ADEQ
OPERATING
AIR PERMIT

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

Permit No. : 1987-AOP-R1
Renewal #1
IS ISSUED TO:
Hot Spring Power Company, LP
Highway 270, 6 Miles West of Malvern
Malvern, AR 72104
Hot Spring County
AFIN: 30-00337

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:

_____ _____

Mike Porta Date
Interim Chief, Air Division

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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
PM_{10}	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:	Hot Spring Power Company, LP
AFIN:	30-00337
PERMIT NUMBER:	1987-AOP-R1
FACILITY ADDRESS:	Highway 270, 6 Miles West of Malvern Malvern, AR 72104
MAILING ADDRESS:	410 Henderson Road Malvern, AR 72104
COUNTY:	Hot Spring
CONTACT POSITION:	David Mailloux
TELEPHONE NUMBER:	501-467-3232
REVIEWING ENGINEER:	Bryan Leamons
UTM North South (Y):	3809.7
UTM East West (X):	515.4
Zone:	15

SECTION II: INTRODUCTION

Summary of Permit Activity

Suez Energy Generation owns and operates Hot Spring Power Company, LP (HSPC) in Malvern, Hot Spring County, Arkansas. The cogeneration facility consists of two natural gas-fired combustion turbines with heat recovery steam generator (each equipped with fired duct burner) coupled with a single steam turbine and associated equipment. Cooling towers are also permitted.

This permit issuance completes renewal requirement of Arkansas Regulation 26 and 40 CFR Part 70. Modifications are incorporated with this permit. The facility is permitted to operate 40 CFR 60, Subpart Db affected duct burners (SN-01 and 02). The previous permit was issued for 40 CFR 60, Subpart Da affected duct burners at these units. Affected conditions are updated. Another modification involves HAP emission limits. Stack testing has shown that formaldehyde is slightly above what was previously permitted. Other HAPs are lower. Emission limits are updated accordingly. A permit shield is also added with this renewal.

Changes to the permit are also made in regards to updates to 40 CFR 60, Subpart GG. This rule has changed allowing alternatives to emission monitoring requirements. Affected conditions are updated.

40 CFR Part 64, Compliance Assurance Monitoring (CAM) is addressed for applicable units. There are no CAM affected units at the facility at this time. The combustion turbines/ duct burners (SN-01 and 02) are subject to Federal Acid Rain Requirements and are therefore exempted for CO and NO_x CAM requirements. Also, the catalytic oxidizers on SN-01 and 02 control pre-control VOC emissions that are below major source thresholds eliminating CAM requirements. The Auxiliary Boilers utilize low NO_x burner design and the cooling towers utilize drift eliminating baffle design for minimizing emissions. Equipment found on the Auxiliary Boilers and Cooling Towers are passive emissions reducing devices and are not considered “add-on” pollution control devices for the purposes of CAM. These units are therefore not subject to CAM.

A typographical error is corrected with this permit revision. Previously, the SN-01/SN-02 combined VOC limit was listed at 63.4 tons per year. This was an error; it should be 70.2 tons per year. This correction does not affect past regulatory applications, including BACT analysis. BACT would have been triggered in either case and the analysis was performed using the correct figures.

Process Description

Combustion Turbine Units (SN-01 and SN-02)
Ambient air is drawn through an air filtration intake structure into the inlet compressor section of the combustion turbine, mixed with natural gas, and burned. The hot gases exhaust through rows of stationary vanes and rotating blades. The rotating turbine drives generators to produce electrical power for distribution. Each combustion turbine is capable of producing a nominal 230 megawatts (MW) of electricity. The exhaust gases then pass through a Heat Recovery Steam Generator (HRSG) where boiler feed water is converted into steam. The steam is used to drive a steam turbine, which produces a nominal 350 MW of electricity. Each of the HRSGs is equipped with a duct burner to provide additional heat to generate 40.5 MW of electricity during peak demands. The facility incorporates a two-on-one, combined cycle configuration, i.e., two combustion turbine units and one steam turbine. The combustion turbines and duct burners are fired solely by natural gas. Normal operation consists of both combustion turbines and HRSG units operating at base load without supplemental firing from the duct burners. Good combustion controls along with natural gas firing are employed to reduce emissions of sulfur dioxide (SO2 and PM10). An oxidation catalyst is used to reduce CO and VOC (including organic HAPs) emissions. Dry low-NOx (DLN) technology, coupled with selective catalytic reduction (SCR), is used to minimize NO_x emissions. Operation of the SCR involves the injection of aqueous ammonia into the exhaust gas stream ahead of a catalyst bed. After passing through the oxidation catalyst and SCR, the exhaust gases are vented to the atmosphere through dedicated stacks (SN-01 and SN-02).

