June 13, 2011

David Hooper, Senior Environmental Scientist
Puget Sound Energy – Mint Farm Generating Station
1200 Prudential Boulevard
Longview, WA 98632

Re: Final Air Operating Permit for the Mint Farm Generating Station

Dear Mr. Hooper:

The Southwest Clean Air Agency (SWCAA) is issuing a final Air Operating Permit to Puget Sound Energy for the Mint Farm Generating Station. This is an initial permit.

A copy of the final Air Operating Permit and associated Basis Statement accompany this letter. In addition, copies of the final permit will be available on SWCAA's website at www.swcleanair.org. If you have any questions or comments, please contact me at (360) 574-3058 ext. 126.

Sincerely,

[Signature]

Wess Safford
Air Quality Engineer

Enclosures
Puget Sound Energy
Mint Farm Generating Station

Air Operating Permit
SW08-15-R0

Issued: June 13, 2011

Southwest Clean Air Agency
11815 NE 99 Street, Suite 1294
Vancouver, WA 98682-2322
Telephone: (360) 574-3058
AIR OPERATING PERMIT #: SW08-15-R0

ISSUED TO: Puget Sound Energy
           10885 NE Fourth St
           Bellevue, WA 98004

PLANT SITE: Mint Farm Generating Station
           1200 Prudential Boulevard
           Longview, WA 98632

NATURE OF BUSINESS: Electric Energy Generation

SIC / NAICS CODE: 4911 / 221112

AIRS NUMBER: 53-015-00068

ACID RAIN PROGRAM IDENTIFICATION
   PLANT NAME: Mint Farm Generating Station
   ORIS CODE: 55700
   UNIT DESIGNATIONS CTG1

EFFECTIVE DATE: June 13, 2011

EXPIRATION DATE: June 13, 2016

RENEWAL APPLICATION DUE: June 13, 2015

PERMIT ENGINEER:

Wess Safford, Air Quality Engineer

Date

REVIEWED BY:

Paul T. Mairose, Chief Engineer

Date

APPROVED BY:

Robert D. Elliott, Executive Director

Date

Permit No. SW08-15-R0

June 13, 2011
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I. ABBREVIATIONS

List of Common Abbreviations

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>ADP</td>
<td>Air Discharge Permit</td>
</tr>
<tr>
<td>AOP</td>
<td>Air Operating Permit</td>
</tr>
<tr>
<td>CEM</td>
<td>Continuous Emission Monitor</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CO</td>
<td>Carbon monoxide</td>
</tr>
<tr>
<td>EPA</td>
<td>U.S. Environmental Protection Agency</td>
</tr>
<tr>
<td>EU</td>
<td>Emission unit</td>
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<tr>
<td>EU#</td>
<td>Refers to a specific emission unit numbered &quot;#&quot;</td>
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<tr>
<td>FCCA</td>
<td>Federal Clean Air Act</td>
</tr>
<tr>
<td>G#</td>
<td>Refers to a specific general term or condition numbered &quot;#&quot;</td>
</tr>
<tr>
<td>gr/dscf</td>
<td>Grains per dry standard cubic foot</td>
</tr>
<tr>
<td>HAP</td>
<td>Hazardous air pollutant</td>
</tr>
<tr>
<td>IEU</td>
<td>Insignificant emission unit</td>
</tr>
<tr>
<td>IEU#</td>
<td>Refers to an insignificant emission unit numbered &quot;#&quot;</td>
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<tr>
<td>K#</td>
<td>Refers to a specific recordkeeping term or condition numbered &quot;#&quot;</td>
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<tr>
<td>M#</td>
<td>Refers to a specific monitoring term or condition numbered &quot;#&quot;</td>
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<tr>
<td>MMBtu</td>
<td>Million British thermal units</td>
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<tr>
<td>MSDS</td>
<td>Material safety data sheet</td>
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<tr>
<td>MW</td>
<td>Megawatts</td>
</tr>
<tr>
<td>N#</td>
<td>Refers to a specific nonapplicable requirement numbered &quot;#&quot;</td>
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<tr>
<td>NH₃</td>
<td>Ammonia</td>
</tr>
<tr>
<td>NOₓ</td>
<td>Oxides of nitrogen</td>
</tr>
<tr>
<td>NSR</td>
<td>New Source Review</td>
</tr>
<tr>
<td>O₂</td>
<td>Oxygen</td>
</tr>
<tr>
<td>P#</td>
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<tr>
<td>PM</td>
<td>Particulate matter</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Particulate matter less than 10 microns in diameter</td>
</tr>
<tr>
<td>PM₂₅</td>
<td>Particulate matter less than 2.5 microns in diameter</td>
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<tr>
<td>ppmvmd</td>
<td>Parts per million by volume, dry</td>
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<tr>
<td>PTE</td>
<td>Potential to emit</td>
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<td>R#</td>
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<td>RACT</td>
<td>Reasonably available control technology</td>
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<td>RCW</td>
<td>Revised Code of Washington</td>
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<td>Req#</td>
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<td>SO₂</td>
<td>Sulfur dioxide</td>
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<tr>
<td>SIP</td>
<td>State implementation plan</td>
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<tr>
<td>SWCAA</td>
<td>Southwest Clean Air Agency</td>
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<tr>
<td>TAP</td>
<td>Toxic air pollutant</td>
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<tr>
<td>tpy</td>
<td>Tons per year</td>
</tr>
<tr>
<td>VOC</td>
<td>Volatile organic compound</td>
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<tr>
<td>WAC</td>
<td>Washington Administrative Code</td>
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Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.
II. REGULATORY BASIS

This Air Operating Permit (AOP) is authorized under the procedures established in WAC 173-401 and Title V of the 1990 Federal Clean Air Act Amendments. The terms and conditions of this permit describe the emissions limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the permitted source.

Permit terms and conditions are divided into the following categories: General Terms and Conditions, Operating Terms and Conditions, Monitoring Terms and Conditions, Recordkeeping Terms and Conditions, and Reporting Terms and Conditions. As used in this permit, there is no distinction between "terms" and "conditions." As such, "condition" shall mean the same as "terms and conditions" as referred to in Title V of the 1990 Federal Clean Air Act Amendments. The conditions required under this permit are determined necessary to assure and provide for certification of compliance with applicable local, state, and federal air pollution regulations and standards.

A comprehensive list of the local, state, and federal air pollution requirements applicable to emissions units and other air pollution sources located at the permittee's facility is provided in Sections V through X. These requirements were determined applicable based on the equipment specifications and regulatory history of each emissions unit as described in the Basis Statement for this permit. These requirements are drawn from numerous regulations date of each requirement generally coincides with the most recent rulemaking activity. In some cases, there are multiple effective dates that reflect differences in federal versus state/local applicability. This situation is most notable with requirements that are in the Washington SIP. To clarify which version of a requirement is applicable to the facility, the effective dates of applicable requirements are presented in the table below.

