

Request for Comments

Proposed Renewal of Title V Air Operating Permit for Gas Transmission Northwest Corporation, Compressor Station #11



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The purpose of this notice is to invite you to provide written comments on this proposed air quality permit renewal.

DEQ's Role:

The Oregon Department of Environmental Quality (DEQ) is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, and for managing the proper disposal of hazardous and solid wastes. One way DEQ does this is by requiring permits for certain activities. DEQ issues permits to regulate the type and amount of air emissions at a regulated facility.

Comments due:

Written comments due: 5 p.m.

February 17, 2010

Where can I send my comments?

Nancy Swofford, Permit Coordinator
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
(541) 633-2021 or Toll Free: 866-863-6668
Fax: (541) 388-8283
Email: [Nancy Swofford](mailto:Nancy.Swofford@deq.state.or.us)

Where can I get technical information?

Walt West, P.E., Permit Writer
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
(541) 633-2020 or Toll Free: 866-863-6668
Fax: (541) 388-8283
Email: [Walt West](mailto:Walt.West@deq.state.or.us)

Where can I get background information?

You can review electronic versions of the draft permit and review report by clicking on the links below:

[Draft Permit](#)
[Review Report](#)

You can review hard copies of the draft permit and related documents at the Jefferson County Library District located at 241 SE 7th Street in Madras and the DEQ office in Bend. For a

review appointment, call Nancy Swofford at (541) 633-2021.

What is proposed?

DEQ proposes to renew an air permit for Gas Transmission Northwest Corp., (GTN) Compressor Station #11 and is inviting public comment on the proposed permitting action. During the comment period the public is invited to make comments related to specific conditions within the proposed permit.

The permittee is not proposing changes to the emission limits in the renewal permit.

Permit expiration

Oregon law requires facilities with a Title V Permit to renew that permit every five years. Upon renewal, this permit will be effective for five years from date of issuance.

Who is the applicant?

Gas Transmission Northwest Corporation (GTN)
534 E Spokane Falls Blvd., Suite 100
Spokane, WA 99202

Where is the facility located?

Compressor Station #11
Oregon Hwy. 26,
12 miles south of Madras, Oregon

This source is located within 100 kilometers (62 miles) of three Class I air quality protection areas: Mt. Jefferson, Mt. Washington and The Three Sisters Wilderness Areas.

Who might have an interest?

People who work, live, and recreate in the area.

What does Gas Transmission Northwest Corp., (GTN) Compressor Station #11 do that affects air quality?

GTN is a natural gas transmission company operating a pipeline from the Canadian border through the states of Idaho, Washington, and Oregon to California. GTN's dual mainline is 612.5 miles in length and includes 638.9 miles of 36-inch and 589.4 miles of 42-inch pipeline. Energy to move the gas is provided by 12

Eastern Region Air Quality

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www.oregon.gov/DEQ

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By: Nancy Swofford

compressor stations located along the pipeline all of which are designed for remote, unattended operation from GTN's Gas Control Center in Portland.

Gas Transmission Northwest Corp. releases Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxide (NOx), Sulfur Dioxide (SO2), Volatile Organic Compounds (VOC), Hazardous Air Pollutants, etc. to the air.

What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 218 give DEQ the authority to issue permits. OAR Chapter 340 Divisions 200 through 268 contains all pertinent rules that govern the air quality program.

This facility is subject to subpart GG-Standards of Performance for Stationary Gas Turbines of the federal New Source Performance Standards, NSPS (40 CFR Part 60).

How does DEQ determine what requirements go in the permit?

Various federal and state regulations apply to a facility depending on the type of industry, the type and amount of pollutants emitted, and the location of the facility. All applicable regulations must be contained in the permit, including the appropriate recordkeeping, monitoring, and reporting requirements to ensure compliance with these rules.

Meeting air quality standards

This source is located in an area that is in attainment for all pollutants.

Air quality in Jefferson County meets the National Ambient Air Quality Standards (NAAQS) established by the US Environmental Protection Agency (EPA) to protect public health. DEQ has determined that the air emissions from Gas Transmission Northwest Corp., (GTN) Compressor Station #11 will not result in a violation of those standards. DEQ is responsible for establishing permit emissions limits that ensure air quality standards are not violated.

