State of Idaho
Department of Environmental Quality
Air Quality Division

AIR QUALITY PERMIT
STATEMENT OF BASIS

Tier I Operating Permit No. T1-2010.0102

Project No. 60556

Final

Northwest Pipeline GP

Caldwell Compressor Station

Caldwell, Idaho

Facility ID No. 045-00004

March 18, 2011

Darrin Pampaian, P.E.

Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions including references to the applicable statutory or regulatory provisions for the terms and conditions as required by IDAPA 58.01.01.362

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Acronyms, Units and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
$\mu g/m^3$	micrograms per cubic meter
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO_2	sulfur dioxide
SO_x	sulfur oxides
TAP	toxic air pollutant
Tier I	Tier I operating permit

T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. INTRODUCTION AND APPLICABILITY

Northwest Pipeline GP, Caldwell Pumping Station (NWPGP) is a natural gas compressor station, and is located at Section 34, Township 6S, Range 3E, near Caldwell Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit NO_X and VOC above the major source threshold of 100 tons-per-year. The facility is also classified as a major facility, as defined by Subsection 008.10.a, because it emits or has the potential to emit formaldehyde above the major source thresholds of 10 tons-per-year for any single HAP. As a major facility, NWPGP is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. This project is to renew the previous Tier I permit that was re-issued (for a name change) and which expires February 24, 2011. The application for a Tier I operating permit contains a certification from NWPGP as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for NWPGP.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

NWPGP Tier I operating permit is organized into sections. They are as follows:

Section 1 – Tier I Operating Permit Scope

The scope describes this permitting action.

Section 2 – Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 3 through 4 – Units 1, 2, and 3/Reciprocating IC Engines and Unit 4/ Reciprocating IC Engine

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 5 – Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

Section 6 – General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

2. FACILITY INFORMATION

2.1 Facility Description

The Caldwell compressor station operates remotely from NWPGP's headquarters, located in Salt Lake City, and is used to transmit natural gas along NWPGP's natural gas transmission pipeline. The station is operated to meet the demand of the transmission pipeline system rather than a fixed schedule. The arrangement of pipes and valves in the Caldwell pipe yard allows natural gas to be transmitted in either direction.

Natural gas entering the station passes through an in-line filter that removes any impurities from the natural gas stream. The natural gas is compressed by compressors, which are powered by four reciprocating IC engines, and is returned to the transmission pipeline system. The fuel for the reciprocating IC engines and other natural gas combustion equipment enters the station in a separate pipeline that originates in the pipe yard upstream of the in-line filter. Fuel gas is lowered from pipeline pressures to a pressure that is appropriate for the reciprocating IC engines in the fuel meter building. From the fuel meter building, natural gas is transported to the four reciprocating IC engines, the boiler, the five space heaters, and the emergency IC engine powering an electrical generator. The four reciprocating IC engines, boiler, and emergency IC engine all have their own exhaust stacks.

Lubricating oil for the reciprocating IC engines powering the natural gas compressors is stored in a storage tank at the facility. The lubricating oil flows on demand by gravity from the storage tank to a storage tank in the compressor building. When the reciprocating IC engines powering the natural gas compressors are operating, the lubricating oil circulates through the IC engines. The lubricating oil from the engines is then pumped to a heat exchanger located inside the compressor building. Coolant from the heat exchanger is then pumped to a fan-assisted cooler located outside of the compressor building. Oil that may leak from the lubricating oil systems is captured by a drainage system and conveyed to a sump. From the sump, the used oil is pumped to the used-oil storage tank for subsequent transportation for off-site recycling.

2.2 Facility Permitting History

2.2.1 Tier I Operating Permit History – Previous 5-year permit term November 1, 2005 to September 30, 2010

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from November 1, 2005 to September 31, 2010. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

March 21, 2008	T1-2007.0213, Administrative amendment to change the name of the permittee from Northwest Pipeline Corporation to Northwest Pipeline GP. (A, will be S as a result of this project).
February 24, 2006	T1-030034, Previous Tier I permit renewal (S)

2.2.2 Underlying Permit History – Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

March 21, 2008	Tier I operating permit T1-2007.0213, Permit status (A, will be S as a result of this project)
February 24, 2006	T1-030034, Previous Tier I permit renewal (S)
May 27, 2004	NWP requests to change the name of the responsible official
May 13, 2004	NWP requests permit amendments be incorporated into the permit renewal process
March 6, 2003	The Tier I Operating Permit was amended to change name of responsible official
January 4, 2001	The facility was issued Tier I Operating Permit No. 045-00004
November 22, 1996	The facility was issued PTC 027-00061, the PTC for Unit 4, the Cooper Bessemer model GMVH-8 reciprocating IC engine, Permit status (A)
September 9, 1996	A PTC was issued for installation of a turbocharger on an existing IC engine

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit.

3.2 Application Chronology

August 20, 2010	DEQ received an application from NWPGP to renew the facility's effective Tier I operating permit.
September 19, 2010	DEQ determined the application complete
December 21, 2010	DEQ provided the draft permit to the facility for review
January 24, 2011	DEQ provided the Tier I operating permit for public comment and affected states review. Public comment and affected states review ended on February 23, 2011
March 2, 2011	DEQ provided the proposed permit to EPA Region 10 for review
March 18, 2011	DEQ issued the final permit to the facility

4. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

The primary emissions from the Rathdrum facility are gaseous emissions formed as combustion by-products during operations of the reciprocating IC engines. The primary emissions of concern are NO_X, CO, PM_{10}, SO_2, and VOC. HAP emissions from the facility are below major source thresholds of 10 T/yr of any single HAP and below 25 T/yr for any combination of HAPs.

No changes have occurred at the facility during the previous five that would increase the facility's emissions compared to the previous Tier I operating permit term.

4.1 Process No. 1 – RECIPROCATING IC ENGINES

Table 4.1 lists the emissions units and control devices associated with the reciprocating IC engines.

Table 4.1 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Unit 1	Reciprocating IC engine	None	Unit 1 IC engine exhaust stack
Unit 2	Reciprocating IC engine	None	Unit 2 IC engine exhaust stack
Unit 3	Reciprocating IC engine	None	Unit 3 IC engine exhaust stack
Unit 4	Reciprocating IC engine	Clean burn technology	Unit 4 IC engine exhaust stack

Process Description:

Four natural gas-fired IC engines, Units 1, 2, 3, and 4, are used to power natural gas compressors at this facility. Units 1, 2, and 3 are Cooper Bessemer, model GMWA-6, 2-stroke lean burn IC engines each rated at a maximum of 1,450 bhp. These three IC engines were installed at the facility in 1956. Unit 4 is a Cooper Bessemer, model GMVH-8, 2-stroke lean burn IC engine rated at a maximum of 2,088 bhp. This IC engine was installed at the facility in 1981.

