

June 14, 2000

MEMORANDUM

TO: Gwen P. Fransen, Regional Administrator
Coeur D'Alene Regional Office

FROM: Bill Rogers, Air Quality Engineer 
State Technical Services Office

SUBJECT: **PERMIT TO CONSTRUCT TECHNICAL ANALYSIS**
P-000108, PG&E Gas Transmission - Northwest, Athol
(Permit to Construct Amendment, PTC No. 055-00033)

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*) for issuing Permits to Construct (PTC).

PROJECT DESCRIPTION

On July 31, 1998, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ), requested in writing that PG&E Gas Transmission - Northwest (PG&E GT-NW) update their three, 1995, Title V Operating Permit (OP) applications due to changes in the *Rules* that may have affected the facilities. The request also asked that the OP applications be updated by addressing all PTC's issued since submittal of the 1995 OP applications.

As part of the submitted updates, PG&E GT-NW included changes they want to make to their existing PTC's before any OP is drafted. This permitting action addresses only those changes requested for PG&E GT-NW's Compressor Station #5 located near Athol, Idaho.

SUMMARY OF EVENTS

On July 31, 1998, DEQ requested that PG&E GT-NW update their three, 1995, Title V OP applications. The updates for the Eastport facility were received on August 31, 1998.

DISCUSSION

1. Area Classification

This facility is located near Athol, Idaho, which is located in north central Kootenia County. The area is designated as an attainment or unclassifiable area for all criteria air pollutants. Kootenia County is located in Air Quality Control Region (AQCR) 62 and Zone 11.

2. Facility Classification

This facility is a major facility as defined in IDAPA 16.01.01.006.55, but it is not a PSD major facility. The facility is not a designated facility according to IDAPA 16.01.01.006.27. The facility is subject to federal New Source Performance Standards (NSPS) in accordance with 40 CFR 60, Subpart GG, because the affected turbine has a heat input greater than 10.7 gigajoules per hour (10 MMBtu/hr) and was constructed, modified, or reconstructed after October 3, 1977. The SIC code defining the facility is 4922, and the facility is classified as A1.

3. Process Description

PG&E GT-NW operates a network of compressor stations that transmit natural gas from Canada to California along an underground pipeline system. The pipeline enters the United States in northern Idaho, continues through southeastern Washington and central Oregon, and enters California at its

northern border. Each compressor station consists of one or more turbine-driven compressors that move the natural gas through the pipeline. The turbines use the natural gas in the pipeline as fuel and provide energy for the compressors to induce the flow of the gas.

Compressor Station # 5 currently uses two turbine-driven compressors. The turbines are referenced as Unit 5B and Unit 5C. Unit 5B is a Cooper Rolls Coberra 125 gas turbine which has been in operation since 1970. Based on review of the facility's source file, it appears that Unit 5B has not been modified since its construction. Consequently, Unit 5B is not subject to NSR/PSD permit requirements. Unit 5B has a rated output capacity of 16,500 hp (ISO). Unit 5C is a Cooper Rolls Coberra 6000 gas turbine which was constructed in 1992. The PTC issued for Unit 5C was most recently amended in 1997. Unit 5C has a rated output capacity of 35,000 hp (ISO).

4. Equipment Listing

This analysis assumes Unit 3B has the following parameters:

Stack Height (ft):	42.0
Stack Diameter (ft):	9.6
Exhaust Gas Flowrate (acfm):	375,000 (average)
Exhaust Gas Temperature (°F):	900 (average)

5. Emission Estimates

This section discusses the proposed changes requested by the applicant. A spreadsheet was developed using permitted operating parameters to verify the emissions and associated ambient impacts from Unit 5C. The spreadsheet is incorporated as Appendix A of this document.

5.1 Short-term Emission Rate Limits

The applicant requests that the allowable short-term emission rate limits be changed from pound-per-hour (lb/hr) limits to ton-per-month (T/mo) limits. As a point of reference, Table 1 lists the allowable emission rates as they appear in the currently effective permit.

Table 1. Current Allowable Emission Rates - Unit 5C

SOURCE DESCRIPTION	PM		PM-10		CO		VOC		NOx	SO2	
	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr	lb/hr	t/yr	t/yr	lb/hr	t/yr
Turbine with permanent DLE combustor	1.2	5.3	1.2	5.3	114	143	0.7	2.9	197	0.34	1.5

Per current policy, the only time short-term (eg. lb/hr, lb/day) limits are required in a permit is to protect a short-term ambient standard, or to protect an NSPS or NESHAP standard, or a toxic air pollutant increment. Otherwise, short-term limits are to be documented in the technical memorandum for emissions inventory purposes. Inclusion of an unnecessary short-term limit in a permit presents the potential for noncompliance. For example, a hypothetical permit contains a short-term limit of 5 lb/hr but tests at 6 lb/hr. Modeling, however, indicates the source could operate at 15 lb/hr without exceeding the standard. The source could be called out of compliance for exceeding the 5 lb/hr limit, but in reality, no ambient standard has been exceeded. The violation is simply a "paper violation" upon which the source would have to get their permit modified to increase the short-term limit.

