



**STATEMENT OF BASIS FOR CHAPTER 401 AIR OPERATING PERMIT  
AOP-6 RENEWAL #4  
GAS TRANSMISSION NORTHWEST LLC (GTN)**

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## LIST OF ABBREVIATIONS

BACT	Best available control technology
CFR	Code of Federal Regulations
CO	Carbon monoxide
dba	Doing business as
dscf	Dry standard cubic foot
ECOLOGY	Washington State Department of Ecology
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant as designated under Title III of FCAA
ISO	International Organization for Standardization (for gas turbines, ISO conditions are 59 degrees Fahrenheit, 60% relative humidity, and an atmospheric pressure of 29.92 inches of mercury absolute)
MMBTU	Millions of British thermal units
MRRR	Monitoring, recordkeeping, & reporting requirements
NAA	Nonattainment area
NOC	Notice of Construction
NOx	Oxides of nitrogen
O2	Oxygen
O&M	Operation & maintenance
Pb	Lead
PM	Particulate matter
PM-10	Particulate matter, 10 microns or less in size
PSD	Prevention of Significant Deterioration
RACT	Reasonably available control technology
RCW	Revised Code of Washington
RM	EPA reference method from 40 CFR Part 60, Appendix A
SCAPCA	Spokane County Air Pollution Control Authority (on June 3, 2007, SCAPCA was renamed to SRCAA)
SRCAA	Spokane Regional Clean Air Agency (prior to June 3, 2007, agency was called SCAPCA)
scf	Standard cubic foot
SO2	Sulfur dioxide
SOx	Oxides of sulfur
VOC	Volatile organic compounds
WAC	Washington Administrative Code

## DEFINITIONS OF WORDS AND PHRASES

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

Administrator	The administrator of the United States Environmental Protection Agency or her/his designee [WAC 173-401-200(12), 2/3/16]
Chapter 401 Permit	Any permit or group of permits covering a source, subject to the permitting requirements of Chapter 173-401 WAC, that is issued, renewed, amended, or revised pursuant to Chapter 173-401 WAC [WAC 173-401-200(5), 2/3/16]
Emission Limitation	A requirement established under the FCAA or Chapter 70A.15 (formerly 70.94) RCW which limits the quantity, rate or concentration of emissions of air contaminants on a continuous basis, including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction and any design, equipment work practice, or operational standard promulgated under the FCAA or Chapter 70A.15 RCW [(SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-030(29) (8/25/18))]
Emissions Unit	Any part of a stationary source or source which emits or would have the potential to emit any pollutant subject to regulation under the Federal Clean Air Act, Chapter 70A.15 RCW, or 70.98 RCW [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-030(31) (8/25/18)]
Federal Clean Air Act	Federal Clean Air Act, also known as Public Law 88-206, 77 Stat. 392. December 17, 1963, 42 U.S.C. 7401 et seq., as last amended by the Clean Air Act Amendments of 1990, P.L. 101-549, November 15, 1990 [WAC 173-401-200(14), 2/3/16]
Opacity	The degree to which an object seen through a plume is obscured, stated as a percentage [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-030(61) (8/25/18)]
PM Standard	An emission limitation on the amount of particulate matter an emissions unit may emit, generally expressed in terms of grains per dry standard cubic foot, pounds per hour, or some other concentration or emission rate.
Visible Emissions Standard	An emission limitation on visible emissions expressed in percent opacity

## I. BACKGROUND

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

The potential-to emit (PTE) for the facility has remained unchanged since the last new source review permit, PSD #01-05, was issued in April 2002 for unit 6C. The PTE emissions for the facility are given in the table below.

**Table 1 – PTE Criteria Pollutant and Hazardous Air Pollutant emissions**

Pollutant	Emissions (tons/yr)*
Particulate Matter (PM)/PM10	7.9
Sulfur Dioxide (SO <sub>2</sub> )	5.0
Oxides of Nitrogen (NO <sub>x</sub> )	426.8
Carbon Monoxide (CO)	340.7
Volatile Organic Compounds (VOC)	15.6
Total Hazardous Air Pollutants (HAPs)**	7.7

\* Emissions from generator based on permit limit of 150 hrs/yr.

\*\* Per review of AP-42, 49% of turbine VOC emissions are assumed to be HAPs and 100% of generator VOC emissions are assumed to be HAPs.

The facility is classified as a major source, as defined in Chapter 173-401 WAC, due to the following potential emissions given off by the turbines:

- oxides of nitrogen > 100 tpy;
- carbon monoxide > 100 tpy;
- greenhouse gases (CO<sub>2</sub>e) of over 100,000 tpy.

As a major source, GTN is required to apply for an operating permit under SRCAA's Title V air operating permit program as established in Chapter 173-401 WAC. WAC 173-401-700(8) requires that a statement be provided at the time a draft permit is issued under the Title V program, setting forth the legal and factual basis for permit conditions including reference to the applicable statutory or regulatory provisions for the conditions. This document provides the basis for the draft renewal permit for GTN.

## II. FACILITY SUMMARY

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

Emissions from the facility are due primarily to combustion and include: NOx, CO, particulate, sulfur dioxide, volatile organic compounds, and to a lesser extent some hazardous air pollutants. Annual actual criteria pollutant and total HAP emissions from the facility for the last completed operating year emission inventory (2020) are listed in Table 2 below.

**Table 2 – 2020 Actual Criteria Pollutant and HAP emissions**

<b>Pollutant</b>	<b>Emissions (tons/yr)</b>
Particulate Matter (PM)/PM10	4.32
Sulfur Dioxide (SO2)	2.59
Oxides of Nitrogen (NOx)	87.83
Carbon Monoxide (CO)	67.84
Volatile Organic Compounds (VOC)	10.13
Total HAPs*	4.99

\* Per review of AP-42, 49% of turbine VOC emissions are assumed to be HAPs and 100% of generator VOC emissions are assumed to be HAPS.

### **III. PERMITTING HISTORY**

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

- NOC #272 issued 5/9/90, modified 3/16/92, for temporary unit operated until SoLoNOx unit installed on Unit 6A; NOC was voided and replaced by NOC #404.
- NOC #404 issued 9/16/92, and revised 7/22/97, 6/6/00, and 10/27/17 for Unit 6A.
- NOC #1103 issued 4/4/02 and revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21 for Unit 6C and gas fired emergency generator.

The Washington State Department of Ecology has issued the following PSD permits to GTN:

- PSD #90-02 issued 7/18/90 for Unit 6A.
- PSD #01-05 issued 4/29/02 for Unit 6C and gas fired emergency generator.

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

- AOP #6 issued 1/22/98;
- AOP #6 Renewal #1 issued 5/2/03;
- AOP #6 Renewal #2 issued 4/14/08, and revised 3/6/09
- AOP #6 Renewal #3 issued 9/9/13, and revised 4/28/14

#### **IV. CURRENT AND NEW REGULATIONS SINCE LAST PERMIT RENEWAL**

##### **IV.A CURRENT REGULATIONS AND REQUIREMENTS:**

###### **IV.A.1 Ecology PSD permits**

The applicable requirements of the current Ecology PSD permits (PSD #90-02 and PSD #01-05) have been incorporated into this air operating permit renewal.

###### **IV.A.2 40 CFR 60, SUBPART GG – STANDARDS OF PERFORMANCE FOR STATIONARY GAS TURBINES**

40 CFR Subpart GG establishes emission standards for owners and operators of stationary gas turbines with i) a peak load heat input of  $\geq 10$  MMBTU/hr, and ii) were constructed, modified, or reconstructed after 10/3/77. Both Units 6A and 6C were constructed after 10/3/77 so the regulation applies. The applicable requirements of Subpart GG have been included in the renewed air operating permit.

Unit 6B was constructed before 10/3/77, therefore Subpart GG does not apply to Unit 6B. Unit 6B may be subject to Subpart GG if an engine change out or another project constitutes a modification or a reconstruction.

###### **IV.A.3 40 CFR 63, SUBPART ZZZZ - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES**

40 CFR 63 Subpart ZZZZ establishes emission standards for owners and operators of stationary reciprocating internal combustion engines at major and area sources of Hazardous Air Pollutant (HAP) emissions. The standards in Subpart ZZZZ vary depending on if the engine is located at a major or area source of HAPs, if the engine is considered “new” or “existing”, and if the engine is used for emergency or non-emergency purposes. GTN is considered an area

source for HAPs. Per Subpart ZZZZ, the generator set at GTN is considered an existing source because it was constructed (i.e., installed) before 6/12/06. The engine burns natural gas and is used for emergency purposes. The applicable requirements of Subpart ZZZZ have been included in the renewed air operating permit.

## **IV.B NEW REQUIREMENTS SINCE LAST PERMIT RENEWAL**

### **IV.B.1 SRCAA NOC permit revisions**

NOCs #404 and #1103 have both been revised since the last AOP-6 renewal.

NOC #404 was revised 10/27/17 to i) amend the gas sulfur content monitoring to be consistent with the EPA approved custom fuel monitoring schedule for natural gas supplied to Unit 6A, as revised January 1999, and ii) remove one-time only conditions that have been met.

NOC #1103 was revised 3/13/20 to i) remove the new source review requirement for like-kind engine change outs for Unit 6C, and ii) amend the gas sulfur content monitoring to be consistent with the EPA approved custom fuel monitoring schedule for natural gas supplied to the turbine, as revised January 1999. NOC #1103 was revised again in 12/17/21 to change the required testing frequency for Unit 6C.

The revised requirements of these NOCs have been included in the air operating permit renewal.

### **IV.B.2 Updates to Greenhouse Gas requirements**

#### Chapter 173-441 WAC – State GHG reporting requirements

On December 1, 2010, Ecology promulgated a regulation, Chapter 173-441 WAC, for state reporting of greenhouse gas (GHG) emissions. Chapter 173-441 WAC establishes GHG reporting requirements that apply to owners and operators of certain facilities that directly emit GHG in Washington. The rule applies to any facility that emits 10,000 metric tons carbon dioxide equivalent (CO<sub>2</sub>e) or more per calendar year in total GHG emissions. In 2015, Ecology amended chapter 173-441 WAC, in order to maintain consistency with EPA's greenhouse gas reporting program. The amendments included revising the global warming potentials in WAC 173-441-040, updating calculation and monitoring methods, and minor streamlining revisions to reporting requirements. In 2016, Ecology further amended Chapter 173-441 WAC, in order to have terminology consistent with Chapter 173-442 WAC – Clean Air Rule [see Clean Air Rule discussion below]

For an existing facility that began operation before January 1, 2012, GHG emissions must be reported to Ecology for calendar year 2012 and each subsequent calendar year. The report is due by March 31<sup>st</sup> of each calendar year for GHG emissions in the previous calendar year if a person is also required to report GHG emission to EPA under 40 CFR Part 98. The report is due by October 31<sup>st</sup> of each calendar year for GHG emissions in the previous calendar year if a person is not required to report GHG emissions to EPA under 40 CFR Part 98.



The most recently estimated actual emissions for GTN were in 2020: 98,205 total MTCO<sub>2e</sub>. Because the actual GHG emissions for GTN exceed 10,000 metric tons CO<sub>2e</sub>, the annual GHG emission reporting requirements of Chapter 173-441 WAC apply. These reporting requirements were added to the air operating permit in the “General Monitoring, Recordkeeping, & Reporting” section of the permit.

#### 40 CFR Part 98 - Federal GHG reporting requirements

On October 30, 2009, and as amended on July 12, 2010, September 22, 2010, November 30, 2010, December 1, 2010, December 17, 2010, December 27, 2010, and March 18, 2011, EPA promulgated regulations for mandatory federal GHG reporting in 40 CFR Part 98. In general, the regulations require that facilities that emit 25,000 metric tons of CO<sub>2e</sub> must report their GHG emissions to EPA.

The federal GHG reporting requirements given in 40 CFR Part 98 are not considered “applicable requirements,” as defined in 40 CFR 70.2, under the title V operating permit program. Therefore, inclusion of the federal GHG reporting requirements in 40 CFR Part 98 is not required for the Title V permit.

#### 40 CFR Parts 51, 52, 70, and 71 - “Tailoring Rule”

On May 13, 2010, EPA issued a final rule that “tailors” the applicability criteria given in 40 CFR Parts 51, 52, 70, and 71 that determine which stationary sources and modification projects become subject to permitting requirements for GHG emissions under the PSD and Title V programs of the Clean Air Act. Per the 2010 version of the tailoring rule, on and after July 1, 2011, any existing or new source with the potential to emit more than 100,000 tpy CO<sub>2e</sub> needed a Title V permit. Additionally, for PSD, permitting requirements were triggered if the project was expected to increase GHG emissions by more than 75,000 tpy CO<sub>2e</sub>.

On June 23, 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA*, 134 S. Ct. 2427 (2014) (“UARG”). The Court held that EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology (BACT).

On April 10, 2015, in accordance with the Supreme Court decision, the D.C. Circuit issued an amended judgment in *Coalition for Responsible Regulation, Inc. v. EPA*, Nos. 09-1322, 10-073, 10-1092 and 10-1167 (D.C. Cir. April 10, 2015), which, among other things, vacated the PSD and title V regulations under review in that case to the extent that they require a stationary source to obtain a PSD or title V permit solely because the source emits or has the potential to emit GHGs above the applicable major source thresholds. The D.C. Circuit also directed EPA to consider whether any further revisions to its regulations are appropriate in light of UARG, and if so, to undertake to make such revisions.

On April 30, 2015, in response to the court decision, EPA issued a direct final rule to narrowly amend the permit rescission provisions in the PSD regulations. This action allows the rescission

of Clean Air Act PSD permits that issued by the EPA or delegated state and local permitting authorities on the sole basis of a source's GHG emissions.

On August 26, 2016, the EPA proposed a set of common sense changes needed to bring EPA's air permitting regulations in line with Supreme Court and D.C. Circuit decisions on greenhouse gas permitting. This rulemaking proposes revisions to existing PSD and title V regulations to ensure that neither the PSD nor title V rules require a source to obtain a permit solely because the source emits or has the potential to emit GHGs above the applicable thresholds.

As part of the AOP-6 renewal application, GTN submitted the following PTE estimates of their total GHG emissions, based on the maximum fuel consumption rating of each turbine:

<b>Unit Name</b>	<b>Fuel</b>	<b>Nameplate/ Rating</b>	<b>Annual Metric Tons*</b>
Unit 6A	Natural gas	14,600 hp (ISO)	53,473.0
Unit 6B	Natural Gas	15,210 hp (ISO)	67,867.1
Unit 6C	Natural Gas	19,500 hp (ISO)	67,450.3
Emergency Generator	Natural Gas	1,462 bhp	87.6**
Insignificant Emission Units	Natural gas	2.426 MMBTU/hr	1127.9
<b>Totals</b>			<b>190,005.9</b>

\*Given as CO2e

\*\*based on permit limit of 150 hrs of operation per year

Based on PTE emission estimates given above, GTN is considered major for GHG under the tailoring rule. SRCAA is meeting the requirements of the tailoring rule by incorporating the applicable state GHG reporting requirements under Chapter 173-441 WAC into this Title V permit. In addition, the permit incorporates the most recent version of Chapter 173-400 WAC (last updated 11/29/21), which adopts the tailoring rule new source review thresholds on a state level. This version of Chapter 173-400 WAC adopts by reference the subparts of 40 CFR 52.21, in effect on December 23, 2020, into WAC 173-400-720, "Prevention of significant deterioration (PSD)," which includes the tailoring rule new source review thresholds. The permit requires that GTN meet the requirements given in the current version of Chapter 173-400 WAC for any new source review project that might occur (see Condition I.G.1). This condition will ensure that GTN must obtain a PSD permit and meet BACT for any future project that causes an increase of GHG emissions above the thresholds established in the tailoring rule.

