

June 14, 2000

MEMORANDUM

TO: Gwen P. Fransen, Regional Administrator
Coeur D'Alene Regional Office

FROM: Bill Rogers, Air Quality Engineer
State Technical Services Office 

SUBJECT: **PERMIT TO CONSTRUCT TECHNICAL ANALYSIS**
P-000109, PG&E Gas Transmission - Northwest, Eastport
(Permit to Construct Amendment, PTC No. 021-00013)

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*) for issuing Permits to Construct (PTC).

PROJECT DESCRIPTION

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 three, 1995, Title V Operating Permit (OP) applications due to changes in the *Rules* that may have affected the facilities. The request also asked that the OP applications be updated by addressing all PTC's issued since submittal of the 1995 OP applications.

As part of the submitted updates, PG&E GT-NW included changes they want to make to their existing PTC's before any OP is drafted. This permitting action addresses only those changes requested for PG&E GT-NW's Compressor Station #3 located near Eastport, Idaho.

SUMMARY OF EVENTS

On July 31, 1998, DEQ requested that PG&E GT-NW update their three, 1995, Title V OP applications. The updates for the Eastport facility were received on August 31, 1998.

DISCUSSION

1. Area Classification

This facility is located near Eastport, Idaho, which is located in northeastern Boundary County. The area is designated as an attainment or unclassifiable area for all criteria air pollutants. Boundary County is located in Air Quality Control Region (AQCR) 63 and Zone 11.

2. Facility Classification

This facility is a major facility as defined in IDAPA 16.01.01.006.55, but it is not a PSD major facility. The facility is not a designated facility according to IDAPA 16.01.01.006.27. The facility is subject to federal New Source Performance Standards (NSPS) in accordance with 40 CFR 60, Subpart GG, because the affected turbine has a heat input greater than 10.7 gigajoules per hour (10 MMBtu/hr) and was constructed, modified, or reconstructed after October 3, 1977. The SIC code defining the facility is 4922, and the facility is classified as A1.

3. Process Description

PG&E GT-NW operates a network of compressor stations that transmit natural gas from Canada to California along an underground pipeline system. The pipeline enters the United States in northern Idaho, continues through southeastern Washington and central Oregon, and enters California at its

northern border. Each compressor station consists of one or more turbine-driven compressors that move the natural gas through the pipeline. The turbines use the natural gas in the pipeline as fuel and provide energy for the compressors to induce the flow of the gas.

Compressor Station # 3 currently uses two turbine-driven compressors. The turbines are referenced as Unit 3A and Unit 3B. Unit 3A is a Cooper Rolls Coberra 125 gas turbine which has been in operation since 1969. Based on review of the facility's source file, it appears that Unit 3A has not been modified since its construction. Consequently, Unit 3A is not subject to NSR/PSD permit requirements. Unit 3A has a rated output capacity of 16,500 hp (ISO). Unit 3B is a Cooper Rolls Coberra 6000 gas turbine which was constructed in 1993. The PTC issued for Unit 3B was most recently amended in 1997. Unit 3B has a rated output capacity of 35,000 hp (ISO).

4. Equipment Listing

This analysis assumes Unit 3B has the following parameters:

Stack Height (ft):	42.0
Stack Diameter (ft):	9.6
Exhaust Gas Flowrate (acfm):	375,000 (average)
Exhaust Gas Temperature (°F):	900 (average)

5. Emission Estimates

This section discusses the proposed changes requested by the applicant. A spreadsheet was developed using permitted operating parameters to verify the emissions and associated ambient impacts from Unit 3B. The spreadsheet is incorporated as Appendix A of this document.

5.1 Short-term Emission Rate Limits

The applicant requests that the allowable short-term emission rate limits be changed from pound-per-hour (lb/hr) limits to ton-per-month (T/mo) limits. As a point of reference, Table 1 lists the allowable emission rates as they appear in the currently effective permit.

Table 1. Current Allowable Emission Rates - Unit 3B

SOURCE DESCRIPTION	TSP		PM-10		CO		VOC		NOx	SO2	
	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr	t/yr	lb/hr	t/yr
Turbine with permanent DLE combustor	1.3	5.7	1.3	5.7	115	143	0.7	2.9	197	0.74	3.25

Per current policy, the only time short-term (eg. lb/hr, lb/day) limits are required in a permit is to protect a short-term ambient standard, or to protect an NSPS or NESHAP standard, or a toxic air pollutant increment. Otherwise, short-term limits are to be documented in the technical memorandum for emissions inventory purposes. Inclusion of an unnecessary short-term limit in a permit presents the potential for noncompliance. For example, a hypothetical permit contains a short-term limit of 5 lb/hr but tests at 6 lb/hr. Modeling, however, indicates the source could operate at 15 lb/hr without exceeding the standard. The source could be called out of compliance for exceeding the 5 lb/hr limit, but in reality, no ambient standard has been exceeded. The violation is simply a "paper violation" upon which the source would have to get their permit modified to increase the short-term limit.