Ammonia Storage (Insignificant)
Aqueous ammonia arrives on-site via tank truck. The on-site ammonia storage vessels are equipped with pressure vent valves with settings to minimize standing loss emissions. The aqueous ammonia is pumped from the storage vessel to an ammonia injection skid via aboveground piping. The aqueous ammonia is injected through a series of nozzles into the exhaust gas stream within the HRSG just upstream of the catalyst.

Water Treatment (Insignificant)
Raw water is demineralized through an on-site water treatment system and stored in aboveground tanks. The demineralized water is routed to the HRSG for steam production.

Cooling Tower Cells (SN-04 through SN-l5)
Condensers are used to condense the steam across the steam turbine to promote efficiency. Cooling water used in the condensers is provided by a mechanical draft wet cooling tower with twelve cells (SN-04 through SN-15). Routine water treatment chemicals are used in the cooling tower to promote efficient operation.

Emergency Diesel Firewater Pump (Insignificant)
An emergency diesel engine-driven fire water pump is used when power is unavailable and during routine testing.

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
New Source Performance Standards (NSPS): 40 CFR Part 60, Subpart GG, *Standards of Performance for Stationary Gas Turbines*; 40 CFR Part 60, Subpart Db, *Standards of Performance Industrial - Commercial - Institutional Steam Generating Units*;
Federal Acid Rain Program - 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	80.4	239.8
		PM_{10}	80.4	239.8
		SO_2	9.6	13.2
		VOC	34.6	70.2
		CO	180.6	615.0
		NO_x	86.6	294.6
HAPs		1,3-Butadiene*	0.2	0.5
		Acetaldehyde*	0.2	0.5
		Acrolein*	0.2	0.5
		Benzene*	0.2	0.5
		Formaldehyde*	1.0	3.8
		Hexane*	0.6	1.3
		Naphthalene*	0.2	0.5
		PAH*	0.2	0.5
		Propylene Oxide*	0.2	0.5
		Toluene*	0.2	0.5
		Xylene*	0.2	0.5
Air Contaminants		Ammonia**	91.6	311.6
		Ammonium Sulfate**	4.4	6.0

EMISSION SUMMARY				
Source Number	Description	Pollutant	Emission Rates	
			lb/hr	tpy
01	Combustion Turbine/HRSG/Duct Burner Unit 1			total tpy SN-01 & SN-02
		PM	39.8	236.6
		PM_{10}	39.8	236.6
		SO_2	4.8	13.2
		VOC	17.3	70.2
		CO	90.3	615.0
		NO_x	43.3	294.6
		1,3-Butadiene	0.1	0.5
		Acetaldehyde	0.1	0.5
		Acrolein	0.1	0.5
		Benzene	0.1	0.5
		Formaldehyde	0.5	3.8
		Hexane	0.3	1.3
		Naphthalene	0.1	0.5
		PAH	0.1	0.5
		Propylene Oxide	0.1	0.5
		Toluene	0.1	0.5
		Xylene	0.1	0.5
		Ammonia	45.8	311.6
		Ammonium Sulfate	2.2	6.0
02	Combustion Turbine/HRSG/Duct Burner Unit 2	PM	39.8	See total tpy for SN-01& SN-02 above
		PM_{10}	39.8	
		SO_2	4.8	
		VOC	17.3	
		CO	90.3	
		NO_x	43.3	
		1,3-Butadiene	0.1	
		Acetaldehyde	0.1	
		Acrolein	0.1	
		Benzene	0.1	
		Formaldehyde	0.5	
		Hexane	0.3	
		Naphthalene	0.1	
		PAH	0.1	
		Propylene Oxide	0.1	
		Toluene	0.1	
		Xylene	0.1	
		Ammonia	45.8	
		Ammonium Sulfate	2.2	
04-15	Cooling Tower Cells	PM	0.8	3.2
		PM_{10}	0.8	3.2

*HAPs included in the VOC totals. Other HAPs are not included in any other totals unless specifically stated.
**Air Contaminants such as ammonia, acetone, and certain halogenated solvents are not VOCs or HAPs.