SWCAA has not been delegated authority by EPA for selected subparts of 40 CFR 60, 40 CFR 61, or 40 CFR 63. All monitoring, reporting, or recordkeeping for those subparts that is required to be sent to the EPA Administrator shall be sent to both SWCAA and the EPA Administrator. Unless otherwise specified in the delegation agreement, once authority for specific subparts of 40 CFR 60, 40 CFR 61, or 40 CFR 63 have been delegated to SWCAA by EPA, all monitoring, reporting, or recordkeeping that is required to be sent to the EPA Administrator shall only be sent to SWCAA.

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<th>State/Local Effective Date</th>
<th>Notes / Exceptions</th>
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Permit No. SW08-15-R0 3 June 13, 2011
III. EMISSIONS UNIT IDENTIFICATION

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<th>ID No.</th>
<th>Unit Name</th>
<th>Unit Description</th>
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<tbody>
<tr>
<td>EU1</td>
<td>Combustion Turbine/HRSG</td>
<td>One General Electric Frame 7FA natural gas fired combustion turbine operating in conjunction with a fired heat recovery steam generator (HRSG). The combustion turbine is equipped with dry low-NOx combustors and a power augmentation system. The combustion turbine has a maximum nominal heat input of 1,900 MMBtu/hr and a base-load rating of 169 MW (electrical). HRSG duct burners have a maximum nominal heat input of 458 MMBtu/hr. The HRSG steam turbine has a base-load rating of 150 MW (electrical). Emissions from the Combustion Turbine/HRSG consist of NOx, CO, SO2, PM, VOC, NH3, HAPs, and TAPs. NOx and CO emissions from this unit are controlled through the use of a selective catalytic reduction (SCR) system and oxidation catalyst.</td>
</tr>
<tr>
<td>ID No.</td>
<td>Unit Name</td>
<td>Unit Description</td>
</tr>
<tr>
<td>-------</td>
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<td>-----------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>EU2</td>
<td>Fuel Gas Heater</td>
<td>One Gas Technology Corporation natural gas fired fuel heater equipped with an Eclipse model WX1000 burner. The Eclipse burner has a maximum rated heat input of 8.7 MMBtu/hr. Emissions from the Fuel Gas Heater consist of NOx, CO, SO2, PM, and VOC. NOx and CO emissions are minimized through the use of a low emission burner design. <em>This unit has been approved but not installed. Installation is dependent on facility access to a high pressure natural gas supply, which has not yet been obtained.</em></td>
</tr>
<tr>
<td>EU3</td>
<td>Cooling Tower</td>
<td>One mechanically-induced-draft, counter-flow, multi-cell cooling tower with a design water circulation rate of 77,000 gal/min. The cooling tower services facility cooling needs including condensation of process steam from the steam turbine. Emissions from the Cooling Tower consist of PM.</td>
</tr>
<tr>
<td>EU4</td>
<td>Emergency Generator</td>
<td>One emergency electrical generator rated at 550 kW. The electric generator is powered by a Caterpillar model 3412 diesel engine (s/n BPG00392) rated at 824 brake horsepower. This unit provides electrical power to vital facility systems in the event of a loss of utility power. Emissions from the Emergency Generator consist of NOx, CO, SO2, PM, and VOC. SO2 emissions are minimized through the use of low sulfur diesel fuel.</td>
</tr>
</tbody>
</table>

**IV. PERMIT PROVISIONS**

40 CFR 51.212

40 CFR 52.12, 40 CFR 52.33

**P1. Credible Evidence**

40 CFR 60.11

For the purposes of submitting compliance certifications or establishing whether a violation of any term or condition of this permit has occurred or is occurring, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the permittee would have been in compliance with a specific term or condition if the appropriate performance or compliance test or procedure would have been performed.

**P2. Insignificant Emission Unit - Restriction**

WAC 173-401-530(6)

Any emissions unit or activity that qualifies as insignificant solely on the basis of provisions in WAC 173-401-530(1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725.
P3. Permit Duration

This permit shall be valid for a fixed term of 5 years.

P4. Confidentiality of Records and Information

The permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to SWCAA. Requests for proprietary and confidential information shall be released only after legal opinion by SWCAA’s legal counsel, and notice to the permittee of the intent to release or deny the release of information.

In the case where the permittee has submitted information to SWCAA under a claim of confidentiality, SWCAA may also require the source to submit a copy of such information directly to the EPA Administrator.

Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.

P5. Standard Conditions

(a) Duty to comply. The permittee must comply with all conditions of this Chapter 401 permit. Any permit noncompliance constitutes a violation of Revised Code of Washington (RCW) Chapter 70.94 and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(b) Need to halt or reduce activity not a defense. 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 in order to maintain compliance with the conditions of this permit.

(c) Permit actions. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(d) Property rights. This permit does not convey any property rights of any sort, or any exclusive privilege.

(e) Duty to provide information. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority 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 shall also furnish to the permitting authority copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.

(f) Permit fees. The permittee shall pay fees in accordance with RCW 70.94.162 as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in RCW 70.94.430 and 70.94.431.
(g) **Emission trading.** No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(h) **Severability.** If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.

(i) **Permit appeals.** This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the permitting authority within thirty days of receipt of the permit pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.

(j) **Permit continuation.** This permit and all terms and conditions contained herein shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

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**P6. Federally Enforceable Requirements** WAC 173-401-625

(a) All terms and conditions in an air operating permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA, except as indicated in paragraph (b) below.

(b) Notwithstanding subsection (a), any terms and conditions included in this permit that are not required under the FCAA or under any of its applicable requirements are specifically designated as "state" or "local" only, and are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the requirements of WAC 173-401-810.

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**P7. Permit Shield** WAC 173-401-640

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements that are specifically identified in this permit as of the date of permit issuance. Nothing in this permit shall alter or affect the following:

(a) The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;

(b) The liability of an owner or operator of a source 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 Section 408(a) of the FCAA;

(d) The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA; and

(e) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70.94.030(19).

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**P8. Emergency Provision** WAC 173-401-645

An "emergency" as defined in WAC 173-401-645(1) shall constitute an affirmative defense to an action brought for noncompliance with technology based emission limitations. The burden of proof lies with the permittee. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(a) An emergency occurred and that the permittee can identify the causes(s) of the emergency;

(b) The permitted facility was at the time being properly operated;
(c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(d) The permittee submitted notice of the emergency to the permitting authority within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health and safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

P9. Permit Expiration – Application Shield  WAC 173-401-710(3)
Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after the permit expires if a timely and complete permit application has been submitted. Operation under the terms and conditions of the expired permit will be allowed until SWCAA takes final action on the renewal application.

P10. Permit Revocation  WAC 173-401-710(4)
The permitting authority may revoke a permit only upon the request of the permittee or for cause. The permitting authority shall provide at least thirty days written notice to the permittee prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the permittee an opportunity to meet with the permitting authority prior to the authority's final decision. A revocation issued under this section may be issued conditionally with a future effective date and may specify that the revocation will not take effect if the permittee satisfies the specified conditions before the effective date.

P11. Reopening for Cause  WAC 173-401-730
This permit shall be reopened and revised under any of the following circumstances:

(a) Additional applicable requirements become applicable to a major air operating permit source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);

(b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

(c) The permitting authority or Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

(d) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings under this section shall not be initiated before a notice of such intent is provided to the AOP source by the permitting authority. Such notice shall be made at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

P12. Excess Emissions  
SWCAA 400-107
The permittee shall report excess emissions to SWCAA as soon as possible. Excess emissions due to startup or shutdown conditions or due to scheduled maintenance shall be considered unavoidable provided the source reports as required under by SWCAA 400-107(1) and adequately demonstrates that the excess emissions could not have been prevented or avoided.

