

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 1819-AOP-R13 AFIN: 16-00412

1. PERMITTING AUTHORITY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Jonesboro City Water and Light
1400 Hanley Drive
Jonesboro, Arkansas 72401

3. PERMIT WRITER:

Jesse Smith

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Fossil Fuel Electric Power Generation
NAICS Code: 221112

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
2/18/2020	Renewal	Updated emission factors SN-08 Removed to IA: SN-05A and SN-05B

6. REVIEWER'S NOTES:

Jonesboro City Water and Light (JCWL) owns and operates the Northwest Substation at 1400 Hanley Drive in Jonesboro, Arkansas. With this application, the method of calculation for NO_x emissions for SN-04, SN-06, and SN-07 has been updated to use the latest testing results rather than AP-42 emission factors. There were no permitted emission changes as a result of this modification.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

The facility was last inspected on June 16, 2023. There were no areas of concern noted at this time.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? N

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
SN-01, SN-02, SN-04, SN-06, and SN-07	SO ₂ CO NO _x	NSPS, Subpart GG
SN-04, SN-06, and SN07	SO ₂ NO _x CO ₂	40 CFR Parts 72, 73, and 75 (Acid Rain Provisions)
SN-08	HAPs	NESHAP Subpart ZZZZ
SN-01, SN-02, SN-04, SN-06, and SN-07	NO _x	40 CFR Part 64 (Compliance Assurance Monitoring)

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? Y

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? Y
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
SN-01, SN-02, SN-04, SN-06, SN-07	40 C.F.R. § 63 Subpart YYYY	The facility is not a major source of HAP emissions, and therefore not subject to NESHAP YYYY
SN-01, SN-02, SN-04, SN-06, SN-07	40 C.F.R. § 63 Subpart ZZZZ	These sources are engines installed after the date they would be subject to NESHAP ZZZZ and are subject to NSPS IIII
SN-01, SN-02, SN-04, SN-06, SN-07	40 C.F.R. § 60 Subpart KKKK	These sources were constructed prior to February 18, 2005, and therefore not subject to NESHAP KKKK
Facility	40 C.F.R. 52.21	This facility has not exceeded levels requiring PSD analysis.
SN-03	40 C.F.R. § 60 Subpart Kb	The tank stores a liquid with a true maximum vapor pressure of less than 3.5 kPa.
SN-01, SN-02, SN-04, SN-06, SN-07	40 C.F.R. § 60 Subpart JJJJ	These sources are not spark ignition engines and therefore not subject to NSPS JJJJ

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
SN-01, SN-02, SN-04, SN-06, SN-07	NO _x	Daily monitoring of water to fuel ratio

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the ADEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

The only changes to Non-Criteria pollutants in this permitting action were to an emergency generator not included in these modeling results, and so these results from the previous permit revision stand.

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Acenaphthene	0.2	0.022	2.2E-05	Yes
Acrolein	0.229	0.025	0.012	Yes
Anthracene	0.2	0.022	5.78E-06	Yes
Arsenic	0.010	0.001	0.015	No
Benzo(a)anthracene	0.2	0.022	2.92E-06	Yes
Benzo(a)pyrene	0.2	0.022	1.21E-06	Yes
Benzo(b)fluoranthene	0.2	0.022	5.21E-06	Yes

Pollutant	TLV (mg/m ³)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Benzo(g,h,i)perylene	0.2	0.022	2.61E-06	Yes
Benzo(k)fluoranthene	0.2	0.022	1.02E-06	Yes
Beryllium	0.00005	0.000006	0.0004	No
Cadmium	0.002	0.022	0.0064	No
Chromium	0.005	0.00055	0.015	No
Chrysene	0.2	0.022	7.19E-06	Yes
Fluoranthene	0.2	0.022	1.89E-05	Yes
Fluorene	0.2	0.022	6.01E-05	Yes
Indeno(1,2,3,c,d)pyrene	0.2	0.022	1.94E-06	Yes
Manganese	0.2	0.022	1.055	No
Mercury	0.01	0.001	0.002	No
Phenanthrene	0.2	0.022	1.92E-04	Yes
POM/PAH	0.2	0.022	0.0548	No
Pyrene	0.2	0.022	1.74E-5	Yes
Selenium	0.2	0.022	0.033	No

