October 22, 1999

MEMORANDUM

TO: Sue Richards, Program Manager
Air Quality Permit Program

FROM: Bill Rogers, Air Quality Engineer
State Technical Services

SUBJECT: ***PERMIT TO CONSTRUCT TECHNICAL ANALYSIS***
P-990013, PG&E Gas Transmission - Northwest, Sandpoint
(Permit to Construct Modification, PTC No. 017-00037)

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.200 *(Rules for the Control of Air Pollution in Idaho)* for issuing Permits to Construct (PTC).

PROJECT DESCRIPTION

PG&E Gas Transmission - Northwest (PG&E GT-NW) has submitted a PTC application to modify the NO_x ton per year (T/yr) emission limits for the two compressor turbines located at their Sandpoint, Idaho natural gas compressor station (Compressor Station No. 4). PG&E GT-NW requests a facility-wide increase of 65 T/yr of NO_x (13 T/yr for Unit B and 52 T/yr for Unit C), and will draw upon its banked emission reduction credits (ERCs) for netting purposes. PG&E GT-NW has 73 T/yr of banked ERCs from the 1996 Unit B replacement, and this withdrawal of 65 T/yr will leave 8 T/yr banked. A PSD/BACT review was not triggered, because there will be no net increase in NO_x emissions.

The emissions increase is requested based on the results of emissions tests conducted in December 1998. The tests showed fuel consumption and NO_x emission rates above that represented by the turbine manufacturer prior to installation. Rather than restrict or curtail operations, PG&E GT-NW wishes to use its banked ERCs for maximum operational flexibility to meet delivery commitments. While the NO_x ppm levels tested well below the permit limits, the pound per hour and pound per thousand standard cubic foot rates were higher than expected and would not allow 8,760 hours of operation in a year.

SUMMARY OF EVENTS

On February 1, 1999, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received a PTC application from PG&E GT-NW. The application was determined complete on March 3, 1999. On September 17, 1999 the project was assigned to Bill Rogers, DEQ Air Quality Engineer, for completion.

DISCUSSION

1. Area Classification

   PG&E GT-NW's Compressor Station No. 4 is located 12 miles north of Sandpoint, Idaho in Bonner County. Bonner County is located in AQCR 63, Zone 11. Although Sandpoint and the surrounding area is considered non-attainment for PM-10 emissions, this facility lies outside the PM-10 non-attainment area. Subsequently, the area is designated as an attainment or unclassifiable area for all regulated criteria air pollutants.

2. Facility Classification

   A gas turbine is not a designated facility as defined in IDAPA 16.01.01.006.27. PG&E GT-NW's Compressor Station No.4 is a major facility as defined in IDAPA 16.01.01.006.55. The facility's actual emissions are greater than 250 tons per year; therefore, the facility is considered a PSD major facility. However, this permitting action does not result in a significant net increase of NO_x emissions; therefore,

PSD requirements do not apply. The compressor turbines are subject to federal New Source Performance Standards (NSPS) in accordance with 40 CFR 60, Subpart GG, because each has a heat input greater than ten gigajoules per hour (10 MMBtu/hr). The SIC code for the facility is 4922, and the facility is classified as A1.

3. Process Description

PG&E GT-NW operates a network of compressor stations that transmit natural gas from Canada to California along an underground pipeline system. The pipeline enters the United States in northern Idaho, continues through southeastern Washington and central Oregon, and enters California at its northern border. Each compressor station consists of one or more turbine-driven compressors that move the natural gas through the pipeline. The turbines use the natural gas in the pipeline as fuel and provide energy for the compressors to induce the flow of the gas.

Compressor Station No. 4 currently uses two turbine-driven compressors which were last modified in 1998. The turbines are referenced as Unit 4B and Unit 4C. Unit 4B is a Solar Mars 100S Low NO_x gas turbine with a maximum rated output capacity of 15,000 hp (ISO). Unit 4C is a standard, or non-low NO_x, Solar Mars T14000 gas turbine with a maximum rated output capacity of 14,100 hp (ISO).

