



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Brad Little, Governor
Jess Byrne, Director

January 19, 2021

Rick Duncan, Regional Director, Pipeline Operations
Gas Transmission Northwest, LLC – Compressor Station 05, Athol
700 Louisiana Street, Suite 700
Houston, TX 77002

RE: Facility ID No. 055-00033, Gas Transmission Northwest, LLC – Compressor Station 05, Athol
Final Permit Letter

Dear Mr. Duncan:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2019.0045 Project 62461 to Gas Transmission Northwest, LLC – Compressor Station 05 located at Athol for the permit modification to replace the existing 5B gas turbine as well as an existing emergency IC engine. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received June 8, 2020, and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately and replaces PTC No. P-2019.0045 issued on September 19, 2019. This permit does not release Gas Transmission Northwest, LLC – Compressor Station 05 from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

As requested, in accordance with IDAPA 58.01.01.209.05.b, a PTC and Tier I permit have been processed. Gas Transmission Northwest, LLC – Compressor Station 05 may operate the source after the PTC is issued so long as it does not violate any terms or conditions of the existing Tier I operating permit. The Tier I operating permit will be issued in accordance IDAPA 58.01.01.367.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Coeur d'Alene Regional Office, 2110 Ironwood Pkwy., Coeur d'Alene, ID 83814, Fax (208) 769-1404.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Almer Casile, Air Quality Analyst, at (208) 769-1422 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Mr. Duncan
January 19, 2021
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Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Kelli Wetzel at (208) 373-0502 or kelli.wetzel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS\kw

Permit No. P-2019.0045 PROJ 62461

Enclosures

Air Quality

PERMIT TO CONSTRUCT

,Permittee Gas Transmission Northwest, LLC – Compressor Station 05, Athol
Permit Number P-2019.0045
Project ID 62461
Facility ID 055-00033
Facility Location 2244 E. Seasons Road
Athol, ID 83801

Permit Authority

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

Date Issued January 19, 2021



Kelli Wetzel, Permit Writer



Mike Simon, Stationary Source Bureau Chief

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1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to replace an existing turbine (Unit 5B) with a new Solar turbine (Unit 5D), replace an existing engine with a new emergency engine, and add a fuel gas heart and five small space heaters.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2019.0045 issued on September 4, 2019.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Unit 5C Gas Turbine with Dry Low Emissions Combustor:</u> Manufacturer: Cooper-Rolls Model: Coberra 6000 Max Capacity: 35,000 hp, 26 MW Heat Input: 305.88 MMBtu/hr Construction Date: 1992 Serial No.: 1790271 Fuel: Natural gas	None
2	<u>Unit 5D Gas Turbine with SoLoNO_x:</u> Manufacturer: Solar Model: Titan 130 Max Capacity: 21,087 hp, 15 MW Heat Input: 169.79 MMBtu/hr Construction Date: 2021 Fuel: Natural gas	None
3	<u>Unit AUX-1 Emergency IC Engine:</u> Manufacturer: Caterpillar Model: G3512 Rated Horsepower: 1,827 hp Heat Input Rating: 13.05 MMBtu/hr Manufacture Date: 2020 Fuel: Natural gas	None
---	<u>Unit IA-1 Fuel Gas Heater:</u> Manufacturer: KWI Model: TBD Heat Input Rating: 1.00 MMBtu/hr Fuel: Natural gas	None
---	<u>Unit IA-2 Space Heaters (5):</u> Manufacturer: TBD Model: TBD Total Heat Input Rating: 0.36 MMBtu/hr Fuel: Natural gas	None

[1/19/2021]

2 Gas Turbines – Units 5C and 5D

2.1 Process Description

Two gas turbines, Units 5C and 5D, are used to compress natural gas in a pipeline.

2.2 Control Device Descriptions

Table 2.1 Gas Turbines Description

Emissions Units / Processes	Control Devices
Unit 5C – Cooper-Rolls Coberra 6000 with Dry Low Emissions Combustor	None
Unit 5D – Solar Titan 130 with SoLoNO _x	None

Emission Limits

2.3 Annual Average NO_x Emissions

Annual average NO_x emissions from Unit 5C shall not exceed 42 ppm by volume corrected to 15% O₂ on a dry ISO standard conditions basis as determined by EPA Method 20 or DEQ approved alternative.

[9/4/2019]

2.4 NO_x Emissions

NO_x emissions from Unit 5C shall not exceed 197 tons per any consecutive 12-month period (T/yr). NO_x emissions from Unit 5D shall not exceed 41.3 tons per any consecutive 12-month period (T/yr).

[1/19/2021]

Operating Requirements

2.5 Sulfur Requirements

No fuel containing sulfur in excess of 0.8% by weight shall be burned in Unit 5C.

[9/4/2019]

2.6 Fuel Limit

Unit 5C and Unit 5D shall be fired by natural gas exclusively.

[1/19/2021]

2.7 Natural Gas Usage

The maximum amount of natural gas combusted in Unit 5C shall not exceed 2,627,000,000 standard cubic feet per any consecutive 12-month period (scf/yr). The maximum amount of natural gas combusted in Unit 5D shall not exceed 1,458,160,000 standard cubic feet per any consecutive 12-month period (scf/yr).

[1/19/2021]

Monitoring and Recordkeeping Requirements

2.8 Natural Gas Usage Monitoring

The permittee shall monitor and record the natural gas throughput to Unit 5C and Unit 5D monthly and each consecutive 12-month period. Throughput shall be measured in standard cubic feet.

[1/19/2021]

NSPS Requirements

2.9 Applicable Requirements for Unit 5C

The permittee shall comply with the applicable requirements of 40 CFR 60, Subparts A and GG.

[1/19/2021]

2.10 Applicable Requirements for Unit 5D

The permittee shall comply with the applicable requirements of 40 CFR 60, Subparts A, and KKKK.

[1/19/2021]

3 Emergency IC Engine

3.1 Process Description

The emergency IC engine, Unit AUX-1, provides backup electrical power in the event that power from the local utility company is interrupted.

3.2 Control Device Descriptions

Table 3.1 Emergency IC Engine Description

Emissions Units / Processes	Control Devices
Unit AUX-1 - Caterpillar G3512, 1,827 hp, Natural gas	None

Operating Requirements

3.3 Fuel Limit

The emergency IC engine shall be fired by natural gas exclusively.

[1/19/2021]

NSPS Requirements

3.4 Applicable Requirements

The permittee shall comply with the applicable requirements of 40 CFR 60, Subparts A and JJJJ.

[1/19/2021]

4 General Provisions

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/1994]

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

[IDAPA 58.01.01.212.01, 5/1/1994]

Inspection and Entry

4.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/1994]

4.6 The permittee shall furnish DEQ written notifications as follows:

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

[IDAPA 58.01.01.211.01, 5/1/1994]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/1994]

Performance Testing

4.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

4.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

4.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/2000 and 4/11/2015]

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.211, 5/1/1994]

Excess Emissions

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

[IDAPA 58.01.01.130–136, 4/5/2000]

Certification

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

[IDAPA 58.01.01.123, 5/1/1994]

False Statements

- 4.13** No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/1998]

Tampering

- 4.14** No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/1998]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/2006]

Severability

- 4.16** The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/1994]