ADEQ
OPERATING
AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation 26:

Permit No. : 1842-AOP-R3
Renewal #1
IS ISSUED TO:
Wrightsville Power Facility, LLC
17400 Highway 365 South
Wrightsville, AR 72183
Pulaski County
AFIN: 60-01380

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

AND

THE PERMITTEE IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Michael Bonds
Chief, Air Division

Date

Table of Contents

List of Acronyms and Abbreviations

A.C.A.	Arkansas Code Annotated
AFIN	ADEQ Facility Identification Number
CFR	Code of Federal Regulations
CO	Carbon Monoxide
HAP	Hazardous Air Pollutant
lb/hr	Pound Per Hour
MVAC	Motor Vehicle Air Conditioner
No.	Number
NO_x	Nitrogen Oxide
PM	Particulate Matter
PM10	Particulate Matter Smaller Than Ten Microns
SNAP	Significant New Alternatives Program (SNAP)
SO_2	Sulfur Dioxide
SSM	Startup, Shutdown, and Malfunction Plan
Tpy	Tons Per Year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

SECTION I: FACILITY INFORMATION

PERMITTEE:	Wrightsville Power Facility, LLC
AFIN:	60-01380
PERMIT NUMBER:	1842-AOP-R3
FACILITY ADDRESS:	17400 Highway 365 South Wrightsville, AR 72183
MAILING ADDRESS:	4200 South Hulen, Suite 527 Fort Worth, TX 76109
COUNTY:	Pulaski
CONTACT POSITION:	Rick Waggoner
TELEPHONE NUMBER:	817-732-6900
REVIEWING ENGINEER:	Bryan Leamons
UTM North South (Y):	3827.8
UTM East West (X):	571.8
Zone:	15

SECTION II: INTRODUCTION

Summary of Permit Activity

Issuance of this permit completes Title V renewal requirements. This is the first renewal to the permit. No modifications are taking place.

The first renewal permits typically involve the inclusion of applicable requirements of 40 CFR, Part 64, *Compliance Assurance Monitoring* (CAM) to affected units. This facility has no CAM affected units; there is no control equipment with pre-control emissions greater than 100 tons per year.

Process Description

The Wrightsville Power Facility, LLC operates a 510 megawatt (MW) combined-cycle natural gas combustion turbine plant located in Pulaski County, 0.5 miles south of Wrightsville, Arkansas. The plant consists of six (6) General Electric LM6000 aeroderivative turbines, one (1) General Electric Frame 7EA turbine, seven duct burners, steam turbines, an emergency diesel generator, and a cooling tower.

The plant is designed to supply approximately 450 to 510 MW of power during high electrical demand hours of each day (usually between the hours of 7:00 a.m. and 11:00 p.m.) and ramp down to approximately 75 MW during off-peak hours. This daily load cycling results in reduced power production each day during hours when there is no demand for the power.

Regulations

The following table contains the regulations applicable to this permit.

Regulations
Arkansas Air Pollution Control Code, Regulation 18, effective February 15, 1999
Regulations of the Arkansas Plan of Implementation for Air Pollution Control, Regulation 19, effective December 19, 2004
Regulations of the Arkansas Operating Air Permit Program, Regulation 26, effective September 26, 2002
40 CFR 52.21, Prevention of Significant Deterioration (PSD)
NSPS Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
NSPS Subpart GG - Standards of Performance for Stationary Combustion Turbines;
40 CFR Part 75 - Continuous Emission Monitoring

The following table is a summary of emissions from the facility. This table, in itself, is not an enforceable condition of the permit.

Emission Summary

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy**
Total Allowable Emissions		PM	43.2	185.3
		PM_{10}	42.0	180.2
		SO_2	3.8	13.2
		VOC	17.6	74.0
		CO	612.9	818.6
		NO_X	418.1	619.0
HAPs		acrolein* formaldehyde* PAH*	0.04 2.24 0.01	0.14 9.79 0.05
01	LM6000 Combustion Turbine with Duct Burner	PM PM_{10} SO_2 VOC CO NO_x acrolein formaldehyde PAH	5.2 5.2 0.4 2.1 79.0 56.0 0.01 0.28 0.01	177.0 177.0 13.0 73.6 815.8 607.0 0.14 9.79 0.05
02	LM6000 Combustion Turbine with Duct Burner	PM PM_{10} SO_2 VOC CO NO_x acrolein formaldehyde PAH	5.2 5.2 0.4 2.1 79.0 56.0 0.01 0.28 0.01	

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy**
03	LM6000 Combustion Turbine with Duct Burner	PM PM_{10} SO_2 VOC CO NO_x acrolein formaldehyde PAH	5.2 5.2 0.4 2.1 79.0 56.0 0.01 0.28 0.01	
04	LM6000 Combustion Turbine with Duct Burner	PM PM_{10} SO_2 VOC CO NO_x acrolein formaldehyde PAH	5.2 5.2 0.4 2.1 79.0 56.0 0.01 0.28 0.01	
05	LM6000 Combustion Turbine with Duct Burner	PM PM_{10} SO_2 VOC CO NO_x acrolein formaldehyde PAH	5.2 5.2 0.4 2.1 79.0 56.0 0.01 0.28 0.01	
06	LM6000 Combustion Turbine with Duct Burner	PM PM_{10} SO_2 VOC CO NO_x acrolein formaldehyde PAH	5.2 5.2 0.4 2.1 79.0 56.0 0.01 0.28 0.01	

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy**
07	7EA Frame Combustion Turbine with Duct Burner	PM PM_{10} SO_2 VOC CO NO_x acrolein formaldehyde PAH	9.2 9.2 0.8 4.2 132.0 52.0 0.01 0.56 0.01	
08	Emergency Diesel Generator	PM PM_{10} SO_2 VOC CO NO_x	0.9 0.9 0.6 0.8 6.9 30.1	0.4 0.4 0.2 0.4 2.8 12.0
09	Cooling Towers	PM PM_{10}	1.9 0.7	7.9 2.8

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.
** Tpy emissions for SN-01 thru SN-07 are bubbled on a worst case scenario so that the facility may operate any combination of turbines at any time within the tpy restriction.

SECTION III: PERMIT HISTORY

1842-AOP-R0, issued February 28, 2000, was the initial operating permit for this facility. This permit went through PSD review including BACT analysis and ambient air impact analysis. A summary of the BACT determinations is located in Section IV of this permit.