4.2 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 4.2 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

Table 4.2 INSIGFIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit/Activity	Regulatory Authority/Justification
One boiler (natural gas-fired)	(b)(i)5
One emergency IC engine powering an electrical generator (natural gas-fired)	(b)(i)5
Space heaters (natural gas-fired)	(b)(i)18
Natural gas pipeline and fuel system	(b)(i)30
Lubricating oil system: one 70 bbl and one 100 bbl used oil holding tanks, and a 277 bbl clean oil tank	a.1.4

Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The findings on which this shield is based are presented below:

Requirements for Which a Permit Shield Will Be Granted

The facility has not requested any permit shields as a result of this permit renewal.

Requirements for Which a Permit Shield Will Not Be Granted

The facility has not requested any permit shields as a result of this permit renewal.

4.3 Emissions Inventory

Tables 4.3 and 4.4 summarize the criteria pollutants and TAPs emissions inventory respectively for this facility. All values are expressed in units of tons per year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Listed below Table 4.3 are the references for the criteria pollutants emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix B of this statement of basis.

Table 4.3 EMISSIONS INVENTORY – CRITERIA POLLUTANT POTENTIAL TO EMIT (T/yr)

Emissions Unit Description	PM_{10}[a]	NO_X[b]	SO_2[c]	CO[d]	VOC[e]	Lead[f]	HAPs[g]
Reciprocating IC engine, Unit 1	2.24	280.03	0.03	14.00	42.00	0.0	3.68
Reciprocating IC engine, Unit 2	2.24	280.03	0.03	14.00	42.00	0.0	3.68
Reciprocating IC engine, Unit 3	2.24	280.03	0.03	14.00	42.00	0.0	3.68
Reciprocating IC engine, Unit 4	3.09	141.14	0.04	38.31	24.19	0.0	5.26
TOTAL EMISSIONS	**9.81**	**981.23**	**0.13**	**80.31**	**150.19**	**0.00**	**16.30**

a) PM_{10} (including filterable and condensable) emissions are based upon AP-42 (7/00) Table 3.2-1 for 2-stroke lean burn IC engines.
b) NO_x emissions are based upon the IC engine Manufacturer's specifications.
c) SO_2 emissions are based upon AP-42 (7/00) Table 3.2-1 for 2-stroke lean burn IC engines.
d) CO emissions are based upon the IC engine Manufacturer's specifications.
e) VOC emissions are based upon the IC engine Manufacturer's specifications.
f) AP-42 (7/00) Table 3.2-1 for 2-stoke lean burn IC engines list no emissions factor for lead emissions from 2-stroke lean burn IC engines.
g) Except for acetaldehyde, benzene, ethylbenzene, formaldehyde, and toluene HAP emissions are based upon AP-42 (7/00) Table 3.2-1 for 2-stoke lean burn IC engines. Acetaldehyde, benzene, ethylbenzene, formaldehyde, and toluene HAP emissions are based upon the IC engine Manufacturer's specifications.

Listed below Table 4.4 are the references for the TAPs pollutants emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix B of this statement of basis.

Table 4.4 EMISSIONS INVENTORY – TAPs/HAPs POLLUTANT POTENTIAL TO EMIT (T/yr)

Toxic Air Pollutants[a]	IC Engine 1 (T/yr)	IC Engine 2 (T/yr)	IC Engine 3 (T/yr)	IC Engine 4 (T/yr)	Total (T/yr)
1,1,2,2-Tetrachloroethane	3.07E-03	3.07E-03	3.07E-03	4.24E-03	**0.0135**
1,1,2-Trichloroethane	2.44E-03	2.44E-03	2.44E-03	3.37E-03	**0.0107**
1,3-Butadiene	3.80E-02	3.80E-02	3.80E-02	5.25E-02	**0.1665**
1,3-Dichloropropene	2.03E-03	2.03E-03	2.03E-03	2.80E-03	**0.0089**
2,2,4-Trimethylpentane	3.92E-02	3.92E-02	3.92E-02	5.42E-02	**0.1718**
2-Methylnaphthalene	9.92E-04	9.92E-04	9.92E-04	1.37E-03	**0.0043**
Acenaphthene	6.17E-05	6.17E-05	6.17E-05	8.51E-05	**0.0003**
Acenaphthylene	1.47E-04	1.47E-04	1.47E-04	2.03E-04	**0.0006**
Acetaldehyde	4.73E-04	4.73E-04	4.73E-04	6.53E-04	**0.0021**
Acrolein	3.61E-01	3.61E-01	3.61E-01	4.98E-01	**1.5810**
Anthracene	3.33E-05	3.33E-05	3.33E-05	4.60E-05	**0.0001**
Benz(a)anthracene	1.56E-05	1.56E-05	1.56E-05	2.15E-05	**0.0001**
Benzene	6.57E-02	6.57E-02	6.57E-02	9.07E-02	**0.2878**
Benzo(a)pyrene	2.63E-07	2.63E-07	2.63E-07	3.64E-07	**0.0000**
Benzo(a)fluoranthene	3.95E-07	3.95E-07	3.95E-07	5.45E-07	**0.0000**
Benzo(e)pyrene	1.08E-06	1.08E-06	1.08E-06	1.50E-06	**0.0000**
Benzo(g,h,i)perylene	1.15E-06	1.15E-06	1.15E-06	1.59E-06	**0.0000**
Benzo(k)fluoranthene	1.98E-07	1.98E-07	1.98E-07	2.73E-07	**0.0000**
Biphenyl	1.83E-04	1.83E-04	1.83E-04	2.53E-04	**0.0008**
Carbon Tetrachloride	2.81E-03	2.81E-03	2.81E-03	3.89E-03	**0.0123**
Chlorobenzene	2.06E-03	2.06E-03	2.06E-03	2.84E-03	**0.0090**
Chloroform	2.18E-03	2.18E-03	2.18E-03	3.02E-03	**0.0096**
Chrysene	3.12E-05	3.12E-05	3.12E-05	4.30E-05	**0.0001**
Ethylbenzene	3.29E-02	3.29E-02	3.29E-02	4.56E-02	**0.1443**
Ethylene Dibromide	3.40E-03	3.40E-03	3.40E-03	4.70E-03	**0.0149**
Fluoranthene	1.67E-05	1.67E-05	1.67E-05	2.31E-05	**0.0001**
Fluorene	7.84E-05	7.84E-05	7.84E-05	1.08E-04	**0.0003**
Formaldehyde	2.80	2.80	2.80	4.03	**12.43**
Indeno(1,2,3-c,d)pyrene	4.60E-07	4.60E-07	4.60E-07	6.36E-07	**0.0000**
Methanol	1.15E-01	1.15E-01	1.15E-01	1.59E-01	**0.5040**
Methylene Chloride	6.82E-03	6.82E-03	6.82E-03	9.41E-03	**0.0299**
n-Hexane	2.06E-02	2.06E-02	2.06E-02	2.85E-02	**0.0903**
Naphthalene	4.46E-03	4.46E-03	4.46E-03	6.16E-03	**0.0195**
PAH	6.21E-03	6.21E-03	6.21E-03	8.58E-03	**0.0272**
Perylene	2.30E-07	2.30E-07	2.30E-07	3.18E-07	**0.0000**
Phenanthrene	1.64E-04	1.64E-04	1.64E-04	2.26E-04	**0.0007**
Phenol	1.95E-03	1.95E-03	1.95E-03	2.70E-03	**0.0086**
Pyrene	2.71E-05	2.71E-05	2.71E-05	3.74E-05	**0.0001**
Styrene	2.54E-03	2.54E-03	2.54E-03	3.51E-03	**0.0111**
Toluene	6.57E-02	6.57E-02	6.57E-02	9.07E-02	**0.2878**
Vinyl Chloride	1.15E-03	1.15E-03	1.15E-03	1.58E-03	**0.0050**
Xylene	9.86E-02	9.86E-02	9.86E-02	1.72E-02	**0.3130**

