



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

February 6, 2009

Certified Mail No. 7190 0596 0014 0000 5568

Derek Forsberg
Northwest Pipeline GP
295 Chipeta Way
Salt Lake City, UT 84108

RE: Facility ID No. 005-00028, Northwest Pipeline GP - Lava Hot Springs Compressor Station, Topaz; Final Permit Letter

Dear Mr. Forsberg:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0163 to Northwest Pipeline GP for increasing the allowable emissions rates from three existing gas turbines at the Lava Hot Springs Compressor Station located at Topaz, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on October 31, 2008. This permit is effective immediately and replaces PTC No. 005-00028, issued on June 28, 2002, the terms and conditions of which no longer apply. This permit does not release Northwest Pipeline GP from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Pocatello Regional Office, 444 Hospital Way #300, Pocatello, ID 83201 Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rick Elkins, Air Quality Compliance Officer, at (208) 236-5020 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other 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 contact Darrin Pampaian at (208) 373-0502 or darrin.pampaian@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\DRP\hp

Project No. P-2008.0163

Enclosures



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2008.0163
FACILITY ID No.: 005-00028
AQCR: 61 **CLASS:** A **ZONE:** 12
SIC: 4922 **NAICS:** 486210
UTM COORDINATE (km): 410.6, 4720.1

1. PERMITTEE

Northwest Pipeline GP - Lava Hot Springs Compressor Station

2. PROJECT

PTC Modification - Increasing hourly and annual PM₁₀, SO₂, NO_x, and CO emissions and decreasing hourly and annual VOC emissions.

3. MAILING ADDRESS

295 Chipeta Way

CITY

Salt Lake City

STATE

UT

ZIP

84108

4. FACILITY CONTACT

Derek Forsberg

TITLE

Environmental Scientist

TELEPHONE

(801) 584-6748

5. RESPONSIBLE OFFICIAL

Barry Orgill

TITLE

Director of Operations

TELEPHONE

6. EXACT PLANT LOCATION

6680 E. Old Oregon Trail Rd., Topaz, ID

COUNTY

Bannock

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Natural gas transmission compressor station

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, 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 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 in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

DARRIN PAMPAIAN, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

February 6, 2009

DATE ISSUED:

August 16, 1995

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutant
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
ISO	International Organization for Standardization
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PTC	permit to construct
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0163

Permittee: Northwest Pipeline, GP – Lava Hot Springs Compressor Station
Location: Topaz, Idaho

Facility ID No. 005-00028

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permitting action is to allow for hourly and annual increases in PM₁₀, SO₂, NO_x, and CO emissions and hourly and annual decreases in VOC emissions. This permitting action modifies the facility's existing permit, which established enforceable requirements for the facility's operations involving the gas turbines at the facility in accordance with the *Rules for the Control of Air Pollution in Idaho*.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces PTC No. 005-00028, issued on June 28, 2002, the terms and conditions of which shall no longer apply.

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control
2.	<u>GAS TURBINE:</u> T4002 - Solar Centaur model 40-4002 natural gas-fired gas turbine with a maximum rating of 4,107 hp @ ISO conditions installed in 1978	None Exit height: 31.69 ft Exit diameter: 3.51 ft Exit flow rate: 72,880 acfm Exit velocity: 126.2 ft/s Exit temperature: 771.0 °F
	<u>GAS TURBINE:</u> T4700S - Solar Centaur model 40-4700S natural gas-fired gas turbine with a maximum rating of 4,700 hp @ ISO conditions installed in 2003	SoLo NO _x Combustor Exit height: 41.60ft Exit diameter: 3.41 ft Exit flow rate: 83,070 acfm Exit velocity: 152.49 ft/s Exit temperature: 819.0 °F
	<u>GAS TURBINE:</u> T1300 - Solar Saturn model 10-1300 natural gas-fired gas turbine with a maximum rating of 1,300 hp @ ISO conditions installed in 2001 (skid mounted)	None Exit height: 25.98 ft Exit diameter: 2.43 ft Exit flow rate: 29,615 acfm Exit velocity: 107.3 ft/s Exit temperature: 873.0 °F

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Location:	Topaz, Idaho	

2. THREE NATURAL GAS-FIRED TURBINES

2.1 Process Description

The three natural gas-fired turbines are used to power natural gas compressors on a Federal Energy Regulatory Commission (FERC) regulated natural gas pipeline. Two of the gas turbines are stationary and one is skid mounted. The purpose of the portable gas turbine is to deliver additional power at the compressor station in times of high natural gas demand.