#### Clean Air Rule

On September 15, 2016, Ecology promulgated a regulation, Chapter 173-442 WAC, which establishes GHG emissions standards starting in 2017 for petroleum product producers and importers, natural gas distributors, and other "covered" stationary sources. The rule defines

"Covered stationary source GHG emissions" as GHG emissions from source categories listed in WAC 173-441-120.

The rule triggers GHG emission reduction requirements for a covered source when their three calendar year rolling average of GHG emission, beginning with calendar year 2012, are greater than or equal to the specified compliance threshold in the corresponding compliance period, as given in the table below:

**Table 3 - WAC 173-442-030**

Compliance Threshold (MT CO <sub>2</sub> e/Year)	First Compliance Period (Calendar Year)
100,000	2017-19*
95,000	2020-22
90,000	2023-25
85,000	2026-28
80,000	2029-31
75,000	2032-34
70,000	2035 and beyond

\*The 100,000 MT CO<sub>2</sub>e/year threshold is used for the three calendar year rolling average applicability determination beginning in 2012.

Based on the estimated GHG emissions for the GTN of > 98,000 metric tons of CO<sub>2</sub>e per year in the 2020-2022 compliance period, Chapter 173-442 WAC applies to GTN. However, in March 2018, Thurston County Superior Court ruled that parts of the Clean Air Rule are invalid. The Superior Court's ruling prevents implementation of the Clean Air rule regulations and compliance with the rule is suspended. On May 14, 2018, Ecology filed an appeal with the Washington State Supreme Court. Until the legal issues are resolved, the Clean Air Rule will not be placed in the air operating permit renewal.

#### **IV.B.3 Updates to excess emissions/emergency provisions**

On 5/22/15, Ecology received a SIP call from EPA regarding the Excess Emissions provisions given in WAC 173-400-107, specifically the treatment of excess emissions during periods of startup, shutdown, and malfunction (SSM). To address the SIP call, Ecology completed rulemaking with revised requirements given in WAC 173-400-108, titled "Emission limits during startup and shutdown" and a new section in WAC 173-400-082, titled "Alternative emission limit that exceeds an emission standard in the SIP" (filed on 8/16/18) that will be submitted to EPA for inclusion into Washington's SIP. Until the SIP is revised to include WAC 173-400-081 and -082, WAC 173-400-107 (version in effect on September 20, 1993) remains in effect. After the effective date of EPA's removal of the September 20, 1993 version of WAC 173-400-107 from the SIP, it will no longer be effective. Ecology also retained two state-only sections, (not federally enforceable), given in WAC 173-400-108 and 173-400-109, pertaining to unavoidable excess emissions that will take effect on the effective date of EPA's removal of the September

20, 1993 version of WAC 173-400-107 from the SIP. The renewal permit includes the requirements from WAC 173-400-107, along with the requirements from WAC 173-400-108 and -109, which will become state/local only requirements when WAC 173-400-107 is no longer effective. The requirements of WAC 173-081 and -082 are not specifically listed as applicable requirements in the renewal permit because neither section currently apply to GTN. If either section became applicable to GTN, it would be part of a new source review, regulatory order, or rulemaking action.

#### **IV.B.4 Recodification of Washington Clean Air Act.**

The Washington Clean Air Act, Chapter 70.94 RCW was recodified to Chapter 70A.15. All references to 70.94 were revised to 70A.15, and all references in the permit to specific sections of the Chapter were revised accordingly.

#### **V. COMPLIANCE ASSURANCE MONITORING (CAM) APPLICABILITY REVIEW**

Historically, CAM has not applied to any of the emission units at the GTN facility. There have been no changes to the facility since the last AOP renewal, and CAM still does not apply to the facility. The CAM applicability review is given below.

40 CFR Part 64 requires monitoring sufficient to provide a reasonable assurance of compliance with the applicable requirements (e.g., emissions limits) and to ensure operators pay the same level of attention to pollution control measures as to production activities. The rule applies to each pollutant-specific emissions unit (PSEU) at a facility that meets the following criteria:

- i. Is located at major source subject to Title V operating permits program, and
- ii. Is subject to an emission limitation and has a control device to meet that limit (e.g., electrostatic precipitators, scrubbers, fabric filters), and
- iii. Has precontrolled emissions > major source size threshold (e.g., >100 tons/year uncontrolled emissions).

Each of the CAM applicability criteria is discussed below:

- i. Is the PSEU located at major source subject to Title V operating permits program?*  
The GTN facility is subject to the Title V operating permits program, so all the emission units located at the facility meet criteria i. listed above.
- ii. Is the PSEU subject to an emission limitation and has a control device to meet that limit?*  
None of the emission units at the GTN facility use control devices to meet emission limitations, therefore none of the emission units meet criteria ii. listed above.
- iii. Does the PSEU have precontrolled emissions > major source size threshold (e.g., >100 tons/year uncontrolled emissions)?*  
Only Unit 6B has pollutant specific precontrolled emissions > 100 tons/year. The PTE for Unit 6B is 269 tons NOx per year and 202 tons CO per year, therefore Unit 6B meets the criteria listed in iii. listed above.

Because none of the emission units at the GTN facility meet all of the CAM applicability criteria listed above, CAM still does not apply to any of the emission units at the GTN facility.

## **VI. COMPLIANCE HISTORY**

SRCAA has performed a compliance inspection at GTN either annually or biannually since 1996. Since 1996, SRCAA has issued four Notices of Violation (NOVs) to GTN. These NOVs are described below:

- On March 16, 2006, SRCAA issued a Notice of Violation to GTN for failure to conduct a Cylinder Gas Audit on the NOx Continuous Emission Monitor (CEM) associated with Unit 6C during 3rd Quarter of 2005. The violation was a one-time occurrence. The requirement to operate the NOx CEMs is no longer applicable because GTN received approval from the Washington Department of Ecology and SRCAA to remove the NOx CEMs (after three years of operation) and follow an alternate NOx Monitoring Plan.
- On July 12, 2006, SRCAA issued a Notice of Violation to GTN for exceeding the carbon monoxide (CO) emission limit contained in AOP-6, Condition II.D.12 (formerly Condition 92) for Unit 6C during emission testing on Unit 6C performed at Station 6 on June 22, 2006. The exceedance was determined to be caused by mechanical failure (cracked fuel injector), which has been repaired. The violation has been corrected.
- On April 30, 2015, SRCAA issued a Notice of Violation to GTN for exceeding the NOx emission limit in contained in AOP-6, Condition 11.D.3 for Unit 6C. The exceedance was determined per source testing performed on Unit 6C on April 1, 2015. The exceedance was determined to be an outer turbine seal separation, which led to excess oxygen in the combustion chamber, resulting in excess NOx emission. After repair of the seal, Unit 6C was retested on May 15, 2015; the testing verified Unit 6C was back in compliance with the NOx emission limit.
- On March 15, 2022, SRCAA issued a Notice of Violation to GTN for failure to test Unit 6C as required per AOP-6, Conditions 8M and 12.M. The engine for Unit 6C was replaced on 2/15/00. Per Conditions 8M and 12 M, Unit 6C was required to be tested when total hours of operation for the engine were between 5,000 and 10,000 hours. As of the date of the 2021 compliance inspection (10/5/21), Unit 6C had been operated 11,706 hours since the engine replacement. Unit 6C was subsequently tested on 11/29/21.

## **VII. EMISSION UNITS**

## VII.A Significant Emission units

There are four significant emission units at GTN facility: Unit 6A, Unit 6B, Unit 6C, and the natural gas fired emergency generator. Each of these emission units is discussed below.

### Unit 6A

Unit 6A is a Solar unit rated at 14,600 HP (ISO). Unit 6A has been in operation since 1990. The NOC and PSD approvals (NOC #404 and PSD #90-02) for this unit allowed a unit capable of meeting the NSPS emission standards to be installed temporarily, followed by installation of a unit capable of meeting lower NOx emissions. The low NOx unit has been in place since about 1992. NOC #404 allows for like-kind replacement of Unit 6A's engine, provided specified requirements (i.e., notification, testing, etc.) are met.

Pertinent information on Unit 6A is given in Table 4 below.

**Table 4 – Unit 6A**

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

### Unit 6B

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

Pertinent information on Unit 6B is given in Table 5 below.

**Table 5 – Unit 6B**

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

**Unit 6C**

Unit 6C is a Solar Titan unit, equipped with low NOx technology and rated at 19,500 hp (ISO), was installed in 2002. The unit is subject to the NSPS emission standards given in 40 CFR 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines." NOC #1103 allows for like-kind replacement of Unit 6C's engine, provided specified requirements (i.e., notification, testing, etc.) are met.

Pertinent information on Unit 6C is given in Table 6 below.

**Table 6 – Unit 6C**

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

**Emergency Generator**

A 1,462 hp Caterpillar Model G3516 natural gas fired emergency generator was installed at Station 6 in 2002.

Pertinent information on the emergency generator is given in Table 7 below.

**Table 7 – Emergency Generator**

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

**VII.B Insignificant Emission Units**

Insignificant emission units (IEUs) include any activity or emission unit located at a major source which qualifies as insignificant under the criteria listed in WAC 173-401-530. A list of the IEUs, identified in the permit application, is presented below in Table 6. In order to remain an IEU, emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels.

Insignificant emission units are subject to the generally applicable requirements (i.e., facility-wide emission limitations). According to WAC 173-401-530, testing, monitoring, recordkeeping, and reporting are not required for insignificant emission units unless determined by the permitting authority to be necessary to assure compliance or unless it is otherwise required by a generally applicable requirement of the State Implementation Plan (SIP). SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units presented in Table 8 to assure compliance with the generally applicable requirements. SRCAA's determination was based on the following:

- SRCAA has not documented a violation of any of the generally applicable requirements in the past from the list of IEUs in Table 6 (i.e., the IEUs have had a consistent compliance history); and
- Most of the IEUs emit small quantities of pollutants and/or do not operate continuously.

**Table 8 – Insignificant Emission Units**

Emission Unit Description	ID Number Used in Permit Application	Basis / Justification for IEU Designation
Boiler #1, Cleaver Brooks Model P723-25, rated at 1.046 MMBTU/hr, natural gas fired	Process 1, #2	WAC 173-401-533(2)(e) (combustion source less than 5 MMBTU/hr exclusively using natural gas, butane, propane, and/or LPG)
Boiler #2, National Model 6-66A, rated at 1.25 MMBTU/hr, natural gas fired	Process 1, #3	WAC 173-401-533 (combustion source less than 5 MMBTU/hr exclusively using natural gas, butane, propane, and/or LPG)
Boiler #3 (hot water heater), Day & Night Model 50-JSF-6, rated at 130,000 BTU/hr, natural gas fired	Process 1, #4	WAC 173-401-533 (combustion source less than 5 MMBTU/hr exclusively using natural gas, butane, propane, and/or LPG)
Fugitive Dust	Process 1, #5	WAC 173-401-530(1)(d) (The emission unit or activity generates only fugitive emissions (as defined in WAC 173-400-030(31)))
Gasoline Storage Tank, 500 Gallon Capacity	Process 1, #8	WAC 173-401-533(2)(c) (Operation, loading and unloading of VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less)
Diesel Storage Tank, 500 Gallon Capacity	Process 1, #9	WAC 173-401-533(2)(c) (Operation, loading and unloading of



Emission Unit Description	ID Number Used in Permit Application	Basis / Justification for IEU Designation
		VOC storage tanks (including gasoline storage tanks), ten thousand gallons capacity or less)

**VIII. STANDARD TERMS AND CONDITIONS**

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

- A. PERMIT ADMINISTRATION
- B. INSPECTION & ENTRY
- C. EMERGENCY PROVISIONS
- D. GENERAL MONITORING, RECORDKEEPING, & REPORTING
- E. COMPLIANCE CERTIFICATION
- F. TRUTH AND ACCURACY OF STATEMENTS AND DOCUMENTS AND TREATMENT OF DOCUMENTS
- G. APPLICABLE WHEN TRIGGERED REQUIREMENTS

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

Note that the Table of Contents in the Statement of Basis and associated section numbering does not align with the Table of Contents and associated section numbering in the Operating Permit. This is due to the Statement of Basis including background information (facility description/summary, permitting/compliance history, current/new regulation review, etc.) that is not included in the Operating Permit. However, each cited permit condition is consistent with the condition given in the Operating Permit

**Note:** With respect to citations of WAC 173-400-107, the current version in the SIP (8/20/93 adoption date) is federally enforceable. However, the most recent revision to WAC 173-400-107 (8/16/18 adoption date) is not included in the SIP and is not federally enforceable. In this case, the cited requirements are the same for both versions, and the most recent adoption date will be cited, along with the SIP version date in parentheses.

## **VIII.A Permit Administration (Section I.A in the Operating Permit)**

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

Condition I.A.1. Federal Enforceability. All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. [WAC 173-401-625, 10/4/93]

Condition I.A.2. Duty to Comply. The permittee must comply with the terms and conditions of the permit. [WAC 173-401-620(2)(a), 10/4/93]

Condition I.A.3. Schedule of Compliance. The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis. [WAC 173-401-630(3), 2/3/16]

Condition I.A.4. Need to Halt or Reduce Activity Not a Defense. The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action. [WAC 173-401-620(2)(b), 10/4/93]

Condition I.A.5. Permit Actions. This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If GTN files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance. [WAC 173-401-620(2)(c), 10/4/93]

Condition I.A.6. Reopening for Cause. This term lists the conditions and requirements for when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements. [WAC 173-401-730, 10/4/93]

Condition I.A.7. Emissions Trading. This term describes emissions trading and other similar programs or processes that will not require revision of the permit. [WAC 173-401-620(2)(g), 10/4/93]

Condition I.A.8. Property Rights. This term states property rights or any exclusive privilege are not conveyed by the permit. [WAC 173-401-620(2)(d), 10/4/93]

Condition I.A.9. Duty to Provide Information. This term describes the conditions and timelines for providing information to SRCAA. [WAC 173-401-620(2)(e), 10/4/93]

Condition I.A.10. Duty to Supplement or Correct Application. This term describes the

conditions and requirements for providing supplementary facts or corrected information for permit applications, including any new requirements. [WAC 173-401-500(6), 9/16/02]

Condition I.A.11. Permit Fees. This term describes payment of fees and actions for failure to pay fees. [WAC 173-401-620(2)(f), 10/4/93]

Condition I.A.12. Severability. This term states that if any provision of the permit that is held to be invalid, the other permit terms will remain in effect and enforceable. [WAC 173-401-620(2)(h), 10/4/93]

Condition I.A.13. Permit Appeals. This term describes the procedures and timeline for appealing the permit or any condition of the permit. [WAC 173-401-620(2)(i), 10/4/93] [WAC 173-401-735(1), 4/2/97]

Condition I.A.14. Permit Renewal and Expiration. This term describes how long the permit will be in effect, the timeline for submittal of renewal applications, permit expiration, and the permittee's right to operate the source [WAC 173-401-610, 10/4/93] [WAC 173-401-705, 10/4/93] [WAC 173-401-710(1) & (3), 9/16/02]

Condition I.A.15. Permit Continuation. The terms describes the conditions under which the permit terms and conditions will not expire (i.e., issuance of renewal permit or submittal of a timely and complete renewal application). [WAC 173-401-620(2)(j), 10/4/93]

Condition I.A.16. Permit Shield. This term describes that compliance with a permit condition is deemed compliance with the applicable requirements upon which that condition is based. The term further describes that the permit shield will not affect the following:

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

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

### **VIII.B Inspection and Entry (Section I.B in the Operating Permit)**

Below are standard terms included in the subsection, Inspection & Entry. This subsection of the

permit contains requirements for allowing authorized access to a facility for purposes of assuring/determining compliance with air quality requirements. Generally, the language tracks the rule language closely with only minor changes for clarity and conciseness. There is no intent to alter the effect of the requirements.

