



Air Quality Permitting Response to Public Comments

October 19, 2018

Tier I Operating Permit No. T1-2018.0023

Project No. 62021

**Idaho Power Company – Langley Gulch Power Plant
New Plymouth, Idaho**

Facility ID No. 075-00012

Prepared by:
Morrie Lewis, Permit Writer
AIR QUALITY DIVISION

A handwritten signature in black ink, appearing to be "ML", written over the printed name "Morrie Lewis".

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the draft Tier I operating permit to Idaho Power Company – Langley Gulch Power Plant from July 25 through August 24, 2018, in accordance with IDAPA 58.01.01.364. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

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

Comment 1 – Emission Factors:

According to Appendix A in the Statement of Basis, DEQ is relying on emission factors from a host of resources. The listed sources include, but are not limited to, those specified in federal regulations (e.g. – CO₂ and CH₄ for the turbine), EPA Tier 2 standards (e.g. – NO_x and CO for emergency generator 1), AP-42 (e.g. – SO₂ for emergency generator 1), and EPA Tier 4 standards (e.g. – NO_x and CO for emergency generator 2). Given the variety of sources utilized, we want to ensure that the most stringent and protective emission factors were utilized for calculating emissions from this facility.

We request that DEQ explain whether they utilized a particular method or analytical approach in deciding which emission factor to use for emissions calculations in the Statement of Basis, or if DEQ chose emission factor sources arbitrarily. If the former, we request DEQ explain how it chose each of the emissions factors that were used for calculations in the Statement of Basis. For example, if the AP-42 and EPA Tier 2 Standards both provide different emission factors for carbon dioxide emitted from natural gas combustion, DEQ should explain why it chose one emission factor over another.

Response 1: Although development and accuracy of emission estimates is ultimately the responsibility of the permit applicant, DEQ has evaluated and accepted the emissions data sources and calculations relied upon by Idaho Power Company. DEQ believes that emissions in the application meet acceptability criteria, reflect maximum annual emission rates, and have been sufficiently documented to make all necessary regulatory determinations in accordance with IDAPA 58.01.01.314.

An inventory of potential emissions and hazardous air pollutants is required of applicants for Tier I applications, using the best available emissions data and meeting DEQ's data acceptability criteria. Guidance addressing data acceptability

and additional requirements concerning submittal of emission inventories can be found on DEQ's website: www.deq.idaho.gov/permitting/air-quality-permitting/emission-inventories.¹ Calculation of potential emissions ("potential to emit", or "PTE") using acceptable data is considered by DEQ to be both stringent and environmentally protective by design, since PTE is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design, which typically overstates actual emission levels. The emission factors in the application and referenced in the question have been evaluated and found acceptable by DEQ. Compliance with permitted emission limits that were used as the basis for estimating NO_x, CO, VOC, PM₁₀, SO₂, and NH₃ emissions from the combustion turbine stack was also recently demonstrated by Idaho Power Company via emission testing.²

Comment 2 – NESHAP Applicability:

Permit condition 3.27 is titled "NSPS/NESHAP General Provisions" and states: "This facility is subject to NSPS Subparts KKKK and IIII, and is therefore required to comply with applicable General Provisions." Based on the title of this permit condition, it appears that the NESHAP General Provisions are also applicable, despite not being explicitly explained in this permit condition. We ask that DEQ clarify this point, and if needed, revise section 7.5 of the Statement of Basis to read that this facility is subject to NESHAP regulations found at 40 CFR 61.

Response 2: The title for Permit Condition 3.27 in Section 6.1 of the Statement of Basis has been corrected to clarify that the general provisions incorporated in the permit that were applicable to Idaho Power Company – Langley Gulch Power Plant were from New Source Performance Standards (NSPS), and not from National Emission Standards for Hazardous Air Pollutants (NESHAP).

The requirements of 40 CFR 61 are not applicable to Idaho Power Company – Langley Gulch Power Plant, because the facility is not a major source of HAP emissions. Although the stationary reciprocating internal combustion engines (emergency generator engine, emergency pump house engine, and fire pump engine) are area sources subject to 40 CFR 63, Subpart ZZZZ because they commenced construction on or after June 12, 2006, because these sources are subject to regulation under 40 CFR 60, Subpart IIII, no further requirements are applicable under 40 CFR 63, Subpart ZZZZ.

Comment 3 – Fuel-Burning Equipment PM Standards:

Permit condition 3.11 in the Draft Permit limits the discharge of PM using correction values based on oxygen percentage and either the volume for gas or the volume of liquid being combusted. In the Statement of Basis, the discussion of this permit condition also includes discussion of corrections for burning coal or wood products. We're highlighting this discrepancy to ensure that permit condition 3.11 in the final permit only allows the burning of natural gas for the turbine or liquid

¹ "Emissions Data Hierarchy," DEQ, October 2009.

² "Source Emissions Testing Report," Idaho Power Company, August 6 and 7, 2017. (2017AAI2312)

fuel for the ancillary equipment, and in no way implies that the burning of coal would be feasible or acceptable at this facility.

Response 3: The citation for Permit Condition 3.11 in Section 6.1 of the Statement of Basis has been updated to match the language incorporated in the permit.

Although the PM standard for fuel-burning equipment (IDAPA 58.01.01.676-677) also includes concentration limits for solid fuels, these limits were not applicable to Idaho Power Company – Langley Gulch Power Plant and were not incorporated into the permit because the emission units at the facility are only permitted to combust gaseous or liquid fuels, as the commenter has noted.

Comment 4 – Error in Table 5.4 of Statement of Basis:

Individual and total HAP emissions are summarized at the bottom of table 5.4 in the Statement of Basis. It appears that DEQ has these values switched, with the individual HAP reading 10.4 T/yr and the total HAP value reading 6.0 T/yr. We assume this is a typo; however, for the record if these values are correct then this facility must be designated as a major source of HAPs given the exceedance of 10 T/yr for an individual HAP.

Response 4: The error has been corrected as noted in Table 5.4 of the Statement of Basis.

The maximum emission rate of a single hazardous air pollutant (HAP) is 6.0 tons per year (T/yr), and the facility-wide emission rate of all HAP combined is 10.4 T/yr.

Appendix
Public Comments Submitted for
Tier I Operating Permit No. T1-2018.0023 Project 62021



IDAHO
CONSERVATION
LEAGUE

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8/20/18

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Submitted via email: tanya.chin@deq.idaho.gov and morrie.lewis@deq.idaho.gov

RE: Draft Tier I Air Quality Permit Renewal for Idaho Power Company – Langley Gulch Power Plant, Permit No. T1-2018.0023

Dear Ms. Chin and Mr. Lewis:

Thank you for the opportunity to comment on the draft Tier I air quality permit renewal for Idaho Power Company's (IPCo) Langley Gulch Power Plant (Langley Gulch) in New Plymouth, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality and public health.

Our detailed comments are provided following this letter. Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

Austin Hopkins
Conservation Associate

Emission Factors

According to Appendix A in the Statement of Basis, DEQ is relying on emission factors from a host of resources. The listed sources include, but are not limited to, those specified in federal regulations (e.g. – CO₂ and CH₄ for the turbine), EPA Tier 2 standards (e.g. – NO_x and CO for emergency generator 1), AP-42 (e.g. – SO₂ for emergency generator 1), and EPA Tier 4 standards (e.g. – NO_x and CO for emergency generator 2). Given the variety of sources utilized, we want to ensure that the most stringent and protective emission factors were utilized for calculating emissions from this facility.

We request that DEQ explain whether they utilized a particular method or analytical approach in deciding which emission factor to use for emissions calculations in the Statement of Basis, or if DEQ chose emission factor sources arbitrarily. If the former, we request DEQ explain how it chose each of the emissions factors that were used for calculations in the Statement of Basis. For example, if the AP-42 and EPA Tier 2 Standards both provide different emission factors for carbon dioxide emitted from natural gas combustion, DEQ should explain why it chose one emission factor over another.

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Fuel-Burning Equipment PM Standards

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Error in Table 5.4 of Statement of Basis

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