To prevent this scenario from occurring, current policy is to include only the most limiting pollutant in a permit. The most limiting pollutant is normally the pollutant emitted in the largest quantity given the sources current operating conditions. This pollutant can be limited on a pound-per-hour, ton-per-year basis, but that depends entirely on the modeling analysis. Oftentimes, the most limiting pollutant is only limited on a ton-per-year basis. Compliance or non-compliance with the emission rate limit(s) is demonstrated by monitoring and recording a surrogate parameter, such as throughput, operating hours, pressure drop, etc., on a regular frequency. Assuming the surrogate is limited in the permit which is typical, all other pollutants emitted by the source are considered to be "inherently limited." They are inherently limited because the limit placed on the surrogate precludes them from being emitted at a higher rate. And because they do not exceed any applicable standard, they are not put in the permit but are documented in the technical memorandum for emission inventory purposes.

Table 2 presents the emission inventory for Unit 3B. As can be seen, NOx is the most limiting pollutant. Modeling indicates that short-term limits are not required to protect any air quality standard, ambient or otherwise, for any pollutant. This being the case, only NOx needs to be specifically limited in the permit, and only as an annual limit. The surrogate parameter chosen as a means to demonstrate compliance with the emission limit is fuel throughput. The current permit limits fuel throughput for Unit 3B to 2,627 million standard cubic feet per year (MMscf/yr). This value is retained in the amended permit issued for this permitting action.

Table 2. Emission Inventory - Unit 3B

SOURCE DESCRIPTION	NOx		PM-10		CO		VOC		SO2	
	lb/hr	T/yr								
Unit 3B	44.98	197	1.3	5.7	32.60	143	0.70	3.07	0.87	3.81

In summary, short-term emission rate (lb/hr or lb/mo) limits do not have to be included in the permit because modeling indicates that no ambient standard will be exceeded based on the current permit limits. No other standard applies that requires a short-term limit. NOx is the most limiting pollutant and is the pollutant included in the permit. NOx is limited to 197 T/yr. All other pollutants are inherently limited and their respective emissions are inventoried in Table 2.

5.2 SO2 Emissions

The applicant requests that the SO2 T/yr limit be revised (amended) from 3.25 T/yr to 3.8 T/yr. SO2 emissions are calculated based on a factor of 2.9 lb/MMscf of fuel. Using the allowable fuel throughput of 2,627 MMscf/yr, SO2 emissions could be calculated to 3.8 T/yr.

The emission factor used to calculate SO2 emissions is based on a fuel sulfur limit imposed by the state of California. That limit is one (1) grain of sulfur per 100 standard cubic feet of natural gas. Because California is the end user of the Canadian-supplied natural gas, the Canadian gas producers meet the fuel sulfur requirement before the gas enters the United States. The imposed limit equates to an emission factor of 2.9 lb SO2/MMscf of natural gas¹.

¹ (1 gr/100 scf)*(1 lb/7000 gr)*(1E6 scf/MMscf) = 1.43 lb/MMscf. Mol. wt. of sulfur is 32 lb/lbmol. Mol. wt. of SO2 is 64 lb/lbmol. Therefore, SO2 emission factor = (64/32)*1.43 lb/MMscf = 2.86 lb/MMscf or 2.9 lb/MMscf.

Multiplying the SO₂ emission factor by the allowable fuel throughput limit yields an SO₂ emission rate of 3.81 T/yr, not 3.25 T/yr. As shown in Table 2, this value is corrected in the emissions inventory for Unit 3B.

In addition, the applicant requests that the NSPS fuel sulfur requirement be changed from the permitted 150 ppm SO₂ option to the 0.8 weight percent sulfur option. The NSPS allows for either option to be chosen. The request is made because EPA has granted approval to the applicant for a custom fuel monitoring schedule for fuel sulfur content as allowed by the NSPS.

5.3 PM-10 Emissions

While calculated PM-10 totals come to about 3.0 T/yr (see Appendix A), PG&E GT-NW wishes to retain the current permit limit of 5.7 T/yr. The proposed AP-42 section for gas turbines appears to indicate a higher PM potential and therefore PG&E GT-NW wishes to retain the higher number for permit purposes.

