

BENTON **CLEAN AIR AGENCY**

526 S. Clodfelter Rd. Kennewick, WA 99336

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Northwest Pipeline LLC Plymouth LNG Plant/ Compressor Station

WITH SECTION 70.94.161 RCW, Operating Permits for Air Contaminant Sources, and the applicable rules and regulations of the Benton Clean Air Agency

Air Operating Permit No. 04-01 Renewal 4

TO:

Northwest Pipeline LLC 295 Chipeta Way Salt Lake City, UT 84108 Issue Date:

14 August 2020

Effective Date: **Expiration Date:** 14 August 2020 14 August 2025

Responsible Official:

Director of Operations

Hereinafter, Northwest Pipeline LLC, Plymouth LNG Plant/Compressor Station is referred to as the permittee. The permittee is required to comply with he provisions contained within this permit.

Plant Site: 42612 E Christy Road, Plymouth, WA 99346

LEGAL AUTHORITY: This Air Operating Permit is issued under the authority and the provisions of the Federal Clean Air Act (FCAA, 42 U.S.C 7401, et seq), the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington (RCW), the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC), and the Benton Clean Air Agency Under 40 CFR 52.21

PREPARED BY:

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TABLE OF CONTENTS

	J.34 NEI	ral Clean Air Act (FCAA, 42 U.S.C 7401, et seq), the Washington Clean Air Act, vised Code of Washington (RCW), the Operating Permit Regulation, Chapter	172_401
W	ashingt/	on Administrative Code (WAC), and the Benton Clean Air Agency under 40 C	FR 52 21
LI	ST OF A	BBREVIATIONS	
1.	STAN	DARD TERMS & CONDITIONS	
	1.1.	Address of Record	***************************************
	1.2.	Duty to Supplement or Correct Application	*******************
	1.3.	Compliance Schedules	494944444444444444444
	1.4.	Permit Shield	******************
	1.5.	Reasonably Available Control Technology (RACT)	*****************
	1.6.	Record Keeping	
	1.7.	Reporting	
	1.8.	Duty to Comply	
	1.9.	Need to Halt or Reduce Activity not a Defense.	••••••••••••••••••
	1.10.	Permit Actions	
	1.11.	Property Rights	
	1.12.	Duty to Provide Information	
	1.13.	Permit Fees	5
	1.14.	Severability	
	1.15.	Permit Appeals	
	1.16.	Permit Continuation	د
	1.17.	Enforceability	0
	1.18.	Inspection and Entry	······································
	1.19.	Excess Emissions	ص
	1.20.	Operational Flexibility	
	1.21.	New Source Review	٥
	1.22.	Replacement or Substantial Alteration of Emission Control Technology	
	1.23.	Administrative Permit Amendments	9
	1.24.	Changes Not Requiring Permit Revisions	٠
	1.25.	Off-Permit Changes	44
	1.26.	Reopening for Cause	44
	1.27.	Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA	17
	1.28.	Demolition and Renovation (Asbestos)	12
	1.29.	Permit Renewal and Expiration	
	1.30.	General Obligation	1.1
	1.31.	Reporting of Emissions of Greenhouse Gases WAC 173-441	14
2.	SPECIF	C TERMS AND CONDITIONS	15
		ipeline Corporation, Plymouth LNG Plant/Compressor Station	

	Z.Z. PKUCE55 #Z: Saturn 10-11500 Naturai Gas Turbine	19
	2.3. PROCESS #3: Reciprocating Internal Combustion Engine (RICE) MACT Compliance (40 CFR	
	63 Sub part ZZZZ)	22
	2.4. PROCESS: #4: GTS Regeneration Process Heater	25
3.	MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (MRRR)	26
Δ	INAPPLICABLE REQUIREMENTS	3/

LIST OF ABBREVIATIONS

BCAA Benton Clean Air Authority
BTU British Thermal Units
CFC Chlorofluorocarbon
CFR Code of Federal Regulations

CFR Code of Federal Regulations

CO Carbon Monoxide dscf Dry standard cubic foot

Ecology Washington State Department of Ecology
EPA United States Environment Protection Agency

FCAA Federal Clean Air Act

gr/dscf Grain per dry standard cubic foot
MACT Maximum Available Control Technology

MRRR Monitoring, Recordkeeping, and Reporting Requirement

MVAC Motor Vehicle Air Conditioner

NOC Notice of Construction
NO_x Oxides of Nitrogen
OA Order of Approval

O₂ Oxygen

O&M Operation & Maintenance
PE Professional Engineer
PM Particulate Matter

PM₁₀ Particulate Matter with aerodynamic diameter ≤ 10 micrometers

ppm Parts per million

PSD Prevention of Significant Deterioration
RACT Reasonably Available Control Technology

RCW Revised Code of Washington

RICE Reciprocating Internal Combustion Engine

RM EPA Reference Method from 40 CFR Part 60, Appendix A

SIP State Improvement Plan

SO₂ Sulfur Dioxide

TRS Total Reduced Sulfur

TSP Total Suspended Particulate

VOC Volatile Organic Particulate

WAC Washington Administrative Code

This Air Operating Permit (AOP), hereafter referred to as the "Permit", is authorized under the procedures established in Washington Administrative Code (WAC) 173-401 and Title V (US Code §7661 et seq) of the Federal Clean Air Act (FCAA). As used in this Permit, "term", "condition", "standard", and "requirement" have the same meaning as "applicable requirement" specified under 40 Code of Federal Regulations (CFR) 70.2 and WAC 173-401-200.

The Permit is intended to contain a comprehensive list of the local, state, and federal air pollution regulations and standards applicable to the Permittee's facility and to assure and provide for certification of compliance with those requirements. This document describes the applicable requirements and cite the originating local, state, or federal regulation or requirement. Federal requirements may be direct (e.g., FCAA or CFR citation) or established under the Washington State Implementation Plan (SIP).

BCAA is the primary authority that can enforce all requirements - federal, state, and local requirements - listed in the Permit. However, EPA and private citizens may also take enforcement actions under the Permit for those requirements that are federally enforceable; federal regulations, regulations that have a SIP date, and terms of ADPs are federally enforceable. Rules, regulations, and permits that are not SIP approved or federally promulgated are not federally enforceable.

1. STANDARD TERMS & CONDITIONS

1.1. Address of Record

All information required for submittal throughout this permit, is to be submitted to BCAA, EPA Region 10, or both as specified by the applicable requirement, at the following addresses:

Director

Benton Clean Air Agency 526 South Steptoe Street Kennewick, WA 99336 EPA Region 10 Administrator Air Permits MS: OAQ-108 1200 Sixth Avenue Seattle, Washington 98101

1.2. 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, shall promptly submit such supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was filed but prior to release of a draft permit.

