

# **Statement of Basis**

**Tier I Operating Permit No. T1-2019.0037**

**Project ID 62267**

**Idaho Power Co. – Evander Andrews Complex  
Mountain Home, Idaho**

**Facility ID 039-00024**

**Final**

**June 10, 2019**

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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. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
bhp	break horsepower
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
CO <sub>2e</sub>	CO <sub>2</sub> equivalent emissions
DAHS	Data acquisition and handling system
DEQ	Department of Environmental Quality
DLN	Dry low NO <sub>x</sub>
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
IPC	Idaho Power Company
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O <sub>2</sub>	oxygen
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
U.S.C.	United States Code
VOC	volatile organic compound

## 2. INTRODUCTION AND APPLICABILITY

Idaho Power Company (Idaho Power) operates the Evander Andrews Complex near Mountain Home, 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 CO and NO<sub>x</sub> above the major source threshold of 100 tons-per-year. At the time of this permitting action, the facility is not a major source of HAP emissions. As a major facility, Idaho Power is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit renewal must contain a certification from Idaho Power 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 Idaho Power.

The format of this Statement of Basis follows that of the permit. Idaho Power's Tier I operating permit is organized into sections. They are as follows:

### **Section 1 – Acronyms, Units, and Chemical Nomenclature**

The acronyms, units, and chemical nomenclature used in the permit are defined in this section.

### **Section 2 - Tier I Operating Permit Scope**

The scope describes this permitting action.

### **Section 3 - 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 (MRRR) sufficient to assure compliance with a permit condition follows the permit condition.

### **Sections 4 through 7 - Emissions Unit Requirements**

The emissions unit-specific sections of the permit contain the applicable requirements that specifically 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 Section. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements (MRRR) sufficient to assure compliance with an applicable requirement follows the applicable requirement.

### **Section 8 - 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.

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

### **Section 9 – Title IV Acid Rain Permit for Combustion Turbines CT1, CT2, and CT3**

This section of the permit, in accordance with IDAPA 58.01.01, Rules for the Control of Air Pollution in Idaho, and Titles IV and V of the Clean Air Act, issues a Title IV Acid Rain Permit for CT1, CT2, and CT3, pursuant to IDAPA 58.01.01.300. Where DEQ has provided a reprint of an applicable regulation, in the case of any discrepancy or conflict between the reprint and the CFR, the requirement in the CFR shall control.

## Section 10 - 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 facilities. The General Provisions have been reviewed by EPA and contain all terms and conditions required by IDAPA 58.01.01 et al as well as requirements from other air quality laws, rules 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 a rule or permit, the rule or permit shall govern.

### 3. FACILITY INFORMATION

#### 3.1 Facility Description

The Idaho Power Company (Idaho Power) operates the Evander Andrews Complex located near Mountain Home, Idaho. This is an electric power generating facility which currently utilizes two advanced Siemens-Westinghouse (S-W) 251B12A, simple cycle combustion turbines (CT2 and CT3) and generators. The heat input for each turbine is approximately 508 MMBtu/hr and the generating capacity is approximately 45 megawatts each. Both turbines are identical in design, fired only with natural gas, and are equipped with dry low NO<sub>x</sub> (DLN) burners. DLN burners combust a leaner mixture of fuel and air, thereby lowering the peak temperature and NO<sub>x</sub> emissions. During warm weather, evaporative cooling and inlet air fogging may be used to cool the turbine inlet air. Natural gas flow rates are measured continuously by a certified fuel flow monitoring system. Facility operations are monitored by an integrated microprocessor-based control system. Each combustion turbine is equipped with a continuous emissions monitoring system (CEMS) to measure NO<sub>x</sub>, carbon monoxide (CO), and diluent oxygen (O<sub>2</sub>). Also included is a data acquisition and handling system (DAHS) for data acquisition and analysis. These data systems are used during all facility operations, including startup and shutdown. Ancillary units at the facility include a natural gas-fired heater to heat the natural gas prior to combustion.

In 2007, the facility added a 170-megawatt (170-MW) Siemens Westinghouse Model SGT6-5000F (previously named W501F) simple-cycle combustion turbine (CT1) with generator and a GTS Energy, 3.8 MMBtu/hr natural gas-fired heater (H2) used to heat the natural gas prior to combustion in the turbine. The turbine is used to provide electrical power to meet peak system load requirements according to the facility.

In December of 2008, the facility added a 500 kW diesel-fired emergency standby internal combustion engine used to power an electrical generator.

#### 3.2 Facility Permitting History

##### Tier I Operating Permit History - Previous 5-year permit term April 2, 2015 to April 2, 2020

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from April 2, 2015 to April 2, 2020. 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).