To prevent this scenario from occurring, current policy is to include only the most limiting pollutant in a permit. The most limiting pollutant is normally the pollutant emitted in the largest quantity given the sources current operating conditions. This pollutant can be limited on a pound-per-hour, ton-per-year basis, but that depends entirely on the modeling analysis. Oftentimes, the most limiting pollutant is only limited on a ton-per-year basis. Compliance or non-compliance with the emission rate limit(s) is demonstrated by monitoring and recording a surrogate parameter, such as throughput, operating hours, pressure drop, etc., on a regular frequency. Assuming the surrogate is limited in the permit which is typical, all other pollutants emitted by the source are considered to be "inherently limited." They are inherently limited because the limit placed on the surrogate precludes them from being emitted at higher rate. And because they do not exceed any applicable standard, they are not put in the permit but are documented in the technical memorandum for emission inventory purposes.

Table 2 presents the emission inventory for Unit 5C. As can be seen, NOx is the most limiting pollutant. Modeling indicates that short-term limits are not required to protect any air quality standard, ambient or otherwise, for any pollutant. This being the case, only NOx needs to be specifically limited in the permit, and only as an annual limit. The surrogate parameter chosen as a means to demonstrate compliance with the emission limit is fuel throughput. The current permit limits fuel throughput for Unit 5C to 2,627 million standard cubic feet per year (MMscf/yr). This value is retained in the amended permit issued for this permitting action.

Table 2. Emission Inventory - Unit 5C

SOURCE DESCRIPTION	NOx		PM-10		CO		VOC		SO2	
	lb/hr	T/yr								
Unit 5C	44.98	197	1.3	5.7	32.60	143	0.70	3.07	0.87	3.81

In summary, short-term emission rate (lb/hr or lb/mo) limits do not have to be included in the permit because modeling indicates that no ambient standard will be exceeded based on the current permit limits. No other standard applies that requires a short-term limit. NOx is the most limiting pollutant and is the pollutant included in the permit. NOx is limited to 197 T/yr. All other pollutants are inherently limited and their respective emissions are inventoried in Table 2.

5.2 SO2 Emissions

The applicant requests that the SO2 T/yr limit be revised (amended) from 1.5 T/yr to 3.8 T/yr. SO2 emissions are calculated based on a factor of 2.9 lb/MMscf of fuel. Using the allowable fuel throughput of 2,627 MMscf/yr, SO2 emissions could be calculated to 3.8 T/yr.

The emission factor used to calculate SO2 emissions is based on a fuel sulfur limit imposed by the state of California. That limit is one (1) grain of sulfur per 100 standard cubic feet of natural gas. Because California is the end user of the Canadian-supplied natural gas, the Canadian gas producers meet the fuel sulfur requirement before the gas enters the United States. The imposed limit equates to an emission factor of 2.9 lb SO2/MMscf of natural gas¹.

¹ (1 gr/100 scf)*(1 lb/7000 gr)*(1E6 scf/MMscf) = 1.43 lb/MMscf. Mol. wt. of sulfur is 32 lb/lbmol. Mol. wt. of SO2 is 64 lb/lbmol. Therefore, SO2 emission factor = (64/32)*1.43 lb/MMscf = 2.86 lb/MMscf or 2.9 lb/MMscf.

Multiplying the SO₂ emission factor by the allowable fuel throughput limit yields an SO₂ emission rate of 3.81 T/yr, not 1.5 T/yr. As shown in Table 2, this value is corrected in the emissions inventory for Unit 5C.

In addition, the applicant requests that the NSPS fuel sulfur requirement be changed from the permitted 150 ppm SO₂ option to the 0.8 weight percent sulfur option. The NSPS allows for either option to be chosen. The request is made because EPA has granted approval to the applicant for a custom fuel monitoring schedule for fuel sulfur content as allowed by the NSPS.

5.3 PM-10 Emissions

While calculated PM-10 totals come to about 3.0 T/yr (see Appendix A), PG&E GT-NW wishes to retain the current permit limit of 5.7 T/yr. The proposed AP-42 section for gas turbines appears to indicate a higher PM potential and therefore PG&E GT-NW wishes to retain the higher number for permit purposes.

PM-10 is inherently limited by the limit placed on fuel throughput. However, an ambient assessment was conducted to assure NAAQS compliance at the higher PM-10 emission rate. The analysis indicates that PM-10 emissions will not exceed any applicable ambient air quality standard. Furthermore, there are no other regulatory standards that preclude the source from emitting at the higher rate. Because PM-10 is inherently limited, it is not included in the amended permit. The higher value is however retained in the emission inventory as requested.

5.4 NO_x Emission Factor

Condition 3.3 of permit 055-00033 specifies an emission factor of 0.15 lb/mscf, while condition 4.3 specifies an annual limit of 2,627 MMscf/yr. Rather than specify these as absolute permit limits, PG&E GT-NW is requesting that it be allowed to use these parameter thresholds for monitoring purposes.

PG&E GT-NW does not wish to consider a fuel consumption level and a NO_x to fuel relationship as applicable requirements under the Federal Clean Air Act. Rather PG&E GT-NW will use a fuel-based emission factor to monitor compliance with the NO_x permit limit. It is possible that the manufacturer could develop and implement systems that improve fuel efficiency, in which the emission factor may be higher than 0.15 lb/mscf while the fuel consumption rate will be lower. . . . Rather than list an emission factor and a fuel rate as applicable requirements, PG&E GT-NW wishes to establish 2,627 million scf/year as a fuel rate threshold below which it will be deemed to be in compliance with the NO_x limit given the existing setup. . . .

The NO_x emission factor for Unit 3B is based on the results of prior source tests conducted at full-load conditions. This emission factor is specific to Unit 5C. Using the emissions factor, the applicant arrived at a fuel throughput level that they feel satisfies their needs for Unit 5C. Because the applicant tracks fuel usage on a monthly basis, it makes sense to use throughput as the surrogate parameter for compliance purposes for NO_x emissions. Section 3.3 requires a source test in order to verify the NO_x emission factor. This requirement is relevant due to the relationship between the NO_x fuel factor and fuel throughput, however, the requirement is better off handled in the Title V OP process. Therefore, Section 3.3 of the February 21, 1997 permit is not included in this amended permit.

6. Modeling

The EPA approved SCREEN3 model was used to assess the ambient impacts from Unit 5C. The results of the modeling analysis indicate that emissions from Unit 5C will not cause or contribute to a violation of any applicable ambient air quality standard. The SCREEN3 output is presented as Appendix B of this document. The modeling analysis is presented as Appendix A.

7. Regulatory Review

7.1 IDAPA 16.01.01.201 PTC Required

A PTC is required for this amendment because it does not meet the exemption requirements specified in IDAPA 16.01.01.220 through .223.

7.2 IDAPA 16.01.01.210 Demonstration of Preconstruction Compliance with Toxic Standards

Compliance with toxic standards has been demonstrated.

7.3 IDAPA 16.01.01.577 Ambient Air Quality Standards for Specific Air Pollutants

Compliance with the NAAQS has been demonstrated.

7.4 Prevention of Significant Deterioration

Not applicable.

7.5 New Source Performance Standards 40 CFR 60

This facility is subject to federal regulation in accordance with 40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines).

7.6 National Emission Standards for Hazardous Air Pollutants 40 CFR 61

Not applicable.

7.7 Maximum Achievable Control Technology Standards 40 CFR 63

Not applicable.

8. Permit Requirements

8.1 Emission Limits

8.1.1 NO_x Emissions - Unit 5C

NO_x emissions limited to 42 ppmvd @ 15% oxygen as part of a previous BACT determination. NO_x annual emission limited to 197 T/yr.

8.2 Operating Requirements

8.2.1 Fuel Throughput - Unit 5C

Natural gas throughput is limited to 2,627 MMscf/yr to demonstrate compliance with the 197 T/yr NO_x emission rate limit.

8.3 Monitoring Requirements

8.3.1 Fuel Throughput

Requirement is to monitor and record the throughput of natural gas to Units 5C to demonstrate compliance with the fuel throughput limit.

8.4 Reporting Requirements

8.4.1 Excess Emission Report

Required by federal mandate.

9. Permit Coordination

9.1 State Air Program

This document will be routed internally to be added to the Title V operating permit materials.

10. AIRS

The AIRS forms applicable to this permitting action are presented as Appendix C of this document.

11. Fees

This facility is a major facility as defined by IDAPA 16.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 16.01.01.525. According to the Air Emissions Database Master list for 2000, this facility has registered 174.6 tons by paying fees in accordance with IDAPA 16.01.01.527. This amendment does not affect registration or registration fees.

RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that the PG&E Gas Transmission Northwest be issued amended PTC No. 055-00033 for their Compressor Station #5 located near Athol, Idaho. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD Permit to Construct requirements.

BR/hs 81508 G:\AHW\ROGERS\PTC\PG&E\ATHOL\000108.TM

cc: DEQ State Office
Coeur d'Alene Regional Office
EPA Region X

APPENDIX A

*Emissions Spreadsheet
Compressor Station #5
Athol*

*PG&E Gas Transmission - Northwest
P000108
June 2000*

PG&E GT-NW										
Compressor Station #5 - Unit 5C										
June 2000										
EMISSION ESTIMATES										
POLLUTANT	ANNUAL	EMISSION	EMISSION	EMISSION	EMISSION	EMISSION	SCREEN3 1-HR			
	THROUGHPUT	FACTOR	FACTOR	FACTOR	RATE	RATE	IMPACT			
	MMscf/yr	lb/MMscf	lb/hr	lb/Mscf	lb/hr	T/yr	ug/m3			
PM-10	2627	2.29	-----	-----	0.69	3.01	0.1327			
SO2	2627	2.9	-----	-----	0.87	3.81	0.1327			
CO	2627	-----	32.6	-----	32.60	142.79	0.1327			
NOx	2627	-----	-----	0.15	44.98	197.03	0.1327			
VOC	2627	-----	0.7	-----	0.70	3.07	0.1327			
MODELING ANALYSIS										
PREDICTED IMPACT PER AVERAGING TIME						STATE-WIDE BACKGROUND CONCENTRATIONS				
	1-HR AVE	3-HR AVE	8-HR AVE	24-HR AVE	ANNUAL	1-HR AVE	3-HR AVE	8-HR AVE	24-HR AVE	ANNUAL
	1	0.9	0.7	0.4	0.08	1	0.9	0.7	0.4	0.08
	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3
PM-10	---	---	---	0.036	0.007	---	---	---	86.0	32.7
SO2	---	0.104	---	0.046	0.009	---	543.0	---	144.0	23.5
CO	4.326	---	3.028	---	---	11450.0	---	515.0	---	---
NOx	---	---	---	---	0.478	---	---	---	---	40.0
VOC	0.093	---	---	---	---	0.0	---	---	---	---
PREDICTED IMPACT PLUS STATE-WIDE BACKGROUND CONCENTRATION										
	1-HR AVE	3-HR AVE	8-HR AVE	24-HR AVE	ANNUAL	NAAQS				
	1	0.9	0.7	0.4	0.08	1-HR AVE	3-HR AVE	8-HR AVE	24-HR AVE	ANNUAL
	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3	ug/m3
PM-10	---	---	---	86.036	32.707	---	---	---	150	50
SO2	---	543.104	---	144.046	23.509	---	1300	---	365	80
CO	11454.326	---	518.028	---	---	40000	---	10000	---	---
NOx	---	---	---	---	40.478	---	---	---	---	100
VOC	0.093	---	---	---	---	235	---	---	---	---

Applicant proposes to retain PM-10 limits of 1.2 lb/hr and 5.3 T/yr. To assure NAAQS compliance, the following is presented:

$$(0.064 \text{ ug/m}^3) + 86.0 \text{ ug/m}^3 = 86.064 \text{ ug/m}^3 < 150 \text{ ug/m}^3$$

$$(1.2 \text{ lb/hr} \times \frac{0.1327 \text{ ug/m}^3}{\text{lb/hr}}) (0.08) = 0.013 \text{ ug/m}^3, \text{ Annual Ave.}$$

$$(0.013 \text{ ug/m}^3) + 32.7 \text{ ug/m}^3 = 32.713 \text{ ug/m}^3 < 50 \text{ ug/m}^3$$

APPENDIX B

*SCREEN3 Output
Compressor Station #5
Athol*

*PG&E Gas Transmission - Northwest
P000108
June 2000*

06/08/00
13:56:50

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

000108 - PG&E GT-NW - Unit 5C, Athol

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	.126000
STACK HEIGHT (M)	=	12.8016
STK INSIDE DIAM (M)	=	2.9261
STK EXIT VELOCITY (M/S)	=	26.3186
STK GAS EXIT TEMP (K)	=	755.3722
AMBIENT AIR TEMP (K)	=	293.1500
RECEPTOR HEIGHT (M)	=	.0000
URBAN/RURAL OPTION	=	RURAL
BUILDING HEIGHT (M)	=	.0000
MIN HORIZ BLDG DIM (M)	=	.0000
MAX HORIZ BLDG DIM (M)	=	.0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BOUY. FLUX = 338.041 M**4/S**3; MOM. FLUX = 575.404 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	U5TK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
10.	.0000	1	1.0	1.0	1266.1	1265.07	14.91	14.61	NO
100.	.1306E-01	6	1.0	1.1	10000.0	177.04	47.10	46.98	NO
200.	.1338E-01	6	1.0	1.1	10000.0	177.04	47.56	47.10	NO
300.	.1378E-01	6	1.0	1.1	10000.0	177.04	48.25	47.26	NO
400.	.1425E-01	6	1.0	1.1	10000.0	177.04	49.15	47.45	NO
500.	.1479E-01	6	1.0	1.1	10000.0	177.04	50.25	47.67	NO
600.	.2125E-01	1	3.0	3.1	960.0	430.22	152.20	170.90	NO
700.	.5653E-01	1	3.0	3.1	960.0	430.22	173.10	228.63	NO
800.	.8004E-01	1	3.0	3.1	960.0	430.22	193.55	296.94	NO
900.	.1103	1	2.0	2.0	640.0	638.93	239.69	391.34	NO
1000.	.1295	1	2.0	2.0	640.0	638.93	260.86	480.07	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 10. M:

1070. .1327 1 2.0 2.0 640.0 638.93 275.25 547.70 NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** INVERSION BREAK-UP FUMIGATION CALC. ***
 CONC (UG/M**3) = .2032
 DIST TO MAX (M) = 13407.37

 *** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION MAX CONC DIST TO TERRAIN

Post-it* Fax Note	7671	Date	6/9	# of pages	15
To	Vonnie H., CRO	From	Hillary S.		
Co./Dept.		Co.	Strife Office		
Phone #		Phone #			
Fax #		Fax #			

COPS! Second half of PG 5E - Athol

PROCEDURE	(UG/M**3)	MAX (M)	HT (M)
SIMPLE TERRAIN	.1327	1070.	0.
INV BREAKUP FUMI	.2032	13407.	--

APPENDIX C

*AIRS Information
Compressor Station #5
Athol*

*PG&E Gas Transmission - Northwest
P000108
June 2000*

GENERAL REPORT INFORMATION:

USER ID: PRY
REPORT NAME: C-PG&E-A
FORMAT TYPE: SD
TITLE:

SELECTION CRITERIA:

REGN ME 10
SCSC ME 160550003

SOURCE DATA INCLUDES:

PLANT LEVEL
POINT LEVEL

WITH ACTIONS
WITH COMMENTS

SORTING ELEMENTS:

JCL PARAMETERS:

ACCOUNT CODE: YIDA
FIMAS ID: AFSCP 1 59
TIME (MIN,SEC): Z 2
PRIORITY CODE: Z 1
MESSAGE CLASS: 1
NUMBER OF COPIES: 1
FORM NUMBER: HWET
ROOM/BIN NUMBER: N
HOLDING OUTPUT?: N59.U1002
PRINTER SITE ID:
OUTPUT FILES:

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00033 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI AQCR: 062
GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

PLANT NAME: PG&E GAS TRANSMISSION-NORTHWEST
ADDRESS : 2.5 MI SW OF ATHOL
CITY, STATE: ATHOL, ID 83801
LAST PLANT UPDATE : 00/03/20
REGIONAL PLANNING :
LOCAL CONTROL REGN:
INSPECTOR :
MONITORING INFORMATION:
SOURCE: AMBIENT:

DUNN & BRADSTREET:
EPA ID NUMBER : IDD981768351

STANDARD INDUSTRIAL CLASSIFICATIONS:
4922 - NATURAL GAS TRANSMISSION
MAILING ADDRESS:
NAME : PG&E GAS TRANSMISSION-NORTHWEST
ADDRESS : 2100 SW RIVER PARKWAY
CITY, STATE: PORTLAND, OR 97201

HIGH PRIORITY VIOLATION: COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : - EPA
CLASSIFICATION: A
LAST INSPECT. : 94/05/24 TYPE: 17 : / / TYPE:

OPERATING STATUS: 0 - OPERATING
STATE REGISTRATION:
PLANT DESCRIPTION: NAT. GAS COMPRESSR STN #5
GOVT FAC.: 0 - ALL OTHER FACILITIES NOT
CAPACITY: 37500 HP PRIORITY :
COMPLIANCE CONTACT : STEVE WEBB , (503) 833-4000 GEMSS INFO (Y/N):

PLANT COMMENT:

INDIRECT COMMENT COMMENT
SOURCE # NO.
001 C UNIT C TURBINE WILL OPERATE W/TEMPORARY COMBUSTOR THROUGH
1994. THE UNIT C TEMPORARY COMBUSTOR SHALL BE REPLACED W/
DRY LOW NOX COMBUSTOR NO LATER THAN 12/20/96
002 C CO. NAME CHANGED FROM PACIFIC GAS TRANSMISSION CO. TO PG&E
GAS TRANSMISSION-NORTHWEST ON 1/1/98

AIR PROGRAM CODES:
V - TITLE V PE 0 - OPERATING
INSPECTIONS: STATE EPA

DATE: 06/07/00

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM

PLANT: 0003 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI ACQR: 062

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS: 0 - OPERATING
AFS PLANT ID:

EVEN YEAR : STRATEGY:
ODD YEAR : STRATEGY:
REPEAT VIOLATION FLAG/DATE:
TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION: -
STAFF: CDA - COEUR D'ALENE

FREQUENCY: FREQUENCY:
COMPLIANCE CLASSIFICATION: A
RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -

AIR PROGRAM POLLUTANTS:

FACIL -
LOADING: -
RDE14:
TOXICITY LEVEL:
STATE REGULATION NUMBER:

COMPLIANCE CLASSIFICATION: A
ATTAIN/NONATTN: -
STATE COMPLIANCE - INSPECTIO
EPA

AIR PROGRAM CODES:
0 - SIP
0 - OPERATING

INSPECTIONS:
EVEN YEAR : STRATEGY:
ODD YEAR : STRATEGY:
REPEAT VIOLATION FLAG/DATE:
TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION: -
STAFF: CDA - COEUR D'ALENE

FREQUENCY: FREQUENCY:
COMPLIANCE CLASSIFICATION: A
RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -

AIR PROGRAM POLLUTANTS:

PT - SUSPENDED PARTICULATE (TS)
LOADING: -
RDE14:
TOXICITY LEVEL:
STATE REGULATION NUMBER:

COMPLIANCE CLASSIFICATION: A
ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV
STATE COMPLIANCE - INSPECTIO
EPA

AIR PROGRAM CODES:
6 - PSD
0 - OPERATING

INSPECTIONS:
EVEN YEAR : STRATEGY:
ODD YEAR : STRATEGY:

FREQUENCY: FREQUENCY:
COMPLIANCE CLASSIFICATION: A
STATE COMPLIANCE - INSPECTIO
EPA

DATE: 06/07/00

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00033 - P&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: ATHOL
COUNTY: 055 - KOOTENAI AQCR: 062

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS: 0 - OPERATING
AFS PLANT ID:

REPEAT VIOLATION FLAG/DATE: 0
TURNOVER COMPLIANCE FLAG: -
REPORTING TO REGION: -
STAFF: CDA - COEUR D'ALENE

RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -

AIR PROGRAM POLLUTANTS:

PT - SUSPENDED PARTICULATE (TS)

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION: A
ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -
STATE EPA

PM10 - PM10 TOTAL 0-10UM

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION:
ATTAIN/NONATTN: -
STATE EPA

CO - CARBON MONOXIDE

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION:
ATTAIN/NONATTN: -
STATE EPA

VOC - VOLATILE ORG COMPNDS

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION: A
ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -
STATE EPA

NO2 - NITROGEN DIOXIDE

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION:
ATTAIN/NONATTN: -
STATE EPA

LOADING: -
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00033 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI AQCR: 062

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS : 0 - OPERATING

SO2 - SULFUR DIOXIDE

LOADING: -
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION: A
ATTAIN/NONATTN: A - ATTAINMENT AREA FOR A GIV : -

STATE-----EPA-----

AIR PROGRAM CODES: 0 - OPERATING

INSPECTIONS: 0 - OPERATING
EVEN YEAR : STRATEGY:
ODD YEAR : STRATEGY:
REPEAT VIOLATION FLAG/DATE:
TURNOVER COMPLIANCE FLAG: 0
REPORTING TO REGION: -
STAFF: CDA - COEUR D'ALENE

FREQUENCY: 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION:
RDE1: RDE2: RDE3: RDE4: RDE5: RDE6:
RDE7: RDE9: RDE10: RDE11: RDE12: RDE15:
STATE IMPLEMENTATION PLAN: -

STATE-----EPA-----

AIR PROGRAM POLLUTANTS:

NO2 - NITROGEN DIOXIDE

LOADING: -
RDE14 :
TOXICITY LEVEL:
STATE REGULATION NUMBER:

COMPLIANCE : 3 - IN COMPLIANCE - INSPECTIO : -
CLASSIFICATION:
ATTAIN/NONATTN: -

STATE-----EPA-----

ACT. NO.	INDIR. NO.	AIR PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY	RDB	PLLT/CASN	RDE
001	06	11	ID PTC ISSUED	92/03/20	92/03/20	08	ISSUED	0				16
COMMENT: COOPER-ROLLS COBERRA 6000 NAT. GAS FIRED TURBINE												
002	06	03	START CONST.	92/04/27	92/04/27	01	ACTION ACHIEVED	0				
003	06	04	END CONSTR.	99/01/01	/ /			0				

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM
STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00033 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI ACQR: 062
GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

ACT. NO.	INDIR. NO.	AIR PROGRAM	TYPE/DESCRIPTION	SCHEDULED DATE	ACT. DATE	STAFF	RESULTS	PENALTY	RDB	PILT/CASN	RDE
004	06	R 1	NEW SRCE START	92/12/20	92/12/20		01 ACTION ACHIEVED	0			16

COMMENT
NO.

001 PER 12/14/94 CO. LETTER-STARTUP OF UNIT C AT STATION 5

005 06 1 1 ID PTC ISSUED 92/10/07 92/10/07 08 ISSUED 0

COMMENT
NO.

001 AMENDED 3/20/92 PTC

007 06 1 8 SOURCE TST CON 93/06/08 93/06/08 19 IN COMPLIANCE 0

COMMENT
NO.

001 FUEL: NAT GAS (TO DRIVE COMPRESSOR) W/AIR
GEM RPT INCLUDED (CONDUCTED 6/7-8/93)
RESULTS: NO2 = 158.7 PH, ALLOWED 216 PH
CO = 14.1 PH, ALLOWED 114 PH
SO2 = LESS THAN 0.04 PH, ALLOWED 0.34 PH

008 069 85 SPEC ACT DUE/C 96/12/20 / /

COMMENT
NO.

001 35,000 HP TURBINE SHALL BE RETROFITTED W/DLN COMBUSTOR
DATE FOR INSTALLATION EXTENDED FROM 1/1/95 TO 12/20/96 WITH
1/2/95 PTC

009 06 1 7 ST COMP INSPEC 93/09/30 93/06/08 19 IN COMPLIANCE 0

COMMENT
NO.

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00033 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI AQCR: 062

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

ACT. NO.	INDIR. NO.	AIR PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY RD8	PLTT/CASN	RDE
010	06		17 ST COMP INSPEC	94/09/30	94/05/24		E34	19 IN COMPLIANCE	0		
011	06		85 SPEC ACT DUE/C	94/06/07	94/06/07			19 IN COMPLIANCE	0	A	
012	06		85 SPEC ACT DUE/C	95/06/30	/			02 NOT ACHIEVED	0		
013	06		85 SPEC ACT DUE/C	95/09/19	95/09/19			19 IN COMPLIANCE	0	A	

COMMENT NO. COMMENT

001 RESULTS "IN" PENDING SUCCESSFUL OUTCOME OF NOX STARTUP & RA TEST

COMMENT NO. COMMENT

001 FOLLOWUP ACTION REQ'D-VERIFICATION OF S.T. RESULTS TO VERIFY THAT NITROGEN OXIDE EMISSIONS MEET ACCEPTABLE LIMITS LISTED IN PTC

COMMENT NO. COMMENT

001 RATA ON NOX CCEMS CONDUCTED ON COMPRESSOR STN 5, UNIT C RESULTS REC'D 7/11/94

COMMENT NO. COMMENT

001 QTRLY RATA PER 6/2/95 DEQ LETTER-DEADLINE POSTPONED UNTIL 9/30/95

COMMENT NO. COMMENT

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00033 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI ACQR: 062

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS : 0 - OPERATING
AFS PLANT ID:

ACT. NO.	INDIR. NO.	AIR PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	ACT. CAT.	STAFF	RESULTS	PENALTY	RD8	PLTT/CASN	RDE
			001 002	1995 RATA FOR GCEMS COMPLIANCE TEST & MONITOR CERTIFICATION TESTING AT COMPRES-SOR STN 5, UNIT C								
			06	85 SPEC ACT DUE/C	96/09/11	96/09/11		19 IN COMPLIANCE	0			
			001	1996 NO2 GCEMS RATA - STATIONARY NAT GAS TURBINE COMPRESSOR STATION 5, UNIT C								
			069	1 1 ID PTC ISSUED	94/12/27	94/12/27		08 ISSUED	0			
			001	REVISION (REQUIRED INSTALLATION OF DLE COMBUSTOR ON UNIT C EXTENDED TO 12/20/96)								
			069	1 1 ID PTC ISSUED	97/02/21	97/02/21		08 ISSUED	0			
			001	AMENDMENT (MONITORING VIA FUEL CONSUMPTION)								
			069	1 8 SOURCE TST CON	99/01/01	/ /			0			

COMMENT NO.

1995 RATA FOR GCEMS COMPLIANCE TEST & MONITOR CERTIFICATION TESTING AT COMPRES-SOR STN 5, UNIT C

85 SPEC ACT DUE/C 96/09/11 96/09/11 19 IN COMPLIANCE 0

1996 NO2 GCEMS RATA - STATIONARY NAT GAS TURBINE COMPRESSOR STATION 5, UNIT C

1 1 ID PTC ISSUED 94/12/27 94/12/27 08 ISSUED 0

REVISION (REQUIRED INSTALLATION OF DLE COMBUSTOR ON UNIT C EXTENDED TO 12/20/96)

1 1 ID PTC ISSUED 97/02/21 97/02/21 08 ISSUED 0

AMENDMENT (MONITORING VIA FUEL CONSUMPTION)

1 8 SOURCE TST CON 99/01/01 / / 0

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM
STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00033 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI AQCR: 062
GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6.9
OPERATING STATUS: 0 - OPERATING
AFS PLANT ID:

POINT INFORMATION: / 020 M - NAT GAS COMBUSTOR-UNIT 5B

STATE SENSITIVE INDICATOR: STATE TYPE: EPA TYPE:
DESIGN CAPACITY: 12500 UNITS: 6 - HORSEPOWER LAST INSPECT. : / / : / /
CONTINUOUS EMISSIONS (Y/N): N SOOT BLOWING :
REGULATED SOURCE CLASS CODE: 10300601 TIMES PER DAY : 0 TIMES PER WEEK: 0 AM OR PM:
OPERATING RESTRICTIONS:

COMMENT COMMENT
NO.

001 C COOPER-ROLLS COBERRA 125
002 C STACK DATA: HEIGHT-29', DIAM-7'

AIR PROGRAM: 0 - SIP 0 - OPERATING
POLLUTANT-CODE: NO2 COMPLIANCE STATUS: 3 - IN COMPLIANCE - INSPECTIO :
STATE IMPLEMENTATION-PLAN: STATE EPA
RDEF: RDEF15:

POINT INFORMATION: / 030 M - TEMP. COMBUSTOR-UNIT 5C

STATE SENSITIVE INDICATOR: STATE TYPE: EPA TYPE:
DESIGN CAPACITY: 35000 UNITS: 6 - HORSEPOWER LAST INSPECT. : 93/06/08 TYPE: 18 : / /
CONTINUOUS EMISSIONS (Y/N): N SOOT BLOWING :
REGULATED SOURCE CLASS CODE: 10300601 TIMES PER DAY : 0 TIMES PER WEEK: 0 AM OR PM:
OPERATING RESTRICTIONS:

COMMENT COMMENT
NO.

011 C PER 6/8/93 INSPECTION-UNIT C BEGAN OPERATING 12/20/93
PER 12/14/94 CO. LETTER-STARTUP OF UNIT C STN 5 WAS 12/20/92
001 C COOPER-ROLLS COBERRA 6000
002 C CONTROLS: NONE

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM

STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 0003 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI AQCR: 062
POINT INFORMATION: / 030 M - TEMP. COMBUSTOR-UNIT 5C
GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9
OPERATING STATUS : 0 - OPERATING
AFS PLANT ID:

COMMENT COMMENT

003 C STACK DATA: HEIGHT-42', DIAM-11', ACFM-400,000, TEMP-850
DEG F
010 C DLE COMBUSTOR REQUIRED TO BE INSTALLED BY 12/20/96

AIR PROGRAM: 6 - PSD
POLLUTANT-CODE: NO2
T - TEMPORARILY CLOSED
COMPLIANCE STATUS: 3 - IN COMPLIANCE - INSPECTIO :
STATE-IMPLEMENTATION-PLAN: RDE7: RDE15:

AIR PROGRAM: 9 - NSPS
POLLUTANT-CODE: NO2
T - TEMPORARILY CLOSED
COMPLIANCE STATUS: 3 - IN COMPLIANCE - INSPECTIO :
STATE-IMPLEMENTATION-PLAN: RDE7: RDE15:

AIR PROGRAM: 0 - SIP
POLLUTANT-CODE: NO2
T - TEMPORARILY CLOSED
COMPLIANCE STATUS: 3 - IN COMPLIANCE - INSPECTIO :
STATE-IMPLEMENTATION-PLAN: RDE7: RDE15:

ACT. NO.	AIR PLANT PROGRAM	TYPE/DESCRIPTION	DATE SCHEDULED	DATE ACHIEVED	ACT. STAFF	RESULTS	PENALTY	RDB	PLLT/CASN	RDE
001	6	18 SOURCE TST CON	93/06/08	93/06/08		19 IN COMPLIANCE	0			16

COMMENT COMMENT

001 RESULTS: NO2 = 158.7 PH, ALLOWED 216 PH
CO = 14.1 PH, ALLOWED 114 PH
SO2 = LESS THAN 0.04 PH, ALLOWED 0.34 PH

POLLUTANT STATE REGULATION ALLOWABLE UNITS POT UNCTRL UNITS POT CNTRL UNITS ACTUAL UNCTRL UNITS/METHOD

PT 000001.2 PH
CO 0000114. PH
SO2 00000.34 PH

DATE: 06/07/00

AFS COMPLIANCE SOURCE DATA REPORT - HPV PROGRAM
STATE PRIVATE AND SENSITIVE AND DRAFT SIP DATA INCLUDED

PLANT: 00033 - PG&E GAS TRANSMISSION-NORTHWEST
STATE: ID/16 CITY: - ATHOL
COUNTY: 055 - KOOTENAI AQCR: 062
POINT INFORMATION: / 030 M - TEMP. COMBUSTOR-UNIT 5C

GOV'T FACILITY CODE: 0 - ALL OTHER FACILITIES NOT OWNED OR OPER.
AIR-PROGRAM CODE(S): V 0 6 9 AFS PLANT ID:
OPERATING STATUS : 0 - OPERATING

POLLUTANT	STATE REGULATION	ALLOWABLE UNITS	POT UNCTRL UNITS	POT CNTRL UNITS	ACTUAL UNCTRL UNITS/METHOD
VOC		000000.7			
PM10		990001.2			

only allowable in NOX = 197 T/yr.