[WAC 173-401-500(6), 09/16/2002]

1.3. Compliance Schedules

The permittee shall continue to comply with applicable requirements with which it is currently in compliance. The permittee shall meet applicable requirements on a timely basis that become effective during the permit term.

[WAC 173-401-510(2)(h)(iii), 05/17/1994]

1.4. Permit Shield

- **1.4.1.** Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance that are specifically included and identified in this permit.
- **1.4.2.** The permit shield shall not apply to any insignificant emissions unit or activity designated under WAC 173-401-530.

[WAC 173-401-530(3), 9/16/2002], [WAC 173-401-640(1), 10/04/1993]

1.5. Reasonably Available Control Technology (RACT)

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal shall be considered RACT for the purpose of permit issuance or renewal. RACT determinations under section 8, chapter 252, Laws of 1993 shall be incorporated into an operating permit as provided in WAC 173-401-730.

[WAC 173-401-605(3), 10/04/1993], [RCW 70.94.154, 1/4/2001 (S)]

1.6. Record Keeping

- **1.6.1.** The permittee shall keep records of required monitoring information that includes, where applicable, the following:
 - **1.6.1.1.** The date, place, and time of the sampling or measurements.
 - 1.6.1.2. The date(s) analyses were performed.
 - **1.6.1.3.** The company or entity that performed the analysis.
 - 1.6.1.4. The analytical techniques or methods used.
 - **1.6.1.5.** The results of such analyses.
 - 1.6.1.6. The operating conditions existing at the time of sampling or measurement.
- **1.6.2.** The permittee shall keep records describing 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 those changes.
- 1.6.3. The permittee shall retain records of all required monitoring data and support information for a period of five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings from continuous monitoring instrumentation, and copies of all reports required by this permit.
- **1.6.4.** All required recordkeeping shall be available to BCAA in accordance with Conditions 1.13 and 1.19.2.

[WAC 173-401-615(2), 09/16/2002], [WAC 173-401-630(2)(b), 09/16/2002], [40 CFR 60.7(b), 60.7(f), 7/01/2001], [BCAA Order #2002-0015, 5.4.5].

1.7. Reporting

- 1.7.1. Monthly Deviation Reports. The permittee shall report deviations from permit conditions, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Such deviations shall be reported "promptly" to BCAA at the address included in this permit. For deviations which represent a potential threat to human health or safety, "promptly" means as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered. All deviations shall be reported no later than thirty days after the end of the month during which the deviation is discovered. The permittee shall submit a full written report including the known causes, the corrective actions taken, and the preventative measures to be taken to minimize or eliminate the chance of recurrence. The source shall maintain a contemporaneous record of all deviations. Responsible official certification in accordance with Condition 1.7.5 of monthly deviation reports shall be included in each semi-annual monitoring report covering all deviation reports made during the previous six (6) month period.
- 1.7.2. Semi-Annual Monitoring Reports. The permittee shall submit semi-annual monitoring reports by April 15th (for the period including July 1st through December 31st) and October 15th (for the period including January 1st through June 30th) annually. The first monitoring report submitted under this permit shall cover the period beginning on the effec-

tive date of this permit and ending the thirty-first of December. Thus, the first monitoring report may cover a period less than twelve (12) months. Subsequent monitoring periods shall be six (6) months.

- 1.7.2.1. Upon issuance of this final renewal permit, an initial monitoring report in accordance with the conditions of the previous Air Operating Permit shall be submitted for the period of time between the latest monitoring report and the effective date of this permit. This initial monitoring report shall be due no later one hundred and five (105) days following the final effective date of this permit.
- 1.7.2.2. Each monitoring report shall describe and include the following:
 - 1.7.2.2.1. Monitoring, recordkeeping, and reporting information that is required to be submitted semi-annually according to the terms of this permit.
 - 1.7.2.2.2. All instances of deviations from permit requirements.
- 1.7.2.3. All monitoring reports shall be submitted to BCAA at the address identified in Section 1.1.
- **1.7.2.4.** All monitoring reports must be certified by a responsible official consistent with Condition 1.7.5.
- 1.7.3. Compliance Certifications. The permittee shall submit a certification of compliance with permit terms and conditions by April 15th annually. The first compliance certification submitted under this permit shall include certification for the period beginning on the effective date of this permit and ending the thirty-first of December. Thus, the first certification may cover a period less than twelve (12) months. Subsequent certification periods shall be twelve (12) months. BCAA may require that compliance certifications be submitted more frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement.
 - 1.7.3.1. Upon issuance of this final permit, an initial compliance certification in accordance with the terms of the previous Air Operating Permit shall be submitted for the period of time between the latest certification submitted and the effective date of this final renewal permit. This initial certification shall be due no later than one hundred and five (105) days following the effective date of this permit.
 - 1.7.3.2. Each compliance certification shall describe and include the following:
 - **1.7.3.2.1.** The permit term or condition that is the basis of the certification.
 - 1.7.3.2.2. The current compliance status.
 - 1.7.3.2.3. Whether compliance was continuous or intermittent.
 - **1.7.3.2.4.** The methods used for determining compliance, currently and over the reporting period consistent with WAC 173-401-615(3)(a).
 - 1.7.3.3. All compliance certifications shall be submitted to BCAA and EPA at the addresses identified in Section 1.1.

- **1.7.3.4.** All compliance certifications must be certified by a responsible official consistent with Condition 1.7.5.
- 1.7.3.5. For the purpose of submitting compliance certifications, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test had been performed.
- 1.7.4. Emission Inventory. The permittee shall submit an inventory of actual emissions from the source for each calendar year. The inventory shall include segmented stack and fugitive emissions of TSP, PM₁₀, PM_{2.5}, SO₂, CO, TRS, NO_x, lead, ammonia, VOCs, and other pollutants, and shall be submitted no later than April 15th of the following year. The source shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions inventories shall be sent to BCAA at the address identified in Section 1.1. Responsible official certification in accordance with Condition 1.7.5 of the annual emissions inventory shall be included in each annual certification report.
- 1.7.5. Submittals. Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) shall be submitted to BCAA at the address identified in Section 1.1. Any document submitted to BCAA pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state, "Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete". The permittee shall promptly, upon discovery, report to BCAA any material error or omission in these records, reports, plans or other documents.

[WAC 173-400-105(1), 08/15/2001 (S)], [WAC 173-400-107(3), 8/20/1993 (S)], [WAC 173-401-500(6), 09/16/2002], [WAC 173-401-520, 10/04/1993], [WAC 173-401-615(3), 09/16/2002], [WAC 173-401-630(1), 10/04/1993], [WAC 173-401-630(5)(a), 10/04/1993], [WAC 173-401-630(5)(d), 10/04/1993], [WAC 173-401-630(5)(d), 10/04/1993], [40 CFR 52.33(a), 07/01/2001], [40 CFR 60.11(g), 07/01/2001]

1.8. Duty to Comply

The permittee must comply with all conditions of this Air Operating Permit. Any permit non-compliance constitutes a violation of RCW 70.94 and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.