PM-10 is inherently limited by the limit placed on fuel throughput. However, an ambient assessment was conducted to assure NAAQS compliance at the higher PM-10 emission rate. The analysis indicates that PM-10 emissions will not exceed any applicable ambient air quality standard. Furthermore, there are no other regulatory standards that preclude the source from emitting at the higher rate. Because PM-10 is inherently limited, it is not included in the amended permit. The higher value is, however, retained in the emission inventory as requested.

5.4 NO_x Emission Factor

Condition 3.3 of permit 021-00013 specifies an emission factor of 0.15 lb/mscf, while condition 4.3 specifies an annual limit of 2,627 MMscf/yr. Rather than specify these as absolute permit limits, PG&E GT-NW is requesting that it be allowed to use these parameter thresholds for monitoring purposes.

PG&E GT-NW does not wish to consider a fuel consumption level and a NO_x to fuel relationship as applicable requirements under the Federal Clean Air Act. Rather PG&E GT-NW will use a fuel-based emission factor to monitor compliance with the NO_x permit limit. It is possible that the manufacturer could develop and implement systems that improve fuel efficiency, in which the emission factor may be higher than 0.15 lb/mscf while the fuel consumption rate will be lower. . . . Rather than list an emission factor and a fuel rate as applicable requirements, PG&E GT-NW wishes to establish 2,627 million scf/year as a fuel rate threshold below which will be deemed to be in compliance with the NO_x limit given the existing setup. . .

The NO_x emission factor for Unit 3B is based on the results of prior source tests conducted at full-load conditions. This emission factor is specific to Unit 3B. Using the emissions factor, the applicant arrived at a fuel throughput level that they feel satisfies their needs for Unit 3B. Because the applicant tracks fuel usage on a monthly basis, it makes sense to use throughput as the surrogate parameter for compliance purposes for NO_x emissions. Section 3.3 requires a source test in order to verify the NO_x emission factor. This requirement is relevant due to the relationship between the NO_x fuel factor and fuel throughput, however, the requirement is better off handled in the Title V OP process. Therefore, Section 3.3 of the February 21, 1997 permit is not included in this amended permit.

6. Modeling

The EPA approved SCREEN3 model was used to assess the ambient impacts from Unit 3B. The results of the modeling analysis indicate that emissions from Unit 3B will not cause or contribute to a violation of any applicable ambient air quality standard. The SCREEN3 output is presented as Appendix B of this document. The modeling analysis is presented as Appendix A.

7. Regulatory Review

7.1 IDAPA 16.01.01.201 PTC Required

A PTC is required for this amendment because it does not meet the exemption requirements specified in IDAPA 16.01.01.220 through .223.

7.2 IDAPA 16.01.01.210 Demonstration of Preconstruction Compliance with Toxic Standards

Compliance with toxic standards has been demonstrated.

7.3 IDAPA 16.01.01.577 Ambient Air Quality Standards for Specific Air Pollutants

Compliance with the NAAQS has been demonstrated.

7.4 Prevention of Significant Deterioration

Not applicable.

7.5 New Source Performance Standards 40 CFR 60

This facility is subject to federal regulation in accordance with 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines).

7.6 National Emission Standards for Hazardous Air Pollutants 40 CFR 61

Not applicable.

7.7 Maximum Achievable Control Technology Standards 40 CFR 63

Not applicable.

8. Permit Requirements

8.1 Emission Limits

8.1.1 NO_x Emissions - Unit 3B

NO_x emissions limited to 42 ppmvd @ 15% oxygen as part of a previous BACT determination. NO_x annual emission limited to 197 T/yr.

8.2 Operating Requirements

8.2.1 Fuel Throughput - Unit 4B

Natural gas throughput is limited to 2,627 MMscf/yr to demonstrate compliance with the 197 T/yr NO_x emission rate limit.

8.3 Monitoring Requirements

8.3.1 Fuel Throughput

Requirement is to monitor and record the throughput of natural gas to Unit 3B to demonstrate compliance with the fuel throughput limit.

8.4 Reporting Requirements

8.4.1 Excess Emission Report

Required by federal mandate.

9. Permit Coordination

9.1 State Air Program

This document will be routed internally to be added to the Title V operating permit materials.

10. AIRS

The AIRS forms applicable to this permitting action are presented as Appendix C of this document.

11. Fees

This facility is a major facility as defined by IDAPA 16.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 16.01.01.525. According to the Air Emissions Database Master list for 2000, this facility has registered 176.5 tons by paying fees in accordance with IDAPA 16.01.01.527. This amendment does not affect registration or registration fees.

RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that the PG&E Gas Transmission Northwest be issued amended PTC No. 021-00013 for their Compressor Station #3 located near Eastport, Idaho. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD Permit to Construct requirements.

