

**STATEMENT OF BASIS FOR CHAPTER 401 AIR OPERATING PERMIT  
AOP-6 RENEWAL #2  
TRANSCANADA GAS TRANSMISSION NORTHWEST CORPORATION (GTN)**

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## LIST OF ABBREVIATIONS

BACT	Best available control technology
CFR	Code of Federal Regulations
CO	Carbon monoxide
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O2	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority
scf	Standard cubic foot
SO2	Sulfur dioxide
SOx	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

## DEFINITIONS OF WORDS AND PHRASES

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(12), 10/4/93]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 10/4/93]
Emission Limitation	A requirement established under the FCAA or Chapter 70.94 RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70.94 RCW [WAC 173-400-030(22), 9/13/96]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70.94 RCW, or 70.98 RCW [WAC 173-400-030(23), 9/13/96]
Federal Clean Air Act	Federal Clean Air Act. also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(13), 10/4/93]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [WAC 173-400-030(51), 9/13/96]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

**STATEMENT OF BASIS FOR TRANSCANADA GAS TRANSMISSION  
NORTHWEST CORPORATION (GTN)  
CHAPTER 401 AIR OPERATING PERMIT  
AOP-6 – RENEWAL #2**

Transcanada Gas Transmission Northwest Corporation (GTN) is a natural gas transmission company operating a 612.5 mile long pipeline from the Canadian border through the states of Idaho, Washington, and Oregon to California. Energy to move the gas along the pipeline is provided by 12 natural gas fired compressor stations located about every 60 miles along the pipeline, all of which are designed for remote, unattended operation from GTN's Gas Control Center in Portland. One of the stations, Station 6 or the Rosalia station, is in Spokane County at 315 East Babb Road, near the southern edge of the county. This station has three natural gas fired turbines, Unit 6A, 6B, and 6C, used to drive the compressor units.

The facility is classified as a major source, as defined in Chapter 173-401 WAC, due to oxides of nitrogen (NOx) and carbon monoxide (CO) emissions given off by the turbines. As a major source, GTN is required to apply for an operating permit under SRCAA's Title V air operating permit program as established in Chapter 173-401 WAC. WAC 173-401-700(8) requires that a statement be provided at the time a draft permit is issued under the Title V program, setting forth the legal and factual basis for permit conditions including reference to the applicable statutory or regulatory provisions for the conditions. This document provides the basis for the draft permit for GTN.

The permit is organized into sections. The first section contains standard terms and conditions. This section is basically the same for all permits issued by SRCAA. The second section contains applicable requirements that apply to the facility, along with monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with each applicable requirement. This section is divided into subsections to address different emission units or classes of emission units. The third and final section addresses requirements that have been deemed inapplicable to the source or to emission units located at the source, i.e., the permit shield per WAC 173-401-640(2).

After a brief summary of operations at the facility, the format of this Statement of Basis will follow that of the permit with the standard terms and conditions discussed first, followed by the applicable requirements, and finally the permit shield.

**FACILITY SUMMARY**

GTN's facility includes three natural gas fired turbines; Unit 6A, a Solar unit rated at 14,600 HP (ISO); Unit 6B, an Ingersoll Rand/GE LM1500 unit rated at 14,210 HP (ISO); and Unit 6C, a Solar Titan unit, rated at 19,500 hp (ISO). The function of the natural gas turbines is to produce gas horsepower in order to induce flow of the gas in the pipeline. The horsepower requirement at the station varies depending on customer demand, weather conditions, availability of compressor units at other stations on the pipeline, downstream pressure requirements, and receiving pressures and volumes. Consequently, normal operation includes operation of any of the three turbines individually, or combinations of turbines together. When running, turbines are normally operated between 40% and 100% of maximum horsepower output. Other emission units at the site include a 1,462 hp Caterpillar Model G3516 natural gas fired emergency generator, several boilers, and fuel storage tanks. The boilers and fuel storage tanks are generally considered insignificant for purposes of SRCAA's Title V program.

Emissions from the facility are due primarily to combustion and include: NOx, CO, particulate,

sulfur dioxide, volatile organic compounds, and to a lesser extent some hazardous air pollutants.

#### **PERMITTING HISTORY**

SRCAA has issued the following Notice of Construction (NOC) approval orders and regulatory orders to GTN:

- PSD #90-02 issued 7/18/90 for Unit 6A;
- NOC #272 issued 5/9/90, modified 3/16/92, for temporary unit operated until SoLoNOx unit installed on Unit 6A; NOC no longer needed;
- NOC #404 issued 9/16/92, modified 7/22/97 for Unit 6A;
- NOC #1103 issued 4/4/02 and revised on 9/11/02 and 8/31/07 for Unit 6C and gas fired emergency generator;
- PSD #01-05 issued 4/29/02 for Unit 6C and gas fired emergency generator;

SRCAA has issued the following Air Operating Permits (AOP) to GTN:

- AOP #6 issued 1/22/98; and
- AOP #6 Renewal #1 issued 5/2/03.

#### **COMPLIANCE HISTORY**

SRCAA has performed a compliance inspection at GTN either annually or biannually since 1996. During the past ten years, SRCAA has issued two Notices of Violation.

On March 16, 2006, SRCAA issued a Notice of Violation to GTN for failure to conduct a Cylinder Gas Audit on the NOx Continuous Emission Monitor (CEM) associated with Unit 6C during 3rd Qtr 2005. The violation was a one-time occurrence. The requirement to operate the NOx CEMs is no longer applicable because GTN received approval from the Washington Department of Ecology and SRCAA to remove the NOx CEMs (after three years of operation) and follow an alternate NOx Monitoring Plan.

On July 12, 2006, SRCAA issued a Notice of Violation to GTN for exceeding the carbon monoxide (CO) emission limit contained in Condition 92 for Unit 6C during emission testing on Unit 6C performed at Station 6 on June 22, 2006. The exceedance was determined to be caused by mechanical failure (cracked fuel injector), which has been repaired. The violation has been corrected.

#### **EMISSION UNITS**

Emission units at GTN can be divided into four main sections: Unit 6A, Unit 6B, Unit 6C, and the natural gas fired emergency generator. A discussion on each of these sections follows. After these sections, the insignificant emission units at GTN are discussed and listed.

**Unit 6A**

Unit 6A is a Solar unit rated at 14,600 HP (ISO). Unit 6A has been in operation since 1990. The NOC and PSD approvals for this unit allowed a unit capable of meeting the NSPS emission standards to be installed temporarily, followed by installation of a unit capable of meeting lower NOx emissions. The low NOx unit has been in place since about 1992.

Pertinent information on Unit 6A is given in Table 1 below.

**Table 1 – Unit 6A Emission Units**

Process #, Emission Point	Description	Air Pollution Control Equipment
Process 2, #1	Unit 6A - Solar natural gas fired turbine rated at 14,600 hp (ISO) (NOC #404; PSD #90-02)	Lo-NOx combustion

**Unit 6B**

Unit 6B is an Ingersoll Rand/GE LM 1500 natural gas fired turbine rated at 14,210 hp (ISO) that has been in operation since 1969. Unit 6B pre-dates the NSPS emission standard (40 CFR 60, Subpart GG), "Standards of Performance for Stationary Gas Turbines." Unit 6B also pre-dates SRCAA's Notice of Construction (NOC) program and the federal Prevention of Significant Deterioration (PSD) program, so no new source review approvals have been required for Unit 6B. However, NOC #404 (approval for Unit 6A) contains some requirements for like-kind engine exchanges performed on Unit 6B.

Pertinent information on Unit 6B is given in Table 2 below.

**Table 2 – Unit 6B Emission Units**

Process #, Emission Point	Description	Air Pollution Control Equipment
Process 3, #1	Unit 6B - Ingersoll Rand/GE LM 1500 natural gas fired turbine rated at 14,210 hp (ISO)	None

**Unit 6C**

Unit 6C is a Solar Titan unit, equipped with low NOx technology and rated at 19,500 hp (ISO), was installed in 2002. The unit is subject to the NSPS emission standards given in 40 CFR 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines."

Significant Unit 6C emission units are listed in Table 3 below. If a unit was subject to new source review requirements, the NOC and/or PSD approval numbers are given in parentheses after the unit description.

**Table 3 – Unit 6C Emission Units**

Process #, Emission Point	Description	Air Pollution Control Equipment
Process 4, #1	Unit 6C – Solar Titan natural gas fired turbine rated at 19,500 hp (ISO) (NOC #1103; PSD-01-05)	Lo-NOx combustion

**Emergency Generator**

A 1,462 hp Caterpillar Model G3516 natural gas fired emergency generator was installed at Station 6 in 2002. Significant emission units are listed in Table 4 below. If a unit was subject to new source review requirements, the NOC and/or PSD approval numbers are given in parentheses after the unit description.

**Table 4 – Emergency Generator Emission Units**

Process #, Emission Point	Description	Air Pollution Control Equipment
Process 1, #1	1,462 hp Caterpillar Model G3516 natural gas fired emergency generator (NOC #1103; PSD-01-05)	None

**Insignificant Emission Units**

Insignificant emission units (IEUs) include any activity or emission unit located at a major source which qualifies as insignificant under the criteria listed in WAC 173-401-530. A list of the IEUs, identified in the permit application, is presented below in Table 5. In order to remain an IEU, emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels.

Insignificant emission units are subject to the generally applicable requirements (i.e., facility-wide emission limitations). According to WAC 173-401-530, testing, monitoring, recordkeeping, and reporting are not required for insignificant emission units unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the State Implementation Plan (SIP). SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units presented in Table 5 to assure compliance with the generally applicable requirements. SRCAA's determination was based on the following:

- SRCAA has not documented a violation of any of the generally applicable requirement in the past from the list of IEUs in Table 5 (i.e., the IEUs have had a consistent compliance history); and
- Most of the IEUs emit small quantities of pollutants and/or do not operate continuously.

**Table 5 – Insignificant Emission Units**

Emission Unit Description	ID Number Used in Permit Application	Basis / Justification for IEU Designation
Boiler #1, Cleaver Brooks Model P723-25, rated at 1.046 MMBTU/hr, natural gas fired	Process 1, #2	WAC 173-401-533(2)(e) (combustion source less than 5 MMBTU/hr exclusively using natural gas, butane, propane, and/or LPG)
Boiler #2, National Model 6-66A, rated at 1.25 MMBTU/hr, natural gas fired	Process 1, #3	WAC 173-401-533 (combustion source less than 5 MMBTU/hr exclusively using natural gas, butane, propane, and/or LPG)
Boiler #3, Day & Night Model 50-JSF-6, rated at 130,000 BTU/hr, natural gas fired	Process 1, #4	WAC 173-401-533 (combustion source less than 5 MMBTU/hr exclusively using natural gas, butane, propane, and/or LPG)
Fugitive Dust	Process 1, #5	WAC 173-401-530(1)(d)
Gasoline Storage Tank, 500 Gallon Capacity	Process 1, #8	WAC 173-401-533(2)(c)
Diesel Storage Tank, 500 Gallon Capacity	Process 1, #9	WAC 173-401-533(2)(c)

**STANDARD TERMS AND CONDITIONS**

This section of GTN's permit contains standard terms and conditions that apply to all sources in SRCAA's Title V program. These conditions have been reviewed by EPA and include all terms required in Chapter 173-401 WAC as well as requirements from other air quality laws and regulations. The standard terms have been organized in seven subsections including:

- PERMIT ADMINISTRATION;
- INSPECTION & ENTRY;
- EMERGENCY PROVISIONS;
- GENERAL MONITORING, RECORDKEEPING, & REPORTING;
- COMPLIANCE CERTIFICATION;
- TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS AND TREATMENT

OF DOCUMENTS; and  
APPLICABLE WHEN TRIGGERED REQUIREMENTS.

A discussion of each subsection follows. The requirements in each section are briefly discussed, along with the citations for each requirement. Using the same methodology as the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation. Although, in and of itself, Chapter 173-401 WAC is not federally enforceable, the requirements of this regulation are based on federal requirements for the operating permit program. Upon issuance of the permit, the terms based on Chapter 173-401 WAC will become federally enforceable for the source.

**NOTE:** The adoption date for each requirement is also given. The adoption date may be important if an earlier version of the requirement is in the State Implementation Plan (SIP). In many instances, a revision may have occurred within a section that does not affect the requirement being cited. If this is the case, the most recent adoption date is given, along with the SIP version date in parentheses, and the requirement is federally enforceable. If a change was made in the requirement, both the earlier, SIP approved, requirement and the most recent requirement would go in the permit. The version in the SIP would be federally enforceable, and the more recent version would be enforceable at the state or local level.

If a new rule or a newer version of a rule has been submitted to EPA for inclusion in the SIP and EPA has proposed action, but not taken final action, the permit will be drafted so that when EPA action does occur, the requirement will become federally enforceable.

#### **Permit Administration**

Below are standard terms included in the subsection, Permit Administration. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirement.

