



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor  
Toni Hardesty, Director

June 21, 2005

**Certified Mail No. 7000 1670 0013 8128 5894**

Greg Hall  
Idaho Power Company  
1221 West Idaho Street  
Boise, ID 83707

RE: Facility ID No. 039-00025, Idaho Power Company, Mountain Home  
Final Permit Letter

Dear Mr. Hall:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050002 to the Idaho Power Company for the Bennett Mountain Power Plant in Mountain Home, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is effective immediately and replaces PTC No. P-030060, issued March 19, 2004, the terms and conditions of which shall no longer apply. This permit does not release the Idaho Power Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact June Ramsdell of the Boise Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

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

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/CM/sd  
Enclosures

Permit No. P-050002



**Air Quality  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** P-050002

**FACILITY ID No.:** 039-00025

**AQCR:** 63

**CLASS:** A

**SIC:** 4911

**ZONE:** 11

**UTM COORDINATE (km):** 608.4 , 4777.7

**1. PERMITTEE**

Idaho Power Company

**2. PROJECT**

Bennett Mountain Power Plant – Change of ownership and permit revision

**3. MAILING ADDRESS**

1221 West Idaho Street

**CITY**

Boise

**STATE**

Idaho

**ZIP**

83702

**4. FACILITY CONTACT**

Greg Hall

**TITLE**

Mechanical Engineer

**TELEPHONE**

208-388-2506

**5. RESPONSIBLE OFFICIAL**

Darwin Pugmire

**TITLE**

General Mngr, Power Production

**TELEPHONE**

208-388-2553

**6. EXACT PLANT LOCATION**

Approximately ½ mile northwest of intersection of Interstate 84 and Highway 20

**COUNTY**

Elmore

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Electric power generation

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

  
TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** June 21, 2005

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## Acronyms, Units, and Chemical Nomenclature

|                  |  |
|------------------|--|
| AQCR             | Air Quality Control Region   |
| CEMS             | Continuous Emissions Monitoring System   |
| CFR              | Code of Federal Regulations  |
| CO               | carbon monoxide  |
| CO <sub>2</sub>  | carbon dioxide   |
| DEQ              | Idaho Department of Environmental Quality  |
| dscf             | dry standard cubic feet  |
| EPA              | U.S. Environmental Protection Agency   |
| gr               | grain (1 lb = 7,000 grains)  |
| HAPs             | hazardous air pollutants   |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km               | kilometer  |
| lb/MMBtu         | pounds per million British thermal units   |
| lb/hr            | pound per hour   |
| MMBtu            | million British thermal units  |
| MW               | megawatt   |
| NO <sub>x</sub>  | nitrogen oxides  |
| NSPS             | New Source Performance Standards   |
| PM               | particulate matter   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| ppmv             | parts per million by volume  |
| PTC              | permit to construct  |
| RATA             | Relative Accuracy Test Audit   |
| SIC              | Standard Industrial Classification   |
| SO <sub>2</sub>  | sulfur dioxide   |
| TAPs             | toxic air pollutants   |
| T/yr             | tons per year  |
| UTM              | Universal Transverse Mercator  |
| VOC              | volatile organic compound  |

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050002**

|   |                                  |                                   |
|---|----------------------------------|-----------------------------------|
| <b>Permittee:</b> Idaho Power – Bennett Mountain<br>Power Plant | <b>Facility ID No.</b> 039-00025 | <b>Date Issued:</b> June 21, 2005 |
| <b>Location:</b> Mountain Home, Idaho                           |                                  |                                   |

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

The purpose of this PTC revision is to establish new ownership of the facility, as well as update the PTC to reflect changes in 40 CFR 60, Subpart GG: Standards of Performance for Stationary Gas Turbines.

This PTC revises PTC No. P-030060, issued March 19, 2004, the terms and conditions of which shall no longer apply.

***Regulated Sources***

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

**Table 1.1 REGULATED EMISSIONS SOURCES**

| <b>Permit Section</b> | <b>Source Description</b>                        | <b>Emissions Control(s)</b>        |
|-----------------------|--|------------------------------------|
| 2                     | Facility-wide                                    | n/a                                |
| 3                     | One Siemens Westinghouse 501F Combustion Turbine | Dry Low NO <sub>x</sub> combustors |
| 4                     | One fuel heater                                  | None                               |

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| <b>Location:</b> Mountain Home, Idaho                        |                                  |                                   |

**2. FACILITY-WIDE CONDITIONS**

The following requirements generally apply to all emissions units and/or sources at the facility.