Excess emissions due to upsets shall be considered unavoidable provided that the permittee reports as soon as possible but no later than 48 hours after discovery, and adequately demonstrates that:

(a) The event was not caused by poor or inadequate design, operation, or maintenance, or any other reasonably preventable conditions;
(b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
(c) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded; and
(d) The owner or operator(s) actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs, or other relevant evidence.

V. GENERAL TERMS AND CONDITIONS

G1. Certification of Submittals  
WAC 173-401-520
All application forms, reports, and compliance certifications must be certified by a responsible official. Certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the submittal are true, accurate, and complete.

G2. Duty to Supplement or Correct Application  
WAC 173-401-500(6)
The permittee, upon becoming aware that relevant facts were omitted or incorrect information was submitted in a permit application, shall promptly submit such supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.
G3. Inspection and Entry

The permittee shall allow inspection and entry, upon presentation of credentials and other documents as may be required by law, by the permitting authority or an authorized representative to perform the following:

(a) Enter upon the permittee's premises where an air operating permit source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
(d) As authorized by SWCAA 400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

G4. Schedule of Compliance

The permittee shall continue to comply with all applicable requirements with which the source is currently in compliance, and meet on a timely basis any applicable requirements that become effective during the permit term.

G5. Permit Renewal

The permittee shall submit a complete permit renewal application to SWCAA no later than the date established in the permit. This permit expires on five years from issuance. A renewal application is due on expiration date minus 12 months and a complete renewal application is due no later than expiration date minus 6 months.

G6. Transfer of Ownership or Operational Control

A change in permittee due to transfer of ownership or operational control of an affected source requires a request for administrative permit amendment as governed by WAC 173-401-720.

G7. Misrepresentation and Tampering

The permittee shall not make any false material statement, representation or certification in any form, notice, or report. The permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.
G8. New Source Review

The permittee shall not construct or modify a source that is required to be reviewed under SWCAA 400-110 and -141 or WAC 173-460 (effective 8/21/98) without first receiving an approval or permit under such provisions. Portable sources may be exempt from this requirement if they fulfill the criteria described in G9.

G9. Portable Sources

Portable sources which locate temporarily at the site of an air operating permit source shall be allowed to operate at the temporary location without filing an Air Discharge Permit application provided that:

(a) The source/emissions units are registered with SWCAA;
(b) The source/emissions units have an Air Discharge Permit to operate as a portable source;
(c) The owner(s) or operator(s) notifies SWCAA of the intent to operate at the new location at least ten business days prior to starting the operation;
(d) The owner(s) or operator(s) supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards; and
(e) The owner(s) and/or resident(s) of immediately adjacent properties shall be notified by the owner(s) or operator(s) of the portable source in writing at least 10 business days prior to commencement of operations at the proposed location with copies mailed to SWCAA. Written notification to the adjacent landowners/residents shall be by certified mail with return receipt requested. Such written notification shall include a complete description of the proposed operation, the associated emissions control provisions and equipment, the total estimated project emissions, the name, address and phone number of the person in charge of the operation, and the address and phone number for SWCAA. Written notification shall indicate that all comments shall be directed to SWCAA.

G10. Replacement or Substantial Alteration of Emission Control Technology at an Existing Stationary Source

Prior to replacing or substantially altering emission control technology or equipment installed at an existing stationary source or emission unit, the permittee shall file an air discharge permit application with SWCAA. Construction shall not commence on a project subject to review until SWCAA issues a final air discharge permit or other regulatory order. However, any air discharge permit application filed under this section shall be deemed to be approved without conditions if the Agency takes no action within thirty (30) days of receipt of a complete application.

G11. Outdoor Burning

The permittee is prohibited from conducting outdoor burning except as allowed by SWCAA 425.
G12. Asbestos

The permittee shall comply with the provisions of SWCAA 476 “Standards for Asbestos Control, Demolition and Renovation” when conducting any renovation, demolition or asbestos storage activities at the facility.

G13. Protection of Stratospheric Ozone

The permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR 82, Subparts B and F.


40 CFR 68 requires risk management plans be developed for the substances and thresholds listed in Section 68.130. The permittee shall comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR 68 no later than the following dates:

(a) Three years after the date on which a regulated substance, present above the threshold quantity, is first listed under 40 CFR 68.130; or
(b) The date on which a regulated substance is first present above a threshold quantity in a process.

G15. Reporting of Emission of Greenhouse Gases

WAC 173-441 requires owners and operators of affected facilities to quantify and report emissions of greenhouse gases from applicable source categories listed in WAC 173-441-120. This regulation applies to any facility located in Washington State with total greenhouse gas emissions of ten thousand metric tons CO₂e or more per calendar year. The permittee shall prepare and submit greenhouse gas reports to Ecology in accordance with the provisions of WAC 173-441-050 for each affected facility.