SECTION III: PERMIT HISTORY

1987-AOP-R0, issued November 9, 2001, was the initial operating permit for the facility. It permitted the construction of a combined cycle cogeneration facility with two combustion turbines equipped with heat recovery steam generator/duct burner units. This permit triggered PSD review for several pollutants at all units. The following table summarizes the BACT determinations for affected units and pollutants.

Pollutant	SN-01 and SN-02	SN-04 through SN-15
NO_x	Dry low-NO_x and SCR (3.5 ppmvd @ 15% O_2 24 hour average)	NA
CO	CO/ VOC Oxidation Catalyst (12 ppmvd @ 15% O_2 24 hour average)	NA
VOC	CO/ VOC Oxidation Catalyst (4.0 ppmvd @ 15% O_2)	NA
PM_{10}	Good operating practice (0.013 lb/MMBtu)	high efficiency drift eliminator (0.81 lb/hr; 0.0005% drift factor)

SECTION IV: SPECIFIC CONDITIONS

SN-01 and SN-02
Combustion Turbine/HRSG/Duct Burner Units 1 and 2

The facility uses a two-on-one configuration - two Siemens/Westinghouse 501G combustion turbines (providing nominal 230 MW each) each coupled with heat recovery steam generator/duct burner which provides steam for one steam turbine (providing additional nominal generating capacity of 700 MW to a maximum capacity of 815 MW with the firing of the duct burners). The combustion turbines and duct burners are fired solely by natural gas. Normal operation consists of both combustion turbine and HRSG units operating at base load without supplemental firing from duct burners. The units are expected to operate continuously (8,760 hours per year), except for maintenance and repair activities or during periods of low electrical demand. The duct burners are fired to meet peak electrical demands at a maximum of 2,500 hours per year.

The turbine has a total heat consumption rate of approximately 2,200 MMBtu/hour, but this varies with ambient conditions and operational load. The duct burners have a maximum firing rate of 250 MMBtu/hour, high heating value (HHV).

Good combustion controls along with natural gas firing are employed to reduce emissions of SO_2 and PM_{10}. An oxidation catalyst is used to reduce annual VOC and CO concentrations in the stack to 4.0 parts per million by volume dry (ppmvd) and 12.0 ppmvd, respectively corrected to 15% oxygen, while operating at ambient conditions as base load operations. Dry low-NO_x (DLN) technology, coupled with a selective catalytic reduction (SCR) unit, is used to minimize combustion turbine and duct burner NO_x emissions to 3.5 ppmvd, corrected to 15% oxygen, for natural gas firing. The operation of the SCR involves the injection of aqueous ammonia into the exhaust gas stream ahead of a catalyst bed.

Specific Conditions

Particulate Matter and Opacity

1. The permittee shall not exceed the emission rates set forth in the following table at SN-01 or SN-02. Compliance with this condition shall be demonstrated by the testing requirements of Specific Condition 5. [§19.501 and §19.901 et seq. of the *Regulations of the Arkansas Plan of Implementation for Air Pollution Control* (Regulation 19) effective December 19, 2004 and 40 CFR Part 52, Subpart E]

   The hourly emission rates set forth in the following table were based on a worst-case scenario.

Pollutant	lb/hr	Averaging Period
PM	39.8	Per EPA Reference Method 5
PM_{10}	39.8	Per EPA Reference Method 5

2. The permittee shall not exceed the annual emission rates set forth in the following table at SN-01 and SN-02 combined. [§19.501, §19.901, 40 CFR 52, Subpart E]

   Initial compliance with the annual emission rates set forth in the following table has been demonstrated by the initial performance testing of the CT/HRSG/duct burner stacks for PM/PM_{10}. Continuing compliance with the annual emission rates shall be demonstrated by permitting these sources at maximum annual rates and any required stack testing. Maximum annual emission rates are based on an average ambient temperature and limited annual duct-burner firing.