1. Federal Enforceability - All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. [WAC 173-401-625, 10/4/93]
2. Duty to Comply - The permittee must comply with the terms and conditions of the permit. [WAC 173-401-620(2)(a), 10/4/93]
3. Schedule of Compliance. The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis. [WAC 173-401-630(3), 10/4/93]
4. 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. [WAC 173-401-620(2)(b), 10/4/93]

5. Permit Actions - This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If GTN 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. [WAC 173-401-620(2)(c), 10/4/93]
6. Reopening for Cause - This term lists 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. [WAC 173-401-730, 10/4/93]
7. 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. [WAC 173-401-620(2)(g), 10/4/93]
8. Property Rights. The permit does not convey any property rights of any sort, or any exclusive privilege. [WAC 173-401-620(2)(d), 10/4/93]
9. Duty to Provide Information. The permittee must furnish, within a reasonable time to SRCAA, any information, including records required in 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. [WAC 173-401-620(2)(e), 10/4/93]
10. Duty to Supplement or Correct Application. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, must promptly submit such supplementary facts or corrected information. 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. [WAC 173-401-500(6), 9/16/02]
11. Permit Fees. The permittee must pay fees as a condition of this permit in accordance with SRCAA's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in Chapter 70.94 RCW. [WAC 173-401-620(2)(f), 10/4/93]
12. Severability. If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable. [WAC 173-401-620(2)(h), 10/4/93]
13. Permit Appeals. The permit or any conditions in it may be appealed only by filing an appeal with the pollution control hearings board and serving it on SRCAA within thirty days of receipt pursuant to RCW 43.21B.310. This provision for appeal is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA,

including petitions filed pursuant to 40 CFR 70.8(c) and 70.8(d). [WAC 173-401-620(2)(i), 10/4/93] [WAC 173-401-735(1), 4/2/97]

14. Permit Renewal and Expiration. The permit is in effect for five years. The permittee's right to operate this source terminates with the expiration of the permit unless a timely and complete application for renewal is submitted. Chapter 173-401-710(1) allows SRCAA to set, in the permit, the due date for the renewal as long as it is no more than 18 months and no less than six months prior to expiration of the permit. SRCAA specifies in the permit that the renewal must be submitted no more than 18 months and no less than 12 months prior to the permit expiration. The facility may continue to operate subject to final action by SRCAA on the application, as long as a timely and complete application has been filed and all requested additional information necessary to process the permit is submitted by the deadline specified in writing by SRCAA. [WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1) & (3), 9/16/02]

15. Permit Continuation. The permit will not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j), 10/4/93]

16. Permit Shield. Compliance with a permit condition is deemed compliance with the applicable requirements identified in the permit upon which that condition is based, as of the date of permit issuance except that this shield will not affect the following:

- a. The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The ability of EPA to obtain information from the permittee pursuant to Section 114 of the FCAA;
- d. The ability of SRCAA to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in Chapter 252, Laws of 1993.

[WAC 173-401-640(1) & (4), 10/4/93]

### **Inspection and Entry**

Below are standard terms included in the subsection, Inspection & Entry. This subsection of the permit contains requirements for allowing authorized access to a facility for purposes of assuring/determining compliance with air quality requirements. Generally the language tracks the rule language closely with only minor changes for clarity and conciseness. There is no intent to alter the effect of the requirements.

17. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the permittee must allow SRCAA, or an authorized representative, to enter a Chapter 401 facility or location where records are kept, to have access to and copy, at reasonable times records, to inspect, at reasonable times, any facility or equipment or operations regulated by the permit, and/or to perform sampling or monitoring, at reasonable times, for the purpose of assuring compliance. [WAC 173-401-630(2), 10/4/93] [SRCAA Regulation I, Section 2.02.E &F, 3/4/04 – STATE/LOCAL ONLY] [[NOC #404, Condition #16, 9/16/92 as revised on 7/22/97 and 6/6/00] [PSD #90-02 Amendment 1, Condition 12, 7/18/97]

Nothing in this condition limits the ability of EPA to inspect or enter the premises of the permittee under Section 114 of the FCAA. [WAC 173-401-640(4)(d), 10/4/93]

Failure to allow access to EPA, Ecology, or SRCAA is grounds for revocation of PSD #90-02 Amendment 1 (7/18/97) and an enforcement action. [PSD #90-02 Amendment 1, Condition 12, 7/18/97] [PSD 01-05 Amendment 1, Condition 16, 11/14/02]

18. Obstruction of Access. No person may obstruct, hamper, or interfere with any authorized representative of SRCAA who requests entry for the purpose of inspection, and who presents appropriate credentials; nor may any person obstruct, hamper or interfere with any such inspection. [RCW 70.94.200, 1998 - STATE/LOCAL ONLY] [SRCAA Regulation I, Section 2.02.E, 3/4/04 – STATE/LOCAL ONLY]

### **Emergency Provisions**

Below are standard terms that are included in the subsection, Emergency Provisions. This subsection of the permit contains provisions, governing the treatment of periods of emissions in excess of applicable standards, when such emissions stem from unforeseeable events or arise from start-up, shutdown or maintenance, where design or operational practices could not preclude such emissions. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

19. Emergencies. This term incorporates the emergency provisions established in Chapter 173-401 WAC which allow for a positive defense to noncompliance with technology-based emission limitations if certain conditions are met. The time limits for reporting such emission events are included to assure that the permittee is aware of the timeframes. The time limits come from WAC 173-401-645 and WAC 173-401-615(3)(b). [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

20. Excess Emissions. This term incorporates the excess emissions provisions of Chapter 173-400 WAC which require that the excess emissions be excused and not be subject to penalty if certain criteria are met. As with the emergency provision above, the time limits for reporting excess emissions are included in this term. [WAC 173-400-107,

8/20/93] [WAC 173-401-615(3)(b), 9/16/02]

(See Condition 3M addressing excess emission reporting requirements relating to sulfur content of fuel used in Unit 6A and 6C)

21. Report of Breakdown. This term establishes the conditions under which violations of SRCAA Regulation I may be excused. It should be noted that this provision cannot be invoked for any federally enforceable requirement, as Section 6.08 is not in the State Implementation Plan. The only federally enforceable requirements in SRCAA Regulation I, i.e., currently the only requirements to which Section 6.08 cannot apply, are Regulation I, Sections 6.05, 6.14, 6.15, and Article VIII [SRCAA Regulation I, Section 6.08, 3/4/04 - STATE/LOCAL ONLY]

#### **General Monitoring, Recordkeeping, & Reporting**

Below are standard terms included in the subsection, General Monitoring, Recordkeeping, & Reporting. This subsection contains general requirements for monitoring, recordkeeping, and reporting. Monitoring, recordkeeping, & reporting requirements (MRRR) that apply to specific emission standards or specific emission activities are located in the second section of the permit. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the Monitoring Report term, an attempt was made to clarify SRCAA's expectation of how the requirements will be met. The discussions below provide more detail on these efforts and the regulatory authority relied upon to establish the terms.

22. Records of Required Monitoring Information. This term details what records must be kept relating to monitoring. [WAC 173-401-615(2)(a), 9/16/02]

23. Permanent Shutdown of an Emission Unit - If an emission unit is permanently shut down, rendering existing permit terms and conditions irrelevant, the permittee will not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emissions unit, once any residual requirements, such as the semi-annual report and annual compliance certification covering the last period during which the unit last operated, have been met. All records, relating to the shut down emissions unit, generated while the emissions unit was in operation, must be kept in accordance with Conditions 22 - Records of Required Monitoring Information and 26 – Retention of Records

Contemporaneous with the shutdown of the emission unit, the permittee must record the date that operation of the emissions unit ceased, using a log or file on site. The shutdown date must be reported to SRCAA on the monitoring report, required under Condition 27 - Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

24. Operational Flexibility. In the event that an emissions unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is

required. Recordkeeping and reporting must note the reason why, and lengths of time that, the emissions unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

25. Records of Changes. The permittee must keep records of changes made at the source that result in emissions of a regulated air pollutant, subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from such a change. [WAC 173-401-615(2)(b), 9/16/02]

26. Retention of Records. The permittee must keep monitoring data and support information for a period of five years. [WAC 173-401-615(2)(c), 9/16/02] [NOC #404, Condition 18, 9/16/92 as revised on 7/22/97 and 6/6/00]

27. Monitoring Reports. The permittee must submit monitoring reports to SRCAA as follows:

- Monitoring report covering the period from January 1 – June 30 each year shall be submitted to SRCAA and postmarked no later than July 30 of the same calendar year; and
- Monitoring report covering the period from July 1 – December 31 each year shall be submitted to SRCAA and postmarked no later than April 15 of the following calendar year.

All instances of permit deviations must be identified in the monitoring reports. In addition, any permanent emission unit shutdowns must be reported in accordance with Condition 23-Permanent Shutdown of an Emission Unit, above. The monitoring reports must be certified by a responsible official. SRCAA has added language to this condition that if monitoring reports are required, by an underlying requirement, to be submitted more frequently than every six months, the responsible official certification is only required for the semiannual reports but that the certification must cover all reports submitted since the last certification. The addition of this last requirement meets the intent of the law in that all reports are certified, while minimizing the burden on a source to go to the responsible official every time a report is submitted. Allowing a source this flexibility could become more important in the future, e.g., if SRCAA were to require a source to submit monitoring data electronically or by some other real time mechanism where responsible official certification would be difficult, if not impossible. [WAC 173-401-615(3)(a), 9/16/02]

28. Prompt Reporting of Deviations. The permittee must promptly report deviations from permit requirements, the probable cause of such deviations, and any corrective measures taken. (Prompt is defined in this permit term and is consistent with the reporting time limits of terms in the Emergency Provisions section.) [WAC 173-401-615(3)(b), 9/16/02]

29. Emission Inventory. The permittee must submit an inventory of emissions from the

source each year and must maintain records sufficient to document reported emissions. The PSD and NOC also require that the annual report include other information including fuel usage, hours of operation, and monitoring information.

[WAC 173-400-105(1), 1/10/05(8/20/93)] [PSD #90-02 Amendment 1, Condition 6, 7/18/97] [NOC #404, Condition 17, 9/16/92 as revised on 7/22/97 and 6/6/00] [NOC #1103, Condition 6, 4/4/02 as revised on 9/11/02 and 8/31/07]

30. WAC 173-401-530(1)(a) Insignificant Emission Units. Emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels. Upon request from SRCAA, the permittee must demonstrate that the actual emissions from such a unit or activity are below the applicable emission thresholds. [WAC 173-401-530(6), 9/16/02]

31. Report Submittals. This term provides the address to which reports must be sent and requires all reports to be certified by a responsible official. [WAC 173-401-520, 10/4/93]

32. Rendering Device or Method Inaccurate. GTN may not render inaccurate any monitoring device or method required under Chapter 70.94 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(8), 1/10/05(8/20/93)]

### **Compliance Certification**

As part of SRCAA's Title V program, sources are required to submit annual compliance certifications. (SRCAA may require more frequent certifications if the source is out of compliance or if an underlying requirement specifies more frequent submittals.) This subsection of the permit addresses the details of these compliance certification submittals, including how often submittals must occur, what the submittals must contain and to whom the certifications must be sent. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

33. Compliance Certification Submittals. This term covers the frequency for submitting compliance certifications. [WAC 173-401-630(5)(a), 10/4/93]

34. Compliance Certification Contents. This term describes what must be included in each compliance certification. [WAC 173-401-630(5)(c), 10/4/93]

35. Submittal to EPA. This term requires that certifications be sent to EPA as well as SRCAA. [WAC 173-401-630(5)(d), 10/4/93]

### **Truth and Accuracy of Statements and Documents and Treatment of Documents**

Below are standard terms contained in the subsection, Truth and Accuracy of Statements and

Documents and Treatment of Documents. The terms are based on SRCAA's Regulation I. Generally, the language tracks the rule language closely, with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements.

36. False Information. GTN may not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70.94 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [WAC 173-400-105(7), 1/10/05(8/20/93)]

37. Falsification of Statements. This term prohibits willfully making false statements to SRCAA in any matter within SRCAA's jurisdiction. [SRCAA Regulation I, 2.08.A, 8/3/06 - STATE/LOCAL ONLY]

38. Alteration of Documents. This term prohibits the reproduction or alteration of any document issued by SRCAA, if the purpose of such is to evade or violate any requirement. [SRCAA Regulation I, 2.08.B, 8/3/06 - STATE/LOCAL ONLY]

39. Availability of Documents. Any order required to be obtained by SRCAA Regulation I must be available on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 8/3/06 - STATE/LOCAL ONLY]

40. Posting of Notices. Notices which SRCAA requires to be displayed shall be posted. The permittee may not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA. [SRCAA Regulation I, 2.08.D, 8/3/06 - STATE/LOCAL ONLY]

#### **Applicable When Triggered Requirements**

The subsection, Applicable When Triggered Requirements, contains requirements that do not apply to the facility unless certain activities at the site trigger the requirement. SRCAA has included these requirements in the permit, either because they are often triggered at sources or are important enough that their inclusion in the permit is warranted. Generally the language tracks the rule language closely with only minor changes for clarity or conciseness. There is no intent to alter the effect of the requirements. However, in the term, Source Testing, language has been added to clarify what an approved test method is, as the rule does not elaborate on what "approved" means. The discussion below provides more detail in regards to this.

41. New Source Review. Prior to the establishment of a new source, including modifications, the permittee may be required to file and obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-110, -112, -113, 8/15/01 – STATE/LOCAL ONLY] [WAC 173-400-110, -112, -113, 8/20/93] [Chapter 173-460 WAC, 7/21/98 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 12/7/06 - STATE/LOCAL ONLY]

42. Replacement or Substantial Alteration of Existing Control Equipment. Prior to replacing or substantially altering existing control equipment, the permittee shall file and

obtain approval under SRCAA's Notice of Construction program. [WAC 173-400-114, 8/15/01 - STATE/LOCAL ONLY] [SRCAA Regulation I, Article V, 12/7/06 - STATE/LOCAL ONLY]

43. Demolition and Renovation (Asbestos). The permittee must comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR 61 Subpart M, July 1, 2001] [WAC 173-400-075, 1/10/05] [SRCAA Regulation I, Article IX, 2/5/98 - STATE/LOCAL ONLY]

**Comment [CES1]:** Per Elizabeth Waddell 7/31/02 – Latest Publication

44. Source Testing. To demonstrate compliance Ecology or SRCAA may conduct or require that a test be conducted using approved methods per WAC 173-400-050, -060, & -105(4). Chapter 173-400 WAC does not elaborate on what “approved” means. Language has been added to this condition to clarify what SRCAA considers “approved”. The condition requires that in order for a method to be approved it must be submitted to SRCAA at least 30 days prior to the test date, or a shorter period of time if indicated in writing by SRCAA, and SRCAA must approve the method in writing. Changes must also be approved by SRCAA in writing. [WAC 173-400-105(4), (1/10/05 (8/20/93))] [WAC 173-401-615(1), 9/16/02]

45. Chemical Accident Prevention Provisions. A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.130, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68. [40 CFR Part 68, July 1, 2001]

**Comment [CES2]:** Per Elizabeth Waddell 7/31/02 – Latest Publication

#### **EMISSION LIMITATIONS & MONITORING, RECORDKEEPING & REPORTING**

This section contains emission limitations and emission related requirements, including general requirements for the facility. The section is divided into several subsections. The first subsection lists limitations that apply facility-wide. Subsequent subsections focus on individual emission units or classes of similar emission units. As in all other sections of the permit, requirements that are not required under the FCAA are indicated by the phrase "STATE/LOCAL ONLY" after the legal citation.