1842-AOP-R1, issued March 28, 2002, included provisions for the emission of Hazardous Air Pollutants (HAPs), which were inadvertently left out of the original permit. Each HAP is a subset of the VOC emissions; therefore, the emission change was zero. Emissions were quantified and evaluated according to Department's *Non-Criteria Pollutant Control Strategy*. This modification also included slight changes in impact modeling results due to altered plant layout at the facility. The changes did not trigger any modeling significance levels.

1842-AOP-R2, issued April 7, 2004, included additional permit language to clearly define startup and shutdown periods at the facility. Excess emission reports are not required during these periods. Other required reporting was unchanged, including reporting deviations as required in semi-annual reports. Also included in this permit are references to and requirements of ADEQ's *Continuous Emissions Monitoring Conditions* (CEMS Conditions).

SECTION IV: SPECIFIC CONDITIONS

SN-01 through SN-07
Combustion Turbines with Duct Burners

Source Description

Each of SN-01 through SN-07 represents a combined cycle combustion turbine with a duct burner.

Combustion Turbines: Six of the seven combustion turbines (SN-01 through SN-06) are General Electric LM6000's and are fired solely on pipeline natural gas. Each LM6000 combustion turbine has a nominal electric production rating of 46 MW. One of the seven combustion turbines (SN-07) is a General Electric Frame 7EA. All turbines are fired solely on pipeline natural gas. The 7EA has a nominal electric production rating of 80 MW.

Combustion Turbine Operating Scenarios: The typical operating scenario for each LM 6000 combustion turbine system is for the combustion turbine to operate near or at 100% of the design capacity. The typical operating scenario for the 7EA combustion turbine system is for the combustion turbine to operate between 60% and 100% of the design capacity.

Comparison of BACT and NSPS Subpart GG Limits for the Combustion Turbines:

The combustion turbines are subject to NSPS Subpart GG. Control technologies in the BACT analysis must meet applicable NSPS requirements to be considered viable. The BACT emission limits for each combustion turbine are more stringent than or equal to applicable NSPS requirements.

Emissions Unit	Pollutant	BACT*	NSPS
Each LM6000 (SN-01 - SN-06)	SO_2	N/A	0.8% sulfur by weight
Frame 7EA (SN-07)			
Each LM6000 (SN-01 - SN-06)	NO_x	22 ppmvd @ 15% O_2	113.8 ppmvd @15% O_2
Frame 7EA (SN-07)		9 ppmvd @ 15% O_2	96.6 ppmvd @15% O_2

*the BACT emission factors include emissions from the combustion turbine only.
N/A - SO_2 did not go through BACT review and therefore is not subject to BACT limits.

Duct Burners: Each duct burner is fired solely on pipeline natural gas and adds supplemental heat to the heat recovery steam generator.

Duct Burner Operating Scenario: The duct burner uses combustion turbine exhaust as the combustion air supply. Consequently, the duct burner cannot operate if the combustion turbine is not operating.

Comparison of BACT and NSPS Subpart Db limits for the Duct Burner: The duct burner will be subject to NSPS Subpart Db. Control technologies in the BACT analysis must meet applicable NSPS requirements to be considered viable. The BACT emission limits for each duct burner are more stringent than or equal to applicable NSPS requirements.

Pollutant	BACT-(Duct Burner Only)	NSPS - (Duct Burner only)
NO_x	0.09lb/MMBtu	0.20 lb/MMBtu

Emission Limits: Each combustion turbine/duct burner set exhausts through a single stack, for a total of seven stacks.

BACT Summary for the Combustion Turbine with Duct Burner

Emission Unit	Pollutant	BACT Determination	
Each LM6000 Combustion Turbine with Duct Burner (SN-01 - SN-06)	PM_{10}	combustion of pipeline natural gas	0.011 lb/MMBtu
	VOC	good combustion practices	0.005 lb/MMBtu
	CO	good combustion practices	66 ppmvd @ 15% O_2
	NO_x	steam injection into the turbine combustion process	22 ppmvd @ 15% O_2* 0.09 lb/MMBtu**
7EA Combustion Turbine with Duct Burner (SN-07)	PM_{10}	combustion of pipeline natural gas	0.010 lb/MMBtu
	VOC	good combustion practices	0.005 lb/MMBtu
	CO	good combustion practices	50 ppmvd @ 15% O_2
	NO_x	dry-low NO_x turbine combustor	9 ppmvd @ 15% O_2* 0.09 lb/MMBtu**
All Seven Combustion Turbines with Duct Burners (SN-01 - SN-07)	CO	good combustion	815.8 tpy
	NO_x	low NO_x	607.0 tpy

*the BACT emission factor includes emissions from the combustion turbine only.
** the BACT emission factor includes emissions from the duct burner only.

Specific Conditions

Particulate Matter and Opacity

1. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the hourly emission rates set forth in the following table shall be demonstrated by performance testing of the Combustion Turbine/ Duct Burner stack for PM/PM_{10}. The hourly emission rates set forth in the following table are based on a worst-case scenario. [Regulation 19, §19.501 et seq. and §19.901 et seq., effective December 19, 2004, and 40 CFR Part 52, Subpart E]

Sources	Pollutant	lb/hr
Each LM6000 Combustion Turbine with Duct Burner (SN-01 through SN-06)	PM_{10}	5.2
7EA Combustion Turbine with Duct Burner (SN-07)	PM_{10}	9.2

2. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the hourly emission rates set forth in the following table shall be demonstrated by performance testing of the Combustion Turbine/ Duct Burner stack for PM/PM_{10}. The hourly emission rates set forth in the following table are based on a worst-case scenario. [Regulation 18, §18.801, effective February 15, 1999, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Sources	Pollutant	lb/hr
Each LM6000 Combustion Turbine with Duct Burner (SN-01 through SN-06)	PM	5.2
7EA Combustion Turbine with Duct Burner (SN-07)	PM	9.2

3. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the annual emission rates set forth in the following table shall be demonstrated by performance testing of the Combustion Turbine/ Duct Burner stack for PM/PM_{10}. The annual emission rates set forth in the following table are based on a maximum lb/hr times 8760 hr/yr. [§19.501, §19.901, and 40 CFR Part 52, Subpart E]

Sources	Pollutant	Tons per twelve consecutive months
Combustion Turbines with Duct Burners (SN-01 thru SN-07)	PM_{10}	177.0

4. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the annual emission rates set forth in the following table shall be demonstrated by performance testing of the Combustion Turbine/ Duct Burner stack for PM/PM_{10}. The annual emission rates set forth in the following table are based on a maximum lb/hr times 8760 hr/yr. [§18.801 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Sources	Pollutant	Tons per twelve consecutive months
Combustion Turbines with Duct Burners (SN-01 thru SN-07)	PM	177.0

5. The permittee shall comply with the following BACT determinations for the Combustion Turbine and Duct Burner. Compliance with the emission factors set forth in the following table shall be demonstrated by performance testing of the Combustion Turbine/ Duct Burner stack for PM_{10}. [§19.901and 40 CFR Part 52 Subpart E]

Sources	Pollutant	BACT Determination	
Each LM6000 Combustion Turbine with Duct Burner (SN-01 thru SN-06)	PM_{10}	combustion of clean fuels	0.011 lb/MMBtu
7EA Combustion Turbine with Duct Burner (SN-07)	PM_{10}	combustion of clean fuels	0.010 lb/MMBtu

6. The permittee shall not cause to be discharged to the atmosphere from the Combustion Turbine / Duct Burner stack gases which exhibit an opacity greater than 5%. Compliance with this opacity limit shall be demonstrated by the use of natural gas. [§18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

7. The permittee shall perform stack testing on one-half of each type of Combustion Turbine / Duct Burner stack (SN-01 thru SN-07) for PM/PM_{10} to demonstrate compliance with the limits specified in Specific Conditions 1 through 5. Testing shall be performed every five years in accordance with Plantwide Condition 3. PM testing shall be conducted using EPA Reference Method 5 and 202. The permittee may report all emissions measured using EPA Reference Method 5 and 202 as PM_{10} or the permittee may conduct separate PM_{10} testing using EPA Reference Method 201A and 202. Testing shall be performed at or near the maximum operating load. The Department reserves the right to select the turbine/duct burner to be tested. The specific stacks tested shall be rotated every five years. [§19.702, §19.901, and 40 CFR Part 52 Subpart E]

Sulfur Dioxide

8. The permittee shall not exceed the emission rates set forth in the following table. Compliance with this condition shall be demonstrated by the use of natural gas and Specific Condition 9. [§19.501 and 40 CFR Part 52 Subpart E]

Sources	Pollutant	lb/hr	tpy
Each LM6000 Combustion Turbine with Duct Burner (SN-01 thru SN-06)	SO_2	0.4*	13.0
7EA Combustion Turbine with Duct Burner (SN-07)		0.8*	

*This mass emissions rate is derived from the emission factor provided in 40 CFR Part 75, Appendix D (i.e., 0.0006 lb SO_2/MMBtu).

9. Monitoring requirements relative to SO_2 emissions from the Combustion Turbine and Duct Burner shall be as follows:

   a. The permittee shall conduct SO_2 emissions monitoring procedures in accordance with Specific Condition 28.b.
   b. The permittee shall maintain records which demonstrate compliance with the above condition.

   [§19.703, 40 CFR Part 52 Subpart E, NSPS Subpart GG, 40 CFR Part 75 Subpart B, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Volatile Organic Compounds

10. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the hourly emission rates set forth in the following table shall be demonstrated by performance testing of the Combustion Turbine / Duct Burner stack for

VOC. The hourly emission rates set forth in the following table are based on a worst-case scenario. [§19.501, §19.901, and 40 CFR Part 52 Subpart E]

Sources	Pollutant	lb/hr
Each LM6000 Combustion Turbine with Duct Burner (SN-01 thru SN-06)	VOC (as C3)	2.1
7EA Combustion Turbine with Duct Burner (SN-07)	VOC (as C3)	4.2

11. The permittee shall not exceed the emission rates set forth in the following table. Compliance with the annual emission rates set forth in the following table shall be demonstrated by performance testing of the Combustion Turbine / Duct Burner stack for VOC. The annual emission rates set forth in the following table are based on a maximum lb/hr times 8760 hr/yr. [§19.501, §19.901, and 40 CFR Part 52 Subpart E]

Sources	Pollutant	tons per twelve consecutive months
Combustion Turbines with Duct Burners (SN-01 thru SN-07)	VOC (as C3)	73.6

12. The permittee shall comply with the following BACT determinations for the Combustion Turbine and Duct Burner. Compliance with the emission factors set forth in the following table shall be demonstrated by performance testing of the Combustion Turbine/ Duct Burner stack for VOC. [§19.901 and 40 CFR Part 52 Subpart E]

Sources	Pollutant	BACT Determination	
Each LM6000 Combustion Turbine with Duct Burner (SN-01 thru SN-06)	VOC (as C3)	Good combustion practices	0.005 lb/MMBtu
7EA Combustion Turbine with Duct Burner (SN-07)	VOC (as C3)	Good combustion practices	0.005 lb/MMBtu

13. The permittee shall perform stack testing on one-half of each type of Combustion Turbine/ Duct Burner stack (SN-01 thru SN-07) for VOC to demonstrate compliance with the limits specified in Specific Conditions 10, 11, and 12. Testing shall be

performed every five years in accordance with Plantwide Condition 3 and EPA Reference Method 25A. Testing shall be performed at or near the maximum operating load. The Department reserves the right to select the turbine/duct burner to be tested. The specific stacks tested shall be rotated every five years. [§19.702, §19.901, and 40 CFR Part 52 Subpart E]

Carbon Monoxide

14. The permittee shall not exceed the emission rates set forth in the following table. Each Combustion Turbine/Duct Burner stack (SN-01 thru SN-07) will be monitored by CO CEMS. The CEMS data shall be used to demonstrate compliance with the hourly emission rates set forth in the following table. [§19.501, §19.901, and 40 CFR Part 52 Subpart E]

Sources	Pollutant	lb/hr, using a 3-hr average
Each LM6000 Combustion Turbine with Duct Burner (SN-01 thru SN-06)	CO	79.0
7EA Combustion Turbine with Duct Burner (SN-07)	CO	132.0

15. The permittee shall not exceed the emission rates set forth in the following table. Each Combustion Turbine/Duct Burner stack will be monitored by CO CEMS. The CEMS data shall be used to demonstrate compliance with the annual emission rate set forth in the following table. [§19.501, §19.901, and 40 CFR Part 52 Subpart E]

