STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1445 North Orchard • Boise, Idaho 83706 • (208) 373-0550
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

February 24, 2017

Jeremy Jensen
Idaho Power Company – Mechanical Engineer
Bennett Mountain Power Project
1221 W. Idaho Street
Boise, Idaho 83702

RE: Facility ID No. 039-00025, Idaho Power Company – Bennett Mountain
Final Tier I Operating Permit Letter

Dear Mr. Jensen:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. T1-2016.0039 Project 61748 to Idaho Power Company – Bennett Mountain in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules). Please be advised that your final Tier I permit number has been updated. The previous permit number used during the facility draft and public comment phases was T1-2016.0036.

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. T1-2011.0129, issued March 23, 2012. The enclosed operating permit is based on the information contained in your permit application received on July 11, 2016. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with J.R. Fuentes, Title V Source Inspector, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Morrie Lewis at (208) 373-0502 or Morrie.Lewis@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/ML Permit No. T1-2016.0039 Project 61748

Enclosure

Air Quality

TIER I OPERATING PERMIT

Permittee	Idaho Power Company – Bennett Mountain
Permit Number	T1-2016.0039
Project ID	61748
Facility ID	039-00025
Facility Location	2750 N.E. Industrial Way Mountain Home, ID 83647

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules) (IDAPA 58.01.01.300–386) (b) incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210 and the permittee elects not to incorporate those terms and conditions into this operating permit.

The permittee shall comply with the terms and conditions of this permit. The effective date of this permit is the date of signature by DEQ on this cover page.

Date Issued	February 24, 2017
Date Expires	February 24, 2022

Morrie Lewis, Permit Writer

Mike Simon, Stationary Source Manager

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1 Acronyms, Units, and Chemical Nomenclature

ASTM	American Society for Testing and Materials
bhp	brake horsepower
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
CFR	Code of Federal Regulations
CGA	cylinder gas audits
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO_2	carbon dioxide
COMS	continuous opacity monitoring systems
DEQ	Idaho Department of Environmental Quality
EPA	United States Environmental Protection Agency
GHG	greenhouse gases
gr/dscf	grains (1 lb = 7,000 grains) per dry standard cubic foot
HAP	hazardous air pollutants
HHV	higher heating value
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
kW	kilowatts
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O_2	oxygen
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
ppmv	parts per million by volume
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTC	permit to construct
RATA	relative accuracy test audit
RICE	reciprocating internal combustion engines
Rules	Rules for the Control of Air Pollution in Idaho
SO_2	sulfur dioxide
T/yr	tons per consecutive 12 calendar-month period
T1	Tier I operating permit
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds

2 Permit Scope

Purpose

2.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules. The purpose of this permitting action is to renew the current operating permit.

2.2 This Tier I operating permit incorporates the following permit:

- Permit to Construct No. P-050002, issued June 21, 2005.

2.3 This Tier I operating permit replaces the following permit:

- Tier I Operating Permit No. T1-2011.0129, issued March 23, 2012.

Regulated Sources

Table 2.1 lists all sources of regulated emissions in this permit.

Table 2.1 Regulated Sources

Permit Section	Source	Control Equipment
4	One Siemens Westinghouse 501F natural gas-fired simple cycle combustion turbine	Dry Low NO_x combustors
5	One natural gas fuel heater	None
6	Emergency diesel generator	None

3 Facility-Wide Conditions

Table 3.1 contains a summary of requirements that apply generally to emissions units at the facility.

