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By Jim Hollenbeck

Morrie Lewis
Permit Writer
Air Quality Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706

Email address: Morrie.Lewis@deq.idaho.gov

Re: Facility ID No. 075-00012, Langley Gulch Power Plant, New Plymouth
Tier I Permit Application Supplemental Information

Dear Mr. Lewis:

Idaho Power Company (IPC) submitted a Tier I Operating Permit Application to IDEQ on March 11, 2013. IPC received your letter dated March 20, 2013, requesting additional information to determine our Tier I Permit Application (Tier I Application) complete. That letter also requested IPC to provide a Permit-to-Construct (PTC) applicability determination analysis for the equipment changes to Table 2 of the PTC, along with minor changes proposed for review under the Tier I Application. On April 3, 2013, IPC submitted a letter titled Tier I Permit Application Supplement requesting an extension until April 30, 2013 to submit the information.

This submittal contains the requested Permit-to-Construct Exemption Analysis, and electronic copies of: the Langley Gulch Operation and Maintenance (O&M) manual, Quality Assurance and Quality Control (QA/QC) plans and procedures, and a high resolution facility plot-plan.

In addition to the Plot Plan, O&M and QA/QC plans, IDEQ requested information regarding data correlating conductivity measurements and total dissolved solids in the cooling water to support changing the compliance demonstration method used at the site, per IPC's March 11, 2013 application. However at this time, IPC would like to rescind the request to change the compliance demonstration requirement per PTC condition 91, and will continue to monitor TDS daily as required by the PTC. As a result, no TDS or conductivity information has been included with this submittal.

All changes that IPC is requesting to be included in the review of the Tier I application have been included in the Permit to Construct Exemption Analysis document. This PTC Exemption Analysis demonstrates that the proposed changes in the permit conditions meet both the General and Category I PTC exemption criteria in IDAPA 58.01.01.220-221. As a result, we believe these minor revisions requested by IPC do not trigger additional PTC review and can be processed by the Department as a revision to the PTC (IDAPA 58.01.01.209.04) in parallel with review of the Tier I Operating Permit Application.

1221 W. Idaho St. (83702)
P.O. Box 70
Boise, ID 83707

IPC regrets any confusion or inconvenience caused by the omission of this information from the Tier I Application. IPC is committed to cooperating with the IDEQ to obtain a thorough review and adequate Tier I permit for the Langley Gulch Power Plant.

If you have any questions, please contact Trevor Mahlum at (208) 388-2426 or tmahlum@idahopower.com.

Based upon information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete.

Sincerely,

Dale Koger

Dale Koger
Manager, Power Production
Tier I Responsible Official

cc: Trevor Mahlum, IPC

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Idaho Power Company
Langley Gulch Combined Cycle Plant

Permit to Construct Exemption Analysis for IDEQ Facility Number 075-00012

April 30, 2013

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3. Executive Summary

This analysis is submitted by Idaho Power Company (IPC) to support modifying several Permit-to-construct (PTC) conditions in the PTC No. 2009.0092 for the Idaho Power's Langley Gulch Power Plant (Langley Gulch). This PTC exemption analysis demonstrates that the proposed changes in permit conditions meet both the General and Category I PTC exemption criteria in IDAPA 58.01.01.220-223.

4. Purpose and Background

Langley Gulch received its PTC on June 25, 2010 and began operation of the plant on April 13, 2012. Following commencement of operation of the plant, several small inconsistencies between the PTC and installed equipment or actual operations were identified by IPC. Representatives of IPC communicated with the Department and determined to address the minor revisions during review of the plant's Tier I Operating Permit Application in 2013. IPC submitted a timely Tier I Operating Permit Application to IDEQ on March 11, 2013 that identified changes to certain equipment manufacturer details and emission rates for incorporation into the new Tier I Permit. IPC did not submit an associated PTC applicability analysis to support amending the underlying PTC No. 2009.0092 to reflect the installed equipment nameplate information, calculated emission rates, cooling tower flow rates, and other minor revisions described in Section 4.2. This PTC applicability analysis confirms that the minor revisions requested by IPC do not trigger additional PTC review and can be processed by the Department as a revision to the PTC (IDAPA 58.01.01.209.04) in parallel with review of the Tier I Operating Permit Application.

4.1. General Information

Facility:	Langley Gulch Power Plant 3806 Highway 30 South New Plymouth, ID 83655
Owner/Operator:	Idaho Power Company 1221 W. Idaho St. Boise, ID 83702
Responsible Official:	Dale Koger Power Production Manager (208) 388-5820
Facility Contact:	Trevor Mahlum Maintenance Leader (208) 388-2426

The Langley Gulch Project is identified by the following codes and classifications:

- Standard Industrial Classification (SIC): 4911
- North American Industry Classification System (NAICS): 221112
- Idaho Department of Environmental Quality, Facility ID: 075-00012
- Environmental Protection Agency Facility ID (ORISPL): 57028

Questions or comments regarding this request should be sent to:

Trevor Mahlum
Idaho Power Company -- Maintenance Leader
1221 W Idaho Street
Boise, Idaho 83702
Phone: (208) 388-2426
Fax: (208) 388-6689
E-mail: tmahlum@idahopower.com

4.2. Requested Changes to the Permit-to-construct

IPC evaluated the following specific changes to the PTC to determine if a new PTC was required to reflect minor changes in design or operation, to update nameplate information, and to incorporate administrative changes that simplify monitoring or operation of the facility:

4.2.1. Update Facility Nameplate Information (Re: PTC Condition No. 2)

During construction of the plant certain equipment information changed creating inconsistencies between the information presented in the PTC and the actual specifications of installed equipment. IPC requests that the Department address these changes, so that the new Tier I Operating Permit includes accurate information to reflect the equipment in place. In most cases, the information does not impact emissions from the plant. Any increases in emissions associated with these changes are outlined in Section 5 below.

4.2.1.1. Update Facility Nameplate Information – Emergency Diesel Generator (Re: PTC Condition No. 2)

A 750 kilowatt (kW) Caterpillar diesel fired generator is installed at the facility for operation of emergency systems. This engine driver is rated at 1,214 horsepower (bhp) at full load. The generator is certified to the EPA Tier 2 emission standard as specified in the BACT analysis. A copy of the EPA Certificate of Conformity for this engine has been attached in Appendix 1 for reference. In addition to being a Tier II EPA Certified Engine, good combustion practices have been implemented for this equipment, as detailed in the facility's O&M plan. The generator use is limited to a maximum of 4 hours per day and 60 hours per year for maintenance and testing

activities, and a non-resettable hour meter is connected to the generator to log hours of use. Potential emission estimates are based on these self-imposed limits. The generator operates exclusively on ultra low sulfur diesel (ULSD, 0.0015% sulfur or less) fuel.

Although the engine horsepower requirement for the Caterpillar engine (1214 bhp) that was installed during construction is slightly higher than the Cummins engine listed in the Original PTC (1102 bhp), the electric generator connected is functionally equivalent to the generator output listed in the PTC because each have a nominal output of 750 kW of electric capacity. The emergency generator installed consists of a 12 cylinder engine with a displacement of 27 liters (L). Therefore, the total displacement per cylinder is equal to 2.25 L/cylinder. Estimated emissions from the change in nameplate capacity (bhp) are included in the facility wide emission calculations in Section 5 below.

Table 1 outlines revisions requested to PTC Condition No. 2 to ensure the PTC accurately reflects the equipment that is installed and operating at the facility[1].

Table 1: Installed Emergency Diesel Generator Engine

	PTC	Installed Equipment
Manufacturer	Cummins	Caterpillar
Model	DQFAA	C27
Manufacture Date	2009	2011
Max Capacity	1102 BHP (750 kWe nominal)	1214 BHP (750 kWe nominal)
	2.54 l/cyl	2.25 l/cyl
Max Operation	4hr/day, 60 hr/yr	4hr/day, 60 hr/yr
Fuel	diesel	diesel
Fuel Consumption	51.3 gal/hr	53.6 gal/hr
Tier Rating	Tier II	Tier II
Exhaust Temp (F)[a]	816	948.7
Exhaust Flow (acfm)[a]	6310	5611.5

a). Included for IDEQ reference information only. IPC is not requesting to include these values in the PTC at this time.

4.2.1.2. Update Facility Nameplate Information – Emergency Fire Pump Engine (Re: PTC Condition No. 2)

[1] The Emergency Diesel Generator location has moved from the location provided in the PTC application. The installed equipment location is 4861178.81 UTM N, 514561.03 UTM E. The location contained in the original PTC application was 4861194.607 UTM N, 514572.744 UTM E.