Pollutant	tons per consecutive 12 months
PM	236.6
PM_{10}	236.6

3. The permittee shall comply with the following BACT determinations for SN-01 and SN-02. Compliance with the emission levels set forth in the following table shall be demonstrated by the performance testing requirements of Specific Condition 5. [§19.901and 40 CFR 52, Subpart E]

Pollutant	BACT Determination		
PM_{10}	good combustion practices and clean fuels	0.013 lb/MM Btu	3-hr avg.

4. The permittee shall not cause to be discharged to the atmosphere from SN-01 or SN-02 stack gases which exhibit greater than 5% opacity averaged over a six minute period. Compliance with this opacity limit shall be demonstrated by the use of natural gas as the only permitted fuel. [§18.501 and A.C.A.]

5. The permittee shall test one of the two of SN-01 or SN-02 every five years to demonstrate compliance with the limits specified in Specific Conditions 1 and 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 in combined cycle mode at greater than or equal to 90% of the maximum operating load. The permittee shall perform, at minimum, a stack test

on one of the two CT/HRSG/duct burner exhaust stacks. Testing shall otherwise be performed in accordance with Plantwide Condition 3. Required testing may be performed in single cycle mode so long as the duct-burners remain locked-out of operation. If duct burners are made operational, testing is required again according to testing timelines for new equipment as specified in Plantwide Condition 3. [§19.702, §19.901, and 40 CFR 52 Subpart E]

Sulfur Dioxide

6. The permittee shall not exceed the emission rates set forth in the following table at SN-01 or SN-02. Compliance with this condition will be demonstrated by the monitoring requirements of Specific Condition 8. [§19.501 and 40 CFR 52, Subpart E]

   The hourly emission rates set forth in the following table were based on a worst-case scenario.

Pollutant	lb/hr
SO_2	4.8

7. The permittee shall not exceed the emission rates set forth in the following table at SN-01 and SN-02 combined. Compliance shall be based on compliance with Specific Condition 8. [§19.501 and 40 CFR 52, Subpart E]

Pollutant	tons per consecutive twelve months
SO_2	13.2

8. The monitoring requirements relative to SO_2 emissions from the CT/HRSG/duct burner exhausts shall be as follows: [§19.703, 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]

   a. The permittee shall only combust natural gas as defined in 40 CFR §60.331(u). This requirement relieves the previous requirements for NSPS Subpart GG fuel sulfur content monitoring.
   b. The permittee shall conduct SO_2 emissions monitoring procedures in accordance with, Appendix D of 40 CFR Part 75. These procedures shall include monitoring the fuel sulfur content of the fuel rounded to the nearest 0.1 grains per 100 SCF. Alternative procedures may 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.
   c. The permittee shall maintain records which demonstrate compliance with 8.a and 8.b. Records shall be submitted in accordance with General Provision 7.

Volatile Organic Compounds

9. The permittee shall not exceed the emission rates set forth in the following table at SN-01 or SN-02. Compliance shall be demonstrated by initial performance testing required by Specific Condition 12. [§19.501, §19.901, and 40 CFR 52, Subpart E]

The hourly emission rates set forth in the following table were based on a worst-case scenario.

Pollutant	lb/hr	Averaging Period
VOC	17.3	3-hour

10. The permittee shall not exceed the emission rates set forth in the following table at SN-01 and SN-02 combined. [§19.501, §19.901, and 40 CFR 52, Subpart E]

Initial compliance with the annual emission rates set forth in the following table has been demonstrated by the initial performance test on one of the two of SN-01 or SN-02 for VOC. Continuing compliance with the annual emission rates shall be demonstrated by permitting these sources at maximum annual rates and any required testing. Maximum annual emission rates are based on an average ambient temperature and limited annual duct-burner firing.

