Clark Public Utilities

River Road Generating Plant

Air Operating Permit Basis Statement

Southwest Clean Air Agency
11815 NE 99 Street, Suite 1294
Vancouver, WA 98682-2454
(360) 574-3058

PERMIT #: SW99-9-R1

ISSUED TO: Clark Public Utilities
P.O. Box 8900
Vancouver, WA 98668

PLANT SITE: River Road Generating Plant
5201 NW Lower River Road
Vancouver, WA 98660

PERMIT ENGINEER:_____ _____
Wess Safford, Air Quality Engineer Date

REVIEWED BY: _____ _____
Paul T. Mairose, Chief Engineer Date

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I. GENERAL INFORMATION AND CERTIFICATION

1. Company Name: Clark Public Utilities

2. Facility Name: River Road Generating Plant

3. Parent Company: Clark Public Utilities

4. Responsible Official: Jack R. Anderson, Energy Resources Manager (Clark PUD)

5. Facility Contact Person: Jack R. Anderson, Energy Resources Manager (Clark PUD)

6. Unified Business Identification Number: 065002678

7. Standard Industrial Classification Code (SIC): 4911

8. North American Industry Classification System (NAICS): 221112

9. Facility Description:

Public Utilities District #1 of Clark County (Clark PUD) owns the River Road Generating Plant, a natural gas-fired combustion turbine combined-cycle (CTCC) power facility. The River Road Generating Plant generates electricity to supply to Clark Public Utilities. The nominal generating capacity of the facility is 248 megawatts (MW). The River Road Generating Plant is currently operated for Clark PUD by a third party. The facility has 5 emission units: combustion turbine, startup boiler, gas heater, backup generator and fire pump.

10. Basis for Title V Applicability:

The River Road Generating Plant is not a major source as defined in WAC 173-401-200(19). The facility is subject to the Title V Air Operating Permit program because it is an affected source under the Title IV Acid Rain program.

11. Attainment Area:

The River Road Generating Plant is located within the Portland-Vancouver ozone and CO maintenance area. The area was redesignated for carbon monoxide in October 1996 and for ozone in April 1997. The area is in attainment for all other pollutants. When the River Road Generating Plant was originally constructed and "permitted" by SWCAA (1995), the area was nonattainment for carbon monoxide (CO) and ozone. This caused the facility to be subject to offsetting requirements if facilitywide emissions were greater than 100 tons/year; hence the permittee opted to take a 99.0 tons/year nitrogen oxides (NO_x) limit to avoid this requirement.

II. EMISSION UNIT DESCRIPTIONS

EU-1 Combustion Turbine

One General Electric model 7A1PFA28-1 natural gas fired combustion turbine (serial #296845) configured with an unfired heat recovery steam generator (HRSG). Exhaust gases from the combustion turbine/HRSG are discharged to the atmosphere through an 18 foot diameter, 198 foot tall stack. The combustion turbine has an annular can-type combustor

employing 14 small diameter, high mixing, dry low-NO_X combustors to minimize NO_X formation. The combustion turbine is equipped with an inlet air fogger system that helps to maintain turbine output during periods of warm ambient temperature. Although originally approved to fire on both natural gas and low sulfur distillate oil, the capacity to fire distillate oil was never installed. Emissions from the combustion turbine consist of NO_x, CO, SO_2, PM, VOC, NH_3, and TAPs.

EU-2 Startup Boiler

One Nebraska Boiler model NS-E-76SH (serial number D-3570) natural gas fired boiler with a rated steam generating capacity of 70,000 pounds per hour. The startup boiler is equipped with a Coen BMS-2000 burner management system and Coen Quantum low NO_X burners. The Coen burners have a rated heat input of 103.5 million British thermal units per hour (MMBtu/hr). Exhaust gases from the startup boiler are discharged to the atmosphere through a 4 foot diameter, 83 foot tall stack. Although originally approved to fire on both natural gas and low sulfur distillate oil, the capacity to fire distillate oil was never installed. Emissions from the startup boiler consist of NO_x, CO, SO_2, PM, VOC, and TAPs.

EU-3 Gas Heater

One natural gas fired gas heater manufactured in 1997 by GasTech Engineering Corporation (serial #D-2055). The gas heater is equipped with low-NO_X burners with a maximum heat input of 2.5 MMBtu/hr. Emissions from the gas heater consist of NO_x, CO, SO_2, PM, VOC, and TAPs.