4. Emission Estimates

4.1 NO_x Emission Offsets

This facility is an existing PSD major facility; therefore, any significant net emissions increase triggers PSD unless the emissions increase can be offset. The applicant has 73 T/yr of NO_x ERCs, or offsets, available to offset NO_x emission increases. However, in order to use offsets, they must be contemporary, creditable, and source-specific. The offsets are being used within ten years of the date in which they were banked; therefore, their use is contemporary with the modification. The offsets are creditable because the emissions reduction was made federally enforceable in a 1996 PTC. Finally, only natural gas-fired turbines are involved; therefore, the offsets are source-specific. Since these conditions are met, the offsets can be used in the netting equation to determine the net emissions change. That equation[1] is:

Net Emissions Change
EQUALS
Emission increases associated with the proposed modification
MINUS
Sourcewide creditable contemporaneous emission decreases
PLUS
Sourcewide creditable contemporaneous emission increases.

The net emission change in NO_x emissions is:

Net Emission Change = (65 - 0) T/yr - 73 T/yr + 0 T/yr = -8 T/yr.

This equation indicates that the net change in NO_x emissions is not significant; therefore, PSD is not triggered. (The significant emission rate for NO_x is 40 T/yr). Also as indicated, PG&E GT-NW has 8 T/yr of NO_x ERCs remaining.

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[1] New Source Review Workshop Manual (Research Triangle Park, NC: Office of Air Quality, Planning and Standards, DRAFT 1990) pp. A.34 and A.35.

4.2 Fuel Limitations and Emission Summary

Based on the results of the December 1998 performance test, PG&E GT-NW requests that the NO_x emission factor for Unit B be changed from 0.1 pounds per thousand standard cubic feet (lb/mscf) to 0.13 lb/mscf. No change is requested to the annual fuel consumption rate. For Unit C, PG&E GT-NW requests that the NO_x emission factor be changed from 0.66 lb/mscf to 0.73 lb/mscf and that the annual fuel consumption rates be increased to 963,600,000 standard cubic feet per year (scf/yr). Additionally, the PM factor is being updated based on the revised draft AP-42 section.

Using this data, a spreadsheet was developed to estimate the emissions increase from this modification. Table 1 summarizes the results of the emissions analysis. The spreadsheet is incorporated as Appendix A of this document.

Table 1. Emission Summary

EMISSIONS UNIT	POLLUTANT	PRE-MODIFICATION	POST-MODIFICATION	NET EMISSIONS CHANGE
		T/yr	*T/yr*	*T/yr*
UNIT 4B	SO2	1.6	1.6	0
	PM-10	1.3	4.1	+2.8
	NOx	60	73	+13
	CO	51	51	0
	VOC	1.8	1.8	0
UNIT 4C	SO2	1.3	1.4	+0.1
	PM-10	1.0	3.6	+2.6
	NOx	300	352	+52
	CO	56	59.4	+3.4
	VOC	1.0	1.1	+0.1

Facility-wide (Unit 4B + Unit 4C) increases in PM-10 (5.4 T/yr), CO (3.4 T/yr), SO_2 (0.1 T/yr), and VOCs (0.1 T/yr) are not significant. Therefore, PSD is not triggered for these pollutants. NO_x is the most limiting pollutant and is therefore the only pollutant specifically limited in the modified permit. It is assumed all other criteria air pollutants are inherently limited by the limit placed on throughput, and the fuel sulfur content limit in the case of SO_2.

5. Modeling

SCREEN3 modeling of this modification demonstrates compliance with all applicable ambient standards. A spreadsheet was developed to estimate the impact and compare the impact plus background to the NAAQS. The results indicate that no short-term ambient standard was exceeded; therefore, no short-term operating parameter (i.e. hourly, or daily) is required. Natural gas throughput has only to be limited annually to protect the allowable NO_x emission limit and protect the NAAQS for NO_x. However, monthly throughput monitoring is required, because that is the shortest time frame allowed by EPA for an annual standard. The modeling analysis is included as Appendix B of this document.

6. Regulatory Review

6.1 IDAPA 16.01.01.201 PTC Required

A PTC is required for this modification because it does not meet the exemption requirements specified in IDAPA 16.01.01.220 through .223.