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2.2 Emissions Control Description

Table 2.1 THREE NATURAL GAS-FIRED TURBINES DESCRIPTION

Emissions Unit/Process	Emissions Control Device	Emissions Point
Stationary Gas Turbine/T4002	N/A	Exhaust stack T4002
Stationary Gas Turbine/T4700S	SoLo NO _x Combustor	Exhaust stack T4700S
Skid Mounted Gas Turbine/T1300	N/A	Exhaust stack T1300

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Emissions Limits

2.3 Emissions Limits

The NO_x, CO, and VOC emissions from the T4002, T4700S, and T1300 gas turbine stacks shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 THREE NATURAL GAS-FIRED TURBINES EMISSIONS LIMITS¹

Source Description	NO _x		CO		VOC	
	lb/hr	T/yr ²	lb/hr	T/yr ²	lb/hr	T/yr ²
Gas Turbine T4002	21.65	94.85	19.98	87.53	0.46	2.01
Gas Turbine T4700S	3.89	17.02	4.74	20.77	0.27	1.19
Gas Turbine T1300	7.88	34.51	12.80	56.04	0.37	1.61

¹ In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements.

² Tons per consecutive 12-calendar month period.

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2.4 Opacity Limit

Emissions from the three gas turbine stacks, or any other stack, vent, or functionally equivalent opening associated with the three gas turbines, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.5 NSPS NO_x Emissions Limit

In accordance with 40 CFR 60.332(a)(2) NO_x emissions from the T4002 gas turbine shall not exceed 0.0167% by volume at 15% oxygen.

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Location:	Topaz, Idaho	

2.6 NSPS NO_x Emissions Limit

In accordance with 40 CFR 60.332(a)(2), NO_x emissions from the T4700S gas turbine shall not exceed 0.0166% by volume at 15% oxygen.

2.7 NSPS NO_x Emissions Limit

In accordance with 40 CFR 60.332(a)(2), NO_x emissions from the T1300 gas turbine shall not exceed 0.0150% by volume at 15% oxygen.

Operating Requirements

2.8 Allowable Fuel Types

The three gas turbines shall only combust natural gas as fuel.

2.9 Natural Gas Sulfur Content Limit

In accordance with 40 CFR 60.333(b), the sulfur content of the natural gas combusted in the three gas turbines shall not exceed 0.8% by weight.

Monitoring and Recordkeeping Requirements

2.10 Fuel Use Monitoring

The permittee shall monitor and record the fuel usage for the three gas turbines continuously using fuel flow meters that are accurate to within $\pm 5.0\%$. The fuel flow meters shall be calibrated once each year. The date and time of each calibration and any maintenance performed on the fuel meters shall also be recorded. Each calendar month, the permittee shall record total monthly fuel usage and maximum hourly fuel usage for the turbines.

2.11 Emissions Calculations

Each month the permittee shall calculate the maximum hourly emissions and the monthly emissions of NO_x and CO in tons per month for the three gas turbines. The permittee shall use the data from the most recent source test, where available, or the emission factors used in the permit application. Each month the permittee shall calculate the annual emissions for the previous 12-consecutive-month period. Records of these calculations shall be kept for a period of at least two years and shall be made available to Department representatives upon request.

2.12 Fuel Sulfur and Nitrogen Content

As long as the three gas turbines are burning pipeline-quality natural gas, the permittee shall maintain records of the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less.

2.13 Recordkeeping

The permittee shall comply with the recordkeeping requirements of General Provision 7.