[a] Except for acetaldehyde, benzene, ethylbenzene, formaldehyde, and toluene, HAPs emissions are based upon AP-42 (7/00) Table 3.2-1 for 2-stoke lean burn IC engines. Acetaldehyde, benzene, ethylbenzene, formaldehyde, and toluene HAP emissions are based upon the IC engine Manufacturer's specifications.

5. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Reciprocating IC engines, Units No. 1, No. 2, and No. 3 Emissions Limits;
- Reciprocating IC engine, Unit No. 4 Emissions Limits;
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, describe why and how the condition was changed. See instructions on the cover page for Appendix D for other options.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only", all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the MRRR for the facility-wide permit conditions has been paraphrased. Refer to the permit for the complete requirement.

5.1 Facility-wide Conditions

Permit Condition 2.1 – Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 2.2 through 2.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct a quarterly facility-wide inspection of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.
- Records of each fugitive dust inspection and corrective action taken are to be maintained at the permitted facility.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 2.5 – Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 2.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

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

Permit Condition 2.7 – Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/2/08T]

MRRR (Permit Condition 2.8)

- Conduct a quarterly facility-wide inspection during daylight hours and under normal operating conditions for the purposes of observing points of visible emissions from all emissions units subject to the visible emissions standards.
- Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition.

- Each inspection shall be conducted as follows:
    - Initial see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
        - Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions, and conduct another see/no see evaluation within 24 hours. If the visible emissions are not eliminated, the permittee shall comply with b).

OR

- Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If the measured opacity is greater than 20% for the time period specified in Section 625, the permittee shall take corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

- Records of each visible emission inspection and each opacity test and corrective action taken are to be maintained at the permitted facility.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Permit Condition 2.9 – Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

MRRR

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

Permit Condition 2.10 – Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

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

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

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Northwest Pipeline GP must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

However, if performance testing is required, it is to be conducted in accordance with IDAPA 58.01.01.157, including any and all monitoring, recordkeeping and reporting requirements. Emissions-unit specific MRRR will be listed within the permit condition requiring performance testing permit condition.

Permit Condition 2.11 – Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Northwest Pipeline GP must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.12 – Reports and Certifications

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

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

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Northwest Pipeline GP must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.13 – Open Burning

The permittee shall comply with the *Rules for Control of Open Burning,* IDAPA 58.01.01.600-623.
[IDAPA 58.01.01.600-623, 4/2/08T]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Northwest Pipeline GP must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.14 – Asbestos

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Northwest Pipeline GP must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.15 – Regulated Substances for Accidental Release Prevention

(a)
An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

(b)
This facility is subject to 40 CFR Part 68 and shall certify compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by 40 CFR 70.6(c)(5).

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 68.215(a)(ii)]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Northwest Pipeline GP must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.16 – Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Northwest Pipeline GP must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

5.2 Emissions Unit-Specific Emissions Limits and MRRR

This section of the statement of basis contains the emissions limits, emissions standards, and the monitoring, recordkeeping and reporting requirements (MRRR) for this facility. The regulatory authority to impose the permit conditions is included in the permit and is also listed below each permit condition as a regulatory citation. These permit conditions are the applicable requirements for this facility.

According to the Tier I renewal permit application no changes have occurred at the facility that would have increased the facility's emissions during the previous five year Tier I operating permit term. Thus, for this section of the statement of basis DEQ staff has used the same regulatory analysis from the existing previous Tier I operating permit that was issued to Northwest Pipeline GP on March 21, 2008. There is, however, a slight change in the regulatory analysis in this statement of basis to reflect changes to DEQ's most current Tier I operating permit template and also to reflect any amendment to the applicable NSPS requirements since the issuance of the initial Tier I operating permit to the facility. In this section of the statement of basis the existing permit conditions are identified as "Existing Permit Conditions," and if the existing permit condition has been revised, the revised permit conditions are identified as "Revised Permit Conditions."

Units 1, 2, and 3: Reciprocating IC Engines

Permit Condition 3.1, Visible Emissions – IDAPA 58.01.01.625

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity.

MRRR – (Permit Conditions 3.1 and 3.2)

A visible emissions evaluation is required for each stack at the facility, including the three reciprocating IC engines stacks, on a quarterly basis and in accordance with IDAPA 58.01.01.625. In addition, the three IC engines are required to combust natural gas exclusively. The combustion of natural ensures that there will be no visible emissions from the stacks of the IC engines. The compliance determination method for IDAPA 58.01.01.625 is Facility-Wide Permit Condition 2.8 – Visible Emissions and Permit Condition 3.2 - Natural Gas Combustion in the Three Reciprocating IC Engines.