This section of the permit is formatted differently from the STANDARD TERMS AND CONDITIONS section. Requirements are listed in columns. The actual requirement is given in one column of the table. The regulatory basis for the applicable requirements are listed in another column of the emission limitation tables. The averaging time and reference test method, used to determine compliance with the requirement, are listed in columns, if applicable. The monitoring, recordkeeping, and reporting requirements (MRRR) used to determine compliance with the requirement are listed in the last column of the emission limitation tables. The monitoring, recordkeeping, and reporting requirements (MRRR) are enforceable and are given in the last subsection of the permit. 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 requirement.

For GTN, this section contains six subsections:

FACILITY-WIDE EMISSION LIMITATIONS;  
UNIT 6A EMISSION LIMITATIONS;  
UNIT 6B EMISSION LIMITATIONS;  
UNIT 6C EMISSION LIMITATIONS;  
EMERGENCY GENERATOR EMISSION LIMITATIONS; AND  
MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (MRRR).

Each subsection and its contents are discussed in detail below except for the MRRR. MRRR are discussed in context of the applicable requirement(s) to which they apply.

If an applicable requirement is included in the permit, but was not included in the source's application, a note to this effect can be found after the citation.

If an applicable requirement does not include sufficient monitoring, recordkeeping, and reporting to satisfy WAC 173-401-615(1) & (2), the permit will establish adequate monitoring, recordkeeping and reporting. This is known as gapfilling. Applicable requirements for which this type of gapfilling is proposed can be identified by the note, following the MRRR citation, indicating that at least a portion of the MRRR is from gapfilling.

### **Facility-wide Emission Limitations**

This subsection contains applicable emission limitations that apply facility-wide. The facility-wide emission limitations apply to insignificant emission units. However, monitoring, recordkeeping and reporting requirements are not required for the insignificant emission units because SRCAA has determined that they are not necessary to assure compliance with facility-wide emission limitations. GTN is required to certify compliance with the facility-wide emission limitations for insignificant emission units (see Condition 30 of permit).

The following requirements are included in this section.

Condition 46: All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040. [WAC 173-400-040, 8/20/93] [WAC 173-400-040, 8/15/01 – STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Condition 47: Visible emissions shall not exceed 20%, as specified in WAC 173-400-040. [WAC 173-400-040(1), 173-400-040(1)(a), & 173-400-040(1)(b), 8/15/01 (8/20/93)]

MRRR: Because the only significant emission units at the site are combustion units, fueled exclusively with natural gas, compliance with the opacity requirement is assured by certification that only natural gas is used.

While there are other insignificant emissions, as defined in WAC 173-401-530 at the site to which this requirement may apply (e.g., fugitive dust), SRCAA has determined that monitoring, recordkeeping and reporting are not required for the insignificant emission units at GTN to assure compliance with facility-wide emission limitations. GTN is required to certify compliance with this emission limitation for insignificant emission units.

[WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilled MRRR

Condition 48: Visible Emissions shall not equal or exceed 20%, as specified in SRCAA Regulation I, 6.02 - STATE/LOCAL ONLY [SRCAA Regulation I, 6.02, 7/6/95 - STATE/LOCAL ONLY]

MRRR: The same monitoring is required as for Visible Emissions, WAC 173-400-040, given in Condition 47. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilled MRRR

Condition 49: No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited or to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited. [WAC 173-400-040(2), 1/10/05 - STATE/LOCAL ONLY] [SRCAA Regulation I, Section 6.05.A, 3/4/04(11/12/93)]

MRRR: GTN must perform quarterly inspections of the facility during daylight hours of the emission units and activities at the facility to verify that deposition is not occurring (or if it is that is not unreasonably interfering with others use and enjoyment of property) and must record and investigate complaints received regarding deposition.

Potential fugitive emissions from the facility include dust from roads and parking lots. Quarterly inspections should reasonably assure compliance because GTN has a consistent compliance history and does not have a lot of fugitive emission sources (i.e., the likelihood of violation is low). During normal operation, fugitive particulate matter is not generated at the facility.

If violations of the requirement are observed during the quarterly inspections and/or as part of the complaint investigation, GTN must take timely and appropriate corrective action.

Taking corrective action does not relieve GTN from the obligation to comply with the underlying emission limitation, nor does it relieve GTN from reporting any permit deviations as required in Condition 28-Prompt Reporting of Deviations.

GTN must maintain records of each inspection and complaint investigation. Records must include the date and time of the inspection, observations made, the date and time of any complaints received, the date and time of the complaint investigation, the results of complaint investigations, a description of any corrective action taken, and any other information required in permit condition 22-Records of Required Monitoring Information. Records must be kept in accordance with Condition 26-Retention of Records, and, upon request, such records must be made available for inspection by SRCAA staff or other authorized representatives.

If GTN is unable to perform a quarterly inspection, due to unavoidable circumstances, the inspection may be waived, provided that records are kept documenting the missed inspection and reason(s) the inspection was not performed.

GTN must develop and follow a monitoring plan detailing how the above inspections will be performed; how inspection records will be kept; and a system for recording and investigating complaints received.

For permit conditions that require reasonable precautions to be taken or that call for the use of recognized good practices or procedures or effective control apparatus and measures, examples of reasonable precautions; recognized good practices and procedures; and effective control apparatus and measures are given in the permit.

[WAC 173-401-615(1) &(2), 9/16/02] NOTE: This is a gapfilled MRRR

Condition 50: Reasonable precautions must be taken to:

- a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads;
- b. Prevent tracking of PM onto paved roadways open to the public;
- c. Prevent the release of air contaminants, as specific in WAC 173-400-040(3)(a), if located in an attainment area and not impacting a NAA;
- d. Prevent PM from becoming airborne when handling, transporting, and /or storing PM; and
- e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.

SRCAA Regulation I, Section 6.05.C, 3/4/04(11/12/93)] [SRCAA Regulation I, 6.05.D, 3/4/04(11/12/93)] [WAC 173-400-040(3)(a), 1/10/05(11/12/93)] [SRCAA Regulation I, Section 6.05.B, 3/4/04(11/12/93)] [WAC 173-400-040(8)(a), 1/10/05(8/20/93)]

MRRR: The same monitoring is required as for WAC 173-400-040(2) – Deposition, given in Condition 49. GTN must perform quarterly inspections during daylight hours at the facility, investigate complaints, and take corrective action if potential problems are identified. A monitoring plan is required and records must be kept. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilled MRRR

Condition 51: Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(4) – STATE / LOCAL ONLY [WAC 173-400-040(4), 1/10/05 - STATE/LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(2) - Deposition, given in Condition 49. GTN must perform quarterly inspections during daylight hours at the facility, investigate complaints, and take corrective action if potential problems are identified. A monitoring plan is required and records must be kept. Examples of what are considered reasonable precautions are included in the monitoring condition. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilled MRRR

Condition 52: Effective control apparatus and measures shall be installed and operated to reduce odor-bearing gases and particulate matter to a reasonable minimum – STATE/LOCAL ONLY [SRCAA Regulation I, Section 6.04, 3/4/04- STATE/LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(2) – Deposition, given in Condition 49. GTN must perform quarterly inspections during daylight hours at the facility, investigate complaints, and take corrective action if potential problems are identified. A monitoring plan is required and records must be kept. Examples of what are considered reasonable precautions are included in the monitoring condition. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilled MRRR

Condition 53: No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business- STATE/LOCAL ONLY [WAC 173-400-040(5), 1/10/05(8/20/93)] [SRCAA Regulation I, Section 6.06.A, 3/4/04- STATE/LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(2) – Deposition, given in Condition 49. GTN must perform quarterly inspections during daylight hours at the facility, investigate complaints, and take corrective action if potential

problems are identified. A monitoring plan is required and records must be kept. Examples of what are considered reasonable precautions are included in the monitoring condition. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilled MRRR

Condition 54: No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC - STATE/LOCAL ONLY [WAC 173-400-040(7), 8/15/01(8/20/93)] [SRCAA Regulation I, 6.07, 3/4/04-STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 55: Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf, corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3). [WAC 173-400-050(1) & WAC 173-400-050(3), 8/15/01(2/19/91)]

MRRR: The sole use of natural gas is sufficient to assure compliance with this requirement. The permittee will be required to certify that only natural gas was used. [WAC 173-401-615(1) &(2), 9/16/02] NOTE: This is a gapfilled MRRR

Condition 56: Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060 [WAC 173-400-060, 2/19/91] [WAC 173-400-060, 1/10/05 – STATE/LOCAL ONLY]

MRRR: No monitoring, recordkeeping, or reporting is required. The only general process units, as defined in WAC 173-400-030(32), are insignificant emission units. SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units at GTN to assure compliance with the generally applicable requirements (see section on Insignificant Emission Units for more information).

Condition 57: SO<sub>2</sub> emissions from each unit shall not exceed 1000 ppm at 7% O<sub>2</sub>, as specified in WAC 173-400-040(6) [WAC 173-400-040(6), 1/10/05(8/20/93) - NOTE: The second paragraph of WAC 173-400-040(6) is STATE/LOCAL ONLY]

MRRR: Because SO<sub>2</sub> emissions at this source would only occur from combustion units, monitoring for this requirement consists of using only allowed fuels. The permit limits the source to use of natural gas. Equipment burning natural gas should always meet the SO<sub>2</sub> limit. [WAC 173-401-615(1) & (2), 9/16/02] NOTE: This is a gapfilled MRRR.

Condition 58: No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200. [WAC 173-400-200, 2/19/91]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 59: No varying of emissions according to atmospheric conditions or ambient concentrations except as allowed under WAC 173-400-205. [WAC 173-400-205, 2/19/91]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 60: No outdoor burning, except as allowed under Chapter 173-425 WAC and/or Regulation I of SRCAA, Section 6.01. [Chapter 173-425 WAC, 3/13/00(10/18/90)] [SRCAA Regulation I, Section 6.01, 3/4/04 - STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this prohibited activity was conducted during the reporting period.

Condition 61: Handling and use of ozone-depleting substances must be in accord with 40 CFR Part 82. [40 CFR Part 82, 2001 (except those subparts for which a shield is granted in Section III below)]

MRRR: Additional monitoring, recordkeeping, and reporting requirements are not necessary to assure compliance with this condition, because the monitoring, recordkeeping, and reporting requirements are included with the applicable requirement (i.e., 40 CFR Part 82, 2001). As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Comment [CES3]: Per Elizabeth Waddell 7/31/02 – Latest Publication

### Unit 6A Emission Limitations

This subsection of the permit contains applicable requirements and corresponding monitoring, recordkeeping, and reporting requirements that apply to Unit 6A at the facility. Unit 6A went

through new source review in 1990 (PSD #90-02) and 1992 (NOC #404). Unit 6A is also subject to the requirements of 40 CFR Part 60, Subpart GG, and "Standards of Performance for Stationary Gas Turbines." The applicable requirements from PSD #90-02, NOC #404, and 40 CFR 60, Subpart GG are included in this section.

The following requirements are included:

Condition 62: Except for as allowed in 40 CFR § 60.8(c), NO<sub>x</sub> emissions shall not exceed 199 ppm dry basis, corrected to 15% oxygen and ISO conditions. 40 CFR § 60.332(a)(2), (a)(3), (d), & § 60.8(c), 7/8/04] [WAC 173-400-115, 5/8/07]

MRRR: Past source testing conducted on Unit 6A has shown NO<sub>x</sub> levels well below 199 ppm. GTN tested the NO<sub>x</sub> emissions from Unit 6A in 1994, 1995, 1996, 1998, and 2003. The source test results ranged from 15.9 to 30.5 ppm at 15% O<sub>2</sub> ISO.

NOC #404 requires GTN to monitor NO<sub>x</sub> emissions, either with a continuous emission monitoring system (CEMS), or with the alternate monitoring plan, dated April 2, 2007 (revised from original plan, dated July 13, 1998), or a subsequently SRCAA approved amendment. GTN has used an alternate monitoring plan since 1998 in lieu of a CEMS. The alternate monitoring system includes monitoring and review of operating parameters, including gas generator speed, fuel consumption, unit fired hours, and compressor pressure differential to assure that the turbine is operating properly. The monitored parameters are used in conjunction with emission factors to calculate emissions on a monthly basis. The permittee is required to keep records of the monitored parameters and monthly emission calculations. The alternate monitoring plan is sufficient to monitor the NO<sub>x</sub> emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NO<sub>x</sub> levels measured during previous source tests.

In order to assure that the emission factors are accurate, if an alternate monitoring system is used, periodic source testing is required to verify emission factors associated with the monitoring system. The frequency of the testing depends on how close to the standard the results were from the most recent source test. The minimum frequency is once every five years.

Since the NSPS NO<sub>x</sub> limit does not apply during start-ups, shutdowns, or malfunctions, GTN is required to keep records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of Unit 6A; and any malfunction of the air pollution control equipment; if such records are used for purposes of demonstrating compliance with emission limits given in 40 CFR 60, Subpart GG.

In addition to the NO<sub>x</sub> monitoring, the permittee is only allowed to burn natural

gas in Unit 6A, which limits the amount of nitrogen available from the fuel.

[WAC 173-400-615(1)& (2), 9/16/02] [PSD #90-02 Amendment 1, Conditions 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00] [40 CFR § 60.7(b) & (f), 2/12/99] [WAC 173-400-115, 5/8/07] NOTE: At least a portion of this MRRR is gapfilling.

Condition 63: NOx emissions shall not exceed 42 ppm (1-hour average) at maximum operating conditions (i.e., maximum achievable load during test) @ 15% oxygen and ISO conditions as defined in 40 CFR Part 60, Subpart GG. [NOC #404, Condition 2, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: The same monitoring is required as for Condition 62. If testing is done to verify compliance, the testing must be conducted as described in Condition 2 of NOC #404, i.e., at maximum operating conditions, using the average of three 21-minute tests. [WAC 173-400-615(1)& (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00] NOTE: At least a portion of this MRRR is gapfilling.