VI. OPERATING TERMS AND CONDITIONS

The following table lists all federal, state, and/or locally enforceable requirements applicable to the permittee. The applicable legal authority is listed below each requirement. Applicable requirements identified as having "plantwide" applicability apply to both EUs and IEUs. Some of the requirements have been partially adopted into the Washington State Implementation Plan (SIP). Only those parts adopted into the Washington SIP are federally enforceable. Requirements which are not required under the FCAA are denoted as state or local only. Monitoring requirements are used to provide a reasonable assurance of compliance with the applicable requirements, and may or may not involve the use of a reference test method.
<table>
<thead>
<tr>
<th>Req. #</th>
<th>Applicable Requirement</th>
<th>Emission Point</th>
<th>Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Req-1</td>
<td>Permittee shall not cause or permit the emission of an air contaminant that exceeds 20% opacity for more than 3 minutes (aggregate), in any 1 hour period except as provided in SWCAA 400-040(1). Reference Method: SWCAA Method 9 (SWCAA 400, App. A) [SWCAA 400-040(1)]</td>
<td>Plantwide</td>
<td>M1</td>
</tr>
<tr>
<td>Req-2</td>
<td>Permittee shall not cause or permit fallout of particulate matter beyond the source's property boundary in sufficient quantity to interfere unreasonably with use and enjoyment of the property on which the fallout occurs. [SWCAA 400-040(2)]</td>
<td>Plantwide</td>
<td>M2 M4</td>
</tr>
<tr>
<td>Req-3</td>
<td>Permittee shall take reasonable precautions to prevent the release of air contaminants from any operation that emits fugitive emissions. [ADP 10-2929, Condition 9] [SWCAA 400-040(3)]</td>
<td>Plantwide</td>
<td>M2 M4</td>
</tr>
<tr>
<td>Req-4</td>
<td>Operations that cause or contribute to odors that unreasonably interfere with any other property owner's use and enjoyment of their property shall use recognized good practice and procedures to reduce those odors to a reasonable minimum. [ADP 10-2929, Condition 10] [SWCAA 400-040(4)]</td>
<td>Plantwide</td>
<td>M4</td>
</tr>
<tr>
<td>Req-5</td>
<td>Permittee shall not cause or permit the emission of any air contaminant detrimental to persons, property or business. [SWCAA 400-040(5)]</td>
<td>Plantwide</td>
<td>M4</td>
</tr>
<tr>
<td>Req-6</td>
<td>Permittee shall not cause or permit any emissions unit to emit a gas containing in excess of 1,000 ppm of sulfur dioxide on a dry basis, corrected to 7% O₂ or 12% CO₂ as required by the applicable emission standard for combustion sources, and based on the average of 60 consecutive minutes. [SWCAA 400-040(6)]</td>
<td>Plantwide</td>
<td>M6</td>
</tr>
<tr>
<td>Req-7</td>
<td>Permittee shall not cause or permit the installation or use of any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040. [SWCAA 400-040(7)]</td>
<td>Plantwide</td>
<td>Compliance Certification</td>
</tr>
<tr>
<td>Req-8</td>
<td>Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions. [SWCAA 400-040(8)(a)]</td>
<td>Plantwide</td>
<td>M2 M4</td>
</tr>
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<td>Req. #</td>
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</table>
| Req-9  | Permittee shall not cause or permit emissions of particulate matter from a combustion or incineration emission unit in excess of 0.1 gr/dscf of exhaust gas corrected to appropriate oxygen level.  
Reference Method: 40 CFR 60, Appendix A, Method 5  
[SWCAA 400-050(1)&(3)]                                                                                                                                   | Plantwide      | M3         |
| Req-10 | Permittee shall not cause or allow emissions of particulate matter from a general process unit in excess of 0.1 gr/dscf of exhaust gas.                                                                                     | Plantwide      | M3         |
| Req-11 | Permittee shall perform all abrasive blasting with sand inside a blasting booth, enclosure, or structure designed to capture fugitive particulate matter. Outdoor blasting shall be performed with either steel shot or abrasive containing less than 1% (by mass) material that will pass through a No. 200 sieve.  
[SWCAA 400-070(8)]                                                                                                                                 | Plantwide      | M2         |
| Req-12 | Visible emissions shall not exceed the following for more than 3 minutes (aggregate) in any one hour period:  
| Emission Unit | Opacity Limit  
Combustion Turbine/HRSG (regular operation) | 5%  
Combustion Turbine/HRSG (adjustment/tuning) | 20%  
Diesel engine exhaust | 10%  
All other equipment | 0%  
| The permittee shall notify SWCAA of combustion turbine/HRSG adjustment/tuning periods at least 30 days prior to scheduled occurrence. SWCAA must approve the proposed adjustment/tuning period for the alternative opacity limit to take effect. The visible emissions limit for diesel engine exhaust shall not apply during engine startup periods.  
Reference Method: SWCAA Method 9  
[ADP 10-2929, Condition 8]                                                                                                                                 | EU1 EU2 EU3 EU4 | M1         |
| Req-13 | Each pollution control device shall be operated whenever the process equipment served by that control device is in operation. Control devices shall be operated and maintained in accordance with the manufacturer’s specifications. Furthermore, control devices shall be operated in a manner that minimizes emissions.  
[ADP 10-2929, Condition 11]                                                                                                                                 | EU1 EU2 EU3 EU4 | Compliance Certification |
<table>
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</table>
| Req-14 | Combined emissions from approved facility operations shall not exceed:  
**Pollutant**  
NO\(_x\)  
CO  
PM/PM\(_{10}\) (total)  
PM\(_{2.5}\) (total)  
VOC  
SO\(_2\)  
NH\(_3\)  