Source	Pollutant	tons per twelve consecutive months
Combustion Turbines with Duct Burners (SN-01 thru SN-07)	CO	815.8

16. The permittee shall comply with the following BACT determinations for the Combustion Turbine and Duct Burner. Compliance with the emission factors set forth in the following table shall be demonstrated by the initial performance test of the Combustion Turbine and Duct Burner for CO and CEMS requirements. [§19.901 and 40 CFR Part 52 Subpart E]

Sources	Pollutant	BACT Determination
Each LM6000 Combustion Turbine with Duct Burner (SN-01 thru SN-06)	CO	66 ppmvd @ 15% O_2, 3-hr average
7EA Combustion Turbine with Duct Burner		50 ppmvd @ 15% O_2, 3-hr average

17. The permittee shall install, calibrate, maintain, and operate CO CEMS to monitor emissions from each Combustion Turbine/ Duct Burner stack. The CEMS shall comply with the Air Divisions *Continuous Emissions Monitoring Systems Conditions*. A copy is provided in Appendix D. The measured concentrations of CO and O_2 in the flue gas along with the measured fuel flow shall be used to calculate CO mass emissions. The CEMS data may be used by the Department for enforcement purposes. The CEMS shall be used to demonstrate compliance with the CO mass emission limits and emission factors specified in Specific Conditions 14, 15, and 16. [§19.703, §19.901, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Nitrogen Oxides

18. The permittee shall not exceed the emission rates set forth in the following table. Each Combustion Turbine/Duct Burner stack (SN-01 thru SN-07) will be monitored by NO_x CEMS. The CEMS data shall be used to demonstrate compliance with the hourly emission rates set forth in the following table. [§19.501, §19.901, and 40 CFR Part 52 Subpart E]

Sources	Pollutant	lb/hr, using a 24-hr average
Each LM6000 Combustion Turbine with Duct Burner (SN-01 thru SN-06)	NO_x	56.0
7EA Combustion Turbine with Duct Burner (SN-07)	NO_x	52.0

19. The permittee shall not exceed the emission rates set forth in the following table. Each Combustion Turbine/Duct Burner stack will be monitored by NO_x CEMS. The CEMS data shall be used to demonstrate compliance with the annual emission rate set forth in the following table. [§19.501, §19.901, and 40 CFR Part 52 Subpart E]

Sources	Pollutant	tons per twelve consecutive months
Combustion Turbines with Duct Burners (SN-01 thru SN-07)	NO_x	607.0

20. The permittee shall comply with the following BACT determinations for the Combustion Turbine and Duct Burner. Compliance with the 3-hr average emission factors set forth in the following table shall be demonstrated by the initial performance testing of the Combustion Turbine and Duct Burner for NO_x and CEMS requirements. [§19.901 and 40 CFR Part 52 Subpart E]

Sources	Pollutant	BACT Determination
Each LM6000 Combustion Turbine* (SN-01 thru SN-06)	NO_x	22 ppmvd @ 15% O_2 using a rolling 12 month avg. 25 ppmvd @ 15% O_2 using a 3 hr avg.
7EA Combustion Turbine (SN-07)*		9 ppmvd @ 15% O_2 using a 3 hr average
Each Duct Burner (SN-01 thru SN-07)	NO_x	0.09 lb/MMBtu using a 3 hr average**

* the BACT emission factors include emissions from the combustion turbine only.
** the BACT emission factors include emissions from the duct burner only.

21. Monitoring requirements relative to NO_x emissions from the Combustion Turbine and Duct Burner shall be as follows:

    a. The permittee shall install, calibrate, maintain, and operate NO_x CEMS to monitor emissions from each Combustion Turbine/Duct Burner stack in accordance with Specific Condition 28.c.iii. The CEMS shall comply with the Air Divisions *Continuous Emissions Monitoring Systems Conditions*. The CEMS data may be used by the Department for enforcement purposes. The CEMS shall be used to demonstrate compliance with the NO_x mass emission limits specified in Specific Conditions 18 and 19.

b. The permittee shall maintain records which demonstrate compliance with the above condition.

[§19.703, §19.901, 40 CFR Part 52 Subpart E, NSPS Subpart GG, 40 CFR Part 75 Subpart B, and A.C.A. §8-4-203 as referenced by §8-3-304 and §8-4-311]

22. CEMS shall be used to demonstrate compliance with the ppm limits/ emission limits listed in Specific Conditions 18, 19, and 20, except during periods of duct firing. The CEMS shall comply with the Air Divisions *Continuous Emissions Monitoring Systems Conditions*. During those periods of turbine/duct firing, compliance with emission factors set forth in Specific Condition 20 shall be demonstrated by complying with the CEMS verification of Specific Condition 18 only. [§19.901 and 40 CFR Part 52, Subpart E]

HAPs

23. The permittee shall not exceed lb/hr emission rates listed in the following table at SN-01 through SN-07. Initial compliance was determined by successful initial testing completed in July 2002. Ongoing compliance with emission rates shall be demonstrated by the exclusive use of pipeline quality natural gas. [§18.801 and A.C.A. §8-4-203 as referenced by §8-3-304 and §8-4-311]

Source Number	Pollutant	pound per hour	averaging period
01 through 06 (separately)	formaldehyde acrolein PAH	0.28 0.01 0.01	per method 18
07	formaldehyde acrolein PAH	0.56 0.01 0.01	per method 18

24. The permittee shall not exceed ton per year emission rates listed in the following table SN-01 through SN-07 combined. Initial compliance was determined by successful initial testing completed in July 2002. Ongoing compliance shall be determined by compliance with and the exclusive use of pipeline quality natural gas. [§18.801 and A.C.A. §8-4-203 as referenced by §8-3-304 and §8-4-311]

Pollutant	ton per 12 consecutive months
formaldehyde acrolein PAH	9.79 0.14 0.05

Throughput Limitations

25. Each combustion turbine and each duct burner may only fire pipeline natural gas. [§18.1004, §19.705, §19.901, 40 CFR Part 52 Subpart E, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, 40 CFR §70.6, and 40 CFR Part 75]

26. The permittee shall maintain records to demonstrate compliance with Specific Condition 25. These records shall be a copy of the page or pages that contain the gas quality characteristics specified in either a purchase contract or pipeline transportation contract. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes. [§18.1004, §19.705, 40 CFR Part 52 Subpart E, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 75]