A 235 kW Cummins diesel fire pump is installed at the facility to supply an emergency fire water system. The fire pump power rating is 305 brake horsepower (bhp). The fire pump is certified to the EPA Tier III standards and meets the emission requirements as specified in the BACT analysis. A copy of the EPA Certificate of Conformity for this engine has been attached in Appendix 1 for reference. In addition to being a Tier III EPA Certified Engine, good combustion practices have been implemented for this equipment, as detailed in the facility's O&M plan. The fire pump use is limited to a maximum of 1 hour per day and 30 hours per year for maintenance and testing activities, however, IPC is requesting to increase the annual use to 40 hours per year in this request (See Section 4.2.4). A non-resettable hour meter is connected to the generator to log hours of use. Potential emission estimates are based on these self-imposed limits. The fire pump operates exclusively on ULSD fuel.

Although the engine horsepower requirement for the Cummins engine (305 bhp) that was installed during construction is slightly lower than the John Deere engine listed in the PTC (315 bhp), the unit capacity is functionally equivalent to the capacity listed in the PTC. The emergency fire pump consists of a 6 cylinder engine with a displacement of 9 L. Therefore, the total displacement per cylinder is equal to 1.48 L/cylinder. Estimated emissions from the change in operating hours, and nameplate capacity (bhp) are included in the facility wide emission calculations in Section 5 below.

Table 2 outlines the revisions requested to PTC Condition No. 2 to ensure the PTC accurately reflects the equipment that is installed and operating at the facility.

Table 2: Installed Fire Pump Engine

	PTC	Installed Equipment
Manufacturer	John Deere	Cummins
Model	JU6H-UFAD98	CFP9E-F30
Manufacture Date	2009	2010
Max Capacity	315 bhp	305 bhp
	1.14 l/cyl, 1760 rpm	1.48 l/cyl, 1760 RPM
Max Operation	1hr/day, 30 hr/yr	2hr/day, 40 hr/yr
Fuel	diesel	diesel
Fuel Consumption	15 gal/hr	15.8 gal/hr
Tier Rating	Tier III	Tier III
Exhaust Temp (F)[a]	961	1057
Exhaust Flow (acfm)[a]	1400	1863

a). Included for IDEQ reference information only. IPC is not requesting to include these values in the PTC at this time.

4.2.1.3. Update Facility Nameplate Information – Cooling Tower (Re: PTC Condition No. 2)

The power plant produces waste heat as a byproduct of the useful electrical energy produced. A forced draft wet cooling tower releases the waste heat to the ambient atmosphere by the evaporation of water. In accordance with the BACT requirements for the facility (4/2/2010), and the facility's O&M Plan, drift eliminators have been installed on the wet cooling towers with a drift rate of 0.0005 percent. As noted in Section 4.2.5, IPC is requesting to increase the cooling tower circulation rate to 76,151 gpm to utilize the full capacity of the cooling tower circulation pumps and thereby increase the availability of the facility during seasonal conditions. Estimated emissions from the change in nameplate capacity (flow rate) are included in the facility wide emission calculations in Section 5 below.

Table 3 outlines revisions requested to ensure the PTC accurately reflects the equipment that is installed and operating at the facility.

Table 3: Installed Cooling Tower

	PTC	Installed Equipment
Max Water Flow	63,200 gpm	76,151 gpm
Max TDS	5,000 ppm	5,000 ppm

4.2.1.4. Update Facility Nameplate Information – Dry Chemical Storage Silos (Re: PTC Condition No. 2)

The water treatment process requires the use of lime, magnesium oxide, and soda ash for removing suspended solids in the cooling water. These chemicals are stored onsite in bulk storage silos[2]. During chemical loading operations small amounts of PM emissions can occur. As determined by the facility BACT requirements, the silo vents are equipped with filter media to limit the amount of PM emissions during the loading operation. In addition, the facility utilizes good operating practices to control particulate emissions during the loading process. Estimated emissions from the loading events are included in the facility wide emission calculations.

In addition to changing the size of the silo's, IPC is also requesting to increase the loading duration to 48 hours per year with this request. As a result of installing fewer dry chemical silo's at the site IPC will be required to fill the silo's more frequently to maintain operation of the facility. Estimated emissions from the loading events are included in the facility wide emission calculations.

[2] Dry Chemical Storage Silo locations have moved from the locations provided in the PTC application. The installed equipment locations are: Lime Silo 4861038.41 UTM N, 514557.39 UTM E, Magnesium Oxide 4861034.03 UTM N, 514561.84 UTM E, Soda Ash 4861029.54 UTM N, 514570.73 UTM E. The locations contained in the original PTC Application were Silo 1 - 4861013.42 UTM N 514586.22 UTM E, Silo 2 – 4861017.1 UTM N 514589.86 UTM E, Silo 3 – 4861009.78 UTM N 514589.91 UTM E, Silo 4 – 4861013.47 UTM N 514593.55 UTM E, Silo 5 – 4861006.14 UTM N 514593.6 UTM E, Silo 6 – 4861009.83 UTM N 514597.23 UTM E.

Table 4 outlines revisions requested to PTC Condition No. 2 to ensure the PTC accurately reflects the equipment that is installed and operating at the facility.

Table 4: Installed Dry Chemical Storage Silos

	PTC	Installed Equipment
No of Silos	6	3
Manufacturer	Seneca	Chemco
Mfg Date	2010	2010
Max Capacity	4,072 ft^3 each	6,500 ft^3(silo 1); 2,200 ft^3 (Silo 2); 2,090 ft^3 (Silo 3)
Max Loading Operation	2 hr/day; 24 hr/yr per silo	2hr/day (per silo); 48 hr/yr (per silo)
Stack height (ft)	36	Lime (silo 1)= 65.4 Soda Ash (silo 2) = 44.6 Magnesium Oxide (silo 3) = 41.3
Stack Dimension	12.5 ft^2	0.31 ft^2
Stack Exit Flowrate (acfm)	1000	1200
Stack Orientation	vertical	vertical

4.2.2. Substitute an Annual Total Fuel Throughput Limit for the Annual Operating Hour Limit. (Re. PTC Condition No. 50, 63)

IPC is requesting PTC Condition No. 50 to be changed to a total fuel throughput limit rather than hours of operation limit. The emission calculations in the original PTC application were based upon the maximum fuel throughput condition at the requested hour limit of 7,884 hr/yr. Limiting hours of operation can constrain operating flexibility, while monitoring the total fuel throughput would provide an equally reliable means of determining total annual emissions and allow IPC some additional flexibility.

In accordance with the requested change to PTC Condition No 50, PTC Condition No. 63 should also be changed from a requirement for reporting hours of operation of the combustion turbine and duct burners to reporting a fuel throughput limit accordingly. Fuel throughput is currently monitored and documented by use of an electronic archive to measure real-time fuel use, and to track for billing purposes. There is no change in emissions associated with this request.

The requested fuel throughput limit of 17,884,268 MMBtu/yr was calculated using the same assumptions as the original PTC application emission estimates; 6,902 hrs of maximum capacity and 982 hours of startup/shutdown (253 hot starts, 45 warm starts, 7 cold starts, and 305 shutdowns). The pounds of fuel used per startup and shutdown event were provided by the turbine manufacturer. The hourly and annual emissions will not increase based on the changed monitoring limit.

$$\left(6902\frac{hr}{yr} * 2375\frac{MMbtu}{hr}\right) + \left(\left(253\frac{event}{yr} * 143{,}157\frac{lb}{event}\right) + \left(45\frac{event}{yr} * 357{,}677\frac{lb}{event}\right) + \left(7\frac{event}{yr} * 396{,}978\frac{lb}{event}\right) + \left(305\frac{event}{yr} * 31{,}136\frac{lb}{event}\right)\right) * \left(\frac{23{,}100\frac{btu}{lb}}{1e6\frac{btu}{MMbtu}}\right) = 17{,}884{,}268\frac{MMbtu}{yr}$$

4.2.3. Remove Exhaust Opacity Requirements from Emergency Generator Engine (Re: PTC Condition No. 75)

Currently, facility-wide opacity is regulated in accordance with PTC Condition 9 (IDAPA 58.01.01.625). However, PTC Condition 75, Bullet 3 also regulates opacity for the Emergency Diesel Generator Engine. To resolve this, IPC is requesting removing the third bullet in PTC Condition 75, which references opacity. In the original PTC application, IPC overlooked 40 CFR §89.113(c) which provides an exemption from the opacity requirements for constant-speed engines. By utilizing the exemption from opacity requirements in 40 CFR §89.113(c), IPC will maintain consistency with the federal and state regulations, and simplify compliance with visible emission requirements at the plant.

There is no change in emissions associated with this request.

4.2.4. Increase the Annual Hours of Operation for the Emergency Diesel Fire Pump (Re: PTC Condition No. 77)

The PTC currently limits the Emergency Fire Pump Engine operation to 30 hours per year. IPC proposes to increase this limit to 40 hours per year to meet the maintenance and testing obligations for the diesel engines. As noted in the facility O&M Plan, the NFPA code for diesel fire pumps states that the engines should be run for 30 minutes, once per week. This would accumulate to 26 hours per year, nearly the current limit for the fire pump. Any additional maintenance and testing will be limited, unless the 30

hr/yr limit is increased. The increase is consistent with 40 CFR 60.4211(f), which states emergency stationary internal combustion engines may be operated for 100 hrs/yr for maintenance checks and readiness testing.