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Performance Testing Requirements

2.14 NSPS Performance Test(s)

Within 60 days after achieving the maximum production rate at which the source will operate, but not later than 180 days after initial startup of each new or modified turbine, the permittee shall conduct performance tests to measure NO_x emissions from the gas turbine stack(s). This initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with 40 CFR 60.335 as allowed in IDAPA 58.01.01.157.

Reporting Requirements

2.15 Performance Test Protocol

The permittee shall submit a test protocol to the Department for approval at least 30 days prior to the performance tests required in Permit Condition 2.14.

2.16 Performance Test Report

The permittee shall submit a report of the results of the performance tests required in Permit Condition 2.14, including all required process data, to the Department within 30 days after the date on which the stack sampling is concluded.

2.17 Certification of Documents

In accordance with IDAPA 58.01.01.123, all documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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.

2.18 40 CFR 60, Subpart A – General Provisions

The permittee shall comply with the following applicable requirements of 40 CFR 60, Subpart A – General Provisions.

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Location: Topaz, Idaho

Facility ID No. 005-00028

Table 2.3 SUBPART A – GENERAL PROVISIONS

Section	Section Title	Summary of Section Requirements
60.4	Address	All notifications and reports shall be submitted to: Department of Environmental Quality Pocatello Regional Office 444 Hospital Way #300 Pocatello, ID 83201
60.7(b),(c),(d) and (f)	Notification and Record Keeping	<ul style="list-style-type: none"> • Notification of commencement of construction postmarked no later than 30 days of such date. • Notification of startup postmarked within 15 days of such date. • Notification of physical or operational change that may increase emissions postmarked 60 days before the change is made. • Maintain records of the occurrence and duration of any: startup, shutdown or malfunction of the affected source; malfunction of air pollution control device; and any period when a continuous monitoring system or monitoring device is inoperative. • Maintain in a permanent form records suitable for inspection of all measurements, system testing, performance measurements, calibration checks, and adjustments/maintenance performed. Records shall be maintained for a period of two years from the date the record is required to be generated by the applicable regulation.
60.8	Performance Tests	<ul style="list-style-type: none"> • The owner or operator shall provide notice at least 30 days prior to any performance test to afford an opportunity for an observer to be present during testing. • Within 60 days of achieving maximum production, but not later 180 days after startup the permittee shall conduct performance test(s) and furnish a written report of the results of the test(s).
60.11(a),(b),(c), (d) and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> • Other than opacity standards, where performance tests are required compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • Compliance with NSPS opacity standards shall be determined by Method 9 of Appendix A. The owner or operator may elect to use COM measurements in lieu of Method 9 provided notification is made at least 30 days before the performance test. • At all times, including periods of startup, shutdown, and malfunction to the extent practicable, the operator shall maintain and operate any affected facility and air pollution control equipment consistent with good air pollution control practices. • For the purposes of determining compliance with standards any credible evidence may be used if the appropriate performance or compliance test procedure has been performed.
60.12	Circumvention	No owner or operator shall build, erect, install or use any article or method, including dilution, to conceal an emission which would otherwise constitute a violation.
60.14	Modification	<ul style="list-style-type: none"> • Physical or operational changes to source types that are regulated by a NSPS which result in an increase in hourly emissions to which a standard applies is considered a modification (unless expressly exempted the NSPS). Modified sources become subject to the NSPS standards. • Note that in accordance with IDAPA 58.01.01.201 no owner or operator may commence a modification without first obtaining a permit to construct unless the modification is exempted from the need to obtain a permit in accordance with IDAPA 58.01.01.220-223.

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Location:	Topaz, Idaho	

2.19 Tier I Application Requirement

The permittee shall submit to the Department a complete application for an original Tier I operating permit within 12 months of the date from when this permit is issued in accordance with IDAPA 58.01.01.313.

[February 6, 2009]

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Location:	Topaz, Idaho	

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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.

[Idaho Code §39-101, et seq.]

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.

[IDAPA 58.01.01.211, 5/1/94]

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee’s premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0163

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. 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.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. 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.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]