Condition 64: NOx emissions shall not exceed 42 ppm corrected to 15% oxygen and ISO conditions on a one-hour average. [PSD #90-02 Amendment 1, Condition 1, 7/18/97]

MRRR: The same monitoring is required as for Condition 63. [WAC 173-400-615(1)& (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00] NOTE: At least a portion of this MRRR is gapfilling.

Condition 65: Annual NOx emissions shall not exceed 72.3 tons per year. [PSD #90-02 Amendment 1, Condition 1, 7/18/97] [NOC #404, Condition 2, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: The same monitoring is required as for Condition 73. Based on past source test results for Unit 6A, calculated annual NOx emissions have been well below 72.3 tons per year. The highest calculated annual NOx emissions were 49.5 tons per year, based on results from the 1995 source test.

GTN is required to monitor NOx emissions, either with a continuous emission monitoring system (CEMS), or with the alternate monitoring plan, dated April 2, 2007, or a subsequently SRCAA approved amendment. The alternate monitoring system includes monitoring and review of operating parameters, including gas generator speed, fuel consumption, and compressor pressure differential to assure that the turbine is operating properly. The monitored parameters are used in conjunction with emission factors to calculate emissions on a monthly basis. GTN is also required to conduct periodic source tests to

verify emission factors associated with the monitoring system. The frequency of the testing depends on how close to the standard the unit the results were during the last source test. The minimum frequency is once every five years. The permittee is required to keep records of the monitored parameters and monthly emission calculations. The monitored parameters are used in conjunction with emission factors to calculate emissions on a monthly basis. GTN is required to calculate and keep records of NOx emissions monthly and report NOx emissions to SRCAA annually. The highest annual NOx emissions reported to SRCAA in the past five years (from 2002-2006) from Unit 6A were 42.4 tons per year.

The alternate monitoring plan is sufficient to monitor the NOx emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NOx levels measured during previous source tests.

[WAC 173-400-615(1)& (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00]  
NOTE: At least a portion of this MRRR is gapfilling.

Condition 66: During startup and shutdown, the procedures approved in accordance with Condition 3 of NOC #404 shall be followed. [NOC #404, Condition 2, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition 67: SO2 emissions shall not exceed 1.4 tons per year. [NOC #404, Condition 4, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: GTN is required to monitor the total sulfur content of the fuel being fired in the turbines according to the provisions given in 40 CFR 60.334. Per 40 CFR 60.334(h)(3)(i), GTN may elect not to conduct daily monitoring of the sulfur content of the fuel, provided that 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 is submitted to SRCAA as part of the semi-annual monitoring report described in Condition 27. For any period during which the sulfur content of the fuel being fired in Unit 6A exceeds 0.8% by weight, an excess emission report in accordance with 60.7(c), (d), and (e) shall be submitted to SRCAA.

If GTN conducts daily monitoring of the sulfur content in the natural gas, the permittee shall notify SRCAA if the daily sulfur content in the natural gas exceeds 1 grain per 100 standard cubic feet of gas. The notification shall occur no later

than three business days after the exceedance occurs and include the daily average sulfur content recorded, the anticipated length of time of the exceedance, and the corrective actions taken to bring the sulfur content below 1 grain per 100 standard cubic feet of gas.

The permittee shall maintain a record documenting a constant supplier or source of fuel. A substantial change in fuel quality shall be considered as a change in fuel supply. Any changes in supplier or source of fuel shall be reported to SRCAA and EPA within 60 days of such change.

The permittee shall maintain a record of all turbine operation on fuels other than pipeline quality natural gas. Use of any fuel other than pipeline quality natural gas in the turbine shall be reported to SRCAA and EPA within 60 days of such use.

The permittee shall calculate SO<sub>2</sub> emissions annually by calculating the maximum amount of SO<sub>2</sub> which could be emitted, based on the fuel sulfur content monitoring and assuming that all sulfur is converted to SO<sub>2</sub>. To date, the highest annual SO<sub>2</sub> emissions calculated were 0.9 tons per year in 1999, 2000, and 2001. In the past five years, the highest annual SO<sub>2</sub> emissions calculated were 0.8 tons in 2004.

In addition to the SO<sub>2</sub> monitoring, the permittee is only allowed to burn natural gas in Unit 6A, which limits the amount of sulfur available from the fuel.

[WAC 173-401-615(1) & (2), 9/16/02] [40 CFR § 60.334, 2/24/06] [40 CFR § 60.7(c), (d) & (e), 2000] [WAC 173-400-115, 5/8/07] [PSD #90-02 Amendment 1, Condition 5, 7/18/97] [NOC #404, Condition 5, 15, & 16, 9/16/92 as revised on 7/22/97 and 6/6/00] [NOC #1103, Condition 8, 9, & 10, 5/4/02 as revised on 9/11/02 and 8/31/07] NOTE: At least a portion of this MRRR is gapfilling.

Condition 68: No fuel with sulfur content greater than 0.8% by weight shall be burned<sup>1</sup>. [40 CFR § 60.333(b), 7/8/04] [WAC 173-400-115, 5/8/07]

MRRR: Only natural gas may be burned in the unit. GTN is required to monitor the total sulfur content of the fuel being fired in the turbines according to the provisions given in 40 CFR 60.334. Per 40 CFR 60.334(h)(3)(i), GTN may elect not to conduct daily monitoring of the sulfur content of the fuel, provided that 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 is submitted to SRCAA as part of the semi-annual

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<sup>1</sup> The NSPS allows a choice between this requirement or an emission standard of 150 ppm. GTN has chosen the % sulfur requirement.

monitoring report described in Condition 27. For any period during which the sulfur content of the fuel being fired in Unit 6A exceeds 0.8% by weight, an excess emission report in accordance with 60.7(c), (d), and (e) shall be submitted to SRCAA.

[WAC 173-401-615(1) & (2), 9/16/02] [40 CFR § 60.334, 2/24/06] [40 CFR § 60.7(c), (d) & (e), 2000] [WAC 173-400-115, 5/8/07] [PSD #90-02 Amendment 1, Condition 5, 7/18/97] [NOC #404, Condition 15 & 16, 9/16/92 as revised on 7/22/97 and 6/6/00] [NOC #1103, Condition 8, 9, & 10, 5/4/02 as revised on 9/11/02 and 8/31/07] NOTE: At least a portion of this MRRR is gapfilling.

Condition 69: At all times, including periods of startup shutdown, and malfunction, to the extent practicable, the unit shall be operated in a manner consistent with good air pollution control practice for minimizing emissions.

Determination of whether acceptable operating and maintenance procedures are being used will be based on available information, including, but not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the equipment. [40 CFR § 60.11(d), 2000] [WAC 173-400-115, 5/8/07]

MRRR: The use of NO<sub>x</sub> monitoring and required recordkeeping, as described in the MRRR associated with Condition 62, should assure that the unit is operating in a manner consistent with good air pollution control practice for minimizing emissions. GTN is required to keep records of all measurements for Unit 6A, including continuous monitoring system records.

[PSD #90-02 Amendment 1, Conditions 1 & 4, 7/18/97] [NOC #404, Condition 14 & 16, 9/16/92 as revised on 7/22/97 and 6/6/00] [WAC 173-401-615(1) & (2), 9/16/02] [40 CFR § 60.7(b) & (f), 2/12/99] [WAC 173-400-115, 5/8/07] NOTE: At least a portion of this MRRR is gapfilling.

Condition 70: PM<sub>10</sub> emissions shall not exceed 2.3 tons per year. [NOC #404, Condition 3, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: GTN has reported a maximum of 0.7 tons of PM<sub>10</sub> emissions per year from Unit 6A in the annual emission inventory for calendar year 2004. The use of NO<sub>x</sub> monitoring and required recordkeeping, as described in the MRRR associated with Condition 63, should assure that the unit is operating properly. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, and burning only natural gas, the PM<sub>10</sub> emissions should not deviate significantly from PM<sub>10</sub> levels reported in past emission inventories. [WAC 173-401-615(1) & (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00] NOTE: At least a

portion of this MRRR is gapfilling.

Condition 71: CO emissions shall not exceed 49.5 tons per year. [NOC #404, Condition 5, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: The use of NOx monitoring and required recordkeeping, as described in the MRRR associated with Condition 63, should assure that the unit is operating properly. The emission factor for CO, used in the alternate monitoring plan, is required to be validated by periodic source testing, which is required at least once every five years. Based on source test results for Unit 6A and the alternate monitoring plan, calculated annual CO emissions in the past have been below 49.5 tons per year. The highest annual CO emissions were 34.6 tons per year, reported for 2001. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, and burning only natural gas, the CO emissions should not deviate significantly from CO levels measured during previous source tests. [WAC 173-401-615(1) & (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00] NOTE: At least a portion of this MRRR is gapfilling.

Condition 72: Total VOC emissions shall not exceed 10 tons per year. [NOC #404, Condition 5, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: The use of NOx monitoring and required recordkeeping, as described in the MRRR associated with Condition 63, should assure that the unit is operating properly. Based on source test results for Unit 6A and the alternate monitoring plan, calculated annual VOC emissions in the past have been below 10 tons per year. The highest annual VOC emissions were 7.0 tons per year, reported for 2001. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, and burning only natural gas, the VOC emissions should not deviate significantly from VOC levels measured during previous source tests. [WAC 173-401-615(1) & (2), 10/4/93] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00] NOTE: At least a portion of this MRRR is gapfilling.

Condition 73: Opacity from the exhaust stack shall not exceed 5% for an aggregate of more than 3 minutes in any one hour period. [NOC #404, Condition 7, 9/16/92 as revised on 7/22/97 and 6/6/00] [PSD #90-02 Amendment 1, Condition 2, 7/18/97]

MRRR: The same monitoring is required as for Visible Emissions, WAC 173-400-040. Compliance with the opacity requirement is assured by certification that only natural gas is used. In addition, the use of NOx monitoring and required recordkeeping, as described in the MRRR associated with Condition 63, should assure that the unit is operating properly. The turbine is designed and operated

without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, and burning only natural gas, the opacity should be lower than 5%. [WAC 173-401-615(1) & (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00] NOTE: At least a portion of this MRRR is gapfilling.

Condition 74: The exhaust stack shall be equipped with permanent sampling ports, which meet the requirements of 40 CFR Part 60, Appendix A, Method 1, to allow for collection of stack gas samples, and the permittee shall provide safe access to the stack for testing personnel. [NOC #404, Condition 9, 9/16/92 as revised on 7/22/97 and 6/6/00] [PSD #90-02 Amendment 1, Condition 3, 7/18/97]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition 75: SRCAA shall be notified at least two weeks prior to any planned changes that may affect emissions. [NOC #404, Condition 10, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition 76: Only pipeline quality natural gas shall be used as fuel. [NOC #404, Condition 11, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: GTN is required to certify that only natural gas was used in Unit 6A. In addition, GTN is required to maintain a record of all turbine operation on fuels other than pipeline quality natural gas. Use of any fuel other than pipeline quality natural gas in the turbine must be reported to SRCAA and EPA within 60 days of such use. [WAC 173-401-615(1) & (2), 9/16/02] [40 CFR § 60.334, 2/24/06] [40 CFR § 60.7(c), (d) & (e), 2000] [WAC 173-400-115, 5/8/07] [PSD #90-02 Amendment 1, Condition 5 & 6, 7/18/97] [NOC #404, Condition 15 & 16, 9/16/92 as revised on 7/22/97 and 6/6/00] NOTE: At least a portion of this MRRR is gapfilling.

Condition 77: Operation shall be conducted in compliance with all data and specifications submitted as part of the PSD application unless otherwise approved by the Department of Ecology. [PSD 90-02 Amendment 1, Condition 8, 7/18/97]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition 78: Operating and maintenance manuals for all equipment that has the potential to

affect emissions to the atmosphere shall be developed and followed. Copies of the manuals shall be made available to the Department of Ecology or SRCAA upon request. Emissions that result from a failure to follow the requirements of the manuals may be considered proof that the equipment was not properly operated and maintained. [PSD #90-02 Amendment 1, Condition 7, 7/18/97]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition 79: Like-kind engine exchanges shall not be considered to be new stationary air contaminant sources for the purposes of SRCAA Regulation I, Article V, provided that the requirements of Condition 8M are met. At such a time that the United States Environmental Protection Agency or the Department of Ecology issues findings on air quality requirements that apply to like-kind engine exchanges, this condition is no longer in effect, and SRCAA will revise this condition to be consistent with these findings. [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: The required monitoring for this condition is outlined in NOC #404. For each like-kind engine exchange for Unit 6A, the permittee shall meet the requirements detailed in a. through b. below. At such a time that the United States Environmental Protection Agency or the Department of Ecology issues findings on air quality requirements that apply to like-kind engine exchanges, this condition is no longer in effect, and SRCAA will revise this condition to be consistent with these findings.

- a. The permittee shall notify SRCAA of each engine replacement at least 30 days before the change out or, in situations where the permittee does not know 30 days in advance, within two days of determining that a change out is required.
- b. If Unit 6A is being exchanged, the notification shall include verification that the unit (as identified by a specific serial number) has been tested as required under 40 CFR Part 60, Subpart GG. If the unit has not been tested, a performance test shall be conducted in accordance with 40 CFR Part 60 once the engine is installed at the site.

[NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00]

The following requirements in the NOC and PSD approvals for Unit 6A were not included in the permit for the reasons stated.

CITATION	DESCRIPTION	REASON NOT INCLUDED IN PERMIT
NOC #404, Condition 1	NOx emission limit that expired 9/30/94	The expiration date has passed. The requirement is not longer applicable
NOC #404, Condition 9	Initial source testing requirement	One time requirement at the time of start-up. Initial source testing was conducted on 9/23/94. Results from the source test showed compliance with the NOx, CO, and VOC emission limits.
PSD #90-02, Condition 9	Approval becomes void construction does not begin within 18 months of approval	No longer applicable
PSD #90-02, Condition 10	Statement that any activity undertaken by GTN or others, in a manner inconsistent with the PSD application and approval, shall be subject to enforcement and that nothing in the approval may be construed as to relieve GTN from obligations under any state, local, or federal laws or regulations	Informational
PSD #90-02, Condition 11	Notification of start-up	One time requirement at start-up

#### Unit 6B Emission Limitations

This subsection of the permit contains applicable requirements and corresponding monitoring, recordkeeping, and reporting requirements that apply to Unit 6B at the facility. Unit 6B did not go through new source review because it pre-dates the NOC and PSD permitting programs. However, there are some applicable requirements from NOC #404, related to like-kind engine exchanges, that apply to Unit 6B. These requirements are included in this section.