**Emission Limit**  
98.77 tpy  
70.08 tpy  
99.66 tpy  
99.12 tpy  
44.17 tpy  
84.36 tpy  
128.05 tpy  |
EU1  
EU2  
EU3  
EU4  |
| [ADP 10-2929, Condition 7] |
| Req-15 | Permittee shall maintain and operate equipment in a manner consistent with good air pollution control practices for minimizing emissions.  |
| [40 CFR 60.11(d)]  
[SWCAA 400-115] |
| EU1  |
| M1  
M2  |
| Req-16 | NO\(_x\) emissions from the Combustion Turbine/HRSG shall not exceed 15 ppmvd @ 15% O\(_2\) or 0.43 lb/MW-hr (30 unit operating day rolling average). For the purposes of this requirement, emissions during periods of startup, shutdown and malfunction are included when calculating the 30 unit operating day rolling average.  |
| Reference Method: EPA Method 7E / 20  
[40 CFR 60.4320]  
[SWCAA 400-115] |
| EU1  |
| M5  
M7  
M9  
M10  |
| Req-17 | NO\(_x\) emissions from the Combustion Turbine/HRSG shall not exceed:  
21.3 lb/hr (1-hr avg); and  
2.5 ppmvd @ 15% O\(_2\) (24-hr avg).  |
| Reference Method: EPA Method 7E  
[ADP 10-2929, Conditions 1 & 2] |
| EU1  |
| M5  
M7  
M10  |
| Req-18 | CO emissions from the Combustion Turbine/HRSG shall not exceed:  
31.1 lb/hr (1-hr avg);  
6.0 ppmvd @ 15% O\(_2\) (1-hr avg); and  
2.0 ppmvd @ 15% O\(_2\) (annual avg).  |
| Reference Method: EPA Method 10  
[ADP 10-2929, Conditions 1 & 2] |
| EU1  |
| M5  
M7  
M10  |
<table>
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<tr>
<td>Req-19</td>
<td>SO₂ emissions from the Combustion Turbine/HRSG shall not exceed 20.7 lb/hr (1-hr avg). Reference Method: Mass Balance [ADP 10-2929, Condition 1]</td>
<td>EU1</td>
<td>M5 M6</td>
</tr>
<tr>
<td>Req-20</td>
<td>PM/PM₁₀/PM₂·₅ emissions from the Combustion Turbine/HRSG shall not exceed 23.2 lb/hr (1-hr avg). Reference Method: EPA Method 5/202 [ADP 10-2929, Condition 1]</td>
<td>EU1</td>
<td>M5 M6 M10</td>
</tr>
<tr>
<td>Req-22</td>
<td>NH₃ emissions from the Combustion Turbine/HRSG shall not exceed: 31.4 lb/hr (1-hr avg); and 10.0 ppmvd @ 15% O₂ (24-hr avg). Reference Method: BAAQMD Method ST-1B [ADP 10-2929, Conditions 1 &amp; 2]</td>
<td>EU1</td>
<td>M5 M7 M10</td>
</tr>
<tr>
<td>Req-23</td>
<td>Short-term emission limits established under ADP 10-2929 (any emission limit with a 1-hr or 24-hr averaging period) shall not apply during startup, shutdown, and approved periods of combustion turbine adjustment/tuning. Startup and shutdown periods are defined below. The permittee shall notify SWCAA in writing at least 30 days prior to occurrence of any affected turbine adjustment/tuning period. Each adjustment/tuning period must be approved by SWCAA for it to qualify under these provisions. A startup period begins with the introduction of fuel to the combustion turbine. A startup period ends when the earlier of the following events occurs: (a) The combustion turbine achieves stable operation and maintains compliance with the short-term emission limits established in Conditions #1 and #2; (b) 360 minutes have elapsed since fuel was first introduced to the combustion turbine on a cold startup. A cold startup is any startup occurring after the steam turbine has been offline for a period of 48 hours or more;</td>
<td>EU1</td>
<td>M8</td>
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<td>Req. #</td>
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<tr>
<td>(c)</td>
<td>240 minutes have elapsed since fuel was first introduced to the combustion turbine on a warm startup. A warm startup is any startup occurring after the steam turbine has been offline for a period of more than 8 but less than 48 hours; or</td>
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<tr>
<td>(d)</td>
<td>120 minutes have elapsed since fuel was first introduced to the combustion turbine on a hot startup. A hot startup is any startup occurring after the steam turbine has been offline for a period of 8 hours or less.</td>
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<td>A shutdown period begins at any time all of the following are true:</td>
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<td></td>
<td>(a) The combustion turbine/HRSG is not in compliance with any short-term emission limit in Conditions #1 and #2;</td>
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<td>(b) The combustion turbine is ramping down from normal load for the purpose of ceasing operation; and</td>
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<td>(c) The combustion turbine gross output is at, or less than, 90MW.</td>
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<td>A shutdown period ends when the earliest of the following events occurs:</td>
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<td>(a) Fuel is no longer being combusted by the turbine;</td>
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<td>(b) The unit ramps back up after an aborted shutdown, achieves stable operation, and maintains compliance with the short-term emission limits in ADP 10-2929, Conditions 1 and 2; or</td>
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<td></td>
<td>(c) 30 minutes has elapsed since the shutdown period began.</td>
<td></td>
<td>[ADP 10-2929, Condition3]</td>
</tr>
<tr>
<td>Req-24</td>
<td>Greenhouse gas emissions from the Combustion Turbine/HRSG shall not exceed 1,100 lb/MW-hr (annual avg).</td>
<td>EU1</td>
<td>M9</td>
</tr>
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<td>[WAC 173-407-130]</td>
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<tr>
<td>Req-25</td>
<td>The NOX emission control system installed for use with the Combustion Turbine/HRSG shall be guaranteed by the manufacturer to reduce NOX emission concentrations to 2.5 ppm or less and maintain NH3 slip at 10 ppm or less while firing on natural gas.</td>
<td>EU1</td>
<td>Compliance Certification [ADP 10-2929, Condition 13]</td>
</tr>
<tr>
<td>Req-26</td>
<td>The NOX control system for the Combustion/HRSG shall be operated in such a manner as to minimize the arithmetic sum of NOX and NH3 emissions on a concentration basis. Technical feasibility, cost impact, relative environmental gain, and operational reliability shall all be considered in identifying appropriate NOX and NH3 target values. This requirement does not apply whenever the arithmetic sum of the NOX and NH3 concentrations in units of ppmvd @ 15% O2 cannot be maintained below 5.0.</td>
<td>EU1</td>
<td>M11 [ADP 10-2929, Condition 14]</td>
</tr>
<tr>
<td>Req. #</td>
<td>Applicable Requirement</td>
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<tr>
<td>Req-27</td>
<td>Whenever the NOX control system for the Combustion Turbine/HRSG is unable to maintain NH3 emission concentrations at or below 5.0 ppmvd @ 15% O2 (24-hour average), the permittee shall notify SWCAA within two business days. The permittee shall immediately identify any repairs to the control system that are necessary to maintain NH3 emissions at or below 5.0 ppmvd @ 15% O2 (24-hour average). If repairs can be completed within 10 business days, the permittee shall make such repairs and submit a report to SWCAA describing the necessary repairs and the date of completion. If repairs cannot be completed within 10 business days, the permittee shall submit a repair schedule to SWCAA within the 10 business day period. SWCAA may either accept the proposed repair schedule, or establish an alternative repair schedule by replying in letter format to the permittee within 10 business days of proposal. Control system repairs shall completed no later than the completion date proposed by the permittee or established by SWCAA. At a minimum, the following factors shall be considered in determining an appropriate repair schedule: (a) The cause of the problem; (b) The magnitude of the ammonia emissions; (c) The availability of necessary parts and labor; (d) The time of year (e.g. ozone season; peak electrical demand season) and the potential environmental impact of the repair or delay in repair; (e) If an outage is required, the date of the next scheduled outage; and (f) The need for an extended outage to perform repairs.</td>
<td>EU1</td>
<td>M7</td>
</tr>
<tr>
<td>Req-28</td>
<td>The ammonia concentration of aqueous ammonia stored and used in the ammonia injection system for the Combustion Turbine/HRSG shall be maintained at less than 20%. The storage or use of anhydrous ammonia is prohibited.</td>
<td>EU1</td>
<td>M16</td>
</tr>
<tr>
<td>Req-29</td>
<td>Permittee shall: (1) hold SO2 Acid Rain allowances, as of the allowance transfer deadline, in the source's account (after deductions under §73.34(c)) not less than the total annual emissions of SO2 for the previous calendar year from the affected units at the source; and (2) comply with the applicable Acid Rain emissions limitation for SO2.</td>
<td>EU1</td>
<td>Compliance Certification</td>
</tr>
</tbody>
</table>

[ADP 10-2929, Condition 15]

[ADP 10-2929, Condition 17]

[40 CFR 72.9(c)(1)]

