



STATE OF IDAHO  
DIVISION OF  
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway • Coeur d'Alene, Idaho 83814-2648 • (208) 769-1422

Dirk Kempthorne, Governor  
C. Stephen Allred, Administrator

June 14, 2000

**CERTIFIED MAIL # Z 440 612 735**

A. J. Cherian  
Environmental Engineer  
PG&E Gas Transmission-Northwest  
2100 S.W. River Parkway  
Portland, OR 97201

RE: P-000108, PG&E Gas Transmission - Northwest, Athol  
(Permit to Construct Amendment, PTC No. 055-00033)

Dear Mr. Cherian:

On July 31, 1998, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ), requested in writing that PG&E Gas Transmission - Northwest (PG&E GT-NW) update their Title V Operating Permit (OP) applications due to changes in the *Rules* that may have affected PG&E GT-NW's Compressor Station #5 located near Athol, Idaho. The request also asked that the OP application be updated by addressing all PTC's issued since submittal of the 1995 OP application. On August 31, 1998, PG&E GT-NW submitted the requested updates. Based upon review of the submitted materials and all applicable state and federal rules and regulations, DEQ finds that this project meets the provisions of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*). Enclosed is amended Permit to Construct #055-00033 which replaces Permit to Construct #055-00033 dated February 21, 1997.

This permit does not release the Permittee from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances.

You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Tom Harman of the Coeur d'Alene Regional Office will contact you regarding this meeting. DEQ strongly recommends that, in addition to your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions be present during the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street, Tenth Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program Office to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

A.J. Cherian  
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If you have any questions regarding the terms or conditions of the enclosed permit, please contact Tom Harman, Air Quality Science Officer, at (208) 769-1422.

Sincerely,

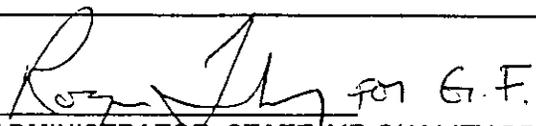
A handwritten signature in black ink, appearing to read "Gwen P. Fransen" with a stylized flourish at the end.

Gwen P. Fransen  
Regional Administrator

BR/hs TH/vh 81508 J:\XFER\AIR\_PERM\CRO\PTC\PG&E\ATHOL\000108.PL

Enclosures

cc: DEQ State Office  
Coeur d'Alene Regional Office  
EPA Region X

<b>STATE OF IDAHO</b>  <b>PERMIT TO CONSTRUCT AN AIR POLLUTION EMITTING SOURCE</b>		<b>PERMIT NUMBER</b>								
		0	5	5	-	0	0	0	3	3
		<b>AQCR</b>		<b>CLASS</b>		<b>SIC</b>				
		0	6	2	A	1	4	9	2	2
<b>ZONE</b>		<b>UTM COORDINATE (km)</b>								
1	1	5	1	9	0	5	3	0	8	8
1. <b>PERMITTEE</b>										
PG&E Gas Transmission - Northwest										
2. <b>PROJECT</b>										
Unit 5C - Compressor Station No. 5										
3. <b>MAILING ADDRESS</b>				<b>CITY</b>			<b>STATE</b>		<b>ZIP CODE</b>	
2100 Southwest River Parkway				Portland			Oregon		97201	
4. <b>SITE LOCATION COUNTY</b>			<b>NO. OF FULL-TIME EMPLOYEES</b>			<b>PROPERTY AREA AT SITE (Acreage)</b>				
Kootenia			18			18				
5. <b>PERSON TO CONTACT</b>				<b>TITLE</b>			<b>TELEPHONE</b>			
A.J. Cherian				Environmental Engineer			(503) 833-4708			
6. <b>EXACT PLANT LOCATION</b>										
½ mile off Clagstone Road, between Remington and Brunner Roads (approx. 2 ½ miles SW Athol, Idaho)										
7. <b>GENERAL NATURE OF BUSINESS &amp; KINDS OF PRODUCTS</b>										
Natural Gas Pipeline Compressor Station										
8. <b>GENERAL CONDITIONS</b>										
<p>This permit is issued according to the <i>Rules for the Control of Air Pollution in Idaho</i>, Section 16.01.01.200, and pertains only to emissions of air contaminants that are regulated by the State of Idaho and to the sources specifically allowed to be constructed by this permit.</p> <p>This permit (a) does not affect the title of the premises upon which the equipment is to be located, (b) does not release the Permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment, (c) does not release the Permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances, (d) in no manner implies or suggests that the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) or its officers, agents, or employees, assumes any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.</p> <p>This permit is not transferable to another person, place, piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.</p> <p>This permit has been granted on the basis of design information presented with its application. Changes of design or equipment that result in any change in the nature or amount of emissions must be approved in advance by DEQ unless exempted by the <i>Rules for the Control of Air Pollution in Idaho</i> Sections 220 through 223.</p>										
 <b>ADMINISTRATOR, STATE AIR QUALITY PROGRAM</b> <b>DIVISION OF ENVIRONMENTAL QUALITY</b>						<b>DATE: June 14, 2000</b>				

**PERMIT TO CONSTRUCT  
PERMITTEE, PROJECT, AND LOCATION**

PG&E Gas Transmission Northwest  
Natural Gas-Fired Turbines  
Athol, Idaho

**PERMIT NUMBER**

0 5 5 - 0 0 0 3 3

**SOURCE**

Unit 5C Gas Turbine

1. EMISSION LIMITS

1.1 NO<sub>x</sub> Emissions - Unit 5C

Oxides of nitrogen (NO<sub>x</sub>) emissions from Unit 5C equipped with a dry low emissions (DLE) combustor shall not exceed forty-two parts per million by volume (42 ppmvd), corrected to 15% oxygen and on a dry basis, annual average; nor shall NO<sub>x</sub> emissions exceed one hundred ninety-seven tons per any consecutive twelve-month period (197 T/yr).