Condition I.B.1. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the permittee must allow SRCAA, or an authorized representative, to enter a Chapter 401 facility or location where records are kept, to have access to and copy, at reasonable times records, to inspect, at reasonable times, any facility or equipment or operations regulated by the permit, to enter the facility at reasonable times without obstruction, and/or to perform sampling or monitoring, at reasonable times, for the purpose of assuring compliance.

[WAC 173-401-630(2), 2/3/16] [RCW 70A.15.2510 (formerly 70.94.200), 1998 - STATE/LOCAL ONLY] [SRCAA Regulation I, Section 2.02.E, 7/9/20p – STATE/LOCAL ONLY] [NOC #404, Condition #17, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/19] [NOC #1103, Condition #21, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [PSD #90-02 Amendment 1, Condition 12, 7/18/97]

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

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

### **VIII.C Emergency Provisions (Section I.C in Operating Permit)**

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

Condition I.C.1. Emergencies. This term incorporates the emergency provisions established in Chapter 173-401 WAC which allow for a positive defense to noncompliance with technology-based emission limitations if certain conditions are met. The time limits for reporting such emission events are included to assure that the permittee is aware of the timeframes. The time limits come from WAC 173-401-645 and WAC 173-401-615(3)(b). [WAC 173-401-645, 10/4/93] [WAC 173-401-615(3)(b), 9/16/02]

Condition I.C.2. Excess Emissions (prior to removal of WAC 173-400-107 from SIP). This term incorporates the excess emissions provisions of Chapter 173-400 WAC prior

to removal of WAC 173-400-107 from the Washington state SIP. If excess emissions due to startup or shutdown conditions, scheduled maintenance, or upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-107, such emissions are violations of the applicable statute, regulation, permit, or regulatory order but are not subject to penalty. The permittee shall submit a notification of the excess emissions in accordance with Condition I.D.7-Prompt Reporting of Deviations below, and submit a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence. After the removal of WAC 173-400-107 from the Washington state SIP, this condition is no longer in effect. [(SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-107 (8/16/18)), (WAC 173-400-107, 9/20/93)] [WAC 173-401-615(3)(b), 9/16/02]

Condition I.C.3. Excess Emissions (after removal of WAC 173-400-107 from SIP). This term incorporates the excess emissions provisions of Chapter 173-400 WAC after removal of WAC 173-400-107 from the Washington state SIP. If excess emissions due to startup or shutdown conditions, scheduled maintenance, or upsets are determined to be unavoidable under the procedures and criteria in WAC 173-400-109, such emissions are violations of the applicable statute, regulation, permit, or regulatory order but are not subject to penalty. Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under this condition. The permittee shall submit a notification of the excess emissions in accordance with Condition I.D.7-Prompt Reporting of Deviations below, and submit a full written report including information required under WAC [173-400-109\(5\)](#) supporting the claim that the excess emissions were unavoidable. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-108 and -109 (8/16/18)] – STATE/LOCAL ONLY [WAC 173-401-615(3)(b), 9/16/02]

Condition I.C.4. Report of Breakdown for State/Local Only Requirements in SRCAA Regulation I. This term establishes the conditions under which violations of SRCAA Regulation I may be excused. If pollutants are emitted in excess of the limits established by SRCAA Regulation I as a direct result of unavoidable upset conditions or unavoidable and unforeseeable breakdown of equipment or control apparatus, SRCAA may excuse the permittee from penalties if the permittee submits a notification of the breakdown in accordance with Condition I.D.7-Prompt Reporting of Deviations below and upon request by SRCAA's control officer, submits a report giving the causes, the steps to be taken to repair the breakdown and a time schedule for the completion of the repairs.

The control officer, upon receipt of a report from the permittee describing a breakdown, may:

- a. Allow operation exempt from penalties, but only for a limited time period, after which the permittee will be required to comply with SRCAA Regulation I or be subject to the penalties in SRCAA Regulation I, Section 2.11. Such an exemption may be withdrawn if the exempt operation becomes a cause of complaints; or

b. Require that the permittee curtail or cease operations until repairs are completed if the quantity of pollutants or the nature of the pollutants could cause damage.

Note: This provision does not provide relief against federally enforceable applicable requirements.

[SRCAA Regulation I, Section 6.08, 7/9/20- STATE/LOCAL ONLY]

#### **VIII.D General Monitoring, Recordkeeping, & Reporting (Section I.D in Operating Permit)**

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

Condition I.D.1. Records of Required Monitoring Information. This term details what records must be kept relating to monitoring. [WAC 173-401-615(2)(a), 9/16/02]

Condition I.D.2. Permanent Shutdown of an Emission Unit - If an emission unit is permanently shut down, rendering existing permit terms and conditions irrelevant, the permittee will not be required, after the shutdown, to meet any monitoring, recordkeeping, and reporting requirements, no longer applicable for that emissions unit, once any residual requirements, such as the semi-annual report and annual compliance certification covering the last period during which the unit last operated, have been met. All records, relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be kept in accordance with Conditions I.D.1 - Records of Required Monitoring Information and I.D.5 – Retention of Records

Contemporaneous with the shutdown of the emission unit, the permittee must record the date that operation of the emissions unit ceased, using a log or file on site. The shutdown date must be reported to SRCAA on the monitoring report, required under Condition I.D.6 - Monitoring Reports, covering the period during which the shutdown occurred. [WAC 173-401-725(4)(a), 10/4/93] [WAC 173-401-650(1)(a), 10/4/93]

Condition I.D.3. Operational Flexibility. In the event that an emissions unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why, and lengths of time that, the emissions unit was not operated. [WAC 173-401-650(1)(a), 10/4/93]

Condition I.D.4. Records of Changes. The permittee must keep records of changes made at the source that result in emissions of a regulated air pollutant, subject to an

applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from such a change. [WAC 173-401-615(2)(b), 9/16/02]

Condition I.D.5. Retention of Records. The permittee must keep monitoring data and support information for a period of five years. [WAC 173-401-615(2)(c), 9/16/02] [NOC #404, Condition 16, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

Condition I.D.6. Monitoring Reports. The permittee must submit monitoring reports to SRCAA as follows:

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

All instances of permit deviations must be identified in the monitoring reports. In addition, any permanent emission unit shutdowns must be reported in accordance with Condition I.D.2-Permanent Shutdown of an Emission Unit, above. The monitoring reports must be certified by a responsible official. SRCAA has added language to this condition that if monitoring reports are required, by an underlying requirement, to be submitted more frequently than every six months, the responsible official certification is only required for the semiannual reports but that the certification must cover all reports submitted since the last certification. The addition of this last requirement meets the intent of the law in that all reports are certified, while minimizing the burden on a source to go to the responsible official every time a report is submitted. Allowing a source this flexibility could become more important in the future, e.g., if SRCAA were to require a source to submit monitoring data electronically or by some other real time mechanism where responsible official certification would be difficult, if not impossible. [WAC 173-401-615(3)(a), 9/16/02]

Condition I.D.7. Prompt Reporting of Deviations. The permittee must promptly report deviations from permit requirements, the probable cause of such deviations, and any corrective measures taken. (Prompt is defined in this permit term and is consistent with the reporting time limits of terms in the Emergency Provisions section.) [WAC 173-401-615(3)(b), 9/16/02; WAC 173-401-645(3)(d), 10/4/93; (SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-107 (8/16/18)), (WAC 173-400-107, 9/20/93); SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-108 (8/16/18) – STATE/LOCAL ONLY;; and SRCAA Regulation I, Section 6.08.A.1, 7/9/20 – STATE/LOCAL ONLY]

Condition I.D.8. Emission Inventory. The permittee must submit an inventory of emissions from the source each year and must maintain records sufficient to document reported emissions. The PSD and NOC also require that the annual report include other

information including fuel usage, hours of operation, and monitoring information.

(SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-105 (8/16/18)) ] [PSD #90-02 Amendment 1, Condition 6, 7/18/97] [NOC #404, Condition 15, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] [NOC #1103, Condition 6, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

Condition I.D.9. Reporting of Emissions of Greenhouse Gases. The permittee shall comply with the applicable requirements given in Chapter 173-441 WAC related to the reporting of emissions of greenhouse gases. [Chapter 173-441 WAC, 9/15/16 – STATE/LOCAL ONLY]

Condition I.D.10. WAC 173-401-530(1)(a) Insignificant Emission Units. Emissions from units designated insignificant based solely on WAC 173-401-530(1)(a) must remain below threshold levels. Upon request from SRCAA, the permittee must demonstrate that the actual emissions from such a unit or activity are below the applicable emission thresholds. [WAC 173-401-530(6), 9/16/02]

Condition I.D.11. Report Submittals. This term provides the address to which reports must be sent and requires all reports to be certified by a responsible official. [WAC 173-401-520, 10/4/93]

Condition I.D.12. Rendering Device or Method Inaccurate. GTN may not render inaccurate any monitoring device or method required under Chapter 70A.15 or 70.120 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [(SRCAA Regulation I, Section 2.08(F), 7/9/20]

### **VIII.E Compliance Certification (Section I.E in Operating Permit)**

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

Condition I.E.1. Compliance Certification Submittals. This term covers the frequency for submitting compliance certifications. [WAC 173-401-630(5)(a), 2/3/16]

Condition I.E.2. Compliance Certification Contents. This term describes what must be included in each compliance certification. [WAC 173-401-630(5)(c), 2/3/16] [WAC 173-401-530(c), 9/16/02]

Condition I.E.3. Credible Evidence. For the purpose of submitting compliance certifications or establishing violations, the permittee shall not preclude the use,



including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 52.12, 2/24/97] [40 CFR 52.33, 2/24/97] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR 60.11(g), 1/12/11]

Condition I.E.4. Submittal to EPA. This term requires that certifications be sent to EPA as well as SRCAA. [WAC 173-401-630(5)(d), 2/3/16]

### **VIII.F Truth and Accuracy of Statements and Documents and Treatment of Documents (Section I.F in Operating Permit)**

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

Condition I.F.1. False Information. GTN may not make any false statement, representation, or certification in any form, notice, or report required under Chapter 70A.15 or 70.120 RCW or any ordinance, resolution, regulation, permit, or order in force pursuant thereto. [SRCAA Regulation I, 2.08.A & E, 7/9/20 - STATE/LOCAL ONLY]

Condition I.F.2. Alteration of Documents. This term prohibits the reproduction or alteration of any document issued by SRCAA, if the purpose of such is to evade or violate any requirement. [SRCAA Regulation I, 2.08.B, 7/9/20 - STATE/LOCAL ONLY]

Condition I.F.3. Availability of Documents. Any order required to be obtained by SRCAA Regulation I must be available on the premises designated on the order. [SRCAA Regulation I, 2.08.C, 7/9/20 - STATE/LOCAL ONLY]

Condition I.F.4. Posting of Notices. Notices which SRCAA requires to be displayed shall be posted. The permittee may not mutilate, obstruct, or remove any notice unless authorized to do so by the SRCAA. [SRCAA Regulation I, 2.08.D, 7/9/20 - STATE/LOCAL ONLY]

### **VIII.G Applicable When Triggered Requirements (Section I.G in Operating Permit)**

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

Condition I.G.1. New Source Review. Prior to the establishment of a new source, including modifications, the permittee may be required to file and obtain approval under SRCAA's Notice of Construction program. [Chapter 173-400 WAC, 9/20/93] [SRCAA Regulation I, Section 2.14(A)(8), 7/9/20, which adopts by reference Chapter 173-460 WAC (11/22/19)] [SRCAA Regulation I, Article V, 7/9/20 - STATE/LOCAL ONLY]


Condition I.G.2. Replacement or Substantial Alteration of Existing Control Equipment. Prior to replacing or substantially altering existing control equipment, the permittee shall file and obtain approval under SRCAA's Notice of Construction program. [SRCAA Regulation I, Section 2.14(A), 7/9/20, which adopts by reference WAC 173-400-114 (11/28/12)] [SRCAA Regulation I, Article V, 7/9/20 - STATE/LOCAL ONLY]

Condition I.G.3. Demolition and Renovation (Asbestos). The permittee must comply with applicable local, state, and federal requirements regarding demolition and renovation. [40 CFR Part 61 Subpart M, 2016] [SRCAA Regulation I, Section 2.17, 7/9/20, which adopts by reference 40 CFR 61, Subpart M, 2016] [SRCAA Regulation I, Article IX, 8/5/10 - STATE/LOCAL ONLY]

Condition I.G.4. Source Testing. To demonstrate compliance Ecology or SRCAA may conduct or require that a test be conducted using approved EPA methods from 40 CFR Parts 51, 60, 61, and 63 which are adopted by reference or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology, as of September 20, 2004, on file at Ecology. All testing shall be performed in accordance with SRCAA Regulation I, Section 2.09, "Source Tests." The permittee may be required to provide the necessary platform and sampling ports for Ecology personnel or others to perform a test of an emission unit. Ecology or SRCAA shall be allowed to obtain a sample from any emission unit. The permittee shall be given an opportunity to observe the sampling and to obtain a sample at the same time.

Methods or procedures shall be considered approved if the source submits a source test plan to SRCAA at least 30 days prior to the testing date, or a shorter time if designated in writing by SRCAA, and SRCAA approves the plan in writing. In order to maintain the approved status for the methods and/or procedures, any changes to the plan shall be approved by SRCAA in writing prior to implementation.

[WAC 173-401-615(1), 9/16/02] [SRCAA Regulation I, Section 2.09, 7/9/20 – STATE/LOCAL ONLY]

Condition I.G.5. Chemical Accident Prevention Provisions. A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.130, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68. [40 CFR Part 68, 2006] 

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

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

For GTN, this section of the Operating Permit contains six subsections:

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

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

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

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

Note that the Table of Contents in the Statement of Basis and associated section numbering does not align with the Table of Contents and associated section numbering in the Operating Permit. This is due to the Statement of Basis including background information (facility description/summary, permitting/compliance history, current/new regulation review, etc.) that is not included in the Operating Permit. However, each cited permit condition is consistent with the condition given in the Operating Permit

### **IX.A Facility-wide Emission Limitations (Section II.A in Operating Permit)**

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

The following requirements are included in this section:

Condition II.A.1: All emission units are required to use reasonably available control technology, in accordance with WAC 173-400-040. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(1) (8/16/18) - STATE/LOCAL ONLY]

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

Condition II.A.2: Visible emissions shall not exceed 20%, as specified in SRCAA Regulation I, 6.02. [SRCAA Regulation I, 6.02, 7/9/20- STATE/LOCAL ONLY]

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

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

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

Condition II.A.3: No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner or operator of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited or to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(3) (8/16/18)), (WAC 173-400-040(3), 3/22/91\*) (SRCAA Regulation I, 6.05.A, 7/9/20 – STATE/LOCAL ONLY)]

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

Potential fugitive emissions from the facility include dust from roads and parking lots. Quarterly inspections should reasonably assure compliance because GTN

has a consistent compliance history and does not have a lot of fugitive emission sources (i.e., the likelihood of violation is low). During normal operation, fugitive particulate matter is not generated at the facility.