6.2 IDAPA 16.01.01.210 Demonstration of Preconstruction Compliance with Toxic Standards

Compliance with toxic standards has been demonstrated.

6.3 IDAPA 16.01.01.577 Ambient Air Quality Standards for Specific Air Pollutants

Compliance with the NAAQS has been demonstrated.

6.4 Prevention of Significant Deterioration

Not applicable.

6.5 New Source Performance Standards 40 CFR 60

This facility is subject to federal regulation in accordance with 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines).

6.6 National Emission Standards for Hazardous Air Pollutants 40 CFR 61

Not applicable.

6.7 Maximum Achievable Control Technology Standards 40 CFR 63

Not applicable.

7. Permit Requirements

7.1 Emission Limits

7.1.1 NO_x Emissions - Unit 4B

NO_x limited to 223 ppmvd @ 15% oxygen to demonstrate compliance with 40 CFR 60.332. NO_x annual emission limited to 73 T/yr.

7.1.2 NO_x Emission - Unit 4C

NO_x limited to 220 ppmvd @ 15% oxygen to demonstrate compliance with 40 CFR 60.332. NO_x annual emission limited to 352 T/yr.

7.2 Operating Requirements

7.2.1 Fuel Throughput - Unit 4B

Natural gas throughput is limited to 111E9 scf/yr to demonstrate compliance with the 73 T/yr allowable NO_x emission rate limit for this emissions unit. (NOTE: THIS EMISSIONS UNIT USES LOW NO_x TECHNOLOGY)

7.2.2 Fuel Throughput - Unit 4C

Natural gas throughput is limited to 963.6E6 scf/yr to demonstrate compliance with the 352 T/yr allowable NO_x emission rate limit for this emissions unit.

7.3 Monitoring Requirements

7.3.1 Fuel Throughput

Requirement is to monitor and record the throughput of natural gas to Units 4B and 4C to demonstrate compliance with the fuel throughput limits.

7.3.2 Performance Test

The requirement to observe and record visible emissions during performance testing has been deleted. This is not a federal requirement in accordance with 40 CFR 60.335.

7.4 Reporting Requirements

7.4.1 Excess Emission Report

Required by federal mandate.

8. Permit Coordination

8.1 State Air Program

This document will be routed internally to be added to the Title V operating permit materials.

9. AIRS

The AIRS forms applicable to this permitting action are presented as Appendix C of this document.

10. Fees

This facility is a major facility as defined by IDAPA 16.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 16.01.01.525. According to the Air Emissions Database Master list for 1999, this facility has registered 293.3 tons by paying fees in accordance with IDAPA 16.01.01.527. This modification will increase the amount required to be registered by approximately $2,118.00 (70.6 T/yr x $30.00/T = $2,118.00).

RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that the PG&E Gas Transmission Northwest be issued modified PTC No. 017-00037 for their Compressor Station #4 located near Sandpoint, Idaho. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD Permit to Construct requirements.

BR/hs G:\AHW\ROGERS\PTC\PG&E\990013.TM

cc: Pat Rayne, AFS
Robert Wilkosz, TSB
Coeur d'Alene RO
Source File (017-00037)
COF

APPENDIX A

Emission Estimates

PG&E Gas Transmission-Northwest
P990013
October 1999

990013

PG&E GT-NW

UNIT 4C

POLLUTANT		MONTHLY THROUGHPUT MMSCF		ANNUAL THROUGHPUT MMSCF		EMISSION FACTOR lb/MMSCF		MONTHLY EMISSION RATE T/mo		ANNUAL EMISSION RATE T/yr		FACILITY INCREASE T/yr
SO2	POST	96360000		963600000		2.9		0.1		1.4		
	PRE	88000000		909000000		2.9		0.1		1.3		
							INCREASE	**0.0**	INCREASE	**0.1**		**0.1**
PM-10	POST	96360000		963600000		7.4		0.4		3.6		
	PRE	88000000		909000000		2.29		0.3		1.0		
						lb/mscf	INCREASE	**0.0**	INCREASE	**2.5**		**5.4**
NOx	POST	96360000		963600000		0.73		35.2		351.7		
	PRE	88000000		909000000		0.66		32.1		300.0		
				allowable		lb/hr	INCREASE	**3.1**	INCREASE	**51.7**	INCREASE	**64.0**
CO				56		12.8				59.4	**3.363696**	**3.4**
VOC				1		0.2				1.1	**0.060066**	**0.1**