Hourly Emissions

27. For the purposes of this permit, “upset condition” reports as required by §19.601 of Regulation 19 shall not be required for periods of startup or shutdown of SN-01 through SN-07. This shall only apply for emissions which directly result from the start-up and/or shutdown of one or more of the combustion turbine units (SN-01 through SN-07). All other "upset conditions" must be reported as required by Regulation 19. The following conditions must be met during startup and shutdown periods.

    a. All CEM systems required for SN-01 through SN-07 must be operating during start up and shutdown. The emissions recorded during these periods shall count toward the annual ton per year emission limits.
    b. The permittee shall maintain a log or equivalent electronic data storage which shall indicate the date, start time, and duration of each start up and shut down procedure. "Startup" shall be defined as the period of time beginning with the first fire within the combustion turbine firing chamber until the unit(s) initially reach 29.9 MW for the LM6000's and 52 MW for the 7EA or a maximum of three hours (whichever comes first). "Shutdown" shall be defined as the period of time up to one hour beginning with the initiation of the shut down procedure and ending when emissions are no longer detected from the source. This log or equivalent electronic data storage shall be made available to Department personnel upon request.
    c. Opacity is not included. If any occurrences should ever occur, “upset condition” reporting is required.
    d. Operating mode, specifically, the current load in megawatts, shall be able to be identified at any time from the control area for that unit and shall be available for inspection by ADEQ representatives at any time.

e. The facility shall comply with 40 CFR 60.7 reporting and recordkeeping requirements as applicable to NSPS limits and applicable parts of the ADEQ CEMS Conditions. CEMS Condition II(F) is not applicable to SN-01 through SN-07.

[§19.601 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

New Source Performance Standards (NSPS)

28. Each combustion turbine is subject to and shall comply with applicable provisions of 40 CFR Part 60 Subpart A – General Provisions and 40 CFR Part 60 Subpart GG – Standards of Performance for Stationary Gas Turbines. Applicable provisions of Subpart GG include, but are not limited to, the following:
    a. NO_x emissions from each LM6000 shall not exceed 113.8 ppmvd at 15% O_2. Pursuant to 40 CFR §60.332(a)(1), NO_x emissions from the 7EA shall not exceed 96.6 ppmvd at 15% O_2. Initial compliance with this condition shall be demonstrated by complying with Specific Condition 20. [40 CFR §60.332(a)(1)]
    b. The permittee shall not burn any fuel which contains sulfur in excess of 0.8 percent by weight. Compliance with this condition shall be demonstrated by Specific Condition 28.c. [40 CFR §60.333(b)]
    c. The permittee shall conduct the following fuel monitoring as an alternative to 40 CFR 60.334(b) and 40 CFR 60.335(a) and (d);
        i. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
        ii. The documentation requirements for natural gas in §2.3.1.4 and the procedures for sulfur content determination in §2.3.3.1 of Appendix D to 40 CFR Part 75 shall be used to monitor the fuel sulfur content. The documentation requirements include the records described in Specific Condition 26. The procedures for sulfur content determination include, measuring pipeline natural gas fuel flow rate using an in-line fuel flow meter, determining the gross calorific value of the pipeline natural gas at least once per month, and using the default emission rate of 0.0006 pounds of SO_2 per million Btu of heat input.
        iii. The permittee shall notify the Department if the sulfur fuel monitoring conducted per Specific Condition 28.c.ii, indicates noncompliance with Specific Condition 28.b.
    d. The permittee shall conduct the following NO_x monitoring and testing as an alternative to 40 CFR 60.334(a) and 40 CFR 60.335(c)(2) and (c)(3):
        i. The permittee shall install, calibrate, maintain, and operate NO_x CEMS to monitor emissions from each Combustion Turbine/Duct Burner stack. The CEMS shall comply with 40 CFR Part 75. The permittee shall use the measured concentrations of NO_x and O_2 in the flue gas along with the measured fuel flow (or another 40 CFR Part 75 procedure) to calculate NO_x mass emissions.

ii. The NO_x CEMS must be capable of calculating 1-hour and 3-hour average NO_x emissions concentrations corrected to 15% O_2.

iii. The permittee shall submit reports of excess emissions as required in 40 CFR 60.7(c) and summary reports as required in 40 CFR 60.7(d). Excess emissions are defined as all periods when the consecutive 3-hour average concentration is greater than the limit in Specific Condition 28.a. Each report shall be submitted on ADEQ Quarterly Excess Emission Report Forms which may be obtained from the Air Division of the Little Rock Office of ADEQ. Alternate forms may be used with prior written approval from the Department.

[§19.304 and 40 CFR Part 60, Subpart GG]

29. The duct burners are subject to and shall comply with applicable provisions of 40 CFR Part 60 Subpart A – General Provisions and 40 CFR Part 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. A copy of Subpart Db is provided in Appendix C. Applicable provisions of Subpart Db include, but are not limited to, the following:

a. NO_x emissions shall not exceed 0.2 lb/MMBtu heat input. Initial compliance with this condition shall be demonstrated by complying with Specific Condition 20. [40 CFR §60.44b(a)(4)(i)]

b. The nitrogen oxides emission standards under §60.44b apply at all times, this includes periods of startup, shutdown, and malfunction. [40 CFR §60.46b(a)]

c. To determine compliance with the emission limit for nitrogen oxides required by 40 CFR §60.44b(a)(4) for duct burners, the owner or operator of the facility shall conduct a performance test required under 40 CFR §60.8 using the nitrogen oxides and oxygen measurement procedures in 40 CFR part 60 appendix A, Method 20. During the performance test, one sampling site shall be located as close as practicable to the exhaust of the turbine; as provided by 6.1.1 of Method 20. A second sampling site shall be located at the outlet to the steam generating unit. Measurements of nitrogen oxides and oxygen shall be taken at both sampling sites during the performance test. The nitrogen oxides emission rate from the combined cycle system shall be calculated by subtracting the nitrogen oxides emission rate measured at the sampling site and at the outlet from the turbine from the nitrogen oxides emission rate measured at the sampling site at the outlet from the steam generating unit. [40 CFR §60.46b(f)]

d. The owner shall record and maintain records of the amounts of fuel combusted during each day and calculate the annual capacity factor individually for each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. [40 CFR §60.49b(d)]

e. All records required under the section shall be maintained by the owner or operator of the facility for a period of 2 years following the date of such record. [40 CFR §60.49b(o)]

[§19.304 and 40 CFR Part 60, Subpart Db]

30. The following notifications to the Department are required for the combustion turbines and the duct burners:

a. date of construction commenced postmarked no later than 30 days after such date,
b. anticipated date of initial start-up between 30-60 days prior to such date,
c. actual date of initial start-up postmarked within 15 days after such date,
d. CEMS, opacity, and emissions performance testing postmarked not less than 30 days prior to testing.