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

Taking corrective action does not relieve GTN from the obligation to comply with the underlying emission limitation, nor does it relieve GTN from reporting any permit deviations as required in Condition I.D.7-Prompt Reporting of Deviations.

GTN must maintain records of each inspection and complaint investigation. Records must include the date and time of the inspection, observations made, the date and time of any complaints received, the date and time of the complaint investigation, the results of complaint investigations, a description of any corrective action taken, and any other information required in permit condition I.D.1-Records of Required Monitoring Information. Records must be kept in accordance with Condition I.D.5-Retention of Records, and, upon request, such records must be made available for inspection by SRCAA staff or other authorized representatives.

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

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

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

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

Condition II.A.4: Reasonable precautions must be taken to:

- a. Prevent PM from becoming airborne when constructing, altering, repairing, or demolishing buildings, appurtenances, and roads;
- b. Prevent tracking of PM onto paved roadways open to the public;
- c. Prevent the release of air contaminants, as specific in WAC 173-400-

- 040(3)(a), if located in an attainment area and not impacting a NAA;
- d. Prevent PM from becoming airborne when handling, transporting, and /or storing PM; and
  - e. Prevent fugitive dust from becoming airborne and source must be maintained and operated to minimize emissions.

[SRCAA Regulation I, 6.05.C, 7/9/20 – STATE/LOCAL ONLY] [SRCAA Regulation I, 6.05.D, 7/9/20 – STATE/LOCAL ONLY] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(4) & (9) (8/16/18)] [SRCAA Regulation I, 6.05.B, 7/9/20 – STATE/LOCAL ONLY]

MRRR: The same monitoring is required as for WAC 173-400-040(2) – Deposition, given in Condition II.A.3. GTN must perform quarterly inspections during daylight hours at the facility, investigate complaints, and take corrective action if potential problems are identified. A monitoring plan is required and records must be kept.

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

Condition II.A.5: Recognized good practices and procedures must be used to reduce odors to a reasonable minimum, in accordance with WAC 173-400-040(5).

[SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(5) (8/16/18) – STATE / LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(2) - Deposition, given in Condition II.A.3. GTN must perform quarterly inspections during daylight hours at the facility, investigate complaints, and take corrective action if potential problems are identified. A monitoring plan is required and records must be kept. Examples of what are considered reasonable precautions are included in the monitoring condition.

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

Condition II.A.6: It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be:

- a. Injurious to the health and safety of human, animal or plant life;
- b. Injurious or cause damage to property; or
- c. Which unreasonably interferes with enjoyment of life and property.

Compliance with this requirement shall be determined per the provisions given in SRCAA Regulation I, Section 6.04.

[SRCAA Regulation I, Section 6.04, 7/9/20 STATE/LOCAL ONLY]

MRRR: The monitoring is the same as for Condition II.A.5 which also pertains to odors. GTN must perform quarterly inspections during daylight hours at the facility, investigate complaints, and take corrective action if potential problems are identified. A monitoring plan is required and records must be kept. Examples of what are considered reasonable precautions are included in the monitoring condition.

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

Condition II.A.7: No person shall cause or permit the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.

[SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(6) (8/16/18)] [SRCAA Regulation I, 6.06.A, 7/9/20-STATE/LOCAL ONLY]

MRRR: The monitoring is the same as required for WAC 173-400-040(2) – Deposition, given in Condition II.A.3. GTN must perform quarterly inspections during daylight hours at the facility, investigate complaints, and take corrective action if potential problems are identified. A monitoring plan is required and records must be kept. Examples of what are considered reasonable precautions are included in the monitoring condition.

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

Condition II.A.8: No person shall cause or permit the installation or use of any means which conceals or masks an emission of an air contaminant which would otherwise violate any provisions of Chapter 173-400 WAC. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(8) (8/16/18)] [SRCAA Regulation I, 6.07, 7/9/20 - STATE/LOCAL ONLY]

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

Condition II.A.9: Particulate matter emissions from combustion and incineration units shall not exceed 0.1 gr/dscf, corrected to 7% oxygen, as specified in WAC 173-400-050(1) & WAC 173-400-050(3). [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-050(1) & (3) (8/16/18)]

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

Condition II.A.10: Particulate matter emissions from general process units shall not exceed 0.1 gr/dscf, as specified in WAC 173-400-060. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-060 (8/16/18)]

MRRR: No monitoring, recordkeeping, or reporting is required. The only general process units, as defined in WAC 173-400-030(40), are insignificant emission units. SRCAA has determined that testing, monitoring, recordkeeping, and reporting are not necessary for the insignificant emission units at GTN to assure compliance with the generally applicable requirements (see section on Insignificant Emission Units for more information).

Condition II.A.11: SO<sub>2</sub> emissions from each unit shall not exceed 1000 ppm at 7% O<sub>2</sub>, as specified in WAC 173-400-040(7). [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(7) (8/16/18)]

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

Condition II.A.12: No use of excess stack height or dispersion techniques to meet ambient air quality standards or PSD increments except as allowed under WAC 173-400-200. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-200 (1/10/05)]

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

Condition II.A.13: No varying of emissions according to atmospheric conditions or ambient concentrations except as allowed under WAC 173-400-205. [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-200 (2/19/91)]

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

Condition II.A.14: No outdoor burning, except as allowed under Chapter 173-425 WAC and/or Regulation I of SRCAA, Section 6.01. [SRCAA Regulation I, Section 2.14(A)(3), 7/9/20, which adopts by reference Chapter 173-425 WAC (3/13/00) SRCAA Regulation I, 6.01, 7/9/20 - STATE/LOCAL ONLY]

MRRR: No monitoring is required. As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to



determine if this prohibited activity was conducted during the reporting period.

Condition II.A.15: Handling and use of ozone-depleting substances must be in accord with 40 CFR Part 82. [40 CFR Part 82, 2016 (except those subparts for which a shield is granted in Section III below)]

MRRR: Additional monitoring, recordkeeping, and reporting requirements are not necessary to assure compliance with this condition, because the monitoring, recordkeeping, and reporting requirements are included with the applicable requirement (i.e., 40 CFR Part 82, 2006). As with all permit terms, GTN must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **IX.B Unit 6A Emission Limitations (Section II.B in Operating Permit)**

This subsection of the permit describes applicable requirements and corresponding monitoring, recordkeeping, and reporting requirements that apply to Unit 6A at the facility. Unit 6A went through new source review in 1990 (PSD #90-02) and 1992 (NOC #404). Unit 6A is also subject to the requirements of 40 CFR Part 60, Subpart GG, "Standards of Performance for Stationary Gas Turbines." The applicable requirements from PSD #90-02, NOC #404, and 40 CFR 60, Subpart GG are included in this section.

The following requirements are included:

Condition II.B.1: Except for as allowed in 40 CFR § 60.8(c), NO<sub>x</sub> emissions shall not exceed 199 ppm dry basis, corrected to 15% oxygen and ISO conditions. [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.332(a)(2), (a)(3), (d), & § 60.8(c), (7/8/04)]

MRRR: Past source testing conducted on Unit 6A has shown NO<sub>x</sub> levels well below 199 ppm. GTN tested the NO<sub>x</sub> emissions from Unit 6A in 1994, 1995, 1996, 1998, 2006, 2011, 2013, and 2019 (note that the 2011 testing was for a like-kind replacement of Unit 6A). The source test results ranged from 15.9 to 32.7 ppmvd at 15% O<sub>2</sub> ISO.

NOC #404 requires GTN to monitor NO<sub>x</sub> emissions, either with a continuous emission monitoring system (CEMS), or with the currently approved alternate monitoring plan (dated October 26, 2021) or a subsequently SRCAA approved plan. GTN has used an alternate monitoring plan since 1998 in lieu of a CEMS. The alternate monitoring system includes monitoring and review of operating parameters, including gas generator speed, fuel consumption, unit fired hours, and compressor pressure differential to assure that the turbine is operating properly.

The monitored parameters are used in conjunction with emission factors to calculate emissions on a monthly basis. The permittee is required to keep records of the monitored parameters and monthly emission calculations. The alternate monitoring plan is sufficient to monitor the NOx emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NOx levels measured during previous source tests.

In order to assure that the emission factors are accurate, if an alternate monitoring system is used, periodic source testing is required to verify emission factors associated with the monitoring system. The frequency of the testing depends on how close to the standard the results were from the most recent source test. The minimum frequency is once (between 5,000 and 10,000 hours of operation) over the lifetime (~ 30,000 hour of operation) of the engine; if the test results indicate NOx emissions are greater than 80%, but less than the NOx standard, additional testing is required when the total hours of operation for the engine are between 20,000 and 25,000 hours.

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

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

[WAC 173-400-615(1)& (2), 9/16/02] [PSD #90-02 Amendment 1, Conditions 1 & 4, 7/18/97] [NOC #404, Condition 12, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.7(b) & (f), 2/12/99] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.2: NOx emissions shall not exceed 42 ppm (1-hour average) at maximum operating conditions (i.e., maximum achievable load during test) @ 15% oxygen and ISO conditions as defined in 40 CFR Part 60, Subpart GG. [NOC #404, Condition 1, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

MRRR: The same monitoring is required as for Condition II.B.1. If testing is done to verify compliance, the testing must be conducted as described in Condition 2 of NOC #404, i.e., at maximum operating conditions, using the average of three 21-minute tests. [WAC 173-400-615(1)&(2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 1, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] NOTE: At least a portion of this MRRR is

gapfilling.

Condition II.B.3: NOx emissions shall not exceed 42 ppm corrected to 15% oxygen and ISO conditions on a one-hour average. [PSD #90-02 Amendment 1, Condition 1, 7/18/97]

MRRR: The same monitoring is required as for Condition II.B.1. [WAC 173-400-615(1)&(2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 1, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.4: Annual NOx emissions shall not exceed 72.3 tons per year. [PSD #90-02 Amendment 1, Condition 1, 7/18/97] [NOC #404, Condition 1, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

MRRR: The same monitoring is required as for Condition II.B.1. Based on past source test results for Unit 6A, calculated annual NOx emissions have been well below 72.3 tons per year. The highest calculated annual NOx emissions were 49.5 tons per year, based on results from the 1995 source test.

GTN is required to monitor NOx emissions, either with a continuous emission monitoring system (CEMS), or with the alternate monitoring plan, dated October 26, 2021, or a subsequently SRCAA approved amendment. The alternate monitoring system includes monitoring and review of operating parameters, including gas generator speed, fuel consumption, and compressor pressure differential to assure that the turbine is operating properly. The monitored parameters are used in conjunction with emission factors to calculate emissions on a monthly basis. GTN is also required to conduct periodic source tests to verify emission factors associated with the monitoring system. The frequency of the testing depends on how close to the standard the unit was during the last source test. The minimum frequency is once (between 5,000 and 10,000 hours of operation) over the lifetime (~ 30,000 hour of operation) of the engine; if the test results indicate NOx emissions are greater than 80%, but less than the NOx standard, additional testing is required when the total hours of operation for the engine are between 20,000 and 25,000 hours.

The permittee is required to keep records of the monitored parameters and monthly emission calculations. The monitored parameters are used in conjunction with emission factors to calculate emissions on a monthly basis. GTN is required to calculate and keep records of NOx emissions monthly and report NOx emissions to SRCAA annually. Over the last five years (for 2017-2022), the highest annual NOx emissions from Unit 6A, as reported to SRCAA in the emission inventory report, was 35.3 tons in 2019.

The alternate monitoring plan is sufficient to monitor the NOx emissions because of the nature of the turbine. The turbine is designed and operated without add-on

controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NOx levels measured during previous source tests.

[WAC 173-400-615(1)& (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 1, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.5: During startup and shutdown, the procedures approved in accordance with Condition 2 of NOC #404 shall be followed. [NOC #404, Condition 2, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

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

Condition II.B.6: SO<sub>2</sub> emissions shall not exceed 1.4 tons per year. [NOC #404, Condition 4, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

MRRR: GTN is required to monitor the total sulfur content of the fuel being fired in the turbines according to the provisions given in 40 CFR 60.334. Per 40 CFR 60.334(h)(3)(i), GTN may elect not to conduct daily monitoring of the sulfur content of the fuel, provided that a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less is submitted to SRCAA as part of the semi-annual monitoring report described in Condition I.D.6. For any period during which the sulfur content of the fuel being fired in Unit 6A exceeds 0.8% by weight, an excess emission report in accordance with 60.7(c), (d), and (e) shall be submitted to SRCAA. In lieu of daily monitoring, GTN is using their current tariff sheet, which specifies that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less, and is submitting the tariff sheet to SRCAA as part of the semi-annual monitoring report described in Condition I.D.6.

If GTN conducts daily monitoring of the sulfur content in the natural gas, the permittee shall notify SRCAA if the daily sulfur content in the natural gas exceeds 1 grain per 100 standard cubic feet of gas. The notification shall occur no later than three business days after the exceedance occurs and include the daily average sulfur content recorded, the anticipated length of time of the exceedance, and the corrective actions taken to bring the sulfur content below 1 grain per 100 standard cubic feet of gas.

The permittee shall maintain a record documenting a constant supplier or source of fuel. A substantial change in fuel quality shall be considered as a change in fuel supply. Any changes in supplier or source of fuel shall be reported to

SRCAA and EPA within 60 days of such change.

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

The permittee is required to calculate SO<sub>2</sub> emissions annually by calculating the maximum amount of SO<sub>2</sub> which could be emitted, based on the fuel sulfur content monitoring and assuming that all sulfur is converted to SO<sub>2</sub>. To date, the highest annual SO<sub>2</sub> emissions calculated were 1.15 tons in 2021. Over the past five calendar years (2017 -2022), the highest annual SO<sub>2</sub> emissions calculated were also 1.15 tons in 2021. GTN is calculating SO<sub>2</sub> emissions based on a worst-case assumption of 1 grain per 100 standard cubic feet of gas and verifying this assumption with periodic monitoring of the gas sulfur content at their Kingsgate tap [note that the average gas sulfur content, as monitored at the Kingsgate tap is 0.01 gr/100 standard cubic feet.

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

[WAC 173-401-615(1) & (2), 9/16/02] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.334, 2/24/06] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.7(c), (d) & (e), 2000] [PSD #90-02 Amendment 1, Condition 5, 7/18/97] [NOC #404, Condition 13, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] [NOC #1103, Conditions 6 & 8, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.7: No fuel with sulfur content greater than 0.8% by weight shall be burned<sup>1</sup>. [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.333(b), 7/8/04]

MRRR: Only natural gas may be burned in the unit. GTN is required to monitor the total sulfur content of the fuel being fired in the turbines according to the provisions given in 40 CFR 60.334. Per 40 CFR 60.334(h)(3)(i), GTN may elect not to conduct daily monitoring of the sulfur content of the fuel, provided that a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less is submitted to SRCAA as part of the semi-annual monitoring report described in Condition I.D.6. For any period during which the sulfur content of the fuel being fired in Unit 6A exceeds 0.8% by weight, an

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

excess emission report in accordance with 60.7(c), (d), and (e) shall be submitted to SRCAA. In lieu of daily monitoring, GTN is using their current tariff sheet, which specifies that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less, and is submitting the tariff sheet to SRCAA as part of the semi-annual monitoring report described in Condition I.D.6

[WAC 173-401-615(1) & (2), 9/16/02] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.333(b), 7/8/04] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.7(c), (d) & (e), 2000] [PSD #90-02 Amendment 1, Condition 5, 7/18/97] [NOC #404, Condition 13, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] [NOC #1103, Conditions 6 & 8, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.8: At all times, including periods of startup shutdown, and malfunction, to the extent practicable, the unit shall be operated in a manner consistent with good air pollution control practice for minimizing emissions.