2nd Tier Screening (PAIL)

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

Pollutant	PAIL (µg/m ³) = 1/100 of Threshold Limit Value	Modeled Concentration (µg/m ³)	Pass?
Arsenic	0.1	0.00156	Y
Beryllium	0.0005	0.00002	Y
Cadmium	0.1	0.00061	Y
Chromium	0.05	0.00156	Y
Mercury	0.1	0.00012	Y

Pollutant	PAIL ($\mu\text{g}/\text{m}^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Pass?
Manganese	1	0.11172	Y
PAH/POM	2	0.00575	Y
Selenium	2	0.00354	Y

c) H₂S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H₂S Standards Y

If exempt, explain: There are no H₂S emissions

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
SN-01 SN-02 (oil)	Testing	PM ₁₀ – 10 VOC – 10 CO – 25 NO _x – 41	Water injection	Varies	Emission factors are controlled in units of lb/hr
SN-01 SN-02 (oil)	Maximum sulfur content	SO ₂ – 38	None	NA	Emission factors are controlled in units of lb/hr
SN-01 SN-02 (gas)	Testing	PM ₁₀ – 8 SO ₂ – 8 VOC – 10 CO – 25 NO _x – 38.9	Water injection	Varies	Emission factors are controlled in units of lb/hr
SN-04 SN-06 SN-07 (gas)	Testing	PM ₁₀ – 16 SO ₂ – 15 VOC – 20 CO – 25 NO _x – 56	Water injection	Varies	Emission factors are controlled in units of lb/hr
SN-04 SN-06 (oil)	Testing	PM ₁₀ – 20 VOC – 20 CO – 25 NO _x – 81	Water injection	Varies	Emission factors are controlled in units of lb/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
SN-04 SN-06 (oil)	Maximum sulfur content	SO ₂ – 75	None	NA	Emission factors are controlled in units of lb/hr
SN-03	Tanks 4.0	–	None	NA	Emission rate based on 1,128,000 gallons throughput
SN-01 SN-02 SN-04 SN-06 SN-07 (gas)	AP-42	All factors in lb/MMBtu	Water injection	-	Emission Factors controlled Table 3.1-3 Acetaldehyde – 4.0E-05 Acrolein – 6.4E-06 Benzene – 1.2E-05 1,3-Butadiene – 4.3E-07 Ethyl Benzene – 3.2E-05 Formaldehyde – 7.1E-04 Naphthalene – 1.3E-06 PAH– 2.2E-06 Propylene Oxide – 2.9E-05 Toluene – 1.3E-04 Xylenes – 6.4E-05
SN-01 SN-02 SN-04 SN-06 (oil)	AP-42	All factors in lb/MMBtu	Water injection	-	Emission Factors controlled Table 3.1-4 and 3.1-5 Benzene – 5.5E-05 1,3-Butadiene – 1.6E-05 Formaldehyde – 2.8E-04 Naphthalene – 3.5E-05 PAH – 4.0E-05 Arsenic – 1.1E-05 Beryllium – 3.1E-07

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					Cadmium – 4.8E-06 Chromium – 1.1E-05 Lead – 1.4E-05 Manganese – 7.9E-04 Mercury – 1.2E-06 Nickel – 4.6E-06 Selenium – 2.5E-05
08	AP-42 Table 3.4-1 for criteria pollutants; AP-42 Table 3.4-3, 3.4-4, 3.3-2 for HAPs	(lb/MMBtu) PM/PM ₁₀ —0.1 CO—0.85 NO _x —3.20 SO _x —0.05 VOC—0.09 Acrolein—7.88E-06 Benzene—3.07E-03 1,3-Butadiene—3.91E-05 Formaldehyde—7.89E-05 PAH—2.12E-04 Toluene—2.81E-04	None	N/A	759 hp; Limited to 500 hrs/yr. 7000 Btu/hp-hr