The net change in emissions associated with this request is outlined in Section 5.

4.2.5. Change Cooling Tower Flow Rate Limit (Re: PTC Condition No. 90)

The PTC provides for a cooling tower circulation flow rate of 63,200 gpm based upon expected maximum pump efficiency information, provided to IPC during construction. IPC proposes to increase the circulation flow rate to 76,151 gpm to reflect the installed equipment nameplate capacity. This increase will allow IPC to utilize the full capacity of the cooling tower circulation pumps and thereby increase the availability of the facility during seasonal conditions.

The net change in emissions associated with this request is outlined in Section 5.

4.2.6. Add Facility Equipment - Above ground Fuel Tank, Per PTC Exemption Determination Dated 2/11/13

On Feb 12, 2013 IPC added a dual compartment above ground storage tank (AST) that holds gasoline and diesel fuel at the facility. Each compartment in the AST has a capacity of 250 gallons. Fuel is used for portable and mobile equipment related to maintenance at the facility.

This AST was installed at the facility in accordance with the General and Category I Exemption Criteria outlined in IDAPA 58.01.01.220 and 221. The AST documentation demonstrating compliance with sections 220 and 221 is included in Appendix 2 for reference. IPC would like to use this permit review opportunity to include the AST in the underlying PTC and the new Tier I Operating Permit.

The net change in emissions associated with this request is outlined in Section 5.

5. Emission Source Specifications

This section reviews the emission rates for criteria pollutants and Toxic/HAPs emissions associated with the requested changes incorporated in this evaluation.

5.1. Criteria Pollutants - Existing PTC Emission Rates

Table 5 below presents the potential to emit for criteria pollutants as included in the PTC. The emission rates included in the table below are the emission rates as included in IPC's original PTC Application dated April 2, 2010.

Table 5: Existing Criteria Pollutants Emission Rates

Existing Potential to Emit, Criteria Pollutants[a]

Emissions Units		NO_X		CO		VOC		PM_{10}[b]		$PM_{2.5}$[m]		SO_2		Pb	
		lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]
CT and Duct Burner[d]	peak-load[e]	20.10	88.00	12.24	278.10	7.01	74.90	12.55	49.46	12.55	49.46	3.41	13.44	0.02	0.05
	low-load[f]	452.78		70.35		18.91									
	startup/shutdown[g]	304.56		2510.0		186.60									
emergency generator engine[h]		11.60	0.35	6.30	0.19	0.73	0.02	0.36	0.01	0.36	0.01	0.01	0.00		
fire pump engine[i]		2.10	0.03	1.80	0.03	0.10	0.00	0.10	0.00	0.10	0.00	0.00	0.00		
cooling tower								0.67	2.91	0.67	2.91				
dry chemical storage silos								0.04	0.01	0.04	0.01				
paved roads[l]								0.2	0.01	0.2	0.01				
unpaved roads[l]								0.27	0.01	0.27	0.01				
Facility-Wide Totals		**466.48**	**88.38**	**2518.10**	**278.32**	**187.43**	**74.92**	**14.19**	**52.41**	**14.19**	**52.41**	**3.42**	**13.47**	**0.02**	**0.05**

a). Short-term (lb/hr) and annual (T/yr) emission estimates assume the use of BACT and are based on daily and annual limits on hours of operation.

b). Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c). Tons per any consecutive 12 calendar month period, calculated as a 12 month rolling total.

d). Annual totals assume a maximum of 7,884 hr/yr operation, continuous duct-firing at steady-state, and include 253 hot startup, 45 warm startup, 7 cold startup, and 305 shutdown events per year (equivalent to 982 hr/yr of operation)

e). At steady-state and ≥ 60% of full-load operating conditions.

f). At steady-state and < 60% of full-load operating conditions.

g). At startup of shutdown operating conditions. Emissions were estimated as the total emissions divided by the duration of each event. Annual totals include 253 hot startup, 45 warm startup, 7 cold startup, and 305 shutdown events per year (equivalent to 982 hr/yr of operation).

h). Limited to 4 hr/day and 60 hr/yr operation for maintenance.

i). Limited to 1 hr/day and 30 hr/yr operation for maintenance and testing purposes.

j). Assumes total dissolved solids (TDS) of blowdown of less than or equal to 5,000 ppm and a circulating flow rate of 63,200 gpm.
k). Total emissions from the six (6) dry chemical storage silos. Annual totals assume each silo is loaded for up to 2 hours, 24 hr/yr.
l). Fugitive emission sources.
m). Particulate matter with an aerodynamic diameter less than or equal to a nominal two and a half (2.5) micrometers. $PM_{2.5}$ was not included in the initial PTC application in 2009 because $PM_{2.5}$ was not a regulated pollutant at that time. Although $PM_{2.5}$ emissions were not included in the initial PTC, it was stated in the PTC application that an assumption was made that $PM_{2.5}$ emissions were equal to PM_{10} emissions. In order to adequately address the increase in $PM_{2.5}$ emissions due to the proposed changes, the $PM_{2.5}$ emissions associated with the existing PTC must be established. Therefore, $PM_{2.5}$ emissions were assumed to equal PM_{10} emissions.

5.2. Criteria Pollutants - Proposed PTC Emission Rates

Table 6 below presents the proposed potential to emit for criteria pollutants for the facility for all of the changes included in this request. As noted in the table, the emission rates for the Combustion Turbine and Duct Burner, and Fugitive Emission $PM_{10}/PM_{2.5}$ sources are not being changed as a result of this request.

Table 6: Proposed Criteria Pollutant Emission Rates

Proposed Potential to Emit, Criteria Pollutants[a]																
		NO_X		CO		VOC		PM_{10}[b]		$PM_{2.5}$[b]		SO_2		Pb	
Emissions Units		lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]	lb/hr	T/yr[c]
CT and Duct Burner[d]	peak-load[e]	20.10	88.00	12.24	278.10	7.01	74.90	12.55	49.46	12.55	49.46	3.41	13.44	0.02	0.05
	low-load[f]	452.78		70.35		18.91									
	startup/shutdown[g]	304.56		2510.0		186.60									
emergency generator engine[h,i]		12.80	0.39	7.00	0.21	0.80	0.02	0.40	0.01	0.40	0.01	0.01	0.00		
fire pump engine[j]		2.00	0.03	1.70	0.03	0.10	0.00	0.10	0.00	0.10	0.00	0.00	0.00		
cooling tower[k]								0.81	3.50	0.81	3.50				
dry chemical storage silos[l]								0.13	0.01	0.13	0.01				
above ground storage tank[m]						0.03	0.15								
paved roads[n]								0.2	0.01	0.2	0.01				
unpaved roads[n]								0.27	0.01	0.27	0.01				
Facility-Wide Totals		**467.58**	**88.42**	**2518.70**	**278.35**	**187.53**	**75.07**	**14.46**	**53.00**	**14.46**	**53.00**	**3.42**	**13.47**	**0.02**	**0.05**

a). Short-term (lb/hr) and annual (T/yr) emission estimates assume the use of BACT and are based on daily and annual limits on hours of operation.

b). Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c). Tons per any consecutive 12 calendar month period, calculated as a 12 month rolling total.

d). Annual totals assume a maximum fuel use of17,884,2687 MMBtu/yr, continuous duct-firing at steady-state, and include 253 hot startup, 45 warm startup, 7 cold startup, and 305 shutdown events per year (equivalent to 982 hr/yr of operation)

e). At steady-state and ≥ 60% of full-load operating conditions.

f). At steady-state and < 60% of full-load operating conditions.

g). At startup or shutdown operating conditions. Emissions were estimated as the total emissions divided by the duration of each event. Annual totals include 253 hot startup, 45 warm startup, 7 cold startup, and 305 shutdown events per year (equivalent to 982 hr/yr of operation).

h). Limited to 4 hr/day and 60 hr/yr operation for maintenance.

i). Assumes linear increase in emission rates from PTC emission rate based on incremental unit horsepower increase (1,214 hp / 1,102 hp).

j). Annual emissions proposed to increase to allow 40 hr/yr instead of 30 hr/yr as included in PTC application. Also, assumes a linear decrease in emission rate based on unit horsepower decrease from 315 hp to 305 hp.

k). Assumes total dissolved solids (TDS) of blowdown of less than or equal to 5,000 ppm and a circulating flow rate of 76,151 gpm.

l). Total emissions from the three (3) dry chemical storage silos. Annual totals assume each silo is loaded for up to 2 hours, and 48 hr/yr.

m). Emission rates were determined using the EPA's TANKS program. Assumes both the gasoline and diesel tank are refilled with 250 gallons of fuel (tank capacity) every day with an annual throughput of 91,250 gallons of gasoline and 91,250 gallons of diesel.

n). Fugitive emission sources.

o). Particulate matter with an aerodynamic diameter less than or equal to a nominal two and a half (2.5) micrometers. $PM_{2.5}$ emissions are assumed to equal PM_{10} emissions.