[§19.304 and 40 CFR §60.7(a)]

Acid Rain Program

31. The affected units (SN-01 thru SN-07) are subject to and shall comply with applicable provisions of the Acid Rain Program. [40 CFR Parts 72, 73, and 75]

32. The permittee shall ensure that the continuous emissions monitoring systems are in operation and monitoring all unit emissions at all times, except during periods of calibration, quality assurance, preventative maintenance or repair, periods of backups of data from the data acquisition and handling system, or recertification. [40 CFR §75.10]

33. The permittee shall monitor SO_2 emissions using data protocol procedures outlined in 40 CFR Part 75, Appendix D. Data shall be kept in accordance with 40 CFR Part 75, Subpart F and submitted to EPA according to 40 CFR Part 75, Subpart F. Data shall be made available to Department personnel upon request. [40 CFR Part §75.11 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

34. The permittee shall monitor NO_x emissions and O_2 diluent concentration using data protocol procedures outlined in 40 CFR Part 75, Appendix E. Data shall be kept in accordance with 40 CFR Part 75, Subpart F and submitted to EPA according to 40 CFR Part 75, Subpart F. Data shall be made available to Department personnel upon request. [40 CFR Part §75.12 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

35. The permittee shall monitor CO_2 emissions using data protocol procedures outlined in 40 CFR Part 75, Appendix G. Data shall be kept in accordance with 40 CFR Part 75, Subpart F and submitted to EPA according to 40 CFR Part 75, Subpart F. Data shall be made available to Department personnel upon request. [40 CFR Part §75.13 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-08
Emergency Diesel Generator

Source Description

The emergency diesel generator will consist of a diesel fueled internal combustion engine and an electrical generator. The generator will have a nominal rating of 850 kW and will be permitted to operate 800 hours per year.

Specific Conditions

36. The permittee shall not exceed the emission rate set forth in the following table. The hourly emission rate set forth in the following table is based on maximum capacity. Compliance with the tpy emission rate set forth in the following table shall be demonstrated by Specific Conditions 40 and 41. [§19.501, §19.901, and 40 CFR Part 52 Subpart E]

Emission Unit	Pollutant	lb/hr	tpy
Emergency Diesel Generator	PM_{10}	0.9	0.4
	SO_2	0.6	0.2
	VOC	0.8	0.4
	CO	6.9	2.8
	NO_x	30.1	12.0

37. The permittee shall not exceed the emission rate set forth in the following table. The hourly emission rate set forth in the following table is based on maximum capacity. Compliance with the tpy emission rate set forth in the following table shall be demonstrated by Specific Conditions 40 and 41. [§18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Emission Unit	Pollutant	lb/hr	tpy
Emergency Diesel Generator	PM	0.9	0.4

38. The permittee shall not cause to be discharged to the atmosphere from the emergency diesel generator stack gases which exhibit an opacity greater than 20%. [§19.503 and 40 CFR Part 52, Subpart E]

39. Visible Emissions observations of the opacity from source SN-08 shall be conducted by a person trained in EPA Reference Method 9 every 5 years. If visible emissions appear to be in excess of 20%, the permittee shall immediately take action to identify the cause of the excess visible emissions, implement corrective action, and document that visible emissions do not appear to be in excess of the permitted opacity following the corrective

action. The permittee shall maintain records of any visible emissions which appeared to be in excess of the permitted opacity, the corrective action taken, and if visible emissions were present following the corrective action. These records shall be kept on site and made available to Department personnel upon request. [§19.705 and 40 CFR Part 52, Subpart E]

40. The emergency diesel generator may only fire low sulfur diesel fuel. [§18.1004, §19.705, §19.901, 40 CFR Part 52 Subpart E, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6]

41. Operation of the emergency diesel generator shall be limited to 800 hours per twelve consecutive months. Compliance shall be based on a monthly calculation of the 12-month rolling total operating hours. [§18.1004, §19.705, §19.901, 40 CFR Part 52 Subpart E, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR §70.6]

42. The permittee shall maintain records to demonstrate compliance with Specific Conditions 40 and 41. These records shall be updated on a monthly basis. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes. [§18.1004, §19.705, 40 CFR Part 52 Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

SN-09
Cooling Tower

Source Description

The cooling towers will consist of mechanical draft vents with drift eliminators.

Specific Conditions

43. The permittee shall not exceed the emission rate set forth in the following table. The emission rates set forth in the following table are based on maximum capacity. [§19.501, §19.901, and 40 CFR Part 52 Subpart E]

Emission Unit	Pollutant	lb/hr (24-hr average)	tpy
Cooling Tower	PM_{10}	0.7	2.8

44. The permittee shall not exceed the emission rate set forth in the following table. The emission rates set forth in the following table are based on maximum capacity. [§18.801 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

Emission Unit	Pollutant	lb/hr (24-hr average)	tpy
Cooling Tower	PM	1.9	7.9

45. The permittee shall not cause to be discharged to the atmosphere from the cooling tower stack gases which exhibit an opacity greater than 20%. Compliance with this opacity limit shall be demonstrated by Specific Condition 46. [§19.503 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

46. The total dissolved solids content shall not exceed 4000 parts per million. [§19.705, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6]

47. The permittee shall monitor weekly the total dissolved solids to demonstrate compliance with Specific Condition 46. These records shall be updated on a monthly basis. During any week when the cooling towers do not operate the TDS testing shall not be required. Records shall be maintained to verify operations. These records shall be kept on site, provided to Department personnel upon request, and may be used by the Department for enforcement purposes. [§19.705, and 40 CFR Part 52, Subpart E]

SECTION V: COMPLIANCE PLAN AND SCHEDULE

Wrightsville Power Facility, LLC will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. The permittee shall notify the Director in writing within thirty (30) days after commencing construction, completing construction, first placing the equipment and/or facility in operation, and reaching the equipment and/or facility target production rate. [Regulation 19, §19.704, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