April 2, 2015      T1-2014.0034, Tier I permit renewal, Permit status (S)

##### 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).

December 29, 2008      X-2008.0197, DEQ issued an exemption for an emergency diesel-fired IC engine to power an electrical generator, Permit status (A)

December 16, 2008      T1-2007.0158, Amend the Tier I operating permit to incorporate permit conditions of PTC No. P-060065, Permitting action description, Permit status (S)

May 1, 2007	PTC No. P-060065, Initial construction of a 170 MW turbine and 3.5 MMBtu/hr fuel heater, Permit status (A)
September 9, 2005	T1-2007.0158, DEQ issued the facility's initial T1 operating permit, Permit status (S)
March 18, 2005	PTC No. P-040031, Streamline permit conditions for consistency, Permit status (A)
August 21, 2002	PTC No. P-010051, Modification of permit requirements, Permit status (S)
July 19, 2002	PTC No. P-010051, Modification of permit requirements, Permit status (S)
September 14, 2001	PTC No. P-010742, Initial permit for facility construction, Permit status (S)

#### **4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY**

##### **4.1 Application Scope**

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

##### **4.2 Application Chronology**

July 12, 2019	DEQ received an application.
September 9, 2019	DEQ determined that the application was complete.
October 8, 2019	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 16, 2019	DEQ made available the draft permit and statement of basis for applicant review.
February 20, 2020	DEQ made available a second draft permit and statement of basis for applicant review with the co-processing of P-2020.0004.
March 10 – April 10, 2020	DEQ provided a public comment period on the proposed action.
April 23, 2020	DEQ provided the proposed permit and statement of basis for EPA review.
June 10, 2020	DEQ issued the final permit and statement of basis.

## 5. 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.

### 5.1 Process No. 1 – Combustion Turbine (CT1)

Table 5.1 lists the emissions units and control devices associated with combustion turbine CT1.

**Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
CT1	Combustion Turbine (CT1) Siemens-Westinghouse, Model SGT6-5000F Maximum Capacity: 170 MW Rated Heat Input: 1583 MMBtu/hr Constructed in 2007	Ultra-low NO <sub>x</sub> burners, good combustion control, and exclusive use of natural gas	Stack Height: 60 ft 24'9" by 21'10" rectangular duct Vertical exit Uncovered Eight internal baffles for sound suppression

The Idaho Power Evander Andrews Complex utilizes one Siemens-Westinghouse Model SGT6-5000F combustion turbine operated in simple cycle mode that is designated as CT1 to generate electricity. The unit has a generating capacity of approximately 170 MW, and natural gas will be used exclusively for fuel. Ancillary equipment includes a natural gas-fired fuel heater. The combustion turbine is equipped with Ultra Low-NO<sub>x</sub> combustion technology to minimize NO<sub>x</sub> emissions and the facility is monitored by an integrated, microprocessor-based control system. The system includes a data acquisition and handling system (DAHS) and a Continuous Emissions Monitoring System (CEMS) which operates at all times to monitor NO<sub>x</sub> and CO emissions, including startup and shutdown.

### 5.2 Process No. 2 – Combustion Turbines (CT2 and CT3)

Table 5.2 lists the emissions units and control devices associated with combustion turbines CT2 and CT3.

**Table 5.2 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
CT2	Combustion Turbine (CT2) Siemens-Westinghouse, Model W251B12A Serial No. 46S8140-1 Maximum Capacity: 45 MW Rated Heat Input: 492 MMBtu/hr Constructed in 2001	Dry Low NO <sub>x</sub> (DLN) burners, good combustion control, and exclusive use of natural gas	Stack Height: 75 ft 19'4" by 9'7" rectangular duct Vertical exit Uncovered Three internal baffles for sound suppression Exit flow rate: 900,000 acfm Stack exit temp: 841 to 1020 °F
CT3	Combustion Turbine (CT3) Siemens-Westinghouse, Model W251B12A Serial No. 46S8156-1 Maximum Capacity: 45 MW Rated Heat Input: 492 MMBtu/hr Constructed in 2001		

The Idaho Power Evander Andrews Complex utilizes two Siemens-Westinghouse Model W251B2A combustion turbines operated in simple cycle mode that are designated as CT2 and CT3. Each unit has a generating capacity of approximately 45 MW, and natural gas will be used exclusively for fuel. Operating

scenarios include firing with or without inlet air evaporative cooling and inlet air fogging. Ancillary equipment includes a natural gas-fired fuel heater. Each combustion turbine is equipped with dry low-NO<sub>x</sub> combustion technology to minimize NO<sub>x</sub> emissions and the facility is monitored by an integrated, microprocessor-based control system. The system includes a data acquisition and handling system (DAHS) and a Continuous Emissions Monitoring System (CEMS) which operates at all times to monitor NO<sub>x</sub> and CO emissions, including startup and shutdown.

**5.3 Process No. 3 – Fuel Heaters (H1 and H2)**

Table 5.3 lists the emissions units and control devices associated with fuel heaters H1 and H2.