Table 3.1 Applicable Requirements Summary

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1–3.4	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651; P-050002	3.2–3.4, 3.23, 3.28
3.5–3.6	Odors	Reasonable control	IDAPA 58.01.01.775–776; P-050002	3.6, 3.23, 3.28
3.7–3.9	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625; P-050002	3.8–3.9, 3.23, 3.28
3.10–3.14	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136; P-050002	3.10–3.14, 3.23, 3.28
3.15	PM	Natural gas only 0.015 gr/dscf at 3% O_2 Fuel oil only 0.05 gr/dscf at 3% O_2	IDAPA 58.01.01.676–677	(see Emissions Unit/Source Name Section)
3.16–3.17	Sulfur Content	ASTM grade No. 1 fuel oil $\leq$ 0.3% by weight ASTM grade No. 2 fuel oil $\leq$ 0.5% by weight	IDAPA 58.01.01.725	3.17, 3.23, 3.28
3.18	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–623	3.18, 3.23, 3.28
3.19	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	3.19, 3.23, 3.28
3.20	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	3.20, 3.23, 3.28
3.21	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	3.21, 3.23, 3.28
3.22	NSPS General Provisions	Compliance with 40 CFR 60/63, Subpart A	IDAPA 58.01.01.107.03	3.22, 3.23, 3.28
3.23	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06	3.23, 3.28
3.24–3.27	Testing	Compliance testing	IDAPA 58.01.01.157	3.24–3.27, 3.23, 3.28
3.28	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	3.28
3.29	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	3.29

Fugitive Dust

3.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.

[IDAPA 58.01.01.650–651, 4/11/15; PTC No. P-050002, 6/21/05]

3.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94; PTC No. P-050002, 6/21/05]

3.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; PTC No. P-050002, 6/21/05]

3.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

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

Odors

3.5 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; PTC No. P-050002, 6/21/05]

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

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

Visible Emissions

3.7 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, NOx, 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; PTC No. P-050002, 6/21/05]

3.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[IDAPA 58.01.01.322.06, 5/1/94]

3.9 The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.07, 5/1/94]

Excess Emissions

Excess Emissions-General

3.10 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.

During an excess emissions event, the permittee shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

Excess Emissions-Startup, Shutdown, and Scheduled Maintenance

3.11 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133, 4/11/06]

Excess Emissions-Upset, Breakdown, or Safety Measures

3.12 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility wide conditions (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134, 4/11/06]

Excess Emissions-Reporting and Recordkeeping

3.13 The permittee shall submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135, 4/11/06]

3.14 The permittee shall maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136, 4/5/00]

Fuel-Burning Equipment

3.15 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid.

[IDAPA 58.01.01.676–677, 5/1/94]

Sulfur Content

3.16 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
- DEQ may approve an exemption from these fuel sulfur content requirements if the permittee demonstrates that, through control measures or other means, SO_2 emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 4/11/15]

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

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

3.18 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]

Asbestos

3.19 NESHAP 40 CFR 61, Subpart M—National Emission Standard for Asbestos

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—"National Emission Standard for Asbestos."

[40 CFR 61, Subpart M]

Accidental Release Prevention

3.20 A permittee 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)]

Recycling and Emissions Reductions

3.21 40 CFR Part 82—Protection of Stratospheric Ozone

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]

NSPS General Provisions

3.22 NSPS 40 CFR 60, Subpart A-General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A-"General Provisions"-in accordance with 40 CFR 60.1. A summary of requirements for affected facilities is provided in Table 3.2.

Table 3.2 NSPS 40 CFR 60, Subpart A - Summary of General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	• All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to: Boise Regional Office 1445 N. Orchard Boise, ID 83706
60.7(a), (b), and (f)	Notification and Recordkeeping	• Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. • Notification shall be furnished of initial startup postmarked within 15 days of such date. • Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. • Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. • Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.7(a),(c),(d), (e), and (f)	Notification and Recordkeeping (CMS)	• Notification shall be furnished of the date upon which demonstration of the CMS performance commences. • Excess emissions and monitoring systems performance report shall be submitted semiannually, postmarked by January 30th and July 30th. Reports shall contain the information and be in the format specified in 40 CFR 60.7(c) and (d). • Records of CEMS subhourly measurements shall be maintained in accordance with the requirements of 40 CFR 60.7(f).
60.8	Performance Tests	• At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present. • Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished. • Performance testing facilities shall be provided as follows: Sampling ports adequate for test methods applicable to such facility. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f)