Pollutant	tons per consecutive twelve months
VOC	70.2

11. The permittee shall comply with the following BACT determinations for SN-01 and SN-02. Compliance with the emission levels set forth in the following table shall be demonstrated by the performance test of one of the two of SN-01 or SN-02 for VOC. [§19.901and 40 CFR 52, Subpart E]

Pollutant	BACT Determination	
VOC	Catalytic Oxidation	4.0 ppmvd @ 15% O_2

12. The permittee shall test either one of SN-01 or SN-02 every five years to demonstrate compliance with the limits specified in Specific Conditions 9 and 11. Testing shall be performed in accordance with Plantwide Condition 3 and EPA Reference Method 25A as found in 40 CFR Part 60 Appendix A. Testing shall be performed in combined cycle mode at greater than or equal to 90% of the maximum operating load. Required testing may be performed in single cycle mode so long as the duct-burners remain locked-out of

operation. If duct burners are made operational, testing is required again according to testing timelines for new equipment as specified in Plantwide Condition 3. [§19.702, §19.901, and 40 CFR 52, Subpart E]

Carbon Monoxide

13. The permittee shall not exceed the emission rates set forth in the following table at SN-01 or SN-02. Initial compliance has been demonstrated by initial performance testing. Ongoing compliance shall be demonstrated by the CO CEMS required by Specific Condition 17. [§19.501, §19.901, and 40 CFR 52, Subpart E]

Pollutant	lb/hr	Averaging Period
CO	90.3	24-hour

14. The permittee shall not exceed the emission rates set forth in the following table at SN-01 and SN-02 combined. Compliance shall be demonstrated by compliance with Specific Condition 13 and duct burner firing limits. [§19.501, §19.901, and 40 CFR 52, Subpart E]

Pollutant	tons per consecutive twelve months
CO	615.0

15. The permittee shall comply with the following BACT determinations for SN-01 and SN-02. Initial compliance with the emission levels set forth in the following table has been demonstrated by the performance test of one of the two combustion turbine/heat recovery steam generating unit stacks for CO. Ongoing compliance shall be demonstrated by operation of CEMS as required by Specific Condition 17 and any stack testing requirements. [§19.901and 40 CFR 52, Subpart E]

Pollutant	BACT Determination	
CO	CO oxidation catalyst	12 ppmvd @ 15% O_2 24 hour average

16. Reserved.

17. The permittee shall install, maintain, and operate a CO CEMS on each CT/HRSG/duct burner exhaust stack. The CEMS shall comply with the ADEQ CEMS Conditions. A copy is provided in Appendix A. The CEMS data may be used by the Department for enforcement purposes. The CEMS shall be used to demonstrate compliance with the CO emission limits specified in Specific Conditions 13, 14, and 15. [§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 at SN-01 or SN-02. Initial compliance has been demonstrated by initial performance testing. Ongoing compliance shall be demonstrated by the NO_x CEMS required by Specific Condition 22 and any required stack testing. [§19.501, §19.901, and 40 CFR 52, Subpart E]

Pollutant	lb/hr	Averaging Period
NO_x	43.3	24-hour

19. The permittee shall not exceed the emission rates set forth in the following table at SN-01 and SN-02 combined. Compliance shall be demonstrated by compliance with Specific Condition 18. [§19.501, §19.901, and 40 CFR 52, Subpart E]

Pollutant	tons per consecutive twelve months
NO_x	294.6

20. The permittee shall comply with the following BACT determinations for SN-01 and SN-02. Initial compliance with the emission levels set forth in the following table has been demonstrated by performance testing. Ongoing compliance shall be demonstrated by the operation of NO_x CEMS required by Specific Condition 22. [§19.901and 40 CFR 52, Subpart E]

Pollutant	BACT Determination	
NO_x	low-NO_x combustion/ SCR	3.5 ppmvd @ 15%O_2

21. Reserved.

22. The permittee shall install, maintain, and operate a NO_x CEMS on each CT/HRSG/duct burner exhaust stack. The CEMS shall comply with the ADEQ CEMS Conditions. A copy is provided in Appendix A. The CEMS data may be used by the Department for enforcement purposes. The CEMS shall be used to demonstrate compliance with Specific Conditions 18, 19, and 20. [§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]

Non-criteria Pollutants

23. The permittee shall not exceed lb/hr emission rates listed in the following table at SN-01 or SN-02. Initial compliance has been determined by performance testing requirements. Ongoing compliance with emission rates shall be demonstrated by the exclusive use of pipeline quality natural gas, duct burner operating limits, and required performance testing. [§18.801 of Regulation 18 and A.C.A.]