UNIT 4B

POLLUTANT		MONTHLY THROUGHPUT MMSCF		ANNUAL THROUGHPUT MMSCF		EMISSION FACTOR lb/MMSCF		MONTHLY EMISSION RATE T/mo		ANNUAL EMISSION RATE T/yr		
SO2	POST	111000000		1110000000		2.9		0.2		1.6		
	PRE	92500000		1110000000		2.9		0.1		1.6		
							INCREASE	**0.0**	INCREASE	**0.0**		
PM-10	POST	111000000		1110000000		7.4		0.4		4.1		
	PRE	92500000		1110000000		2.29		0.3		1.3		
						lb/mscf	INCREASE	**0.1**	INCREASE	**2.8**		
NOx	POST	111000000		1110000000		0.13		40.5		72.2		
	PRE	92500000		1110000000		0.108		33.8		59.9		
				allowable		lb/hr	INCREASE	**6.8**	INCREASE	**12.2**	INCREASE	
CO				51		11.6				51.0	**0**	
VOC				1.8		0.4				1.8	**0**	

APPENDIX B

Modeling

PG&E Gas Transmission-Northwest
P990013
October 1999

PG&E Gas Transmission Northwest
P990013

Annual Fuel Consumption

Existing:		*Proposed:*		*Change:*	
Unit 4B	1110 MMscf/yr	1110 MMscf/yr		0 MMscf/yr	
Unit 4C	909 MMscf/yr	963.6 MMscf/yr		54.6 MMscf/yr	
TOTAL	**2019 MMscf/yr**	**2073.6 MMscf/yr**		**54.6 MMscf/yr**	
Maximum 1-hr concenration from modeling analysis:		23.59000 ug/m3/g/s	NOTE UNITS		

Toxic Air Pollutant (TAP) Analysis:

TAP	FUEL INCREASE *MMscf/yr*	EMISSION FACTOR *lb/MMscf*	EMISSION RATE *lb/hr*	EL *lb/hr*	AMBIENT IMPACT *ug/m3*	AACC *AAC ug/m3*	EXCEEDANCE y = YES BLANK = NO
Acetaldehyde	54.6	0.03700	0.00023	0.00300	0.00009	0.45	
Benzene	54.6	0.00790	0.00005	0.00080	0.00002	0.12	
Ethylbenzene	54.6	0.01320	0.00008	29.00000	0.00003	*21.75*	
Formaldehyde	54.6	1.89410	0.01181	0.00051	0.00439	0.077	
Mercury	54.6	0.00195	0.00001	0.00300	0.00000	*25*	
Toluene	54.6	0.07260	0.00045	25.00000	0.00017	*18750*	
Xylene	54.6	0.02890	0.00018	29.00000	0.00007	*21750*	

Criteria Air Pollutant Analysis:

POLLUTANT	AVERAGING PERIOD	EMISSION RATE *T/yr*	EMISSION RATE *lb/hr*	PERSISTANCE FACTOR	AMBIENT IMPACT *ug/m3*	BACKGROUND *ug/m3*	TOTAL IMPACT *ug/m3*	NAAQS *ug/m3*	EXCEEDANCE y = YES BLANK = NO
PM-10	24-HR	5.4	1.23288	0.40000	1.46710	86.00000	87.46710	150	
	annual	5.4	1.23288	0.08000	0.29342	32.70000	32.99342	50	
CO	1-HR	3.4	0.77626	1.00000	2.30933	11450.00000	11452.30933	40000	
	8-HR	3.4	0.77626	0.70000	1.61653	515.00000	516.61653	10000	
SO2	3-HR	0.1	0.02283	0.90000	0.06113	543.00000	543.06113	1300	
	24-HR	0.1	0.02283	0.40000	0.02717	144.00000	144.02717	365	
	annual	0.1	0.02283	0.08000	0.00543	23.50000	23.50543	80	
VOC	1-HR	0.1	0.02283	1.00000	0.22831	78.00000	78.22831	235	
NOx	annual	65	14.84018	0.08	0.01826	36.5	36.51826	100	

NOTE: The background for NOx is the predicted total facility impact as determined by a 1997 ambient analysis.

