



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Curt Fransen, Director

July 30, 2014

Robert Harmon
Northwest Pipeline LLC
295 Chipeta Way
Salt Lake City, Utah 84108

RE: Facility ID No. 083-00050, Northwest Pipeline LLC, Buhl
Final Permit Letter

Dear Mr. Harmon:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0139 Project 61381 to Northwest Pipeline LLC located at Buhl for the facility name change. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received May 22, 2014.

This permit is effective immediately and replaces PTC No. P-2011.0139 project 60963, issued on December 9, 2011. This permit does not release Northwest Pipeline LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Regional Air Quality Manager, at (208) 736-2190 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that 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 contact Robert Baldwin at (208) 373-0502 or robert.baldwin@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSRB

Permit No. P-2011.0139 PROJ 61381

Enclosures

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee Northwest Pipeline LLC
Permit Number P-2011.0139
Project ID 61381
Facility ID 083-00050
Facility Location Section 25, T9S, R13E – 20 miles west of Buhl

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued July 30, 2014



Robert Baldwin, Permit Writer



Mike Simon, Stationary Source Manager

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1. Permit Scope

Purpose

- 1.1 This is a revised permit to construct to update the present name of the facility. The previous permit cover page no longer maintains that information. The requested change has been accounted for in the internal DEQ database. No other changes have been made to the permit.
- 1.2 This PTC replaces Permit to Construct No. P-2011.0139 Project 60963, issued on December 9, 2011.
- 1.3 The emission sources regulated by this permit are listed in the following table.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1. REGULATED SOURCES.

Source	Control Equipment
Solar Centaur T-4700S Turbine	SoLo NOx Combustor
Solar Centaur T- 5502 Turbine	None

2. Solar centaur turbines (two)

2.1 Process Description

This facility consists of a Solar Centaur T-5502 turbine rated at 5500 hp (ISO) and a Solar Centaur T-4700S turbine rated at 4,700 hp. They provide mechanical power to compressors that transmit natural gas along a pipeline system.

2.2 Emission Controls Descriptions

Emissions from the T-4700S turbine are controlled by a SoLo NO_x combustor. Emissions from the T-5502 turbine are uncontrolled.

Emission Limits

2.3 Emission Limits

Sulfur dioxide (SO₂) oxides of nitrogen (NO_x), carbon monoxide (CO), and volatile organic compound (VOC) emissions from the turbine stacks shall not exceed any corresponding emissions rate limits listed in the following table:

Table 1 TURBINE EMISSION LIMITS ^(a)

Source Description	SO ₂		NO _x		CO		VOC	
	lb/hr ^(b)	T/yr ^(c)						
T-4700S Turbine	--	--	3.72	16.3	4.53	19.9	1.30	5.68
T-5502 Turbine	1.24	5.43	19.3	79.5	--	--	--	--

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- c) Tons per any consecutive 12-calendar month period.

2.4 Opacity Limit

Emissions from the turbine stacks, or any other stack, vent, or functionally equivalent opening associated with the turbines, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.5 Nitrogen Oxide Limit

Nitrogen oxide emissions shall not exceed 0.0159% by volume for the T-4700S turbine and 0.0169% by volume for the T-5502 turbine at 15% oxygen.

Operating Requirements

2.6 Fuel Requirements

The turbines shall be fired by natural gas exclusively.

2.7 Sulfur Content of Fuel

In accordance with 40 CFR 60.333(b), no fuel containing sulfur in excess of 0.8% by weight shall be burned.

Monitoring and Recordkeeping Requirements

2.8 Fuel Monitoring

The permittee shall continuously monitor and record the fuel usage for each of the turbines continuously using fuel flow meters. The fuel flow meters shall be calibrated once each year. The date and time of each calibration and any maintenance performed on the fuel meters shall also be recorded. Each calendar month, the permittee shall record the total monthly fuel usage and average hourly fuel usage for the turbines.

2.9 Emissions Calculations

Each month the permittee shall calculate the average hourly emissions and the monthly emissions in tons per month to demonstrate compliance with Emission Limits permit condition. The permittee shall use the data from the most recent performance test, where available, or the emission factors used in the permit application. Each month, the permittee shall calculate the annual emissions for the previous 12 consecutive month period. Records of these calculations shall be kept for a period of at least two years and shall be made available to DEQ representatives upon request.

2.10 Fuel Sulfur & Nitrogen Content

As long as the turbine is burning natural gas that meets the definition in 40 CFR 60.331(u), no monitoring of total sulfur content of the natural gas is required.

In accordance with 40 CFR 60.334(h)(3), the permittee shall use a current, valid purchase contract, tariff sheet or transportation contract for the natural gas, specifying that the maximum total sulfur content of the gaseous fuel is 20.0 grains/100 scf, or less, to demonstrate compliance with Permit Condition 2.7 and 40 CFR 60.331(u).

Reporting Requirements

2.11 Excess Emissions

The permittee shall submit reports of excess emissions as described in 40 CFR 60.334(c).

2.12 Certification of Documents

All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

Nitrogen content monitoring is not required in accordance with the January 19, 1999 custom fuel compliance schedule approved by EPA Region 10.

2.13 Fuel Sulfur Content

The permittee shall submit to DEQ the current, valid purchase contract, tariff sheet or transportation contract specified by the Fuel Sulfur Content permit condition.

2.14 Notification

The permittee shall furnish to DEQ and EPA Region 10 office written notification for new or modified equipment subject to 40 CFR 60, Subpart GG as follows:

A notification of any physical or operational change to an existing facility that may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart of in Paragraph 60.14(e). This notice shall be postmarked within 60 days, or as soon as practicable, before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change.

3. General Provisions

General Compliance

3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

3.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

3.4 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 an emissions source is located, 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]

Construction and Operation Notification

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8 All performance 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, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9 Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this 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 58.01.01.211, 5/1/94]

Excess Emissions

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 3.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 3.13 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]

Tampering

- 3.14 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]

Transferability

- 3.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 3.16 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 58.01.01.211, 5/1/94]