defined in paragraph (a)(4) of this section. For this project per the Applicant, F was assumed to 0% for both gas-fired turbines.

With the following conversions:

$$1 \text{ Btu} = 1.055 \text{ kJ}$$

$$1 \text{ hp} = 745.699 \text{ W}$$

Calculated NO_x emissions limit for Unit 1:

$$STD = 0.0150 \times (14.4 \div Y)$$

$$STD = 0.0150 \times [14.4 \div (8,120 \text{ Btu/hp-hr} \times 1.055 \text{ kJ/Btu} \div 745.699 \text{ W/hp})]$$

$$STD = 0.0188\% @ 15\% \text{ O}_2$$

This requirement is assured by Permit Condition 4.1.

Calculated NO_x emissions limit for the Unit 2:

$$STD = 0.0150 \times (14.4 \div Y)$$

$$STD = 0.0150 \times [14.4 \div (8,728 \text{ Btu/hp-hr} \times 1.055 \text{ kJ/Btu} \div 745.699 \text{ W/hp})]$$

$$STD = 0.0175\% @ 15\% \text{ O}_2$$

This requirement is assured by Permit Condition 5.1.

§ 60.333 Standard for Sulfur Dioxide

On and after the date on which the performance test required to be conducted by §60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with one or the other of the following conditions:

(a) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.

(b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8,000 ppmw).

This requirement is assured by 40 CFR 60.334(h)(3)(i) or Permit Conditions 4.9 and 5.9.

§ 60.334 Monitoring of Operations

NO_x Emissions Monitoring:

Section (a) states that except as provided in paragraph (b) of this section, the owner or operator of any stationary gas turbine subject to the provisions of this subpart and using water or steam injection to control NO_x emissions shall install, calibrate, maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water or steam to fuel being fired in the turbine.

Section (c) goes on to state that for any turbine that commenced construction, reconstruction or modification after October 3, 1977, but before July 8, 2004, and which does not use steam or water injection to control NO_x emissions, the owner or operator may, but is not required to, for purposes of determining excess emissions, use a CEMS that meets the requirements of paragraph (b) of this section. Also, if the owner or operator has previously submitted and received EPA, State, or local permitting authority approval of a procedure for monitoring compliance with the applicable NO_x emission limit under §60.332, that approved procedure may continue to be used.

The two gas-fired turbines located at this facility do not use water or steam injection to control NO_x emissions. Therefore, this facility does not have to use CEMS to monitor NO_x emissions from the two gas-fired turbines involved with this project.

SO_x Emissions Monitoring:

Section (h) states that the owner or operator of any stationary gas turbine subject to the provisions of this subpart: (1) Shall monitor the total sulfur content of the fuel being fired in the turbine, except as provided in paragraph (h)(3) of this section. The sulfur content of the fuel must be determined using total sulfur methods described in §60.335(b)(10). Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4000 ppmw), ASTM D4084–82, 94, D5504–01, D6228–98, or Gas Processors Association Standard 2377–86 (all of which are incorporated by reference-see §60.17), which measure the major sulfur compounds may be used.

(3) Notwithstanding the provisions of paragraph (h)(1) of this section, the owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u), regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring. The owner or operator shall use one of the following sources of information to make the required demonstration:

(i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or

This requirement is assured by Permit Conditions 4.9 and 5.9.

§ 60.335 Test Methods and Procedures

Section (a) states that the owner or operator shall conduct the performance tests required in §60.8, using either:

- (1) EPA Method 20,
- (2) ASTM D6522-00 (incorporated by reference, see §60.17), or
- (3) EPA Method 7E and either EPA Method 3 or 3A in appendix A to this part, to determine NO_x and diluent concentration.

This requirement is assured by Permit Conditions 4.6 and 5.6.

DEQ is the administrator for this subpart because the subpart is delegated to Idaho.

7.5 NESHAP Applicability (40 CFR 61)

The facility is not subject to requirements in 40 CFR 61, and this permitting action does not trigger any new 40 CFR 61 requirements.

7.6 MACT Applicability (40 CFR 63)

Because the facility has lubricating oil storage tanks, two natural gas-fired turbines, and one reciprocating IC engine, the following NESHAP requirements may apply to this facility:

- 40 CFR 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities
- 40 CFR 63, Subpart OO - National Emission Standards for Tanks - Level 1
- 40 CFR 63, Subpart WW - National Emission Standards for Storage Vessels (Tanks) - Control Level 2
- 40 CFR 63, Subpart HHH - National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities
- 40 CFR 63, Subpart YYYY - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines
- 40 CFR 63, Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The applicability determinations of the above regulations are made below.