[WAC 173-401-620(2)(a), 10/04/1993]

1.9. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

1.10. Permit Actions

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[WAC 173-401-620(2)(c), 8/15/2001]

1.11. Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[WAC 173-401-620(2)(d), 10/04/1993]

1.12. Duty to Provide Information

The permittee shall furnish to BCAA, within a reasonable time, any information that BCAA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to BCAA copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to BCAA along with a claim of confidentiality. BCAA shall maintain confidentiality of such information in accordance with RCW 70.94.205.

[WAC 173-401-620(2)(e), 10/04/1993]

1.13. Permit Fees

The permittee shall pay fees as a condition of this permit in accordance with BCAA's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in RCW 70.94. BCAA may revoke this operating permit if the permit fees are not paid, per WAC 173-401-930(3).

[WAC 173-401-620(2)(f), 10/04/1993], [WAC 173-401-930(3), 12/30/1993], [RCW 70.94.162(1), 1/4/2001 (S)]

1.14. Severability

If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.

[WAC 173-401-620(2)(h), 10/04/1993], [RCW 70.94.905, 1/4/2001 (S)]

1.15. Permit Appeals

This permit or any conditions in it may be appealed only by filing an appeal with the Washington State Pollution Control Hearings Board (PCHB) at P.O. Box 40903, Olympia, WA 98504-0903 and serving it on BCAA within 30 days of receipt pursuant to RCW 43.21B.310. This pro-

vision for appeal in this section is separate from and additional to any federal rights to petition and review under §505(b) of the FCAA.

[WAC 173-401-620(2)(i), 10/04/1993], [WAC 173-401-735, 04/02/1997]

1.16. Permit Continuation

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

[WAC 173-401-620(2)(j), 10/04/1993]

1.17. Enforceability

All terms and conditions of the permit are enforceable by the EPA and citizens unless specifically designated as state-only enforceable.

[WAC 173-401-625, 10/04/1993]

1.18. Inspection and Entry

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow BCAA, EPA or an authorized representative to perform the following:

- 1.18.1. Enter upon the permittee's premises where a Title V source is located or emission-related activity is conducted, or where records must be kept under the conditions of this permit.
- 1.18.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- 1.18.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- **1.18.4.** As authorized by WAC 173-400-105 and the FCAA, sample or monitor, at reasonable times, substances or parameters for assuring compliance with this permit or other applicable requirements.
 - 1.18.4.1. BCAA may require the permittee to conduct stack testing and /or ambient air monitoring and report the results to BCAA.
 - 1.18.4.2. BCAA may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on April 1, 2004), or Ecology's Source Test Manual Procedures for Compliance Testing. The permittee shall be required to provide platform and sampling ports. BCAA shall be allowed to obtain a sample from any emissions unit. The permittee shall be given the opportunity to observe the sampling and to obtain a sample at the same time.

- **1.18.5.** No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.
- **1.18.6.** Nothing in this condition shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

[WAC 173-400-105, 08/15/2001], [WAC 173-401-630(2), 10/04/1993], [BCAA Order #2002-0015, 7.1], [RCW 70.94.200, 1987]

1.19. Excess Emissions

- 1.19.1. Due to an Emergency. The permittee may seek to establish that noncompliance with a technology-based¹ emission limitation under this permit was due to an emergency². To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - **1.19.1.1.** An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - 1.19.1.2. The permitted facility was being properly operated at the time of the emergency;
 - **1.19.1.3.** During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit; and
 - 1.19.1.4. The permittee submitted notice of the emergency to BCAA within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 1.19.2. Unavoidable. Excess emissions determined to be unavoidable under the procedures and criteria in WAC 173-400-107 shall be excused and not subject to penalty.
 - 1.19.2.1. The permittee shall have the burden of proving to BCAA that excess emissions were unavoidable. (173-400-107(1))
 - 1.19.2.2. Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under Condition 1.7.1 and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control

Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g. a new source performance standard) rather than those established to attain a health based air quality standard.

An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of this source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes this source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation or operator error.

- equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage. (173-400-107(2))
- 1.19.2.3. Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under Condition 1.7.1 and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices. (173-400-107(5))
- 1.19.2.4. Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under Condition 1.7.1 and adequately demonstrates that:
 - 1.19.2.4.1. The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
 - **1.19.2.4.2.** The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and
 - 1.19.2.4.3. The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded. (173-400-107(6))

[WAC 173-400-107, 8/20/1993 (S)], [WAC 173-401-645, 10/04/1993], [BCAA Order #2002-0015, 5.4.4], [BCAA Order #2002-0015, 6.2]

1.20. Operational Flexibility

[WAC 173-401-650, 10/04/1993]

The permittee did not propose any further alternative operating scenarios.

1.21. New Source Review

The permittee shall not construct a new source(s) or make modifications requiring review under WAC 173-400-110, WAC 173-400-112, WAC 173-400-113, WAC 173-400-141, or WAC 173-460 before the permittee obtains written final approval from BCAA in accordance with those regulations, pays the appropriate fees required by WAC 173-400-116, and pays the cost of public notice described in WAC 173-400-171.

[WAC 173-400-110, 8/20/93, 8/15/2001 (S)], [WAC 173-400-113, 8/20/93, 8/15/2001 (S)], [WAC 173-400-116, 8/15/2001 (S)], [WAC 173-400-141, 8/15/2001 (S)], [WAC 173-400-171, 8/20/93, 8/15/2001 (S)], [WAC 173-460 7/21/1998 (S)], [RCW 70.94.152, 1/4/2001 (S)]

1.22. Replacement or Substantial Alteration of Emission Control Technology

Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee shall file for and obtain approval from BCAA according to that regulation. The permittee shall pay the appropriate fees required by WAC 173-400-045(4) prior to commencing construction.

[WAC 173-400-045(4), 8/15/2001 (S)], [WAC 173-400-114, 8/15/2001 (S)], [RCW 70.94.153, 1/4/2001 (S)]

1.23. Administrative Permit Amendments

- 1.23.1. An administrative permit amendment is a permit revision that:
 - 1.23.1.1. Corrects typographical errors within the permit;
 - 1.23.1.2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides for a similar minor administrative change at the source;
 - 1.23.1.3. Requires more frequent monitoring or reporting by the permittee;
 - 1.23.1.4. Allows for a change in ownership or operational control of this source where the permitting authority has determined that no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to BCAA;
 - 1.23.1.5. Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.
- 1.23.2. Administrative permit amendments for purposes of the acid rain portion of the permit shall be governed by the regulations promulgated under Title IV of the FCAA in effect on April 1, 2004.
- **1.23.3.** The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.
- 1.23.4. The permitting authority shall, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to condition 1.23.1.5 above.