Pollutant	lb/hr	Averaging Period
Air Contaminants		
ammonia	45.8	per approved test method
ammonium sulfate	2.2	daily
HAPs		
1,3 butadiene	0.1	per method 18
acetaldehyde	0.1	
acrolein	0.1	‘’
benzene	0.1	
formaldehyde	0.5	‘’
hexane	0.3	
naphthalene	0.1	
PAH (polycyclic aromatics)	0.1	‘’
propylene oxide	0.1	
toluene	0.1	
xylene	0.1	‘’

24. The permittee shall not exceed ton per year emission rates listed in the following table at SN-01 and SN-02 combined. Initial compliance has been demonstrated by performance testing. Ongoing compliance shall be determined by compliance with and the exclusive use of pipeline quality natural gas, duct burner operating limits, and required performance testing. [§18.801 of Regulation 18 and A.C.A.]

Pollutant	tons per consecutive twelve months
Air Contaminants	
ammonia	311.6
ammonium sulfate	6.0
HAPs	
1,3 butadiene	0.5
acetaldehyde	0.5
acrolein	0.5
benzene	0.5
formaldehyde	3.8
hexane	1.3
naphthalene	0.5
PAH (polycyclic aromatics)	0.5
propylene oxide	0.5
toluene	0.5
xylene	0.5

25. Every five years of issuance of this permit, the permittee shall conduct a performance test for ammonia (NH_3) at one of SN-01 and SN-02 to assure compliance with Specific Condition 23 ammonia emission rates and a maximum ammonia emission level of 10 ppmvd at 15% O_2. The permittee shall use Department approved methodology. Testing on the sources shall be performed in combined cycle at greater than or equal to 90% maximum load. [§18.1002 and A.C.A.]

26. If/when SN-01 and 02 duct burners are unlocked for operation, the permittee shall conduct an initial performance test on either of SN-01 or SN-02 using Method 18 for all detectable HAPs concentrations. The test shall be performed while operating in combined cycle at greater than 90% of capacity. At this time the permittee shall also demonstrate that the facility is not a major source for HAPs (i.e. 10 tpy single HAP or 25 tpy total HAPs facility wide). Testing shall be performed in accordance with Plantwide Condition 3. [§18.1002 and A.C.A.]

Throughput Limits

27. Each CT/HRSG/duct burner unit may only fire pipeline quality natural gas. [§18.1004, §19.705, §19.901, A.C.A., and 40 CFR 70.6]

28. The duct burners at SN-01 and SN-02 shall not operate more than 5,000 hours total between the two over any twelve month period. [§18.1004, §19.705, §19.901, A.C.A., and 40 CFR 70.6]

29. The permittee shall maintain monthly records demonstrating compliance with Specific Condition 28. Records shall be updated by the fifteenth day following the month to which the records pertain. Records must include a twelve month rolling total. Records shall otherwise be submitted to the Department in accordance with General Provision 7. [§18.1004, §19.705, §19.901, A.C.A., and Part 52]

New Source Performance Standards

30. Each combustion turbine/heat recovery steam generating unit 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* (Included in Appendix B). Applicable provisions of Subpart GG include but are not limited to, the following: [§19.304, and 40 CFR Part 60, Subpart GG]

    a. The permittee shall not exceed a NO_X emission level of 75 ppmvd at 15% oxygen on a dry basis. Compliance shall be demonstrated by compliance with Specific Condition 22. [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 compliance with Specific Condition 8.a. [40 CFR §60.333(b)]
    c. If/when SN-01 and SN-02 duct burners are unlocked for operation, initial compliance testing for NO_X and SO_2 is required within 180 days after start-up. Compliance with the fuel sulfur testing and monitoring requirements will be demonstrated by compliance with Specific Condition 8.a. [40 CFR §60.335 and §60.8]

        The NO_X performance testing shall be conducted in accordance with test methods in 40 CFR Part 60 Appendix A or alternative approved methods. The testing shall be conducted at four points in the normal operating range of the turbines including the minimum point in the range and at the full load. Compliance with these NO_x performance testing requirements may be waived with EPA's approval of the use of CEMS required by Specific Condition 22 to demonstrate compliance with the NO_x standard.