2. If the permittee fails to start construction within eighteen months or suspends construction for eighteen months or more, the Director may cancel all or part of this permit. [Regulation 19, §19.410(B) and 40 CFR Part 52, Subpart E]

3. The permittee must test any equipment scheduled for testing, unless stated in the Specific Conditions of this permit or by any federally regulated requirements, within the following time frames: (1) new equipment or newly modified equipment within sixty (60) days of achieving the maximum production rate, but no later than 180 days after initial start up of the permitted source or (2) operating equipment according to the time frames set forth by the Department or within 180 days of permit issuance if no date is specified. The permittee must notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. The permittee shall submit the compliance test results to the Department within thirty (30) days after completing the testing. [Regulation 19, §19.702 and/or Regulation 18 §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

4. The permittee must provide: [Regulation 19, §19.702 and/or Regulation 18, §18.1002 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

    a. Sampling ports adequate for applicable test methods;
    b. Safe sampling platforms;
    c. Safe access to sampling platforms; and
    d. Utilities for sampling and testing equipment.

5. The permittee must operate the equipment, control apparatus and emission monitoring equipment within the design limitations. The permittee shall maintain the equipment in good condition at all times. [Regulation 19, §19.303 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

6. This permit subsumes and incorporates all previously issued air permits for this facility. [Regulation 26 and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

Acid Rain (Title IV)

7. The Director prohibits the permittee to cause any emissions exceeding any allowances the source lawfully holds under Title IV of the Act or the regulations promulgated under the Act. No permit revision is required for increases in emissions allowed by allowances

acquired pursuant to the acid rain program, if such increases do not require a permit revision under any other applicable requirement. This permit establishes no limit on the number of allowances held by the permittee. However, the source may not use allowances as a defense for noncompliance with any other applicable requirement of this permit or the Act. The permittee will account for any such allowance according to the procedures established in regulations promulgated under Title IV of the Act. [Regulation 26, §26.701 and 40 CFR 70.6(a)(4)]

Title VI Provisions

8. The permittee must comply with the standards for labeling of products using ozone-depleting substances. [40 CFR Part 82, Subpart E]

    a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
    b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
    c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
    d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

9. The permittee must comply with the standards for recycling and emissions reduction, except as provided for MVACs in Subpart B. [40 CFR Part 82, Subpart F]

    a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
    b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
    c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
    d. Persons disposing of small appliances, MVACs, and MVAC like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC like appliance" as defined at §82.152)
    e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
    f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

10. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

11. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

    The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC 22 refrigerant.

12. The permittee can switch from any ozone depleting substance to any alternative listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G.

Permit Shield

13. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item a. of this condition.

    a. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated April 29, 1999 and subsequent correspondence.

Source	Regulation	Description
Facility	Arkansas Regulation #19	Regulations of the Arkansas State Implementation Plan for Air Pollution Control
Facility	Arkansas Regulation #26	Regulations of the Arkansas Operating Permit Program
Facility	40 CFR §52.21	Prevention of Significant Deterioration
SN-01 - SN-07	40 CFR Parts 72, 73, and 75	The Acid Rain Program
SN-01 - SN-07	40 CFR Part 60 Subpart A	General Provisions
SN-01 - SN-07	40 CFR Part 60 Subpart GG	Standards of Performance for Stationary Gas Turbines

Source	Regulation	Description
SN-01 - SN-07	40 CFR Part 60 Subpart Db	New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units

b. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated April 29, 1999 and subsequent correspondence.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
Compliance Assurance Monitoring	40 CFR Part 64	SN-01 - SN-07	Because none of the emission units use a control device as defined under Part 64.
Compliance Assurance Monitoring	40 CFR Part 64	SN-08 - SN-09	Because none of the emission units have a potential pre-control device emissions in the amounts of tons per year required to classify the unit as a major source under Part 70.
National Emissions Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers	40 CFR Part 63 Subpart Q	Cooling Tower (SN-09)	The facility will not be a major source of HAPs. The facility will not operate the cooling tower with chromium based water treatment chemicals.
Portion of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.	40 CFR 60.49b(g) and (b)	Duct Burners (SN-01 - SN-07)	Pursuant to 40 CFR 60.48b(h) a continuous monitoring system for NOx is not required for the duct burners. Therefore these two paragraphs do not apply because the provisions are applicable to affected facilities required to install a continuous monitoring system.

c. Nothing in this permit shall alter or affect the following:

i. Provisions of Section 303 of the Clean Air Act;
ii. The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;
iii. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or
iv. The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

SECTION VII: INSIGNIFICANT ACTIVITIES

The following sources are insignificant activities. Any activity that has a state or federal applicable requirement shall be considered a significant activity even if this activity meets the criteria of §26.304 of Regulation 26 or listed in the table below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated August 27, 2004.

Description	Category
9.9 MMBtu/hr natural gas fired fuel heater	A-1
Diesel Storage Tank (70 gallons)	A-3
Emergency Fire Pump	A-11

SECTION VIII: GENERAL PROVISIONS

1. Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 et seq.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute. [40 CFR 70.6(b)(2)]

2. This permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later. [40 CFR 70.6(a)(2) and §26.701(B) of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), effective August 10, 2000]

3. The permittee must submit a complete application for permit renewal at least six (6) months before permit expiration. Permit expiration terminates the permittee's right to operate unless the permittee submitted a complete renewal application at least six (6) months before permit expiration. If the permittee submits a complete application, the existing permit will remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due. [Regulation 26, §26.406]

4. Where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, et seq. (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, the permit incorporates both provisions into the permit, and the Director or the Administrator can enforce both provisions. [40 CFR 70.6(a)(1)(ii) and Regulation 26, §26.701(A)(2)]

5. The permittee must maintain the following records of monitoring information as required by this permit. [40 CFR 70.6(a)(3)(ii)(A) and Regulation 26, §26.701(C)(2)]

    a. The date, place as defined in this permit, and time of sampling or measurements;
    b. The date(s) analyses performed;
    c. The company or entity performing 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.