Determination of whether acceptable operating and maintenance procedures are being used will be based on available information, including, but not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the equipment. [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.333(b)]

MRRR: The use of NO<sub>x</sub> monitoring and required recordkeeping, as described in the MRRR associated with Condition II.B.1, should assure that the unit is operating in a manner consistent with good air pollution control practice for minimizing emissions. GTN is required to keep records of all measurements for Unit 6A, including continuous monitoring system records.

[PSD #90-02 Amendment 1, Conditions 1 & 4, 7/18/97] [NOC #404, Conditions 14 & 16, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/21] [WAC 173-401-615(1) & (2), 9/16/02] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference CFR § 60.7(b) & (f), 2/12/99] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.9: PM<sub>10</sub> emissions shall not exceed 2.3 tons per year. [NOC #404, Condition 3, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

MRRR: The use of NO<sub>x</sub> monitoring and required recordkeeping, as described in the MRRR associated with Condition II.B.1, should assure that the unit is operating properly. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, and burning only natural gas, the PM<sub>10</sub> emissions should not deviate significantly from PM<sub>10</sub> levels reported in past emission inventories. Over the past five calendar years (2018 - 2022), the highest reported PM<sub>10</sub> emissions per GTN's annual emission inventory report was 0.9 tons in 2020. [WAC 173-401-615(1) &

(2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 3, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.10: CO emissions shall not exceed 49.5 tons per year. [NOC #404, Condition 5, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

MRRR: The same monitoring is required as for Condition II.B.1. Based on source test results for Unit 6A and the alternate monitoring plan, calculated annual CO emissions in the past have been below 49.5 tons per year. Over the past five calendar years (2018 -2022), the highest reported CO emissions for Unit 6A, per GTN's annual emission inventory report, was 23.7 tons in 2019. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, and burning only natural gas, the CO emissions should not deviate significantly from CO levels measured during previous source tests.

The emission factor for CO, used in the alternate monitoring plan, is required to be validated by periodic source testing. The minimum frequency is once (between 5,000 and 10,000 hours of operation) over the lifetime (~ 30,000 hour of operation) of the engine; if the test results indicate CO emissions are greater than 80%, but less than the CO standard, additional testing is required when the total hours of operation for the engine are between 20,000 and 25,000 hours.

[WAC 173-401-615(1) & (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 5, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.11: Total VOC emissions shall not exceed 10 tons per year. [NOC #404, Condition 5, 9/16/92 as revised on 7/22/97, 6/6/00, 10/27/17]

MRRR: The use of NOx monitoring and required recordkeeping, as described in the MRRR associated with Condition II.B.1, should assure that the unit is operating properly. Based on source test results for Unit 6A and the alternate monitoring plan, calculated annual VOC emissions in the past have been below 10 tons per year. Over the past five calendar years (2018-2022), the highest reported VOC emissions per GTN's annual emission inventory report was 8.9 tons in 2020. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, and burning only natural gas, the VOC emissions should not deviate significantly from VOC levels measured during previous source tests. [WAC 173-401-615(1) & (2), 10/4/93] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 6, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.12: Opacity from the exhaust stack shall not exceed 5% for an aggregate of more

than 3 minutes in any one hour period. [NOC #404, Condition 7, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] [PSD #90-02 Amendment 1, Condition 2, 7/18/97]

MRRR: The same monitoring is required as for Visible Emissions, WAC 173-400-040. Compliance with the opacity requirement is assured by certification that only natural gas is used. In addition, the use of NOx monitoring and required recordkeeping, as described in the MRRR associated with Condition II.B.1, should assure that the unit is operating properly. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, and burning only natural gas, the opacity should be lower than 5%. [WAC 173-401-615(1) & (2), 9/16/02] [PSD #90-02 Amendment 1, Condition 1 & 4, 7/18/97] [NOC #404, Condition 7, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.B.13: The exhaust stack shall be equipped with permanent sampling ports, which meet the requirements of 40 CFR Part 60, Appendix A, Method 1, to allow for collection of stack gas samples, and the permittee shall provide safe access to the stack for testing personnel. [NOC #404, Condition 8, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] [PSD #90-02 Amendment 1, Condition 3, 7/18/97]

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

Condition II.B.14: SRCAA shall be notified at least two weeks prior to any planned changes that may affect emissions. [NOC #404, Condition 9, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

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

Condition II.B.15: Only pipeline quality natural gas shall be used as fuel. [NOC #404, Condition 11, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

MRRR: GTN is required to certify that only natural gas was used in Unit 6A. In addition, GTN is required to maintain a record of all turbine operation on fuels other than pipeline quality natural gas. Use of any fuel other than pipeline quality natural gas in the turbine must be reported to SRCAA and EPA within 60 days of such use. [WAC 173-401-615(1) & (2), 9/16/02] [40 CFR § 60.334, 2/24/06] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.7(c), (d) & (e), 2000] [PSD #90-02 Amendment 1, Condition 5 & 6, 7/18/97] [NOC #404, Condition 11, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17] NOTE: At least a portion of this MRRR is gapfilling.



Condition II.B.16: Operation shall be conducted in compliance with all data and specifications submitted as part of the PSD application unless otherwise approved by the Department of Ecology. [PSD 90-02 Amendment 1, Condition 8, 7/18/97]

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

Condition II.B.17: Operating and maintenance manuals for all equipment that has the potential to affect emissions to the atmosphere shall be developed and followed. Copies of the manuals shall be made available to the Department of Ecology or SRCAA upon request. Emissions that result from a failure to follow the requirements of the manuals may be considered proof that the equipment was not properly operated and maintained. [PSD #90-02 Amendment 1, Condition 7, 7/18/97]

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

Condition II.B.18: Like-kind engine exchanges shall not be considered to be new stationary air contaminant sources for the purposes of SRCAA Regulation I, Article V, provided that the requirements of Condition 10M are met. At such a time that the United States Environmental Protection Agency or the Department of Ecology issues findings on air quality requirements that apply to like-kind engine exchanges, this condition is no longer in effect, and SRCAA will revise this condition to be consistent with these findings. [NOC #404, Condition 10, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

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

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

Condition 7M once the engine is installed at the site. The testing must be performed when the total hours of operation for the engine are between 5,000 and 10,000 hours, or SRCAA approved alternative timeline.

[NOC #404, Condition 10, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

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

CITATION	DESCRIPTION	REASON NOT INCLUDED IN PERMIT
NOC #404, Condition 1 (9/16/92 version)	NOx emission limit that expired 9/30/94	The expiration date has passed. The requirement is no longer applicable
NOC #404, Condition 9 (9/16/92 version)	Initial source testing requirement	One time requirement at the time of start-up. Initial source testing was conducted on 9/23/94. Results from the source test showed compliance with the NOx, CO, and VOC emission limits.
PSD #90-02, Condition 9	Approval becomes void construction does not begin within 18 months of approval	No longer applicable
PSD #90-02, Condition 10	Statement that any activity undertaken by GTN or others, in a manner inconsistent with the PSD application and approval, shall be subject to enforcement and that nothing in the approval may be construed as to relieve GTN from obligations under any state, local, or federal laws or regulations	Informational
PSD #90-02, Condition 11	Notification of start-up	One time requirement at start-up

**IX.C Unit 6B Emission Limitations (Section II.C in Operating Permit)**

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

Condition II.C.1: Like-kind engine exchanges shall not be considered to be new stationary air contaminant sources for the purposes of SRCAA Regulation I, Article V, provided

that the requirements of Condition 10M are met. At such a time that the United States Environmental Protection Agency or the Department of Ecology issues findings on air quality requirements that apply to like-kind engine exchanges, this condition is no longer in effect, and SRCAA will revise this condition to be consistent with these findings. [NOC #404, Condition 10, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17.]

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

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

[NOC #404, Condition 10, 9/16/92 as revised on 7/22/97, 6/6/00, and 10/27/17]

#### **IX.D Unit 6C Emission Limitations (Section II.D in Operating Permit)**

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

Condition II.D.1: Only natural gas, taken from the GTN GTN pipeline, shall be used to fire Unit 6C. [PSD 01-05 Amendment 1, Condition 1, 11/14/02] [NOC #1103, Condition 4, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

MRRR: GTN is required to certify that only pipeline quality natural gas was used as fuel

in Unit 6C in each compliance certification. [PSD 01-05, Amendment 1, Condition 6, 11/14/02]

Condition II.D.2: Except for as allowed in 40 CFR § 60.8(c), NO<sub>x</sub> emissions shall not exceed 214 ppm dry basis, corrected to 15% oxygen and ISO conditions. [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.332(a)(2), (a)(3), (d), & § 60.8(c), 7/8/04]

MRRR: Past source testing conducted on Unit 6C has shown NO<sub>x</sub> levels well below 214 ppm. GTN tested the NO<sub>x</sub> emissions from Unit 6C every year from 2002-2007, and also in 2008, 2012, 2015, 2017, 2019, and 2021. The source test results ranged from 8.7 – 20.4 ppm at 15% O<sub>2</sub> ISO.

PSD 01-05 required GTN to monitor NO<sub>x</sub> emissions with a continuous emission monitoring system (CEMS). Per the PSD permit, after 3 years of operation, GTN may propose an alternate means of monitoring and reporting NO<sub>x</sub> emissions to SRCAA and the Department of Ecology for approval. Once approved, the alternate system may be implemented in place of the CEM. GTN operated a NO<sub>x</sub> CEM on Unit 6C from 2002-2006. As allowed in the PSD permit for Unit 6C, GTN proposed a Station 6 Unit C Proposed NO<sub>x</sub> Alternate Monitoring Plan, dated June 8, 2006, in place of the NO<sub>x</sub> Continuous Emission Monitoring as an alternate means of monitoring and reporting NO<sub>x</sub> emissions. Ecology and SRCAA approved the alternate monitoring plan. GTN is required to meet the Station 6 Unit C Proposed NO<sub>x</sub> Alternate Monitoring Plan, dated June 8, 2006, or a subsequent Ecology and SRCAA approved version. The alternate monitoring system includes monitoring and review of operating parameters, including monthly fuel consumption, monthly fired hours, and ambient inlet temperature. The monthly data reports are reviewed for “reasonableness.” Any data unavailability, abnormalities, or adverse trends will be identified and corrective actions initiated by GTN. The monitored parameters are used in conjunction with emission factors to calculate emissions on a monthly basis. The emission factors were developed based on the source test data for Unit 6C. GTN is required to keep records of the monitored parameters and monthly emission calculations.

The alternate monitoring plan is sufficient to monitor the NO<sub>x</sub> emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NO<sub>x</sub> levels measured during previous source tests.

To verify the emissions are consistent with previous source tests, GTN is required to perform performance tests for NO<sub>x</sub> emissions as described in Condition 14M. Testing is required when total hours of operation on the unit are between 5,000 and 10,000 hours and also between 20,000 and 25,000 hours. If test results are greater than 70% of permitted limits, GTN will be required to conduct an additional test according to the schedule given in Condition 14M of the permit.

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

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

GTN is required to keep records and report the total NOx emissions from the Solar Titan turbine during the previous 12 month period to SRCAA semiannually with the monitoring report described in Condition I.D.6.

[PSD 01-05 Amendment 1, Conditions 9, 12, & 14, 11/14/02] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.7(b) & (f), 2000] [WAC 173-401-615(1)&(2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.D.3: Emissions of nitrogen oxides (NOx) shall not exceed the limits given below, corrected to 15 percent oxygen and ISO conditions, based on a one-hour block average. The emissions limits given below, in units of ppm, do not apply during startup, shutdown, load changes and step to idle periods.

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

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

MRRR: Past source testing conducted on Unit 6C has shown NOx levels below 25 ppm. GTN has tested the NOx emissions from Unit 6C every year from 2002-2007, and also in 2008, 2012, 2015, 2017, 2019, and 2021. . The source test results ranged from 8.7 – 20.4 ppm at 15% O2 ISO. In addition, three years of operation of a NOx CEM did not show any periods when the NOx emissions from Unit 6C were over the limits given in Condition II.D.3.

The same monitoring, recordkeeping, and reporting are required as for Condition II.D.2. GTN is required to follow the Station 6 Unit C Proposed NOx Alternate

Monitoring Plan, dated June 8, 2006, or a subsequent Ecology and SRCAA approved version. The alternate monitoring plan is sufficient to monitor the NOx emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NOx levels measured during previous source tests. GTN is required to perform performance tests for NOx emissions as described in Condition 14M. Testing is required when total hours of operation on the unit are between 5,000 and 10,000 hours and also between 20,000 and 25,000 hours. If test results are greater than 70% of permitted limits, GTN will be required to conduct an additional test according to the schedule given in Condition 14M of the permit.

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

[PSD 01-05 Amendment 1, Conditions 9, 12, & 14, 11/14/02] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.7(b) & (f), 2000] [WAC 173-401-615(1)&(2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

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

MRRR: The same monitoring, recordkeeping, and reporting are required as for Condition II.D.2. GTN is required to follow the Station 6 Unit C Proposed NOx Alternate Monitoring Plan, dated June 8, 2006, or a subsequent Ecology and SRCAA approved version. The alternate monitoring plan is sufficient to monitor the NOx emissions because of the nature of the turbine. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by operating parameters, the emissions should not change significantly from NOx levels measured during previous source tests. GTN is required to perform performance tests for NOx emissions as described in Condition 14M. Testing is required when total hours of operation on the unit are between 5,000 and 10,000 hours and also between 20,000 and 25,000 hours. If test results are greater than 70% of permitted limits, GTN will be required to conduct an additional test according to the schedule given in Condition 14M of the permit.

As part of the reporting requirements, GTN is required to report total NOx emissions from the Solar Titan turbine during the previous 12 month period. Based on past source test results for Unit 6C, calculated annual NOx emissions have been well below 85.0 tons per year. Over the last five years (for 2018-2022), the highest annual NOx emissions from Unit 6C, as reported to SRCAA in the emission inventory report, was 30.5 tons in 2019.