EU-4 Emergency Generator

One emergency electric generator powered by a Detroit Diesel/Allison diesel engine (serial #378162) rated at 568 brake horsepower. Emissions from the diesel-fired emergency generator consist of NO_x, CO, SO_2, PM, VOC, and TAPs.

EU-5 Emergency Fire Pump

One fire pump powered by a Detroit Diesel (Perkins) model PDFD-L6YT2504 diesel engine (serial #U630355B) rated at 110 brake horsepower. Emissions from the diesel-fired emergency fire pump consist of NO_x, CO, SO_2, PM, VOC, and TAPs.

III. EXPLANATION OF INSIGNIFICANT EMISSION UNIT DETERMINATIONS

Each emission unit listed as insignificant in the permit has been reviewed by SWCAA to confirm its status. The emission units were determined to be insignificant as follows:

IEU-1 Combustion Turbine Lube Oil Tank Vent

Lubricating oil for the main turbine is stored in a single lube oil tank. Lubricating oil storage tanks are categorically exempt under WAC 173-401-532(3).

IEU-2 Cooling Towers

Primary cooling of the water used to condense process steam takes place at the cooling towers. They are categorically exempt insignificant emissions units under WAC 173-401-532(121) because of processing exclusively non-contact cooling water.

IEU-3 Blast Cabinet

A single blast cabinet is installed in one of the maintenance shops at the facility. The cabinet is used to surface prep (sand blast) small items in the course of general maintenance operations. The blast cabinet is exhausted to a dedicated abrasive separator/cartridge collector. Emissions from the blast cabinet are considered insignificant due to its small size, limited use, and lack of direct ambient discharge.

IV. EXPLANATION OF APPLICABLE REQUIREMENTS

Requirements 1-8 [WAC 173-400-040]
General Standards for Maximum Emissions [SWCAA 400-040]

WAC 173-400-040 and SWCAA 400-040 establish maximum emission standards for various air contaminants. These standards apply to all emission units at the source, both EU and IEU. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for affected IEUs except those specifically identified by the underlying requirements.

Requirement 9 [WAC 173-400-050]
Emission Standards for Combustion and Incineration Units [SWCAA 400-050]

WAC 173-400-050 and SWCAA 400-050 establish maximum emission standards for selected emissions from combustion and incineration units. These requirements apply to all combustion and incineration units at the source, both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for affected IEUs except those specifically identified by the underlying requirements.

Requirement 10 [WAC 173-400-060]
Emission Standards for General Process Units [SWCAA 400-060]

WAC 173-400-060 and SWCAA 400-060 establish maximum particulate matter emission standards for general process units. These requirements apply to all general process units at the source, both EUs and IEUs. For this facility, this standard only applies to IEUs because all of the EUs are combustion units which are not subject. However, pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for affected IEUs except those specifically identified by the underlying requirements. Therefore, the standard has been referenced as applicable, but no specific monitoring or recordkeeping has been developed.

Requirement 11 [SWCAA 400-070(8)]
Emission Standards for Abrasive Blasting

SWCAA 400-070(8) establishes general limitations and work practice requirements for abrasive blasting operations. These requirements apply to any abrasive blasting operation at the source, both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for affected IEUs except those specifically identified by the underlying requirements.

Requirements 12-17, 20-27, 29, 31-44 [ADP 95-1800R5]
SWCAA Air Discharge Permit

ADP 95-1800R5 establishes emission limits and operational requirements for all of the EUs at the facility. This permit superseded ADP SWCAA 95-1800R4 as described in the obsolete

regulation section of this basis statement. When the River Road Generating Plant was constructed, the Vancouver area under SWCAA jurisdiction was nonattainment for ozone. New facilities with emissions greater than 100 tons/year of NO_X or VOC were subject to offsetting and LAER requirements under SWCAA regulations. In order to avoid offsetting requirements, a 99.0 tons/year NO_x facility wide emission limit was opted to be established for the River Road Generating Plant. At the time of approval, the NO_X emission controls installed on the gas turbine were considered BACT but may also have been considered LAER.

Requirement 18 [40 CFR 60.11(d)]

Compliance with Standards and Maintenance Requirements

40 CFR 60.11(d) requires the permittee to maintain and operate EU-1 and EU-2 consistent with good air pollution control practices to minimize emissions. 40 CFR 60.11(d) applies specifically to emission units EU-1 and EU-2 because they are the only units subject to a New Source Performance Standard in 40 CFR Part 60.