APPENDIX C

AIRS Information

PG&E Gas Transmission-Northwest
P990013
October 1999

GENERAL REPORT INFORMATION:

USER ID: PRY
REPORT NAME: C-PGT
FORMAT TYPE: SD
TITLE:

SELECTION CRITERIA:

REGN ME 10
SCSC ME 1601700037

SOURCE DATA INCLUDES:

PLANT LEVEL
POINT LEVEL

WITH ACTIONS
WITH COMMENTS

SORTING ELEMENTS:

JCL PARAMETERS:

ACCOUNT CODE: YIDA
FIMAS ID: AFSCP
TIME (MIN,SEC): 1 59
PRIORITY CODE: 2
MESSAGE CLASS: A
NUMBER OF COPIES: 1
FORM NUMBER:
ROOM/BIN NUMBER: HWET
HOLDING OUTPUT? N
PRINTER SITE ID: N59.U1002
OUTPUT FILES:

10/12/99

UNIT 4B – 20200201

NOx – 223 ppmv.d @ 15% O_2

– 73 T/yr

(Note: this unit used low NOx technology).

– 1,110,000,000 scf/yr ⇒ natural gas usage limit

UNIT 4C – 20200201

NOx – 220 ppmvd @ 15% O_2

– 352 T/yr

– 936,600,000 scf/yr

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00037 - PACIFIC GAS TRANSMISSION CO.
STATE: ID/16 CITY: - SANDPOINT
COUNTY: 017 - BONNER CO AQCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): 0 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

PLANT NAME: PACIFIC GAS TRANSMISSION CO.
ADDRESS : 1/2 MI. N. SAMUELS
CITY,STATE: SANDPOINT,ID 83864

DUNN & BRADSTREET: 048438675
EPA ID NUMBER : IDD984669945

STANDARD INDUSTRIAL CLASSIFICATIONS:
4922 - NATURAL GAS TRANSMISSION
-
-

LAST PLANT UPDATE : 97/08/22
REGIONAL PLANNING :
LOCAL CONTROL REGN:
INSPECTOR :
MONITORING INFORMATION:
SOURCE: AMBIENT:

MAILING ADDRESS:
NAME : PACIFIC GAS TRANSMISSION CO.
ADDRESS : 2100 SW RIVER PARKWAY
CITY,STATE: PORTLAND,OR 97201

SIGNIFICANT VIOLATOR FLAGS:

	STATE	EPA
COMPLIANCE	3 - IN COMPLIANCE - INSPECTIO	-
CLASSIFICATION	A1	
LAST INSPECT.	96/10/24 TYPE: 18	/ / TYPE:

OPERATING STATUS: 0 - OPERATING
STATE REGISTRATION:
PLANT DESCRIPTION: NAT.GAS TRANS. P.C.S. #4

GOVT FAC.: 0 - ALL OTHER FACILITIES NOT
CAPACITY: 0
COMPLIANCE CONTACT : DAVID STITT , (503) 833-4711

PRIORITY : -
CEMSS INFO (Y/N):

PLANT COMMENT:

INDIRECT SOURCE #	COMMENT NO.	COMMENT
	001 C	LOCAL ADDRESS: P.O. BOX 798, SANDPOINT, ID 83864
		CORP. ADDRESS: 2100 SW RIVER PARKWAY, PORTLAND, OR 97201
	002 C	NATURAL GAS TRANSMISSION PIPELINE COMPRESSOR STATION
		NO CONTROLS

AIR PROGRAM CODES:
0 - SIP 0 - OPERATING
INSPECTIONS:
EVEN YEAR : 92 STRATEGY: C FREQUENCY: 01
ODD YEAR : 93 STRATEGY: C FREQUENCY: 01

