



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

February 22, 2012

Mr. Matt Armstrong  
Williams Gas Pipeline–West  
P.O. Box 58900  
Salt Lake City, UT 84158-0900

Dear Mr. Armstrong:

**NWP Mt. Vernon Compressor Station PSD-01-09 Amendment 6**

Ecology reviewed the Williams Northwest Pipeline (NWP) letters dated October 18, 2011, and February 7, 2012. These letters request clarification and simplification of NO<sub>x</sub> monitoring conditions in PSD-01-09 Amendment 5 related to the use of portable NO<sub>x</sub> monitors to monitor compliance for the site's two gas turbines, and several other recordkeeping and reporting changes in preparation of renewal of the site's Title V permit.

Ecology agrees that using the portable analyzers to measure NO<sub>x</sub> volume percent in the turbines exhaust gas is an adequate indicator of compliance, and the additional calculation of NO<sub>x</sub> mass flow is not required. Repeated testing has shown that when the volume percent measurement is in compliance, the mass emissions will also calculate to be in compliance. The words "and 5.1.3.1" and "and 5.2.3.1" were removed from several locations in Conditions 5.1 and 5.2 to accomplish this change.

In amendment 5, Conditions 5.1.6.1.3 and 5.2.6.1.3 require that if three consecutive tests for NO<sub>x</sub> volume percent indicate a NO<sub>x</sub> concentration that is out of compliance, further testing for three hours be done (to eliminate the possibility of a false positive test and to indicate compliance status with the NO<sub>x</sub> permit limit's 3-hour averaging time). If an exceedance or high reading persists, the unit should then be shut down as soon as practical and the cause of the problem reading found and repaired. Williams requested that the delay in shutdown requirement be eliminated, and repairs be allowed to begin as soon as a problem is indicated. To facilitate this, Williams suggested reducing the NO<sub>x</sub> permit limits averaging time from three hours to one hour. Since this is more stringent than the existing condition, Ecology and NWCAA agreed. The additional testing requirement is therefore removed from Approval Conditions 5.1.6.1.3 and 5.2.6.1.3, and the averaging time reduced in Conditions 5.1.1 and 5.2.1.

NWP requested that Condition 1.2 be modified to allow reporting of sulfur dioxide (SO<sub>2</sub>) emissions from the sites natural gas turbines be based on the maximum tariff sheet or contract for the gaseous fuel, which is 20.0 grains/100 scf or less. Ecology cannot agree to this for several reasons.

1. This change would need to be modeled as an increase in emissions, and its impacts modeled and analyzed. This would need to be done as a PSD permit modification, not a permit administrative amendment.
2. Many western Washington natural gas users currently report their combustion related sulfur emissions based on the sulfur content analysis supplied by NWP. If this gas analysis information was not available, emissions would need to be calculated and reported using the best information available, which could be the tariff limit. This would most likely increase reported emissions and could raise serious issues with several western Washington sources related to their air emission permit major source applicability, and also SO<sub>2</sub> impacts related to the new 1-hour SO<sub>2</sub> NAAQS.



Mr. Matt Armstrong

Page 2

February 22, 2012

NWP requested that annual compliance testing be allowed to be scheduled earlier than the currently permitted minimum of 10 months after the previous compliance test. Since this is more stringent, and does not change the requirement that tests be a maximum of 13 months apart, Ecology and NWCAA agree this is appropriate, and the minimum interval between tests requirement has been removed from the permit.

NWP requested permission to have the option of keeping long-term (5 years) and other records at corporate locations rather than on-site. Changes were requested to several other small notification and recordkeeping requirements also. These requests and changes are approved by Ecology and NWCAA.

Ecology has determined that Amendment 6 is an administrative PSD amendment. WAC 173-400-750(3)(c) and (d) allow PSD permit revisions to be considered administrative if they "...do not reduce the permittee's or ecology's ability to determine compliance with the emission limitations," and "...do not reduce the stringency of the emission limitations in the PSD permit or the ability of ecology, the permitting authority, EPA, or the public to determine compliance with the approval conditions in the PSD permit." EPA's guidance document permmod.pdf says that a permit change is administrative if it "...involves no increase in either emissions or impacts and no fundamental change in either the source or one of the emission units at that source. Application or permit revisions may be necessary, but additional review or analysis would not normally be required...." Amendment 6 does not change the frequency of testing required, change the test methods used, or allow any change that would require additional review or analysis. It is more stringent because it shortened the NO<sub>x</sub> permit limit's averaging time from three hours to one hour. Ecology has determined that Amendment 6 fits both the state and federal guidance defining an administrative amendment.

Administrative amendments do not require public notice, so there will be no public notice period for this amendment.

If you have any questions, please contact me at (360) 407-6812 or robert.burmark@ecy.wa.gov.

Sincerely,



Robert C. Burmark, P.E.  
Environmental Engineer

rcb/te

Enclosure

cc: Christos Christoforou, NWCAA  
Marc Crooks, Ecology  
Tonnie Cummings, NPS  
Rick Graw, USFS  
Pat Nair, EPA R10