***Emissions Limits/Operating Requirements***

**2.1 Reasonable Control of Fugitive Emissions**

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

**2.2 Opacity Limit**

The permittee shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which exceeds 20% opacity, as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

**2.3 Odorous Emissions Standard**

Odorous gases shall not be emitted to the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.776.01.

**2.4 Air Pollution Emergency Rule**

The permittee shall comply with the *Air Pollution Emergency Rule* in IDAPA 58.01.01.550-562.

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| <b>Location:</b> Mountain Home, Idaho                           |                                  |                                   |

***Monitoring and Recordkeeping Requirements***

**2.5 Fugitive Emissions Monitoring Requirement**

- 2.5.1** The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive dust.
- 2.5.2** The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

***Reporting Requirements***

**2.6 Excess Emissions**

The permittee shall submit a report of any and all exceedances of any emission rate, visible emission, or operating requirement listed in the emissions limits and operating requirements sections of this permit to DEQ in accordance with IDAPA 58.01.01.130-136.

**2.7 Reports and Certifications**

All periodic reports and certifications required by this permit shall be submitted to DEQ within 60 days of the end of each specified reporting period unless specified otherwise in this permit. Excess emissions reports and notifications shall be submitted in accordance with Permit Condition 2.6. Reports, certifications and notifications shall be submitted to the following:

Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N Orchard St.  
Boise, ID 83706-2239  
Telephone: (208) 373-0550  
Facsimile: (208) 373-0287

In accordance with 40 CFR 60.4, all requests, reports, applications, submittals, and other communications to the U.S. Environmental Protection Agency (EPA) Administrator pursuant to 40 CFR 60, New Source Performance Standards (NSPS) shall be submitted in duplicate to EPA Region 10 to the attention of the Director of the Office of Air Quality at the following address. Copies of all information required to be submitted to EPA for applicable NSPS requirements, shall also be submitted to DEQ at the preceding address.

EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Ave.  
Seattle, WA 98101

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050002**

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| <b>Location:</b> Mountain Home, Idaho                           |                                  |                                   |

**2.8 Permit Application Requirements**

- 2.8.1 The permittee shall submit a complete application to DEQ for an initial Tier I operating permit within 12 months of operational startup of the combustion turbine.
- 2.8.2 The permittee shall comply with the Acid Rain permit application requirements in accordance with 40 CFR 72.9(a) and 40 CFR Part 72, Subpart C.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050002**

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| <b>Location:</b> Mountain Home, Idaho                        |                                  |                                   |

**3. EMISSIONS UNIT NO. 1 – ONE COMBUSTION TURBINE**

**3.1 Process Description**

The primary purpose of the 170-megawatt (MW) combustion turbine will be electric power generation to meet peak system load requirements.

**3.2 Emissions Control Description**

Emissions from the combustion turbine are controlled by Dry Low NO<sub>x</sub> combustors.

**Table 3.1 COMBUSTION TURBINE DESCRIPTION**

| Emissions Unit(s) / Process(es)                         | Emissions Control Device           | Emissions Point |
|---|------------------------------------|-----------------|
| One 170 MW Siemens Westinghouse 501F Combustion Turbine | Dry Low NO <sub>x</sub> combustors | Turbine stack   |

***Emissions Limits***

**3.3 Nitrogen Oxides Emissions Standard – New Source Performance Standard**

On and after the date that performance test required by Permit Condition 3.14 is completed, the permittee shall not discharge into the atmosphere from the combustion turbine, any gases that contain nitrogen oxides (NO<sub>x</sub>) in excess of:

$$STD = 0.0075 \frac{(14.4)}{Y} + F$$

where: STD = allowable NO<sub>x</sub> emissions (percent by volume at 15% oxygen and on a dry basis)

Y = manufacturer's rated heat rate at manufacturer's rated load (kilojoules per watt hour) or, actual, measured heat rate based on lower heating value of fuel as measured as actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour.

F = NO<sub>x</sub> emissions allowance for fuel-bound nitrogen as defined in 40 CFR 60.332(a)(3).