Table 3.2 NSPS 40 CFR 60, Subpart A – Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	• When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. • For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	• Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test. • The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided. • Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).
60.12	Circumvention	• No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.13	Monitoring Requirements (CMS)	• All CMS and monitoring devices shall be installed and operational prior to conducting performance tests required by 40 CFR 60.8. • A performance evaluation of the COMS or CEMS shall be conducted before or during any performance test and a written report of the results of the performance evaluation furnished. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COM within 10 days before a performance test, if using a COM to determine compliance with opacity during a performance test instead of Method 9. • The zero and span calibration drifts must be checked at least once daily and adjusted in accordance with the requirements in 40 CFR 60.13(d). • The zero and upscale (span) calibration drifts of a COMS must be automatically, intrinsic to the opacity monitor, checked at least once daily. • Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 60.13(e). • All CMS or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. CMS shall be located and installed in accordance with the requirements in 40 CFR 60.13(f) and (g). • Data shall be reduced and computed in accordance with the procedures in 40 CFR 60.13(h), (i), and (j).
60.14	Modification	• A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14. • Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.
60.15	Reconstruction	• An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

[40 CFR 60, Subpart A]

Monitoring and Recordkeeping

3.23 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Monitoring records 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]

Performance Testing

3.24 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.

3.25 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]

3.26 Unless a longer time is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 60 days upon request following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

3.27 The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the "Reports and Certifications" facility-wide condition.

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

Reports and Certifications

3.28 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130–136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550
Fax: (208) 373-0287

The periodic compliance certification required in the general provisions shall also be submitted within 30 days of the end of the specified reporting period to:

Part 70 Operating Permit Program
U.S. EPA Region 10, Mail Stop: OAW-150
1200 Sixth Ave., Suite 900
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/00]

Incorporation of Federal Requirements by Reference

3.29 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. Documents include, but are not limited to:

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60
- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[IDAPA 58.01.01.107, 3/25/16]

4 Emissions Unit No. 1 – Combustion Turbine

Summary Description

Table 4.1 describes the devices used to control emissions from the combustion turbine.

Table 4.1 Combustion Turbine Description

Emissions Units / Processes	Control Devices
170 MW Siemens Westinghouse 501F Combustion Turbine	Dry Low NO_x combustors

Table 4.2 contains only a summary of the requirements that apply to the combustion turbine. Specific permit requirements are listed below.

Table 4.2 Applicable Requirements Summary

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
4.1	NO_x	NSPS NO_x emissions limit	40 CFR 60.330	4.6, 4.12–4.19
4.2	SO_2 / sulfur content	NSPS SO_2 emissions limit	40 CFR 60.333	4.12, 4.15–4.16, 4.20
4.3	NO_x, CO	248.16 T/yr and 248.29 T/yr, respectively	P-050002	4.6, 4.7
4.4	PM	0.015 gr/dscf at 3% O_2	P-050002	4.5
4.5	Fuel restrictions	Natural gas with sulfur content not to exceed 0.02 gr/dscf	P-050002	4.9
4.6	NO_x	Operation and upkeep of NO_x CEMS	40 CFR 75; P-050002	4.8, 4.10, 4.13
4.7	CO	Operation and upkeep of CO CEMS	P-050002	4.8, 4.11, 4.13
4.8	Turbine exhaust flowrate	Quantification methodology	P-050002	4.13

Permit Limits / Standard Summary

4.1 NSPS 40 CFR 60, Subpart GG—Standard for Nitrogen Oxides

On and after the date that performance test required by 40 CFR 60.8 is completed; the permittee shall not discharge into the atmosphere from the combustion turbine, any gases that contain NO_x in excess of:

$$STD = 0.0075\frac{(14.4)}{Y} + F$$

where: STD = allowable NO_x emissions (percent by volume at 15% 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 as actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt-hour.

F = NO_x emissions allowance for fuel-bound nitrogen as defined in 40 CFR 60.332(a)(3).

[40 CFR 60.332; PTC No. P-050002, 6/21/05]

4.2 NSPS 40 CFR 60, Subpart GG—Standard for Sulfur Dioxide

The permittee shall comply with one or the other of the following conditions:

- The permittee shall not cause to be discharged into the atmosphere from the Combustion Turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.
- The permittee shall not burn in the Combustion Turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw).