[PSD 01-05 Amendment 1, Conditions 9, 12, & 14, 11/14/02] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.7(b) & (f), 2000] [WAC 173-401-615(1)&(2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.D.5: Any activity, which is undertaken by the permittee or others, in a manner which is inconsistent with the PSD 01-05 application or determination, shall be subject to enforcement under the application regulations. [PSD 01-05 Amendment 1, Condition 15, 11/14/02]

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

Condition II.D.6: A copy of NOC #1103 and the conditions of approval shall be kept on site and made available to SRCAA personnel upon request. [NOC #1103, Condition 20, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

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

Condition II.D.7: Unit 6C shall be maintained in proper working condition. [NOC #1103, Condition 1, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

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

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

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

[PSD 01-05 Amendment 1, Condition 13, 11/14/02] [NOC #1103, Condition 1, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

Condition II.D.8: The exhaust stack shall have a minimum height of 59 feet above ground level and shall exhaust vertically. No elbows, tees, or stack caps that impede the vertical flow of air shall be installed at the end of the stack. [NOC #1103, Condition 2, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

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

Condition II.D.9: Visible emissions from the exhaust stack shall not exceed 5% opacity during any six-minute average. [NOC #1103, Condition 3, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

MRRR: During the initial source test, performed in August, 2002, the Method 9 tests showed 0% opacity from Unit 6C. Therefore, provided the unit is properly operated and maintained, the opacity should be consistent with the levels during the source test. Compliance with the opacity requirement is assured by proper O&M, as outlined in the MRRR associated with Condition II.D.7. In addition, the use of only natural gas should minimize visible emissions from the turbine. Lastly, the use of the Station 6 Unit C Proposed NOx Alternate Monitoring Plan, dated June 8, 2006 or subsequent Ecology and SRCAA approved version, as described in the MRRR associated with Condition II.D.2, should assure that the unit is operating properly.

[PSD 01-05 Amendment 1, Condition 6, 9, & 13 11/14/02] [NOC #1103, Conditions 1 & 4, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [WAC 173-401-615(1)&(2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.D.10: The sulfur content of the natural gas burned in Unit 6C shall not exceed 0.8% by weight. [NOC #1103, Condition 7, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.333(b), 7/8/04]

MRRR: Only natural gas may be burned in the unit. GTN is required to monitor the total sulfur content of the fuel being fired in the turbines according to the provisions given in 40 CFR 60.334. Per 40 CFR 60.334(h)(3)(i), GTN may elect not to conduct daily monitoring of the sulfur content of the fuel, provided that a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less is submitted to SRCAA as part of the semi-annual monitoring report described in Condition I.D.6 For any period during which the sulfur content of the fuel being fired in Unit 6A exceeds 0.8% by weight, an



excess emission report in accordance with 60.7(c), (d), and (e) shall be submitted to SRCAA. In lieu of daily monitoring, GTN is using their current tariff sheet, which specifies that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less, and is submitting the tariff sheet to SRCAA as part of the semi-annual monitoring report described in Condition I.D.6.

Since the NSPS SO2 limit does not apply during start-ups, shutdowns, or malfunctions, GTN is required to keep records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of Unit 6C; and any malfunction of the air pollution control equipment; if such records are used for purposes of demonstrating compliance with emission limits given in 40 CFR 60, Subpart GG.

[SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.334, 2/24/06, and [40 CFR § 60.7, 2000] [PSD #90-02 Amendment 1, Condition 5 & 12, 7/18/97] [NOC #1103, Conditions 6, 8, & 14, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [WAC 173-401-615(1)&(2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.D.11: At all times, including periods of startup shutdown, and malfunction, to the extent practicable, the unit shall be operated in a manner consistent with good air pollution control practice for minimizing emissions.

Determination of whether acceptable operating and maintenance procedures are being used will be based available information, including, but not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the equipment. [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.11(d), 2000]

MRRR: GTN is required to develop and follow an operation and maintenance (O&M) plan for the Solar Titan turbine, as described in the MRRR associated with Condition II.D.7.

[PSD 01-05 Amendment 1, Condition 13, 11/14/02] [NOC #1103, Condition 1 & 14, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [SRCAA Regulation I, Section 2.16(A), 7/9/20, which adopts by reference 40 CFR § 60.7(b) & (f), 2000] [WAC 173-401-615(1)&(2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.D.12: Emissions of carbon monoxide (CO) shall not exceed the limits given below, corrected to 15 percent oxygen and ISO conditions, based on a one-hour block average.

<u>Operating Conditions</u>	<u>CO Emission Limit</u>
Between 90% and 100% gas generator	50.0 ppmv

speed with hourly  
average ambient  
temperature above  
0° F

Between 90% and 100% gas generator  
speed with hourly  
average ambient  
temperature between  
-40° and 0° F

100.0 ppmv

[NOC #1103, Condition 9, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

MRRR:

Past source testing conducted on Unit 6C has shown CO levels below 50 ppmv, except during the 2006 source test, which showed CO emissions above 50 ppmv. The exceedance was determined to be caused by mechanical failure (cracked fuel injector), which has been repaired. GTN has tested the CO emissions from Unit 6C every year from 2002-2007, and also in 2008, 2012, 2015, 2017, 2019, and 2021. All of the tests have been performed with ambient temperatures above 0° F. With the exception of the 2006 source test (described above), CO emissions from the turbine measured during the source tests ranged from 1.2 ppm @ 15% O2 ISO at 97% load to 32.1 ppm @15% O2 ISO at 92% load, using EPA Method 10. The most recent source test results (performed in 2021) indicated CO emissions of 3.1 ppm @ 15% O2 ISO at 99% load and 1.2 ppm @15% O2 ISO at 92% load, using EPA Method 10.

Since the CO emissions have been below the limit of 50 ppm @ 15% O2 ISO during the source tests (not including the 2006 test which were not representative due to a mechanical problem), compliance with the CO emission limit is assured by proper O&M, as outlined in the MRRR associated with Condition II.D.7. The turbine is designed and operated without add-on controls, so as long as the unit is operating properly, the CO emissions should be consistent with levels measured during the source tests.

In addition to proper O&M, to verify that emissions are consistent with previous source tests, GTN is required to perform performance tests for CO emissions as described in Condition 12M. Testing is required when total hours of operation on the unit are between 5,000 and 10,000 hours and also between 20,000 and 25,000 hours. If test results are greater than 70% of permitted limits, GTN will be required to conduct an additional test according to the schedule given in Condition 14M of the permit.

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

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- a. A written test plan shall be submitted to SRCAA for review at least 30 days prior the start of each performance test. The test plan must be approved by SRCAA prior to the test.
- b. Testing of the turbine shall be conducted as close as possible to 100% gas generator speed (NGG), 94% NGG, and 92% NGG operating in the SoLoNOx mode. The average of these tests shall be used to calculate the hourly emissions when the turbine is operating between 92%-100% NGG.
- c. Testing of the turbine shall consist of three separate runs at each gas generator speed (NGG)
- d. The gas generator speed (NGG) and ambient temperature must be recorded during each test run and reported with the test results.
- e. The following constituents shall be measured during each run:
  - i. Volumetric flow rate and temperature, per EPA Methods 1 & 2 or Method 19;
  - ii. Oxygen (O<sub>2</sub>) & Carbon Dioxide (CO<sub>2</sub>), per EPA Method 19;
  - iii. Oxides of Nitrogen (NO<sub>x</sub>), per EPA Method 7E; and
  - iv. Carbon Monoxide (CO), per EPA Method 10.
- f. A performance test report must be prepared and submitted to SRCAA within 45 calendar days of test completion.

[PSD 01-05 Amendment 1, Condition 13, 11/14/02] [NOC #1103, Condition 1, 9, & 10, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

Condition II.D.13: Annual CO emissions shall not exceed 88.8 tons per year, based on a twelve month rolling total. CO emissions generated during performance testing required by NOC #1103 while out of SoLoNOx mode will not be counted toward the 88.8 tons per year annual limit. However, all CO emissions, including those generated during performance testing while out of SoLoNOx mode must be reported on the annual Emission Inventory, required in Condition I.D.8. [NOC #1103, Condition 9, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

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

Any changes to the above referenced monitoring plan shall be approved by SRCAA prior to implementation. Monthly records shall be kept of the total number

of hours that the turbine operates in the modes described above.

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

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

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

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

[PSD 01-05 Amendment 1, Conditions 9 & 14, 11/14/02] [NOC #1103, Conditions 9, 10, 12, & 14, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and

12/17/21] [WAC 173-401-615(1) & (2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.D.14: In the event Unit 6C must be removed for repair or overhaul, the unit may be replaced with a “like-kind” engine, provided that the procedures outlined in a) – c) below is followed. At such time that the United States Environmental Protection Agency or the Washington Department of Ecology issues findings on air quality requirements that apply to “like-kind” engine exchanges this procedure is no longer in effect, and SRCAA will revise or revoke this condition to be consistent with these findings.

- a) Unit 6C may be replaced, as necessary, for routine maintenance, provided that the replacement is a Solar Titan SoLoNOx turbine, rated at 19,500 hp (ISO). Each replacement turbine must comply with the emission limits given in Condition 9 for CO. For all other pollutants, emissions from each replacement turbine must be equivalent or less than the emission estimates presented in the Notice of Construction #1103 application.
- b) GTN shall notify SRCAA in writing of each Unit 6C replacement at least 30 days before the replacements are scheduled to occur. In situations where 30 days advance notice is impossible, due to an unexpected equipment failure or other maintenance problem, the notification shall occur within two days of determining that a replacement is required.
- c) Upon replacement, a performance test shall be performed on the new turbine, in accordance with Condition 14M.

[NOC #1103, Condition 13, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

MRRR:

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

- a. The permittee shall notify SRCAA in writing of each Unit 6C replacement at least 30 days before the replacements are scheduled to occur. In situations where 30 days advance notice is impossible, due to an unexpected equipment failure or other maintenance problem, the notification shall occur within two days of determining that a replacement is required.
- b. Upon replacement of Unit 6C, a performance test shall be performed on the new engine, in accordance with Condition 14M.

[NOC #1103, Condition 13, 4/4/02 as revised on 9/11/02,8/31/07, 3/13/20, and

12/17/21]

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

CITATION	DESCRIPTION	REASON NOT INCLUDED IN PERMIT
PSD 01-05 Amendment 1, Conditions 4, 5, & 11, 11/14/02	Initial source testing requirement	One time requirement at the time of start-up. Source testing was conducted on the turbine on August 27-29, 2002. Results from the source test showed compliance with the NOx emission limits.
PSD 01-05 Amendment 1, Condition 12a), 11/14/02	Submit performance test data from the initial performance test	Performance test data from initial performance test was submitted to SRCAA on October 9, 2002 (Unit 6C test report).
PSD 01-05 Amendment 1, Condition 17, 11/14/02	Approval becomes void if construction does not begin within 18 months of approval	Construction began within 18 months of approval date
NOC #1103, Condition 1, 4/4/02 as revised on 9/11/02 [note: the start-up notification requirement was removed in subsequent NOC #1103 revisions]	Start-up notification for Solar Titan gas turbine and emergency generator	Start-up notification was provided to SRCAA
NOC #1103, Condition 2, 4/4/02 as revised on 9/11/02 [note: the begin construction timeline requirement was removed in subsequent NOC #1103 revisions]	Approval becomes void if construction does not begin within 18 months of approval	Construction began within 18 months of approval date
NOC #1103, Condition 14, 4/4/02 as revised on 9/11/02 [note: the initial testing requirement was removed in subsequent NOC #1103 revisions]	Initial source testing requirement	One time requirement at the time of start-up. Source testing was conducted on August 27-29, 2002. Results from the source test showed compliance with the applicable emission limits.

**IX.E. Emergency Generator (aka auxiliary generator) Emission Limitations (Section II.E in Operating Permit)**

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

Additionally, the emergency generator is subject to the applicable requirements of 40 CFR Part 63 Subpart ZZZZ. The applicable requirements from PSD 01-05, NOC #1103, and 40 CFR part 63 Subpart ZZZZ are included in this section.

Condition II.E.1: Only natural gas, taken from the GTN GTN pipeline, shall be used to fire the auxiliary generator. [PSD 01-05 Amendment 1, Condition 2, 11/14/02] [NOC #1103, Condition 1, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

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

Condition II.E.2: The auxiliary generator shall not operate for more than 150 hours per year, based on a 12 month rolling total [PSD 01-05 Amendment 1, Condition 3, 11/14/02] [NOC #1103, Condition 18, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

MRRR: GTN is required to install a non-resetable hour meter on the auxiliary generator to measure the hours of generator operation. Monthly records shall be kept of the total hours of operation of the generator, including record of both emergency and non-emergency hours of operation (the emergency and non-emergency operation hours records are required per 40 CFR part 63 Subpart ZZZZ). At the end of each month, the hours of operation during the last twelve-month period shall be totaled. Records of the rolling twelve month hours of operation shall be kept. GTN must submit records of the monthly hours of operation to SRCAA. [PSD 01-05 Amendment 1, Conditions 7 & 8, 11/14/02] [NOC #1103, Conditions 18 & 19, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [WAC 173-401-615(1)&(2), 9/16/02] - NOTE: At least a portion of this MRRR is gapfilling.

Condition II.E.3: NOx emissions from the auxiliary generator shall not exceed 0.48 tons per year, based on a 12 month rolling total. [PSD 01-05 Amendment 1, Condition 5, 11/14/02]

MRRR: GTN is required to install a non-resetable hour meter on the auxiliary generator to measure the hours of generator operation. Monthly records shall be kept of the hours of operation of the generator. At the end of each month, the hours of operation during the last twelve-month period shall be totaled, and the NOx emissions from the generator during the last twelve-month period shall be calculated. The NOx emissions shall be calculated by multiplying the NOx emission rate of the generator at full load by the hours of operation during the last twelve-month period. Records of the rolling twelve month hours of operation and corresponding NOx emissions shall be kept. GTN must submit records of the monthly hours of operation and the corresponding NOx emissions from the generator to SRCAA. [PSD 01-05 Amendment 1, Conditions 7 & 8,

11/14/02] [NOC #1103, Conditions 18 & 19, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [WAC 173-401-615(1)&(2), 9/16/02] NOTE: At least a portion of this MRRR is gapfilling.

Condition II.E.4: The auxiliary generator shall be maintained in good operating condition. [NOC #1103, Condition 15, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

MRRR: NOC #1103 and PSD 01-05 outline the monitoring required for this condition. GTN is required to develop and maintain an operation and maintenance (O&M) plan for the generator. The O&M plan shall identify operational parameters and practices that constitute proper operation of the turbine. Manufacturer emission-related written operation and maintenance instruction may be used for the O&M plan, provided they include the items referenced in a. – d. below. At a minimum, the O&M manual shall include:

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

Once developed, the O&M plan must be followed. Records shall be kept of all maintenance performed on the generator in order to document the O&M plan is being followed. Records shall be kept in accordance with Condition 19M.