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

APPENDIX A

*Emissions Spreadsheet
Compressor Station #3
Eastport*

*PG&E Gas Transmission - Northwest
P000109
June 2000*

PG&E GT-NW
 Compressor Station #3 - Unit 3B
 June 2000

EMISSION ESTIMATES

POLLUTANT	ANNUAL THROUGHPUT MMscf/yr	EMISSION FACTOR lb/MMscf	EMISSION FACTOR lb/hr	EMISSION FACTOR lb/Mscf	EMISSION RATE lb/hr	EMISSION RATE T/yr	SCREEN3 1-HR IMPACT ug/m3
PM-10	2627	2.29	----	----	0.69	3.01	0.1246
SO2	2627	2.9	----	----	0.87	3.81	0.1246
CO	2627	----	32.6	----	32.60	142.79	0.1246
NOx	2627	----	----	0.15	44.98	197.03	0.1246
VOC	2627	----	0.7	----	0.70	3.07	0.1246

MODELING ANALYSIS

	PREDICTED IMPACT PER AVERAGING TIME					STATE-WIDE BACKGROUND CONCENTRATIONS				
	1-HR AVE	3-HR AVE	8-HR AVE	24-HR AVE	ANNUAL	1-HR AVE	3-HR AVE	8-HR AVE	24-HR AVE	ANNUAL
	1	0.9	0.7	0.4	0.08	1	0.9	0.7	0.4	0.08
	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3
PM-10	---	---	---	0.034	0.007	---	---	---	86.0	32.7
SO2	---	0.098	---	0.043	0.009	---	543.0	---	144.0	23.5
CO	4.062	---	2.843	---	---	11450.0	---	515.0	---	---
NOx	---	---	---	---	0.448	---	---	---	---	40.0
VOC	0.087	---	---	---	---	0.0	---	---	---	---

PREDICTED IMPACT PLUS STATE-WIDE BACKGROUND CONCENTRATION

						NAAQS				
	1-HR AVE	3-HR AVE	8-HR AVE	24-HR AVE	ANNUAL	1-HR AVE	3-HR AVE	8-HR AVE	24-HR AVE	ANNUAL
	1	0.9	0.7	0.4	0.08	1	0.9	0.7	0.4	0.08
	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3
PM-10	---	---	---	86.034	32.707	---	---	---	150	50
SO2	---	543.098	---	144.043	23.509	---	1300	---	365	80
CO	11454.062	---	517.843	---	---	40000	---	10000	---	---
NOx	---	---	---	---	40.448	---	---	---	---	100
VOC	0.087	---	---	---	---	235	---	---	---	---

Applicant proposes to retain pm-10 limits of 1.3 lb/hr and 5.7 T/yr. To assure NAAQS compliance, the following is presented.

$$(1.3 \text{ lb/hr}) \left(\frac{0.1246 \text{ ug/m}^3}{\text{lb/hr}} \right) (0.4) = 0.065 \text{ ug/m}^3, \text{ 24-hr Ave}$$

$$(0.065 \text{ ug/m}^3) + 86.0 \text{ ug/m}^3 = 86.065 \text{ ug/m}^3 < 150 \text{ ug/m}^3$$

$$(1.3 \text{ lb/hr}) \left(\frac{0.1246 \text{ ug/m}^3}{\text{lb/hr}} \right) (0.08) = 0.013 \text{ ug/m}^3, \text{ Annual Ave.}$$

$$(0.013 \text{ ug/m}^3) + 32.7 \text{ ug/m}^3 = 32.713 \text{ ug/m}^3 < 50 \text{ ug/m}^3$$

APPENDIX B

*SCREEN3 Output
Compressor Station #3
Eastport*

*PG&E Gas Transmission - Northwest
P000109
June 2000*

5/23/00

0

9:25:12

0

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

PG&E GT-NW - Compressor Station #3

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = .126000
STACK HEIGHT (M) = 12.8016
STK INSIDE DIAM (M) = 2.9261
STK EXIT VELOCITY (M/S) = 25.3360
STK GAS EXIT TEMP (K) = 915.9278
AMBIENT AIR TEMP (K) = 293.1500
RECEPTOR HEIGHT (M) = .0000
URBAN/RURAL OPTION = RURAL
BUILDING HEIGHT (M) = .0000
MIN HORIZ BLDG DIM (M) = .0000
MAX HORIZ BLDG DIM (M) = .0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = 361.599 M**4/S**3; MOM. FLUX = 439.767 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

A	DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGM Z (M)
)	DWASH								
4	10.	.0000	1	1.0	1.0	1317.7	1316.72	15.23	14.9
5	100.	.1277E-01	6	1.0	1.1	10000.0	180.77	48.16	48.0
6	200.	.1306E-01	6	1.0	1.1	10000.0	180.77	48.61	48.1
	300.	.1343E-01	6	1.0	1.1	10000.0	180.77	49.29	48.3