**Table 5.3 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
H1	Fuel Heater H1 Thermoflux Inc., Model S.O. 9113 Rated Heat Input: 2.2 MMBtu/hr	None	Exhaust Stack
H2	Fuel Heater H2 GTS Energy Rated Heat Input: 3.8 MMBtu/hr	None	Exhaust Stack

Fuel heater H1 is used to heat natural gas before entering turbines CT2 and CT3. Fuel heater H2 is used to heat natural gas before entering turbine CT1. The manufacturer of H1 heater is Thermoflux, Inc., and the maximum heat input is approximately 2.2 MMBtu/hr. The manufacturer of H2 heater is GTS Energy, and the maximum heat input is approximately 3.8 MMBtu/hr. The heaters increase the temperature of the natural gas fuel to increase the combustion efficiency of the turbines and prevent damage by eliminating condensation.

**5.4 Process No. 4 –Emergency Electrical Generator**

Table 5.4 lists the emissions units and control devices associated with fuel heaters H1 and H2.

**Table 5.4 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
EG1	Emergency Electrical Generator Cummins, Model QSX15-G9 Nonroad 2 Compression Ignition Rated Horsepower: 755 bhp (500 kW) Constructed in 2007	None	Exhaust stack

The 500 kW diesel-fired emergency electrical generator will be used only as an emergency backup system in the event of a power failure. Hourly usage of the generator will also be monitored continuously with a non-resettable elapsed time meter.

**5.5 Insignificant Emissions Units Based on Size or Production Rate**

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. Table 5.5 lists the units and activities which have been determined to be insignificant on the basis of size or production rate. The regulatory authority for emissions units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

**Table 5.5 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION**

Emissions Unit / Activity	Regulatory Authority / Justification
VOC and gasoline storage tanks	58.01.01.317.01.b.i.(3)
Welding	58.01.01.317.01.b.i.(9)
Surface Coating	58.01.01.317.01.b.i.(17)
Cleaning and stripping activities	58.01.01.317.01.b.i.(26)

## 5.6 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 facility has not requested a permit shield.

## 5.7 Emissions Inventory

Table 5.6 summarizes the emissions inventory for this major 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 5.6 are the references for the 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 5.6 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)**

Source Description	PM <sub>10</sub> (T/yr)	NO <sub>x</sub> (T/yr)	SO <sub>2</sub> (T/yr)	CO (T/yr)	VOC (T/yr)	HAP (T/yr)	GHG CO <sub>2</sub> e (T/yr)
Combustion Turbine (CT1)	43.8	247	4.82	248	12.3	8.05	948,408
Combustion Turbine (CT2)	12	124	3.4	75	7.3	1.88	264,681
Combustion Turbine (CT3)	12	124	3.4	75	7.3	1.88	264,719
Fuel Heater (H1)	0.0	0.8	0.0	0.2	0.0	0.47	662
Fuel Heater (H2)	0.1	1.9	0.1	1.6	0.2	1.30	1,876
Emergency Diesel Generator (EG1)	0.1	2.0	0.0	1.1	0.1	0.001	2.6
<b>Total Emissions</b>	68	500	11.7	401	27.2	13.6	1,480,349

The emissions associated with the facility were established in the emissions inventories in the Statement of Basis for PTC No. P-060065 issued May 1, 2007 and PTC No. P-040031 issued March 18, 2005. The emissions associated with the Emergency Electrical Generator were established in the exemption concurrence, X-2008-0197, issued December 29, 2008.

## 6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this T1 facility.

This section is divided into the following subsections.

- Facility-Wide Conditions;
- Combustion Turbine CT1 Emissions Limits;
- Combustion Turbines CT2 and CT3 Emissions Limits;
- Fuel Heaters H1 and H2 Emissions Limits;

- Emergency Electrical Generator Emissions Limits;
- Tier I Operating Permit General Provisions.

***MRRR***

Monitoring, recordkeeping and reporting requirements (MRRR) are the means with which compliance with an applicable requirement is demonstrated. In this section, the applicable requirement (permit condition) is provided first followed by the MRRR. Should an applicable requirement not include sufficient MRRR 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 (i.e. gap filling). In addition to the specific MRRR provided for each applicable requirement, generally applicable facility-wide conditions and general provisions may also be provided, such as performance testing, reporting, and certification requirements.

The legal and factual basis for each permit condition is provided for in this document. If a permit condition was changed due to facility draft comments or public comments, an explanation of the changes is provided.

***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 following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

**6.1 Facility-Wide Conditions**

**Permit Condition 3.1 - 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 3.2 through 3.4)**

- 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; and
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

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

**Permit Condition 3.5 - 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 3.6)**

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint; and
- 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 3.7 - 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, 4/5/00]

### **MRRR (Permit Condition 3.8 through 3.9)**

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

### **Permit Conditions 3.10 through 3.14 - 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 the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

[IDAPA 58.01.01.130-136, 4/5/00]

### **MRRR (Permit Conditions 3.11 through 3.14)**

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory; and
- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ; and
- Maintain records of each excess emissions event.

