



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

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

January 14, 2015

Robert Harmon, Director of Operations
Northwest Pipeline LLC – Bruneau
Little Valley Compressor Station
295 Chipeta Way
Salt Lake City, UT 84108

RE: Facility ID No. 073-00002, Northwest Pipeline LLC - Bruneau, Bruneau
Final Permit Letter

Dear Mr. Harmon:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2014.0030 Project 61399 to Northwest Pipeline LLC - Bruneau located at Bruneau for the company 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 July 8, 2014.

This permit is effective immediately and replaces PTC issued on April 7, 1994 with Permit Number of 118-00002. This permit does not release to Northwest Pipeline LLC - Bruneau 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 Tom Krinke, AQ Compliance Officer, at (208) 373-0419 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 Shawnee Chen at (208) 373-0502 or Shawnee.chen@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". The signature is written in a cursive, flowing style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\SYC

Permit No. P-2014.0030 PROJ 61399

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Northwest Pipeline LLC
Permit Number P-2014.0030
Project ID 61399
Facility ID 073-00002
Facility Location 28000 Pipeline Road
Bruneau, Idaho 83604

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 January 14, 2015



Shawnee Chen, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

- 1.1 This is a revised permit to construct (PTC) for a facility name change.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct issued on April 7, 1994 with Permit Number of 118-00002.

Regulated Sources

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

Table 1.1. Regulated sources.

Permit Section	Source	Control Equipment
2	<u>Compressor No. 1 (Unit 1)</u> Manufacturer: Solar Model: Saturn T-1200 Turbine Burner type: natural gas turbine Fuel: natural gas Max rating: 1,199 hp @ISO conditions Rated heat input capacity: 11.78 MMBtu/hr	None
2	<u>Compressor No. 2 (Unit 2)</u> Manufacturer: Solar Model: Saturn T-1300 Turbine Burner type: natural gas turbine Fuel: natural gas Max rating: 1,339 hp @ISO conditions Rated heat input capacity: 13.26 MMBtu/hr	None
2	<u>Compressor No. 3 (Unit 3, skid mounted, portable unit)</u> Manufacturer: Solar Model: Saturn T-1300 Turbine Burner type: natural gas turbine Fuel: natural gas Max rating: 1,339 hp @ISO conditions Rated heat input capacity: 13.26 MMBtu/hr	None

2 Natural Gas-Fired Turbines

2.1 Process Description

The facility consists of three natural gas-fired turbine compressors in Bruneau, near the C.J. Strike Reservoir. Refer to Table 1.1 for equipment descriptions. They are stationary gas turbine as defined in 40 CFR 60.331(a)

2.2 Control Device Descriptions

Emissions from the turbines are uncontrolled.

Emission Limits

2.3 Emission Limits

2.3.1 Emissions of nitrogen oxides (NO_x) from each turbine stack shall not exceed 0.015 percent (%) by volume as required in 40 CFR 60.332(c) and the pound per hour (lb/hr) or tons per year (T/yr) values listed in Appendix A, based on 8,760 hours of operation per year.

2.3.2 Emissions of sulfur dioxide (SO₂) from each turbine stack shall not exceed 0.015 percent (%) by volume as required in 40 CFR 60.333(a) and the pound per hour (lb/hr) or tons per year (T/yr) values listed in Appendix A, based on 8,760 hours of operation per year.

2.3.3 Emissions of total suspended particulate (TSP), carbon monoxide (CO), and volatile organic compounds (VOC) from each turbine stack shall not exceed the pound per hour (lb/hr) or tons per year (T/yr) values listed in Appendix A, based on 8,760 hours of operation per year.

2.4 Opacity Limit

Emissions from each turbine stack, or any other stack, vent, or functionally equivalent opening associated with the each turbine stack, 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.

Operating Requirements

2.5 Fuel Sulfur Limit

The permittee shall burn, in each turbine, fuel which contains 0.8 weight percent (wt%), or less, sulfur, in accordance with 40 CFR 60.333(b).

Monitoring and Recordkeeping Requirements

2.6 Fuel Monitoring

The permittee shall monitor nitrogen content and sulfur content of the fuel being fired in the No. 2 and No. 3 turbines in accordance with 40 CFR 60.334 (c), or an alternative method approved by the Environmental Protection Agency (EPA). A copy of the EPA-approved alternative method shall be presented to the Department prior to implementation.

Performance Testing Requirements

2.7 NO_x and SO₂ Performance Test

Within 60 days after achieving maximum production rate, but not later than 180 days after initial start-up, the permittee shall conduct a performance test to measure the oxides of nitrogen and sulfur dioxide emissions from No. 2 and No. 3 turbines as required by 40 CFR 60.8 and in accordance with the test methods and procedures in 40 CFR 60.335. The testing requirements were fulfilled in 1993 and 1995 for No. 2 and No. 3 turbines, respectively.

Reporting Requirements

2.8 Reporting Requirement

The permittee shall submit a test protocol for the performance test required in section 2.7 of this permit to the Department for approval at least 30 days prior to the test date. The performance test report shall be submitted to the Department within 30 days of the date on which the performance test is conducted.

2.9 Reporting Requirement

The permittee shall provide a written report to the Department of any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by fuel-bound nitrogen allowance used during the performance test in accordance with 40 CFR 60.334(c), within ten 10 days of discovering the exceedence.

2.10 Reporting Requirement

The permittee shall provide a written report to the Department of any period during which the sulfur content of the fuel being fired in the No. 2 and No. 3 gas turbines exceeds 0.8 percent by weight (wt.%) in accordance with 40 CFR 60.334(c), within 10 days of discovering the exceedence.

Appendix A

Process Description	Particulates		CO		NOx		SO ₂		VOC	
	lb/hr ¹	T/yr ²								
Compressor No. 1 (Saturn T-1200)	0.18	0.77	8.2	36.7	3.5	15.2	0.3	1.3	2.6	11.3
Compressor No. 2 (Saturn T-1300)	0.2	0.87	6.0	26.1	3.9	17	0.3	1.5	0.6	2.6
Compressor No. 3 (Saturn T-1300)	0.2	0.87	6.0	26.1	3.9	17	0.3	1.5	0.6	2.6
TOTAL	0.58	2.51	20.2	88.9	11.3	49.2	0.9	4.3	3.8	16.5

¹ As determined by a pollutant specific promulgated U.S. EPA method, or Department approved alternative, or as determined by the Department's emission estimation methods used in this permit analysis.

² As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the actual hours per year that the process operates.

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, or up to 60 days when requested 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]