[WAC 173-406-106(3)(a)(i)]]
<table>
<thead>
<tr>
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</thead>
</table>
| Req-30 | Permittee shall certify, operate, and maintain continuous emissions monitoring systems (CEMS) with an automated data acquisition and handling system for determining and recording all SO₂, NOₓ, and CO₂ emissions from the Combustion Turbine/HRSG exhaust stack as required by 40 CFR 75.  
[40 CFR 75.10(a)] | EU1 | M6  
M7 |
| Req-31 | Permittee shall not burn any fuel in the Combustion Turbine/HRSG which contains total potential sulfur emissions in excess of 0.060 lb SO₂/MMBtu of heat input.  
[40 CFR 60.4330(a)(2)]  
[SWCAA 400-115] | EU1 | M6 |
| Req-32 | Permittee shall only fire natural gas in the Combustion Turbine/HRSG and Fuel Gas Heater.  
[ADP 10-2929, Condition 18] | EU1  
EU2 | Compliance Certification |
| Req-33 | NOₓ emissions from the Fuel Gas Heater shall not exceed:  
1.39 tpy; and  
30 ppmvd @ 3% O₂ (1-hr avg).  
Reference Method:  
EPA Method 7E  
[ADP 10-2929, Condition 6] | EU2 | M12  
M13 |
| Req-34 | CO emissions from the Fuel Gas Heater shall not exceed 1.0 tpy.  
1.41 tpy; and  
50 ppmvd @ 3% O₂ (1-hr avg).  
Reference Method:  
EPA Method 10  
[ADP 10-2929, Condition 6] | EU2 | M12  
M13 |
| Req-35 | PM/PM₁₀/PM₂.₅ emissions from the Fuel Gas Heater shall not exceed 0.29 tpy.  
Reference Method:  
EPA Method 5/202  
[ADP 10-2929, Condition 6] | EU2 | M12 |
| Req-36 | The Fuel Gas Heater shall be equipped with a dedicated fuel meter.  
[ADP 10-2929, Condition 21] | EU2 | Compliance Certification |
| Req-37 | PM emissions from Cooling Tower drift shall not exceed 1.08 tpy.  
[ADP 10-2929, Condition 4] | EU3 | M14 |
<table>
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</thead>
<tbody>
<tr>
<td>Req-38</td>
<td>Emissions from the emergency generator shall not exceed the following: Pollutant Emission Limit NO\textsubscript{X} 0.87 tpy</td>
<td>EU4</td>
<td>M15</td>
</tr>
<tr>
<td></td>
<td>CO 0.50 tpy</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>PM/PM\textsubscript{10}/PM\textsubscript{2.5} 0.12 tpy</td>
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<td></td>
<td>[ADP 10-2929, Condition 5]</td>
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<tr>
<td>Req-39</td>
<td>The sulfur content of fuel oil fired in the emergency generator shall not exceed 0.0015% by weight. Fuel supplier certifications of sulfur content may be used to demonstrate compliance with this requirement.</td>
<td>EU4</td>
<td>M15</td>
</tr>
<tr>
<td>Req-40</td>
<td>The Emergency Generator shall be equipped with a non-resettable hour meter to record hours of operation.</td>
<td>EU4</td>
<td>Compliance Certification</td>
</tr>
<tr>
<td></td>
<td>[ADP 10-2929, Condition 19]</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>[40 CFR 63.6625(f)]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req-41</td>
<td>Operation of the Emergency Generator for the purposes of testing and maintenance shall not exceed 170 hr/yr. This limit does not apply to emergency service during actual power outages.</td>
<td>EU4</td>
<td>M15</td>
</tr>
<tr>
<td></td>
<td>[ADP 10-2929, Condition 19]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req-42</td>
<td>Effective May 3, 2013, operation of each emergency engine for purposes other than emergency operation, maintenance and testing, or limited non-emergency operation as described below is prohibited. (a) There is no limit on engine operation in emergency situations; (b) Maintenance checks and readiness testing are allowed if recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Operation for maintenance checks and readiness testing may not exceed 100 hr/yr; and (c) Emergency engines may be operated for up to 50 hr/yr in nonemergency situations, but such operation cannot be used for peak shaving or to generate income for supplying power to an electric grid. Nonemergency operation is counted against the 100 hr/yr allowance for maintenance and readiness testing.</td>
<td>EU4</td>
<td>M15</td>
</tr>
<tr>
<td></td>
<td>[40 CFR 63.6640(f)(1)]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req-43</td>
<td>Effective May 3, 2013, the permittee shall minimize the time each emergency engine spends at idle and minimize the engine’s startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.</td>
<td>EU4</td>
<td>M15</td>
</tr>
<tr>
<td></td>
<td>[40 CFR 63.6625(h) &amp; Table 2c]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Req. #</td>
<td>Applicable Requirement</td>
<td>Emission Point</td>
<td>Monitoring</td>
</tr>
<tr>
<td>-------</td>
<td>------------------------</td>
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</tr>
</tbody>
</table>
| Req-44 | Effective May 3, 2013, the permittee shall conduct the following maintenance for each emergency engine:  
(a) Change oil and filter every 500 hours of operation or annually, whichever comes first except as provided in 40 CFR 63.6625(i);  
(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;  
(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary;  
(d) Change engine coolant annually; and  
(e) Change fuel filter annually. | EU4 | M15 |

**VII. MONITORING TERMS AND CONDITIONS**

To assure compliance with all applicable requirements, the permittee shall perform the monitoring program specified below. Specified monitoring is not required whenever an emission unit is not operated during a time period equal to or greater than the designated monitoring period. For these periods, the permittee shall record and report the reason why and the length of time the emission unit was not operated. Pursuant to WAC 173-401-530(2)(c), the following monitoring requirements do not apply to IEUs.

The permittee shall make a record of all required monitoring activities as described in Sections K1 and K2 of this permit.

**M1. Visible Emissions Monitoring  
WAC 173-401-615(1)(b)**

This monitoring requirement applies to Reqs 1, 12, 15

On a monthly basis, the permittee shall perform a brief qualitative observation of affected emission units during daylight hours for the purpose of identifying potential visible emissions violations. Based upon the qualitative observation, the permittee shall take one or more of the following actions:

(a) If no visible emissions are observed, the permittee shall make a record of the observation, and no further action is necessary.

(b) If visible emissions are observed, the permittee shall identify the source of the emissions, and confirm whether or not the pertinent equipment is experiencing a malfunction and that all relevant air pollution control equipment is operating properly. The permittee shall take corrective action to resolve the problem within 24 hours of initial discovery, and shall notify SWCAA regarding its progress in resolving the problem.

(c) Subsequent to taking corrective action, the permittee shall perform a second qualitative observation of affected emission units. If no visible emissions are observed, then no further action is necessary. If visible emissions are still observed, the permittee shall demonstrate compliance with applicable visible emission limits by conducting a visible emissions evaluation in
accordance with SWCAA Method 9 within 72 hours of initial discovery. For visible emissions in compliance with applicable visible emission limits, no further action is necessary.

If observed visible emissions are demonstrated to be out of compliance with applicable visible emissions limits, the permittee shall report an excess emission as described in Section R1 and make a record of the event. Additional adjustments, repairs, and/or maintenance shall be performed as soon as practical to reduce the visible emissions to a level at or below the applicable opacity limit.

Implementation of corrective action does not shield the permittee from enforcement action by SWCAA or from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

M2. Fugitive Emissions/Fallout Monitoring

This monitoring requirement applies to Reqs 2, 3, 8, 11, 15

On a monthly basis, or in response to a complaint, the permittee shall perform an inspection of affected emission units during daylight hours for the purpose of identifying fugitive emissions or particulate matter fallout. Based upon results of the inspection, the permittee shall take one or more of the following actions:

(a) If no particulate matter fallout or fugitive emissions are observed, the permittee shall make a record of the observation, and no further action is necessary.

(b) If particulate matter fallout or fugitive emissions are observed during an inspection, the permittee shall identify the source of the emissions and confirm whether the affected equipment and/or associated air pollution control equipment is operating properly. The permittee shall resolve identified problems within 24 hours of initial discovery, or notify SWCAA by the next business day of the progress made in resolving the problem. Reasonable precautions and good work practices shall be employed to minimize emissions for the duration of the event. Implementation of corrective action does not relieve the permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

M3. Particulate Matter Monitoring

This monitoring requirement applies to Reqs 9, 10

On a monthly basis, the permittee shall perform a qualitative observation of affected emission units during daylight hours while the units are in operation for the purpose of identifying potential violations of applicable particulate matter emission limits. Based upon the qualitative observation the permittee shall take one or more of the following actions:

(a) If no visible emissions are observed, affected emission units are assumed to be in compliance with applicable emission limits. The permittee shall make a record of the observation and no further action is necessary.