**3.4 Criteria Pollutant Emissions Limits**

Emissions of NO<sub>x</sub> and carbon monoxide (CO) from the combustion turbine stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

**Table 3.2 COMBUSTION TURBINE EMISSIONS LIMITS\***

| Source Description | NO <sub>x</sub> | CO     |
|--------------------|-----------------|--------|
|                    | T/yr            | T/yr   |
| Combustion Turbine | 248.16          | 248.29 |

\*The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

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| <b>Location:</b> Mountain Home, Idaho                        |                                  |                                   |

**3.5 Fuel Burning Equipment Emissions Standard**

Emissions of particulate matter (PM) from the combustion turbine shall not exceed 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume when fired with natural gas, as required by IDAPA 58.01.01.676.

***Operating Requirements***

**3.6 Fuel Restrictions**

The combustion turbine shall be fired exclusively by natural gas. The natural gas burned in the combustion turbine shall not contain sulfur in excess of 0.02 gr/dscf of natural gas.

**3.7 Nitrogen Oxide Emissions Monitoring Equipment Requirements - Installation and Operation**

The permittee shall install, certify, operate, and maintain in accordance with the requirements of 40 CFR 75, a NO<sub>x</sub> continuous emissions monitoring system (CEMS), consisting of a NO<sub>x</sub> pollutant concentration monitor and an oxygen or carbon dioxide diluent gas monitor, with automated data acquisition and handling system for measuring and recording the NO<sub>x</sub> concentration, in parts per million by volume (ppmv), and NO<sub>x</sub> emission rate, in pounds per hour (lb/hr), discharged to the atmosphere from the combustion turbine stack. The permittee shall fully comply with all requirements set forth in 40 CFR 75, Subpart F and 40 CFR 60, Appendices B and F.

**3.8 Carbon Monoxide Emissions Monitoring Equipment Requirements - Installation and Operation**

The permittee shall install, certify, operate, and maintain a CEMS consisting of a CO pollutant concentration monitor and an oxygen diluent gas monitor. The CEMS shall be equipped with an automated data acquisition and handling system for measuring and recording the CO concentration (in ppmv) and CO emissions rate (in lb/hr) discharged to the atmosphere from the combustion turbine stack. The permittee shall fully comply with all requirements set forth in 40 CFR 60, Appendices B and F.

**3.9 Turbine Exhaust Flowrate Quantification Requirement**

The permittee shall use the methodologies prescribed by Method 19 in 40 CFR 60, Appendix A, to quantify the turbine exhaust flowrate.

**3.10 Turbine Startup Restriction**

The permittee shall under no circumstance commence startup of the combustion turbine without prior, written DEQ-approval of the protocol required by Permit Condition 3.16.

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| <b>Location:</b> Mountain Home, Idaho                        |                                  |                                   |

***Monitoring and Recordkeeping Requirements***

**3.11 Fuel Consumption Monitoring Requirement**

The permittee shall monitor and record the amount of natural gas combusted in the turbine on an hourly basis. The amount shall be recorded as cubic feet per hour. All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

**3.12 Nitrogen Oxides Monitoring Requirement**

The permittee shall fully comply with all monitoring requirements established by 40 CFR 72.9(b). The permittee shall fully comply with all monitoring and recordkeeping requirements set forth in 40 CFR 75, Subpart F and 40 CFR 60, Appendix F. All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

**3.13 Carbon Monoxide Relative Accuracy Test Audit Requirement**

Within 60 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after initial start-up of the combustion turbine, the permittee shall perform a relative accuracy test audit (RATA) on the CO CEMS. The initial RATA, and any subsequent RATAs conducted to demonstrate compliance, shall be performed in accordance with 40 CFR 60, Appendix F. All records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

**3.14 Nitrogen Oxides Performance Test Requirements – New Source Performance Standard**

Within 60 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after initial start-up, the permittee shall conduct a performance test to measure NO<sub>x</sub> emissions from the gas turbine emissions stack in accordance with the test methods and procedures in 40 CFR 60.335 and 40 CFR 60.8 to demonstrate compliance with the emissions standard in Permit Condition 3.3. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157 and General Provision 6 of this permit, or in accordance with an EPA-approved alternative. Visible emissions shall be observed and recorded during each performance test run using the methods specified in IDAPA 58.01.01.625. During the performance test, the amount of fuel used by the turbine shall be recorded.