Non Applicable Regulations

40 CFR 63, Subpart HH

National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities

§ 63.760 Applicability and designation of affected source

The provisions of this subpart apply to oil and natural gas production facilities that are major and area sources of HAPs. A major source is defined as a stationary source that emits or has the potential to emit 10 T/yr of any single HAP or 25 T/yr of total HAPs, and an area source is any stationary source of HAPs that is not a major source [40 CFR 63.2]. For facilities that are major HAP sources, this subpart applies to facilities that process, upgrade or store hydrocarbon liquids prior to the point of custody transfer or facilities that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user.

The affected sources for major sources of HAPs include the following:

- Each glycol dehydration unit;
- Each storage vessel with the potential for flash emissions;

- Compressors or ancillary equipment operating in volatile hazardous air pollutant service located at natural gas processing plants;

The affected sources for area sources of HAPs include the following:

- Each triethylene glycol (TEG) dehydration unit located at an oil and natural gas production facility.

This facility is a natural gas transmission compressor station and is not a major source of HAPs. The facility is not a natural gas production facility, there are no glycol dehydration units, and there are no ancillary equipment operating in volatile hazardous air pollutant service. Therefore, the facility is not subject to the requirement of Subpart HH.

40 CFR 63, Subpart OO

National Emission Standards for Tanks - Level 1

§ 63.900 Applicability

The provisions of this subpart apply to the control of air emissions from tanks for which another subpart of 40 CFR parts 60, 61, or 63 references the use of this subpart for such air emission control. These air emission standards for tanks are placed here for administrative convenience and only apply to those owners and operators of facilities subject to the other subparts that reference this subpart. The provisions of 40 CFR part 63, subpart A—General Provisions do not apply to this subpart except as noted in the subpart that references this subpart.

As discussed previously in Section 7.4 – NSPS Applicability and Section 7.5 – NESHAP Applicability, there are no subparts that apply to the lubricating oil storage tanks located at this facility. Therefore, the tanks located at this facility are not subject to the requirements of Subpart OO.

40 CFR 63, Subpart WW

National Emission Standards for Storage Vessels (Tanks) - Control Level 2

§ 63.1060 Applicability

The provisions of this subpart apply to the control of air emissions from storage vessels for which another subpart references the use of this subpart for such air emission control. These air emission standards for storage vessels are placed here for administrative convenience and only apply to those owners and operators of facilities subject to a referencing subpart. The provisions of subpart A (General Provisions) of this part do not apply to this subpart except as noted in the referencing subpart.

As discussed previously in Section 7.4 – NSPS Applicability and Section 7.5 – NESHAP Applicability, there are no subparts that apply to the lubricating oil storage tanks located at this facility. Therefore, the tanks located at this facility are not subject to the requirements of Subpart WW.

40 CFR 63, Subpart HHH

National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities

§ 63.1270 Applicability and designation of affected source

The provisions of this subpart apply to owners and operator of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAPs) emissions.

This facility is a natural gas transmission compressor station and is not a major source of HAPs emissions. Therefore, the facility is not subject to Subpart HHH.

40 CFR 63, Subpart YYYY

National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines

§ 63.6085 Am I subject to this subpart?

The provisions of this subpart apply to owners and operator of stationary combustion turbines located at a major source of HAP emissions.

This facility does operate two stationary combustion turbines, Units 1 and 2, but is not a major source of HAPs emissions. Therefore, the facility is not subject to Subpart YYYY.

Applicable Regulations

40 CFR 63, Subpart ZZZZ

National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

§ 63.6580 What is the purpose of subpart ZZZZ?

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. As demonstrated previously in the Emissions Inventories Section of this analysis this facility is not a major source for HAPs but is considered an area source for HAPs. Therefore, the air compressor at this facility is subject to the requirements of Subpart ZZZZ.

§ 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

Section (a) defines an affected source as any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

Sections (1)(i) through (1)(iv) defines existing stationary RICE as the following:

For stationary RICE with a site rating of more than 500 brake horsepower (bhp) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.

For stationary RICE with a site rating of less than or equal to 500 brake bhp located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

Sections (2)(i) through (2)(iii) defines new stationary RICE as the following:

A stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.