[40 CFR 60.333]

4.3 Emissions of NO_x and CO from the combustion turbine stack shall not exceed any corresponding emissions rate limits listed in Table 4.3.

Table 4.3 Combustion Turbine Emissions Limits [(a)]

Source Description	NO_x	CO
	T/yr	T/yr
Combustion Turbine	248.16	248.29

[(a)] The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

[PTC No. P-050002, 6/21/05]

4.4 Emissions of PM from the combustion turbine shall not exceed 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume when fired with natural gas, as required by IDAPA 58.01.01.676.

[PTC No. P-050002, 6/21/05]

Operating Requirements

4.5 The combustion turbine shall be fired exclusively by natural gas. The natural gas burned in the combustion turbine shall not contain sulfur in excess of 0.02 gr/dscf of natural gas.

[PTC No. P-050002, 6/21/05]

4.6 The permittee shall install, certify, operate, and maintain in accordance with the requirements of 40 CFR 75, a NO_x CEMS, consisting of a NO_x pollutant concentration monitor and an oxygen or carbon dioxide diluent gas monitor, with automated data acquisition and handling system for measuring and recording the NO_x concentration, in ppmv, and NO_x emission rate, in pounds per hour, discharged to the atmosphere from the combustion turbine stack. The permittee shall fully comply with all requirements set forth in 40 CFR 75, Subpart F and 40 CFR 60, Appendices B and F.

[PTC No. P-050002, 6/21/05]

4.7 The permittee shall install, certify, operate, and maintain a CEMS consisting of a CO pollutant concentration monitor and an oxygen diluent gas monitor. The CEMS shall be equipped with an automated data acquisition and handling system for measuring and recording the CO concentration, in ppmv, and CO emissions rate, in pounds per hour, discharged to the atmosphere from the combustion turbine stack. The permittee shall fully comply with all requirements set forth in 40 CFR 60, Appendices B and F.

[PTC No. P-050002, 6/21/05]

4.8 The permittee shall use the methodologies prescribed by Method 19 in 40 CFR 60, Appendix A, to quantify the turbine exhaust flowrate.

[PTC No. P-050002, 6/21/05]

Monitoring and Recordkeeping Requirements

4.9 The permittee shall monitor and record the amount of natural gas combusted in the turbine on an hourly basis. The amount shall be recorded as cubic feet per hour. All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

[PTC No. P-050002, 6/21/05]

4.10 For the NO_x CEMS, the permittee shall fully comply with all monitoring requirements established by 40 CFR 72.9(b). The permittee shall fully comply with all monitoring and recordkeeping requirements set forth in 40 CFR 75, Subpart F and 40 CFR 60, Appendix F. All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

[PTC No. P-050002, 6/21/05]

4.11 The permittee shall perform relative accuracy test audits (RATAs) on the CO CEMS, in accordance with 40 CFR 60, Appendix F. The permittee shall perform RATAs and cylinder gas audits (CGAs) on the CEMS except as noted below, unless otherwise approved by DEQ:

- A CO CGA is not required during any calendar quarter in which the unit operates less than 168 hours. A CGA shall be conducted at least once every four calendar quarters, regardless of operation.
- A CO RATA is required once every four operating quarters (quarter with more than 168 hours of operation), and at least once every eight calendar quarters regardless of operation.
- A CO CGA and 7-day calibration drift are not required on any span of less than 30 ppmv.
- Stratification testing results may be considered valid for up to five years when the stack gas source and source operation remain unchanged. Reference method sampling location shall be determined based on the most recent stratification test.

All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

[PTC No. P-050002, 6/21/05]

4.12 The permittee shall comply with the fuel sulfur and nitrogen monitoring provisions of 40 CFR 60.334 and 40 CFR Part 75, Appendix D. All data shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request. The permittee may, upon EPA approval and DEQ notification, use a single sampling location to monitor fuel for both the Evander Andrews Power Complex, as well as the Bennett Mountain Power Plant.