[WAC 173-401-720, 10/04/1993], [BCAA Order #2002-0015, 7.4]

1.24. Changes Not Requiring Permit Revisions

1.24.1. The permittee is authorized to make changes described in this section without a permit revision, providing the conditions included below are met. The permit shield as author-

ized under WAC 173-401-640 shall not apply to any change made pursuant to this section.

- 1.24.1.1. The proposed changes are not Title I (FCAA) modifications;
- 1.24.1.2. The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions;
- **1.24.1.3.** The proposed changes do not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit; and
- 1.24.1.4. The facility provides BCAA and EPA Region 10 with written notification at least seven (7) days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event;
- 1.24.2. Section 502(b)(10) changes. Pursuant to Condition 1.24.1, the permittee is authorized to make section 502(b)(10) changes (as defined in WAC 173-401-200) without a permit revision. The written notification required under 1.24.1.4 shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- 1.24.3. Changes related to emissions trading under an emissions cap. Pursuant to Condition 1.25.1, the permittee is authorized to trade increases and decreases in emission in the permitted facility, where the Washington state implementation plan provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading. Such changes shall be subject to the following:
 - 1.24.3.1. The written notification required under Condition 1.24.1.4 shall include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which the source will comply in the applicable implementation plan and that provide for the emissions trade. The notification shall state how any increases or decreases in emissions will comply with the terms and conditions of the permit. (The permit shield described under Condition 1.4 shall extend to terms and conditions that allow such increases and decreases.)
 - **1.24.3.2.** Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the applicable implementation plan authorizing the emissions trade.
 - 1.24.3.3. Upon receipt of the request of the permit applicant, BCAA shall issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases and decreases in the Title V source solely for the purpose of complying with a federally enforceable emissions cap that is

established in the permit independent of otherwise applicable requirements. The permit applicant shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision shall not be applied to any emissions units for which emission are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with all applicable requirements.

- **1.24.3.4.** No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
- **1.24.4.** A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to Condition 1.21.

[WAC 173-401-722, 09/16/2002], [WAC 173-401-620(2)(g), 10/04/1993]

1.25. Off-Permit Changes

The permittee is allowed to make changes not specifically addressed or prohibited by the permit terms and conditions without a permit revision, provided that:

- **1.25.1.** The proposed changes do not weaken the enforceability of any existing permit conditions.
- **1.25.2.** Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.
- 1.25.3. Before or contemporaneously with making the permit change, the permittee must provide written notice to BCAA and EPA Region 10 at the respective addresses included in this permit. Such written notice shall describe each such change, including the date, any change in emissions or pollutants emitted, and any applicable requirements that would apply as a result of the change.
- 1.25.4. The change shall not qualify for the permit shield under WAC 173-401-640.
- 1.25.5. The permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.
- **1.25.6.** A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to Condition 1.22.

[WAC 173-401-724, 10/04/1993]

1.26. Reopening for Cause

- **1.26.1.** BCAA will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:
 - 1.26.1.1. Additional requirements under the FCAA become applicable to the source three (3) or more years prior to the expiration date of this permit. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the ef-

- fective date of the requirement is later than the expiration date of this permit, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
- 1.26.1.2. Additional requirements (including excess emissions requirements) become applicable to this source under the acid rain program. Upon approval by EPA, excess emissions offsets plans shall be deemed to be incorporated into the permit;
- 1.26.1.3. BCAA or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit;
- **1.26.1.4.** BCAA or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- **1.26.2.** Proceeding to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.
- 1.26.3. Reopenings shall not be initiated before a notice of intent to reopen is provided to the permittee by BCAA at least thirty (30) days in advance of the date that this permit is to be reopened, except that BCAA may provide a shorter time period in the case of an emergency.
- **1.26.4.** All permit conditions remain in effect until such time as BCAA takes final action. [WAC 173-401-730, 10/04/1993]

1.27. Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA

- 1.27.1. The permittee shall comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in subpart B.
 - **1.27.1.1.** Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - **1.27.1.2.** Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - **1.27.1.3.** Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - 1.27.1.4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166 ("MVAC-like appliance" is defined at 40 CFR 82.152).
 - **1.27.1.5.** Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - 1.27.1.6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of ser-

vice, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records should indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.

- **1.27.1.7.** Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.
- 1.27.1.8. Person performing maintenance, service, repair, or disposal of appliances must certify to EPA that such person has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.
- 1.27.2. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A Production and Consumption Controls.
- 1.27.3. If the permittee performs a service on monitor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B Servicing of Motor Vehicle Air Conditioners.
- **1.27.4.** The permittee shall be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G Significant New Alternative Policy Program.

[40 CFR 82, 07/01/2001], [RCW 70.94.970, 1/4/2001 (S)], [RCW 70.94.980, 1/4/2001 (S)]

1.28. Demolition and Renovation (Asbestos)

Prior to, during and after conducting any activity to which 40 CFR 61, Subpart M – National Emission Standard for Asbestos, applies, the permittee shall comply with the requirements of that rule. Such activities include notification, demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing of fabricating certain items, spraying of certain materials, constructing roadways of certain materials, or disposal.

[40 CFR 61, Subpart M, 07/01/2001], [WAC 173-400-075(1), 8/15/2001 (S)]

1.29. Permit Renewal and Expiration

- 1.29.1. This permit is issued for a fixed term of five (5) years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least twelve (12) months, but no greater than eighteen (18) months prior to the date of permit expiration. Upon receipt of a timely and complete application for renewal, this source may continue to operate subject to final action by BCAA on the renewal application. This allowance shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by BCAA, any additional information identified as being needed to process the application. The application shall be sent to BCAA at the address included in this permit.
- 1.29.2. This source may not operate after the time that it is required to submit a timely and complete application, expect in compliance with a permit issued under WAC 173-401. If

the source submits a complete application for permit issuance (including for renewal) within twelve (12) months of the time the source becomes subject to the permit program, operation of the source without a permit is not a violation of WAC 173-401 until the permitting authority takes final action on the permit application.