Unit 4: Reciprocating IC Engine

Permit Condition 4.1, NO_X Emissions Limits, obtained from PTC No. 027-00061, issued 11/22/96

Emissions of NO_X from the reciprocating IC engine, Unit 4, shall not exceed any of the following emission rate limits: 32.2 lb/hr; 141 T/yr.

MRRR – (Permit Conditions 4.4, 4.5, and 4.6)

The facility is required to calculate NO_X emissions from the IC engine based upon fuel use or hours of operation using the results of the required biennial NO_X source test. The results of the source test are required to be reported to DEQ with 30 days after the completion of the source test.

Permit Condition 4.2, Visible Emissions – IDAPA 58.01.01.625

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity.

MRRR – (Permit Conditions 4.2 and 4.3)

A visible emissions evaluation is required for each stack at the facility, including the reciprocating IC engines stack, on a quarterly basis and in accordance with IDAPA 58.01.01.625. In addition, the IC engine is required to combust natural gas exclusively. The combustion of natural ensures that there will be no visible emissions from the stack of the IC engine. The compliance determination method for IDAPA 58.01.01.625 is Facility-Wide Permit Condition 2.8 – Visible Emissions and Permit Condition 4.3 - Natural Gas Combustion in the Reciprocating IC Engine.

5.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Provision 1 – General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

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

General Provision 2 – General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

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

General Provision 3 – General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

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

General Provision 4 – Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

General Provision 5 – Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If Northwest Pipeline GP files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

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

General Provision 6 – Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

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

General Provision 7 – Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

General Provision 8 – Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

General Provision 9 - Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

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

General Provision 10 – Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

General Provision 11 – Changes Requiring Permit Revision or Notice

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

General Provisions 12 and 13 – Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1) and (2)]

General Provision 14 – Inspection and Entry

Upon presentation of credentials, Northwest Pipeline GP shall allow DEQ or an authorized representative of DEQ to do the following:

a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

General Provision 15 – New Requirements During Permit Term

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

General Provision 16 - Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

General Provision 17 – Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

General Provision 18 – Renewal

a. Northwest Pipeline GP shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

General Provision 19 – Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or

   i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

c. Nothing in this permit shall alter or affect the following:

   i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;

   ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

   iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and

   iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

General Provision 20 – Compliance Schedule and Progress Reports

a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.

b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.

c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

General Provision 21 – Periodic Compliance Certification

Northwest Pipeline GP shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

a. The compliance certifications for all emissions units shall be submitted annually from January 1 – December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit.

b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;

c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

   i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;

ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;

iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

iv. Such information as the Department may require to determine the compliance status of the emissions unit.

d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

General Provision 22 – False Statements

Northwest Pipeline GP may not 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]

General Provision 23 – No Tampering

Northwest Pipeline GP may not 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]

General Provision 24 – Semiannual Monitoring Reports

In addition to all applicable reporting requirements identified in this permit, Northwest Pipeline GP shall submit reports of any required monitoring at least every six months. Northwest Pipeline GP's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

General Provision 25 – Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

General Provision 26 – Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

General Provision 27 - Emergency

In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

6. REGULATORY REVIEW

6.1 Attainment Designation (40 CFR 81.313)

The facility is located in Gem which is designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, CO, NO_2, SO_X, and Ozone. Reference 40 CFR 81.313.

6.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

Post project facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for NO_X and VOC, and 10 tons per year for any one HAP, formaldehyde, as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, as is subject to Tier I permitting requirements.

6.3 PSD Classification (40 CFR 52.21)

Post project facility-wide emissions from this facility have a potential to emit greater than 250 tons per year for NO_X as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, this facility is classified as a major stationary source, as defined in 40 CFR 52.21(b)(1), and is subject to PSD permitting requirements.

However, the facility is not undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore, in accordance with 40 CFR 52.21(a)(2), PSD permitting requirements do not apply.

6.4 NSPS Applicability (40 CFR 60)

Because the facility has petroleum storage tanks, natural gas compression equipment, and four spark-ignited IC engines the following NSPS requirements may apply to this facility:

- 40 CFR 60, Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
- 40 CFR 60, Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984
- 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or modification Commenced After July 23, 1984
- 40 CFR 60, Subpart KKK - Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants
- 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

40 CFR 60, Subpart K **Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984**

§ 60.110 Applicability and designation of affected facility.

Section (c) states that the requirements of this subpart apply to petroleum storage tanks which: (1) Have a capacity greater than 151, 416 liters (40,000 gallons), but not exceeding 246,052 liters (65,000 gallons), and commences construction or modification after March 8, 1974, and prior to May 19, 1978.

There are three petroleum storage tanks located at this facility which have capacities of 70 bbl (2,940 gal), 100 bbl (4,200 gal), and 277 bbl (11,634 gal). As no tank at this facility has a capacity of 40,000 gal or greater the requirements of Subpart K are not applicable to the three petroleum storage tanks located at this facility.

40 CFR 60, Subpart Ka **Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984**

§ 60.110a Applicability and designation of affected facility.

Section (a) states that the requirements of this subpart apply to affected facilities. Which, except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a storage capacity greater than 151,416 liters (40,000 gallons) that is used to store petroleum liquids for which construction is commenced after May 18, 1978.

Section (b) states that each petroleum liquid storage vessel with a capacity of less than 1,589,873 liters (420,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer is not an affected facility and, therefore, is exempt from the requirements of this subpart.

As stated previously there are three petroleum storage tanks located at this facility which have capacities of 70 bbl (2,940 gal), 100 bbl (4,200 gal), and 277 bbl (11,634 gal) and are not located at a petroleum production facility where there would be a "custody transfer." As no tank at this facility has a capacity of 40,000 gal or greater and the facility is not a petroleum production facility, the requirements of Subpart Ka are not applicable to the three petroleum storage tanks located at this facility.

40 CFR 60, Subpart Kb **Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or modification Commenced After July 23, 1984**

§ 60.110b Applicability and designation of affected facility.

Section (a) states that the requirements of this subpart apply to affected facilities. Which, except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (19,812 gal) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

Section (b) states that this subpart does not apply to storage vessels with a capacity greater than or equal to 151 m^3 (39,890 gal) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m^3 but less than 151 m^3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

As stated previously there are three petroleum storage tanks located at this facility which have capacities of 70 bbl (2,940 gal), 100 bbl (4,200 gal), and 277 bbl (11,634 gal). As no tank at this facility has a capacity of 19,812 gal or greater the requirements of Subpart Kb are not applicable to the three petroleum storage tanks located at this facility.

