



Air Quality Permitting Response to Public Comments

March 8, 2017

Tier I Operating Permit No. T1-2016.0023

Project No. 61703

**Avista Corporation
Rathdrum, Idaho**

Facility ID No. 055-00040

Prepared by:
Morrie Lewis, Permit Writer
AIR QUALITY DIVISION

A handwritten signature in black ink, appearing to be "ML", is written over the text "Permit Writer".

Final

Table of Contents

BACKGROUND	3
PUBLIC COMMENTS AND RESPONSES.....	3
APPENDIX.....	5

BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the draft Tier I operating permit to Avista Corporation from December 12, 2016 through January 11, 2017, in accordance with IDAPA 58.01.01.364. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the draft permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the draft permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho (Rules) can be found at: adminrules.idaho.gov/rules/current/58/0101.pdf.

Comment 1:

We request a specific list of permits prioritized ahead of the application for this facility.

Response 1:

DEQ does not maintain a priority listing for projects, and typically processes applications as they are received and within regulatory timeframes. Projects are backlogged only under unusual circumstances, as in this instance when project workload exceeded permit program staffing resources. Processing of this permitting action was prolonged to ensure that this project was given the attention and resources necessary to ensure proper technical review and processing outside of missed regulatory deadlines in accordance with the Rules.

Comment 2:

DEQ is obligated to reevaluate and analyze the permit renewal in light of new facts, conditions, and legal standards. Why does the application and draft permit rely on emissions data from the manufacturer at the time of installation in 1994, when CEM or more recent data may be available.

Response 2:

DEQ does review new and revised regulations for applicability, whether promulgated during the permit term or otherwise. An applicability review is also required of the applicant (Section 5 of the application and Appendix A – Form FRA). DEQ believes that all applicable emission limits and standards, and sufficient monitoring, recordkeeping, reporting, and testing requirements to ensure compliance with the terms and conditions of the permit have been included in the Tier I operating permit in accordance with IDAPA 58.01.01.322. DEQ believes that emissions in the application reflect maximum annual emission rates, and have been sufficiently quantified to make all necessary regulatory determinations in accordance with IDAPA 58.01.01.314.

An inventory of potential emissions and hazardous air pollutants is required for Tier I applications, using the best available emission information. Although CEM data may accurately represent actual emissions for the timeframe analyzed, other data is also acceptable as provided in DEQ's Guidance on Emissions Data Hierarchy. Additional information regarding the requirements for emission inventories can be found on DEQ's website: www.deq.idaho.gov/permitting/air-quality-permitting/emission-inventories.

Comment 3:

We have concerns regarding excess emissions during startup and shutdown. Specific data indicating the exact amount of excess emissions generated during startup and shutdown were not included in the application.

Response 3:

The excess emission events cited in the application relate to brief 10-minute periods during startup and shutdown, and the applicant has taken steps outlined in the application (Section 3.5) to minimize the potential for excess emission events. DEQ has reviewed the excess emission events and the steps implemented, and the nature and frequency of excess emission events do not warrant establishing new emission limits or revising existing monitoring, recordkeeping, reporting, and testing requirements at this time.

DEQ agrees that including additional explanation and data concerning excess emission events in the Tier I application would be beneficial to understanding the nature of these events. Such information is provided to DEQ in accordance with excess emissions notification requirements under IDAPA 58.01.01.130-136. The nature and frequency of excess emission events are reviewed by DEQ when monitoring, recordkeeping, reporting, and testing requirements are established or revised in Tier I permit renewals.

Additional information on specific excess emission events can be requested via the DEQ online public records request form at www.deq.idaho.gov/contact-us/public-records-request/online-prr-request-form.

Appendix

Public Comments Submitted for

Tier I Operating Permit No.

T1-2016.0023 Project No. 61703



208.265.9565 • PO Box 2308, Sandpoint, ID 83864 • www.idahoconservation.org

1/11/2017

Anne Drier
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Submitted via email: anne.drier@deq.idaho.gov

RE: Draft Tier I air quality operating permit renewal, Avista Corp., Rathdrum

Dear Ms. Drier:

Thank you for the opportunity to comment on the draft Tier I air quality operating permit renewal for Avista Corporation, Rathdrum. Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

In general, we are concerned that the application and draft permit require further review and consideration by DEQ. We also believe the facility under consideration must provide more specific data regarding excess emissions at the startup and shutdown phase of turbine operations. These concerns are presented in greater detail in the comments below.