[WAC 173-401-610, 10/04/1993]; [173-401-710(1), 8/15/2001], [WAC 173-401-705, 10/04/1993]

1.30. General Obligation

Nothing in this permit shall alter or affect the following;

- **1.30.1.** The provisions of section 303 of the FCAA (emergency orders), including the authority of EPA under that section.
- **1.30.2.** The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
- **1.30.3.** The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA.
- **1.30.4.** The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA.
- 1.30.5. The ability of BCAA 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(4), 10/04/1993]

1.31. Reporting of Emissions of Greenhouse Gases

WAC 173-441

WAC 173-440 requires owners and operators of affected facilities to quantify and report emission of greenhouse gases from applicable source categories listed in WAC 173-441-120. This regulation applies to any facility located in Washington State with total greenhouse gas emissions of ten thousand metric tons CO2e or more per calendar year. The permittee shall prepare and submit greenhouse gas reports to Ecology in according to the provisions of WAC 173-441-050 for each affected facility.

[WAC 173-441, 1/11/2011]

2. SPECIFIC TERMS AND CONDITIONS

Until this permit expires, is modified, or is revoked, this permittee is authorized to operate the processes outlined in Section 2. These processes are subject to the conditions included in Section 2, to the MRRRs listed in Section 3 and to all other terms and conditions specified in this permit.

The column entitled **Description** in each table contains only a summary/paraphrase of the condition, emission standard or work practice. The condition, emission standard, or work practice itself is the enforceable requirement and should be referenced for actual language.

Although there are many conditions with no on-going testing requirements, BCAA retains the authority to conduct or require that testing be conducted at the facility with respect to these conditions per WAC 173-400-105(4). Identification of the appropriate test method is necessary to make emission limits fully enforceable. Where the underlying applicable requirement does not specify the test method, BCAA has done so in this permit. [WAC 173-401-615(1)(a), 09/16/2002], [WAC 173-401-630(1), 09/16/2002], [WAC 173-400-105(4), 08/15/2001].

This section is applicable and enforceable with respect to all emission units source wide. Monitoring, recordkeeping, and reporting requirements in this section do not apply to insignificant units.

2.1. PROCESS #1: General Facility

Condition Number	Description	Condition, Emission Standard, or Work Practice Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Ref- erence
2.1.1.	All emission units are required to use RACT.	WAC 173-400-040, 1st paragraph, [20-Aug-1993]F WAC 173-400-040, 1st paragraph, [15-Aug-2001]S RCW 70.94.154(1)S	None Specified	1M
2.1.2.	Visible emissions shall not exceed 20% opacity for more than three (3) minutes in any one hour.	WAC 173-400-040(1),(excl (c)&(d)) [20-Aug-1993]F WAC 173-400-040(1) [15-Aug-2001]S	Described in 8M	8M

Condition Number	Description	Condition, Emission Standard, or Work Practice Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Ref- erence
2.1.3.	Particulate matter shall not be deposited beyond the property in sufficient quantity to interfere unreasonably with the use and enjoyment of other's property.	WAC 173-400-040(2) [15-Aug-2001]S BCAA Order #2002-0015, 6.6F	RM22	2M
2.1.4.	The source shall per- form maintenance to minimize, and take reasonable precautions to pre- vent, fugitive emis- sions from becom- ing airborne.	WAC 173-400-040(3) [20-Aug-1993]F WAC 173-400-040(3) [15-Aug-2001]S BCAA Order #2002-0015, 6.5	None Specified	2M
2.1.5.	Odors shall not be generated which unreasonably interfere with any other property owner's use and enjoyment of his property.	WAC 173-400-040(4) [15-Aug-2001]S BCAA Order #2002-0015, 6.4	None Specified	2M
2.1.6.	Emission or contaminants that are detrimental to the health safety or welfare of any person or causes damage to property or business shall not be generated.	WAC 173-400-040(5) [20-Aug-1993]F WAC 173-400-040(5) [26-Sep-2001]S	None Specified	2M

Condition Number 2.1.7.	Description $SO_2 \le 1000 \text{ ppm}_{vd} @ 7\% O_2 (60-minute)$	Condition, Emission Standard, or Work Practice Federal & State Enforceable = F State only Enforceable = S WAC 173-400-040(6, 1st) [20-Aug-1993]F	Testing RM 6	MRRR Reference
	average)	WAC 173-400-040(6, 1st) [15-Aug-2001]S		5M
2.1.8.	No person shall conceal or mask emission of a contaminant.	WAC 173-400-040(7) [20-Aug-1993]F WAC 173-400-040(7) [15-Aug-2001]S	None Specified	1M
2.1.9.	The source shall perform maintenance to minimize emissions of, and take reasonable precautions to prevent, fugitive dust from becoming airborne.	WAC 173-400-040(8) [20-Aug-1993]	None Specified	2M
2.1.10.	Particulate emissions of less than or equal to 0.23 gram/dry m³ or 0.1 grain/dscf of exhaust gas	WAC 173-400-050(1) & (3) [20-Aug-1993]F WAC 173-400-050(1) & (3) [15-Aug-2001]	RM 5	3M

Condition Number 2.1.11.	Description No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations.	Condition, Emission Standard, or Work Practice Federal & State Enforceable = F	Testing None Specified	MRRR Reference
2.1.12.	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations.	WAC 173-400-205 [20-Aug-1993]F WAC 173-400-205 [15-Aug-2001]S	None Specified	1M
2.1.13.	Open burning is subject to restrictions.	WAC 173-425 [17-Sep-1990]F	None Specified	1M
2.1.14.	Causing air pollution in violation of Chapter 70.94 is unlawful and subject to penalty.	RCW 70.94.040 [04-Jan-2002]F BCAA Order #2002-0015, 7.6	None Specified	1M
2.1.15.	Actual emissions from fire pumps are less than threshold levels.	WAC 173-401-530(4)F	None Specified	3M

2.2. PROCESS #2: Saturn 10-T1300 Natural Gas Turbine

Condition		Condition, Emission Standard, or Work Practice		
Number	Description	Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Re erence
2.2.1.	The turbine will only operate using pipeline quality natural gas.	BCAA Order #2002-0015, 5.1 F BCAA Order #2002-0015, 5.5.1 F	None Specified	1M
2.2.2.	NO _x emissions are limited to 75 ppm _{vd} corrected to 15% O ₂ and 18.85 tons per year. ³	BCAA Order #2002-0015, 5.2.1	RM 20	6M, 7M
2.2.3.	CO emissions are limited to 100 ppm _{vd} corrected to 15% O ₂ and 15.30 tons per year. ⁴	BCAA Order #2002-0015, 5.2.1	RM 10	6M, 7M
2.2.4.	SO ₂ emissions are limited to 150 ppm _{vd} corrected to 15% O ₂ and 0.21 tons per year. ⁴	BCAA Order #2002-0015, 5.2.1	None Specified	3M, 4M, 7M

³ Each emission unit is based upon a three (3) hour rolling averaging time.