Requirement 19 [40 CFR 60.12]

Circumvention

40 CFR 60.12 requires the permittee to not do or use anything that would conceal a violation of a standard. 40 CFR 60.12 applies specifically to emission units EU-1 and EU-2 because they are the only units subject to a New Source Performance Standard in 40 CFR Part 60.

Requirements 20, 37 [40 CFR 60, Subpart Db]

New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units

40 CFR 60, Subpart Db establishes SO_2, NO_X, particulate matter and opacity standards for industrial-commercial-institutional steam generating units with heat input capacities greater than 100 MMBtu/hr. This unit is an affected facility because the startup boiler is a steam generating unit rated at 103 MMBtu/hr and was installed after June 19, 1984. Subpart Db requires affected facilities to meet a NO_X standard as described in 40 CFR 60.44b. However, the start boiler combusts only natural gas and has a federally enforceable permit requirement limiting annual capacity factor to 10 percent or less so the NO_X standard does not apply pursuant to 40 CFR 60.44b(k). There are no SO_2, PM, or opacity standards applicable to the startup boiler under 40 CFR Subpart Db.

Requirements 21, 28

New Source Performance Standards for Stationary Turbines [40 CFR 60, Subpart GG]

40 CFR 60, Subpart GG establishes NO_x and SO_2 emission standards for selected stationary turbines. EU-1 is an affected facility because the unit is an electric utility stationary gas turbine with a heat input at peak load greater than 10.7 gigajoules per hour and was installed after October 3, 1977. Consequently, the unit is subject to NO_X and SO_2 emission standards. The applicable NO_x standard is 107 ppmvd @ 15% O_2 based on the equation in 40 CFR 60.332(a)(1), a Y factor of 10.1 and an F factor of 0. Pursuant to 40 CFR 60.333, affected facilities have the option to comply with the SO_2 standard by means of an SO_2 emission limit or a fuel sulfur content limit. The permittee has opted to comply with the fuel sulfur content limit specified in 40 CFR 60.333(b). There are no PM or opacity standards applicable under 40 CFR Subpart GG.

Requirement 30 [40 CFR 72.9(c)]
Acid Rain Compliance Plan [40 CFR 72.40(a)]
[WAC 173-406-106(3)]

The River Road Generating Plant is an "affected source" under the Acid Rain Program. 40 CFR 72.40 and WAC 173-406-400 require that the facility hold SO_2 allowances not less than the total annual emissions in tons of SO_2 from EU-1 beginning with calendar year 2000.

V. EXPLANATION OF OBSOLETE AND FUTURE REQUIREMENTS

1. 40 CFR 60.7 "Notification and Record Keeping"

The startup boiler and combustion turbine are subject to New Source Performance Standards (Subparts Db and GG respectively). Therefore, these units are also subject to the notification requirements of 40 CFR, Section 60.7. These requirements have been met as described below.

Combustion Turbine

Notification of construction:	Submitted to SWCAA via letter dated February 4, 1997
Notification of anticipated startup:	Submitted to SWCAA via letter dated May 12, 1997
Notification of actual startup:	Submitted to SWCAA via letter dated August 12, 1997

Startup Boiler

Notification of construction:	Submitted to SWCAA via letter dated February 4, 1997
Notification of anticipated startup:	Submitted to SWCAA via letter dated May 12, 1997
Notification of actual startup:	Submitted to SWCAA via letter dated July 14, 1997

2. 40 CFR 60.8 "Performance Tests"

The combustion turbine is subject to the NO_x standard described in 40 CFR 60.332. Therefore the unit is also subject to the performance testing requirements of 40 CFR, Section 60.8. These requirements have been met as described below.

Notification of source test date:	Submitted to SWCAA on June 23, 1997
Notification of test date change:	Submitted to SWCAA on September 4, 1997
Initial source test:	Performed on September 11-12 and October 23, 1997
Source test report:	Submitted to SWCAA on November 20, 1997

3. 40 CFR 75.61 "Notifications"

The combustion turbine is subject to the requirements of 40 CFR Part 75.61 "Notifications". These requirements have been met as described below.