- Excess emissions of NO_x shall be reported for all periods of unit operation, including startup, shutdown and malfunction.
- For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined as follows for turbines using NO_x and diluent CEMS:
  - An hour of excess emissions shall be any unit operating hour in which the 4-hour rolling average NO_x concentration exceeds the applicable emission limit in 40 CFR 60.332(a)(1) or (2). For the purposes of this subpart, a "4-hour rolling average NO_x concentration" is the arithmetic average of the average NO_x concentration measured by the CEMS for a given hour (corrected to 15 percent O_2 and, if required under 40 CFR 60.335(b)(1), to

ISO standard conditions) and the three unit operating hour average NO_x concentrations immediately preceding that unit operating hour.

- A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour, for either NO_x concentration or diluent (or both).
- Each report shall include the ambient conditions (temperature, pressure, and humidity) at the time of the excess emission period and (if the permittee has claimed an emission allowance for fuel-bound nitrogen) the nitrogen content of the fuel during the period of excess emissions. Ambient conditions do not have to be reported if the permittee opts to use the worst case ISO correction factor as specified in 40 CFR 60.334(b)(3)(ii), or if the permittee is not using the ISO correction equation under the provisions of 40 CFR 60.335(b)(1).

[40 CFR 60.334; PTC No. P-050002, 6/21/05]

4.13 The permittee shall monitor and record the information listed below for the combustion turbine. The listed information shall be compiled in accordance with the emissions calculation protocol, submitted to DEQ on April 19, 2004. All data shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

- The total NO_x emissions rate in tons per each calendar month.
- The total, cumulative NO_x emissions rate in tons per each consecutive 12-month period.
- The total CO emissions rate in tons per each calendar month.
- The total, cumulative CO emissions rate in tons per each consecutive 12-month period.

[PTC No. P-050002, 6/21/05]

Reporting Requirements

4.14 The permittee shall submit a test protocol to DEQ for each certification and recertification of the NO_x and CO CEMS required by Permit Conditions 4.10 and 4.11. Each test protocol shall be submitted to DEQ for approval at least 30 days prior to the respective test date. Alternately, the permittee may waive this reporting requirement by providing a certified statement that each recertification test will be performed in the same manner as the previously approved test protocols.

[PTC No. P-050002, 6/21/05]

4.15 All CEMS data submitted to EPA or DEQ shall meet the quality assurance procedures in 40 CFR 60, Appendix F.

[PTC No. P-050002, 6/21/05]

4.16 The results of any RATAs conducted for compliance shall be submitted to DEQ within 60 days of the completion of the test.

[PTC No. P-050002, 6/21/05]

4.17 The permittee shall fully comply with the reporting requirements set forth in 40 CFR 75, Subpart G. In accordance with 40 CFR 75.60(b)(2), copies of all certification or recertification notifications, certification or recertification applications, and monitoring plans shall be submitted to DEQ. The copies shall be submitted to DEQ no later than the respective date specified in 40 CFR 75, Subpart G, for submission to the EPA Administrator. Electronic archives are an acceptable form of documentation for recordkeeping.

[40 CFR 75.60; PTC No. P-050002, 6/21/05]

4.18 In addition, the permittee shall submit a written report (including all raw field data, etc.) to DEQ for each certification or recertification test required in accordance with Permit Condition 4.13. Each report shall be submitted to DEQ within 60 days of the date on which the respective test was completed.

[PTC No. P-050002, 6/21/05]

4.19 For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions of NO_x that shall be reported are defined as any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in 40 CFR 60.8. Each report shall include the average fuel consumption, ambient conditions, gas turbine load, nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

[40 CFR 60.335; PTC No. P-050002, 6/21/05]

4.20 The permittee shall submit a report of all excess emissions of SO_2 to DEQ in accordance with 40 CFR 60.7(b) through (d). For this report, excess SO_2 emissions are defined in 40 CFR 60.334(c)(2) as any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight.

[40 CFR 60.334(c); PTC No. P-050002, 6/21/05]

5 Emissions Unit No. 2 – Fuel Heater

Summary Description

Table 5.1 describes the devices used to control emissions from the fuel heater.