Condition Number	Description	Condition, Emission Standard, or Work Practice Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Ref- erence
2.2.5.	VOC emissions are limited to 100 ppm _{vd} corrected to 15% O ₂ and 8.76 tons per year. ⁴	BCAA Order #2002-0015, 5.2.1	RM 25A	6M, 7M
2.2.6.	PM ₁₀ emissions are limited to 0.1 gr/dscf and 0.42 tons per year. ⁴	BCAA Order #2002-0015, 5.2.1	None Specified	3M, 7M
2.2.7.	Visible emissions less than or equal to 10% opacity, six (6) mi- nute average.	BCAA Order #2002-0015, 5.2.2F BCAA Order #2002-0015, 5.3 F	Described in 8M	6M, 8M
2.2.8.	Visible emissions at the property boundarry shall be 0% opacity.	BCAA Order #2002-0015, 5.2.3F	None Specified	8M
2.2.9.	Promptly address any complaints	BCAA Order #2002-0015, 5.4.3F	None Specified	2M
2.2.10.	Maintain emission unit specific O&M Manuals.	BCAA Order #2002-0015, 5.5.2F	None Specified	9М

		Condition, Emission Standard, or Work Practice		
Condition Number	Description	Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Ref- erence
2.2.11.	Legible copies of BCAA Order #2002 - 0015 and the O&M manual shall be readily available to operating personnel.	BCAA Order #2002-0015, 7.2 F	None Specified	1M

2.3. PROCESS #3: Reciprocating Internal Combustion Engine (RICE) MACT Compliance (40 CFR 63 Subpart ZZZZ)

Condition Number	Description	Condition, Emission Stand- ard, or Work Practice Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Reference
2.3.1.	Permittee must evaluate the status of the facility as to whether it meets the definition of remote annually.	40 CFR 63.6603 (f) F 40 CFR 66.6375 "Remote" F	None Speci- fied	10M
2.3.2.	Compressor Engines (EU 1 – 4) At all times the compressor engines must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.	40 CFR 63.660S(b)- Subpart ZZZZF	None Speci- fied	11M
2.3.3.	Compressor Engines (EU 1 – 4) The permittee shall conduct the following maintenance for the Compressor Engines: a. Change oil and filter every 2,160 hours of operation or annually, Pump Engine whichever comes first except as provided in 40 CFR 63 .662S(i); b. Inspect air cleaner every 2,160 hours of operation or annually, whichever Plan comes first; c. Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.	40 CFR 63.6602 & Table 2d, Section 8- Subpart ZZZZF	None Speci- fied	11M

Condition Number	Description (FU 10)	Condition, Emission Stand- ard, or Work Practice Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Reference
2.3.4.	Emergency Generator (EU 10) The permittee shall conduct the following maintenance for the emergency generator: a. Change oil and filter every 500 hours of operation or annually, Pump Engine whichever comes first except as provided in 40 CFR 63 .662S(i); b. Inspect air cleaner every 1,000 hours of operation or annually, whichever Plan comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	40 CFR 63.6602 & Table 2d, Section 8- Subpart ZZZZF	None Speci- fied	12M
2.3.5.	Emergency Generator (EU 10) The emergency generator may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by the Generator manufacturer, the vendor, or the insurance company associated with the engine. Required testing of such units should be minimized.	40 CFR 63.6640(f)- Subpart ZZZZF		12M
2.3.6.	Emergency Generator (EU 10) The emergency generator may operate up to 50 hours per year in non-emergency situations in addition to the time operated for maintenance checks and readiness Generator testing.	40 CFR 63.6640(f)- Subpart ZZZZF		12M

Condition Number	Description	Condition, Emission Stand- ard, or Work Practice Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Reference
2.3.7.	Fire Pumps (EU 14 and 15) The permittee shall conduct the following maintenance for the fire pump: a. Change oil and filter every 500 hours of operation or annually, Pump Engine whichever comes first except as provided in 40 CFR 63 .662S(j); b. Inspect air cleaner every 1,000 hours of operation or annually, whichever Plan comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	40 CFR 63.6602 & Table 2d, Section 4- Subpart ZZZZF		13M
2.3.8.	Fire Pumps (EU 14 and 15) At all times the fire pump must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.	40 CFR 63.6605(b)- Subpart ZZZZF		13M

2.4. PROCESS: #4: GTS Regeneration Process Heater

Condition Number	Description	Condition, Emission Stand- ard, or Work Practice Federal & State Enforceable = F State only Enforceable = S	Testing	MRRR Reference
2.4.1.	Permittee must use pipeline quality natural gas in the emission unit.	BCAA Order #2015- 0007. 5.1.1.2F	None Speci- fied	9M
2.4.2.	The permittee must maintain emission unit specific fuel purchase and fuel use records.	BCAA Order #2015- 0007. 5.1.1.1	None Speci- fied	9М
2.4.3.	The permittee must maintain emission unit specific O&M Records,	BCAA Order #2015- 0007. 5.1.1.3F	None Speci- fied	9М
2.4.4.	The GTS Regenerative Heater must have a maximum throughput of 10,200 lb/hr of regen gas.	BCAA Order #2015- 0007. 5.4.4 F	None Speci- fied	9M

3. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (MRRR)

The following monitoring, recordkeeping and reporting requirements are consistent with WAC 173-401-630(1), WAC 173-401-615(1)(a), and WAC 173-401-615(1)(b).

1M. Operational Review. At least once every twelve (12) months, the permittee shall review actual operations, the Operations and Maintenance manuals, permit application materials, Orders of Approval, and other relevant documents and information for the purpose of verifying that plant operations are being conducted in accordance with the referenced permit conditions, the documents identified above and with good air pollution control practices in mind.

The permittee shall maintain records that include the date such reviews occur, the name of the person conducting the review, the information reviewed, summary information on any deviations identified, and date and time when corrective action was initiated and completed. Upon discovery that any equipment is being operated in a manner inconsistent with any of the above mentioned documents, the permittee shall initiate corrective action within two (2) business days. All such discoveries shall be reported to BCAA as required by Standard Condition 1.7.1.

[WAC 173-401-615(1)(b), 09/16/2002]

- 2M. Complaint Records. The permittee shall maintain records of all complaints received. The permittee shall address and respond to all complaints within three (3) working days of receipt of the complaint. The recordkeeping shall include the following with regard to the complaint and the associated deviation and shall be made available to BCAA upon request:
 - 2M.1. A record of all written or complaints, complaints received by telephone or complaints received in person.
 - 2M.2. Time, and date of associated deviation, if any.
 - 2M.3. Cause of any deviation.
 - 2M.4. Estimate of any excess emissions and magnitude of deviation in relation to the applicable method standard.
 - 2M.5. Corrective action taken and the results of such action.