(b) If visible emissions are observed, the permittee shall verify that the emission unit or process emitting the visible emissions and any associated air pollution control equipment are operating properly. If the equipment is not operating properly, the permittee shall resolve the problem no later than 24 hours after initial discovery, or notify SWCAA by the next business day of the
progress made in resolving the problem. Subsequent to resolving the problem, a second qualitative observation shall be made. If visible emissions are still observed, the permittee shall continue to make adjustments and/or repairs until such time as the affected emission unit is demonstrated to be in compliance. Implementation of corrective actions does not shield the permittee from enforcement action by SWCAA or from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

**M4. Complaint Monitoring**

This monitoring requirement applies to Reqs 2-5, 8

The permittee shall record, and maintain record of, any air quality related complaints received by either the permittee or SWCAA. All complaints shall be investigated no later than 1 work day after the permittee has been notified. The permittee shall determine the validity of each complaint and the cause of any emissions that may have prompted the complaint, and initiate appropriate corrective action in response to the complaint. Within 24 hours of notification and investigation, permittee shall resolve the subject of the complaint, or notify SWCAA by the next working day of progress made in resolving the complaint.

**Combustion Turbine/HRSG**

**M5. Operations Monitoring**

This monitoring requirement applies to Reqs 16-22

The permittee shall monitor and record operational parameters/events as described below.

(a) Hours of operation;
(b) Hourly heat input (MMBtu/hr) for every hour or part of any hour during which fuel is combusted following procedure 5 in 40 CFR 75, Appendix F;
(c) Hourly fuel consumption (MMscf/hr);
(d) Hourly turbine gross output (MW);
(e) Startup and shutdown periods;
(f) CEMS calibration and cylinder gas audit results;
(g) Differential pressure across each catalyst bed monitored continuously and recorded once per workshift;
(h) Temperature before and after each catalyst bed monitored continuously and recorded once per workshift;
(i) Hourly emission rate of NOX, CO, SO2, and NH3 (lb/hr);
(j) Hourly ammonia consumption;
(k) Average hourly O2 concentration (dry volume percent);
(l) Average hourly NOX and CO emission concentration (ppmvd @ 15% O2); and
(m) Maintenance and repair activities.
40 CFR 60.4365, 40 CFR 75.11
WAC 173-401-615(1), WAC 173-406-106(2)
ADP 10-2929 Condition 34
ADP 10-2929 App D

**Combustion Turbine/HRSG**

**M6. General Emission Monitoring**

This monitoring requirement applies to Reqs 6, 19-21, 30, 31

The permittee shall determine the fuel sulfur content of natural gas combusted in the Combustion Turbine on an annual basis in accordance with 40 CFR 75.11 and ADP 10-2929, Appendix D. Fuel sampling results shall be reported to SWCAA as described in Section R7 of this permit.

Hourly SO₂ emission rates shall be calculated from recorded heat input values and the most recent sulfur content monitoring results in accordance with 40 CFR 75, Appendix D. For pipeline natural gas, an emission factor of 0.0006 lb/MMBtu may be used to calculate emissions. For natural gas that does not qualify as pipeline natural gas, SO₂ emissions shall be calculated using equation D1-h of 40 CFR 75 and actual fuel sulfur content as provided in 40 CFR 75, Appendix D, Section 2.3.

Hourly VOC and PM emissions shall be calculated from recorded heat input values and the most recent emission test data for the Combustion Turbine.

Hourly emission calculations shall be based on discrete CEM clock hours (block average).

40 CFR 60.4345, 40 CFR 60.4405
40 CFR 60 App B & F, 40 CFR 75
WAC 173-406-106(2)
ADP 10-2929 Conditions 16 & 32
ADP 10-2929 App B

**Combustion Turbine/HRSG**

**M7. NOₓ, CO and NH₃ Continuous Emission Monitoring**

This monitoring requirement applies to Reqs 16-18, 22, 27, 30

The permittee shall install and maintain a continuous emission monitoring and data acquisition and handling system (CEMS) to monitor emission concentrations and rates of NOₓ and CO and emission concentrations of O₂ from the exhaust stack of the Combustion Turbine/HRSG. The permittee shall install and maintain a predictive emission monitoring and data acquisition and handling system (PEMS) to monitor emission concentrations and rates of NH₃ from the exhaust stack of the Combustion Turbine/HRSG.

Each CEMS and PEMS shall be installed and maintained in accordance with the requirements and specifications identified in Appendix B of this permit. CEMS and PEMS systems shall be certified and operable during combustion turbine/HRSG operation. CEMS and PEMS data shall be available for at least 95% of combustion turbine operating hours (annual average). RATA and RAA test results shall be submitted to SWCAA as described in Section R8 of this permit.

Hourly NOₓ emission rates (lb/MMBtu) shall be calculated based on the monitored NOₓ emission concentration (ppmv) and diluent concentration (dry volume percent O₂) in accordance with the procedures in 40 CFR 75, Appendix F. Hourly CO emission rates (lb/MMBtu) shall be calculated based on the monitored CO emission concentration (ppmv) and diluent concentration (dry volume percent O₂) in accordance with Equation 19-1 from 40 CFR Part 60, Appendix A.
Hourly NO\textsubscript{X} and CO emissions (lb/hr) shall be calculated using the respective hourly emission rate and the average heat input to the Combustion Turbine/HRSG. Hourly NH\textsubscript{3} emission rates (lb/hr) shall be calculated based on the monitored NH\textsubscript{3} emission concentration (ppmv) and calculated exhaust stack flowrate as described in Appendix B of this permit.

Hourly emission averages shall be based on discrete CEM clock hours (block average). 24-hr average emission concentrations shall be defined as the average emission concentration during each of the most recent 24 operating hours excluding startup/shutdown periods and/or upset events as defined in applicable regulations. Annual average emission concentrations shall be defined as the average emission concentration during each operating hour in the most recent 365 calendar days excluding periods of startup and shutdown and excused upset events.

**Combustion Turbine/HRSG**

**M8. Startup and Shutdown Emissions**

ADP 10-2929 Conditions 26 & 27

This monitoring requirement applies to Req 23

Combustion Turbine/HRSG startup and shutdown periods shall be clearly identified and recorded in the facility's DAHS. Emissions during the startup and shutdown events shall be determined from CEMS data if emissions are within the measurement range of the CEMS. If validated CEMS data is not available, emissions shall be determined using vendor supplied emission factors, source test data, and/or data substitution methods approved by SWCAA. Emissions during startup and shutdown events must be included when determining compliance with annual facility wide emission limits.

**Combustion Turbine/HRSG**

**M9. Greenhouse Gas Emission Monitoring**

WAC 173-407-140

WAC 173-407-230

This monitoring requirement applies to Req 24

The permittee shall collect and maintain the following data in accordance with WAC 173-407-230:

(a) Type of fuel combusted;
(b) Fuel usage and heat content;
(c) Electrical output (MWh); and
(d) Greenhouse gas emissions from the baseload electric generation facility.

The permittee shall divide total calculated greenhouse gas emissions by total electricity produced in each calendar year to determine compliance with applicable performance standards (lb GHG/MW-hr).