Thank you for your time and consideration. Please do not hesitate to contact me at (208) 265-9565 or mnykiel@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely

A handwritten signature in blue ink that reads "Matthew Nykiel".

Matthew Nykiel
Conservation Associate

RE: Idaho Conservation League comments re Draft Tier I air quality permit renewal, Avista Corp., Rathdrum

Page 1 of 3

As an initial matter, we were disappointed to learn that DEQ was unable to give the Permittee's permit renewal application the attention it deserved. Public records indicate that the Permittee's application was determined complete by default. It appears this determination was the result of a backlog of applications, and DEQ was simply unable to process the Permittee's application before the regulatory deadline. This is particularly unfortunate considering that if this facility were to emit pollutants at its maximum potential output, the facility would have ranked in 2014 as the second greatest emitter of NO_x and CO in Idaho's ten northern counties.¹ In light of this, we request DEQ provide a specific list of permits that DEQ prioritized ahead of the application for this facility, during the regulatory period DEQ had to make a completeness determination under IDAPA 58.01.01.361.02. If DEQ declines this request, we request an explanation for DEQ's decision.

Understanding that the Permittee's application was determined complete by default, we want to ensure that the draft permit was not similarly neglected. Unfortunately, it is not clear that this is case. The draft permit and statement of basis are largely carbon copies of the draft permit and statement of basis issued in 2011. To be fair, the Permittee did not request any changes to the current permit, besides changes to the quarterly facility-wide inspection in Section 3.8, which the Permittee requested in a comment on the draft permit.² But just because the Permittee wants to renew the exact same permit does not negate the obligation to reevaluate and analyze the permit renewal application in light of new facts, conditions, and legal standards.

There are many ways facts and conditions may have changed since the last permit was granted. For example, on page 12 of the Permittee's current application for permit renewal, the Permittee states that the estimates for hourly emission rates of criteria pollutants are based on the turbine manufacturer's emission data, in Appendix B. The document in Appendix B appears to contain emissions data from 1994, when both turbines were installed at this facility. It begs the question: With over twenty years of use, do these turbines still emit pollutants at the same levels? Typically, wear and tear cause mechanical devices to become less efficient. Is that the case with these turbines? We simply don't know. Moreover, why do the application and draft permit rely on data from the manufacturer's estimates at the time of installation in 1994, when there exists CEM data for at least two of the criteria pollutants, NO_x and CO? We request that DEQ require the Permittee to resubmit its application with current emissions data based on actual monitoring, rather than the manufacturer's estimates. Furthermore, we request that DEQ require the publication of this data in the permit for renewal. Lastly, we request that DEQ reevaluate the draft permit and make changes, as needed, based on current emissions data. If DEQ declines these requests, we request an explanation for DEQ's decision.

¹ Emissions data referenced from DEQ's 2014 Emissions Inventory.

² We request that, in the future, DEQ require permittees to request changes within permit applications upfront, rather than on the backend, in comments.

RE: Idaho Conservation League comments re Draft Tier I air quality permit renewal, Avista Corp., Rathdrum

Page 2 of 3

Finally, we have several concerns regarding the facility's excess emissions during startup and shutdown. At Section 3.5 of the Permittee's application, the Permittee states that it has recorded excess emissions from its two turbines during the startup and shutdown stages of operation. Although the Permittee claims to have included these excesses in the Permittee's calculations of annual emissions, the Permittee provided no specific data indicating the exact amount of excess emissions generated during startup and shutdown. To ensure that the Permittee is accurately incorporating excess emissions into its annual emissions and to fully understand the emissions rate, we request DEQ require the Permittee to resubmit its application with numerical data showing the greatest rate of excess emissions during startup and shutdown and the rate of emissions at normal operating levels. We also request that DEQ require the publication of this data in the permit for renewal. If DEQ declines these requests, we request an explanation for DEQ's decision.

RE: Idaho Conservation League comments re Draft Tier I air quality permit renewal, Avista Corp., Rathdrum

Page 3 of 3