[WAC 173-401-615(1)(b), 09/16/2002], [BCAA Order #2002-0015, Condition 5.4.3]

3M. Quantify Emissions. At least once every six (6) months, emissions shall be quantified as follows:

Calculation of pollutant emission rate and/or concentration based on appropriate parametric monitoring data (this may include actual fuel usage, actual hours of operation, etc.) multiplied by an emission factor derived from the most recent compliant source test or, if testing derived factors are unavailable, the most recent emission factor published by USEPA. In the event that the most recent published data provides a range of emission factors, the calculation shall be performed using the most conservative factor within the provided range. Use of less conservative emission factors may be used only upon written approval from BCAA. In the event that

USEPA emission factors are either inappropriate or unavailable, the permittee shall propose an alternative emission factor (or emission estimation method) that may be used upon written approval by BCAA.

Calculations should be adjusted for percent oxygen as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). In addition to the information required under Standard Condition 1.7, all reports submitted must include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculation method, and an example of the calculation method used.

[WAC 173-401-615(1)(b), 09/16/2002]

4M. Sulfur Dioxide Limit. The permittee shall comply with the sulfur dioxide limitation through the use of pipeline quality natural gas as demonstrated through the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content is 20.0 grains/100 scf or less.

[BCAA Order #2002-0015, Condition 5.4.6]

5M. Source Performance Tests – Ingersoll Rand Engines & Vaporizers

5M.1. Reporting

- 5M.1.1. At least thirty (30) days prior to each test, a test plan shall be submitted to BCAA for approval. Once approved, the test plan should be followed. BCAA shall be notified of the exact date and time that the performance test(s) will be conducted as soon as the date is coordinated with the source test firm. Any change in the test date will be provided to BCAA at the earliest time with at least 24-hours notice
- 5M.1.2. A report of the performance test results shall be submitted to BCAA no later than sixty (60) days after each performance test is completed.

5M.2. Test Conditions

- 5M.2.1. Unless otherwise specified in the reference method, the emission unit shall be operated at a production rate as near to its maximum as feasible during the source performance tests.
- 5M.2.2. Unless otherwise specified in the reference method, source performance test shall consist of at least three (3) one-hour runs.
- 5M.2.3. The unit shall be operated under normal conditions in accordance with the operational parameters established by the manufacturer.
- 5M.3. Test Frequency: Source testing shall be conducted on one of the four Ingersoll-Rand engines and one of the four vaporizers as requested by BCAA.

5M.5. Alternative methods of testing and alternate testing requirements may be proposed in writing to the BCAA and may be used if approved by the BCAA.

[WAC 173-400-105(2), 08/15/2001]

6M. Source Performance Tests – Saturn Engine

6M.1. Reporting

- 6M.1.1. BCAA shall be notified of the exact date and time that the performance test(s) will be conducted. At least thirty (30) days prior to each test, a test plan shall be submitted to BCAA for approval. Once approved, the test plan should be followed.
- 6M.1.2. A report of the performance test results shall be submitted to BCAA no later than sixty (60) days after each performance test is completed.

6M.2. Test Conditions

- 6M.2.1. Unless otherwise specified in the reference method, the emission unit shall be operated at a production rate as near to its maximum as feasible during the source performance tests.
- 6M.2.2. Unless otherwise specified in the reference method, source performance test shall consist of at least three (3) runs of a minimum of twenty minutes.
- 6M.2.3. The unit shall be operated under normal conditions in accordance with the operational parameters established by the manufacturer and verified by the performance tests that conforms to the emission limits in Section 2.
- 6M.2.4. Alternative methods of testing and alternate testing requirements may be proposed in writing to the BCAA and may be used if approved by the BCAA.

6M.3. Test Frequency

- 6M.3.1. Periodic Source Performance Tests. Source testing shall be conducted every five (5) years from the initial performance test which occurred 20-Nov-2003.
- 6M.3.2. Should a source performance test indicate that the emission unit did not meet one or more of the emission limits, source performance tests will be required annually.
- 6M.3.3. If, after the period specified above, the periodic source performance tests show that the unit is in compliance with the emission limits, then the periodic source performance tests shall revert to the five (5) year schedule.

[BCAA Order 2001-0015, Condition 5.3]

7M. Fuel Usage. The permittee shall monitor and record the fuel usage of this unit using a fuel flow meter. The fuel flow meter shall be calibrated annually. The date and time of each calibration and any maintenance shall be recorded. Each calendar month, the permittee shall record monthly fuel.

[BCAA Order 2001-0015, Condition 5.4.2]

- **8M.** Visible Emissions. With regard to visible emissions, the following monitoring, recordkeeping, and reporting shall apply:
 - 8M.1. Monitoring At least once per week, for a minimum of forty-four (44) weeks per year, as well as any time excess visible emissions are observed, the permittee shall perform a qualitative assessment of visual emissions from all emission units that are sources of potential visible and/or PM emissions to which standards apply facility wide as well as those emission units and activities for which this MRRR is specified in the "MRRR Reference" column in Section 2. Insignificant emissions units are not subject to this MRRR requirement.

Each survey shall be performed as follows:

- 8M.2.1. The survey shall be conducted from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's position shall be at least fifteen (15) feet but no more then one-quarter (¼) mile from the source.
- 8M.2.2. The survey shall be conducted while the facility is in normal operation.
- 8M.2.3. The observer will be educated in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun, amount of ambient lighting, observer position relative to source, sun and wind direction, and the presence of uncombined water).
- 8M.2.4. The survey shall consist of a minimum of four (4) consecutive fifteen-second visual observations of each stack or emission point to identify whether the emission point under observation exhibits visible emissions. The observer shall look away from the emission point under observations between observations in order to rest their eyes.
- 8M.2.5. The permittee shall develop a standard form to be used for the qualitative assessment described above. A copy of the developed form should be provided to BCAA prior to the initial observation and whenever the form is changed.
- 8M.2. <u>Verification & Corrective Action</u> Upon completion of the qualitative assessment, the permittee's corrective actions shall be governed by the following:
 - 8M.2.1. If no opacity is observed, compliance is verified.

- 8M.2.2. If visible emissions are observed, the following actions shall be taken, as described below:
 - 8M.2.2.1. As soon as possible, but no later than twenty-four (24) hours after the visible emissions are observed, the permittee shall verify that the equipment and/or control device causing the emission problem is operating according to manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment or control device is not operating properly, NWP shall take corrective action within twenty-four (24) hours after the original observation of visible emissions to eliminate excess emissions.
 - 8M.2.2.2. Following the corrective action in 9M.2.2.1, conduct hourly visible emissions observations until no visible emissions are observed. If visible emissions are seen, repeat hourly visible emissions observations until corrective actions successfully rectify the opacity problem. Taking corrective action does not relieve the permittee from complying with the underlying condition, emission standard or work practice, nor does it relieve the permittee from the obligation to report any permit deviation as required in Standard Condition 1.7.1

8M.3. Recordkeeping

- 8M.3.1. The permittee shall maintain records of all monthly surveys and RM 9 tests performed for a period of five (5) years.
- 8M.3.2. The permittee shall maintain a current list of site personnel who have been educated as described in 9M.1.3 above.
- 8M.3.3. Recordkeeping with regard to each deviation shall include the following:
 - 8M.3.3.1. Time, date and duration of the deviation;
 - 8M.3.3.2. Cause of the deviation;
 - 8M.3.3.3. Estimate of excess emissions and magnitude of deviation; and
 - 8M.3.3.4. Corrective action taken, and the results of such action.

