



October 22, 1999

CERTIFIED MAIL # Z 273 659 098

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

RE: P-990013, PG&E Gas Transmission - Northwest, Sandpoint
(Permit to Construct Modification, PTC No. 017-00037)

Dear Mr. Cherian:

On February 1, 1999, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received a Permit to Construct (PTC) application from PG&E Gas Transmission - Northwest (PG&E GT-NW) for a modification of PG&E GT-NWs' Compressor Station 4 located near Sandpoint, Idaho. On March 3, 1999, the application was determined complete. Based on review of the application 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 modified PTC No. 017-00037 which replaces the PTC dated March 20, 1998. Please note that it is no longer required to observe and record visible emissions during any required performance testing at this facility.

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

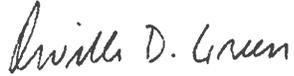
You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Tom Harman of the Coeur d'Alene Regional Office will contact you regarding this meeting. DEQ strongly recommends that, in addition to your facility's plant 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.

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If you have any questions regarding the terms or conditions of the enclosed permit, please contact Sue Richards, Program Manager, Air Quality Permit Program, at (208) 373-0502.

Sincerely,



Orville D. Green
Administrator
State Air Quality Program

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Enclosures

cc:	P. Rayne, AFS	Source File (017-00037)
	R. Wilkosz	Permit File Manual
	T. Harman, Coeur d'Alene RO	COF
	EPA IOO	

PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION

PERMIT NUMBER

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

0 1 7 - 0 0 0 3 7

SOURCE

Unit 4B and Unit 4C Gas Turbines

1. EMISSION LIMITS

1.1 NO_x Emissions - Unit 4B

Oxides of nitrogen (NO_x) emissions from the gas turbine stack shall not exceed two hundred twenty-three parts per million by volume on a dry basis (223 ppmvd) at 15% oxygen in accordance with 40 CFR 60.332. The annual NO_x emission rate shall not exceed seventy-three tons per year (73 T/yr).

1.2 NO_x Emissions - Unit 4C

Oxides of nitrogen (NO_x) emissions from the gas turbine stack shall not exceed two hundred twenty parts per million by volume on a dry basis (220 ppmvd) at 15% oxygen in accordance with 40 CFR 60.332. The annual NO_x emission rate shall not exceed three hundred fifty-two tons per year (352 T/yr).

1.3 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 turbines in accordance with 40 CFR 60.333(b).

2.2 Fuel Type

The turbines shall be fired by natural gas exclusively.

2.3 Fuel Throughput

2.3.1 Unit 4B

The maximum amount of natural gas combusted in this compressor turbine shall not exceed one billion, one hundred ten million standard cubic feet per any consecutive 12-month period (1,110,000,000 scf/yr).

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PERMITTEE, PROJECT, AND LOCATION**

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

PERMIT NUMBER

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SOURCE

Unit 4B and Unit 4C Gas Turbines

2.3.2 Unit 4C

The maximum amount of natural gas combusted in this compressor turbine shall not exceed nine hundred sixty-three million, six hundred thousand standard cubic feet per any consecutive 12-month period (963,600,000 scf/yr).

3. MONITORING REQUIREMENTS

3.1 NO_x and SO₂ 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_x and SO₂ emissions from the Unit 4B and Unit 4C 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.

3.2 Fuel Throughput - Unit 4B and Unit 4C

The Permittee shall monitor and record the amount of natural gas combusted in each turbine 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 made 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 the 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.

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PERMIT NUMBER

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

0 1 7 - 0 0 0 3 7

SOURCE

Unit 4B and Unit 4C Gas Turbines

4.3 Excess NO_x and SO₂ Emissions

The Permittee shall submit to both EPA and DEQ a report of all excess emissions of NO_x and SO₂ in accordance with 40 CFR 60.7(b) through (d). Excess NO_x emissions shall be defined as in 40 CFR 60.334(c)(1), and excess SO₂ 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.

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.

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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.

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