A stationary RICE with a site rating of equal to or less than 500 bhp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

Section (3)(i) through (2)(iii) defines reconstructed stationary RICE as the following:

A stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after December 19, 2002.

A stationary RICE with a site rating of equal to or less than 500 bhp located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

A stationary RICE located at an area source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

Section (b) specifies which stationary RICE are subject to limited requirements of this subpart. An affected source which meets either of the criteria in paragraphs (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f). The requirements of (b)(1)(i) through (ii) are as follows:

The stationary RICE is a new or reconstructed emergency stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions.

The stationary RICE is a new or reconstructed limited use stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions.

Section (2) specifies that a new or reconstructed stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis must meet the initial notification requirements of §63.6645(f) and the requirements of §§63.6625(c), 63.6650(g), and 63.6655(c). These stationary RICE do not have to meet the emission limitations and operating limitations of this subpart.

Section (3) allows that the following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

Existing spark ignition 2-stroke lean-burn (2SLB) stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;

Existing spark ignition 4-stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;

Existing emergency stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;

Existing limited use stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;

Existing stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions that combusts landfill gas or digester gas equivalent to 10% or more of the gross heat input on an annual basis;

Existing residential emergency stationary RICE located at an area source of HAP emissions;

Existing commercial emergency stationary RICE located at an area source of HAP emissions; or

Existing institutional emergency stationary RICE located at an area source of HAP emissions.

§ 63.6595 When do I have to comply with this subpart?

Section (a)(1) defines the timelines for complying with Subpart ZZZZ.

If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007.

If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013.

If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

§ 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart.

Section (a) specifies the emission and operating limitations of this subpart.

If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart which apply to you. Unit 3 is an emergency 4 stroke rich burn RICE with less than 500 hp.

Table 7.1 - Table 2d to Subpart ZZZZ of Part 63 — Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

For Each	You Must Meet the Following Operating Limitation
5. Emergency stationary SI RICE	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹ b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

¹ Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

§ 63.6605 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.

(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

§ 63.6645 What notifications must I submit and when?

Section (a) specifies which stationary RICE are subject to the requirements of this subpart.

An existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

An existing stationary RICE located at an area source of HAP emissions.

A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

A new or reconstructed 4SLB stationary RICE with a site rating of greater than or equal to 250 HP located at a major source of HAP emissions.

This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.

§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(j) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in items 5, 6, 7, 9, or 11 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

The Applicant has not proposed an oil analysis program in the application but has the option to do so in a maintenance plan for the engine.

§ 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

(a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

(b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test

to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

(e) You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.

(f) If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

§ 63.6655 What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).

(2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

§ 63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

§ 63.6665 What parts of the General Provisions apply to me?

Table 8 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with any of the requirements of the General Provisions specified in Table 8: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing stationary RICE that combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, an existing emergency stationary RICE, or an existing limited use stationary RICE. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in the General Provisions specified in Table 8 except for the initial notification requirements: A new stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new emergency stationary RICE, or a new limited use stationary RICE.

7.7 CAM Applicability (40 CFR 64)

40 CFR Part 64 requires CAM for units that meet the following three criteria:

- 1) The unit must have an emission limit for the pollutant;
- 2) The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

At this facility there are three units subject to Tier I permit requirements at this facility, the two natural gas-fired turbines and the reciprocating IC engine. Units 1 and 2 do have an explicit NO_x and SO₂ emissions limit stated in the permit. However, Units 1 and 2 do not have any “add-on” controls for NO_x and SO₂ emissions. In accordance with 40 CFR §64.1, the use of natural gas is not defined as a control device. Therefore, CAM (Subpart 64) does not apply to this facility.

7.8 Acid Rain Permit (40 CFR 72-75)

The facility is not an affected source subject to the Acid Rain Permit program in 40 CFR 72-75.

8. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from November 18, 2015 to December 18, 2015. During this time, comments were not submitted in response to DEQ's proposed action.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on December 23, 2015 via e-mail. After 45 days, EPA did not respond and DEQ is free to issue the permit.

Appendix A - Emissions Inventory

Solar Centaur model T-4700 Turbine, Unit 1 PTE Emissions Calculations:

For the Solar Centaur model T-4700 natural gas-fired turbine, the Applicant has supplied the heat input value as 38 MMBtu/hr.