	STATE	EPA
COMPLIANCE	3 - IN COMPLIANCE - INSPECTIO	-
CLASSIFICATION	A1	

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00037 - PACIFIC GAS TRANSMISSION CO.
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COUNTY: 017 - BONNER CO AQCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): 0 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

REPEAT VIOLATION FLAG/DATE:
TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION: -
STAFF: ID1 - REGION I

RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -

AIR PROGRAM POLLUTANTS:

CO - CARBON MONOXIDE

LOADING: P - POTENTIAL CONTROLLED
RDE14 : 2
TOXICITY LEVEL:
STATE REGULATION NUMBER:

	STATE	EPA
COMPLIANCE	8 - NO APPLICABLE STATE REGUL	-
CLASSIFICATION	B	
ATTAIN/NONATTN	U - UNCLASSIFIED	-

PT - SUSPENDED PARTICULATE (TS

LOADING: P - POTENTIAL CONTROLLED
RDE14 : 2
TOXICITY LEVEL:
STATE REGULATION NUMBER:

	STATE	EPA
COMPLIANCE	3 - IN COMPLIANCE - INSPECTIO	-
CLASSIFICATION	B	
ATTAIN/NONATTN	U - UNCLASSIFIED	-

SO2 - SULFUR DIOXIDE

LOADING: P - POTENTIAL CONTROLLED
RDE14 : 2
TOXICITY LEVEL:
STATE REGULATION NUMBER:

	STATE	EPA
COMPLIANCE	3 - IN COMPLIANCE - INSPECTIO	-
CLASSIFICATION	B	
ATTAIN/NONATTN	U - UNCLASSIFIED	-

VOC - VOLATILE ORG COMPNDS

LOADING: P - POTENTIAL CONTROLLED
RDE14 : 2
TOXICITY LEVEL:
STATE REGULATION NUMBER:

	STATE	EPA
COMPLIANCE	3 - IN COMPLIANCE - INSPECTIO	-
CLASSIFICATION	B	
ATTAIN/NONATTN	U - UNCLASSIFIED	-

NO2 - NITROGEN DIOXIDE

LOADING: P - POTENTIAL CONTROLLED
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:

	STATE	EPA
COMPLIANCE	3 - IN COMPLIANCE - INSPECTIO	-
CLASSIFICATION	A1	
ATTAIN/NONATTN	A - ATTAINMENT AREA FOR A GIV	-

AIR PROGRAM CODES:

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00037 - PACIFIC GAS TRANSMISSION CO.
STATE: ID/16 CITY: - SANDPOINT
COUNTY: 017 - BONNER CO AQCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): 0 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

9 - NSPS 0 - OPERATING

INSPECTIONS:
EVEN YEAR : STRATEGY: FREQUENCY:
ODD YEAR : STRATEGY: FREQUENCY:
REPEAT VIOLATION FLAG/DATE:
TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION: -
STAFF: ID1 - REGION 1

	STATE	EPA
COMPLIANCE	3 - IN COMPLIANCE - INSPECTIO	-
CLASSIFICATION	A1	

RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -

AIR PROGRAM POLLUTANTS:

NO2 - NITROGEN DIOXIDE

LOADING: -
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:

	STATE	EPA
COMPLIANCE	3 - IN COMPLIANCE - INSPECTIO	-
CLASSIFICATION	A1	
ATTAIN/NONATTN	A - ATTAINMENT AREA FOR A GIV	-

ACT. NO.	INDIR. NO.	AIR PROGRM	TYPE/DESCRIPTION	DATE SCHEDULD	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY	RD8	PLLT/CASN RDE 16
001	0	11	ID PTC ISSUED	86/10/01	86/10/01		08	ISSUED	0		
002	0	03	START CONST.	86/11/07	86/11/07		01	ACTION ACHIEVED	0		
003	0	04	END CONSTR.	86/10/27	86/11/14		01	ACTION ACHIEVED	0		
004	0	17	ST COMP INSPEC	88/09/30	88/09/29	E34	19	IN COMPLIANCE	0		
005	0	18	SOURCE TST CON	87/10/01	87/10/01		01	ACTION ACHIEVED	0		