Table 5.1 Emissions Unit and Control Device

Emissions Unit / Process	Control Device
Fuel heater	None

Table 5.2 contains only a summary of the requirements that apply to the fuel heater. Specific permit requirements are listed below Table 5.2.

Table 5.2 Applicable Requirements Summary

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
5.1	NO_x, CO	0.84 T/yr and 0.71 T/yr, respectively	P-050002	5.4
5.2	PM	0.015 gr/dscf at 3% O_2	P-050002	5.3
5.3	Fuel restrictions	Natural gas with sulfur content not to exceed 0.02 gr/dscf	P-050002	5.3
5.4	Combustion rate	Not to exceed 16,878,613 cubic feet in any consecutive 12-month period	P-050002	5.5

Permit Limits / Standard Summary

5.1 The NO_x and CO emissions from the fuel heater stack shall not exceed any corresponding emissions rate limits listed in Table 5.3.

Table 5.3 Fuel Heater Emissions Limits [(a)]

Source Description	NO_x	CO
	T/yr	T/yr
Fuel Heater	0.84	0.71

[(a)] The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

[PTC No. P-050002, 6/21/05]

5.2 Emissions of PM from the fuel heater shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when fired with natural gas, as required by IDAPA 58.01.01.676.

[PTC No. P-050002, 6/21/05]

Operating Requirements

5.3 The fuel heater shall be fired exclusively by natural gas. The natural gas burned in the fuel heater shall not contain sulfur in excess of 0.02 gr/dscf of natural gas.

[PTC No. P-050002, 6/21/05]

5.4 The volume of natural gas combusted in the fuel heater shall not exceed 16,878,613 cubic feet in any consecutive 12-month period.

[PTC No. P-050002, 6/21/05]

Monitoring and Recordkeeping Requirements

5.5 A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request. The permittee shall monitor and record the following information:

- The total volume of natural gas combusted in the fuel heater in standard cubic feet per calendar month.
- The total volume of natural gas combusted in the fuel heater in standard cubic feet per any consecutive 12-month period.

[PTC No. P-050002, 6/21/05]

6 Emissions Units No. 3 – Emergency Diesel Generator

Summary Description

Table 6.1 describes the devices used to control emissions from the emergency diesel generator. The generator was issued an exemption from the requirement to obtain a permit to construct, No. X-2008.0196, on December 29, 2008, based on the following information:

- Emergency standby IC engine
- Operated on No. 2 diesel
- Operating hours not to exceed 500 hours per year
- Manufacturer: Cummins
- Engine model: QSX15-G9 Nonroad 2
- Genset model: 350DFEG
- Maximum rating: 755 bhp and 350 kW
- Manufacture date: 2007
- Fuel: diesel

Table 6.1 Emissions Unit and Control Device

Emissions Unit / Process	Control Device
Emergency diesel generator	None

Table 6.2 contains only a summary of the requirements that apply to the emergency diesel generator. Specific permit requirements are listed below Table 6.2.

Table 6.2 Applicable Requirements Summary

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
6.1	Emission Standards	$NMHC + NO_x$ CO PM	40 CFR 60.4205, 40 CFR 60.4206, 40 CFR 60.4209, 40 CFR 60.4211, 40 CFR 60.4212, 40 CFR 60.4214	6.1, 6.5–6.7, 3.23
6.2	Fuel specifications	Nonroad diesel only	40 CFR 60.4207 and 40 CFR 80.510(b)	6.2
6.3	Operation and maintenance	Maintain equipment	40 CFR 60.4211	3.23
6.4	Operating hours	50 hours non-emergency, 100 hours total, per year	40 CFR 60.4209, 40 CFR 60.4211(f) 40 CFR 60.4214,	3.23

Permit Limits / Standard Summary

6.1 NSPS 40 CFR 60, Subpart IIII – Emission Standards for the Emergency Diesel Generator

The permittee shall comply with the emission standards for new nonroad compression ignition (CI) engines in 40 CFR 60.4202 for the emergency diesel generator, for all pollutants, in accordance with 40 CFR 60.4205(b).