Table B.1 NATURAL GAS-FIRED TURBINE UNIT 1 HOURLY AND ANNUAL PTE FOR CRITERIA POLLUTANTS

Emissions Unit	Rated Heat Input (MMBtu/hr)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant	Emissions Factors (lb/MMBtu)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 1	38	8,760	PM ^a	0.0066	0.25	1.10
			SO ₂ ^b	0.027	1.009	4.42
			NO _x ^b	0.594	22.58	98.90
			CO ^c	0.082	3.12	13.65
			VOC ^a	0.0021	0.08	0.35

- a) Based upon AP-42 (4/2000) Table 3.1-2a for natural gas-fired turbines.
- b) Based upon the previous Tier I Operating Permit T1-2007.0210.
- c) Based upon AP-42 (4/2000) Table 3.1-1 for natural gas-fired turbines.

Table B.2 NATURAL GAS-FIRED TURBINE UNIT 1 HOURLY AND ANNUAL PTE FOR HAPs POLLUTANTS

Emissions Unit	Rated Heat Input (MMBtu/hr)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant ^a	Emissions Factors (lb/MMBtu)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 1	38	8,760	1,3-Butadiene	4.3E-07	0.00002	0.00007
			Acetaldehyde	4.0E-05	0.00152	0.00666
			Acrolein	6.4E-06	0.00024	0.00107
			Benzene	1.2E-05	0.00046	0.00200
			Ethylbenzene	3.2E-05	0.00122	0.00533
			Formaldehyde	7.1E-04	0.02698	0.11817
			Naphthalene	1.3E-06	0.00005	0.00022
			PAH	2.2E-06	0.00008	0.00037
			Propylene Oxide	2.9E-05	0.00110	0.00483
			Toluene	1.3E-04	0.00494	0.02164
Xylenes	6.4E-05	0.00243	0.01065			

- a) Based upon AP-42 (4/2000) Table 3.1-3 for natural gas-fired stationary gas turbines.

Solar Centaur model T-4700 Turbine, Unit 2 PTE Emissions Calculations:

For the Solar Centaur model T-4500 natural gas-fired turbine, the Applicant has supplied the heat input value as 38 MMBtu/hr.

Table B.3 NATURAL GAS-FIRED TURBINE UNIT 2 HOURLY AND ANNUAL PTE FOR CRITERIA POLLUTANTS

Emissions Unit	Rated Heat Input (MMBtu/hr)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant	Emissions Factors (lb/MMBtu)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 2	38	8,760	PM ^a	0.0066	0.25	1.10
			SO ₂ ^b	0.025	0.93	4.08
			NO _x ^b	0.395	15.02	65.8
			CO ^c	0.082	3.12	13.65
			VOC ^a	0.0021	0.08	0.35

- a) Based upon AP-42 (4/2000) Table 3.1-2a for natural gas-fired turbines.
- b) Based upon the previous Tier I Operating Permit T1-2007.0210.
- c) Based upon AP-42 (4/2000) Table 3.1-1 for natural gas-fired turbines.

Table B.4 NATURAL GAS-FIRED TURBINE UNIT 2 HOURLY AND ANNUAL PTE FOR HAPs POLLUTANTS

Emissions Unit	Rated Heat Input (MMBtu/hr)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant ^a	Emissions Factors (lb/MMBtu)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 2	38	8,760	1,3-Butadiene	4.3E-07	0.00002	0.00007
			Acetaldehyde	4.0E-05	0.00152	0.00666
			Acrolein	6.4E-06	0.00024	0.00107
			Benzene	1.2E-05	0.00046	0.00200
			Ethylbenzene	3.2E-05	0.00122	0.00533
			Formaldehyde	7.1E-04	0.02698	0.11817
			Naphthalene	1.3E-06	0.00005	0.00022
			PAH	2.2E-06	0.00008	0.00037
			Propylene Oxide	2.9E-05	0.00110	0.00483
			Toluene	1.3E-04	0.00494	0.02164
			Xylenes	6.4E-05	0.00243	0.01065

- a) Based upon AP-42 (4/2000) Table 3.1-3 for natural gas-fired stationary gas turbines.

Wisconsin model VE-4 Reciprocating IC Engine, Unit 3 PTE Emissions Calculations:

For the 15 hp Wisconsin model VE-4 reciprocating IC engine, a potential heat rate of 6505 Btu/hp-hr was used.