31. The Duct Burners in the CT/HRSG system (SN-01 and SN-02) shall comply with all applicable provisions of 40 CFR Part 60, Subpart A - *General Provisions* and Subpart Db, *Standards of Performance Industrial - Commercial - Institutional Steam Generating Units*. A copy of Subpart Db is provided in Appendix C of this permit. Applicable provisions of Subpart Db include, but are not limited to the following: [§19.304, and 40 CFR Part 60, Subpart Db]

    a. NO_x emissions shall not exceed 0.2 lb/MMBtu heat input. Compliance with this condition shall be demonstrated by complying with Specific Condition 22 and testing requirements listed below. [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)]

32. The following notifications to the Department are required for SN-01 and SN-02: (a) date of construction commenced postmarked no later than 30 days after such date, (b) anticipated date of initial startup between 30-60 days prior to such date, (c) actual date of initial startup postmarked within 15 days after such date, and (d) CEMS, opacity, and emissions performance testing 30 days prior to testing. [40 CFR §60.7(a)]

Acid Rain Program

33. The affected units (SN-01 through SN-04) are subject to and shall comply with applicable provisions of the Acid Rain Program (40 CFR Parts 72, 73, and 75).

34. The submission of the NO_X, SO_2, and O_2 or CO_2 monitoring plan is required at least 45 days prior to the CEMS certification testing. Notice of CEMS certification testing is required at least 45 days prior to the CEMS certification testing. A copy of 40 CFR Part 75 is included in Appendix D. [40 CFR Part 75 (Appendix A)- Continuous Emission Monitoring Subpart G]

35. A monitoring plan is required to be submitted for NO_X, SO_2, and O_2 or CO_2 monitoring. [40 CFR Part 75 Subpart G - Continuous Emission Monitoring]

36. The initial NO_X, and O_2 or CO_2 CEMS certification testing is to occur no later than 90 days after the unit commences commercial operation except the testing must occur prior to the date this unit is declared commercial in accordance with DOE Form EIA-860. [40 CFR Part 75 Subpart A]

37. 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. [40 CFR §75.10]

Startup and Shutdown Provisions

38. 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 excess emissions from SN-01 and SN-02 unless such periods of excess startup emissions exceed a four hour period or are in violation after initial attainment of steady-state operations. Reports shall not be required during a one hour period preceding shutdown. This shall only apply for "upset conditions" which directly result from the start-up and/or shut down of one or both of the combustion turbine units (SN-01 and SN-02). All other "upset conditions" must be reported as required by Regulation 19. Additionally, the following conditions must be met during start up and shut down periods. [§19.601 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]

    a. All CEM systems for SN-01 and SN-02 must be operating during start up and shut down. The emissions recorded during these periods shall count toward the annual ton per year permit 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. "Start up" shall be defined as the period of time beginning with the first fire within the combustion turbine firing chamber until the unit(s) are operating at steady state as defined by the combustion turbine manufacturer or a maximum of four hours. "Shut down" 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 whether or not a particular unit is in steady-state operation, 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. Requirements of ADEQ CEMS Condition (II) (F) are not applicable to this permit. However, the facility shall still comply with the 40 CFR 60.7 requirements to maintain 95% CEMS uptime during non startup/ shutdown periods and 99% compliance demonstration during these periods along with the required reporting requirements.

SN-04 through SN-15
Cooling Tower Cells

Hot Spring Power Company, L.L.C. operates one 191,000 gpm twelve-cell mechanical draft wet cooling tower (SN-04 through SN-15). Wet cooling towers provide direct contact between the cooling water and the air passing through the tower. Some of the liquid water becomes entrained in the air stream and may be carried out of the tower as "drift" droplets. Particulate matter is generated when the drift droplets evaporate and leave fine particulate matter formed by the crystallization of dissolved solids. The towers use a drift eliminator capable of reducing drift to 0.0005% drift of total recirculated water.