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01, 02, 04, 06, 07	SO ₂ NO _x CO	20 20 10	Every 5 years (initial testing completed)	Department Standard; one unit of each type with each type of fuel

17. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
The permittee is avoiding the requirement of installing a CEMS included in the Acid Rain Provisions by taking emission limits which allow SN-04, SN-06, and SN-07 to be classified as "Low Mass Emitters." And following the methodology in 40 CFR 75 § 75.19(c). A PEMS which monitors water injection rates is also to be used.				
01, 02, 04, 06, & 07	Water to Fuel Ratio & Gaseous and Oil Fuel Bound Nitrogen	A continuous monitoring system shall monitor and record the fuel consumption and the ratio of water or steam to fuel being fired in the turbine is to be used in lieu of a CEMS, as specified by NSPS GG and Specific Condition # 18.		N

18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01 02 04 06	Weight percent sulfur - diesel	0.05 %	Each shipment	N
01 02 04 06	Fuel Bound Nitrogen	<F, Fuel Bound Nitrogen from Specific Condition # 14	Each Shipment (Only required if permittee elects to take an emission allowance for Fuel Bound Nitrogen, i.e., an F-value other than zero)	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01 02 04 06 07	Water injected to fuel fired ratio necessary for compliance versus actual ratio	-	Daily	Only when deficient
01 02 04 06 07	Fuel consumption of each fuel for each turbine, and completion of the tpy pollutants per Specific Condition No. 3	Tpy limits in the permit	Monthly	Y
04 06 07	Annual emissions of NO _x and SO ₂	100 tons of NO _x 25 tons of SO ₂	Monthly	Y
04 06 07	Ozone season emissions of NO _x	50 tons	Monthly	Y
08	Hours of Operations	500 per rolling twelve months	Monthly	N
08	Maintenance Performed	N/A	As performed	N

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01, 02, 04, 06, & 07 (natural gas)	5%	[Regulation No. 18 §18.501 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311]	Fuel used
01, 02, 04, & 06 (fuel oil)	20%	[Regulation No. 19 §19.503 and 40 CFR 52, Subpart E]	Once per year observation
08	20%	[Regulation 19 §19.503 and 40 CFR Part 52, Subpart E]	Inspector Observation

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20. DELETED CONDITIONS:

Former SC	Justification for removal
#73 - #75	Sources removed, moved to insignificant activity list

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Diesel Storage Tank, 425 gal	A-3			6.5E-05				
NaOH Tank, 7,000 gal	A-4							
Sulfuric Acid Tank, 7,000 gal	A-13						0.01	0.01
Waste Acid Tank, 55 gal	A-13							
Two Cooling Towers	A-13	0.30						

22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
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APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Jonesboro City Water and Light
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\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	670.3
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500

Check if Facility Holds an Active Minor Source or Minor Source General Permit ☐

If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$ 0

Total Permit Fee Chargeable Emissions (tpy) 0

Initial Title V Permit Fee Chargeable Emissions (tpy)

HAPs not included in VOC or PM:

Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants:

All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensible PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		91.3	91.3	0		
PM ₁₀		91.3	91.3	0	0	91.3
PM _{2.5}		0	0	0		
SO ₂		221.6	221.6	0	0	221.6
VOC		114.1	114.1	0	0	114.1
CO		154.8	154.8	0		
NO _x		243.3	243.3	0	0	243.3
Lead	<input type="checkbox"/>	0.0819	0.0819	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Total HAPs	<input type="checkbox"/>	13.72	13.72	0		