Condition 80: Like-kind engine exchanges shall not be considered to be new stationary air contaminant sources for the purposes of SRCAA Regulation I, Article V, provided that the requirements of Condition 8M are met. At such a time that the United States Environmental Protection Agency or the Department of Ecology issues findings on air quality requirements that apply to like-kind engine exchanges, this condition is no longer in effect, and SRCAA will revise this condition to be consistent with these findings. [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00]

MRRR: The required monitoring for this condition is outlined in NOC #404. For each like-

kind engine exchange for Unit 6B, the permittee shall meet the requirements detailed in a. through c. below. At such a time that the United States Environmental Protection Agency or the Department of Ecology issues findings on air quality requirements that apply to like-kind engine exchanges, this condition is no longer in effect, and SRCAA will revise this condition to be consistent with these findings.

- a. The permittee shall notify SRCAA of each engine replacement at least 30 days before the change out or, in situations where the permittee does not know 30 days in advance, within two days of determining that a change out is required.
- b. In notifications for Unit 6B change outs, the permittee shall provide a statement as to whether the unit being installed has been or will be reconstructed, as defined in 40 CFR §60.15. If the costs of expenditures on Unit 6B are as described in the GTN letter, dated July 17, 1998 [‘Overhaul versus New Unit’ Cost Comparison for NSPS Reconstruction Criteria, A.J. Cherian], the notification may include a statement to this effect and need not repeat any cost justification.
- c. If Unit 6B is being exchanged, the permittee shall include, in the notification, the date that the engine was manufactured.

[NOC #404, Condition 12, 9/16/92 as revised on 7/22/97 and 6/6/00]

#### **Unit 6C Emission Limitations**

This subsection of the permit contains applicable requirements and corresponding monitoring, recordkeeping, and reporting requirements that apply to Unit 6C at the facility. Unit 6C went through new source review in 2002 (PSD 01-05 and NOC #1103). Unit 6C is also subject to the requirements of 40 CFR Part 60, Subpart GG, “Standards of Performance for Stationary Gas Turbines.” The applicable requirements from PSD 01-05, NOC #1103, and 40 CFR 60, Subpart GG are included in this section.

Condition 81: Only natural gas, taken from the Transcanada GTN pipeline, shall be used to fire Unit 6C. [PSD 01-05 Amendment 1, Condition 1, 11/14/02] [NOC #1103, Condition 5, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: GTN is required to certify that only pipeline quality natural gas was used as fuel in Unit 6C in each compliance certification. [PSD 01-05, Amendment 1, Condition 6, 11/14/02]

Condition 82: Except for as allowed in 40 CFR § 60.8(c), NOx emissions shall not exceed 214 ppm dry basis, corrected to 15% oxygen and ISO conditions. [40 CFR § 60.332(a)(2), (a)(3), (d), & § 60.8(c), 7/8/04] [WAC 173-400-115, 5/8/07]

MRRR: Past source testing conducted on Unit 6C has shown NOx levels well below 214 ppm. GTN tested the NOx emissions from Unit 6C every year from 2002-2007. The source test results ranged from 8.7 – 20.4 ppm at 15% O2 ISO.

PSD 01-05 required GTN to monitor NOx emissions with a continuous emission monitoring system (CEMS). Per the PSD permit, after 3 years of operation, GTN may propose an alternate means of monitoring and reporting NOx emissions to SRCAA and the Department of Ecology for approval. Once approved, the alternate system may be implemented in place of the CEM. GTN operated a NOx CEM on Unit 6C from 2002-2006. As allowed in the PSD permit for Unit 6C, GTN proposed a Station 6 Unit C Proposed NOx Alternate Monitoring Plan, dated June 8, 2006, in place of the NOx Continuous Emission Monitoring as an alternate means of monitoring and reporting NOx emissions. Ecology and SRCAA approved the alternate monitoring plan. GTN is required to meet the Station 6 Unit C Proposed NOx Alternate Monitoring Plan, dated June 8, 2006, or a subsequent Ecology and SRCAA approved version. The alternate monitoring system includes monitoring and review of operating parameters, including monthly fuel consumption, monthly fired hours, and ambient inlet temperature. The monthly data reports are reviewed for "reasonableness." Any data unavailability, abnormalities, or adverse trends will be identified and corrective actions initiated by GTN. The monitored parameters are used in conjunction with emission factors to calculate emissions on a monthly basis. The emission factors were developed based on the 2002 – 2006 source test data for Unit 6C. GTN is required to keep records of the monitored parameters and monthly emission calculations.

The alternate monitoring plan is sufficient to monitor the NOx emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NOx levels measured during previous source tests.

To verify the emissions are consistent with previous source tests, GTN is required to perform one performance test for NOx emissions during the first year of the permit term and then one performance test during the remainder of the permit term, unless the test results show emissions that are more than 70% of the permit limits. If test results are greater than 70% of permitted limits, GTN will be required to conduct more frequent performance tests according to the frequency given in Condition 12M of the permit.

Since the NSPS NOx limit does not apply during start-ups, shutdowns, or malfunctions, GTN is required to keep records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of Unit 6C; if such records are used for purposes of demonstrating compliance with emission limits given in

40 CFR 60, Subpart GG.

In addition to the NOx monitoring, GTN is only allowed to burn natural gas in Unit 6C, which limits the amount of nitrogen available from the fuel.

GTN is required to keep records and report the total NOx emissions from the Solar Titan turbine during the previous 12 month period to SRCAA semiannually with the monitoring report described in Condition 27.

[PSD 01-05 Amendment 1, Conditions 9, 12, & 14, 11/14/02] [40 CFR § 60.7(b) & (f), 2000] [WAC 173-400-115, 5/8/07] [WAC 173-401-615(1)&(2), 9/16/02] -  
NOTE: At least a portion of this MRRR is gapfilling.

Condition 83: Emissions of nitrogen oxides (NOx) shall not exceed the limits given below, corrected to 15 percent oxygen and ISO conditions, based on a one-hour block average. The emissions limits given below, in units of ppm, do not apply during startup, shutdown, load changes and step to idle periods.

<u>Operating Conditions</u>	<u>NOx Emission Limit</u>
Hourly average ambient temperature greater than or equal to 0° F.	25.0 ppm
Hourly average ambient temperature less than 0° F.	42.0 ppm
Startup/ shutdown/ step to idle/load change	0.330 lb/mscf

[PSD 01-05 Amendment 1, Conditions 4 & 10, 11/14/02]

MRRR: Past source testing conducted on Unit 6C has shown NOx levels below 25 ppm. GTN has tested the NOx emissions from Unit 6C every year from 2002-2007. The source test results ranged from 8.7 – 20.4 ppm at 15% O2 ISO. In addition, three years of operation of a NOx CEM did not show any periods when the NOx emissions from Unit 6C were over the limits given in Condition 83.

The same monitoring, recordkeeping, and reporting are required as for Condition 82. GTN is required to follow the Station 6 Unit C Proposed NOx Alternate Monitoring Plan, dated June 8, 2006, or a subsequent Ecology and SRCAA approved version. The alternate monitoring plan is sufficient to monitor the NOx emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly

from NOx levels measured during previous source tests. GTN is required to conduct one performance test within one year of permit issuance and one additional test during the remaining permit term, unless test results are greater than 70% of permitted limits. If test results are greater than 70% of permitted limits, GTN will be required to conduct more frequent performance tests according to the schedule given in Condition 12M of the permit.

In addition to the NOx monitoring, GTN is only allowed to burn natural gas in Unit 6C, which limits the amount of nitrogen available from the fuel.

[PSD 01-05 Amendment 1, Conditions 9, 12, & 14, 11/14/02] [40 CFR § 60.7(b) & (f), 2000] [WAC 173-400-115, 5/8/07] [WAC 173-401-615(1)&(2), 9/16/02] - NOTE: At least a portion of this MRRR is gapfilling.

Condition 84: Emissions of nitrogen oxides (NOx) shall not exceed 85.0 tons per year, based on a 12 month rolling total. Emissions that occur during startup, shutdown, load changes and step to idle periods shall be counted towards compliance with the annual emission limit and shall be based upon vendor recommendations or source test data. [PSD 01-05 Amendment 1, Conditions 4 & 10, 11/14/02]

MRRR: The same monitoring, recordkeeping, and reporting are required as for Condition 82. GTN is required to follow the Station 6 Unit C Proposed NOx Alternate Monitoring Plan, dated June 8, 2006, or a subsequent Ecology and SRCAA approved version. The alternate monitoring plan is sufficient to monitor the NOx emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NOx levels measured during previous source tests. GTN is also required to perform a performance test for NOx within the first year of permit issuance and an additional test during the remaining permit term. If test results are greater than 70% of permit limits, GTN is required to test more frequently, according to the schedule given in Condition 12M of the permit.

As part of the reporting requirements, GTN is required to report total NOx emissions from the Solar Titan turbine during the previous 12 month period. Based on past source test results for Unit 6C, calculated annual NOx emissions have been well below 85.0 tons per year. The highest calculated annual NOx emissions were 26.9 tons per year in 2006.

[PSD 01-05 Amendment 1, Conditions 9, 12, & 14, 11/14/02] [40 CFR § 60.7(b) & (f), 2000] [WAC 173-400-115, 5/8/07] [WAC 173-401-615(1)&(2), 9/16/02] - NOTE: At least a portion of this MRRR is gapfilling.

Condition 85: Any activity, which is undertaken by the permittee or others, in a manner which is inconsistent with the PSD 01-05 application or determination, shall be subject to

enforcement under the application regulations. [PSD 01-05 Amendment 1, Condition 15, 11/14/02]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition 86: A copy of NOC #1103 and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request. [NOC #1103, Condition 1, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition 87: Unit 6C shall be maintained in proper working condition. [NOC #1103, Condition 2, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: NOC #1103 and PSD 01-05 outline the monitoring required for this condition. GTN is required to develop and maintain an operation and maintenance (O&M) plan for the Solar Titan turbine. The O&M plan shall identify operational parameters and practices that constitute proper operation of the turbine and shall incorporate manufacturer recommended practices aimed at reducing emissions from the turbine. At a minimum, the O&M manual shall include:

- a. A description of the periodic maintenance activities that will be performed;
- b. The frequency each maintenance activity will be performed;
- c. Sample recordkeeping form(s) to be used to document the date and nature of maintenance activities performed; and
- d. Corrective actions to be taken if any operating parameter is outside of the normal range.

Once developed, the O&M plan must be followed. The O&M manual shall be maintained by the permittee and made available for review by state, federal, and local agencies. Records shall be kept to document that the O&M plan is followed.

[PSD 01-05 Amendment 1, Condition 13, 11/14/02] [NOC #1103, Condition 2, 4/4/02 as revised on 9/11/02 and 8/31/07]

Condition 88: The exhaust stack shall have a minimum height of 59 feet above ground level and shall exhaust vertically. No elbows, tees, or stack caps that impede the vertical flow of air shall be installed at the end of the stack. [NOC #1103, Condition 3, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this condition was met during the reporting period.

Condition 89: Visible emissions from the exhaust stack shall not exceed 5% opacity during any six-minute average. [NOC #1103, Condition 4, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: During the initial source test, performed in August, 2002, the Method 9 tests showed 0% opacity from Unit 6C. Therefore, provided the unit is properly operated and maintained, the opacity should be consistent with the levels during the source test. Compliance with the opacity requirement is assured by proper O&M, as outlined in the MRRR associated with Condition 87. In addition, the use of only natural gas should minimize visible emissions from the turbine. Lastly, the use of the Station 6 Unit C Proposed NO<sub>x</sub> Alternate Monitoring Plan, dated June 8, 2006, as described in the MRRR associated with Condition 82, should assure that the unit is operating properly.

[PSD 01-05 Amendment 1, Condition 6, 9, & 13 11/14/02] [NOC #1103, Condition 2, 16, & 21, 4/4/02 as revised on 9/11/02 and 8/31/07] [WAC 173-401-615(1)&(2), 9/16/02] - NOTE: At least a portion of this MRRR is gapfilling.

Condition 90: The sulfur content of the natural gas burned in Unit 6C shall not exceed 0.8% by weight. [NOC #1103, Condition 7, 4/4/02 as revised on 9/11/02 and 8/31/07] [40 CFR § 60.333(b), 7/8/04] [WAC 173-400-115, 5/8/07]

MRRR: Only natural gas may be burned in the unit. GTN is required to monitor the total sulfur content of the fuel being fired in the turbines according to the provisions given in 40 CFR 60.334. Per 40 CFR 60.334(h)(3)(i), GTN may elect not to conduct daily monitoring of the sulfur content of the fuel, provided that 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 is submitted to SRCAA as part of the semi-annual monitoring report described in Condition 27. For any period during which the sulfur content of the fuel being fired in Unit 6A exceeds 0.8% by weight, an excess emission report in accordance with 60.7(c), (d), and (e) shall be submitted to SRCAA.

Since the NSPS SO<sub>2</sub> limit does not apply during start-ups, shutdowns, or malfunctions, GTN is required to keep records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of Unit 6C; and any malfunction of the air pollution control equipment; if such records are used for purposes of demonstrating compliance with emission limits given in 40 CFR 60, Subpart GG.

[40 CFR § 60.334, 2/24/06] [40 CFR § 60.7, 2000] [WAC 173-400-115, 5/8/07] [PSD #90-02 Amendment 1, Condition 5 & 12, 7/18/97] [NOC #1103, Condition 8, 9, 10, 16, & 21, 5/4/02 as revised on 9/11/02 and 8/31/07] [WAC 173-401-615(1)&(2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

Condition 91: At all times, including periods of startup shutdown, and malfunction, to the extent practicable, the unit shall be operated in a manner consistent with good air pollution control practice for minimizing emissions.