[NOC #1103, Conditions 15 & 19, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [PSD 01-05 Amendment 1, Condition 13, 11/14/02]

Condition II.E.5: Visible emissions from the generator exhaust stack shall not exceed 5% opacity during any six-minute average. [NOC #1103, Condition 16, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21]

MRRR: Compliance with this requirement is assured by proper O&M, as outlined in the MRRR associated with Condition II.E.4. In addition, the use of only natural gas should minimize visible emissions from the generator. The generator is designed and operated without add-on controls, so as long as the unit is operating properly, as indicated by proper O&M and burning only natural gas, the opacity should be lower than 5%. [NOC #1103, Conditions 4 & 15, 4/4/02 as revised on 9/11/02, 8/31/07, 3/13/20, and 12/17/21] [PSD 01-05 Amendment 1 & 6, Condition 13, 11/14/02]

Condition II.E.6: The auxiliary generator engine oil and filter must be changed after every 500 hours of operation or annually, whichever comes first. The permittee may utilize



an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the oil change requirement. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6605(a), 8/20/10]

**MRRR:** The monitoring for this federal condition is given in the rule, 40 CFR 63, Subpart ZZZZ. The permittee must develop and follow a maintenance plan for the auxiliary generator engine which provides 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. Manufacturer's emission-related written operation and maintenance instructions may be used for the maintenance plan. Records must be kept of the maintenance conducted on the engine in order to demonstrate that the engine was operated and maintained according to the maintenance plan. The requirements of Conditions 18M (auxiliary generator O&M plan) and 19M (includes auxiliary generator maintenance record keeping requirements) are sufficient for monitoring compliance with this condition. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6625, 63.6655, & 63.6660, 8/20/10]

**Condition II.E.7:** The auxiliary generator engine spark plugs must be inspected every 1,000 hours of operation or annually, whichever comes first. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6605, 8/20/10]

**MRRR:** The monitoring is the same as for Condition II.E.6. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6602, 8/20/10]

**Condition II.E.8:** All hoses and belts on the auxiliary generator engine must be inspected every 500 hours of operation or annually, whichever comes first, and replaced as necessary. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6605, 8/20/10]

**MRRR:** The monitoring is the same as for Condition II.E.6. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6602, 8/20/10]

**Condition II.E.9:** The auxiliary generator engine must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6605, 8/20/10]

**MRRR:** The monitoring is the same as for Condition II.E.6. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6602, 8/20/10]

**Condition II.E.10:** The auxiliary generator engine may be operated for up to 100 hours per year for the purpose of maintenance checks and readiness testing, provided that

the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Note: Condition II.E.2 limits total hours of operation to 150 hours per year, based on a 12 month rolling total. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6640, 8/20/10]

**MRRR:** The monitoring for this federal condition is given in the rule, 40 CFR 63, Subpart ZZZZ. A non-resettable hour meter must be installed on the auxiliary generator engine. Records shall be kept of the hours of operation of the auxiliary generator engine that are recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. The requirements of Conditions 17M (monitoring of auxiliary generator hours of operation) and 19M (includes auxiliary generator hours of operation record keeping requirements) are sufficient for monitoring compliance with this condition [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6625, 63.6655, & 63.6660, 8/20/10]

**Condition II.E.11:** The auxiliary engine may be operated for up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generator income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except as allowed under 40 CFR 63.6640(f)(iii). Note: Condition II.E.2 limits total hours of operation to 150 hours per year, based on a 12 month rolling total. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6640, 8/20/10]

**MRRR:** The monitoring is the same as for Condition II.E.10. [SRCAA Regulation I, Section 2.18(A), 7/9/20, which adopts by reference 40 CFR 63.6625, 63.6655, & 63.6660, 8/20/10]

The following requirements in the NOC and PSD approvals for the auxiliary generator were not included in the permit for the reasons stated.

CITATION	DESCRIPTION	REASON NOT INCLUDED IN PERMIT
PSD 01-05 Amendment 1, Conditions 4, 5, & 11, 11/14/02	Initial source testing requirement	One time requirement at the time of start-up. Source testing was conducted on the generator on August 27-29, 2002. Results from the source test showed compliance with the NOx

CITATION	DESCRIPTION	REASON NOT INCLUDED IN PERMIT
		emission limits.
PSD 01-05 Amendment 1, Condition 12a), 11/14/02	Submit performance test data from the initial performance test	Performance test data from initial performance test was submitted to SRCAA on December 2, 2002 (generator test report).
PSD 01-05 Amendment 1, Condition 17, 11/14/02	Approval becomes void if construction does not begin within 18 months of approval	Construction began within 18 months of approval date
NOC #1103, Condition 1, 4/4/02 as revised on 9/11/02 [note: the start-up notification requirement was removed in subsequent NOC #1103 revisions]	Start-up notification for Solar Titan gas turbine and emergency generator	Start-up notification was provided to SRCAA
NOC #1103, Condition 2, 4/4/02 as revised on 9/11/02 [note: the begin construction timeline requirement was removed in subsequent NOC #1103 revisions]	Approval becomes void if construction does not begin within 18 months of approval	Construction began within 18 months of approval date
NOC #1103, Condition 14, 4/4/02 as revised on 9/11/02 [note: the initial testing requirement was removed in subsequent NOC #1103 revisions]	Initial source testing requirement	One time requirement at the time of start-up. Source testing was conducted on August 27-29, 2002. Results from the source test showed compliance with the applicable emission limits.

**X. PERMIT SHIELD FINDINGS (Section III in Operating Permit)**

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

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

Note that the Table of Contents in the Statement of Basis and associated section numbering does not align with the Table of Contents and associated section numbering in the Operating Permit. This is due to the Statement of Basis including background information (facility description/summary, permitting/compliance history, current/new regulation review, etc.) that is not included in the Operating Permit. However, each cited permit condition is consistent with the condition given in the Operating Permit

## **X.A Requirements For Which a Shield Will Be Granted:**

1PS. Fugitive Emissions Identified as a Significant Contributor to a Nonattainment Area - [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-040(4)(b) and (9)(b) (8/16/18)]

Findings: WAC 173-400-040(4)(b) and (9)(b) apply to any emissions unit which is a source of fugitive emissions that has been identified as a significant contributor to the nonattainment status of a designated nonattainment area. There are no nonattainment areas located in Spokane County, so these sections of the regulation do not apply.

2PS. Emission Standards for Combustion and Incineration Units - [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-050(2), 9/16/18]

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

3PS. Emission Standards for Certain Source Categories - [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-070, 7/1/16]

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

4PS. Registration - [WAC 173-400-100, 1/10/05] [WAC 173-400-101, 3/1/11]

Findings: WAC 173-400-100 and 173-400-101 requires certain air contaminant sources to register with the appropriate air pollution control authority. This registration requirement, while no longer a part of the state regulation, is in the State Implementation Plan and is still a federal requirement. The registration requirement is established pursuant to RCW 70A.15.2200). State law, RCW 70A.15.2260, exempts air operating permit sources from registration programs established pursuant to RCW 70A.15.2200. Because the permittee is an air operating permit source, the rule does not apply.

5PS. Retrofit Requirements for Visibility Protection - [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference WAC 173-400-151, 1/10/05]

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

6PS. Kraft Pulp Mill, Sulfite Pulp Mill, Primary Aluminum Plants - [Chapter 173-405

WAC, 2/19/91] [Chapter 173-410 WAC, 2/19/91] [Chapter 173-415 WAC, 8/23/05]

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

7PS. Agricultural Burning, Solid Fuel Burning Devices, Solid Waste Incinerator Facilities [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference Chapter 173-430 WAC, 11/10/10] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference Chapter 173-433 WAC, 9/6/07] [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference Chapter 173-434 WAC, 12/22/03]

Findings: Chapters 173-430, 173-433, and 173-434 WAC apply to agricultural burning, solid fuel burning devices, and solid waste incinerator facilities, respectively. Since the facility does not engage in agricultural activities, does not contain any solid fuel burning devices, and is not considered a solid waste incinerator facility, these regulations do not apply.

8PS. Ambient Air Quality Standards and Emission Limits for Radionuclides - [Chapter 173-480 WAC, 5/23/07]

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

9PS. State Regulation Establishing Emission Standards for VOC Sources Located in Ozone Nonattainment Areas - [SRCAA Regulation I, Section 2.14(A)(1), 7/9/20, which adopts by reference Chapter 173-490 WAC, 2/2/98]

Findings: Chapter 173-490 WAC, Emission Standards and Control for Sources of VOCs, applies only to areas that have been designated as nonattainment for ozone. In addition the rule only regulates specific categories of VOC sources. Because Spokane County has not been designated as a nonattainment area for ozone, the rule does not apply.

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

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

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

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

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

Findings: This part applies to certain nonferrous smelters. Since the facility does not include

any nonferrous smelters, this regulation does not apply.

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

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

14PS. 40 CFR Part 60 – Standards of Performance for New Stationary Sources - [SRCAA Regulation I, Section 2.16(A)(1), 7/9/20, which adopts by reference 40 CFR Part 60, 2000, but excluding Subpart A, Subpart GG, and Appendices A and B, from the permit shield]

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

15PS. 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants As Listed in Table III.A-1 - [SRCAA Regulation I, Section 2.17(A)(1), 7/9/20, which adopts by reference 40 CFR Part 61, Subparts, as listed in Table III.A-1, 2002]

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

Table III.A-1

SUBPART OF 40 CFR PART 61	SOURCES TO WHICH THE SUBPART APPLIES	FINDINGS
Subpart B	Certain uranium mines	The facility is not the type of source regulated.
Subpart C	Certain plants that process various beryllium compounds including pure beryllium.	The facility is not the type of source regulated.
Subpart D	Rocket motor test sites	The facility is not the type of source regulated.
Subpart E	Stationary sources that process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 61	SOURCES TO WHICH THE SUBPART APPLIES	FINDINGS
	wastewater treatment plant sludge.	
Subpart F	Plants which produce ethylene dichloride by certain processes, produce vinyl chloride, and/or produce polymers containing any fraction of polymerized vinyl chloride.	The facility is not the type of source regulated.
Subpart H	Certain facilities owned or operated by the Department of Energy.	The facility is not the type of source regulated.
Subpart J	Certain equipment intended to operate in benzene service.	The facility is not the type of source regulated.
Subpart K	Calciners and nodulizing kilns at phosphorous plants.	The facility is not the type of source regulated.
Subpart L	Certain sources at furnace and foundry coke by-product recovery plants.	The facility is not the type of source regulated.
Subpart N	Glass melting furnaces using commercial arsenic as a raw material.	The facility is not the type of source regulated.
Subpart O	Copper converter at any new or existing primary copper smelter except as otherwise noted in the rule.	The facility is not the type of source regulated.
Subpart P	Metallic arsenic production plants and arsenic trioxide plants that process low-grade arsenic bearing materials by a roasting condensation process.	The facility is not the type of source regulated.
Subpart Q	Certain storage and disposal facilities for radium-containing material that are owned or operated by the Department of Energy.	The facility is not the type of source regulated.
Subpart T	Owners or operators of sites that are used for the disposal of tailings, and that manage residual radioactive material during and following the processing of uranium ores.	The facility is not the type of source regulated.
Subpart V	Certain sources that are intended to operate in volatile hazardous air pollutant (VHAP) service including control devices required by this subpart.	The facility is not the type of source regulated.
Subpart W	Facilities licensed to manage uranium byproduct materials during and following the processing of uranium ores.	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 61	SOURCES TO WHICH THE SUBPART APPLIES	FINDINGS
Subpart Y	Storage vessels that store benzene with specific gravities as specified in the subpart unless otherwise exempted in the subpart.	The facility is not the type of source regulated.
Subpart BB	Loading racks at which benzene is loaded into a transport vehicle at a benzene production facility or bulk terminal unless otherwise exempted in the subpart.	The facility is not the type of source regulated.
Subpart FF	Owners and operators of chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries. Also, hazardous waste treatment, storage and disposal facilities that treat, store, or dispose of hazardous waste generated by chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries.	The facility is not the type of source regulated.

16PS. 40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants As Listed in Table III.A-2 - [SRCAA Regulation I, Section 2.184(A), 7/9/20, which adopts by reference 40 CFR Part 63, Subparts as listed in Table III.A-2, 2013]

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

Table III.A-2

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subparts F, G, H, & J	Certain chemical manufacturing plants as specified in the rule.	The facility is not the type of source regulated.
Subpart I	Certain chemical manufacturers as specified in the rule.	The facility is not the type of source regulated.
Subpart L	By-product and nonrecovery coke oven batteries at coke plants.	The facility is not the type of source regulated.
Subpart M	Dry cleaning facilities which use perchloroethylene.	The facility is not the type of source regulated.



SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subpart N	Hard chromium electroplating, decorative chrome electroplating, and chromium anodizing.	The facility is not the type of source regulated.
Subpart O	Sterilization facilities except as otherwise exempted under the rule.	The facility is not the type of source regulated.
Subpart Q	Certain industrial process cooling towers using chromium based water treatment chemicals.	The facility is not the type of source regulated.
Subpart R	Certain bulk gasoline terminals and pipeline breakout stations. (The term pipeline refers to gasoline pipelines.)	The facility is not the type of source regulated.
Subpart S	Processes that produce pulp, paper, or paperboard	The facility is not the type of source regulated.
Subpart T	Certain solvent cleaning machines using solvents listed in the rule.	The facility is not the type of source regulated.
Subpart U	Certain elastomer product process units including wastewater streams and wastewater operations associated with the elastomer product process unit(s).	The facility is not the type of source regulated.
Subpart W	Certain manufacturers of basic liquid epoxy resins and wet strength resins.	The facility is not the type of source regulated.
Subpart X	Certain sources at secondary lead smelters.	The facility is not the type of source regulated.
Subpart Y	Affected sources as defined in the rule. (Source(s) means any location where at least one dock or loading berth is bulk loading onto marine tank vessels, except offshore drilling platforms and lightering operations.)	The facility is not the type of source regulated.
Subpart AA	Phosphoric acid manufacturing plants	The facility is not the type of source regulated.
Subpart BB	Phosphate fertilizer production plants	The facility is not the type of source regulated.
Subpart CC	Petroleum refining process units and related emission points (as specified in the rule) that are at the plant site.	The facility is not the type of source regulated.
Subpart DD	Major sources of hazardous air pollutant that receives off-site materials and operates a waste management or recovery operation	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
	listed in the rule.	
Subpart EE	Certain magnetic tape manufacturing operations.	The facility is not the type of source regulated.
Subpart GG	Major sources of hazardous air pollutants which manufacture or rework aerospace vehicles or components.	The facility is not the type of source regulated.
Subpart HH	Oil and natural gas production facilities	The facility is not the type of source regulated.
Subpart II	Major sources of hazardous air pollutants which build or repair ships.	The facility is not the type of source regulated.
Subpart JJ	Major sources of hazardous air pollutants that manufacture wood furniture or wood furniture components.	The facility is not the type of source regulated.
Subpart KK	Major source of hazardous air pollutants at which certain printing presses are operated.	The facility is not the type of source regulated.
Subpart LL	Primary aluminum reduction plants	The facility is not the type of source regulated.
Subpart MM	Chemical recovery combustion sources at various pulp mills	The facility is not the type of source regulated.
Subpart OO	Certain tanks for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart PP	Certain containers for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart QQ	Certain surface impoundments for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart RR	Certain individual drain systems for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart SS	Closed vent systems, control devices, recovery devices, and routing to a fuel gas system or a process for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
	subpart.	
Subpart TT and UU	Equipment leaks for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart	The facility is not the type of source regulated.
Subpart VV	Certain oil-water separators and organic-water separators for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart WW	Certain storage vessels for which another subpart of 40 CFR Part 60, 61, or 63 references the use of this subpart.	The facility is not the type of source regulated.
Subpart XX	Heat exchange systems and waste streams at new and existing ethylene production units.	The facility is not the type of source regulated.
Subpart YY	Source categories and affected sources specified in § 63.1103(a) through (h).	The facility is not the type of source regulated.
Subpart CCC	HCl process facilities and hydrochloric acid regeneration plants.	The facility is not the type of source regulated.
Subpart DDD	Mineral wool production facilities.	The facility is not the type of source regulated.
Subpart EEE	Hazardous waste combustors.	The facility is not the type of source regulated.
Subpart GGG	Pharmaceuticals production facilities.	The facility is not the type of source regulated.
Subpart HHH	Major sources of hazardous air pollutants that are natural gas transmission and storage facilities	Since the facility is not a major source of hazardous air pollutants, Subpart HHH does not apply.
Subpart III	Flexible polyurethane foam production facilities	The facility is not the type of source regulated.
Subpart JJJ	Certain thermoplastic product process units.	The facility is not the type of source regulated.
Subpart LLL	Portland cement manufacturing industry	The facility is not the type of source regulated.
Subpart MMM	Pesticide active ingredient production	The facility is not the type of source regulated.
Subpart NNN	Wool fiberglass manufacturing facilities	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subpart OOO	Manufacture of amino/phenolic resins	The facility is not the type of source regulated.
Subpart PPP	Polyether polyols production	The facility is not the type of source regulated.
Subpart QQQ	Primary copper smelters	The facility is not the type of source regulated.
Subpart RRR	Secondary aluminum production	The facility is not the type of source regulated.
Subpart TTT	Primary lead smelting	The facility is not the type of source regulated.
Subpart UUU	Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units at Petroleum Refineries	The facility is not the type of source regulated.
Subpart VVV	Major sources of hazardous air pollutants that are publicly owned treatment works	The facility is not the type of source regulated.
Subpart XXX	Ferroalloys production	The facility is not the type of source regulated.
Subpart AAAA	Municipal solid waste (MSW) landfills	The facility is not the type of source regulated.
Subpart CCCC	Manufacturing of nutritional yeast	The facility is not the type of source regulated.
Subpart DDDD	Facilities that manufacture plywood and/or composite wood products	The facility is not the type of source regulated.
Subpart EEEE	Organic liquids distribution (OLD) (non-gasoline) operations	The facility is not the type of source regulated.
Subpart FFFF	Miscellaneous organic chemical manufacturing process units (MCPU)	The facility is not the type of source regulated.
Subpart GGGG	Solvent extraction for vegetable oil production	The facility is not the type of source regulated.
Subpart HHHH	Wet-formed fiberglass mat production	The facility is not the type of source regulated.
Subpart IIII	Facilities which surface coat new automobiles/ new light-duty truck bodies or body parts	The facility is not the type of source regulated.
Subpart JJJJ	Facilities at which web coating lines are operated.	The facility is not the type of source regulated.
Subpart KKKK	Metal can surface coating facilities	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
Subpart MMMM	Miscellaneous metal parts and products surface coating facilities	The facility is not the type of source regulated.
Subpart NNNN	Facilities that apply coatings to large appliance parts or products	The facility is not the type of source regulated.
Subpart OOOO	Fabric and other textiles printing, coating and dyeing operations	The facility is not the type of source regulated.
Subpart PPPP	Plastic parts and products surface coating facilities	The facility is not the type of source regulated.
Subpart QQQQ	Wood building products surface coating sources	The facility is not the type of source regulated.
Subpart RRRR	Metal furniture surface coating facilities	The facility is not the type of source regulated.
Subpart SSSS	Facilities that performs metal coil surface coating operations	The facility is not the type of source regulated.
Subpart TTTT	Leather finishing operations	The facility is not the type of source regulated.
Subpart UUUU	Cellulose products manufacturing operations	The facility is not the type of source regulated.
Subpart VVVV	Boat manufacturing	The facility is not the type of source regulated.
Subpart WWWW	Reinforced plastic composites production	The facility is not the type of source regulated.
Subpart YYYY	Stationary combustion turbines	The facility is not the type of source regulated.
Subpart XXXX	Rubber tire manufacturing facility	The facility is not the type of source regulated.
Subpart AAAAA	Lime manufacturing plants.	The facility is not the type of source regulated.
Subpart BBBBB	Semiconductor manufacturing facilities	The facility is not the type of source regulated.
Subpart CCCCC	Pushing, soaking, quenching, and battery stacks at coke oven batteries at coke plants	The facility is not the type of source regulated.
Subpart DDDDD	Industrial, commercial, and institutional boilers and process heaters	The facility is not the type of source regulated.
Subpart EEEEE	Iron and steel foundries	The facility is not the type of source regulated.
Subpart FFFFF	Integrated iron and steel	The facility is not the type of source regulated.