2	NO								
	400.	.1387E-01	6	1.0	1.1	10000.0	180.77	50.17	48.5
1	NO								
	500.	.1437E-01	6	1.0	1.1	10000.0	180.77	51.24	48.7
2	NO								
	600.	.1673E-01	1	3.0	3.1	960.0	447.44	153.03	171.6
3	NO								
	700.	.4908E-01	1	3.0	3.1	960.0	447.44	173.99	229.3
1	NO								
	800.	.7330E-01	1	3.0	3.1	960.0	447.44	194.50	297.5
7	NO								
	900.	.9862E-01	1	2.0	2.0	665.8	664.76	241.72	392.5
8	NO								
	1000.	.1197	1	2.0	2.0	665.8	664.76	263.01	481.2
4	NO								

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 10. M:

	1091.	.1246	1	2.0	2.0	665.8	664.76	281.85	570.4
3	NO								

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** INVERSION BREAK-UP FUMIGATION CALC. ***

CONC (UG/M**3) = .1927
 DIST TO MAX (M) = 13937.24

 *** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
----- SIMPLE TERRAIN	.1246	1091.	0.
INV BREAKUP FUMI	.1927	13937.	--

APPENDIX C

*AIRS Information
Compressor Station #3
Eastport*

*PG&E Gas Transmission - Northwest
P000109
June 2000*

GENERAL REPORT INFORMATION:

USER ID: PRY
REPORT NAME: C-PG&E-E
FORMAT TYPE: SD
TITLE:

SELECTION CRITERIA:

REGN ME 10
SCSC ME 1602100013

SOURCE DATA INCLUDES:

PLANT LEVEL
POINT LEVEL

WITH ACTIONS
WITH COMMENTS

SORTING ELEMENTS:

JCL PARAMETERS:

ACCOUNT CODE: YIDA
FIMAS ID: AFSCP 1 59
TIME (MIN, SEC): 2
PRIORITY CODE: Z
MESSAGE CLASS: 1
NUMBER OF COPIES: HWET
FORM NUMBER: N
ROOM/BIN NUMBER: N59.U1002
HOLDING OUTPUT?
PRINTER SITE ID:
OUTPUT FILES:

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM

PGM: AFP627
PAGE: 2

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PG&E GAS TRANSMISSION-NORTHWEST

STATE: ID/16 CITY: - EASTPORT

COUNTY: 021 - BOUNDARY AQCR: 063

PLANT NAME: PG&E GAS TRANSMISSION-NORTHWEST

ADDRESS : 2.2 MI S OF EASTPORT

CITY,STATE: EASTPORT, ID 83826

DUNN & BRADSTREET:

EPA ID NUMBER : .IDD981768419

STANDARD INDUSTRIAL CLASSIFICATIONS:

4922 - NATURAL GAS TRANSMISSION

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS : 0 - OPERATING

LAST PLANT UPDATE : 00/03/20

REGIONAL PLANNING :

LOCAL CONTROL REGN:

INSPECTOR :

MONITORING INFORMATION:

SOURCE: AMBIENT:

MAILING ADDRESS:

NAME : PG&E GAS TRANSMISSION-NORTHWEST

ADDRESS : 2100 SW RIVER PARKWAY

CITY,STATE: PORTLAND,OR 97201

HIGH PRIORITY VIOLATION:

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -

CLASSIFICATION: A

LAST INSPECT. : 94/08/25 TYPE: 17

STATE - EPA

TYPE:

OPERATING STATUS: 0 - OPERATING

STATE REGISTRATION:

PLANT DESCRIPTION: NAT GAS COMPRESSOR STN #3

GOVT FAC.: 0 - ALL OTHER FACILITIES NOT

CAPACITY: 37500 HP

COMPLIANCE CONTACT : STEVE WEBB , (503) 833-4000

PRIORITY : -

CEMSS INFO (Y/N):

PLANT COMMENT:

INDIRECT COMMENT COMMENT

SOURCE # NO.

001 C

CO. NAME CHANGED FROM PACIFIC GAS TRANSMISSION CO. TO PG&E
GAS TRANSMISSION-NORTHWEST ON 1/1/98.