COMMENT NO.	COMMENT
001	ATHOL COMPRESSOR STATION, SOURCE TEST FOR NOX (2 TURBINES)

006	0	17	ST COMP INSPEC	89/09/30	/ /		02	NOT ACHIEVED	0		
007	0	11	ID PTC ISSUED	89/12/22	89/12/22		08	ISSUED	0		

COMMENT NO.	COMMENT

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00037 - PACIFIC GAS TRANSMISSION CO.
STATE: ID/16 CITY: - SANDPOINT
COUNTY: 017 - BONNER CO AQCR: 063

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AIR-PROGRAM CODE(S): 0 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

ACT. NO.	INDIR. NO.	AIR PROGRM	TYPE/DESCRIPTION	DATE SCHEDULD	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY	RD8	PLLT/CASN	RDE 16

COMMENT NO.	COMMENT
001	TURBINE UPGRADE-COMPLETELY REPLACES PREVIOUSLY PERMITTED
002	TURBINE - PT. #010

008	0		11 ID PTC ISSUED	90/02/20	90/02/20			08 ISSUED	0			

COMMENT NO.	COMMENT
001	PERMIT MODIFICATION ISSUED-INCREASE NOX LIMIT - PT. 010
002	PTC ISSUED FOR 12-MONTH PERIOD
003	EMISSION TEST DATA DUE TO DEPT. W/IN 30 DAYS OF TEST
004	CALENDAR QUARTERLY REPORTING REQUIRED-RPT. DUE W/IN 30 DAYS
005	AT END OF QUARTER

009	0		11 ID PTC ISSUED	90/05/29	90/05/29			08 ISSUED	0			

COMMENT NO.	COMMENT
001	PTC MODIFICATION ISSUED LIMITING OPERATION OF SOLAR MARS 14,600 HP TURBINE. 12-MONTH OPERATION PERIOD BEGINNING 7/1/90 AND ENDING 6/30/91
002	PER 8/21/90 DIV. LETTER (IN RESPONSE TO 7/6/90 CO. LETTER) - NEW START DATE, TURBINE TO BE OPERATED 9/1/90 TO 8/31/91
003	PER 4/19/91 CO. LETTER-14,600 HP SOLAR MARS ENGINE HAS BEEN REMOVED & 12,600 HP UNIT WAS REINSTALLED & BEGAN OPERATING 4/17/91

010	0		17 ST COMP INSPEC	90/09/30	90/09/25		E34	19 IN COMPLIANCE	0			
011	0		27 COMPANY ST	90/10/12	90/10/12			19 IN COMPLIANCE	0			

COMMENT NO.	COMMENT

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00037 - PACIFIC GAS TRANSMISSION CO.
STATE: ID/16 CITY: - SANDPOINT
COUNTY: 017 - BONNER CO AQCR: 063

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): 0 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

ACT. NO.	INDIR. NO.	AIR PROGRM	TYPE/DESCRIPTION	DATE SCHEDULD	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY	RD8	PLLT/CASN	RDE 16
	COMMENT NO.	COMMENT										
	001	SOURCE TEST REVIEWED BY D HARDESTY, EPA PER IAQB. TEST SHOWS BOARDERLINE COMPLIANCE WITH THE PPM LIMIT. EMISSION RATEE IS RIGHT AT THE PPH LIMIT. THERE WERE SEVERAL DEFICIENCIES IN THE TESTING. IT IS RECOMMENDED THAT THIS TEST NOT BE ACCEPTD										
012	0	17	ST COMP INSPEC	91/09/30	91/09/11		E34	19 IN COMPLIANCE	0			
013	0	03	START CONST.	90/09/27	90/09/27			01 ACTION ACHIEVED	0			
014	0	04	END CONSTR.	90/09/29	90/09/29			01 ACTION ACHIEVED	0			
015	0	RI	NEW SRCE START	90/10/03	90/10/03			01 ACTION ACHIEVED	0			
016	0	07	QTR REPORT DUE	91/01/30	91/01/23			01 ACTION ACHIEVED	0			
	COMMENT NO.	COMMENT										
	001	4TH QUARTER										
017	0	07	QTR REPORT DUE	91/04/30	91/04/23			01 ACTION ACHIEVED	0			
	COMMENT NO.	COMMENT										
	001	1ST QUARTER										
018	0	87	STTE WARN LETT	91/05/14	91/05/14			08 ISSUED	0			
	COMMENT NO.	COMMENT										
	001	DEFICIENCIES OF S.T. OF 14,600 HP SOLAR MARS TURBINE										