[40 CFR 60.4205(b)]

Operating Requirements

6.2 NSPS 40 CFR 60, Subpart IIII – Fuel Specifications

The permittee shall use diesel fuel that meets the requirements of 40 CFR 80.510(b), in accordance with 40 CFR 60.4207.

- All nonroad diesel fuel is subject to the following per-gallon standards:
  - 15 parts per million by weight (ppmw) maximum sulfur content.
  - Minimum cetane index of 40, or maximum aromatic content of 35 volume percent.

[40 CFR 60.4207; 40 CFR 80.510(b)]

6.3 NSPS 40 CFR 60, Subpart IIII – Compliance Requirements

The permittee shall operate and maintain the emergency diesel generator and control devices according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer, in accordance with 40 CFR 60.4211(a). In addition, the permittee may only change those settings that are permitted by the manufacturer. The permittee shall also meet the requirements of 40 CFR parts 89, 94 and/or 1068, as applicable.

The permittee shall comply by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b) or (c), as applicable, for the same model year and maximum (or in the case of fire pump engines, National Fire Protection Association nameplate) engine power, in accordance with 40 CFR 60.4211(c). The engine shall be installed and configured according to the manufacturer's specifications.

[40 CFR 60.4211(a)]

6.4 NSPS 40 CFR 60, Subpart IIII – Operating Hour Requirements

In accordance with 40 CFR 60.4211(f), the emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. 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 ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in 40 CFR 60 Subpart IIII, is prohibited.

[40 CFR 60.4211(f)]

6.5 NSPS 40 CFR 60, Subpart IIII – Operating and Maintenance Requirements

The permittee shall operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4205according to the manufacturer's written instructions or procedures developed by the permittee that are approved by the engine manufacturer, over the entire life of the engine, in accordance with 40 CFR 60.4206.

[40 CFR 60.4206]

6.6 NSPS 40 CFR 60, Subpart IIII – Monitoring Requirements

The permittee shall meet the requirements of 40 CFR 60.4209, 40 CFR 60.4211, and 40 CFR 60.4214.

- The permittee shall install a non-resettable hour meter on the emergency diesel generator, prior to startup of each engine.

[40 CFR 60.4209; 40 CFR 60.4214]

6.7 NSPS 40 CFR 60, Subpart IIII – Testing Requirements

If performance tests are conducted pursuant to 40 CFR 60, Subpart IIII, the permittee shall do so according to 40 CFR 60.4212(a) through (d), in accordance with 40 CFR 60.4212 and using the methodologies provided in 40 CFR 60.4212.

[40 CFR 60.4212]

7 Insignificant Activities

7.1 Table 7.1 lists the units or activities that are insignificant on the basis of size or production rate as provided by the permittee. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b. There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions

Table 7.1 Insignificant Activities

Description	Insignificant Activities IDAPA 58.01.01.317.01.b.i Citation
Operation, loading and unloading of volatile organic compound storage tanks, ten thousand (10,000) gallons capacity or less, with lids or other appropriate closure, vp not greater than eighty (80) mm Hg at twenty-one (21) degrees C.	IDAPA 58.01.01.317.01.b.i(3)
Operation, loading and unloading of gasoline storage tanks, ten thousand (10,000) gallons capacity or less, with lids or other appropriate closure.	IDAPA 58.01.01.317.01.b.i(3)
Welding using not more than one (1) ton per day of welding rod.	IDAPA 58.01.01.317.01.b.i(9)
Surface coating, using less than two (2) gallons per day.	IDAPA 58.01.01.317.01.b.i(17)
Cleaning and stripping activities and equipment, using solutions having less than one percent (1%) volatile organic compounds by weight.	IDAPA 58.01.01.317.01.b.i(26)

[IDAPA 58.01.01.317.01(b)(i), 5/3/03]

8 Title IV Acid Rain Permit

Statement of Basis

8.1 In accordance with IDAPA 58.01.01 (Rules for the Control of Air Pollution in Idaho) and Titles IV and V of the Clean Air Act, DEQ issues this permit pursuant to IDAPA 58.01.01.300.