Notification of actual startup date:	Submitted to SWCAA on August 12, 1997
Notification of initial CEMS certification:	Submitted to SWCAA on June 23, 1997
Notification of test date changes:	Submitted to SWCAA on August 22, 1997 and September 4, 1997
Initial CEMS certification test:	Completed on September 11, 1997

4. 40 CFR 75.62 "Monitoring Plan"

The combustion turbine is subject to the requirements of 40 CFR, Section 75.62 "Monitoring Plan". The initial monitoring plan required by 40 CFR 75.62 was submitted to SWCAA and EPA on June 6, 1997.

5. 40 CFR 75.63 "Initial Certification or Recertification Application"

The combustion turbine is subject to the requirements of 40 CFR, Section 75.63. The results of the initial CEM certification tests were submitted to EPA on December 11, 1997.

6. SWCAA Air Discharge Permits

Air Discharge Permit (ADP) 95-1800 dated October 25, 1995 approved the original construction of the facility. This permit was superseded in its entirety by ADP 95-1800R1.

ADP 95-1800R1 dated April 7, 1997 approved the addition of the natural gas indirect fired water bath heater, EU-3. At the time of the original application submittal for the Plant, the gas heater was specified as an electric heater and was later found that a natural gas fired heater was more cost-effective. All previous emission limits and operational conditions from ADP 95-1800 were carried forward in this new permit. This permit was superseded in its entirety by ADP 95-1800R2.

ADP 95-1800R2 dated August 21, 1997 approved modifications to operational limitations on the startup boiler and emission testing requirements of the turbine. All previous emission limits and unmodified operational conditions were carried forward in this new permit. This permit was superseded in its entirety by ADP 95-1800R3.

ADP 95-1800R3 dated January 19, 1998 approved modifications of startup boiler and in-line heater emission limits. All previous emission limits and unmodified operational conditions were carried forward in this new permit. This permit was superseded in its entirety by ADP 95-1800R4.

ADP 95-1800R4 dated September 16, 1998 established limits to the amount of ammonia that can be stored in the ammonia storage tank to remain exempt of the requirements of 40 CFR 68 for Chemical Accident Prevention. All previous emission limits and operational conditions were carried forward in this new permit. This permit was superseded in its entirety by ADP 95-1800R5.

VI. EXPLANATION OF MONITORING

M1. Visible Emissions Monitoring (Reqs 1, 27, 36, 42)

The applicable requirements cited in this monitoring section are general requirements drawn from WAC 173-400, SWCAA 400 and ADP 95-1800R5. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring requirements under the "gap filling" provisions of WAC 173-401-615. The monthly inspections specified by this requirement are intended to identify potential visible emission violations in a timely fashion and prompt corrective action as necessary.

A monthly inspection frequency is considered adequate to assure compliance with applicable opacity requirements based on this source's history of continued compliance and the fact that

operation of the primary emission units at this facility (combustion turbine, startup boiler, gas heater) is not likely to cause visible emissions.

M2. General Particulate Matter Monitoring (Reqs 2-3, 8-11)

The applicable requirements cited in this monitoring section are general requirements drawn from WAC 173-400 and SWCAA 400. These requirements do not directly establish a specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring requirements under the "gap filling" provisions of WAC 173-401-615. These monitoring requirements are designed to assure compliance through periodic facility inspections and prompt corrective action. The facility does not normally generate fugitive emissions and none of the emission units has a history of excess emissions. Consequently, monthly facility inspections have been identified as an adequate means of assuring compliance. For outdoor abrasive blasting in specific, inspection frequency is increased to daily due to the greater potential for significant emissions if reasonable precautions are not taken and maintained.

In regards to applicable requirements 9 and 10, natural gas combustion sources typically do not emit significant quantities of particulate matter as substantiated by numerous emission tests and EPA emission factors. The following equation shows an example calculation of particulate matter concentrations from natural gas combustion based on the EPA AP-42 Section 1.4 (3/98) emission factor for particulate matter and the exhaust rate for natural gas of 8710 dscf/million Btu from 40 CFR 60, Appendix A Table 19-1 (corrected to 7% O_2):

(0.0076 lb /MMBtu)*(7000 gr/lb)*(MMBtu/8710 dscf)*(20.9-7.0)/(20.9) =
0.0041 gr/dscf @ 7% O_2)

Based on the above analysis, it is highly unlikely that the combustion sources in question could exceed the limit of 0.1 gr/dscf particulate matter while firing on natural gas. Therefore certification of fuel type, as required in 40 CFR 60.334(b)(2) and 40 CFR 75.11(d)(2) for EU-1, is adequate to assure compliance with these requirements.