[IDAPA 58.01.01.130-136, 4/5/00]

### **Permit Condition 3.15 – Fuel-Burning Equipment PM Standards**

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee 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 3.16 - Sulfur Content Limits**

The permittee shall not sell, distribute, use, or make available for use any of the following:

- Distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil, 0.3% by weight.
  - ASTM Grade 2 fuel oil, 0.5% by weight.
- Coal containing greater than 1.0% sulfur by weight.
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO<sub>2</sub> emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 3/29/10]

### **MRRR - (Permit Condition 3.17)**

The permittee shall maintain documentation of supplier verification of fuel sulfur content on an as received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

### **Permit Condition 3.18 - 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, 5/08/09]

### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee 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 3.19 - Asbestos**

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]

### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee 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 3.20 - Accidental Release Prevention**

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

### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee 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 3.21 - Recycling and Emissions Reductions**

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

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee 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 3.22 through 3.23- NSPS/NESHAP General Provisions**

This facility is subject to NSPS Subparts GG, KKKK, and IIII. The facility is also subject to NESHAP Subpart ZZZZ and is therefore required to comply with applicable General Provisions.

[40 CFR 60/63, Subpart A]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee 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 3.24 - 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 58.01.01.322.06, 07, 5/1/94]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee 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 Conditions 3.25 through 3.28 - 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.  
[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

### **MRRR (Permit Conditions 3.26 and 3.28)**

The permittee shall submit compliance test report(s) to DEQ following testing.  
[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

### **Permit Condition 3.29 - Reports and Certifications**

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.  
[IDAPA 58.01.01.322.08, 11, 5/1/94]

### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee 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 3.30 - Incorporation of Federal Requirements by Reference**

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.  
[IDAPA 58.01.01.107, 4/7/11]

### **MRRR**

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

## **6.2 Emissions Unit-Specific Emissions Limits and MRRR**

### **Combustion Turbine CT1**

#### **Permit Condition 4.1**

The permittee shall meet the emission limits specified in Table 1 of 40 CFR 60, Subpart KKKK.

When operating at or above 75% of peak load, the permittee shall not exceed the NO<sub>x</sub> limit of 15 ppm at 15% O<sub>2</sub> or 54 ng/J of useful output (0.43 lb/MWh) for new, modified, or reconstructed combustion turbines firing natural gas with a heat input at peak load (HHV) greater than 850 MMBtu/hr. The emissions limit is based on a 4-hour rolling average in accordance with 40 CFR 60.4350(g) and 60.4380(b)(1).

When operating below 75% of peak load, the permittee shall not exceed the NO<sub>x</sub> limit of 96 ppm at 15% O<sub>2</sub> or 590 ng/J of useful output (4.7 lb/MWh) for turbines operating at less than 75% of peak load. The emissions limit is based on a 4-hour rolling average in accordance with 40 CFR 60.4350(g) and 60.4380(b)(1).

For operating periods during which multiple emissions standards apply, the applicable standard is the average of the applicable standards during each hour. For hours with multiple emissions standards, the applicable limit for that hour is determined based on the condition that corresponded to the highest emissions standard.

**MRRR (Permit Conditions 4.4, 4.6, 4.12-4.14, 4.17-4.19, 4.22-4.24, 4.27)**

The facility is required to measure, monitor, and record the NO<sub>x</sub> concentration.

**Permit Condition 4.2**

In accordance with 40 CFR 60.4330, the permittee shall not cause to be discharged into the atmosphere from the subject stationary combustion turbine any gases which contain SO<sub>2</sub> in excess of 110 nanograms per Joule (ng/J) (0.90 pounds per megawatt-hour (lb/MWh)) gross output,

or

The permittee shall not burn in the subject stationary combustion turbine any fuel which contains total potential sulfur emissions in excess of 26 ng SO<sub>2</sub>/J (0.060 lb SO<sub>2</sub>/MMBtu) heat input.

**MRRR (Permit Conditions 4.4, 4.7-4.8, 4.15-4.17, 4.20-4.22)**

The facility is required to measure, monitor, and record the SO<sub>2</sub> concentration.

**Permit Condition 4.3**

The emissions from the CT1 stack shall not exceed any corresponding emissions rate limits listed in Table 4.3.

**Table 4.3 CT1 Emission Limits**

Source Description	NO <sub>x</sub>	CO
	T/yr <sup>(a)</sup>	T/yr
Combustion Turbine CT1	247.0	248.0

a) Tons per any consecutive 12-calendar month period.

**MRRR (Permit Conditions 4.6, 4.9-4.13, 4.17-4.19, 4.23-4.27)**

The facility is required to operate a CEMS for both NO<sub>x</sub> and CO, and to certify and QA all data. An alternative CO GCA and RATA schedule is specified in Permit Conditions 4.6 and 4.10 as requested by the applicant.

**Combustion Turbines CT2 and CT3**

**Permit Condition 5.1**

Emissions from combustion turbines 2 and 3 combined shall not exceed 248 tons per year of NO<sub>x</sub> and 150 tons per year of CO, based on any consecutive 12-month period. The annual limits shall include emissions during startup, shutdown, and malfunction of the turbines.