Determination of whether acceptable operating and maintenance procedures are being used will be based available information, including, but not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the equipment. [40 CFR § 60.11(d), 2000] [WAC 173-400-115, 5/8/07]

MRRR: GTN is required to develop and follow an operation and maintenance (O&M) plan for the Solar Titan turbine, as described in the MRRR associated with Condition 87.

[PSD 01-05 Amendment 1, Condition 13, 11/14/02] [NOC #1103, Condition 2, 16, & 21, 4/4/02 as revised on 9/11/02 and 8/31/07] [40 CFR § 60.7(b) & (f), 2000] [WAC 173-400-115, 5/8/07] [WAC 173-401-615(1)&(2), 9/16/02] – NOTE: At least a portion of this MRRR is gapfilling.

Condition 92: Emissions of carbon monoxide (CO) shall not exceed the limits given below, corrected to 15 percent oxygen and ISO conditions, based on a one-hour block average.

<u>Operating Conditions</u>	<u>CO Emission Limit</u>
Between 90% and 100% gas generator speed with hourly average ambient temperature above 0° F	50.0 ppmv
Between 90% and 100% gas generator speed with hourly average ambient temperature between -40° and 0° F	100.0 ppmv

[NOC #1103, Condition 11, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: Past source testing conducted on Unit 6C has shown CO levels below 50 ppmv, except during the 2006 source test, which showed CO emissions above 50 ppmv. The exceedance was determined to be caused by mechanical failure (cracked fuel injector), which has been repaired. GTN has tested the CO emissions from Unit 6C every year from 2002-2007. All of the tests have been performed with ambient temperature above 0° F. The CO emissions from the turbine measured during the source tests ranged from 7.6 ppm @ 15% O2 ISO at 99% load to 34.4 ppm @ 15% O2 ISO at 90% load, using EPA Method 10 (not including the 2006 test results which were high due to a mechanical problem).

Since the CO emissions have been below the limit of 50 ppm @ 15% O2 ISO during the source tests (not including the 2006 test which were not representative due to a mechanical problem), compliance with the CO emission limit is assured by proper O&M, as outlined in the MRRR associated with Condition 87. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, the CO emissions should be consistent with levels measured during the source tests.

In addition to proper O&M, to verify that emissions are consistent with previous source tests, GTN is required to conduct a performance test on Unit 6C within one year of permit issuance, and an additional performance test shall be conducted during the remaining permit term at least one year after the previous test, unless test results are greater than 70% of permitted limits. If test results are greater than 70% of permitted limits, GTN is required to conduct more frequent tests according to the schedule given in Condition 12M of the permit.

The testing specified below shall be conducted, unless alternate test methods or equivalent tests are requested in writing and approved by SRCAA:

- a. A written test plan shall be submitted to SRCAA for review at least 30 days prior the start of each performance test. The test plan must be approved by SRCAA prior to the test.
- b. Testing of the turbine shall be conducted as close as possible to 100% gas generator speed (NGG), 94% NGG, and 92% NGG operating in the SoLoNOx mode. The average of these tests shall be used to calculate the hourly emissions when the turbine is operating between 92%-100% NGG.
- c. Testing of the turbine shall consist of three separate runs at each gas generator speed (NGG)
- d. The gas generator speed (NGG) and ambient temperature must be recorded during each test run and reported with the test results.
- e. The following constituents shall be measured during each run:

- i. Volumetric flow rate and temperature, per EPA Methods 1 & 2 or Method 20;
  - ii. Oxygen (O<sub>2</sub>) & Carbon Dioxide (CO<sub>2</sub>), per EPA Method 20;
  - iii. Oxides of Nitrogen (NO<sub>x</sub>), per EPA Method 7E; and
  - iv. Carbon Monoxide (CO), per EPA Method 10.
- f. A performance test report must be prepared and submitted to SRCAA within 45 calendar days of test completion.

[PSD 01-05 Amendment 1, Condition 13, 11/14/02] [NOC #1103, Condition 2, 12, 16, & 21, 4/4/02 as revised on 9/11/02 and 8/31/07]

Condition 93: Annual CO emissions shall not exceed 88.8 tons per year, based on a twelve month rolling total. CO emissions generated during performance testing required by NOC #1103 while out of SoLoNO<sub>x</sub> mode will not be counted toward the 88.8 tons per year annual limit. However, all CO emissions, including those generated during performance testing while out of SoLoNO<sub>x</sub> mode must be reported on the annual Emission Inventory, required in Condition 29. [NOC #1103, Condition 11, 4/4/02 as revised on 9/11/02]

MRRR: GTN is required to follow the SRCAA approved "CO Emissions Monitoring Plan for Unit 6C," developed by GTN, dated June 13, 2002, to quantify the number of hours that the turbine operates in SoLoNO<sub>x</sub> mode with hourly average ambient temperatures above 0° F; the number of hours that the turbine operates in SoLoNO<sub>x</sub> mode with hourly average ambient temperatures between -40° and 0° F; and the number of hours that the turbine operates out of SoLoNO<sub>x</sub> mode.

Any changes to the above referenced monitoring plan shall be approved by SRCAA prior to implementation. Monthly records shall be kept of the total number of hours that the turbine operates in the modes described above.

The permittee is required to monitor the ambient temperature at the input to the Solar Titan turbine continuously. The temperature sensors shall be serviced and maintained in accordance with the quality assurance / quality control (QA/QC) manual, dated 6/02 (received by SRCAA on 1/28/03). All revisions to the QA/QC manual must be approved by SRCAA prior to implementation.

GTN is required to calculate annual CO emissions from Unit 6C, using the following procedure:

- a. By the 30<sup>th</sup> day after the end of each month, the permittee shall calculate CO emissions for the month. To calculate the monthly emissions, the emissions described in i. – iii. below shall be computed and totaled:

- i. The number of hours in the month that the turbine operated in SoLoNOx mode with hourly average ambient temperatures above 0° F shall be multiplied by the most recent SRCAA approved CO emission factor. The CO emission factor shall be updated after each subsequent performance test, based on the most recent test results, and applied to all hours of operation, which immediately follow the performance test. The permittee shall submit the proposed updated CO emission factor to be used for emission calculations, with each subsequent performance test report, to SRCAA for approval.
  - ii. The number of hours in the month that the turbine operated in SoLoNOx mode with hourly average ambient temperatures between -40° and 0° F shall be multiplied by the most recent SRCAA approved CO emission factor. The CO emission factor shall be updated after each subsequent performance test, based on the most recent test results, and applied to all hours of operation, which immediately follow the performance test. The permittee shall submit the proposed updated CO emission factor to be used for emission calculations, with each subsequent performance test report, to SRCAA for approval.
  - iii. The number of hours in the month that the turbine operated out of SoLoNOx mode shall be multiplied by 467 lb / hr, or a subsequent SRCAA approved CO emission factor for out of SoLoNOx mode.
- b. By the 30<sup>th</sup> day after the end of each month, the permittee shall calculate CO emissions for the most recent twelve months.

Records must be kept of the monthly and most recent 12 month total CO emission calculations

[PSD 01-05 Amendment 1, Conditions 9 & 14, 11/14/02] [NOC #1103, Condition 11, 12, 13, 14, 16, & 21, 4/4/02 as revised on 9/11/02 and 8/31/07] [WAC 173-401-615(1) & (2), 9/16/02] - NOTE: At least a portion of this MRRR is gapfilling.

Condition 94: In the event Unit 6C must be removed for repair or overhaul, the unit may be replaced, as necessary, for routine maintenance, until April 4, 2020, provided that the replacement is a Solar Titan SoLoNOx turbine, rated at 19,500 hp (ISO) and the procedure outlined in Condition 8M is followed. Each replacement turbine must comply with the emission limits given in Condition 101 for CO. For all other pollutants, emissions from each replacement turbine must be equivalent or less than the emission estimates presented in the NOC #1103 application. After April 4, 2020, the next replacement turbine is subject to the new source review requirements in SRCAA Regulation I, Article V and Chapter 173-400 WAC. At such a time that the United States Environmental Protection Agency or the Department of Ecology issues findings on air quality requirements that apply to "like-kind" engine exchanges, this condition is no longer in effect, and the

permittee shall instead comply with the applicable findings. [NOC #1103, Condition 15, 4/4/02 as revised on 9/11/02]

**MRRR:** The required monitoring for this condition is outlined in NOC #1103. The permittee shall meet the requirements detailed in a. and b. below for each like-kind engine exchange for Unit 6C. At such a time that the United States Environmental Protection Agency or the Department of Ecology issues findings on air quality requirements that apply to “like-kind” engine exchanges, this condition is no longer in effect, and the permittee shall instead comply with the appropriate findings.

- a. The permittee shall notify SRCAA in writing of each Unit 6C replacement at least 30 days before the replacements are scheduled to occur. In situations where 30 days advance notice is impossible, due to an unexpected equipment failure or other maintenance problem, the notification shall occur within two days of determining that a replacement is required.
- b. Upon replacement, a performance test shall be performed on the new turbine, in accordance with Condition 15 of NOC #1103 (4/4/02 as revised on 9/11/02 and 8/31/07), or in accordance with conditions identified through a subsequent new source review process.

[NOC #1103, Condition 18, 4/4/02 as revised on 9/11/02 and 8/31/07]

The following requirements in the NOC and PSD approvals for Unit 6C and the emergency generator were not included in the permit for the reasons stated.

<b>CITATION</b>	<b>DESCRIPTION</b>	<b>REASON NOT INCLUDED IN PERMIT</b>
PSD 01-05 Amendment 1, Conditions 4, 5, & 11, 11/14/02	Initial source testing requirement	One time requirement at the time of start-up. Source testing was conducted on the turbine and generator on August 27-29, 2002. Results from the source test showed compliance with the NOx emission limits.
PSD 01-05 Amendment 1, Condition 12a), 11/14/02	Submit performance test data from the initial performance test	Performance test data from initial performance test was submitted to SRCAA on October 9, 2002 (Unit 6C test report) and December 2, 2002 (generator test report).
PSD 01-05 Amendment 1,	Approval becomes void if	Construction began within 18

CITATION	DESCRIPTION	REASON NOT INCLUDED IN PERMIT
Condition 17, 11/14/02	construction does not begin within 18 months of approval	months of approval date
NOC #1103, Condition 1, 4/4/02 as revised on 9/11/02	Start-up notification for Solar Titan gas turbine and emergency generator	Start-up notification was provided to SRCAA
NOC #1103, Condition 2, 4/4/02 as revised on 9/11/02	Approval becomes void if construction does not begin within 18 months of approval	Construction began within 18 months of approval date
NOC #1103, Condition 14, 4/4/02 as revised on 9/11/02	Initial source testing requirement	One time requirement at the time of start-up. Source testing was conducted on August 27-29, 2002. Results from the source test showed compliance with the applicable emission limits.

### Emergency Generator Emission Limitations

This subsection of the permit contains applicable requirements and corresponding monitoring, recordkeeping, and reporting requirements that apply to the emergency generator at the facility. The generator went through new source review in 2002 (PSD 01-05 and NOC #1103). The applicable requirements from PSD 01-05 and NOC #1103 are included in this section.

Condition 95: Only natural gas, taken from the Transcanada GTN pipeline, shall be used to fire the auxiliary generator. [PSD 01-05 Amendment 1, Condition 2, 11/14/02] [NOC #1103, Condition 19, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: GTN is required to certify that only pipeline quality natural gas was used as fuel in Unit 6C in each compliance certification. [PSD 01-05, Amendment 1, Condition 6, 11/14/02]

Condition 96: The auxiliary generator shall not operate for more than 150 hours per year, based on a 12 month rolling total [PSD 01-05 Amendment 1, Condition 3, 11/14/02] [NOC #1103, Condition 20, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: GTN is required to install a non-resettable hour meter on the auxiliary generator to measure the hours of generator operation. Monthly records shall be kept of the hours of operation of the generator. At the end of each month, the hours of operation during the last twelve-month period shall be totaled. Records of the rolling twelve month hours of operation shall be kept. GTN must submit records of the monthly hours of operation to SRCAA. [PSD 01-05 Amendment 1, Conditions 7 & 8, 11/14/02] [NOC #1103, Condition 16, 17, 20, & 21, 4/4/02 as revised on 9/11/02 and 8/31/07] [WAC 173-401-615(1)&(2), 9/16/02] - NOTE: At

least a portion of this MRRR is gapfilling.

Condition 97: NOx emissions from the auxiliary generator shall not exceed 0.48 tons per year, based on a 12 month rolling total. [PSD 01-05 Amendment 1, Condition 5, 11/14/02]

MRRR: GTN is required to install a non-resetable hour meter on the auxiliary generator to measure the hours of generator operation. Monthly records shall be kept of the hours of operation of the generator. At the end of each month, the hours of operation during the last twelve-month period shall be totaled, and the NOx emissions from the generator during the last twelve-month period shall be calculated. The NOx emissions shall be calculated by multiplying the NOx emission rate of the generator at full load by the hours of operation during the last twelve-month period. Records of the rolling twelve month hours of operation and corresponding NOx emissions shall be kept. GTN must submit records of the monthly hours of operation and the corresponding NOx emissions from the generator to SRCAA. [PSD 01-05 Amendment 1, Conditions 7 & 8, 11/14/02] [NOC #1103, Condition 16, 17, 20, & 21, 4/4/02 as revised on 9/11/02 and 8/31/07] [WAC 173-401-615(1)&(2), 9/16/02] - NOTE: At least a portion of this MRRR is gapfilling.

Condition 98: The auxiliary generator shall be maintained in good operating condition. [NOC #1103, Condition 17, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: NOC #1103 and PSD 01-05 outline the monitoring required for this condition. GTN is required to develop and maintain an operation and maintenance (O&M) plan for the generator. The O&M plan shall identify operational parameters and practices that constitute proper operation of the turbine and shall incorporate manufacturer recommended practices aimed at reducing emissions from the turbine. At a minimum, the O&M manual shall include:

- a. A description of the periodic maintenance activities that will be performed;
- b. The frequency each maintenance activity will be performed;
- c. Sample recordkeeping form(s) to be used to document the date and nature of maintenance activities performed; and
- d. Corrective actions to be taken if any operating parameter is outside of the normal range.