AIR PROGRAM CODES:

V - TITLE V PE 0 - OPERATING

INSPECTIONS:

EVEN YEAR : STRATEGY:

ODD YEAR : STRATEGY:

REPEAT VIOLATION FLAG/DATE:

STATE - EPA

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -

CLASSIFICATION: A

FREQUENCY:

FREQUENCY:

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM

PGM: AFP627
PAGE: 3

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - EASTPORT
COUNTY: 021 - BOUNDARY AOCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS: 0 - OPERATING
AFS PLANT ID:

TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION: -
STAFF: CDA - COEUR D'ALENE

RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -

AIR PROGRAM POLLUTANTS:

FACIL -

LOADING: -
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION: A
ATTAIN/NONATTN: -
STATE -EPA-

AIR PROGRAM CODES:
0 - SIP 0 - OPERATING
INSPECTIONS:
EVEN YEAR : STRATEGY:
ODD YEAR : STRATEGY:
REPEAT VIOLATION FLAG/DATE:
TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION: -
STAFF: CDA - COEUR D'ALENE

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION: A
RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -
STATE -EPA-

AIR PROGRAM POLLUTANTS:

PT - SUSPENDED PARTICULATE (TS

LOADING: -
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION: A
ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -
STATE -EPA-

AIR PROGRAM CODES:
6 - PSD 0 - OPERATING
INSPECTIONS:
EVEN YEAR : STRATEGY:
ODD YEAR : STRATEGY:
REPEAT VIOLATION FLAG/DATE:
TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION: -

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION: A
RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -
STATE -EPA-

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - EASTPORT
COUNTY: 021 - BOUNDARY AOCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 '9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

STAFF: CDA - COEUR D'ALENE

STATE IMPLEMENTATION PLAN: -

AIR PROGRAM POLLUTANTS:

PT	-	SUSPENDED PARTICULATE (TS)	COMPLIANCE : 3 - IN COMPLIANCE -	INSPECTIO : -	STATE - EPA
		LOADING: -	CLASSIFICATION: A	ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -	
		RDE14 :			
		TOXICITY LEVEL:			
		STATE REGULATION NUMBER:			
PM10	-	PM10 TOTAL 0-10UM	COMPLIANCE : 3 - IN COMPLIANCE -	INSPECTIO : -	STATE - EPA
		LOADING: -	CLASSIFICATION: A	ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -	
		RDE14 :			
		TOXICITY LEVEL:			
		STATE REGULATION NUMBER:			
CO	-	CARBON MONOXIDE	COMPLIANCE : 3 - IN COMPLIANCE -	INSPECTIO : -	STATE - EPA
		LOADING: -	CLASSIFICATION: A	ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -	
		RDE14 :			
		TOXICITY LEVEL:			
		STATE REGULATION NUMBER:			
VOC	-	VOLATILE ORG COMPNDS	COMPLIANCE : 3 - IN COMPLIANCE -	INSPECTIO : -	STATE - EPA
		LOADING: -	CLASSIFICATION: A	ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -	
		RDE14 :			
		TOXICITY LEVEL:			
		STATE REGULATION NUMBER:			
NO2	-	NITROGEN DIOXIDE	COMPLIANCE : 3 - IN COMPLIANCE -	INSPECTIO : -	STATE - EPA
		LOADING: -	CLASSIFICATION: A	ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -	
		RDE14 :			
		TOXICITY LEVEL:			
		STATE REGULATION NUMBER:			
S02	-	SULFUR DIOXIDE	COMPLIANCE : 3 - IN COMPLIANCE -	INSPECTIO : -	STATE - EPA

DATE: 06/07/00

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STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - EASTPORT
COUNTY: 021 - BOUNDARY AQCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS : 0 - OPERATING

AFS PLANT ID:

LOADING: -
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:
COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION: A
ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -

AIR PROGRAM CODES:
9 - NSPS
0 - OPERATING

INSPECTIONS:
EVEN YEAR : STRATEGY:
ODD YEAR : STRATEGY:
REPEAT VIOLATION FLAG/DATE:
TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION:
STAFF: CDA - COEUR D'ALENE

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION:

RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN:

AIR PROGRAM POLLUTANTS:

N02 - NITROGEN DIOXIDE
LOADING: -
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION:
ATTAIN/NONATTN: -

ACT. NO.	INDIR. NO.	AIR PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY	RDB	PLLT/CASN	RDE
001	60	11	ID PTC ISSUED	92/05/05	92/05/05			08 ISSUED	0			
002	60	03	START CONST.	92/05/06	92/05/06			01 ACTION ACHIEVED	0			
003	60	04	END CONSTR.	99/01/01	/			0				
004	60	R1	NEW SRCE START	93/02/03	93/02/03			01 ACTION ACHIEVED	0			

COMMENT NO.