**MRRR (Permit Conditions 5.5-5.10, 5.12-5.16)**

The facility is required to operate a CEMS for both NO<sub>x</sub> and CO, and to certify and QA all data. An alternative CO CGA and RATA schedule is specified in Permit Conditions 5.5 and 5.8, as requested by the applicant.

**Permit Condition 5.2**

On and after the date on which the performance test is required by 40 CFR 60.8 is completed, the owner or operator shall not cause to be discharged to the atmosphere from gas turbines 2 or 3, any gases which contain NO<sub>x</sub> in excess of 142 parts per million by volume on a dry basis (ppmvd) at 15% oxygen in accordance with 40 CFR 60.332(a)(1). Any emissions which exceed this standard as a result of startup and shutdown shall be addressed in accordance with Permit Condition 5.16.

**MRRR (Permit Conditions 5.5, 5.6, 5.9, 5.10, 5.12-5.16)**

This NO<sub>x</sub> limit is established by NSPS and all monitoring, recordkeeping and reporting is specified under this subpart.

**Permit Condition 5.4**

No fuel containing sulfur in excess of 0.8% by weight shall be burned in gas turbines CT2 or CT3 in accordance with 40 CFR 60.333(b).

**MRRR (Permit Conditions 5.10, 5.11, 5.16)**

The facility is required to monitor fuel and conduct performance test to show compliance with the NSPS.

**Fuel Heaters H1 and H2**

**Permit Condition 6.1**

Emissions of PM from fuel heater H2 shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when fired with natural gas, as required by IDAPA 58.01.01.677.

**MRRR**

No specific monitoring is required for this condition. As with all permit conditions, the permittee 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 6.2**

The emissions from the H2 stacks shall not exceed any corresponding emissions rate limits listed in Table 6.2.

**Table 6.2 Fuel Heater H2 Emission Limits <sup>(a)</sup>**

Source Description	NO <sub>x</sub>	CO
	T/yr <sup>(b)</sup>	T/yr
Fuel Heater H2	1.91	1.60

(a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.

(b) Tons per any consecutive 12-calendar month period.

**MRRR (Permit Conditions 6.3, 6.4)**

The facility is required to measure, monitor, and record the fuel usage on a monthly basis.

**Permit Condition 6.3**

The volume of natural gas combusted in fuel heater H1 shall not exceed 11,114,353 cubic feet in any consecutive 12-month period.

The volume of natural gas combusted in fuel heater H2 shall not exceed 31,500,000 cubic feet in any consecutive 12-month period.

**MRRR (Permit Condition 6.4)**

The facility is required to monitor and record the volume of fuel usage on a monthly basis.

**Emergency Diesel Generator**

**Permit Condition 7.1**

The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade No. 1 fuel oil – 0.3% by weight (3000 ppmw).
- ASTM Grade No. 2 fuel oil – 0.5% by weight (5000 ppmw).

**MRRR (Permit Condition 7.10)**

The facility is required to verify fuel sulfur content through supplier documentation.

**Permit Condition 7.2**

The permittee shall certify the emergency electrical generator to the emission standards for new non-road CI engines in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants.

**MRRR (Permit Conditions 7.3-7.6)**

The facility is required to operate and maintain the emergency electrical generator according to approved procedures, use fuel meeting the requirements of 40 FR 80.5510(b) for non-road diesel fuel, install a non-resettable hour meter prior to startup, and install and configure the generator according to the manufacturer's specifications.

**Permit Condition 7.4**

The facility shall use diesel fuel in the emergency electrical generator that meets the requirements of 40 CFR 80.510(b) for non-road diesel fuel.

**MRRR (Permit Condition 7.8)**

The facility is required to record the fuel sulfur content through supplier documentation.

**Permit Condition 7.7**

The permittee must operate the emergency electrical generator according to the requirements below. In order for the engine to be considered an emergency stationary ICE under the subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, is prohibited. If the permittee does not operate the engine according to the requirements, the engine will not be considered an emergency engine under the subpart and must meet all requirements for non-emergency engines.

- There is no time limit on the use of emergency stationary ICE in emergency situations.
- The permittee may operate the emergency stationary ICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed counts as part of the 100 hours per calendar year.
  - Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or

operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year.

- Emergency stationary ICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §60.17), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-00203.
- Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

### **MRRR (Permit Condition 7.9)**

The facility is required to record the time of operation of the engine and the reason the engine was in operation during that time.

## **6.3 General Provisions**

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

### **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 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 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)]

### **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)]

### **Reopening, Permitting Actions**

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee 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)]

### **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)]

## **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)]

## **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)]

## **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)]

## **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)]

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)]

## **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), (2)]

## **Inspection and Entry**

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

- 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;
- 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; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

### **New Applicable Requirements**

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)]

### **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)]

### **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)]

### **Renewal**

The permittee 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)]

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)]

### **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:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
  - 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.
- 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).
- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - 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;

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

### **Compliance Schedule and Progress Reports**

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

### **Periodic Compliance Certification**

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified; and
- 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)]

### **False Statements**

The permittee 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]

### **No Tampering**

The permittee 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]

### **Semiannual Monitoring Reports.**

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[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)]

### **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)]

### **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)]

### **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)]

## **7. REGULATORY REVIEW**

### **7.1 Attainment Designation (40 CFR 81.313)**

The facility is located in Elmore County which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub>, and Ozone. Reference 40 CFR 81.313.