40 CFR 60, Subpart KKK **Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants**

§ 60.630 Applicability and designation of affected facility.

Section (a)(1) states that the requirements of this subpart apply to affected facilities in onshore natural gas processing plants.

§ 60.631 Definitions

Natural gas processing plant (gas plant) means any processing site engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both.

This facility is a natural gas compressor station and does not meet the definition of a "Natural gas processing plant." Therefore, this facility is not subject to the requirements of Subpart KKK.

40 CFR 60, Subpart JJJJ **Standards of Performance for Stationary Spark Ignition Internal Combustion Engines**

§ 60.4230 Am I subject to this subpart?

Section (a) states that the provisions of this subpart apply to **manufacturers**, and **owners and operators** of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

This facility is not a **manufacturer** of SI ICE. Therefore, the sections of this subpart that apply to stationary SI ICE manufacturers do not apply.

Section (4) specifies that owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:

> On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 hp (except lean burn engines with a maximum engine power greater than or equal to 500 hp and less than 1,350 hp);
>
> On or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 hp and less than 1,350 hp;
>
> On or after July 1, 2008, for engines with a maximum engine power less than 500 hp, or
>
> On or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 KW (25 hp).

Section (5) specifies that for **owners and operators** of stationary SI ICE that commence modification or reconstruction after June 12, 2006 the requirements of this subpart apply.

This facility has four SI ICE that were all constructed prior to June 12, 2006 and have not been modified or reconstructed after June 12, 2006. Specifically Units 1, 2, and 3 were manufactured in 1956 have not been modified or reconstructed after June 12, 2006, and Unit 4 was manufactured in 1981 have not been modified or reconstructed after June 12, 2006 per the Applicant. Therefore, the four SI ICEs located at this facility are not subject to the requirements of Subpart JJJJ.

6.5 NESHAP Applicability (40 CFR 61)

The Northwest Pipeline GP source is not an affected source subject to NESHAP in 40 CFR 61, and this permitting action does not alter the applicability status of existing affected sources at the facility.

6.6 MACT Applicability (40 CFR 63)

Because the facility has petroleum storage tanks and four full-time and one emergency spark-ignited IC engines the following NESHAP requirements may apply to this facility:

- 40 CFR 63, Subpart OO - National Emission Standards for Tanks - Level 1
- 40 CFR 63, Subpart WW - National Emission Standards for Storage Vessels (Tanks) - Control Level 2
- 40 CFR 63, Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR 63, Subpart OO **National Emission Standards for Tanks - Level 1**

§ 63.900 Applicability

The provisions of this subpart apply to the control of air emissions from tanks for which another subpart of 40 CFR parts 60, 61, or 63 references the use of this subpart for such air emission control. These air emission standards for tanks are placed here for administrative convenience and only apply to those owners and operators of facilities subject to the other subparts that reference this subpart. The provisions of 40 CFR part 63, subpart A—General Provisions do not apply to this subpart except as noted in the subpart that references this subpart.

As discussed previously in Section 6.4 – NSPS Applicability and Section 6.5 – NESHAP Applicability, there are no subparts that apply to the three petroleum storage tanks located at this facility. Therefore, the three petroleum storage tanks located at this facility are not subject to the requirements of Subpart OO.

40 CFR 63, Subpart WW **National Emission Standards for Storage Vessels (Tanks) - Control Level 2**

§ 63.1060 Applicability

The provisions of this subpart apply to the control of air emissions from storage vessels for which another subpart references the use of this subpart for such air emission control. These air emission standards for storage vessels are placed here for administrative convenience and only apply to those owners and operators of facilities subject to a referencing subpart. The provisions of subpart A (General Provisions) of this part do not apply to this subpart except as noted in the referencing subpart.

As discussed previously in Section 6.4 – NSPS Applicability and Section 6.5 – NESHAP Applicability, there are no subparts that apply to the three petroleum storage tanks located at this facility. Therefore, the three petroleum storage tanks located at this facility are not subject to the requirements of Subpart WW.

40 CFR 63, Subpart ZZZZ **National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

§ 63.6580 What is the purpose of subpart ZZZZ?

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. As demonstrated previously in the Emissions Inventories Section of this analysis this facility is a major source for HAPs as the potential to emit for formaldehyde is 12.43 T/yr. Therefore, the engines at this facility may be subject to the requirements of Subpart ZZZZ.

§ 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

Section (a) defines an affected source as any **existing, new,** or **reconstructed stationary** RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

Sections (1)(i) through (1)(iv) defines **existing** stationary RICE as the following:

> For stationary RICE with a site rating of more than 500 brake horsepower (bhp) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.
>
> For stationary RICE with a site rating of less than or equal to 500 brake bhp located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
>
> For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
>
> A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

Sections (2)(i) through (2)(iii) defines **new** stationary RICE as the following:

> A stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.
>
> A stationary RICE with a site rating of equal to or less than 500 bhp located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.
>
> A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

Section (3)(i) through (2)(iii) defines **reconstructed** stationary RICE as the following:

> A stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after December 19, 2002.
>
> A stationary RICE with a site rating of equal to or less than 500 bhp located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.
>
> A stationary RICE located at an area source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

Section (b) specifies which stationary RICE are subject to limited requirements of this subpart. An affected source which meets either of the criteria in paragraphs (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f). The requirements of (b)(1)(i) through (ii) are as follows:

> The stationary RICE is a **new** or **reconstructed** emergency stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions.
>
> The stationary RICE is a **new** or **reconstructed** limited use stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions.

Section (2) specifies that a **new** or **reconstructed** stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis must meet the initial notification requirements of §63.6645(f) and the requirements of §§63.6625(c), 63.6650(g), and 63.6655(c). These stationary RICE do not have to meet the emission limitations and operating limitations of this subpart.

Section (3) allows that the following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

> Existing spark ignition 2-stroke lean-burn (2SLB) stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;
>
> Existing spark ignition 4-stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;
>
> Existing emergency stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;
>
> Existing limited use stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions;
>
> Existing stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions that combusts landfill gas or digester gas equivalent to 10% or more of the gross heat input on an annual basis;
>
> Existing residential emergency stationary RICE located at an area source of HAP emissions;
>
> Existing commercial emergency stationary RICE located at an area source of HAP emissions; or

Existing institutional emergency stationary RICE located at an area source of HAP emissions.