001 COOPER ROLLS COBERRA NAT GAS FIRED TURBINE

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PG&E GAS TRANSMISSION-NORTHWEST
 STATE: ID/16 CITY: - EASTPORT
 COUNTY: 021 - BOUNDARY AQCR: 063
 GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
 AIR-PROGRAM CODE(S): V 0 6 9
 OPERATING STATUS : 0 - OPERATING

ACT. NO.	INDIR. NO.	AIR PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	CAT.	STAFF	RESULTS	PENALTY	RD8	PLLT/CASN	RDE
005	60	18	SOURCE TST CON	93/06/25	93/06/25			19 IN COMPLIANCE	0			

COMMENT NO. 001 TO MEASURE NO2 EMISSIONS FROM UNIT B EQUIPPED W/TEMP. COMBUSTOR. RESULTS DUE W/IN 30 DAYS OF PERFORMING TEST

COMMENT NO. 002 RESULTS: NO2 = 147 PH, ALLOWED 214 PH
 CO = 12.7 PH, ALLOWED 115 PH
 SO2 = 0.05 PH, ALLOWED 0.063 PH

COMMENT NO. 003 FUEL: NAT GAS (TO DRIVE COMPRESSOR) W/AIR
 CEM RPT INCLUDED (CONDUCTED 6/24-25/93)

COMMENT NO. 006 85 SPEC ACT DUE/C 97/02/03 95/11/02
 01 ACTION ACHIEVED

COMMENT NO. 007 18 SOURCE TST CON 95/11/16 / /
 NEW 35,000 HP TURBINE SHALL BE RETROFITTED W/DLE COMBUSTOR.
 DATE FOR INSTALLATION EXTENDED FROM 1/1/95 TO 2/3/97 WITH 1/2/95 PTC

COMMENT NO. 008 28 INSP ATTEMPT 93/09/30 93/05/07
 E34 13 NOT OPERATING

COMMENT NO. 001 ACCESS NOT AVAILABLE, SO INSPECTION NOT COMPLETED

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM
 STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PG&E GAS TRANSMISSION-NORTHWEST
 STATE: ID/16 CITY: - EASTPORT
 COUNTY: 021 - BOUNDARY AOCR: 063
 GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
 AIR-PROGRAM CODE(S): V 0 6 9
 OPERATING STATUS : 0 - OPERATING
 AFS PLANT ID:

ACT. NO.	INDIR. NO.	AIR PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY RDB	PLLT/CASN RDE
009	06	17 ST COMP	INSPEC	93/09/30	93/05/10		E34	19 IN COMPLIANCE		0
COMMENT NO. 001 UNIT B-TEMP. COMBUSTOR NOT OPERATING DURING INSPECTION										
010	06	85 SPEC ACT	DUE/C	94/01/30	94/01/19			01 ACTION ACHIEVED		0
COMMENT NO. 001 AMT OF NAT GAS COMBUSTED IN TEMP COMBUSTOR-DUE 30 DAYS OF END OF CALENDAR YR										
COMMENT NO. 002 UNIT 3B INSTALLED DURING 1993. OPERATED 686 HRS IN 1993										
011	06	17 ST COMP	INSPEC	94/09/30	94/08/25		E34	19 IN COMPLIANCE		0
COMMENT NO. 001 COOPER-ROLLS CABERRA 125 (UNIT A) WAS DOWN FOR MAINTENANCE										
012	06	85 SPEC ACT	DUE/C	94/09/20	94/09/20			19 IN COMPLIANCE		0 A
COMMENT NO. 001 RATA ON NOX CCEMS TO BE CONDUCTED ON COMPRESSOR STN 3 UNIT B										
013	06	07 QTR REPORT	DUE	95/01/30	95/01/23			01 ACTION ACHIEVED		0 A
COMMENT NO. 001 ANNUAL RPT-AMT OF NAT GAS COMBUSTED IN TEMP COMBUSTOR EACH YR										

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PC&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - EASTPORT
COUNTY: 021 - BOUNDARY AQR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS : 0 - OPERATING
AFS PLANT ID:

ACT. NO.	INDIR. NO.	AIR PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	CAT.	STAFF	RESULTS	PENALTY	RD8	PLLT/CASN	RDE	16
014	069	11	ID PTC ISSUED	95/01/02	95/01/02			08 ISSUED					0
COMMENT NO.													
001	REVISION (REQUIRED INSTALLATION OF DLE (LOW NOX) COMBUSTOR ON UNIT B EXTENDED FROM 1/1/95 TO 2/3/97)												
002	UNIT B DLE OPERATIONAL AND ACHIEVED MAX PROD ON 11/2/95												
COMMENT NO.													
015	069	85	SPEC ACT DUE/C	95/11/16	95/11/16								0 A
COMMENT NO.													
001	1995 NO2 CCENS RATA - STATIONARY NAT GAS TURBINE COMPLIANCE & MONITOR CERTIFICATION TESTING REC'D 12/14/95												
002													
COMMENT NO.													
016	069	11	ID PTC ISSUED	97/02/21	97/02/21			08 ISSUED					0
COMMENT NO.													
001	AMENDMENT (MONITORING VIA FUEL CONSUMPTION)												
COMMENT NO.													
017	069	85	SPEC ACT DUE/C	96/09/17	96/09/17			19 IN COMPLIANCE					0 A
COMMENT NO.													
001	1996 NO2 CCENS RATA-STATIONARY NAT GAS TURBINE COMPRESSOR STATION 3, UNIT B												

