

# **Statement of Basis**

**Tier I Operating Permit No. T1-2016.0022**

**Project ID 62284**

**Gas Transmission Northwest, LLC - Compressor Station 03, Eastport  
Eastport, Idaho**

**Facility ID 021-00013**

**Final**

**September 4, 2019**

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**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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## 1. INTRODUCTION AND APPLICABILITY

Gas Transmission Northwest, LLC – Compressor Station 03, Eastport is a gas transmission company, and is located at US Highway 95 approximately 2.2 miles south of Eastport. 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 nitrogen oxides and carbon monoxide above the major source threshold of 100 tons-per-year.

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 Tier I operating permit for Gas Transmission Northwest, LLC – Compressor Station 03, Eastport.

The facility is changing its name, other than the name change nothing else changes at the facility. The emission inventory and regulatory review remains the same and can be seen in the May 2, 2017 Statement of Basis for T1-2016.0022, project 61702.

## 2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

### 2.1 Application Scope

This permit is an administrative amendment of the facility's currently effective Tier I operating permit to change the facility name from TransCanada GTN System, Eastport Station 3 to Gas Transmission Northwest, LLC – Compressor Station 03, Eastport.

### 2.2 Application Chronology

August 13, 2019                      DEQ received an application.

## 3. REVISED PERMIT CONDITIONS

The name of the permittee changed from TransCanada GTN System, Eastport Station 3 to Gas Transmission Northwest, LLC – Compressor Station 03, Eastport.

Permit Condition 5.10 was amended, as shown below with strikeouts, so that source testing is not required within 12 month of issuance of this revised permit. That intial test has already been conducted.

5.10    The permittee shall demonstrate compliance with the NO<sub>x</sub> ppm emission limits in Permit Conditions 5.1 and 5.3 using methods and procedures specified at 40 CFR 60.335.

- Testing shall be performed ~~during the first twelve months of the permit term and~~ within 12 months of any physical change to the combustion related components of the turbine. Combustion related components include, but are not limit to, the turbines compressor, combustion chamber, or fuel nozzles.
- For the annual NO<sub>x</sub> emission limit of Permit Condition 5.1 the permittee may presume the one time test to show compliance with the annual 42 ppmv NO<sub>x</sub> limit is equal to the annual average. If the result of the source test exceeds 42 ppmv the Permittee shall demonstrate compliance using one or both of the following methods:

1. Within 12 months of the initial test install, calibrate, maintain, and operate according to manufacturer specifications and a DEQ approved monitoring protocol a continuous emissions monitoring system (CEMS) to show compliance with the NO<sub>x</sub> emission limit.
2. The permittee shall conduct two additional performance tests, one within 180 days of the initial test and one within 360 days of the initial test. The results of the three tests shall be averaged.
  - Testing shall be performed at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine including the minimum point in the range and peak load or according to a DEQ approved alternative.
  - During each test run, the permittee shall record the following information:
    - (a) NO<sub>x</sub> concentration, ppm by volume
    - (b) Barometric pressure at test, mm Hg
    - (c) Humidity of ambient air, g H<sub>2</sub>O/g air
    - (d) Ambient temperature, K
    - (e) Fuel consumption, scf/hour

All other permit conditions remain unchanged.

#### **4. PUBLIC COMMENT**

In accordance with IDAPA 58.01.01.381.02.c, a public comment period is not required for an administrative amendment.

#### **5. EPA REVIEW OF PROPOSED PERMIT**

In accordance with IDAPA 58.01.01.381.02.c, EPA review of the proposed permit is not required. EPA will be provided a copy of the revised permit.