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
	manufacturing facilities	regulated.
Subpart GGGGG	Site remediation activities	The facility is not the type of source regulated.
Subpart HHHHH	Miscellaneous coating manufacturing	The facility is not the type of source regulated.
Subpart IIIII	Mercury cell chlor-alkali plants	The facility is not the type of source regulated.
Subpart JJJJJ	Brick and structural clay products (BSCP) manufacturing facilities	The facility is not the type of source regulated.
Subpart KKKKK	Clay ceramics manufacturing facilities	The facility is not the type of source regulated.
Subpart LLLLL	Asphalt processing and asphalt roofing manufacturing facilities	The facility is not the type of source regulated.
Subpart MMMMM	Flexible polyurethane foam fabrication operations	The facility is not the type of source regulated.
Subpart NNNNN	Hydrochloric acid (HCl) production	The facility is not the type of source regulated.
Subpart PTTTT	Engine test cells/stands	The facility is not the type of source regulated.
Subpart QQQQQ	Friction materials manufacturing facility	The facility is not the type of source regulated.
Subpart RRRRR	Taconite iron ore processing	The facility is not the type of source regulated.
Subpart SSSSS	Refractory products manufacturing facilities	The facility is not the type of source regulated.
Subpart TTTTT	Primary magnesium refineries	The facility is not the type of source regulated.
Subpart WWWW	Ethylene oxide sterilization facilities	The facility is not the type of source regulated.
Subpart YYYYY	Electric arc furnace (EAF) steelmaking facilities	The facility is not the type of source regulated.
Subpart ZZZZ	Iron and steel foundries	The facility is not the type of source regulated.
Subpart BBBB	Area source gasoline distribution bulk terminals, bulk plants, and pipeline facilities	The facility is not the type of source regulated.
Subpart CCCCC	Gasoline dispensing facilities	The facility is not the type of source regulated.
Subpart DDDDD	Plants specified in § 40 CFR 61.61(c)	The facility is not the type of source

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
	that produces polyvinyl chloride (PVC)	regulated.
Subpart EEEEEEE	Primary copper smelters	The facility is not the type of source regulated.
Subpart FFFFFFF	Secondary copper smelters	The facility is not the type of source regulated.
Subpart GGGGGG	Primary zinc production facility or primary beryllium production facilities	The facility is not the type of source regulated.
Subpart HHHHHH	Paint stripping operations, autobody refinishing operations, spray application of coatings containing target HAPs	The facility is not the type of source regulated.
Subpart JJJJJJ	Industrial, commercial, or institutional boilers	The facility is not the type of source regulated.
Subpart LLLLLL	Acrylic or modacrylic fibers production plants	The facility is not the type of source regulated.
Subpart MMMMMM	Carbon black production facilities	The facility is not the type of source regulated.
Subpart NNNNNN	Chromium compounds manufacturing facilities	The facility is not the type of source regulated.
Subpart OOOOOO	Flexible polyurethane foam production and fabrication facilities and rebond foam production facilities	The facility is not the type of source regulated.
Subpart PPPPPP	Lead acid battery manufacturing plants	The facility is not the type of source regulated.
Subpart QQQQQQ	Wood preserving operations	The facility is not the type of source regulated.
Subpart RRRRRR	Clay ceramics manufacturing facilities	The facility is not the type of source regulated.
Subpart SSSSSS	Glass manufacturing facilities	The facility is not the type of source regulated.
Subpart TTTTTT	Secondary nonferrous metals processing facilities	The facility is not the type of source regulated.
Subpart VVVVVV	Chemical manufacturing process units	The facility is not the type of source regulated.
Subpart WWWWWW	Plating and polishing facilities	The facility is not the type of source regulated.
Subpart XXXXXX	Specified metal fabrication and finishing source categories	The facility is not the type of source regulated.
Subpart YYYYYY	Ferrous alloys production facilities	The facility is not the type of source

SUBPART OF 40 CFR PART 63	APPLICABLE FACILITIES	FINDINGS
		regulated.
Subpart ZZZZZZ	Aluminum, copper, or other nonferrous foundries	The facility is not the type of source regulated.
Subpart AAAAAAA	Asphalt processing operations and/or asphalt roofing manufacturing operations	The facility is not the type of source regulated.
Subpart BBBBbbb	Chemical preparations facilities	The facility is not the type of source regulated.
Subpart CCCCCCC	Facilities that perform paints and allied products manufacturing	The facility is not the type of source regulated.
Subpart DDDDDDD	Prepared feeds manufacturing facilities	The facility is not the type of source regulated.
Subpart EEEEEEE	Gold mine ore processing and production facilities	The facility is not the type of source regulated.

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

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

18PS. 40 CFR Part 72 - Permits Regulation - [40 CFR Part 72, 2002]

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

19PS. 40 CFR Part 75 - Continuous Emission Monitoring - [40 CFR Part 75, 2002]

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

20PS. 40 CFR Part 76 - Acid Rain Nitrogen Oxides Emission Reduction Program - [40 CFR Part 76, 2002]

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

21PS. 40 CFR Part 77 - Excess Emissions - [40 CFR Part 77, 2002]

Findings: This part sets forth the excess emissions offset planning and offset penalty



requirements for owners and operators of affected units under the Acid Rain Program. GTN does not have any affected units at this site.

22PS. 40 CFR Parts 79 and 80 - [40 CFR Part 79 and 80, 2002]

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

23PS. 40 CFR Part 82 - Protection of Stratospheric Ozone As Listed in Table III.A-3 - [40 CFR Part 82, Subparts as listed in Table III.A-3, 2002]

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

Table III.A-3

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

24PS. Incinerator Burning and Incinerator Hours - [SRCAA Regulation I, Section 6.03, 7/9/20]

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

25PS. Agricultural Burning - [SRCAA Regulation I, Section 6.11, 7/9/20]

Findings: This regulation applies to agricultural burning in Spokane County. Since GTN does

not engage in agricultural burning, this regulation does not apply.

26PS. General Surface Coating - [SRCAA Regulation I, Section 6.13, 5/6/21]

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

27PS. Standards for Control of Particulate Matter on Paved and Unpaved Roads - [SRCAA Regulation I, Sections 6.14 & 6.15, 7/9/20]

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

28PS. Solid Fuel Burning Device Standards - [SRCAA Regulation I, Article VIII, 9/2/14]

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

29PS. Solid Fuel Burning Device Exemption Fees - [SRCAA Regulation I, Section 10.10, 10/7/10]

Findings: SRCAA Regulation I, Sections 10.10 contains fee schedules for solid fuel burning device exemptions in Spokane County. Since GTN does not operate any solid fuel burning devices, these regulations do not apply.

**X.B Requirements For Which a Shield Will Not Be Granted**

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

1.03, SRCAA Regulation I, Section 1.04, SRCAA Regulation I, Section 4.03, SRCAA Regulation I, Section 6.09, SRCAA Regulation I, Section 10.01, SRCAA Regulation I, Section 10.03, SRCAA Regulation I, Section 10.04]

Note: SRCAA Regulation I, Section 2.148(A)(1), 7/9/20, has adopted the WACs marked with a \* by reference.

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

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

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

[SRCAA Regulation I, Section 2.14(A)(1) which adopts by reference WAC 173-400-060]

Findings: WAC 173-400-060 contains a 0.1 gr/dscf grain loading limit that all general process units are required to meet. WAC 173-400-060 applies to all emission units at the facility and is contained in Condition II.A.9 of this permit. Therefore, SRCAA cannot grant a permit shield for this requirement.

[SRCAA Regulation I, Section 2.14(A)(1) which adopts by reference WAC 173-400-105]

Findings: WAC 173-400-105 contains requirements related to records, monitoring, and reporting. WAC 173-400-105(1) requires that an annual emission inventory be submitted to SRCAA and is contained in Condition I.D.8 of this permit. Therefore, SRCAA cannot grant a permit shield for this requirement.

[SRCAA Regulation I, Section 2.14(A)(1) which adopts by reference WAC 173-400-107]

Findings: WAC 173-400-107 contains provisions and criteria related to unavoidable excess emissions. The provisions of WAC 173-400-107 are contained in Condition I.C.2 of this permit. Therefore, SRCAA cannot grant a permit shield for this requirement.

[WAC 173-400-110] SRCAA Regulation I, Section 2.14(A)(1) which adopts by reference [WACs 174-400 -112, -113, and -114.] [WAC 173-400-141] [Chapter 173-460 WAC] [SRCAA Regulation I, Article V]

Findings: WAC 173-400-110, 112, 113, 114, & 141, Chapter 173-460 WAC, and SRCAA Regulation I, Article V contain new source review requirements. Prior to the establishment of a new source, including modifications, the permittee may be required to file for and obtain

approval under SRCAA's Notice of Construction program. The requirements of WAC 173-400-110, 112, 113, & 114, Chapter 173-460 WAC, and SRCAA Regulation I, Article V are contained in Conditions I.G.1 and I.G.2 of this permit and are applicable when triggered. Therefore, SRCAA cannot grant a shield for these requirements.

[SRCAA Regulation I, Section 2.14(A)(2) which adopts by reference Chapter 173-401 WAC]

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

[SRCAA Regulation I, Section 2.14(A)(11) which adopts by reference Chapter 173-491 WAC]

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

[40 CFR Part 68 - Chemical Accident Prevention Provisions]

Findings: This part sets forth requirements for the prevention of accidental releases for owners or operators of stationary sources (as defined in the rule) that have more than a threshold quantity of a regulated substance. GTN does not currently use or store more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR §68.130. However, in the event that GTN does exceed the applicable threshold quantities, the applicable requirements of the Chemical Accident Prevention Provisions at 40 CFR Part 68 could potentially become effective during the term of the permit. Therefore, SRCAA cannot grant a permit shield for 40 CFR Part 68.

[40 CFR Part 71]

Findings: 40 CFR Part 71 contains the federal air operating permit program. Currently, Washington state has a delegated air operating permit program, which operates under the provisions of Chapter 173-401 WAC. However, according to 40 CFR 71.4, EPA will administer and enforce an operating permits program for a permitting authority if EPA determines that a permitting authority is not adequately administering or enforcing its approved operating permits program, or any portion thereof, and the permitting authority fails to do either of the following: (i) Correct the deficiencies within 18 months after the Administrator issues the notice; or (ii) Take significant action to assure adequate administration and enforcement of the program within 90

days of the EPA notice. Although Part 71 is not applicable currently, it could potentially become effective during the term of the permit. Therefore, SRCAA cannot grant a permit shield for 40 CFR Part 71.

[SRCAA Regulation I, Article II]

Findings: SRCAA Regulation I, Article II contains general provisions that apply to all sources in Spokane County. Many of the general provisions are contained or cited in the Standard Terms & Conditions section of the permit (e.g., Conditions I.B.1, I.B.2, I.C.3). Therefore, a permit shield from the provisions of SRCAA Regulation I, Article II is not appropriate.

[SRCAA Regulation I, Article IX]

Findings: SRCAA Regulation I, Article IX contains requirements to control asbestos emissions from asbestos removal and demolition projects. While GTN does not use asbestos in the process or equipment, there may be asbestos in any of the buildings on-site. If GTN does any demolition or renovation projects at the facility, the requirements of SRCAA Regulation I, Article IX will be triggered. SRCAA cannot grant a permit shield for this requirement. The requirements of SRCAA Regulation I, Article IX are contained in Condition I.G.3 of this permit and are applicable when triggered.

[SRCAA Regulation I, Sections 10.07 and 10.09]

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

**X.I STAFF REVIEWERS SIGNATURES**

PREPARED BY: \_\_\_\_\_  
Joe Southwell

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

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

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

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

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Scott Windsor, Control Officer

DATE: