

Addendum No. 2
Minor Permit Modification

Oregon Title V Operating Permit 25-0031-TV-01 is revised in accordance with OAR 340-218-0170 (minor permit modification) to modify Conditions 38 and 52.b as follows:

38. Fuel gas monitoring must be conducted as follows: [40 CFR 4365(a)]
- 38.a. Nitrogen monitoring is waived for pipeline quality natural gas, as there is no fuel-bound nitrogen and the free nitrogen does not contribute appreciably to NO_x emissions.
 - 38.b. The permittee must demonstrate compliance with Condition 14.d. by maintaining a natural gas tariff sheet that verifies the natural gas burned in the combustion turbines (CT1.EU and CT2.EU) contains a total sulfur content of 20 grains per 100 standard cubic feet, or less, in accordance with 40CFR 60.4365(a). A copy of the tariff sheet must be maintained on site and be available for Department review upon request.
- 52.b. The permittee must submit two copies of semi-annual NSPS excess emissions reports to the Eastern Region of the Department and one copy submitted to the EPA. Reports must be prepared and submitted in accordance with 40 CFR 60.7(c) except that, consistent with 40 CFR 60.19(d), the submittal date for these reports has been changed so that they are due at the same time as the semi-annual compliance certification required by Condition 50. The report must include a log of all planned and unplanned excess emissions and a monitoring system performance report in accordance with 40 CFR 60.7(c), 60.49b(i), and 60.4374(b).



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
OREGON TITLE V OPERATING PERMIT
ADDENDUM NO. 2
MINOR PERMIT MODIFICATION**

REVIEW REPORT

Oregon Title V Operating Permit No. 25-0031-TV-01 issued to Portland General Electric Company's Coyote Springs facility in Boardman, Oregon was renewed on May 31, 2013. Addendum No. 1 was issued on March 28, 2014 incorporating conditions from a Standard ACDP (25-0031-ST-01) into the Title V Permit. The ACDP allowed installation of a cooling optimization package and cold day optimization software on combustion turbine 2 (emission unit CT2). This addendum is a minor permit modification to change two permit conditions as allowed by current regulations.

When the permit was initially issued the requirements of 40 CFR 60, Subpart GG (New Source Performance Standards for Stationary Gas Turbines) were included in the permit. This included a condition to monitor the sulfur content of the fuel gas semi-annually in accordance with a customized fuel gas monitoring schedule for sulfur, as hydrogen sulfide, as approved by EPA on December 8, 1993. This condition is included in the current Title V permit.

A significant permit modification was issued on May 13, 2010 which allowed modifications to the duct burners of combustion turbine 2 (CT2). A subsequent significant permit modification was issued on April 1, 2011 which allowed modifications to combustion turbine 1 (CT1). These modifications made the facility subject to the requirements of 40 CFR 60, Subpart KKKK (New Source Performance Standards for Stationary Combustion Turbines). According to 40 CFR 60.4305(b) stationary combustion turbines subject to Subpart KKKK are exempt from the requirements of Subpart GG. Most of the conditions related to Subpart GG were replaced by conditions related to Subpart KKKK. However, the monitoring of the sulfur content was not replaced. Subpart KKKK allows the fuel quality characteristics in a current, valid tariff sheet to be used to meet the fuel gas sulfur monitoring requirements. The permit will be modified to remove the monitoring requirements of Subpart GG and add the monitoring allowed by Subpart KKKK.

The permittee also requested to modify the due date for submission of the semiannual NSPS excess emission reports. Currently, the reports are required to be submitted by the 30th day following the end of each semiannual calendar period in accordance with 40 CFR 60.7(c). However, 40 CFR 60.19(d) allows the report to be submitted by a date consistent with a schedule established by DEQ. The permittee has requested to submit this report when the semiannual compliance certifications are submitted (July 30 and March 1 of each year). DEQ approves this request.

PUBLIC NOTICE

The proposed permit revision will be sent to EPA for a 45 day review period. DEQ may request and EPA may agree to an expedited review of 5 days. If EPA does not object in writing, the permit revision will be issued as proposed.