[40 CFR 72.64]

Sulfur Dioxide Allowance Allocations and Nitrogen Oxides Requirements

8.2 The permittee is required to obtain SO_2 allowances, after deductions under 40 CFR 73.34(c), not less than the total annual emissions of SO_2 for the previous calendar year from the unit, in accordance with 40 CFR 72.9(c). The source is not subject to NO_x emission limitations under 40 CFR Part 76. In addition, the following requirements apply:

- Emissions from the facility shall not exceed any allowances that the source lawfully holds.
- No limit is placed on the number of allowances held by the source and no permit revisions shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided such increases do not require a permit revision under any other applicable requirement.
- The source may not, however, use allowances as a defense for noncompliance with any other applicable requirement.
- Any such allowance shall be accounted for according to the procedures established in 40 CFR Part 72 and 40 CFR Part 73.

[40 CFR 72.9(c), 72.40(a), 72.50(a)(2), 72.50(a)(3), 76.1; IDAPA 58.01.01.322.12, 3/23/98]

Comments, Notes, and Justifications

8.3 The Phase II Acid Rain Permit incorporates by reference the definitions and terms of 40 CFR 72.2.

[40 CFR 72.50(b)]

Compliance with Permit Application

8.4 The permittee shall comply with the standard requirements and special provisions set forth in the EPA Phase II Acid Rain Permit Application, signed and dated July 8, 2016.

[40 CFR 72.9, 72.31(d), 72.50(a)(1)]

Permit Application

8.5 A copy of the Phase II Acid Rain Permit application is contained in the appendix of this Tier I operating permit.

[IDAPA 58.01.01.322.12, 5/1/94; 40 CFR 72.9]

9 General Provisions

General Compliance

9.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

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

9.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

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

9.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

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

Reopening

9.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[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)]

9.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

Property Rights

9.6 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

9.7 The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request 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)]

9.8 Upon request, the permittee shall 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

9.9 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.

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

Changes Requiring Permit Revision or Notice

9.10 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 shall 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); 40 CFR 70.7(d), (e)]

9.11 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 Clean Air Act (CAA), 42 United States Code (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, 4/5/00; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14), (15)]

Federal and State Enforceability

9.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1), (2)]

9.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

9.14 Upon presentation of credentials, the permittee 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

9.15 The permittee shall comply with applicable requirements that become effective during the permit term 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

9.16 The permittee 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

9.17 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

9.18 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 permittee 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)]

9.19 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

9.20 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 a permittee 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, 5/1/94; IDAPA 58.01.01.325, 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

9.21 The permittee shall comply with the following:

- 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

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

- The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
  - The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
  - Such information as DEQ may require to determine the compliance status of the emissions unit.

9.23 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

9.24 No person shall knowingly 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

9.25 No person shall knowingly 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

9.26 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. The permittee's semiannual reporting periods shall be from January 1 to June 30 to and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[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

9.27 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130–136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[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

9.28 No permit revision shall 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

9.29 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)]

Appendix

Acid Rain Permit Application

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 11/30/2012

Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: ☐ New ☐ Revised ☒ for ARP permit renewal

STEP 1

Identify the facility name, State, and plant (ORIS) code.

Facility (Source) Name	State	Plant Code
Bennett Mountain Power Plant	Idaho	55733

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a."

a	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
CT01	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

Permit Requirements

STEP 3

Read the standard requirements.

(1) The designated representative of each affected source and each affected unit at the source shall:

(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and

(ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:

(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and

(ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:

(i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and

(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:

(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or

(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission

of a new certificate of representation changing the designated representative;

STEP 3, Cont'd.

Recordkeeping and Reporting Requirements, Cont'd.

(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:
(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with

any other provision of the Act, including the provisions of title I of the Act relating

STEP 3, Cont'd.

Effect on Other Authorities, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a source can hold; *provided,* that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4
Read the certification statement, sign, and date.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Mike Williams	
Signature	Date 7/8/2016