**3.15 Fuel Monitoring – New Source Performance Standard**

The permittee shall comply with the fuel sulfur and nitrogen monitoring provisions of 40 CFR Part 60.334(h) and 40 CFR Part 75, Appendix D. All data shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

- 3.15.1 The permittee may, upon EPA approval and DEQ notification, use a single sampling location to monitor fuel for both the Evander Andrews Power Complex, as well as the Bennett Mountain Power Plant.

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| <b>Location:</b> Mountain Home, Idaho                           |                                  |                                   |

**3.16 Emissions Rate Quantification Protocol Requirement**

Within 60 days of permit issuance, the permittee shall submit a protocol addressing the methodology to be used to quantify NO<sub>x</sub> and CO emissions rates from combustion turbine to DEQ for approval. The protocol shall explicitly describe and discuss the manner by which the facility will utilize the data collected and/or derived in accordance with Permit Conditions 3.7 through 3.9 to quantify emissions rates of NO<sub>x</sub> and CO. The protocol shall, at a minimum, include or identify the source of all data to be used in the emissions rate quantification. The protocol must be sufficiently detailed to allow DEQ to reproduce and/or verify emissions rate estimates for purposes of determining compliance status with respect to Permit Condition 3.4.

**3.17 Nitrogen Oxides and Carbon Monoxide Emissions Rate Requirements**

The permittee shall monitor and record the information listed below for the combustion turbine. The listed information shall be compiled in accordance with a DEQ-approved protocol, required per Permit Condition 3.16. All data shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

- 3.17.1 The total NO<sub>x</sub> emissions rate in tons per each calendar month after turbine startup.
- 3.17.2 The total, cumulative NO<sub>x</sub> emissions rate in tons per each consecutive 12-month period.
- 3.17.3 The total CO emissions rate in tons per each calendar month after turbine startup.
- 3.17.4 The total, cumulative CO emissions rate in tons per each consecutive 12-month period.

**3.18 General Provisions Requirements – New Source Performance Standard**

The permittee shall comply with the applicable NSPS General Provisions specified in 40 CFR Part 60, Subpart A.

**Reporting Requirements**

**3.19 Test Protocols for Continuous Emissions Monitoring System Certification/Recertification Tests**

- 3.19.1 The permittee shall submit a test protocol to DEQ for each certification and recertification of the NO<sub>x</sub> and CO CEMS required by Permit Conditions 3.7 and 3.8 for approval. Each test protocol shall be submitted to DEQ for approval at least 30 days prior to the respective test date.
- 3.19.2 One year after permit issuance, the permittee may waive the reporting requirements of Permit Condition 3.19.1.

**3.20 Continuous Emissions Monitoring System Quality Assurance Procedures Requirement**

All CEMS data submitted to EPA or DEQ shall meet the quality assurance procedures in 40 CFR 60, Appendix F.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050002**

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| <b>Location:</b> Mountain Home, Idaho                           |                                  |                                   |

**3.21 Required Relative Accuracy Test Audit Information**

The results of any RATAs conducted for compliance shall be submitted to DEQ within 60 days of the completion of the test.

**3.22 Nitrogen Oxides Continuous Emissions Monitoring System Information**

The permittee shall fully comply with the reporting requirements set forth in 40 CFR 75, Subpart G. In accordance with 40 CFR 75.60(b)(2), copies of all certification or recertification notifications, certification or recertification applications, and monitoring plans shall be submitted to DEQ. The copies shall be submitted to DEQ no later than the respective date specified in 40 CFR 75, Subpart G, for submission to the EPA Administrator.

In addition, the permittee shall submit a written report (including all raw field data, etc.) to DEQ for each certification or recertification test required in accordance with Permit Condition 3.12. Each report shall be submitted to DEQ within 60 days of the date on which the respective test was completed.

**3.23 Performance Test Protocols**

The permittee shall submit a test protocol, for each performance test required in the monitoring section of this permit, to DEQ for approval at least 30 days prior to the test date.

**3.24 Performance Test Reports**

The permittee shall submit a written report of the performance test results, as required in the monitoring section of this permit, to DEQ within 60 days of performing each respective test.

**3.25 Excess Nitrogen Oxides Emissions – New Source Performance Standard**

For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions of NO<sub>x</sub> that shall be reported are defined as any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the performance test required in 40 CFR 60.8. Each report shall include the average fuel consumption, ambient conditions, gas turbine load, nitrogen content of the fuel during the period of excess emissions, and the graphs or figures developed under 40 CFR 60.335(a).