As discussed previously in Section 4.1 – Process No. 1 - Reciprocating IC Engines, the four IC engines at this facility are 2-stroke lean-burn (2SLB) stationary RICE with a site rating of more than 500 bhp located at a major source of HAP emissions (see Section 4.3, Emissions Inventory). Section (3) of this subpart specifically exempts these types of IC engines. Therefore, the four reciprocating IC engines located at this facility are not subject to the requirements of Subpart ZZZZ. In addition, the one emergency IC engine was installed September 22, 2000. Section (1)(ii) exempts IC engines installed prior to June 12, 2006. Therefore, the one emergency IC engine is not subject to the requirements of Subpart ZZZZ.

6.7 CAM Applicability (40 CFR 64)

Individual permit units at facilities that are subject to Tile V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

1) The unit must have an emission limit for the pollutant;
2) The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

At this facility there are four units subject to Tier I permit requirements at this facility, the four reciprocating IC engines. Units 1, 2, and 3 have no explicit emissions limits stated in the permit. Therefore, CAM is not applicable to Units 1, 2, and 3. Unit 4 does have an explicit NO_X emissions limit stated in the permit. However, Unit 4 does not have any "add-on" controls for NO_X emissions from the IC engine. It is equipped with "clean burn technology" but this is not considered add-on control with respect to CAM applicability.

6.8 Acid Rain Permit (40 CFR 72-75)

The Northwest Pipeline GP source is not an affected source subject to the Acid Rain Permit program in 40 CFR 72-75.

7. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from January 24, 2011 to February 23, 2011. During this time, comments were not submitted in response to DEQ's proposed action.

8. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on March 2, 2011 via e-mail. On March 9, 2011, EPA Region 10 responded to DEQ via e-mail indicating that EPA will not be reviewing the proposed permit action, will not object to its issuance, and that the permit is now eligible for issuance.

Appendix A – AIRS Information

Appendix B – Emissions Inventory

AIRS/AFS Facility-wide Classification – Data Form

Facility Name: Northwest Pipeline GP, Caldwell Compressor Station

Facility Location: Section 34, T6S, R3E, Northeast of Caldwell

Facility ID: 045-00004 **Date:** March 15, 2011

Project/Permit No.: 60556/T1-2010.0102 **Completed By:** Darrin Pampaian

☒ Check if there are no changes to the facility-wide classification resulting from this action. (compare to form with last permit)
Comments: This project was for a Tier I permit renewal.

☐ Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassifiable) for the following pollutants:

	SO2	PM10	VOC
Area Classification:	A	A	A

DO NOT LEAVE ANY BLANK

Check one of the following:

☐ **SIP** [0] - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)

OR

☒ **Title V** [V] - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	B	A	B	B	B	A	A

☐ **PSD** [6] - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
☐	☐	☐	☐	☐	☐	☐

☐ **NSR - NAA** [7] - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
☐	☐	☐	☐	☐	☐	☐

☐ **NESHAP** [8] - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

☐ **NSPS** [9] - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
☐	☐	☐	☐	☐	☐	☐

☐ **MACT** [M] - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

THE AIRS/AFS FACILITY-WIDE CLASSIFICATION FORM IS REQUIRED ONLY FOR THE FINAL PERMIT. REV. 4/19/2010

AIRS/AFS Facility-wide Classification Form Guidance

AIRS/AFS Classification Codes:

For THAPs (Total Hazardous Air Pollutants) only:

- A = Use when any one HAP is emitted ≥10 T/yr **or** if the aggregate of all HAPS (Total HAPs) is ≥ 25 T/yr.
- SM = Use when limitations keep the HAPs from being emitted at or above the 10 or 25 T/yr threshold.
- B = Use when the potential to emit without permit restrictions is below either the 10 or 25 T/yr threshold.

For all other pollutants:

- A = Actual or potential emissions of a pollutant are ≥ the applicable major source threshold.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulation or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

Area Classification Codes:

A = Attainment N = Nonattainment U = Unclassifiable

- Classification designations are listed in 40 CFR Part 81.
- Where the listed designation is "Unclassifiable/ Attainment" for a pollutant, insert "U."
- CO and PM_{10} - Northern Ada County is "A" (within the boundaries of the former Northern Ada County CO and PM_{10} nonattainment area)
- PM_{10} - Power-Bannock Counties is "A" (the portion of the former Pocatello nonattainment area subject to state jurisdiction)dxdxxx

Maps: "Air Quality Planning Areas Including $PM_{2.5}$" in the TRIM Permit Writers' Toolbox (TRIM Record No. 2009ACF18)
http://global.deq.idaho.gov/website/emissions/viewer.htm

Yes, this facility is an SM80 source

Check this box if the facility is a synthetic minor, and the permit sets the emission limits at:

- 80 tons per year or more for SO2, NOX, CO, PM10, PT, or VOC **and/or**
- 8 tons per year or more of a single HAP **and/or**
- 20 tons per year or more of THAP

If not, leave blank.

SIP - Yes, this facility is subject to SIP requirements

All Idaho permits are issued in accordance with the Idaho SIP. This box should be checked unless the facility is a TV source. The SIP box and the Title V box should never both be checked.
Identify the classification (A, SM, B, C, or ND as defined above) of those pollutants listed that apply to the facility.

TITLE V - Yes, this facility is subject to Title V requirements

Check the box if the facility is a TV source. The SIP box and the Title V box should never both be checked.
Identify the classification (A, SM, B, C, or ND as defined above) of those pollutants listed that apply to the facility.

PSD - Yes, this facility is subject to PSD requirements

Check the box if the facility has a PSD permit. Do not check if a facility takes permit limits to prevent triggering PSD.
Also check the box for those pollutants listed if they apply to PSD.

NSR - NAA - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements

Check the box if the facility is required to comply with NSR nonattainment area requirements (IDAPA 58.01.01.204).
Also check the box for those pollutants listed that apply to NSR - NAA.

NESHAP - Yes, this facility is subject to NESHAP (Part 61) requirements

Check the box if the facility is subject to comply with NESHAP requirements (40 CFR 61).
If the facility is subject to NESHAP, enter the CFR subpart(s).

NSPS - Yes, this facility is subject to NSPS (Part 60) requirements

Check the box if the facility is required to comply with NSPS requirements (40 CFR 60).
If the facility is subject to NSPS, enter the CFR subpart(s).
Also check the box for those pollutants listed that apply to NSPS.