DATE: 06/07/00

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STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - EASTPORT
COUNTY: 021 - BOUNDARY AQCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9 AFS PLANT ID:
OPERATING STATUS: 0 - OPERATING

POINT INFORMATION: / 010 M - NAT GAS COMBUSTOR-UNIT 3A

STATE SENSITIVE INDICATOR: N
DESIGN CAPACITY: 12500 UNITS: 6 - HORSEPOWER
CONTINUOUS EMISSIONS (Y/N): N
REGULATED SOURCE CLASS CODE: 20100201
OPERATING RESTRICTIONS:

LAST INSPECT. : / / STATE: - - - - - EPA
SOOT BLOWING : / / TYPE: - - - - -
TIMES PER DAY : 0 TIMES PER WEEK: 0 AM OR PM:

COMMENT COMMENT
NO.

- 001 C COOPER-ROLLS COBERRA 125
- 002 C STACK DATA: HEIGHT-29', DIAM-7'

AIR PROGRAM: 0 - SIP
POLLUTANT-CODE: NO2

T - TEMPORARILY CLOSED
COMPLIANCE STATUS: 3 - IN COMPLIANCE - INSPECTIO : -
STATE-IMPLEMENTATION-PLAN: - RDE7: RDE15:

POINT INFORMATION: / 020 M - NAT GAS COMBUSTOR-UNIT 3B

STATE SENSITIVE INDICATOR: N
DESIGN CAPACITY: 35000 UNITS: 6 - HORSEPOWER
CONTINUOUS EMISSIONS (Y/N): N
REGULATED SOURCE CLASS CODE: 10300601
OPERATING RESTRICTIONS:

LAST INSPECT. : 93/06/25 TYPE: 18 : / / TYPE:
SOOT BLOWING :
TIMES PER DAY : 0 TIMES PER WEEK: 0 AM OR PM:

COMMENT COMMENT
NO.

- 001 C COOPER-ROLLS COBERRA 6000
- 002 C CONTROLS: NONE
- 003 C STACK DATA: HEIGHT-42', DIAM-9.6', FLOW RATE-361,000 ACFM,
TEMP-1,189 DEG F, EXIT GAS VELOCITY-83.1 FT/SEC

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM

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STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00013 - PC&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - EASTPORT
COUNTY: 021 - BOUNDARY AQCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6-9 AFS PLANT ID:
OPERATING STATUS: 0 - OPERATING

POINT INFORMATION: / 020 M - NAT GAS COMBUSTOR-UNIT 3B

AIR PROGRAM: 6 - PSD
POLLUTANT-CODE: NO2

0 - OPERATING

COMPLIANCE STATUS: 3 - IN COMPLIANCE - INSPECTIO

RDE7: RDE15:

AIR PROGRAM: 9 - NSPS
POLLUTANT-CODE: NO2

0 - OPERATING

COMPLIANCE STATUS: 3 - IN COMPLIANCE - INSPECTIO

RDE7: RDE15:

AIR PROGRAM: 0 - SIP
POLLUTANT-CODE: NO2

0 - OPERATING

COMPLIANCE STATUS: 3 - IN COMPLIANCE - INSPECTIO

RDE7: RDE15:

ACT. NO.	AIR PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	ACT. STAFF	RESULTS	PENALTY	PLLT/CASN	RDE 16
001	6	18 SOURCE TST CON	93/06/25	93/06/25		19 IN COMPLIANCE	0		

COMMENT NO.

001 S. T. W/TEMP. COMBUSTOR

RESULTS:

NO2 = 147 PH, ALLOWED 214 PH
CO = 12.7 PH, ALLOWED 115 PH
SO2 = 0.05 PH, ALLOWED 0.063 PH

POLLUTANT STATE REGULATION ALLOWABLE UNITS POT UCNTRL UNITS POT CNTRL UNITS ACTUAL UNITS/METHOD

POLLUTANT	STATE REGULATION	ALLOWABLE UNITS	POT UCNTRL UNITS	POT CNTRL UNITS	ACTUAL UNITS/METHOD
CO	12.7 PH	115 PH			
SO2	0.05 PH	0.063 PH			
VOC					
NOx					

only allowable is NOx = 197 T/yr.