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

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AIR-PROGRAM CODE(S): 0 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

ACT. NO.	INDIR. NO.	AIR PROGRM	TYPE/DESCRIPTION	DATE SCHEDULD	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY	RD8	PLLT/CASN	RDE 16
019		0	85 SPEC ACT DUE/C	91/06/03	91/06/13			01 ACTION ACHIEVED	0			
	COMMENT NO.	COMMENT										
	001	RESPONSE TO 5/14/91 WARNING LETTER										
020		0	07 QTR REPORT DUE	91/07/30	91/07/30			01 ACTION ACHIEVED	0			
	COMMENT NO.	COMMENT										
	001	2ND QUARTER										
	002	FINAL QUARTERLY REPORT FOR COMPRESSOR UNIT 4C. IT WAS RE-MOVED FROM SERVICE 4/15/91										
	003	CO. SUBMITTED SUPPLEMENT 8/1/91 FOR 12,600 HP COMPRESSOR WHICH WAS REINSTALLED 4/17/91										
021		0	17 ST COMP INSPEC	92/09/30	/ /			02 NOT ACHIEVED	0			
022		0	07 QTR REPORT DUE	91/10/30	91/10/28			01 ACTION ACHIEVED	0			
	COMMENT NO.	COMMENT										
	001	3RD QUARTER - FINAL REPORT										
024		0	17 ST COMP INSPEC	93/09/30	/ /			02 NOT ACHIEVED	0			
025		0	28 INSP ATTEMPT	94/09/30	94/05/24		E34	13 NOT OPERATING	0			
	COMMENT NO.	COMMENT										
	001	TURBINES NOT OPERATING DUE TO LOW DEMAND OF NAT GAS										
026		09	11 ID PTC ISSUED	96/03/22	96/03/22			08 ISSUED	0			

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STATE: ID/16 CITY: - SANDPOINT
COUNTY: 017 - BONNER CO AQCR: 063
GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): 0 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

ACT. NO.	INDIR. NO.	AIR PROGRM	TYPE/DESCRIPTION	DATE SCHEDULD	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY	RD8	PLLT/CASN	RDE 16
	COMMENT NO.	COMMENT										
	001	MODIFICATION (TO REPLACE G.E. FRAME 3 GAS TURBINE WITH NEW SOLAR MARS T13000 SOLONOX GAS TURBINE)										
027	09	18	SOURCE TST CON	96/10/24	96/10/24				0			
	COMMENT NO.	COMMENT										
	001	TO MEASURE NO2/SO2 ON NEW SOLAR MARS T13000 SOLONOX TURBINE										
028	09	03	START CONST.	96/06/18	96/06/18			01 ACTION ACHIEVED	0			
029	09	04	END CONSTR.	96/08/30	96/08/30			01 ACTION ACHIEVED	0			
	COMMENT NO.	COMMENT										
	001	COMPRESSOR UNIT 4B										
030	09	RI	NEW SRCE START	96/08/30	96/08/30			01 ACTION ACHIEVED	0			
	COMMENT NO.	COMMENT										
	001	COMPRESSOR UNIT 4B -ACHVD MAX PROD										
031	09	I1	ID PTC ISSUED	96/11/21	96/11/21			08 ISSUED	0			
	COMMENT NO.	COMMENT										
	001	MODIFICATION (SO2 TESTING REQ'T CHANGED TO ALLOW FOR SULFUR CONTENT MONITORING, SECTION 3.3 OF PTC CHANGED TO ACCOMMODATE ALTERNATIVE METHODS, & INCREASED NO2 EMIS LIMITS)										