### **7.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

The Evander Andrews complex is a Title V classified facility because it is a major source for NO<sub>x</sub> and CO. It is subject to the Tier I operating permit requirements of IDAPA 58.01.01.300.

### **7.3 PSD Classification (40 CFR 52.21)**

The Evander Andrews complex has the potential to emit 250 tons per year or more of a regulated NSR pollutant; therefore it is classified as a PSD facility. However, since becoming a PSD facility, no modifications have been made to trigger any PSD requirements.

### **7.4 NSPS Applicability (40 CFR 60)**

Combustion turbine CT1 is subject to 40 CFR 60, Subpart KKKK. Combustion turbines CT2 and CT3 are subject to 40 CFR 60, Subpart GG. Applicable NSPS requirements are included in the Tier I permit. Additional discussion of the specific requirements regarding conditions and applicable dates can be found in the Statement of Basis for the Tier I operating permit, issued on December 16, 2008.

The emergency electrical generator is subject to 40 CFR 60, Subpart IIII. A discussion of the specific requirements regarding conditions and applicable dates can be found in the Statement of Basis for the Tier I operating permit, issued April 2, 2015.

### **7.5 NESHAP Applicability (40 CFR 61)**

The NESHAP provisions do not apply to this facility.

**7.6 MACT Applicability (40 CFR 63)**

The emergency electrical generator is subject to 40 CFR 63, Subpart ZZZZ; however the requirements of this subpart may be met by meeting the requirements of 40 CFR 60, Subpart IIII and no further requirements apply under this subpart.

**7.7 CAM Applicability (40 CFR 64)**

There is no pollution control equipment to make this rule applicable to this facility. Emissions are controlled by dry low-NO<sub>x</sub> combustion, achieved by reducing peak flame temperature and employing lean pre-mixed combustion. However, “control device” in the rule refers to literal control equipment, so compliance assurance monitoring does not apply to this facility.

**7.8 Acid Rain Permit (40 CFR 72-75)**

The Acid Rain Program requirements apply to all three combustion turbines. The discussion of the effective dates and the relationship of the Title IV Acid Rain program and its permit requirements of the Title V operating permit can be found in the Statement of Basis of the Tier I operating permit issued on December 16, 2008.

**8. PUBLIC COMMENT**

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from March 11, 2020 to April 10, 2020. During this time, comments WERE NOT submitted in response to DEQ's proposed action.

**9. 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 April 23, 2020 via the online the Electronic Permit System (EPS). On June 5, 2020, EPA Region 10 responded to DEQ via e-mail indicating that EPA Region 10 had no comments on this permitting action.

## **Appendix A - Emissions Inventory**

**Pre-Project Criteria PTE**

	CO	NOX	PM/PM10	SO2	VOC
Combustion Turbine (CT1)	248	247	43.8	4.82	12.3
Combustion Turbine (CT2)	75	124	12	3.4	7.3
Combsutin Turbine (CT3)	75	124	12	3.4	7.3
Fuel Gas Heater (H1)	0.2	0.8	0.0	0.0	0.0
Fuel Gas Heater (H2)	1.6	1.9	0.1	0.1	0.2
Emergency Fire Pump (FP1)	0.1	0.2	0.0	0.0	0.0
Emergency Diesel Generator (EG1)	1.1	2.0	0.1	0.0	0.1
<b>Total Facility Emissions</b>	<b>401</b>	<b>499.9</b>	<b>68</b>	<b>11.72</b>	<b>27.2</b>

**Post Project Criteria PTE**

	CO	NOX	PM/PM10	SO2	VOC
Combustion Turbine (CT1)	248	247	43.8	4.82	12.3
Combustion Turbine (CT2)	75	124	12	3.4	7.3
Combsutin Turbine (CT3)	75	124	12	3.4	7.3
Fuel Gas Heater (H1)	0.2	0.8	0.0	0.0	0.0
Fuel Gas Heater (H2)	1.6	1.9	0.1	0.1	0.2
Emergency Fire Pump (FP1)	0.1	0.2	0.0	0.0	0.0
<del>Emergency Diesel Generator (EG1)</del>	<del>1.1</del>	<del>2.0</del>	<del>0.1</del>	<del>0.0</del>	<del>0.1</del>
<b>Total Facility Emissions</b>	<b>399.9</b>	<b>497.9</b>	<b>67.9</b>	<b>11.72</b>	<b>27.1</b>

**Facility HAP PTE**

	CT1	CT2	CT3	H1	H2	EDG	FP1	<b>Total Facility Emissions</b>
1,3-Butadiene	3.4E-03	7.8E-04	7.8E-04				0.0E+00	<b>5.0E-03</b>
Acetaldehyde	3.1E-01	7.3E-02	7.3E-02			2.1E-05	7.1E-07	<b>4.6E-01</b>
Acrolein	5.0E-02	1.2E-02	1.2E-02			6.7E-06	2.2E-07	<b>7.4E-02</b>
Benzene	9.4E-02	2.2E-02	2.2E-02	1.2E-02	3.4E-02	6.6E-04	2.2E-05	<b>1.8E-01</b>
EthylBenzene	2.5E-01	5.8E-02	5.8E-02				0.0E+00	<b>3.7E-01</b>
Formaldehyde	5.6E+00	1.3E+00	1.3E+00	4.3E-01	1.2E+00	6.7E-05	2.2E-06	<b>9.8E+00</b>
Naphthalene	1.0E-02	2.4E-03	2.4E-03	3.5E-03	1.0E-02	1.1E-04	3.7E-06	<b>2.8E-02</b>
Propylene Oxide	2.3E-01	5.3E-02	5.3E-02				0.0E+00	<b>3.4E-01</b>
Toluene	1.0E+00	2.4E-01	2.4E-01	1.9E-02	5.5E-02	2.4E-04	8.0E-06	<b>1.6E+00</b>
Xylenes	5.0E-01	1.2E-01	1.2E-01			1.6E-04	5.5E-06	<b>7.4E-01</b>

**CT1**

Heat Input Rate 1788 MMBtu/hr  
Annual Operating Hours 8760

		1,3-Butadiene	Acetaldehyde	Acrolein	Benzene	EthylBenzene	Formaldehyde	Naphthalene	PAH	Propylene Oxide	Toluene	Xylenes
Emission Factors <sup>1</sup>	lb/MMBtu	4.30E-07	4.00E-05	6.40E-60	1.20E-05	3.20E-05	7.10E-04	1.30E-06	2.20E-06	2.90E-05	1.30E-04	6.40E-05
CT1 Emissions	lb/hr	7.69E-04	7.15E-02	1.14E-56	2.15E-02	5.72E-02	1.27E+00	2.32E-03	3.93E-03	5.19E-02	2.32E-01	1.14E-01
	T/yr	3.4E-03	3.1E-01	5.0E-56	9.4E-02	2.5E-01	5.6E+00	1.0E-02	1.7E-02	2.3E-01	1.0E+00	5.0E-01

<sup>1</sup> AP-42 Table 3.1-3**CT2**

Heat Input Rate 428 MMBtu/hr  
Annual Operating Hours 8760

		1,3-Butadiene	Acetaldehyde	Acrolein	Benzene	EthylBenzene	Formaldehyde	Naphthalene	PAH	Propylene Oxide	Toluene	Xylenes
Emission Factors <sup>1</sup>	lb/MMBtu	4.30E-07	4.00E-05	6.40E-60	1.20E-05	3.20E-05	7.10E-04	1.30E-06	2.20E-06	2.90E-05	1.30E-04	6.40E-05
CT1 Emissions	lb/hr	1.84E-04	1.71E-02	2.74E-57	5.14E-03	1.37E-02	3.04E-01	5.56E-04	9.42E-04	1.24E-02	5.56E-02	2.74E-02
	T/yr	8.1E-04	7.5E-02	1.2E-56	2.2E-02	6.0E-02	1.3E+00	2.4E-03	4.1E-03	5.4E-02	2.4E-01	1.2E-01

<sup>1</sup> AP-42 Table 3.1-3**CT3**

Heat Input Rate 428 MMBtu/hr  
Annual Operating Hours 8760

		1,3-Butadiene	Acetaldehyde	Acrolein	Benzene	EthylBenzene	Formaldehyde	Naphthalene	PAH	Propylene Oxide	Toluene	Xylenes
Emission Factors <sup>1</sup>	lb/MMBtu	4.30E-07	4.00E-05	6.40E-60	1.20E-05	3.20E-05	7.10E-04	1.30E-06	2.20E-06	2.90E-05	1.30E-04	6.40E-05
CT1 Emissions	lb/hr	1.84E-04	1.71E-02	2.74E-57	5.14E-03	1.37E-02	3.04E-01	5.56E-04	9.42E-04	1.24E-02	5.56E-02	2.74E-02
	T/yr	8.1E-04	7.5E-02	1.2E-56	2.2E-02	6.0E-02	1.3E+00	2.4E-03	4.1E-03	5.4E-02	2.4E-01	1.2E-01

<sup>1</sup> AP-42 Table 3.1-3**H1**

Heat Input Rate 2.2 MMBtu/hr  
Annual Operating Hours 8760

		1,3-Butadiene	Acetaldehyde	Acrolein	Benzene	EthylBenzene	Formaldehyde	Naphthalene	PAH	Propylene Oxide	Toluene	Xylenes
Emission Factors <sup>1</sup>	lb/MMBtu				2.10E-03		7.50E-02	6.10E-04			3.40E-03	
CT1 Emissions	lb/hr				4.62E-03		1.65E-01	1.34E-03			7.48E-03	
	T/yr				2.02E-02		7.23E-01	5.88E-03			3.28E-02	