M3. Complaint Monitoring (Reqs 2, 4-5)

The applicable requirements cited in this monitoring section are general requirements drawn from WAC 173-400 and SWCAA 400. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring requirements under the "gap filling" provisions of WAC 173-401-615. This monitoring scheme applies to applicable requirements that prohibit unacceptable impacts on neighbors and/or surrounding populations. This facility does not have a history of complaints, nuisance odors, or offsite fall-out emissions. While some of the prohibited impacts could be observed from the facility itself, compliance with all provisions can not be assured by onsite observations alone (e.g., offsite odor impact). Therefore, this monitoring scheme relies on input from affected parties and prompt complaint response.

M4. Combustion Turbine SO_2 Monitoring (Reqs 23, 28, 30)

The applicable requirements cited in this monitoring section are drawn from 40 CFR 60.334(b)(2), 40 CFR 72, 40 CFR 75.11(d)(2), WAC 173-406-106, and ADP 95-1800R5. Fuel sulfur content monitoring forms the basis of the SO_2 monitoring scheme for the combustion turbine. SO_2 emissions are quantified by calculating hourly emissions based on recorded heat input and emission factors drawn from fuel sulfur monitoring data. Pursuant to 40 CFR

60.334(b)(2), the permittee has received approval from EPA Region X for an alternate fuel monitoring schedule as described in a letter dated July 11, 1995. The alternate monitoring schedule specifies a quarterly/semiannual monitoring frequency for fuel sulfur content. Concurrent with the alternate monitoring schedule, the permittee has also opted to comply with the provisions of 40 CFR 75.11(d) by using the procedures in 40 CFR 75, Appendix D.

M5. Combustion Turbine NO_x Monitoring (Req 21)

This monitoring section assures compliance with NO_x emission limits from ADP 95-1800R5, Requirement 3 and fulfills the monitoring requirements of 40 CFR 75 and 40 CFR 60.334(b)(2) through the installation and maintenance of a NO_x CEMS/DAHS. NO_x emissions are quantified by calculating hourly emissions based on recorded heat input and CEMS data expressed in units of lb/MMBtu. The emission calculations are consistent with the methodology required for NO_x calculations by 40 CFR 75.12 (40 CFR 75, Appendix F). Since there is no significant fuel-bound nitrogen in pipeline quality natural gas, EPA has provided a waiver from the daily fuel nitrogen content requirement in 40 CFR 60.334(b)(2) via a letter dated July 11, 1995.

M6. Combustion Turbine CO Monitoring (Req 22)

This monitoring section assures compliance with the CO emission limits from ADP 95-1800R5, Requirement 3 through the installation and maintenance of a CO CEMS/DAHS. CO emissions are quantified by calculating hourly emissions based on recorded heat input and CEMS data expressed in units of lb/MMBtu. The emission calculations are consistent with the methodology in Equation 19-1 of 40 CFR 60, Appendix A. The CEMS is maintained in accordance with the specifications of 40 CFR 60, Appendices B and F.

M7. Combustion Turbine Operations Monitoring (Reqs 24-26)

This monitoring section collects operational data as required by 40 CFR 75.10 and ADP 95-1800R5, Requirements 22 and 25. The section is also intended to assure compliance with PM, VOC, and NH_3 emission limits from ADP 95-1800R5, Requirement 3. PM, VOC, and NH_3 emissions are quantified by calculating hourly emissions based on recorded heat input and applicable emission test data expressed in units of lb/MMBtu.

M8. Combustion Turbine Emission Testing (Reqs 6, 9, 21-28)

This monitoring section is drawn from SWCAA 95-1800R5, Appendix A. The initial emission test for the combustion turbine included testing for NO_x, CO, SO_2, PM, VOC, and NH_3. Since the VOC and PM emission profiles of this unit are not likely to significantly change with time, periodic emission testing for these pollutants is not required. Data from initial and periodic emission testing is used to generate emission factors for VOC, PM, and NH_3. The prescribed test loads required for emission testing were revised under ADP 95-1800R5. The new test conditions require testing at greater than 95% load rather than a range of four different loads.

M9. Startup Boiler Operations Monitoring (Reqs 31-35, 37)

This monitoring section is drawn from 40 CFR 60.49b and SWCAA 95-1800R5. In order to assure compliance with the provisions of 40 CFR 60.49b, startup boiler heat input is monitored and recorded on a daily basis. The unit's annual capacity factor is calculated for each calendar quarter on a 12-month rolling basis. Recorded heat input is used with tested emission factors to quantify emissions and demonstrate compliance with applicable emission limits.