Table B.5 NATURAL GAS-FIRED TURBINE UNIT 3 HOURLY AND ANNUAL PTE FOR CRITERIA POLLUTANTS

Emissions Unit	Rated Heat Input (Btu/hp-hr)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant ^a	Emissions Factors (lb/MMBtu)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 3	6505	8,760	PM	0.01941	0.002	0.008
			SO ₂	0.000588	0.000	0.000
			NO _x	2.27	0.221	0.970
			CO	3.72	0.363	1.590
			VOC	0.0296	0.003	0.013

^{a)} Based upon AP-42 (7/2000) Table 3.2-3 for four stroke rich-burn engines.

Table B.6 NATURAL GAS-FIRED TURBINE UNIT 3 HOURLY AND ANNUAL PTE FOR HAPs POLLUTANTS

Emissions Unit	Rated Heat Input (Btu/hp-hr)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant ^a	Emissions Factors (lb/MMBtu)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 3	6505	8,760	1,1,2,2-Tetrachloroethane	2.53E-05	2.47E-06	1.08E-05
			1,1,2-Trichloroethane	1.53E-05	1.49E-06	6.54E-06
			1,1-Dichloroethane	1.13E-05	1.10E-06	4.83E-06
			1,2-Dichloroethane	1.13E-05	1.10E-06	4.83E-06
			1,2-Dichloropropane	1.30E-05	1.27E-06	5.56E-06
			1,3-Butadiene	6.63E-04	6.47E-05	2.83E-04
			1,3-Dichloropropene	1.27E-05	1.24E-06	5.43E-06
			Acetaldehyde	2.79E-03	2.72E-04	1.19E-03
			Acrolein	2.63E-03	2.57E-04	1.12E-03
			Benzene	1.58E-03	1.54E-04	6.75E-04
			Butyr/isobutyraldehyde	4.86E-05	4.74E-06	2.08E-05
			Carbon Tetrachloride	1.77E-05	1.73E-06	7.56E-06
			Chlorobenzene	1.29E-05	1.26E-06	5.51E-06
			Ethane	1.37E-05	1.34E-06	5.86E-06
			Ethylbenzene	7.04E-02	6.87E-03	3.01E-02
			Ethylene Dibromide	2.48E-05	2.42E-06	1.06E-05
			Formaldehyde	2.13E-05	2.08E-06	9.10E-06
			Methanol	2.05E-02	2.00E-03	8.76E-03
			Naphthalene	3.06E-03	2.99E-04	1.31E-03
			PAH	4.12E-05	4.02E-06	1.76E-05
Styrene	9.71E-05	9.47E-06	4.15E-05			
Toluene	1.41E-04	1.38E-05	6.03E-05			
Vinyl Chloride	1.19E-05	1.16E-06	5.09E-06			
Xylenes	5.58E-04	5.44E-05	2.38E-04			

^{a)} Based upon AP-42 (7/2000) Table 3.2-3 for four stroke rich-burn engines.

Green House Gas (GHG) Calculations:

For both the Solar Centaur model T-4700 natural gas-fired turbine and the Solar Centaur model T-4500, the Applicant has supplied the heat input value as 38 MMBtu/hr. The aggregate maximum rated heat input capacity is 76 MMBtu/hr. The fuel characteristics have also been supplied by the Applicant.

Table B.7 NATURAL GAS-FIRED TURBINES UNITS 1 AND 2 ANNUAL PTE OF MT CO_{2e}

Source	Hours of Operation (hrs/yr)	Rated Heat Input (MMBtu/hr)	Fuel		CO ₂	CH ₄		N ₂ O		Total
			Volume (MMscf/yr)	HHV (Btu/scf)	MT CO _{2e}	MT	MT CO _{2e}	MT	MT CO _{2e}	MT CO _{2e}
Unit 1	8760	38	325	1040	17920.76	0.338	7.10	0.034	10.48	17938.34
Unit 2	8760	38	325	1040	17920.76	0.338	7.10	0.034	10.48	17938.34
Unit 3	8760	0.19	1.59	1040	87.67	.002	0.03	0.000	0.05	87.76
Facility-wide MT CO _{2e}										35964.43

Appendix B - Facility Comments for Draft Permit

The following comments were received from the facility on November 6, 2015:

Facility Comment: Table 7.1 Insignificant activities page 26 - There is no longer a combustion toilet at the facility. That reference can be removed from the permit.

DEQ Response: The combustion toilet has been removed from the permit as requested.