



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

March 17, 2003

CERTIFIED MAIL No. 7000 1530 0005 5348 6421

Jim Robbins
Environmental Specialist
Chevron Pipe Line Co.
651 S. Redwood Road
North Salt Lake, UT 84054-2925

RE: AIRs Facility No. 001-00026, Chevron Pipeline Co., Boise
Final Permit Letter

Dear Mr. Robbins:

The Idaho Department of Environmental Quality (Department) is issuing modified Permit to Construct Number P-020015 for Chevron Pipeline Co. (CPL), in accordance with IDAPA 58.01.01.200 through 223 *Rules for the Control of Air Pollution in Idaho*. This permit is effective immediately and is based on your permit application received on May 3, 2002.

This permit does not release CPL from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Tom Krinke of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Before you begin operating your equipment in accordance with this permit you must first submit an application to administratively amend your Tier I operating permit in accordance with IDAPA 58.01.01.209.05.c. You may begin operations upon submission of the application.

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. E. West".

Stephen E. West, Administrator
Air Quality Division

SW/DH/sm

Enclosures

C: Mike McGown, Regional Office
Dustin Holloway, AQ
Pat Rayne, AFS
Marilyn Seymore, AQ
Bill Rogers, Permit Coordinator
Laurie Kral, EPA Region 10
Sherry Davis, AQ Division/SF
Reading File

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AIRS	<i>Aerometric Information Retrieval System</i>
AQCR	Air Quality Control Region
BTEX	Benzene, Toluene, Ethylbenzenes, and Xylenes
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
O&M	operations and maintenance
PM	particulate matter
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-020015

Permittee: Location:	Chevron Pipe Line Co. / Northwest Terminalling Co. 201 N. Phillippi St., Boise, Idaho	AIRS Facility No. 001-00026	Date Issued:	March 17, 2003
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PERMIT TO CONSTRUCT SCOPE

Purpose

This permit to construct (PTC) incorporates the following permit:

- PTC No. 001-00026, issued August 28, 1990

Regulated Sources

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

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Section	Source Description	Emissions Controls
2	Soil vapor extraction system	Vapor incinerator

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2. VAPOR INCINERATOR

Emission Limits

2.1 Vapor Incinerator Stack

Vapor incinerator stack emissions of benzene shall not exceed 0.054 lb/hr and 0.24 T/yr.

2.2 Particulate Emissions

Emissions of particulate matter (PM) from the vapor incinerator stack shall not exceed 0.015 gr/dscf corrected to 3% oxygen in accordance with IDAPA 58.01.01.677.

Operating Requirements

2.3 Operations and Maintenance Manual Requirements

Within 60 days after permit issuance, the permittee shall have developed an operations and maintenance (O&M) manual for the vapor incinerator which describes the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the vapor incinerator. This manual shall contain, at a minimum, the operating temperature range, allowable flow rates, allowable inlet concentrations, and manufacturer specifications for the vapor incinerator. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.

2.4 Operating Temperature

The vapor incinerator operating temperature shall be above 1200°F.

2.5 Automatic Shutoff for Pilot Burner

The permittee shall install, calibrate, maintain, and operate a system to automatically shut off the bioventing feed line to the vapor incinerator in the event of a pilot burner failure.

2.6 Automatic Shutoff for Operating Temperature

The permittee shall install, calibrate, maintain, and operate a system to automatically shut off the bioventing feed line to the vapor incinerator whenever the vapor incinerator operating temperature is below 1200°F.

Monitoring Requirements

2.7 Gas-Chromatographic Analyses

The permittee shall collect sets of samples from the influent stream of the incinerator and conduct gas-chromatographic analyses. The samples are required to be collected no later than 10 days after initial start-up. Sampling must be conducted once within three months of the previous sampling during vapor incinerator operation. Each set of samples shall consist of at least two vapor incinerator influent samples. The following information shall be recorded for each sample during the sampling:

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- The date and time of each sample collection
- The volumetric flow rate in standard cubic feet per minute from the bioventing wells
- The volumetric flow rate in standard cubic feet per minute of the P-100 pump suction line downstream of the dilution air inlet
- The volumetric flow rate in standard cubic feet per minute of the P-101 pump suction line downstream of the dilution air inlet
- The vapor incinerator operating temperature

2.8 **Benzene Emissions**

The results of the sample collection and subsequent gas-chromatographic analyses required in Permit Condition 2.7 shall be recorded. The records of the results shall contain all of the information required in Permit Condition 2.7 and the concentration of BTEX in the sample. If the BTEX concentration is below the detection limit, indicate so and report the detection limit.

The permittee shall calculate the benzene emission rate using the following method. The permittee shall calculate the mass flow of benzene into the vapor incinerator using the gas-chromatographic analyses results and the volumetric flow rate determined during sampling. The destruction efficiency of the vapor incinerator shall then be used to calculate the pound-per-hour benzene emissions rate from the vapor incinerator.

A compilation of the most recent two years of samples and emissions calculations shall be kept onsite and shall be made available to Department representatives upon request.

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3. VAPOR INCINERATOR BYPASS

3.1 Bypass Restriction

The bioventing well and blower system shall not be operated so as to bypass or otherwise circumvent the vapor incinerator without prior Department approval. Once influent concentrations of BTEX are low enough to qualify for a PTC exemption, the permittee may submit an analysis to the Department showing that the soil vapor extraction system meets the requirements in IDAPA 58.01.01.220 for an exemption. After the Department reviews the analyses and concurs that the project is exempt from PTC requirements, the permittee may remove the vapor incinerator. All of the operating, monitoring, and record-keeping requirements for the vapor incinerator in Permit Condition 2 are not required after the permittee has shown to the Department's satisfaction that the system is exempt from PTC requirements.

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4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq., and the permittee is subject to penalties for each day of noncompliance.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must **strictly adhere to the** procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

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The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any compliance test period, for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to the department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.