M10. Startup Boiler Emissions Testing (Reqs 6, 9, 31-36)

This monitoring section is drawn from SWCAA 95-1800R5, Appendix C. The initial emission test for the startup boiler included testing for NO_x, CO, PM, and VOC. Since the VOC and PM emission profiles of this unit are not likely to significantly change with time, periodic emission testing for these pollutants is not required. Data from initial and periodic emission testing is used to generate emission factors for NO_x, CO, PM, and VOC.

M11. Gas Heater Operations Monitoring (Reqs 38-41)

This monitoring section is drawn from SWCAA 95-1800R5, Requirement 27. Emission testing is not required for the gas heater because it is a small unit (i.e., potential emissions are less than 3.0 tons/year combined). Compliance with applicable emission limits is demonstrated based on recorded fuel consumption and emission factors as cited in the Technical Support Document for ADP 95-1800R5.

M12. Emergency Generator/Fire Pump Operations Monitoring (Reqs 43-44)

The emergency generator and the diesel fire pump are not required to be tested since their use is limited to emergency use only and the resulting emissions are very small. If these units were not previously incorporated into the facility's Air Discharge Permit, the units would be considered insignificant emission units under WAC 173-401. Compliance with applicable emission limits (incorporated into Plantwide limits) is demonstrated based on recorded hours of operation and emission factors from the manufacturer and EPA, AP-42.

M13. Ammonia Storage (Req 29)

The permittee has opted to avoid the Risk Management Plan requirements of 40 CFR 68 by limiting actual onsite ammonia storage to less than the applicable threshold of 20,000 lbs. Since 40 CFR Part 68 does not require any specific monitoring to substantiate compliance with the exemption threshold, SWCAA has implemented monitoring requirements under the "gap filling" provisions of WAC 173-401-615 to assure compliance with the exemption threshold. Tank levels are observed before and after each material delivery. Periodic monitoring of the ammonia storage tank provides an accurate indication of the amount of stored ammonia because the permittee has documented the relationship between material level in the tank and the corresponding weight of stored ammonia. This monitoring and recordkeeping is not required at the point where maximum onsite ammonia storage capacity has been physically reduced to less than 19,500 pounds.

M14. Plantwide Emission Calculations (Reqs 12-17)

This monitoring section is drawn from ADP 95-1800R5, Requirement 36. The permittee is required to calculate plantwide emissions on a 12-month rolling basis using emissions data gathered under monitoring requirements M4-M7, M9, M11-12. Compliance with applicable plantwide emission limits is then demonstrated by each monthly emission summary.

VII. EXPLANATION OF RECORDKEEPING REQUIREMENTS

K1. General Recordkeeping

This recordkeeping section is taken from WAC 173-401-615(2). Sections (a) through (c) were added to clarify specific requirements.

K2. Continuous Emission Monitoring Data

This recordkeeping section is taken from 40 CFR 75, Sections 53 and 56. The Acid Rain Program requires that pertinent records be maintained for at least three years from the date of the record. However, the recordkeeping provisions of the Air Operating Permit regulations, WAC 173-401-615(2)(c), require retention of records for a period of five years. The type and format of data to be recorded is specified for operating conditions and emissions of Acid Rain affected units.

K3. New Source Performance Standard Recordkeeping

This recordkeeping section is taken from 40 CFR 60.7(b). New Source Performance Standards require that records of startups, shutdowns, and malfunctions be maintained for all affected units. For this permit, this recordkeeping applies to the combustion turbine and startup boiler. 40 CFR 60.7(b) requires records to be maintained for a minimum of three years. However, the recordkeeping provisions of the Air Operating Permit regulations, WAC 173-401-615(2)(c), require retention of records for a period of five years.

VIII. EXPLANATION OF REPORTING REQUIREMENTS

R1. Excess Emission and Deviation Reports

The permittee is required to report all permit deviations, excess emissions, and detrimental emissions pursuant to WAC 173-401-615(3), SWCAA 400-107, and ADP 95-1800R5. Permit deviations due to excess emissions shall be reported to SWCAA as soon as possible. Consistent with those regulations, SWCAA may request a full report of any deviation if determined to be necessary, and each deviation must be explained in the subsequent quarterly report.