6. The permittee must retain the records of all required monitoring data and support information for at least five (5) years from the date of the monitoring sample,

measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [40 CFR 70.6(a)(3)(ii)(B) and Regulation 26, §26.701(C)(2)(b)]

7. The permittee must submit reports of all required monitoring every six (6) months. If permit establishes no other reporting period, the reporting period shall end on the last day of the anniversary month of the initial Title V permit. The report is due within thirty (30) days of the end of the reporting period. Although the reports are due every six months, each report shall contain a full year of data. The report must clearly identify all instances of deviations from permit requirements. A responsible official as defined in Regulation No. 26, §26.2 must certify all required reports. The permittee will send the reports to the address below: [40 C.F.R. 70.6(a)(3)(iii)(A) and Regulation 26, §26.701(C)(3)(a)]

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

8. The permittee shall report to the Department all deviations from permit requirements, including those attributable to upset conditions as defined in the permit.

a. For all upset conditions (as defined in Regulation19, § 19.601), the permittee will make an initial report to the Department by the next business day after the discovery of the occurrence. The initial report my be made by telephone and shall include:

i. The facility name and location
ii. The process unit or emission source deviating from the permit limit,
iii. The permit limit, including the identification of pollutants, from which deviation occurs,
iv. The date and time the deviation started,
v. The duration of the deviation,
vi. The average emissions during the deviation,
vii. The probable cause of such deviations,
viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
ix. The name of the person submitting the report.

The permittee shall make a full report in writing to the Department within five (5) business days of discovery of the occurrence. The report must include, in addition to the information required by the initial report, a schedule of actions taken or planned to eliminate future occurrences and/or to minimize the amount the permit's limits were exceeded and to reduce the length of time the limits were exceeded. The

permittee may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence, and the report will serve as both the initial report and full report.

b. For all deviations, the permittee shall report such events in semi-annual reporting and annual certifications required in this permit. This includes all upset conditions reported in 8a above. The semi-annual report must include all the information as required by the initial and full reports required in 8a.

[Regulation 19, §19.601 and §19.602, Regulation 26, §26.701(C)(3)(b), and 40 CFR 70.6(a)(3)(iii)(B)]

9. If any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity will not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable. [40 CFR 70.6(a)(5), Regulation 26, §26.701(E), and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

10. The permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation 26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. §7401, et seq. and is grounds for enforcement action; for permit termination, revocation and reissuance, for permit modification; or for denial of a permit renewal application. [40 CFR 70.6(a)(6)(i) and Regulation 26, §26.701(F)(1)]

11. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit. [40 CFR 70.6(a)(6)(ii) and Regulation 26, §26.701(F)(2)]

12. The Department may modify, revoke, reopen and reissue the permit or terminate the permit for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [40 CFR 70.6(a)(6)(iii) and Regulation 26, §26.701(F)(3)]

13. This permit does not convey any property rights of any sort, or any exclusive privilege. [40 CFR 70.6(a)(6)(iv) and Regulation 26, §26.701(F)(4)]

14. The permittee must furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee must also furnish to the Director copies of records required by the permit. For information the permittee claims confidentiality, the Department may require the permittee to furnish such records directly to the Director

along with a claim of confidentiality. [40 CFR 70.6(a)(6)(v) and Regulation 26, §26.701(F)(5)]

15. The permittee must pay all permit fees in accordance with the procedures established in Regulation 9. [40 CFR 70.6(a)(7) and Regulation 26, §26.701(G)]

16. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes provided for elsewhere in this permit. [40 CFR 70.6(a)(8) and Regulation 26, §26.701(H)]

17. If the permit allows different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the operational scenario. [40 CFR 70.6(a)(9)(i) and Regulation 26, §26.701(I)(1)]

18. The Administrator and citizens may enforce under the Act all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, unless the Department specifically designates terms and conditions of the permit as being federally unenforceable under the Act or under any of its applicable requirements. [40 CFR 70.6(b) and Regulation 26, §26.702(A) and (B)]

19. Any document (including reports) required by this permit must contain a certification by a responsible official as defined in Regulation 26, §26.2. [40 CFR 70.6(c)(1) and Regulation 26, §26.703(A)]

20. The permittee must allow an authorized representative of the Department, upon presentation of credentials, to perform the following: [40 CFR 70.6(c)(2) and Regulation 26, §26.703(B)]

    a. Enter upon the permittee's premises where the permitted source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records required 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 Act, sample or monitor at reasonable times substances or parameters for assuring compliance with this permit or applicable requirements.

21. The permittee shall submit a compliance certification with the terms and conditions contained in the permit, including emission limitations, standards, or work practices. The permittee must submit the compliance certification annually within 30 days following the last day of the anniversary month of the initial Title V permit. The permittee must also

submit the compliance certification to the Administrator as well as to the Department. All compliance certifications required by this permit must include the following: [40 CFR 70.6(c)(5) and Regulation 26, §26.703(E)(3)]

a. The identification of each term or condition of the permit that is the basis of the certification;
b. The compliance status;
c. Whether compliance was continuous or intermittent;
d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit;
e. and Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and §504(b) of the Act.

22. Nothing in this permit will alter or affect the following: [Regulation 26, §26.704(C)]

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
b. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act or,
d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. This permit authorizes only those pollutant emitting activities addressed in this permit. [A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311]

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

Request for PDS Invoice	
Invoice Number *(assigned when invoice printed)*	PDS-

AFIN ✱	60-01380			
Name *(for confirmation only)*	Wrightsville Power Facility, LLC			
Invoice Type (pick one) ✱	Initial	Mod	Variance	
	Annual	**Renewal ✓**	Interim Authority	
Permit Number ✱	1842-AOP-R3			
Media Code ✱	A			
Fee Code or Pmt Type✱	T5			
Fee Description *(for confirmation only)*	Title V			
Amount Due ✱ *(whole dollar amount only)*	$0			
Printed Comment *(600 characters maximum)*	No mod renewal.			

Note: The information below is for use by the requesting division if desired; it will not print on the invoice.	
Engineer	Bryan Leamons
Paid? (yes/no)	
Check number	
Comments	

✱ **Required data***(See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)*

Request submitted by:		Date:	

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

Wrightsville Power Facility, LLC, located at 17400 Highway 365 South, Wrightsville, AR 72183 has applied for renewal to their existing Title V Operating Air Permit (AFIN: 60-01380). Upon final approval and issuance by the Department, the permittee will be issued the renewal with no modifications and no changes to permitted emissions or operating methods.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Bryan Leamons, Engineer. Both Doug Szenher and Bryan Leamons can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Little Rock Public Library located at 100 South Rock, Little Rock, Arkansas 72201. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Marcus C. Devine
Director