What pollutants are considered in determining permitted limits?

EPA and DEQ use six key pollutants as indicators of air quality. These are known as "criteria pollutants" and are compounds that, if inhaled, may lead to health effects that generally aggravate cardiovascular and respiratory disease. If the amount of criteria pollutants emitted is greater than a regulated minimum, then emission limits are established.

Hazardous air pollutants (HAPs) are compounds that, if inhaled, may pose a threat of adverse human health or environmental effects, including, for example, acute or chronic toxicity, cancer, birth defects, or reproductive dysfunction. The mere presence of these pollutants in the air does not necessarily mean that a health risk exists. EPA has established a list of 187 compounds that are classified and regulated as HAPs. If the amount of HAPs released is greater than a regulated minimum level, then additional requirements may also apply.

For more information about criteria pollutants, go to:

[Air Quality Annual Report and Data Summaries](#)

For more information about hazardous air pollutants, go to:

[Health Effects Notebook for Hazardous Air Pollutants \(US EPA\)](#)

How are the permitted substances measured?

This facility is required to keep annual records of natural gas combusted in turbines, greenhouse gas emissions and criteria pollutant emissions. Formulas to calculate emissions are contained in the permit. The permittee is required to calculate facility-wide emissions and submit an emissions report semi-annually. Onsite inspections will be conducted to assure compliance with emission limitations.

Emissions and permit limits

Table 1 below presents the maximum allowable emissions for the facility. The Current Emission Limit reflects the maximum amount of emissions the facility can currently emit under their existing permit. The Proposed Emission Limit reflects the maximum amount of emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than the maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

This facility does not have the potential to be a major source of HAPs. In addition, EPA has determined that these types of sources do not warrant regulation for HAPs. In the past calendar year, Gas Transmission Northwest Corp., (GTN) Compressor Station #11 estimated total HAP emissions of 1.1485 tons per year and 0.7937 tons per year of formaldehyde.



Compliance history:

The facility was inspected in Sept. 2005, Sept. 2007 and June 2009 and was found to be in compliance with all permit conditions.

What other DEQ permits are required?

No other permits are required for this facility by the Department.

What other sources of air pollutants are in the vicinity of the facility?

Various sources emit similar air pollutants. EPA and DEQ split up the sources into 3 categories: point, area, and mobile sources. Point sources are primarily large industrial facilities. Area sources are smaller than point sources and include backyard burning, woodstoves, consumer products, gasoline stations, etc. Mobile sources include cars, trucks, airplanes, ships, railroads, and construction equipment.

What other information about this company is related to this permit?

None

What happens next?

DEQ will schedule a public hearing if one is requested by 10 or more people, or by an authorized person representing an organization of at least 10 people. An additional public notice will be published to advertise the public hearing.

If a public hearing is not requested, DEQ will consider and provide responses to all comments received at the close of the comment period. DEQ may modify provisions in the proposed permit, but the permit writers can only modify

conditions of the permit in accordance with the rules and statutes under the authority of DEQ. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes. Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's air quality permit following EPA review.

After the public comment period, DEQ will send the proposed permit to EPA. EPA will have 45 days to review the proposed permit and submit any objections to DEQ in writing. If EPA has no formal objections, any person may petition EPA with an objection during the following 60 days. A petition may only be based on objections already raised during the public comment period, unless the person submitting the petition can demonstrate it was impossible or impractical to do so, or that new information is now available to justify a new objection.

Accessibility information

DEQ is committed to accommodating people with disabilities. Please notify DEQ of any special physical or language accommodations or if you need information in large print, Braille or another format. To make these arrangements, contact DEQ Communications & Outreach (503) 229-5696 or toll free in Oregon at (800) 452-4011; fax to (503) 229-6762; or e-mail to deqinfo@deq.state.or.us.

People with hearing impairments may call the Oregon Telecommunications Relay Service at 800-735-2900.

Table 1

Criteria Pollutant	Current Limit (tons/vr)	Proposed Limit (tons/vr)
Particulate Matter (PM)	24	24
Small Particulate Matter (PM ₁₀)	14	14
Nitrogen Oxides (NO _x)	150	150
Sulfur Dioxide (SO ₂)	39	39
Carbon Monoxide (CO)	110	110
Volatile Organic Compounds (VOC)	39	39