R2. Complaint Reports

The permittee is required to report all complaints to SWCAA within three business days of receipt. This reporting section is based on WAC 173-401-615(3), and SWCAA's definition of "prompt" for reporting of complaints.

R3. Quarterly Reports

The permittee is required to report monitoring records and certification of monitoring records on a quarterly basis by the Acid Rain Program as well as ADP 95-1800R5. Although semi-annual reporting of monitoring records and certification of monitoring records is required by WAC 173-401-615(3), quarterly reporting of specified monitoring records is required under 40 CFR 75.64, with compliance certification according to 40 CFR 75.64(c). The data to be reported, and the format by which it is to be reported, are specified as "General" requirements and "Acid Rain" requirements. General reporting requirements are derived from WAC 173-401-615(3) and ADP 95-1800R5, Requirement 36. Acid Rain reporting requirements are based on 40 CFR 75.64.

R4. Semi-Annual Reports

The permittee is required to provide a report on the status of all monitoring records and certify all reports on a semi-annual basis. Semi-annual reporting and certification of monitoring records is required by WAC 173-401-615(3). A Responsible Official must certify all reports required by the Title V permit. This report provides information on the status of all required monitoring. The actual results (e.g. measured pressure drops, opacity readings, etc.) do not need to be submitted unless specifically required by the permit.

R5. Annual Compliance Certification

The permittee is required to report and certify compliance with all permit terms and conditions on an annual basis. Annual compliance certification is required by SWCAA 401-630(5) and also by 40 CFR 72.90 for EU-1. 40 CFR 60.11(g) requires the permittee to consider credible evidence when submitting compliance certifications to NSPS affected units (EU-1 and EU-2). All deviations from permit conditions or certifications of intermittent compliance need to be accompanied by an explanation.

In the annual compliance certification for each Acid Rain affected unit, the permittee or designated representative must indicate whether the unit held allowances in its compliance subaccount not less than the unit's total SO_2 emissions during the calendar year covered by the annual report. The permittee is required to indicate in the certification whether the monitoring plan is current, the monitors are properly certified, and all emissions were accounted for by monitoring or missing data procedures.

R6. Emission Inventory Reports

The permittee is required to report an inventory of emissions from the source on an annual basis. A complete emissions inventory includes quantifiable emissions from all EUs and IEUs at the facility. This reporting requirement is drawn from WAC 173-400-105 and SWCAA 400-105. The two regulations specify different submittals dates (April 15 and March 15, respectively) so the requirements have been combined to require inventory submittal by the earlier date of March 15.

R7. Emission Test Reports

As specified in ADP 95-1800R5, the permittee is required to report all emission testing results and associated operational data to SWCAA within 45 days of test completion. This reporting schedule allows timely review by SWCAA.

R8. General Acid Rain Reports

These reporting requirements are taken from 40 CFR 75, Sections 60, 61 and 63. General Acid Rain reporting requirements are identified in 40 CFR 75.60(b). The reports identified in 40 CFR 75, Sections 61 and 63 concern notification and application for CEMS certification and recertification for affected units.

IX. APPENDICES

1. Appendix A – Combustion Turbine Alternative Fuel Monitoring Schedule

Appendix A contains the EPA Region 10 letter dated July 11, 1995 that approved the alternate fuel monitoring schedule for the combustion turbine cited in the explanation of M5 and M6.

2. Appendix B – Ammonia Test Procedure (BAAQMD ST-1B)

Appendix B contains the Bay Area ST-1B source test method cited in M9 for determining ammonia emissions from the combustion turbine.

3. Appendix C – Acid Rain Permit

Appendix C contains the most recent Acid Rain Application and Permit for the River Road

Generating Plant. The facility's current Acid Rain Permit (number SW-ARP-2-R0) expires concurrent with the current Air Operating Permit on May 12, 2004. The renewal permit (number SW-ARP-2-R1) will be issued concurrent with this Air Operating Permit, and will be effective through the expiration date of this Air Operating Permit.

X. PERMIT ACTIONS

1. Permit Renewal – SW99-9-R1

Application received:	October 30, 2003
Application complete:	December 30, 2003
Application sent to EPA:	January 2, 2004
Draft permit issued:	April 30, 2004
Proposed permit issued:	June 16, 2004
Final permit issued:	August 11, 2004

2. Previous Permitting Actions

SW99-9-R0

Application complete:	June 12, 1998
Final permit issued:	May 12, 1999
Administrative change:	June 1, 1999