



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Governor Brad Little  
Director John H. Tippetts

January 3, 2020

Derek Forsberg  
Environmental Specialist  
Northwest Pipeline LLC – Lava Hot Springs  
295 Chipeta Way  
Salt Lake City, UT 84108

RE: Facility ID No. 005-00028, Northwest Pipeline LLC – Lava Hot Springs, Topaz  
Final Permit Letter

Dear Mr. Forsberg:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0163 Project 62296 to Northwest Pipeline LLC – Lava Hot Springs located at Topaz for the removal of Solar Saturn 10-1300 portable turbine. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received September 4, 2019.

This permit is effective immediately and replaces PTC No. P-2008.0163, issued on February 6, 2009. This permit does not release Northwest Pipeline LLC – Lava Hot Springs from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Pocatello Regional Office, 444 Hospital Way #300, Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Melissa Gibbs, Regional Air Quality Manager, at (208) 236-6160 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MSvzp  
Permit No. P-2008.0163 PROJ 62296  
Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Northwest Pipeline LLC – Lava Hot Springs  
**Permit Number** P-2008.0163  
**Project ID** 62296  
**Facility ID** 005-00028  
**Facility Location** 6680 E. Old Oregon Trail Rd  
Topaz, ID 83246

### Permit Authority

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

**Date Issued** January 3, 2020



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**Zach Pierce, Permit Writer**



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**Mike Simon, Stationary Source Manager**

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# 1 Permit Scope

## Purpose

- 1.1 This is a modified permit to construct (PTC) to remove Solar Turbine Saturn 10-1300 from the permit.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2008.0163, issued on February 6, 2009.

## Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Section	Source	Control Equipment
2	<u>Emissions Unit Name:</u> Manufacturer: Solar Turbines, Inc Model: 40-4002 Manufacture Date: 1978 Modification Date: 2003 Maximum Rating: 4,107 HP @ ISO Fuel: Natural Gas only	N/A
	<u>Emissions Unit Name:</u> Manufacturer: Solar Turbines, Inc Model: 40-4700S Manufacture Date: 2003 Modification Date: N/A Maximum Rating: 4,700 HP @ ISO Fuel: Natural Gas only	SoLo NO <sub>x</sub> Combustor

[1/3/2020]

## 2 Two Natural Gas-Fired Turbines

### 2.1 Process Description

The two natural gas-fired turbines are used to power natural gas compressors on a Federal Energy Regulatory Commission (FERC) regulated natural gas pipeline.

[1/3/2020]

### 2.2 Control Device Descriptions

Table 2.1 describes the devices used to control emissions from the two natural gas-fired turbines

**Table 2.1 Two Natural Gas-Fired Turbines Description**

Emissions Units / Processes	Control Devices
Gas Turbine/ T4002	N/A
Gas Turbine/ T4700S	SoLo NO <sub>x</sub> Combustor

[1/3/2020]

## Emission Limits

### 2.3 Emission Limits

The emissions from the T4002 and T4700S gas turbine stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

**Table 2.2 Two Natural Gas-Fired Turbines Emission Limits <sup>(a)</sup>**

Source Description	NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(b)</sup>	T/yr <sup>(c)</sup>	lb/hr <sup>(b)</sup>	T/yr <sup>(c)</sup>	lb/hr <sup>(b)</sup>	T/yr <sup>(c)</sup>
Gas Turbine T4002	21.65	94.85	19.98	87.53	0.46	2.01
Gas Turbine T4700S	3.89	17.02	4.74	20.77	0.27	1.19

- a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- c) Tons per any consecutive 12-calendar month period.

[1/3/2020]

### 2.4 Opacity Limit

Emissions from the gas turbine stacks, or any other stack, vent, or functionally equivalent opening associated with the natural gas-fired turbines, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[4/25/1994]

### 2.5 NSPS NO<sub>x</sub> Emissions Limit

In accordance with 40 CFR 60.332(a)(2) NO<sub>x</sub> emissions from the T4002 gas turbine shall not exceed 0.0167% by volume at 15% oxygen.

[12/12/1994]

### 2.6 NSPS NO<sub>x</sub> Emissions Limit

In accordance with 40 CFR 60.332(a)(2), NO<sub>x</sub> emissions from the T4700S gas turbine shall not exceed 0.0166% by volume at 15% oxygen.

[2/6/2009]

## **Operating Requirements**

### **2.7 Allowable Fuel Types**

The two gas-fired turbines shall only combust natural gas fuel.

[1/3/2020]

### **2.8 Natural Gas Sulfur Content Limit**

In accordance with 40 CFR 60.333(b), the sulfur content of the natural gas combusted in the two gas turbines shall not exceed 0.8% by weight (8000 ppmw).

[1/3/2020]

## **Monitoring and Recordkeeping Requirements**

### **2.9 Fuel Use Monitoring**

The permittee shall monitor and record the fuel usage for the two gas turbines continuously using fuel flow meters that are accurate to within  $\pm 5.0\%$ . The fuel flow meters shall be calibrated once each year. The date and time of each calibration and any maintenance performed on the fuel meters shall also be recorded. Each calendar month, the permittee shall record total monthly fuel usage and maximum hourly fuel usage for the turbines.