MACT - Yes, this facility is subject to MACT (Part 63) requirements

Check the box if the facility is subject to comply with MACT requirements (40 CFR 63).
If the facility is subject to MACT, enter the CFR subpart(s).

How to Save AIRS Classification Form in TRIM

It is recommended that the AIRS Form be a separate document from the Statement of Basis (SOB). Save the form in TRIM as a "Word file" directly under the container level, not in the project folder, with a name similar to: *Facility Name Project # AFS Classification Form.*

THE AIRS/AFS FACILITY-WIDE CLASSIFICATION FORM IS REQUIRED ONLY FOR THE FINAL PERMIT. REV. 4/19/2010

Cooper Bessemer model GMWA-6 IC Engines, Units 1, 2, and 3, PTE Emissions Calculations:

For the three Cooper Bessemer model GMWA-6 natural gas-fired IC engines the Applicant has supplied the fuel consumption at full rated horsepower and the full rated horsepower of each IC engine. Therefore, the heat input to each engine is calculated as follows:

Fuel $Use_{IC\text{-}Engine}$ (MMBtu/hr) = Fuel consumption (Btu/bhp-hr) x Rated Horsepower of IC engine (bhp) ÷ 1,000,000 Btu/MMBtu

Fuel $Use_{IC\text{-}Engine}$ MMBtu/hr = 7,300 Btu/bhp-hr x 1,450 bhp ÷ 1,000,000 Btu/MMBtu

Fuel $Use_{IC\text{-}Engine}$ MMBtu/hr = 10.59 MMBtu/hr

Table B.1 IC ENGINE UNITS 1, 2, and 3 HOURLY AND ANNUAL PTE FOR PM_{10} and SO_2 POLLUTANTS

Emissions Unit	Rated Heat Input (MMBtu/hr)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant[1]	Emissions Factors (lb/MMBtu)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Units 1, 2, and 3	10.59	8,760	PM_{10}	0.04831	0.51	2.24
			SO_2	0.000588	0.01	0.03

[1] – Based on AP-42 Table 3.2-1 (7/00) for PM_{10} (including filterable and condensable) and SO_2 for 2-stroke lean-burn IC engines combusting natural gas.

Table B.2 IC ENGINE UNITS 1, 2, and 3 HOURLY AND ANNUAL PTE FOR NO_X, CO, and VOC POLLUTANTS

Emissions Unit	Rated Power (bhp)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant[1]	Emissions Factors (g/bhp-hr)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Units 1, 2, and 3	1,450	8,760	NO_X	20.00	63.93	280.03
			CO	1.00	3.20	14.00
			VOC	3.00	9.59	42.00

[1] – Based on the Manufacturer's guarantee NO_X, CO, and VOC.

Table B.3 IC ENGINE UNITS 1, 2, and 3 HOURLY AND ANNUAL PTE FOR TAPs/HAPs POLLUTANTS

Emissions Unit	Rated Heat Input (MMBtu)	Rated Power (bhp)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant[1]	Emissions Factors (lb/MMBtu)[1] or (g/bhp-hr)[2]	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Units 1, 2, and 3	10.59	1,450	8,760	1,1,2,2-Tetrachloroethane	6.63E-05	0.00070	0.00308
				1,1,2-Trichloroethane	5.27E-05	0.00056	0.00244
				1,3-Butadiene	8.20E-04	0.00868	0.03804
				1,3-Dichloropropene	4.38E-05	0.00046	0.00203
				2,2,4-Trimethylpentane	8.46E-04	0.00896	0.03924
				2-Methylnaphthalene	2.14E-05	0.00023	0.00099
				Acenaphthene	1.33E-06	0.00001	0.00006
				Acenaphthylene	3.17E-06	0.00003	0.00015
				Acetaldehyde (g/bhp-hr)	3.38E-05	0.00011	0.0004733
				Acrolein	7.78E-03	0.08239	0.36087
				Anthracene	7.18E-07	0.00001	0.00003
				Benz(a)anthracene	3.36E-07	0.00000	0.00002
				Benzene (g/bhp-hr)	4.69E-03	0.00000	0.06567
				Benzo(a)pyrene	5.68E-09	0.00000	0.00000
				Benzo(a)fluoranthene	8.51E-09	0.00000	0.00000
				Benzo(e)pyrene	2.34E-08	0.00000	0.00000
				Benzo(g,h,i)perylene	2.48E-08	0.00000	0.00000
				Benzo(k)fluoranthene	4.26E-09	0.00000	0.00000
				Biphenyl	3.95E-06	0.00004	0.00018
				Carbon Tetrachloride	6.07E-05	0.00064	0.00282
				Chlorobenzene	4.44E-05	0.00047	0.00206
				Chloroform	4.71E-05	0.00050	0.00218
				Chrysene	6.72E-07	0.00001	0.00003
				Ethylbenzene (g/bhp-hr)	2.35E-03	0.00751	0.03290
				Ethylene Dibromide	7.34E-05	0.00078	0.00340
				Fluoranthene	3.61E-07	0.00000	0.00002
				Fluorene	1.69E-06	0.00002	0.00008
				Formaldehyde (g/bhp-hr)	2.00E-01	0.63934	2.80033
				Indeno(1,2,3-c,d)pyrene	9.93E-09	0.00000	0.00000
				Methanol	2.48E-03	0.02626	0.11503
				Methylene Chloride	1.47E-04	0.00156	0.00682
				n-Hexane	4.45E-04	0.00471	0.02064
				Naphthalene	9.63E-05	0.00102	0.00447
				PAH	1.34E-04	0.00142	0.00622
				Perylene	4.97E-09	0.00000	0.00000
				Phenanthrene	3.53E-06	0.00004	0.00016
				Phenol	4.21E-05	0.00045	0.00195
				Pyrene	5.84E-07	0.00001	0.00003
				Styrene	5.48E-05	0.00058	0.00254
				Toluene (g/bhp-hr)	4.69E-03	0.01499	0.06567
				Vinyl Chloride	2.47E-05	0.00026	0.00115
				Xylene (g/bhp-hr)	7.04E-03	0.02250	0.09857
					Total HAPs	**0.83**	**3.68**

[1] – Based on AP-42 Table 3.2-1 (7/00) for PM_{10} (including filterable and condensable) and SO_2 for 2-stroke lean-burn IC engines combusting natural gas.