Once developed, the O&M plan must be followed. Records shall be kept to document that the O&M plan is followed.

[NOC #1103, Condition 17, 4/4/02 as revised on 9/11/02 and 8/31/07] [PSD 01-05 Amendment 1, Condition 13, 11/14/02]

Condition 99: Visible emissions from the generator exhaust stack shall not exceed 5% opacity during any six-minute average. [NOC #1103, Condition 18, 4/4/02 as revised on 9/11/02 and 8/31/07]

MRRR: Compliance with this requirement is assured by proper O&M, as outlined in the MRRR associated with Condition 98. In addition, the use of only natural gas should minimize visible emissions from the generator. The generator is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by proper O&M and burning only natural gas, the opacity should be lower than 5%. [NOC #1103, Conditions 16, 17, & 21, 4/4/02 as revised on 9/11/02] [PSD 01-05 Amendment 1 & 6, Condition 13, 11/14/02]

### **PERMIT SHIELD FINDINGS**

The final section of the permit lists regulations for which the facility has requested, and SRCAA proposes to grant, a permit shield per WAC 173-401-640(2).

This section will list the requirements for which a shield has been requested and the findings related to this request, i.e., whether or not a shield is appropriate and the facts used to make this determination.

### **Requirements For Which a Shield Will Be Granted**

#### **1PS. Fugitive Emissions Identified as a Significant Contributor to a Nonattainment Area - [WAC 173-400-040(3)(b) and (8)(b), 1/10/05]**

Findings: WAC 173-400-040(3)(b) and (8)(b) apply to any emissions unit which is a source of fugitive emissions that has been identified as a significant contributor to the nonattainment status of a designated nonattainment area. There are no nonattainment areas located in Spokane County, so these sections of the regulation do not apply.

#### **2PS. Emission Standards for Combustion and Incineration Units - [WAC 173-400-050(2), 1/10/05]**

Findings: WAC 173-400-050(2) applies only to incineration units. Since there are no incinerators at GTN, this section of the regulation does not apply.

#### **3PS. Emission Standards for Certain Source Categories - [WAC 173-400-070, 1/10/05]**

Findings: WAC 173-400-070 applies to certain source categories, including wigwam burners, hog fuel burners, sulfuric acid plants, and municipal solid waste landfills. Since GTN does not have any emission units in the source categories covered under WAC 173-400-070, this

regulation does not apply.

4PS. Registration - [WAC 173-400-100, 1/10/05] [WAC 173-400-101, 3/22/95]

Findings: WAC 173-400-100 and 173-400-101 requires certain air contaminant sources to register with the appropriate air pollution control authority. This registration requirement, while no longer a part of the state regulation, is in the State Implementation Plan and is still a federal requirement. The registration requirement is established pursuant to RCW 70.94.151. State law, RCW 70.94.161(17), exempts air operating permit sources from registration programs established pursuant to RCW 70.94.151. Because the permittee is an air operating permit source, the rule does not apply.

5PS. Retrofit Requirements for Visibility Protection - [WAC 173-400-151,1/10/05]

Findings: WAC 173-400-151 applies to existing stationary facilities which have been identified by Ecology to cause or contribute to visibility impairment in any mandatory Class 1 federal area. GTN's Station 6 has not been identified to cause or contribute to visibility impairment in any Class 1 federal areas, so this section does not apply.

6PS. Kraft Pulping Mills, Sulfite Pulping Mills, Primary Aluminum Plants - [Chapter 173-405 WAC, 2/19/91] [Chapter 173-410 WAC, 2/19/91] [Chapter 173-415 WAC, 8/23/05]

Findings: Chapters 173-405, 173-410, and 173-415 WAC, apply to kraft pulping mills, sulfite pulping mills, and primary aluminum plants, respectively. Since GTN's facility does not include any of these sources, these regulations do not apply.

7PS. Agricultural Burning, Solid Fuel Burning Devices, Solid Waste Incinerator Facilities

Findings: Chapters 173-430, 173-433, and 173-434 WAC apply to agricultural burning, solid fuel burning devices, and solid waste incinerator facilities, respectively. Since the facility does not engage in agricultural activities, does not contain any solid fuel burning devices, and is not considered a solid waste incinerator facility, these regulations do not apply. [Chapter 173-430 WAC, 7/26/06] [Chapter 173-433 WAC, 2/3/93] [Chapter 173-434 WAC, 12/22/03]

8PS. Ambient Air Quality Standards and Emission Limits for Radionuclides - [Chapter 173-480 WAC, 5/7/86]

Findings: Chapter 173-480 applies to radionuclide emission units in Washington. Since the facility does not contain any radionuclide emission units, this regulation does not apply.

9PS. State Regulation Establishing Emission Standards for VOC Sources Located in Ozone Nonattainment Areas - [Chapter 173-490 WAC, 2/2/98]

Findings: Chapter 173-490 WAC, Emission Standards and Control for Sources of VOCs, applies only to areas that have been designated as nonattainment for ozone. In addition the

rule only regulates specific categories of VOC sources. Because Spokane County has not been designated as a nonattainment area for ozone, the rule does not apply.

10PS. Motor Fuel Specifications for Oxygenated Gasoline - [Chapter 173-492 WAC, 9/18/96]

Findings: Chapter 173-492 WAC applies to all gasoline offered for sale within Spokane County from October 1 – February 29. Since the permittee does not offer gasoline for sale, this regulation does not apply.

11PS. 40 CFR Part 55 – Outer Continental Shelf Air Regulations - [40 CFR Part 55, 2002]

Findings: This part applies to outer continental shelf sources. Since the facility does not include any outer continental shelf sources, this regulation does not apply.

12PS. 40 CFR Part 57 – Primary Nonferrous Smelter Orders - [40 CFR Part 57, 2002]

Findings: This part applies to certain nonferrous smelters. Since the facility does not include any nonferrous smelters, this regulation does not apply.

13PS. 40 CFR Part 58 – Ambient Air Quality Surveillance - [40 CFR Part 58, 2002]

Findings: This part applies to certain sources that are required to conduct ambient air quality surveillance. GTN is not required to conduct air quality surveillance, so this regulation does not apply.

14PS. 40 CFR Part 60 – Standards of Performance for New Stationary Sources - [40 CFR Part 60, excluding Subpart A, Subpart GG, and Appendices A and B, 2000] [WAC 173-400-115, excluding Subpart A, Subpart GG, and Appendices A and B, 5/8/07]

Findings: A permit shield is granted for all portions of 40 CFR Part 60, except Subpart A, Subpart GG, and Appendices A and B. Unit 6A and 6C are subject to 40 CFR 60, Subpart GG, because they are stationary gas turbines which commenced construction, modification, or reconstruction after October 3, 1977. Unit 6B may be subject to Subpart GG if an engine change out or another project constitutes a modification or a reconstruction.

15PS. 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants As Listed in Table III.A-1 - [40 CFR Part 61, Subparts as listed in Table III.A-1, 2002] [WAC 173-400-075(1), Subparts as listed in Table III.A-1, 5/8/07]

Findings: Table III.A-1 lists subparts of 40 CFR Part 61 for which a shield is granted. A summary of the reason the shield is granted is also provided.

Table III.A-1

SUBPART OF 40 CFR PART 61	SOURCES TO WHICH THE SUBPART APPLIES	FINDINGS
Subpart B	Certain uranium mines	The facility is not the type of source regulated.
Subpart C	Certain plants that process various beryllium compounds including pure beryllium.	The facility is not the type of source regulated.
Subpart D	Rocket motor test sites	The facility is not the type of source regulated.
Subpart E	Stationary sources that process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge.	The facility is not the type of source regulated.
Subpart F	Plants which produce ethylene dichloride by certain processes, produce vinyl chloride, and/or produce polymers containing any fraction of polymerized vinyl chloride.	The facility is not the type of source regulated.
Subpart H	Certain facilities owned or operated by the Department of Energy.	The facility is not the type of source regulated.
Subpart J	Certain equipment intended to operate in benzene service.	The facility is not the type of source regulated.
Subpart K	Calciners and nodulizing kilns at phosphorous plants.	The facility is not the type of source regulated.
Subpart L	Certain sources at furnace and foundry coke by-product recovery plants.	The facility is not the type of source regulated.
Subpart N	Glass melting furnaces using commercial arsenic as a raw material.	The facility is not the type of source regulated.
Subpart O	Copper converter at any new or existing primary copper smelter except as otherwise noted in the rule.	The facility is not the type of source regulated.
Subpart P	Metallic arsenic production plants and arsenic trioxide plants that process low-grade arsenic bearing materials	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 61	SOURCES TO WHICH THE SUBPART APPLIES	FINDINGS
	by a roasting condensation process.	
Subpart Q	Certain storage and disposal facilities for radium-containing material that are owned or operated by the Department of Energy.	The facility is not the type of source regulated.
Subpart T	Owners or operators of sites that are used for the disposal of tailings, and that manage residual radioactive material during and following the processing of uranium ores.	The facility is not the type of source regulated.
Subpart V	Certain sources that are intended to operate in volatile hazardous air pollutant (VHAP) service including control devices required by this subpart.	The facility is not the type of source regulated.
Subpart W	Facilities licensed to manage uranium byproduct materials during and following the processing of uranium ores.	The facility is not the type of source regulated.
Subpart Y	Storage vessels that store benzene with specific gravities as specified in the subpart unless otherwise exempted in the subpart.	The facility is not the type of source regulated.
Subpart BB	Loading racks at which benzene is loaded into a transport vehicle at a benzene production facility or bulk terminal unless otherwise exempted in the subpart.	The facility is not the type of source regulated.
Subpart FF	Owners and operators of chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries. Also, hazardous waste treatment, storage and disposal facilities that treat, store, or dispose of hazardous waste generated by chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries.	The facility is not the type of source regulated.

16PS. 40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants As Listed in Table III.A-2 - [40 CFR Part 63, Subparts as listed in Table III.A-2, 2002] [WAC 173-400-075(5), Subparts as listed in Table III.A-2, 5/8/07]

Findings: Table III.A-2 lists subparts of 40 CFR Part 63 for which a shield is granted. A summary of the reason the shield is granted is also provided.

Table III.A-2

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subpart F, G, & H	Certain chemical manufacturing plants as specified in the rule.	The facility is not the type of source regulated.
Subpart I	Certain chemical manufacturers as specified in the rule.	The facility is not the type of source regulated.
Subpart L	By-product and nonrecovery coke oven batteries at coke plants.	The facility is not the type of source regulated.
Subpart M	Dry cleaning facilities which use perchloroethylene.	The facility is not the type of source regulated.
Subpart N	Hard chromium electroplating, decorative chrome electroplating, and chromium anodizing.	The facility is not the type of source regulated.
Subpart O	Sterilization facilities except as otherwise exempted under the rule.	The facility is not the type of source regulated.
Subpart Q	Certain industrial process cooling towers using chromium based water treatment chemicals.	The facility is not the type of source regulated.
Subpart R	Certain bulk gasoline terminals and pipeline breakout stations. (The term pipeline refers to gasoline pipelines.)	The facility is not the type of source regulated.
Subpart T	Certain solvent cleaning machines using solvents listed in the rule.	The facility is not the type of source regulated.
Subpart U	Certain elastomer product process units including wastewater streams and wastewater operations associated with the elastomer product process unit(s).	The facility is not the type of source regulated.
Subpart W	Certain manufacturers of basic liquid epoxy resins and wet strength resins.	The facility is not the type of source regulated.
Subpart X	Certain sources at secondary lead smelters.	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subpart Y	Affected sources as defined in the rule. (Source(s) means any location where at least one dock or loading berth is bulk loading onto marine tank vessels, except offshore drilling platforms and lightering operations.)	The facility is not the type of source regulated.
Subpart AA	Phosphoric acid manufacturing plants	The facility is not the type of source regulated.
Subpart BB	Phosphate fertilizer production plants	The facility is not the type of source regulated.
Subpart CC	Petroleum refining process units and related emission points (as specified in the rule) that are at the plant site.	The facility is not the type of source regulated.
Subpart DD	Major sources of hazardous air pollutant that receives off-site materials and operates a waste management or recovery operation listed in the rule.	The facility is not the type of source regulated.
Subpart EE	Certain magnetic tape manufacturing operations.	The facility is not the type of source regulated.
Subpart GG	Major sources of hazardous air pollutants which manufacture or rework aerospace vehicles or components.	The facility is not the type of source regulated.
Subpart HH	Oil and natural gas production facilities	The facility is not the type of source regulated.
Subpart II	Major sources of hazardous air pollutants which build or repair ships.	The facility is not the type of source regulated.
Subpart JJ	Major sources of hazardous air pollutants that manufacture wood furniture or wood furniture components.	The facility is not the type of source regulated.
Subpart KK	Major source of hazardous air pollutants at which certain printing presses are operated.	The facility is not the type of source regulated.
Subpart LL	Primary aluminum reduction plants	The facility is not the type of source regulated.
Subpart MM	Chemical recovery combustion sources at various pulp mills	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subpart OO	Certain tanks for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart PP	Certain containers for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart QQ	Certain surface impoundments for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart RR	Certain individual drain systems for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart SS	Closed vent systems, control devices, recovery devices, and routing to a fuel gas system or a process for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart TT and UU	Equipment leaks for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart	The facility is not the type of source regulated.
Subpart VV	Certain oil-water separators and organic-water separators for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart WW	Certain storage vessels for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart XX	Heat exchange systems and waste streams at new and existing ethylene production units.	The facility is not the type of source regulated.
Subpart YY	Source categories and affected sources specified in § 63.1103(a) through (h).	The facility is not the type of source regulated.
Subpart CCC	HCl process facilities and hydrochloric acid regeneration plants.	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subpart DDD	Mineral wool production facilities.	The facility is not the type of source regulated.
Subpart EEE	Hazardous waste combustors.	The facility is not the type of source regulated.
Subpart GGG	Pharmaceuticals production facilities.	The facility is not the type of source regulated.
Subpart HHH	Major sources of hazardous air pollutants that are natural gas transmission and storage facilities	Since the facility is not a major source of hazardous air pollutants, Subpart HHH does not apply.
Subpart III	Flexible polyurethane foam production facilities	The facility is not the type of source regulated.
Subpart JJJ	Certain thermoplastic product process units.	The facility is not the type of source regulated.
Subpart LLL	Portland cement manufacturing industry	The facility is not the type of source regulated.
Subpart MMM	Pesticide active ingredient production	The facility is not the type of source regulated.
Subpart NNN	Wool fiberglass manufacturing facilities	The facility is not the type of source regulated.
Subpart OOO	Manufacture of amino/phenolic resins	The facility is not the type of source regulated.
Subpart PPP	Polyether polyols production	The facility is not the type of source regulated.
Subpart RRR	Secondary aluminum production	The facility is not the type of source regulated.
Subpart TTT	Primary lead smelting	The facility is not the type of source regulated.
Subpart UUU	Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units at Petroleum Refineries	The facility is not the type of source regulated.
Subpart VVV	Major sources of hazardous air pollutants that are publicly owned treatment works	The facility is not the type of source regulated.
Subpart XXX	Ferroalloys production	The facility is not the type of source regulated.
Subpart CCCC	Manufacturing of nutritional yeast	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subpart GGGG	Solvent extraction for vegetable oil production	The facility is not the type of source regulated.
Subpart HHHH	Wet-formed fiberglass mat production	The facility is not the type of source regulated.
Subpart TTTT	Leather finishing operations	The facility is not the type of source regulated.
Subpart VVVV	Boat manufacturing	The facility is not the type of source regulated.
Subpart XXXX	Rubber tire manufacturing facility	The facility is not the type of source regulated.
Subpart QQQQ	Friction materials manufacturing facility	The facility is not the type of source regulated.