[1/3/2020]

### **2.10 Emissions Calculations**

Each month the permittee shall calculate the maximum hourly emissions and the monthly emissions of  $\text{NO}_x$  and CO in tons per month for the two gas turbines. The permittee shall use the data from the most recent source test, where available, or the emission factors used in the permit application. Each month the permittee shall calculate the annual emissions for the previous 12-consecutive-month period. Records of these calculations shall be kept for a period of at least two years and shall be made available to Department representatives upon request.

[1/3/2020]

### **2.11 Fuel Sulfur and Nitrogen Content**

As long as the two gas turbines are burning pipeline-quality natural gas, the permittee shall maintain records of the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less.

[1/3/2020]

### **2.12 Recordkeeping**

The permittee shall comply with the recordkeeping requirements of the Monitoring and Recordkeeping General Provision.

[2/6/2009]

## **Performance Testing Requirements**

### **2.13 NSPS Performance Test(s)**

Within 60 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after initial startup of each new or modified turbine, the permittee shall conduct performance tests to measure  $\text{NO}_x$  emissions from the gas turbine stack(s). This initial performance test, and any subsequent performance tests conducted to demonstrate

compliance, shall be performed in accordance with 40 CFR 60.335 as allowed in IDAPA 58.01.01.157.

[6/28/2002]

## **Reporting Requirements**

### **2.14 Performance Test Protocol**

The permittee shall submit a test protocol to the Department for approval at least 30 days prior to the performance tests required in Permit Condition 2.13.

[1/3/2020]

### **2.15 Performance Test Report**

The permittee shall submit a report of the results of the performance tests required in Permit Condition 2.13, including all required process data, to the Department within 30 days after the date on which the stack sampling is concluded.

[1/3/2020]

### **2.16 Certification of Documents**

In accordance with IDAPA 58.01.01.123, all documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[8/23/2001]

### **2.17 40 CFR 60, Subpart A – General Provisions**

The permittee shall comply with the following applicable requirements of 40 CFR 60, Subpart A – General Provisions in Table 2.3.

**Table 2.3 SUBPART A – GENERAL PROVISIONS**

Section	Section Title	Summary of Section Requirements
60.4	Address	All notifications and reports shall be submitted to:  Department of Environmental Quality Pocatello Regional Office 444 Hospital Way #300 Pocatello, ID 83201
60.7(a),(b), and (f)	Notification and Record Keeping	<ul style="list-style-type: none"> <li>• Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date.</li> <li>• Notification shall be furnished of initial startup postmarked within 15 days of such date.</li> <li>• Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made.</li> <li>• Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative.</li> <li>• Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.</li> </ul>
60.8	Performance Tests	<ul style="list-style-type: none"> <li>• At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present.</li> <li>• Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished.</li> <li>• Performance testing facilities shall be provided as follows:                             <ul style="list-style-type: none"> <li>• Sampling ports adequate for test methods applicable to such facility.</li> <li>• Safe sampling platform(s).</li> <li>• Safe access to sampling platform(s).</li> <li>• Utilities for sampling and testing equipment.</li> </ul> </li> <li>• Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f).</li> </ul>
60.11(a),(d),(f), and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> <li>• When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8.</li> <li>• At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.</li> <li>• For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.</li> </ul>



60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	<ul style="list-style-type: none"> <li>• Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test.</li> <li>• The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided.</li> <li>• Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).</li> </ul>
60.12	Circumvention	<ul style="list-style-type: none"> <li>• No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.</li> </ul>
60.14	Modification	<ul style="list-style-type: none"> <li>• A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14.</li> <li>• Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.</li> </ul>
60.15	Reconstruction	<ul style="list-style-type: none"> <li>• An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.</li> </ul>

[1/3/2020]

### 3 General Provisions

#### General Compliance

- 3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).  
[Idaho Code §39-101, et seq.]
- 3.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.  
[IDAPA 58.01.01.211, 5/1/94]
- 3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.  
[IDAPA 58.01.01.212.01, 5/1/94]

#### Inspection and Entry

- 3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
  - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108]

#### Construction and Operation Notification

- 3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.  
[IDAPA 58.01.01.211.02, 5/1/94]
- 3.6 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
  - A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and
  - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.
- [IDAPA 58.01.01.211.01, 5/1/94]

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

[IDAPA 58.01.01.211.03, 5/1/94]

### **Performance Testing**

- 3.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

### **Monitoring and Recordkeeping**

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

[IDAPA 58.01.01.211, 5/1/94]

### **Excess Emissions**

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

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

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

[IDAPA 58.01.01.123, 5/1/94]

## **False Statements**

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

[IDAPA 58.01.01.125, 3/23/98]

## **Tampering**

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

[IDAPA 58.01.01.126, 3/23/98]

## **Transferability**

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

[IDAPA 58.01.01.209.06, 4/11/06]

## **Severability**

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

[IDAPA 58.01.01.211, 5/1/94]