5.3. Criteria Pollutants - Proposed Change in Emission Rates

Table 7 below presents the calculated increase in emission rates associated with the changes outlined in this report. The "Change in Emissions" presented in this table are calculated by subtracting Table 6 "Proposed Emission Rates" with Table 5 "PTC Emission Rates". As noted in Table 7, the Combustion Turbine and Fugitive Emission rates are not changed as a result of this request.

Table 7: Proposed Change in Emission Rates

Proposed Changes in Potential to Emit, Criteria Pollutants[a]

Emissions Units		NO_X		CO		VOC		PM_{10}[b]		$PM_{2.5}$[c]		SO_2		Pb	
		lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
CT and Duct Burner	peak-load	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	low-load	0.00		0.00		0.00									
	startup/shutdown	0.00		0.00		0.00									
emergency generator engine		1.20	0.04	0.70	0.02	0.07	0.00	0.04	0.00	0.04	0.00	0.00	0.00		
fire pump engine		(0.10)	0.00	(0.10)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
cooling towers								0.14	0.59	0.14	0.59				
dry chemical storage silos								0.09	0.00	0.09	0.00				
above ground storage tank						0.03	0.15								
paved roads								0.00	0.00	0.00	0.00				
unpaved roads								0.00	0.00	0.00	0.00				
Facility-Wide Totals		**1.10**	**0.04**	**0.60**	**0.02**	**0.10**	**0.15**	**0.27**	**0.59**	**0.27**	**0.59**	**0.00**	**0.00**	**0.00**	**0.00**

a). All emission rate changes contained in this table were determined by subtracting the emission rates proposed in Table ~~7~~ 6, with the emission rates in Table ~~6~~ 5 of this analysis.

b). Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c). Particulate matter with an aerodynamic diameter less than or equal to a nominal two and a half (2.5) micrometers.

5.4. HAPS/TAPS – Proposed Change in Emission Rates

Table 8 below provides a comparison of the increase in Toxic Air Pollutants (TAP) for the combined action of all of the requested changes included in this request.

Table 8: Proposed Change in HAP/TAP Emissions

Toxic Air Pollutants[a]			
Pollutant	Category	Annual Average [lb/hr]	24-Hour Average [lb/hr]
1,3-Butadiene	HAP / TAP-586	1.96E-08	3.57E-07
Acenaphthene	HAP / TAP-586	1.08E-08	2.59E-07
Acenaphthylene	HAP / TAP-586	2.25E-08	5.31E-07
Acetaldehyde	HAP / TAP-586	4.38E-07	8.33E-06
Acrolein	HAP / TAP-585	6.33E-08	1.26E-06
Anthracene	HAP / TAP-586	3.59E-09	8.17E-08
Benzene	HAP / TAP-586	4.36E-04	4.83E-04
Benzo(a)pyrene	HAP / TAP-586	6.49E-10	1.52E-08
Benzo(g,h,I)perylene	HAP / TAP-586	1.45E-09	3.37E-08
Cyclohexane	HAP / TAP-585	4.57E-05	4.57E-05
Ethyl alcohol	HAP / TAP-585	5.48E-04	5.48E-04
Fluoranthene	HAP / TAP-586	3.81E-09	6.95E-08
Fluorene	HAP / TAP-586	4.22E-08	9.39E-07
Formaldehyde	HAP / TAP-586	7.61E-07	1.49E-05
Naphthalene	TAP-585	3.23E-07	7.60E-06
Phenanthrene	HAP / TAP-586	1.03E-07	2.41E-06
Propylene oxide	HAP / TAP-585	7.31E-06	1.70E-04
Pyrene	HAP / TAP-586	1.04E-08	2.39E-07
Toluene	HAP / TAP-585	2.41E-04	2.58E-04
1,2,4-Trimethylbenzene	HAP / TAP-585	1.03E-05	1.03E-05
Vanadium	TAP-585	5.42E-07	1.27E-05
Xylenes	HAP / TAP-585	4.17E-05	5.38E-05

a). Combined change in HAP/TAPS for: Emergency Diesel Generator, Emergency Diesel Fire Pump, and AST.

6. Increase in Emission Rates Requested are Below Regulatory Concern

This section reviews if the proposed PTC changes cause or contribute to a physical change that results in an emissions increase that, in accordance with IDAPA 58.01.01.220 & 221, is Below Regulatory Concern, and therefore is exempt from a Permit to Construct.

The changes proposed in this request satisfy the general exemption criteria for a Permit to Construct Exemption per IDAPA 58.01.01.220 and the Category I Exemption criteria per IDAPA 58.01.01.221. The activity being exempted includes the combined action of all of the changes included in Section 5 of this report. Applicability for each section in IDAPA 220 and 221 is summarized below.

6.1. IDAPA 58.01.01.220 Applicability –General Exemption Criteria for Permit to Construct Exemptions

***General Exemption Criteria**. Sections 220 through 223 may be used by owners or operators to exempt certain sources from the requirement to obtain a permit to construct. Nothing in these sections shall preclude an owner or operator from choosing to obtain a permit to construct. For purposes of Sections 220 through 223, the term source means the equipment or activity being exempted. For purposes of Sections 220 through 223, fugitive emissions shall not be considered in determining whether a source meets the applicable exemption criteria unless required by federal law. No permit to construct is required for a source that satisfies all of the following criteria, in addition to the criteria set forth at Sections 221 and 223 or 222 and 223 (as required):*

As noted in the following sections, the exemption criteria included in IDAPA 58.01.01.220 are satisfied for the increases in emissions associated with IPC's request.

6.1.1. IDAPA 58.01.01.220.01.a.i. Applicability

The maximum capacity of a source to emit an air pollutant under its physical and operational design without consideration of limitations on emission such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed would not equal or exceed one hundred (100) tons per year of any regulated air pollutant.

Table 9 below, details the maximum emission rate for each source or activity that is requested to have an emission rate change, under its physical and operational design without consideration of limitations on emission such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed. As detailed in Table 9, the total potential to emit for criteria pollutant emissions from the all of the sources requested to change is less than 100 tons per year of any regulated air pollutant. Calculations are based on 8,760 hr of operation per year for each source; even though there are inherent physical and operational restrictions reducing usage on the emergency generator, the fire pump engine, the cooling tower, the storage silos and the AST.

Table 9: Uncontrolled Potential to Emit Criteria Pollutant Emission Rates, 100 ton/year Demonstration

Uncontrolled Potential to Emit Criteria Pollutants[a] for use in Determining Applicability with 220.01.a.i

Emissions Units	NO_X T/yr	CO T/yr	VOC T/yr	PM_{10}[b] T/yr	$PM_{2.5}$[c] T/yr	SO_2 T/yr	Pb T/yr
emergency generator engine[d]	56.06	30.66	3.50	1.75	1.75	0.04	
fire pump engine[e]	8.76	7.45	0.44	0.44	0.44	0.00	
cooling towers[f]				3.55	3.55		
dry chemical storage silos[g]				0.57	0.57		
above ground storage tank[h]			0.15				
Facility-Wide Totals	**64.82**	**38.11**	**4.09**	**6.31**	**6.31**	**0.04**	**0.00**
Threshold[i]	**100**	**100**	**100**	**100**	**100**	**100**	**100**
Is the proposed emission rate assuming uncontrolled, 8760 hr/year use, above 100 Ton/year for any regulated air pollutant?	**No**	**No**	**No**	**No**	**No**	**No**	**No**

a). BACT limit provided in Table 6 in this report used as basis for emissions factor to calculate annual uncontrolled emissions for equipment requesting to change. All annual emission rates assume 8760 hr of operation to determine compliance with IDAPA 58.01.01.220.01; although there are inherent physical and operational restrictions reducing hours and usage on the dry chemical storage silos, the fire pump engine, the cooling towers, and the emergency generator engine, for simplicity in this PTC exemption demonstration, 8,760 hours per year has been used as the maximum capacity in demonstrating no regulated air pollutant equals or exceeds 100 tons per year.

b). Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c). Particulate matter with an aerodynamic diameter less than or equal to a nominal two and a half (2.5) micrometers.

d). Assumes linear increase in emission rates from PTC emission rate based on incremental unit horsepower increase (1,214 hp / 1,102 hp).

e). Assumes linear decrease in emission rates from PTC emission rate based on incremental unit horsepower decrease from 315 hp to 305 hp.

f). Assumes total dissolved solids (TDS) of blowdown of less than or equal to 5,000 ppm and a circulating flow rate of 76,151 gpm.

g). Total emissions from the three (3) dry chemical storage silos. Annual totals assume each silo is loaded continuously, 8760 hr/year.

h). Assumes both the gasoline and diesel tank are filled with 250 gallons of fuel (tank capacity) every day with an annual throughput of 91,250 gallons of gasoline and 91,250 gallons of diesel.

i). Threshold level based on 100 ton/year of any regulated criteria pollutant, per IDAPA 58.01.01.220.01.a.i

6.1.2. IDAPA 58.01.01.220.01.a.ii. Applicability

The maximum capacity of a source to emit an air pollutant under its physical and operational design without consideration of limitations on emission such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed would not cause an increase in the emissions of a major facility that equals or exceeds the significant emissions rates set out in the definition of significant at Section 006.

Table 10 below presents the comparison of the uncontrolled change in criteria pollutant emissions (assuming 8760 hr/year use for all sources with requested changes in emissions), with the significance threshold for each emission source that is requested to have a change in emission rate to determine the applicability with IDAPA 58.01.01.220.01.a.ii. Without considering limitations on emissions such as air pollution control equipment, or restrictions on hours of operation, no criteria pollutant causes an increase in emissions from the major facility that equals or exceeds the significant emissions rates set out in IDAPA 58.01.01.006. Therefore, IDAPA 58.01.01.220.01.a.ii is satisfied.

Table 10: Uncontrolled Increase in Criteria Pollutant Emission Rates, Significance Determination

Uncontrolled Increase in Potential to Emit Criteria Pollutants[a] for use in Determining Applicability of 220.01.a.ii

Emissions Units	NO_X T/yr	CO T/yr	VOC T/yr	PM_{10}[b] T/yr	$PM_{2.5}$[c] T/yr	SO_2 T/yr	Pb T/yr
emergency generator engine[d]	5.26	3.07	0.31	0.18	0.18	0.00	
fire pump engine[e]	(0.44)	(0.44)	0.00	0.00	0.00	0.00	
cooling towers[f]				0.61	0.61		
dry chemical storage silos[g]				0.39	0.39		
above ground storage tank[h]			0.15				
Facility-Wide Totals	**4.82**	**2.63**	**0.46**	**1.18**	**1.18**	**0.00**	**0.00**
Threshold[i]	**40**	**100**	**40**	**15**	**10**	**40**	**0.6**
Is the proposed uncontrolled increase in emissions above the significance threshold provided in IDAPA 58.01.01.06.106?	**No**	**No**	**No**	**No**	**No**	**No**	**No**

a). BACT limit provided in Table 6 in this report used as basis for emissions factor to calculate annual uncontrolled emissions for equipment requesting to change. All annual emission rates assume 8760 hr of operation to determine compliance with IDAPA 58.01.01.220.01; although there are inherent physical and operational restrictions reducing hours and usage on the dry chemical storage silos, the fire pump engine, the cooling towers, and the emergency generator engine, for simplicity in this PTC exemption demonstration, 8,760 hours per year has been used as the maximum capacity in demonstrating no regulated air pollutant equals or exceeds the significance threshold provided in IDAPA 58.01.01.06.106.

b). Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c). Particulate matter with an aerodynamic diameter less than or equal to a nominal two and a half (2.5) micrometers.

d). Assumes linear increase in emission rates from PTC emission rate based on incremental unit horsepower increase (1,214 hp / 1,102 hp).

e). Assumes linear decrease in emission rates from PTC emission rate based on incremental unit horsepower decrease from 315 hp to 305 hp.

f). Assumes total dissolved solids (TDS) of blowdown of less than or equal to 5,000 ppm and a circulating flow rate of 76,151 gpm.

g). Total emissions from the three (3) dry chemical storage silos. Annual totals assume each silo is loaded continuously, 8760 hr/year.

h). Assumes both the gasoline and diesel tank are filled with 250 gallons of fuel (tank capacity) every day with an annual throughput of 91,250 gallons of gasoline and 91,250 gallons of diesel.

i). Threshold level based on significant emission rate contained in IDAPA 58.01.01.006.106.

6.1.3. IDAPA 58.01.01.220.01.b. Applicability

Combination. The source is not part of a proposed new major facility or part of a proposed major modification.

This section reviews if the proposed PTC amendments cause or contribute to a physical change that results in a significant emission increase in accordance with 40 CFR 52.21(a)(2)(iv)(d) and thus constitute as a major modification as defined by 40 CFR 52.21(b)(2)(i). Table 11 below, details the increase in emissions associated with the combined action of the requested PTC amendments contained in this request. As detailed in Table 11, the increase in criteria pollutant emissions (assuming actual emissions due to operational restrictions on use) is less than the significance threshold for all criteria pollutants. Therefore, in accordance with 40 CFR 52.21(a)(2)(iv)(d) the increase in emissions associated with the change in installed equipment is not significant, and therefore IDAPA 58.01.01.220.01.b is satisfied.

Table 11: Proposed Increase in Potential to Emit, Significance Determination

Proposed Increase in Potential to Emit, Criteria Pollutants[a] for use with Determining Applicability with 220.01.b

Emissions Units		NO_X	CO	VOC	PM_{10}[b]	$PM_{2.5}$[c]	SO_2	Pb
		T/yr	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
CT and Duct Burner	peak-load	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	low-load							
	startup/shutdown							
emergency generator engine[d]		0.04	0.02	0.00	0.00	0.00	0.00	
fire pump engine[e]		0.00	0.00	0.00	0.00	0.00	0.00	
cooling towers[f]					0.59	0.59		
dry chemical storage silos[g]					0.00	0.00		
above ground storage tank[h]				0.15				
paved roads					0.00	0.00		
unpaved roads					0.00	0.00		
Facility-Wide Totals		**0.04**	**0.02**	**0.15**	**0.59**	**0.59**	**0.00**	**0.00**
Significance Threshold[i]		40	100	40	15	10	40	0.6
Is the proposed change in emission rate assuming enforceable limits on hours and physical and operational design less than the significance threshold values?		No	No	No	No	No	No	No

a). All emission factors contained in this Table are the same as the values contained in Table 7 of this analysis.

b). Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c). Particulate matter with an aerodynamic diameter less than or equal to a nominal two and a half (2.5) micrometers.

d). Assumes linear increase in emission rates from PTC emission rate based on incremental unit horsepower increase (1,214 hp / 1,102 hp).

e). Assumes linear decrease in emission rates from PTC emission rate based on incremental unit horsepower decrease from 315 hp to 305 hp.

f). Assumes total dissolved solids (TDS) of blowdown of less than or equal to 5,000 ppm and a circulating flow rate of 76,151 gpm.

g). Total emissions from the three (3) dry chemical storage silos. Annual totals assume each silo is loaded for up to 2 hours, and 48 hours per year.

h). Assumes both the gasoline and diesel tank are filled with 250 gallons of fuel (tank capacity) every day with an annual throughput of 91,250 gallons of gasoline and 91,250 gallons of diesel.

i). Significance threshold values as included in IDAPA 58.01.01.006.106.

6.1.4. IDAPA 58.01.01.220.02 Applicability – Record Retention

Record Retention. *Unless the source is subject to and the owner or operator complies with Section 385, the owner or operator of the source, except for those sources listed in Subsections 222.02.a. through 222.02.g., shall maintain documentation on site which shall identify the exemption determined to apply to the source and verify that the source qualifies for the identified exemption. The records and documentation shall be kept for a period of time not less than five (5) years from the date the exemption determination has been made or for the life of the source for which the exemption has been determined to apply, which ever is greater, or until such time as a permit to construct or an operating permit is issued which covers the operation of the source. The owner or operator shall submit the documentation to the Department upon request.*

Until the requested changes are incorporated into a PTC, or Tier I Permit, or for a period not less than 5 years, a copy of this analysis shall serve as the record retention documentation, and shall remain on site to verify that the source qualifies for the identified exemption.

6.2. IDAPA 58.01.01.221 Applicability – Category 1 Exemption Qualification

No permit to construct is required for a source that satisfies the criteria set forth in Section 220 and the following:

This section reviews the applicability of a Category 1 Exemption with regard to the requested changes included in this report. In accordance with IDAPA 58.01.01.221, the changes requested in this report qualify for a Category 1 Exemption to a Permit-to-construct because the increase requested is Below Regulatory Concern.

6.2.1. IDAPA 58.01.01.221.01 Applicability, Below Regulatory Concern

Below Regulatory Concern. *The maximum capacity of a source to emit an air pollutant under its physical and operational design considering limitations on emissions such as air pollution control equipment, restrictions on hours of operation and restrictions on the type and amount of material combusted, stored or processed shall be less than ten percent (10%) of the significant emission rates set out in the definition of significant at Section 006.*

Table 12 presents an evaluation of the potential criteria pollutant emissions (considering the actual imposed operating conditions on the equipment) with the significance criteria provided in IDAPA 58.01.01.006. As noted in Table 12, for every criteria pollutant the emission rate is less than 10% of the significance threshold, therefore in accordance with IDAPA 58.01.01.221.01 the increase in emissions associated with the changes requested in this analysis are Below Regulatory Concern for all Criteria Pollutants.

Table 12: Proposed Increase in Criteria Pollutant Emission Rates, Below Regulatory Concern Demonstration

Change in Potential to Emit Criteria Pollutants[a] for use in Determining Applicability with 221.01

Emissions Units		NO_X	CO	VOC	PM_{10}[b]	$PM_{2.5}$[c]	SO_2	Pb
		T/yr	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
CT and Duct Burner	peak-load	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	low-load							
	startup/shutdown							
emergency generator engine[d]		0.04	0.02	0.00	0.00	0.00	0.00	
fire pump engine[e]		0.00	0.00	0.00	0.00	0.00	0.00	
cooling towers[f]					0.59	0.59		
dry chemical storage silos[g]					0.00	0.00		
above ground storage tank[h]				0.15				
paved roads					0.00	0.00		
unpaved roads					0.00	0.00		
Facility-Wide Totals		**0.04**	**0.02**	**0.15**	**0.59**	**0.59**	**0.00**	**0.00**
Significance Threshold[i]		**40**	**100**	**40**	**15**	**10**	**40**	**0.6**
Percent of Threshold		**0.1%**	**0.0%**	**0.4%**	**3.9%**	**5.9%**	**0.0%**	**0.0%**
Is the proposed change in emission rate assuming enforceable limits on hours and physical and operational design greater than 10% of the significance threshold values?		**No**	**No**	**No**	**No**	**No**	**No**	**No**

a). All emission factors contained in this table are the same as the values contained in Table 7 of this analysis.

b). Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

c). Particulate matter with an aerodynamic diameter less than or equal to a nominal two and a half (2.5) micrometers.

d). Assumes linear increase in emission rates from PTC emission rate based on incremental unit horsepower increase (1,214 hp / 1,102 hp).

e). Assumes linear decrease in emission rates from PTC emission rate based on incremental unit horsepower decrease from 315 hp to 305 hp.

f). Assumes total dissolved solids (TDS) of blowdown of less than or equal to 5,000 ppm and a circulating flow rate of 76,151 gpm.

g). Total emissions from the three (3) dry chemical storage silos. Annual totals assume each silo is loaded for up to 2 hours, and 48 hours per year.

h). Assumes both the gasoline and diesel tank are filled with 250 gallons of fuel (tank capacity) every day with an annual throughput of 91,250 gallons of gasoline and 91,250 gallons of diesel.

i). Significance threshold values as included in IDAPA 58.01.01.006.106.

6.2.2. IDAPA 58.01.01.221.02. Applicability - Radionuclide

***Radionuclides**. The source shall have potential emissions that are less than one percent (1%) of the applicable radionuclides standard in 40 CFR Part 61, Subpart H.*

There are no radionuclide emissions associated with the changes requested in this application.

6.2.3. IDAPA 58.01.01.221.03. Applicability - TAPS

***Toxic Air Pollutants**. The source shall comply with Section 223.*

223. EXEMPTION CRITERIA AND REPORTING REQUIREMENTS FOR TOXIC AIR POLLUTANT EMISSIONS.

02. No permit to construct for toxic air pollutants is required for a source that satisfies any of the exemption criteria below, the recordkeeping requirements at Subsection 220.02, and reporting requirements as follows:

a. The uncontrolled emission rate (refer to Section 210) for all toxic air pollutants shall be less than or equal to all applicable screening emission levels listed in Sections 585 and 586; or

b. the uncontrolled ambient concentration (refer to Section 210) for all toxic air pollutants at the point of compliance shall be less than or equal to all applicable acceptable ambient concentrations listed in Sections 585 and 586.

Table 13 below provides a comparison of the increase in Toxic Air Pollutants (TAP) for the combined action of all of the requested changes included in the PTC with the relevant screening level. As noted in Table 13, all of the TAP emissions are less than the applicable screening emission level and thus meet 58.01.01.223.02.a.

Table 13: Proposed Change in HAP/TAP Emissions, Applicable Screening Level Review

Toxic Air Pollutants							
Pollutant	Category	Averaging Period for Pollutant	Screening Emission Level [EL] [lb/hr]	Annual Average [lb/hr]	24-Hour Average [lb/hr]	Annual average over EL?	24 hr average over EL?
1,3-Butadiene	HAP / TAP-586	Annual	2.40E-05	1.96E-08	3.57E-07	No	
Acenaphthene	HAP / TAP-586	Annual	9.10E-05	1.08E-08	2.59E-07	No	
Acenaphthylene	HAP / TAP-586	Annual	9.10E-05	2.25E-08	5.31E-07	No	
Acetaldehyde	HAP / TAP-586	Annual	3.00E-03	4.38E-07	8.33E-06	No	
Acrolein	HAP / TAP-585	24-hour	1.70E-02	6.33E-08	1.26E-06		No
Anthracene	HAP / TAP-586	Annual	9.10E-05	3.59E-09	8.17E-08	No	
Benzene	HAP / TAP-586	Annual	8.00E-04	4.36E-04	4.83E-04	No	
Benzo(a)pyrene	HAP / TAP-586	Annual	2.00E-06	6.49E-10	1.52E-08	No	
Benzo(g,h,l)perylene	HAP / TAP-586	Annual	9.10E-05	1.45E-09	3.37E-08	No	
Cyclohexane	HAP / TAP-585	24-hour	6.77E+01	4.57E-05	4.57E-05		No
Ethyl alcohol	HAP / TAP-585	24-hour	1.25E+02	5.48E-04	5.48E-04		No
Fluoranthene	HAP / TAP-586	Annual	9.10E-05	3.81E-09	6.95E-08	No	
Fluorene	HAP / TAP-586	Annual	9.10E-05	4.22E-08	9.39E-07	No	
Formaldehyde	HAP / TAP-586	Annual	5.10E-04	7.61E-07	1.49E-05	No	
Naphthalene	TAP-585	24-hour	3.33E+00	3.23E-07	7.60E-06		No
Phenanthrene	HAP / TAP-586	Annual	9.10E-05	1.03E-07	2.41E-06	No	
Propylene oxide	HAP / TAP-585	24-hour	3.20E+00	7.31E-06	1.70E-04		No
Pyrene	HAP / TAP-586	Annual	9.10E-05	1.04E-08	2.39E-07	No	
Toluene	HAP / TAP-585	24-hour	2.50E+01	2.41E-04	2.58E-04		No
1,2,4-Trimethylbenzene	HAP / TAP-585	24-hour	8.20E+00	1.03E-05	1.03E-05		No
Vanadium	TAP-585	24-hour	3.00E-03	5.42E-07	1.27E-05		No
Xylenes	HAP / TAP-585	24-hour	2.90E+01	4.17E-05	5.38E-05		No

6.2.4. IDAPA 58.01.01.221.04. Applicability - Mercury

***Mercury**. The source shall have potential emissions that are less than twenty-five (25) pounds per year of mercury. Fugitive emissions shall not be included in the calculation of potential mercury emissions.*

There is no change in mercury emissions, associated with the changes requested in this application.

7. Compliance Certification and Certificate

The Langley Gulch Power Plant will comply with applicable requirements, and if the proposed changes to the facility are made to the Permit-to-construct, will in a timely manner meet additional applicable requirements that become effective for this facility.

Certification of Truth, Accuracy, and Completeness (by Responsible Official).

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Name: Dale Koger

Title: MGR Power Production

Date: 4-30-2013

8. Appendix 1 – EPA Engine Certificates

Emergency Diesel Generator Engine Certificate (copy)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF TRANSPORTATION AND AIR QUALITY
WASHINGTON, DC 20460

CERTIFICATE OF CONFORMITY
2010 MODEL YEAR

Manufacturer:	CATERPILLAR, INC.
Engine Family:	ACPXL27.0ESW
Certificate Number:	CPX-NRCI-10-03
Intended Service Class:	NR 9 (>560)
Fuel Type:	DIESEL
FELs: g/kW-hr	NMHC +NOx: 6.3 NOx: N/A PM: 0.19
Effective Date:	9/23/2009
Date Issued:	9/23/2009

Karl J. Simon, Director
Compliance and Innovative Strategies Division
Office of Transportation and Air Quality

Pursuant to Section 111 and Section 213 of the Clean Air Act (42 U.S.C. sections 7411 and 7547) and 40 CFR Part 60 and Part 89, and subject to the terms and conditions prescribed in those provisions, this certificate of conformity is hereby issued with respect to the test engines which have been found to conform to applicable requirements and which represent the following stationary and nonroad engines, by engine family, more fully described in the documentation required by 40 CFR Part 60 and 89, and produced in the stated model year.

This certificate of conformity covers only those new stationary and nonroad compression-ignition engines which conform in all material respects to the design specifications that applied to those engines described in the documentation required by 40 CFR Part 60 and 89 and which are produced during the model year stated on this certificate of the said manufacturer, as defined in 40 CFR Part 60 and 89.

This certificate of conformity is conditional upon compliance of said manufacturer with the averaging, banking and trading provisions of 40 CFR Part 89, Subpart C. Failure to comply with these provisions may render this certificate void ab initio.

It is a term of this certificate that the manufacturer shall consent to all inspections described in 40 CFR 89.129-96 and 89.506-96 and authorized in a warrant or court order. Failure to comply with the requirements of such a warrant or court order may lead to a revocation or suspension of this certificate for reasons specified in 40 CFR Part 89. It is also a term of this certificate that this certificate may be revoked or suspended or rendered void ab initio for other reasons specified in 40 CFR Part 89.

This certificate does not cover stationary and nonroad engines sold, offered for sale, or introduced, or delivered for introduction, into commerce in the U.S. prior to the effective date of the certificate.

Emergency Fire Pump Engine Certificate (copy)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF TRANSPORTATION AND AIR QUALITY
WASHINGTON, DC 20460

CERTIFICATE OF CONFORMITY
2010 MODEL YEAR

Manufacturer:	**CUMMINS INC.**
Engine Family:	**ACEXL0540AAB**
Certificate Number:	**CEX-STNRCI-10-30**
Intended Service Class:	**NR 7 (225-450)**
Fuel Type:	**DIESEL**
FELs: g/kW-hr	**NMHC +NOx: N/A NOx: N/A PM: N/A**
Effective Date:	**9/14/2009**
Date Issued:	**9/14/2009**

Karl J. Simon, Director
Compliance and Innovative Strategies Division
Office of Transportation and Air Quality

Pursuant to Section 111 and Section 213 of the Clean Air Act (42 U.S.C. sections 7411 and 7547) and 40 CFR Part 60 and Part 89, and subject to the terms and conditions prescribed in those provisions, this certificate of conformity is hereby issued with respect to the test engines which have been found to conform to applicable requirements and which represent the following stationary and nonroad engines, by engine family, more fully described in the documentation required by 40 CFR Part 60 and 89, and produced in the stated model year.

This certificate of conformity covers only those new stationary and nonroad compression-ignition engines which conform in all material respects to the design specifications that applied to those engines described in the documentation required by 40 CFR Part 60 and 89 and which are produced during the model year stated on this certificate of the said manufacturer, as defined in 40 CFR Part 60 and 89.

It is a term of this certificate that the manufacturer shall consent to all inspections described in 40 CFR 89.129-96 and 89.506-96 and authorized in a warrant or court order. Failure to comply with the requirements of such a warrant or court order may lead to a revocation or suspension of this certificate for reasons specified in 40 CFR Part 89. It is also a term of this certificate that this certificate may be revoked or suspended or rendered void ab initio for other reasons specified in 40 CFR Part 89.

This certificate does not cover stationary and nonroad engines sold, offered for sale, or introduced, or delivered for introduction, into commerce in the U.S. prior to the effective date of the certificate.

9. Appendix 2 – Above Ground Storage Tank Information

DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Revision 3
11/20/2012

This form is for facilities desiring an exemption from the requirement to obtain a permit to construct for certain sources. The Rules for the Control of Air Pollution in Idaho (IDAPA 58.01.01.220 through 223) allow for owners or operators to exempt certain sources from the requirement to obtain a permit to construct. This form is a tool to assist facilities in preparing and maintaining their exemption documentation in support of a PTC exemption.

A PTC exemption does not release the owner or operator from compliance with all other applicable federal (e.g., NSPS, Tier I operating permit), state, or local laws, regulations, permits, or ordinances.

This form is for one project, which may include several emission units. The emission unit(s) cannot be exempted separately.

For each box in the form below, CTRL+click[1] on the blue underlined text for instructions and information.

IDENTIFICATION					
1. Company Name:	**Idaho Power Company**	**2. Facility Name:**	**Langley Gulch Power Plant**	**3. Facility ID No.:**	**075-00012**
4. Brief Project Description:	**Installation of an aboveground storage tank (AST)**				

GENERAL INFORMATION		
5. Facility Information	Name of facility contact person: **Trevor Mahlum**	Telephone and email for facility contact person: **(208) 388-2426; tmahlum@idahopower.com**
	Facility location: **Interstate 84 and State Hwy 30; 5 miles south of New Plymouth, Idaho**	
6. Complete Project Description	Provide a complete description and specification of equipment and activity being exempted in a separate sheet(s). **The AST is a dual compartment aboveground storage tank. Tank contents include gasoline and diesel fuel. Each compartment has a capacity of 250 gallons. Fuel is used for various portable and mobile equipment related to maintenance at the facility.**	

GENERAL EXEMPTION CRITERIA		
7. Dates	Date of exemption determination: **2/11/13**	Date of construction commencement (estimated/actual): **2/12/13**
8. For each regulated air pollutant, are the uncontrolled emissions or uncontrolled emissions increase of the project/source greater than or equal to 100 tons per year? Please attach supporting documentation.	☐ Yes ☒ No If yes, the project/source cannot be exempted.	
9. Is the facility a major facility/major stationary source? Please attach supporting documentation.	☒ Yes ☐ No If yes, continue with question #10. If no, skip question #10 and go to question #11.	

[1] Place your cursor over the blue underlined number or text, then click while holding down the Ctrl key.

10. For each regulated air pollutant, is the emissions increase of the project/source greater than or equal to the significant emissions rate? Please attach supporting documentation.	☐ Yes ☒ No If yes, the project/source cannot be exempted.
11. Is the source part of a proposed *new* major facility/major stationary source or part of a proposed major modification?	☐ Yes ☒ No If yes, the project/source cannot be exempted.
CATEGORY II EXEMPTION	
12. Does project/source qualify for exemption in accordance with IDAPA 58.01.01.222 (not including IDAPA 58.01.01.222.01.a and e)?	☐ Yes. Cite the applicable rules: Then go to question #22. ☒ No
13. Does the project/source qualify for exemption in accordance with IDAPA 58.01.01.222.01.a?	☐ Yes ☒ No. If no, go to question #14.
13a. This question only applies to Department of Energy (DOE) facilities: are the emissions of radionuclides less than 1% of the applicable standard? Please attach supporting documentation.	☐ Yes. If yes, go to question #17. ☐ No. If no, the project/source cannot be exempted. ☐ N/A. If N/A, go to question #17.
14. Does the project/source qualify for exemption in accordance with IDAPA 58.01.01.222.01.e?	☐ Yes ☒ No. If no, go to question #15
14a. Are the emissions of radionuclides less than 1% of the applicable standard? Please attach supporting documentation.	☐ Yes ☐ No. If no, the project/source cannot be exempted. ☐ N/A
14b. Will the exemption for a pilot plant terminate one year after the commencement of operations and not be renewed?	☐ Yes. If yes, go to question #17. ☐ No. If no, go to question #15. ☐ N/A. If N/A, go to question #17.
CATEGORY I EXEMPTION	
15. Are the controlled emissions below regulatory concern? Please attach supporting documentation.	☒ Yes ☐ No. If no, the project/source cannot be exempted.
16. Are the emissions of radionuclides less than 1% of the applicable standard? Please attach supporting documentation.	☐ Yes ☐ No. If no, the project/source cannot be exempted. ☒ N/A
17. Does the source have potential emissions that are less than twenty-five (25) pounds per year of mercury?	☒ Yes ☐ No. If no, the project/source cannot be exempted. ☐ N/A
TAP EXEMPTION	
18. Does the source emit a toxic air pollutant(s) (TAP)?	☒ Yes ☐ No. If no, go to question #23.
19. Is the increase in the uncontrolled emissions rate of TAP of the project/source below regulatory concern of TAP? Please attach supporting documentation.	☐ Yes, If yes, go to question #23. ☒ No
20. Is the increase in the uncontrolled emissions rate of TAP of the project/source less than or equal to all emissions levels ? Please attach supporting documentation.	☒ Yes, If yes, go to question #22. ☐ No

21. Is the uncontrolled ambient concentration of TAP of the project/source less than or equal to all acceptable ambient concentrations (AACs and/or AACCs)? Please attach supporting documentation.	☐ Yes. If yes, go to question #22. ☐ No. If no, the project/source cannot be exempted.
22. Has a Toxic Air Pollutant Exemption Report been submitted?	☐ Yes ☒ No
RECORD RETENTION	
23. Are the records that identify and verify the exemption maintained on-site?	☒ Yes ☐ No If yes, the project can be exempted.
CERTIFICATION	
In accordance with IDAPA 58.01.01.123 (Rules for the Control of Air Pollution in Idaho), I certify based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	
24. Responsible Official's Name and Title	Dale Koger, MGR Power Production
25. Responsible Official's Signature	Dale Koger — Date: 2/11/13

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification

User Identification:	Langley, Diesel AST
City:	New Plymouth
State:	Idaho
Company:	Idaho Power Company
Type of Tank:	Horizontal Tank
Description:	

Tank Dimensions

Shell Length (ft):		5.00
Diameter (ft):		4.20
Volume (gallons):		250.00
Turnovers:		365.00
Net Throughput(gal/yr):		91,250.00
Is Tank Heated (y/n):	N	
Is Tank Underground (y/n):	N	

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Boise, Idaho (Avg Atmospheric Pressure = 13.28 psia)

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Distillate fuel oil no. 2	All	52.81	46.88	58.74	50.94	0.0051	0.0041	0.0062	130.0000			188.00	Option 1: VP50 = .0045 VP60 = .0065

Annual Emission Calculations

Standing Losses (lb):	0.0807
Vapor Space Volume (cu ft):	44.1224
Vapor Density (lb/cu ft):	0.0001
Vapor Space Expansion Factor:	0.0419
Vented Vapor Saturation Factor:	0.9994
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	44.1224
Tank Diameter (ft):	4.2000
Effective Diameter (ft):	5.1722
Vapor Space Outage (ft):	2.1000
Tank Shell Length (ft):	5.0000
Vapor Density	
Vapor Density (lb/cu ft):	0.0001
Vapor Molecular Weight (lb/lb-mole):	130.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0051
Daily Avg. Liquid Surface Temp. (deg. R):	512.4830
Daily Average Ambient Temp. (deg. F):	50.9208
Ideal Gas Constant R (psia cuft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	510.6108
Tank Paint Solar Absorptance (Shell):	0.1700
Daily Total Solar Insulation Factor (Btu/sqft day):	1,400.5355
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.0419
Daily Vapor Temperature Range (deg. R):	23.7125
Daily Vapor Pressure Range (psia):	0.0022
Breather Vent Press. Setting Range(psia):	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0051
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	0.0041
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	0.0062
Daily Avg. Liquid Surface Temp. (deg R):	512.4830
Daily Min. Liquid Surface Temp. (deg R):	506.5548
Daily Max. Liquid Surface Temp. (deg R):	518.4111
Daily Ambient Temp. Range (deg. R):	23.6750
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.9994
Vapor Pressure at Daily Average Liquid: Surface Temperature (psia):	0.0051
Vapor Space Outage (ft):	2.1000
Working Losses (lb):	0.3558
Vapor Molecular Weight (lb/lb-mole):	130.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.0051
Annual Net Throughput (gal/yr.):	91,250.0000
Annual Turnovers:	365.0000
Turnover Factor:	0.2489
Tank Diameter (ft):	4.2000
Working Loss Product Factor:	1.0000
Total Losses (lb):	0.4366

Emissions Report for: Annual

Langley, Diesel AST - Horizontal Tank
New Plymouth, Idaho

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Distillate fuel oil no. 2	0.36	0.08	0.44

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification		
User Identification:	Langley Gasoline Tank	
City:		
State:		
Company:		
Type of Tank:	Horizontal Tank	
Description:		
Tank Dimensions		
Shell Length (ft):		5.00
Diameter (ft):		4.00
Volume (gallons):		250.00
Turnovers:		365.00
Net Throughput(gal/yr):		91,250.00
Is Tank Heated (y/n):	N	
Is Tank Underground (y/n):	N	
Paint Characteristics		
Shell Color/Shade:	White/White	
Shell Condition	Good	
Breather Vent Settings		
Vacuum Settings (psig):		-0.03
Pressure Settings (psig)		0.03

Meteorological Data used in Emissions Calculations: Boise, Idaho (Avg Atmospheric Pressure = 13.28 psia)

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F) Avg.	Min.	Max.	Liquid Bulk Temp (deg F)	Vapor Pressure (psia) Avg.	Min.	Max.	Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
Gasoline (RVP 11.5)	All	52.81	46.88	58.74	50.94	5.2758	4.6922	5.9162	65.0000			92.00	Option 4: RVP=11.5, ASTM Slope=3
1,2,4-Trimethylbenzene						0.0152	0.0119	0.0194	120.1900	0.0700	0.0003	120.19	Option 2: A=7.04383, B=1573.267, C=208.56
Benzene						0.9535	0.8024	1.1277	78.1100	0.0500	0.0128	78.11	Option 2: A=6.905, B=1211.033, C=220.79
Cyclohexane						0.9938	0.8397	1.1707	84.1600	0.0050	0.0013	84.16	Option 2: A=6.841, B=1201.53, C=222.65
Ethyl alcohol						0.5120	0.4138	0.6299	46.0700	0.1000	0.0137	46.07	Option 2: A=8.321, B=1718.21, C=237.52
Naphthalene						0.0018	0.0014	0.0023	128.2000	0.0020	0.0000	128.20	Option 2: A=7.3729, B=1968.36, C=222.61
Toluene						0.2629	0.2166	0.3174	92.1300	0.1000	0.0071	92.13	Option 2: A=6.954, B=1344.8, C=219.48
Unidentified Components						9.6828	9.4464	9.6039	65.0345	0.6080	0.9636	106.60	
Xylenes (mixed isomers)						0.0699	0.0561	0.0865	106.1700	0.0650	0.0012	106.17	Option 2: A=7.009, B=1462.266, C=215.11

Langley Gasoline Tank - Horizontal Tank

Annual Emission Calculations	
Standing Losses (lb):	111.9639
Vapor Space Volume (cu ft):	40.0203
Vapor Density (lb/cu ft):	0.0624
Vapor Space Expansion Factor:	0.1917
Vented Vapor Saturation Factor:	0.6413
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	40.0203
Tank Diameter (ft):	4.0000
Effective Diameter (ft):	5.0475
Vapor Space Outage (ft):	2.0000
Tank Shell Length (ft):	5.0000
Vapor Density	
Vapor Density (lb/cu ft):	0.0624
Vapor Molecular Weight (lb/lb-mole):	65.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	5.2758
Daily Avg. Liquid Surface Temp. (deg. R):	512.4830
Daily Average Ambient Temp. (deg. F):	50.9208
Ideal Gas Constant R (psia cuft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	510.6108
Tank Paint Solar Absorptance (Shell):	0.1700
Daily Total Solar Insulation Factor (Btu/sqft day):	1,400.5355
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.1917
Daily Vapor Temperature Range (deg. R):	23.7125
Daily Vapor Pressure Range (psia):	1.2240
Breather Vent Press. Setting Range(psia):	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	5.2758
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	4.6922
Vapor Pressure at Daily Maximum Liquid	

Surface Temperature (psia):	5.9162
Daily Avg. Liquid Surface Temp. (deg R):	512.4830
Daily Min. Liquid Surface Temp. (deg R):	506.5548
Daily Max. Liquid Surface Temp. (deg R):	518.4111
Daily Ambient Temp. Range (deg. R):	23.6750
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.6413
Vapor Pressure at Daily Average Liquid:	
Surface Temperature (psia):	5.2758
Vapor Space Outage (ft):	2.0000
Working Losses (lb):	185.4126
Vapor Molecular Weight (lb/lb-mole):	65.0000
Vapor Pressure at Daily Average Liquid	
Surface Temperature (psia):	5.2758
Annual Net Throughput (gal/yr.):	91,250.0000
Annual Turnovers:	365.0000
Turnover Factor:	0.2489
Tank Diameter (ft):	4.0000
Working Loss Product Factor:	1.0000
Total Losses (lb):	297.3765

Emissions Report for: Annual

Langley Gasoline Tank - Horizontal Tank

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Gasoline (RVP 11.5)	185.41	111.96	297.38
Benzene	2.37	1.43	3.80
Cyclohexane	0.25	0.15	0.40
Toluene	1.31	0.79	2.10
Xylenes (mixed isomers)	0.23	0.14	0.36
1,2,4-Trimethylbenzene	0.05	0.03	0.09
Naphthalene	0.00	0.00	0.00
Ethyl alcohol	2.55	1.54	4.08
Unidentified Components	178.66	107.89	286.55

TAP Exemption

	Losses(lbs)	Losses (lb/hr)	IDEQ Emission Screening Level (lb/hr)
Benzene	3.80	4.3E-04	8.0E-04
Cyclohexane	0.40	4.6E-05	70
Toluene	2.10	2.4E-04	25
Xylenes (mixed isomers)	0.36	4.1E-05	29
1,2,4-Trimethylbenzene	0.09	1.0E-05	8.2
Naphthalene	0.00	< 1.0E-07	3.33
Ethyl alcohol	4.08	4.7E-04	125

TAP Exemption Level 1 for Benzene

TAP Exemption BRC for all other TAPs