<sup>1</sup> AP-42 Table 1.4-3**H2**

Heat Input Rate 3.8 MMBtu/hr  
Annual Operating Hours 8760

		1,3-Butadiene	Acetaldehyde	Acrolein	Benzene	EthylBenzene	Formaldehyde	Naphthalene	PAH	Propylene Oxide	Toluene	Xylenes
Emission Factors <sup>1</sup>	lb/MMBtu				2.10E-03		7.50E-02	6.10E-04			3.40E-03	
CT1 Emissions	lb/hr				7.98E-03		2.85E-01	2.32E-03			1.29E-02	
	T/yr				3.50E-02		1.25E+00	1.02E-02			5.66E-02	

<sup>1</sup> AP-42 Table 1.4-3**EDG**

Heat Input Rate 3.4 MMBtu/hr  
Annual Operating Hours 500

		1,3-Butadiene	Acetaldehyde	Acrolein	Benzene	EthylBenzene	Formaldehyde	Naphthalene	PAH	Propylene Oxide	Toluene	Xylenes
Emission Factors <sup>1</sup>	lb/MMBtu		2.52E-05	7.88E-06	7.76E-04		7.89E-05	1.30E-04	8.20E-05		2.81E-04	1.93E-04
CT1 Emissions	lb/hr		8.57E-05	2.68E-05	2.64E-03		2.68E-04	4.42E-04	2.79E-04		9.55E-04	6.56E-04
	T/yr		2.14E-05	6.70E-06	6.60E-04		6.71E-05	1.11E-04	6.97E-05		2.39E-04	1.64E-04

<sup>1</sup> AP-42 Table 3.4-3**FP1**

Heat Input Rate 1.1 MMBtu/hr  
Annual Operating Hours 50

		1,3-Butadiene	Acetaldehyde	Acrolein	Benzene	EthylBenzene	Formaldehyde	Naphthalene	PAH	Propylene Oxide	Toluene	Xylenes
Emission Factors <sup>1</sup>	lb/MMBtu		2.52E-05	7.88E-06	7.76E-04		7.89E-05	1.30E-04			2.81E-04	1.93E-04
CT1 Emissions	lb/hr		2.77E-05	8.67E-06	8.54E-04		8.68E-05	1.43E-04	0.00E+00		3.09E-04	2.12E-04
	T/yr		6.93E-07	2.17E-07	2.13E-05		2.17E-06	3.58E-06	0.00E+00		7.73E-06	5.31E-06

<sup>1</sup> AP-42 Table 3.4-3

## **Appendix B - Facility Comments on Draft Permit**

**The following comments were received from the facility on October 25, 2019:**

**Facility Comment:** Permit Condition 4.14 in the draft permit appears to add the requirement to conduct a NO<sub>x</sub> performance test on annual basis. Permit Condition 4.25 in the current permit doesn't explicitly list an annual requirement although both reference 60.4400. Does election of 60.4340(b)(1) replace the annual requirement for a NO<sub>x</sub> performance test listed in 60.4400? I have assumed the NO<sub>x</sub> CEMS demonstrates continuous compliance with the NO<sub>x</sub> standard and an annual performance test of the unit is not required. The wording for 60.4405 "How do I perform the initial performance test if I have chosen to install a NO<sub>x</sub>-diluent CEMS?" seems to suggest that subsequent performance tests are not require with a NO<sub>x</sub> CEMS.

**DEQ Response:** It is correct that using a NO<sub>x</sub> CEMS replaces the requirement to conduct annual performance tests. This requirement was removed from permit condition 4.14.

**Facility Comment:** Table 2.1 lists the emergency fire pump at 231 hp and Section 7 correctly shows 87 hp. Is there any clean up needed in the PTC to correctly list the Emergency Fire Pump at 87 hp? I believe the PTE in the PTC was based on 231 hp, however the pump has always been just 87 hp.

**DEQ Response:** The emergency fire pump in question is incorrectly listed as 231 hp in its underlying PTC and in corresponding PTC application materials; therefore, a PTC revision is needed before the pump horsepower can be corrected in the T1 permit. DEQ recommended this action to IPC on November 1, 2019. On this same day, IPC notified DEQ that the emergency fire pump had been damaged in an electrical fire, and was being sent away for damage assessment/repair. On January 9, 2020, IPC notified DEQ that the emergency fire pump was not repairable and requested that it be removed from its underlying PTC and the T1 permit. Accordingly, on February 11, 2020, IPC submitted an application to revise P-040031 (renamed to P-2020.0004). DEQ processed this application and revised P-2020.0004 to remove the emergency fire pump (Project No. 62384). P-2020.0004 will be issued alongside this T1 permit.

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