Specific Conditions

39. The permittee shall not exceed the emission rates set forth in the following table at SN-04 through SN-15 combined. Compliance with this condition will be demonstrated by compliance with Specific Condition 43. [§19.501, §19.901, and 40 CFR 52, Subpart E]

Pollutant	lb/hr	tpy
PM_{10}	0.8	3.2

40. The permittee shall not exceed the emission rates set forth in the following table at SN-04 through SN-15 combined. Compliance with this condition will be demonstrated by Specific Condition 43. [§18.801 and A.C.A.]

Pollutant	lb/hr	tpy
PM	0.8	3.2

41. The permittee shall comply with the following BACT determination at SN-04 through SN-15. Compliance with the emission levels set forth in the following table shall be demonstrated by compliance with Specific Condition 43. [§19.901and 40 CFR 52, Subpart E]

Pollutant	BACT Determination	
PM_{10}	drift eliminator (0.0005% drift efficiency)	0.8 lb/hr

42. The permittee shall not cause to be discharged to the atmosphere from SN-04 through SN-15 exhausts which exhibit greater than 20% opacity. Compliance with this opacity limit shall be demonstrated by compliance with Specific Condition 43. [§19.503 40 CFR 52 Subpart E]

43. The permittee shall not exceed in the circulated cooling water a total dissolved solids level of 1500 ppmw. [§18.1004, §19.705, 40 CFR 52, Subpart E, and A.C.A.]

44. The permittee shall perform monthly testing or other monitoring with written approval by the Department that demonstrates compliance with Specific Condition 43. The permittee shall submit the test or other records to the Department in accordance with General Provision 7. [§18.1004, §19.705, 40 CFR 52, Subpart E, and A.C.A.]

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 the following table of this condition. The permit specifically identifies the following as applicable requirements based upon the information submitted by the permittee in an application dated August 30, 2005.

Applicable Regulations

Source No.	Regulation	Description
facility	Arkansas Regulation 19	*Regulations of the Arkansas Plan of Implementation for Air Pollution Control*, Regulation 19, effective December 19, 2004
facility	Arkansas Regulation 26	*Regulations of the Arkansas Operating Air Permit Program*, Regulation 26, effective September 26, 2002
01 and 02	40 CFR Part 60, Subpart GG	*Standards of Performance for Stationary Gas Turbines*
01 and 02	40 CFR Part 60, Subpart Db	*Standards of Performance Industrial - Commercial - Institutional Steam Generating Units*
01 and 02	40 CFR Part 75	Federal Acid Rain Program - *Continuous Emission Monitoring*

The permit specifically identifies the following as inapplicable based upon information submitted by the permittee in an application dated August 8, 2005.

Inapplicable Regulations

Source No.	Regulation	Description
01 and 02	40 CFR Par 60, Subpart Da	*Standards of Performance for Electric Utility Steam Generating Units*
01 and 02	40 CFR Par 60, Subpart Dc	*Standards of performance for Small Industrial-Commercial-Institutional Steam Generating Units*
facility	40 CFR 60, Subpart Kb	*Standards of Performance for Volatile Organic Liquid Storage Tanks*
facility	40 CFR Part 63, Subpart YYYY	*NESHAP for Stationary Combustion Turbines*
facility	40 CFR Part 64	*Compliance Assurance Monitoring (CAM)*

Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

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 30, 2005.

Description	Category
Diesel tanks under 10,000 gallons	A-3
Emergency diesel fire-water pump	A-12
One Process Heater (natural gas & rated less than 10 MMBtu/hr)	A-1
Miscellaneous Oil Storage	A-13
Sodium Hydroxide Storage	A-4
Ammonia Storage	B-21
Sodium Hypochlorite Storage	B-44
Sulfuric Acid Storage	B-44
Other Boiler Feed Water Treatment Chemical Storage and System Operations	B-42, 43, & 44

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 September 26, 2002]

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

ADEQ CEMS Conditions

APPENDIX B

40 CFR 60, Subpart GG

APPENDIX C

40 CFR 60, Subpart Db

APPENDIX D

40 CFR Part 75