**3.26 Excess Sulfur Dioxide Emissions – New Source Performance Standard**

The permittee shall submit a report of all excess emissions of SO<sub>2</sub> to DEQ in accordance with 40 CFR 60.7(b) through (d). For this report, excess SO<sub>2</sub> emissions are defined in 40 CFR 60.334(c)(2) as any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight.

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| <b>Location:</b> Mountain Home, Idaho                        |                                  |                                   |

**4. EMISSIONS UNIT NO. 2 – ONE FUEL HEATER**

**4.1 Process Description**

The primary purpose of the fuel heater is to heat natural gas prior to combustion in the turbine.

**4.2 Emissions Control Description**

Emissions from the fuel heater are uncontrolled.

***Emissions Limits***

**4.3 Criteria Pollutant Emissions Limits**

The NO<sub>x</sub> and CO emissions from the fuel heater stack shall not exceed any corresponding emissions rate limits listed in Table 4.1.

**Table 4.1 FUEL HEATER EMISSIONS LIMITS\***

| Source Description | NO <sub>x</sub> | CO   |
|--------------------|-----------------|------|
|                    | T/yr            | T/yr |
| Fuel Heater        | 0.84            | 0.71 |

\*The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

**4.4 Fuel Burning Equipment Emissions Standard**

Emissions of PM from the fuel heater shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when fired with natural gas, as required by IDAPA 58.01.01.676.

***Operating Requirements***

**4.5 Fuel Restriction**

The fuel heater shall be fired exclusively by natural gas. The natural gas burned in the fuel heater shall not contain sulfur in excess of 0.02 gr/dscf of natural gas.

**4.6 Fuel Firing Restriction**

The volume of natural gas combusted in the fuel heater shall not exceed 16,878,613 cubic feet in any consecutive 12-month period.

***Monitoring and Recordkeeping Requirements***

**4.7 Operational Monitoring Requirement**

A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request. The permittee shall monitor and record the following information:

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| <b>Location:</b> Mountain Home, Idaho                           |                                  |                                   |

- The total volume of natural gas combusted in the fuel heater in standard cubic feet per calendar month.
- The total volume of natural gas combusted in the fuel heater in standard cubic feet per any consecutive 12-month period.

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| <b>Location:</b> Mountain Home, Idaho                           |                                  |                                   |

**5. SUMMARY OF EMISSIONS LIMITS**

Table 5.1 provides a summary of all emissions rate limits required by this permit:

**Table 5.1 SUMMARY OF EMISSIONS LIMITS**

| Idaho Power Co., Bennett Mountain<br>Emissions Limits <sup>a</sup> - Hourly (lb/hr) and Annual <sup>b</sup> (T/yr) |                               |      |                 |      |                 |        |       |        |       |      |
|--|-------------------------------|------|-----------------|------|-----------------|--------|-------|--------|-------|------|
| Source<br>Description  | PM <sub>10</sub> <sup>c</sup> |      | SO <sub>2</sub> |      | NO <sub>x</sub> |        | CO    |        | VOC   |      |
|  | lb/hr                         | T/yr | lb/hr           | T/yr | lb/hr           | T/yr   | lb/hr | T/yr   | lb/hr | T/yr |
| Combustion Turbine   |                               |      |                 |      |                 | 248.16 |       | 248.29 |       |      |
| Fuel Heater  |                               |      |                 |      |                 | 0.84   |       | 0.71   |       |      |

<sup>a</sup>As determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

<sup>b</sup>As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates. The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

<sup>c</sup>Includes condensibles.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050002**

|  |                                  |                                   |
|--|----------------------------------|-----------------------------------|
| <b>Permittee:</b> Idaho Power – Bennett Mountain Power Plant | <b>Facility ID No.</b> 039-00025 | <b>Date Issued:</b> June 21, 2005 |
| <b>Location:</b> Mountain Home, Idaho                        |                                  |                                   |

**6. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

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

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050002**

|  |                                  |                                   |
|--|----------------------------------|-----------------------------------|
| <b>Permittee:</b> Idaho Power – Bennett Mountain Power Plant | <b>Facility ID No.</b> 039-00025 | <b>Date Issued:</b> June 21, 2005 |
| <b>Location:</b> Mountain Home, Idaho                        |                                  |                                   |

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