8M.4. Reporting

8M.4.1. Copies of all RM 9 test forms that either document a deviation or document a re-establishment of normal operation following a deviation shall be submitted to BCAA as part of the monthly deviation reports as required by Standard Condition 1.7.1. In addition to the RM 9 form, reporting shall also include copies of the qualitative assessment form(s) as well as the information required in item 9M.3.3 above. The permittee is not required to submit RM 9 forms for tests conducted which do not document a deviation or violation.

8M.4.2. Upon discovery that the monitoring as designed in insufficient to provide the indications of all deviations, the permittee shall notify BCAA of the monitoring deficiencies.

[WAC 173-401-615(1)(b) & (3), 9/16/2002], [WAC 173-401-630(1), 10/04/1993], [BCAA Order #2002-0015, Standard Conditions 5.4.1.1 & 5.4.1.2]

9M. Operation and Maintenance. The emission units shall be properly operated and maintained. Emission unit specific operations and maintenance (O&M) manuals shall be developed and followed by the permittee. Manufacturer's instructions may be referenced. O&M manual development shall be completed within sixty (60) days of startup of each emission unit. The emission units shall be operated and maintained in accordance with the O&M manual. Failure to follow the O&M manual and the adequacy of the O&M manual shall be two of the factors considered by the BCAA in determining whether the emission units are properly operated and maintained.

The O&M manual shall be reviewed at least annually and updated to reflect any modifications to the emission units or operation procedures. The permittee shall maintain records that include the date such reviews occur as well as the name of the person conducting the review.

The O&M manual shall at a minimum include:

- Normal operating parameters for each of the units involved in the process;
- A preventative maintenance schedule;
- Logs of actual maintenance inspections and observations made during inspections;
- Dates and nature of any other operations and maintenance performed; and
- Description of any corrective actions taken for abnormal operation.

Recordkeeping for Maintenance Activities:

- (1) Date and time of the maintenance activity;
- (2) Name of the person who performed the maintenance;
- (3) Identification of the unit or activity being maintained; and
- (4) Description of the maintenance being conducted.

[BCAA Order #2002-0015, Condition 5.5.2], [WAC 173-401-615(1)(b), 9/16/2002], [WAC 173-401-630(1), 10/04/1993]

- **10M Evaluation of Remoteness:** 63.6675 "Remote": (3) Stationary RICE that are not located on gas pipelines and that have 5 or fewer buildings intended for human occupancy and no buildings with four or more stories within a 0.25 mile radius around the engine. A building is intended for human occupancy if its primary use is for a purpose involving the presence of humans.
 - 10M.1 The permittee must annually evaluate whether this definition continues to apply.
 - 10M.2 The evaluation will be included with the Annual Compliance Certification.

[40 CFR 63.6675 "Remote"]

11M Ingersoll Rand Engines Monitoring

- 11M.1 The compressor engine shall be operated and maintained in accordance with the manufacturer's emission-related operation and maintenance instructions or the Permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63 Subpart ZZZZ Table 6 Section 9)
- 11M.2 Recordkeeping The Permittee shall document and record each incidence of maintenance and repairs conducted to demonstrate compliance with the emissions-related maintenance requirements. Activities that must be documented include but are not limited to oil and oil filter changes, air cleaner inspections, and inspection of hoses and belts. (63.6655(e))

[40 CFR 63 Subpart ZZZZ Table 6 Section 9, 63.6655(e)]

12M Emergency Generator Monitoring

- 12M.1 The permittee shall install a non-resettable hour meter. The permittee shall record the hours of operation of the emergency generator engine once per month.
- 12M.2 The permittee shall document how many hours are spent for non-emergency, non-maintenance non readiness testing operation.
- 12M.3 The permittee shall have documentation onsite from the manufacturer, vendor, or insurance company associated with the engine stating that maintenance checks and /or readiness testing is recommended.
- 12M.4 The emergency generator engine shall be operated and maintained in accordance with the manufacturer's emission-related operation and maintenance instructions or the Permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (Subpart ZZZZ Table 6 Section 9)

12M.5 Recordkeeping - The Permittee shall document and record each incidence of maintenance and repairs conducted to demonstrate compliance with the emissions-related maintenance requirements. Activities that must be documented include but are not limited to: oil and oil filter changes, air cleaner inspections, and inspection of hoses and belts. (63.6655(e))

[40 CFR 63 Subpart ZZZZ Table 6 Section 9, 40 CFR 63.6655(e), 40 CFR 63.6640]

13M – Fire Pumps Monitoring

- 13M.1 The fire pump engine shall be operated and maintained in accordance with the manufacturer's emission-related operation and maintenance instructions or the Permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (Subpart ZZZZ Table 6 Section 9)
- 13M.2 The Permittee shall document and record each incidence of maintenance and repairs conducted to demonstrate compliance with the emissions-related maintenance requirements. Activities that must be documented include but are not limited to: oil and oil filter changes, air cleaner inspections, and inspection of hoses and belts. (63.6655(e))

[40 CFR 63 Subpart ZZZZ Table 6 Section 9, 40 CFR 63.6655(e)]

Clean Air Act, Section 112(r) Risk Manage- ment Plans	40 CFR 68 "Chemical Accident Prevention Provision" does not apply to Northwest Pipeline's compressor stations because the compressor stations do not meet the definition of "stationary source". Under 40 CFR 68 Subpart A, definitions, the regulations state under the term "Stationary Source" the following:				
	"The term stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of this part. Transportation includes, but is not limited to, transportation subject to oversight or regulation under 49 CFR parts 192, 194, 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to DOT under 49 U.S.C. section 60105"				
	Northwest Pipeline is a natural gas transmission company and is currently regulated under 49 CFR part 192 and thus is not required to submit a risk management plan.				
Registration program WAC 173-400-099	The permittee is an air operating permit source. Pursuant to WAC 173-400-101 (7), air operating permit sources are exempt from the registration program established under WAC 173-400-099, and implemented in accordance with WAC 173-400-100 through WAC 173-400-104.				

[WAC 173-401-640(2)]

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