[2] – Acetaldehyde, benzene, ethylbenzene, formaldehyde, and toluene, HAPs emissions are based upon the IC engine Manufacturer's specifications.

Cooper Bessemer model GMVH-8 IC Engines, Unit 4, PTE Emissions Calculations:

For the one Cooper Bessemer model GMVH-8 natural gas-fired IC engines the Applicant has supplied the fuel consumption at full rated horsepower and the full rated horsepower of each IC engine. Therefore, the heat input to each engine is calculated as follows:

Fuel $Use_{IC\text{-}Engine}$ (MMBtu/hr) = Fuel consumption (Btu/bhp-hr) x Rated Horsepower of IC engine (bhp) ÷ 1,000,000 Btu/MMBtu

Fuel $Use_{IC\text{-}Engine}$ MMBtu/hr = 7,000 Btu/bhp-hr x 2,088 bhp ÷ 1,000,000 Btu/MMBtu

Fuel $Use_{IC\text{-}Engine}$ MMBtu/hr = 14.61 MMBtu/hr

Table B.4 IC ENGINE UNIT 4 HOURLY AND ANNUAL PTE FOR PM_{10} and SO_2 POLLUTANTS

Emissions Unit	Rated Heat Input (MMBtu/hr)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant[1]	Emissions Factors (lb/MMBtu)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 4	14.61	8,760	PM_{10}	0.04831	0.71	3.09
			SO_2	0.000588	0.01	0.04

[1] – Based on AP-42 Table 3.2-1 (7/00) for PM_{10} (including filterable and condensable) and SO_2 for 2-stroke lean-burn IC engines combusting natural gas.

Table B.5 IC ENGINE UNIT 4 HOURLY AND ANNUAL PTE FOR NO_X, CO, and VOC POLLUTANTS

Emissions Unit	Rated Power (bhp)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant[1]	Emissions Factors (g/bhp-hr)	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 4	2,088	8,760	NO_X	7.00	32.22	141.14
			CO	1.90	8.75	38.31
			VOC	1.20	5.52	24.19

[1] – Based on the Manufacturer's guarantee NO_X, CO, and VOC.

Table B.6 IC ENGINE UNIT 4 HOURLY AND ANNUAL PTE FOR TAPs/HAPs POLLUTANTS

Emissions Unit	Rated Heat Input (MMBtu)	Rated Power (bhp)	Annual Hours of Operation (hrs/yr)	Criteria Pollutant[1]	Emissions Factors (lb/MMBtu)[1] or (g/bhp-hr)[2]	Hourly Emissions (lb/hr)	Annual Emissions (T/yr)
Unit 4	14.61	2,088	8,760	1,1,2,2-Tetrachloroethane	6.63E-05	0.00097	0.00424
				1,1,2-Trichloroethane	5.27E-05	0.00077	0.00337
				1,3-Butadiene	8.20E-04	0.01198	0.05247
				1,3-Dichloropropene	4.38E-05	0.00064	0.00280
				2,2,4-Trimethylpentane	8.46E-04	0.01236	0.05414
				2-Methylnaphthalene	2.14E-05	0.00031	0.00137
				Acenaphthene	1.33E-06	0.00002	0.00009
				Acenaphthylene	3.17E-06	0.00005	0.00020
				Acetaldehyde (g/bhp-hr)	3.38E-05	0.00016	0.0006815
				Acrolein	7.78E-03	0.11367	0.49786
				Anthracene	7.18E-07	0.00001	0.00005
				Benz(a)anthracene	3.36E-07	0.00000	0.00002
				Benzene (g/bhp-hr)	4.69E-03	0.00000	0.09456
				Benzo(a)pyrene	5.68E-09	0.00000	0.00000
				Benzo(a)fluoranthene	8.51E-09	0.00000	0.00000
				Benzo(e)pyrene	2.34E-08	0.00000	0.00000
				Benzo(g,h,i)perylene	2.48E-08	0.00000	0.00000
				Benzo(k)fluoranthene	4.26E-09	0.00000	0.00000
				Biphenyl	3.95E-06	0.00006	0.00025
				Carbon Tetrachloride	6.07E-05	0.00089	0.00388
				Chlorobenzene	4.44E-05	0.00065	0.00284
				Chloroform	4.71E-05	0.00069	0.00301
				Chrysene	6.72E-07	0.00001	0.00004
				Ethylbenzene (g/bhp-hr)	2.35E-03	0.01082	0.04738
				Ethylene Dibromide	7.34E-05	0.00107	0.00470
				Fluoranthene	3.61E-07	0.00001	0.00002
				Fluorene	1.69E-06	0.00002	0.00011
				Formaldehyde (g/bhp-hr)	2.00E-01	0.92066	4.03247
				Indeno(1,2,3-c,d)pyrene	9.93E-09	0.00000	0.00000
				Methanol	2.48E-03	0.03623	0.15870
				Methylene Chloride	1.47E-04	0.00215	0.00941
				n-Hexane	4.45E-04	0.00650	0.02848
				Naphthalene	9.63E-05	0.00141	0.00616
				PAH	1.34E-04	0.00196	0.00857
				Perylene	4.97E-09	0.00000	0.00000
				Phenanthrene	3.53E-06	0.00005	0.00023
				Phenol	4.21E-05	0.00062	0.00269
				Pyrene	5.84E-07	0.00001	0.00004
				Styrene	5.48E-05	0.00080	0.00351
				Toluene (g/bhp-hr)	4.69E-03	0.02159	0.09456
				Vinyl Chloride	2.47E-05	0.00036	0.00158
				Xylene (g/bhp-hr)	7.04E-03	0.03241	0.14194
					Total HAPs	**1.18**	**5.26**

[1] – Based on AP-42 Table 3.2-1 (7/00) for PM_{10} (including filterable and condensable) and SO_2 for 2-stroke lean-burn IC engines combusting natural gas.

[2] – Acetaldehyde, benzene, ethylbenzene, formaldehyde, and toluene, HAPs emissions are based upon the IC engine Manufacturer's specifications.

Appendix C – Facility Comments for Draft Permit

The following comments were received from the facility on December 29, 2010:

Facility Comment: In the permit, Table 1.1: For IC Engines 1, 2, and 3 remove "lean burn" and for IC Engine 4 change "learn burn" to "clean burn."

DEQ Response: After further clarification from the facility both of these IC engine designations were left as "lean burn."

Facility Comment: In the SOB, Section 2.1: Make minor corrections to the Facility Description.

DEQ Response: The requested changes will be made.