17PS. 40 CFR Part 64 – Compliance Assurance Monitoring - [40 CFR Part 64, 2002]

Findings: This part applies to certain emission units that have pre-controlled emissions above the major source thresholds and utilize air pollution control equipment to control emissions. GTN does not utilize air pollution control equipment, so Part 64 does not apply.

18PS. 40 CFR Part 68 - Chemical Accident Prevention Provisions - [40 CFR Part 68, 1996]

Findings: This part sets forth requirements for the prevention of accidental releases for owners or operators of stationary sources (as defined in the rule) that have more than a threshold quantity of a regulated substance. GTN is not a stationary source as defined in the rule.

19PS. 40 CFR Part 72 - Permits Regulation - [40 CFR Part 72, 2002]

Findings: This rule implements the federal Acid Rain Program which applies to affect units as defined in the rule. GTN does not operate any affected units at the site.

20PS. 40 CFR Part 75 - Continuous Emission Monitoring - [40 CFR Part 75, 2002]

Findings: This rule establishes the requirements for continuous emission monitoring for affected units under the Acid Rain Program. GTN does not have any affected units at the site.

21PS. 40 CFR Part 76 - Acid Rain Nitrogen Oxides Emission Reduction Program - [40 CFR Part 76, 2002]

Findings: This rule establishes requirements for certain coal-fired utility units, coal-fired substitution units and compensating units, and coal-fired transfer units. GTN does not have any of these units at this site.

22PS. 40 CFR Part 77 - Excess Emissions - [40 CFR Part 77, 2002]

Findings: This part sets forth the excess emissions offset planning and offset penalty requirements for owners and operators of affected units under the Acid Rain Program. GTN does not have any affected units at this site.

23PS. 40 CFR Parts 79 and 80 - [40 CFR Part 79 and 80, 2002]

Findings: Parts 79 and 80 apply to the registration and regulation of fuels and fuel additives. GTN does not engage in any activities that would trigger these regulations, so they do not apply.

24PS. 40 CFR Part 82 - Protection of Stratospheric Ozone As Listed in Table III.A-3 - [40 CFR Part 82, Subparts as listed in Table III.A-3, 2002]

Findings: Table III.A-3 lists subparts of 40 CFR Part 82 for which a shield is granted. A summary of the reason the shield is granted is also provided.

Table III.A-3

SUBPART OF 40 CFR PART 82	APPLICABILITY	FINDINGS
Subpart A	Persons who produce, transform, destroy, or export controlled substances or import a controlled product.	The facility does not participate in any of the regulated activities.
Subpart B	Persons performing service on a motor vehicle involving refrigerant in the vehicle's air conditioner.	The facility does not participate in any of the regulated activities.
Subpart C	Persons selling, distributing, or offering to sell or distribute, in interstate commerce certain products.	The facility does not participate in any of the regulated activities.
Subpart D	Departments, agencies, and instrumentalities of the United States.	The facility is not a department, agency, or instrumentality of the United States.
Subpart E	Manufacturers of products containing or manufactured with ozone depleting substances.	The facility does not participate in any of the regulated activities.

25PS. Incinerator Burning and Incinerator Hours - [SRCAA Regulation I, Section 6.03, 3/4/04]

Findings: This regulation applies to incinerators operated within Spokane County. Since GTN does not operate any incinerators, this regulation does not apply.

26PS. Agricultural Burning - [SRCAA Regulation I, Section 6.11, 5/3/07]

Findings: This regulation applies to agricultural burning in Spokane County. Since GTN does not engage in agricultural burning, this regulation does not apply.

27PS. General Surface Coating - [SRCAA Regulation I, Section 6.13, 3/4/04]

Findings: SRCAA Regulation I, Section 6.13 establishes requirements for sources that perform surface coating. Since GTN does not perform surface coating, this regulation does not apply.

28PS. Standards for Control of Particulate Matter on Paved and Unpaved Roads - [SRCAA Regulation I, Sections 6.14 & 6.15, 5/3/07]

Findings: SRCAA Regulation I, Section 6.14 apply to applies to any state, county, city or local government or private company that applies sanding materials to or mechanically sweeps or vacuums paved surfaces within the PM10 nonattainment area or within the PM10 maintenance area after the nonattainment area is redesignated to attainment. It also applies to all suppliers of sanding materials to be used by the affected entities. SRCAA Regulation I, Section 6.15 applies to governmental entities responsible for the maintenance of unpaved roads within the PM10 nonattainment area. Since Station 6 is not located within the PM10 maintenance area and there are no nonattainment areas in Spokane County, these regulations do not apply.

29PS. Solid Fuel Burning Device Standards - [SRCAA Regulation I, Article VIII, 9/6/07]

Findings: SRCAA Regulation I, Article VIII establishes emission standards, certification standards and procedures, curtailment rules, and fuel restrictions for solid fuel burning devices in order to attain the National Ambient Air Quality Standards for fine particulate matter (PM<sub>10</sub>). Solid fuels (i.e. wood, coal, or any other nongaseous or non-liquid fuels) are not burned at GTN Station 6. Therefore, this regulation does not apply

30PS. Solid Fuel Burning Device Exemption and Oxygenated Gasoline Fees - [SRCAA Regulation I, Sections 10.10 & 10.11, 3/4/04]

Findings: SRCAA Regulation I, Sections 10.10 & 10.11 contain fee schedules for solid fuel burning device exemptions and oxygenated gasoline blenders in Spokane County. Since GTN does not operate any solid fuel burning devices and do not blend gasoline, these regulations do not apply.

## **Requirements For Which a Shield Will Not Be Granted**

[WAC 173-400-010, WAC 173-400-020, WAC 173-400-030, WAC 173-400-045, WAC 173-400-081, WAC 173-400-091, WAC 173-400-116, WAC 173-400-120, WAC 173-400-131, WAC 173-400-136, WAC 173-400-161, WAC 173-400-171, WAC 173-400-180, WAC 173-400-190, WAC 173-400-210, WAC 173-400-220, WAC 173-400-230, WAC 173-400-240, WAC 173-400-250, WAC 173-400-260, Chapter 173-450 WAC, Chapter 173-481 WAC, Chapter 173-495 WAC, 40 CFR Part 50, 40 CFR Part 51, 40 CFR Part 53, 40 CFR Part 62, 40 CFR Part 65, 40 CFR Part 66, 40 CFR Part 67, 40 CFR Part 69, 40 CFR Part 78, 40 CFR Part 81, 40 CFR Part 93, 40 CFR Part 95, 40 CFR Part 96, 40 CFR Part 97, SRCAA Regulation I, Section 1.01, SRCAA Regulation I, Section 1.02, SRCAA Regulation I, Section 1.03, SRCAA Regulation I, Section 1.04, SRCAA Regulation I, Section 4.03, SRCAA Regulation I, Section 6.09, SRCAA Regulation I, Section 10.01, SRCAA Regulation I, Section 10.03, SRCAA Regulation I, Section 10.04]

Findings: The regulations listed above do not contain any requirements (i.e., emission limitations; monitoring, recordkeeping, reporting requirements, etc.) that would be applicable to a major source. Therefore, a permit shield for the above listed regulations is not appropriate.

[Chapter 173-420 WAC, Chapter 173-421 WAC, Chapter 173-422 WAC, 40 CFR Part 82, 40 CFR Part 85, 40 CFR Part 86, 40 CFR Part 87, 40 CFR Part 88, 40 CFR Part 89, 40 CFR Part 90, 40 CFR Part 91, 40 CFR Part 92] [40 CFR Part 94]

Findings: The regulations listed above apply to mobile sources of air pollution. Mobile sources are not considered part of the definition of "major source" under Chapter 173-401 WAC. Therefore, a permit shield for the above listed regulations is not appropriate.

[WAC 173-400-060]

Findings: WAC 173-400-060 contains a 0.1 gr/dscf grain loading limit that all general process units are required to meet. WAC 173-400-060 applies to all emission units at the facility and is contained in Condition 56 of this permit. Therefore, SRCAA cannot grant a permit shield for this requirement.

[WAC 173-400-105]

Findings: WAC 173-400-105 contains requirements related to records, monitoring, and reporting. WAC 173-400-105(1) requires that an annual emission inventory be submitted to SRCAA and is contained in Condition 29 of this permit. Therefore, SRCAA cannot grant a permit shield for this requirement.

[WAC 173-400-107]

Findings: WAC 173-400-107 contains provisions and criteria related to unavoidable excess emissions. The provisions of WAC 173-400-107 are contained in Condition 20 of this permit. Therefore, SRCAA cannot grant a permit shield for this requirement.

[WAC 173-400-110, 112, 113, 114, and 141] [Chapter 173-460 WAC] [SRCAA Regulation I, Article V]

Findings: WAC 173-400-110, 112, 113, 114, & 141, Chapter 173-460 WAC, and SRCAA Regulation I, Article V contain new source review requirements. Prior to the establishment of a new source, including modifications, the permittee may be required to file for and obtain approval under SRCAA's Notice of Construction program. The requirements of WAC 173-400-110, 112, 113, & 114, Chapter 173-460 WAC, and SRCAA Regulation I, Article V are contained in Conditions 41 and 42 of this permit and are applicable when triggered. Therefore, SRCAA cannot grant a shield for these requirements.

[Chapter 173-401 WAC]

Findings: The provisions in Chapter 173-401 WAC establish the elements of the comprehensive Washington state air operating permit program consistent with the requirements of Title V of the Federal Clean Air Act. Chapter 173-401 WAC does not impose substantive new requirements. Since Chapter 173-401 WAC outlines the state air operating permit program and does not impose substantive new requirements, a permit shield is not appropriate for any requirement under this Chapter.

[Chapter 173-491 WAC]

Findings: Chapter 173-491 WAC applies to gasoline marketing operations, including the storage, transport, and transfer of gasoline, including the transfer from storage tanks into transport tanks, and from storage tanks into motor vehicles. GTN operates several gasoline storage tanks at the facility. Under Chapter 173-491, there are no vapor recovery requirements for existing gasoline tanks until the annual throughput exceeds 360,000 gallons. The annual gasoline throughput at GTN has been well below 360,000 gallons. However, since the vapor recovery requirements could be triggered in the future, SRCAA cannot grant a permit shield for Chapter 173-491 WAC.

[40 CFR Part 71]

Findings: 40 CFR Part 71 contains the federal air operating permit program. Currently, Washington state has a delegated air operating permit program, which operates under the provisions of Chapter 173-401 WAC. However, according to 40 CFR 71.4, EPA will administer and enforce an operating permits program for a permitting authority if EPA determines that a

permitting authority is not adequately administering or enforcing its approved operating permits program, or any portion thereof, and the permitting authority fails to do either of the following: (i) Correct the deficiencies within 18 months after the Administrator issues the notice; or (ii) Take significant action to assure adequate administration and enforcement of the program within 90 days of the EPA notice. Although Part 71 is not applicable currently, it could potentially become effective during the term of the permit. Therefore, SRCAA cannot grant a permit shield for 40 CFR Part 71.

[SRCAA Regulation I, Article II]

Findings: SRCAA Regulation I, Article II contains general provisions that apply to all sources in Spokane County. Many of the general provisions are contained or cited in the Standard Terms & Conditions section of the permit (e.g., Conditions 17, 18, 21). Therefore, a permit shield from the provisions of SRCAA Regulation I, Article II is not appropriate.

[SRCAA Regulation I, Article IX]

Findings: SRCAA Regulation I, Article IX contains requirements to control asbestos emissions from asbestos removal and demolition projects. While GTN does not use asbestos in the process or equipment, there may be asbestos in any of the buildings on-site. If GTN does any demolition or renovation projects at the facility, the requirements of SRCAA Regulation I, Article IX will be triggered. SRCAA cannot grant a permit shield for this requirement. The requirements of SRCAA Regulation I, Article IX are contained in Condition 43 of this permit and are applicable when triggered.

[SRCAA Regulation I, Sections 10.07 and 10.09]

Findings: SRCAA Regulation I, Section 10.07 and 10.09 contain fee schedules for Notices of Construction and Asbestos project. Since the new source review program and Asbestos requirements are applicable when triggered, SRCAA cannot grant a permit shield for the fee regulations pertaining to these programs.

PREPARED BY: \_\_\_\_\_  
April Westby

DATE: \_\_\_\_\_

This Statement of Basis and the Operating Permit to which it applies have been reviewed by:

\_\_\_\_\_, P.E.  
April Westby, P.E.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Ronald J. Edgar, Chief of Technical Services

DATE: \_\_\_\_\_

\_\_\_\_\_  
William Dameworth, Control Officer

DATE: \_\_\_\_\_