1.2 Visible Emissions

Visible emissions from the gas turbine stacks shall not exceed 20% opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period in accordance with IDAPA 16.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined using the Department's "Procedures Manual for Air Pollution Control."

2. OPERATING REQUIREMENTS

2.1 Fuel Sulfur Content

No fuel containing sulfur in excess of 0.8 percent by weight shall be burned in the gas turbine in accordance with 40 CFR 60.333(b).

2.2 Fuel Type

The turbine shall be fired by natural gas exclusively.

2.3 Fuel Throughput

The maximum amount of natural gas combusted in Unit 5C shall not exceed two billion, six hundred twenty-seven million standard cubic feet per any consecutive 12-month period (2,627,000,000 scf/yr).

3. MONITORING REQUIREMENTS

3.1 NO<sub>x</sub> and SO<sub>2</sub> Performance Test

Within sixty (60) days after achieving maximum production rate, but not later than one hundred eighty (180) days after initial start-up, the Permittee shall conduct a performance test to measure NO<sub>x</sub> and SO<sub>2</sub> emissions from the Unit 5C gas turbine exhaust stacks as required in 40 CFR 60.332 and .333.b, and in accordance with the test methods and procedures in 40 CFR 60.335 and the DEQ's "Procedures Manual for Air Pollution Control." During the performance test, the amount of natural gas combusted shall be recorded.

**DATE: June 14, 2000**

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**PERMIT NUMBER**

0 5 5 - 0 0 0 3 3

**SOURCE**

Unit 5C Gas Turbine

3.2 Fuel Throughput

The Permittee shall monitor and record the amount of natural gas combusted in Unit 5C on a monthly and annually basis. The quantity of natural gas combusted shall be recorded as standard cubic feet and kept in a log at the facility for the most recent two (2) year period. The log shall be available to DEQ representatives upon request.

3.3 Fuel Sulfur Content

The Permittee shall monitor and record the sulfur content of the fuel being fired in the gas turbines in accordance with the approved custom fuel monitoring schedule granted to the Permittee by the Environmental Protection Agency (EPA). A copy of the semi-annual report required by EPA shall also be sent to DEQ to demonstrate compliance with 40 CFR 60.333(b) and Section 2.1 of this permit.

4. REPORTING REQUIREMENTS

4.1 Performance Test Protocol

Prior to conducting any emission test, the Permittee is strongly encouraged to submit in writing to DEQ, at least thirty (30) days in advance, a performance test protocol in accordance with IDAPA 16.01.01.157.01.a.

4.2 Performance Test Report

In accordance with IDAPA 16.01.01.157.04, the Permittee shall submit a written report of the performance test results to DEQ within thirty (30) days of completion of the test.

4.3 Excess NO<sub>x</sub> and SO<sub>2</sub> Emissions

The Permittee shall submit to both EPA and DEQ a report of all excess emissions of NO<sub>x</sub> and SO<sub>2</sub> in accordance with 40 CFR 60.7(b) through (d). Excess NO<sub>x</sub> emissions shall be defined as in 40 CFR 60.334(c)(1), and excess SO<sub>2</sub> emissions shall be defined as in 40 CFR 60.334(c)(2).

4.4 Other Exceedences

The Permittee shall submit to the DEQ a report of any and all exceedences of any emission rate, visible emission or operating requirement listed in Sections 1 and 2 of this permit within a reasonable amount of time of the exceedance in accordance with IDAPA 16.01.01.130.

**DATE:** June 14, 2000

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0	5	5	-	0	0	0	3	3
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**SOURCE**

Unit 5C Gas Turbine

**4.5 Certification of Documents**

All documents including, but not limited to, records, monitoring data, supporting information, testing reports, or compliance certifications submitted to the DEQ shall contain a certification by a responsible official, in accordance with IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

<b>DATE:</b> June 14, 2000
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## PERMIT TO CONSTRUCT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101, et.seq.
- B. The Permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
1. To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  2. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emission testing in conformance with IDAPA 16.01.01.157 when deemed appropriate by the Director.
- D. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- E. The Permittee shall notify DEQ, in writing, of the required information for the following events within five (5) working days after occurrence:
1. Initiation of Construction - Date
  2. Completion/Cessation of Construction - Date
  3. Actual Production Startup - Date
  4. Initial Date of Achieving Maximum Production Rate - Production Rate and Date
- F. If emission testing is specified, the Permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one hundred and eighty (180) days after initial startup. Such testing must **strictly** adhere to the procedures outlined in IDAPA 16.01.01.157 and shall not be conducted on weekends or state holidays without prior written DEQ approval. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least fifteen (15) days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.
- The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in this permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- G. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

DATE: June 14, 2000