



# **Air Quality Permitting Response to Public Comments**

**November 18, 2016**

**Tier I Operating Permit No. T1-2016.0018 Project 61697**

**Northwest Pipeline LLC, Mountain Home  
Mountain Home, Idaho**

**Facility ID No. 039-00022**

Prepared by:   
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AIR QUALITY DIVISION

**Final**

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## BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the draft Tier I operating permit to Northwest Pipeline LLC, Mountain Home from July 27 through August 27, 2016, in accordance with IDAPA 58.01.01.364. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

## PUBLIC COMMENTS AND RESPONSES

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

**Comment 1:** This facility is classified as a Tier 1 source due to the potential NO<sub>x</sub> emissions of 837.48 T/yr, significantly exceeding the 100 T/yr threshold. In addition to potential NO<sub>x</sub> emissions, this facility has the potential to emit 26.71 T/yr of volatile organic compounds (VOCs). This is important because these two constituents, along with sunlight, are the precursors for ozone formation. Ozone is one of the seven criteria pollutants listed in Idaho's Air Quality Rules.

Per IDAPA 58.01.01.202.c.vii, new or modified air permits for major stationary sources are required to demonstrate that they will not cause or significantly contribute to a violation of any national ambient air quality standard (NAAQS). We recognize that this renewal does not constitute an application for a new or modified source; however, after reviewing existing permitting documents available through DEQ's website, it is unclear if an ambient air impact analysis has been performed.

If not already done so, we believe DEQ should perform an ambient air impact analysis for this facility. This analysis should include modeling capable of calculating secondary reactions in the atmosphere that produce ozone from the available NO<sub>x</sub> and VOCs. One such resource capable of this analysis and cited in other DEQ documents is the Community Multi-Scale Air Quality (CMAQ) modeling system, though we leave the decision of which model to use ultimately to DEQ.

**Response 1:** This Tier I operating permit renewal is issued in accordance with IDAPA 58.01.01.300 through 399 (Rules). As the commenter has noted, these regulations do not require an applicant's demonstration of compliance with the National Ambient Air Quality Standards through dispersion modeling. Tier I operating permits, also known as Title V operating permits pursuant to the Clean Air Act, are designed to compile all applicable state and federal air quality requirements for an existing major facility into one document. The commenter has also noted that facilities that construct a new source or modify an existing source would be subject to conducting dispersion modeling to demonstrate either the new or modified source does not cause or significantly contribute to a violation of any applicable NAAQS.

Based on the information in the statement of basis of the facility's initial Tier I operating permit issued in 2001, Units 1, 2, and 3 generator engines were installed in 1956 which is before the Air Rules effective year of 1969; therefore, no analysis was required. Other emissions units, such as emergency generator and the small boiler, met the exemption criteria of the Rules; therefore, no modeling demonstration was required for these sources.

DEQ will consider your comment when assessing any air quality concerns identified for the respective airsheds.

**Appendix**

**Public Comments Submitted for**

**Tier I Operating Permit**

**T1-2016.0018 Project 61697**



208.345.6933 • PO Box 844, Boise, ID 83702 • [www.idahoconservation.org](http://www.idahoconservation.org)

8/22/2016

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Submitted via email: [shawnee.chen@deq.idaho.gov](mailto:shawnee.chen@deq.idaho.gov)

**RE: Tier 1 air quality permit renewal for Northwest Pipeline LLC - Caldwell**

Dear Ms. Chen;

Thank you for the opportunity to comment on the Tier 1 air quality permit renewal for the Northwest Pipeline LLC (NWP) facility located in Mountain Home, ID.

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

This facility is classified as a Tier 1 source due to the potential NO<sub>x</sub> emissions of 837.48 T/yr, significantly exceeding the 100 T/yr. threshold. In addition to potential NO<sub>x</sub> emissions, this facility has the potential to emit 26.71 T/yr of volatile organic compounds (VOCs). This is important because these two constituents, along with sunlight, are the precursors for ozone formation. Ozone is one of the seven criteria pollutants listed in Idaho's Air Quality Rules.<sup>1</sup>

Per IDAPA 58.01.01.202.c.vii, new or modified air permits for major stationary sources are required to demonstrate that they will not cause or significantly contribute to a violation of any national ambient air quality standard (NAAQS). We recognize that this renewal does not constitute an application for a new or modified source; however, after reviewing existing permitting documents available through DEQ's website<sup>2</sup>, it is unclear if an ambient air impact analysis has been performed.

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<sup>1</sup> See IDAPA 58.01.01.006.27

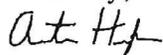
<sup>2</sup> Prior Permit and Statement of Basis for this facility found on DEQ's website:  
<http://www.deq.idaho.gov/permitting/issued-permits/?records=all&type=all&sort=nameAscending>

*RE: Idaho Conservation League comments on the Tier 1 air quality permit renewal for the Northwest Pipeline LLC – Mountain Home Facility*

If not already done so, we believe DEQ should perform an ambient air impact analysis for this facility. This analysis should include modeling capable of calculating secondary reactions in the atmosphere that produce ozone from the available NO<sub>x</sub> and VOCs. One such resource capable of this analysis and cited in other DEQ documents is the Community Multi-Scale Air Quality (CMAQ) modeling system, though we leave the decision of which model to use ultimately to DEQ.

Please do not hesitate to contact me at 208-345-6933 ext. 23 or [ahopkins@idahoconservation.org](mailto:ahopkins@idahoconservation.org) if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,



Austin Hopkins  
Conservation Assistant

*RE: Idaho Conservation League comments on the Tier 1 air quality permit renewal for the Northwest Pipeline LLC – Mountain Home Facility*