**Combustion Turbine/HRSG Emission Testing**

ADP 10-2929 Condition 31

ADP 10-2929 App A

This monitoring requirement applies to Reqs 16-18, 20-22

The Combustion Turbine/HRSG shall be emission tested for NO\textsubscript{X}, CO and NH\textsubscript{3} on a continuing 12 month cycle in accordance with the protocol found in Appendix A of this permit. The Combustion Turbine/HRSG shall be emission tested for PM and VOC on a continuing 60 month cycle in accordance with the protocol found in Appendix A of this permit.
Emission test reports shall be submitted to SWCAA as described in Section R8 of this permit. All emission test results shall be reported in units that correspond to applicable emission limitations contained in this permit.

**Combustion Turbine/HRSG**

**M11. NO\textsubscript{X} Emission Control System Trials**

ADP 10-2929 Condition 33

ADP 10-2929 App C

This monitoring requirement applies to Req 26

The permittee shall conduct annual emission trials of the Combustion Turbine/HRSG for the purpose of determining the contemporaneous relationship between NO\textsubscript{X} and NH\textsubscript{3} emission concentrations at typical operating conditions. Emission trials shall be conducted as follows:

(a) The Combustion Turbine shall be operated at full-load condition during the testing.
(b) The NO\textsubscript{X} CEMS and the NH\textsubscript{3} PEMS shall be used to determine respective exhaust concentrations.
(c) The NO\textsubscript{X} control system shall be adjusted until a NO\textsubscript{X} exhaust concentration of 2.0 ppmvd @ 15% O\textsubscript{2} is achieved. The NO\textsubscript{X} and NH\textsubscript{3} exhaust concentrations shall be monitored and recorded for at least 15 minutes after the exhaust concentrations have stabilized (either ≤ 5% or 0.1 ppmv change in concentration per minute).
(d) The NO\textsubscript{X} control system shall be adjusted until the NO\textsubscript{X} exhaust concentration is lowered by a value of 0.2 ppmvd @ 15% O\textsubscript{2}. The NO\textsubscript{X} and NH\textsubscript{3} exhaust concentrations shall be monitored and recorded for at least 15 minutes after the exhaust concentrations have stabilized (either ≤ 5% or 0.1 ppmv change in concentration per minute).
(e) The above procedure shall be repeated, targeting incrementally lower NO\textsubscript{X} concentrations, until NH\textsubscript{3} exhaust concentrations exceed 2.5 ppmvd @ 15% O\textsubscript{2}.

Emission trial results shall be submitted to SWCAA as described in Section R9 of this permit.

**M12. Fuel Gas Heater General Emission Monitoring**

ADP 10-2929 Condition 30

This monitoring requirement applies to Reqs 33-35

The permittee shall monitor and record the following operational parameters for each month of Fuel Gas Heater operation:

(a) Fuel consumption; and
(b) Maintenance/repair activities.

Emissions of PM\textsubscript{10}, VOC and SO\textsubscript{2} from the Fuel Gas Heater shall be calculated from recorded fuel consumption and the following emission factors:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM/PM\textsubscript{10}/PM\textsubscript{2.5}</td>
<td>0.0115 lb/MBtu</td>
</tr>
<tr>
<td>VOC</td>
<td>0.038 lb/MBtu</td>
</tr>
<tr>
<td>SO\textsubscript{2}</td>
<td>0.0006 lb/MBtu</td>
</tr>
</tbody>
</table>
M13. Fuel Gas Heater

NO\textsubscript{x} and CO Emission Monitoring

This monitoring requirement applies to Reqs 33, 34

The Fuel Gas Heater shall be emission tested for NO\textsubscript{x} and CO on a continuing 10 year cycle in accordance with the protocol found in Appendix C of this permit.

Emission monitoring of NO\textsubscript{x} and CO emissions from the Fuel Gas Heater shall be performed annually in accordance with the protocol found in Appendix D of this permit. Emission monitoring is not required during any year in which an emission test is conducted.

Emissions of NO\textsubscript{x} and CO from the Fuel Gas Heater shall be calculated from recorded fuel consumption and data from the most recent emission test.

M14. Cooling Tower Emission Monitoring

This monitoring requirement applies to Req 37

The permittee shall collect a minimum of three samples from the cooling water discharge of the cooling tower during each calendar quarter. Each sample shall be analyzed for total dissolved solids (TDS).

The permittee shall monitor and record the operational parameters listed below for each month of Cooling Tower operation:

(a) Hours of operation;
(b) Average water circulation rate (gpm); and
(c) TDS sample results.

Emissions of PM from the Cooling Tower shall be calculated from recorded hours of operation, the manufacturer's specified drift factor, average water circulation rate, and average TDS sample value using the following equation:

\[
\text{PM/PM_{10}} \text{ (lb/hr)} = \frac{\text{drift rate} \times \text{water flow rate (gal)}}{100} \times \frac{60 \text{ min}}{\text{min}} \times \frac{8.34 \text{ lb}}{\text{gal H}_2\text{O}} \times \frac{\text{sampled TDS (ppm)}}{1,000,000}
\]

40 CFR 63.6655 & Table 6

M15. Emergency Generator Monitoring

This monitoring requirement applies to Reqs 38-39, 41-44

The permittee shall monitor and record the following operational parameters for the Emergency Generator:

(a) The number of hours of engine operation in each calendar year shall be recorded from the non-resettable hour meter. The permittee shall document how many hours are spent for emergency and nonemergency operation, including what classified the operation as emergency;
(b) The sulfur content of fuel oil fired in the engine. Fuel supplier certifications may be used to demonstrate compliance; and
(c) Each incidence of maintenance and repairs conducted according to the manufacturer's emission related operation and maintenance instructions or the facility developed maintenance plan. Activities to be documented include, but are not limited to, oil and oil filter changes, air cleaner inspections, and inspection of hoses and belts.

Emissions from the Emergency Generator shall be calculated from recorded hours of operation using the following emission rates:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>10.28 lb/hr</td>
</tr>
<tr>
<td>CO</td>
<td>5.94 lb/hr</td>
</tr>
<tr>
<td>VOC</td>
<td>0.22 lb/hr</td>
</tr>
<tr>
<td>PM/PM_{10}/PM_{2.5}</td>
<td>1.41 lb/hr</td>
</tr>
<tr>
<td>SO\textsubscript{2}</td>
<td>0.009 lb/hr</td>
</tr>
</tbody>
</table>

**M16. Ammonia Concentration Monitoring**

ADP 10-2929, Condition 28

This monitoring requirement applies to Req 28

The permittee shall maintain a record of the delivery date and supplier's certification of ammonia concentration for each ammonia shipment received at the facility.

**M17. Plantwide Emission Monitoring**

ADP 10-2929, Condition 42(i)

This monitoring requirement applies to Req 14

On a monthly basis, the permittee shall determine the sum of NO\textsubscript{x}, CO, PM, VOC, SO\textsubscript{2} and NH\textsubscript{3} emissions from all emission units at the facility in accordance with applicable monitoring requirements. The permittee shall use the monthly emission summaries to calculate total plantwide emissions on a 12-month rolling basis (current month plus 11 preceding months).

**VIII. RECORDKEEPING TERMS AND CONDITIONS**

The permittee shall maintain files of all information, including all reports and notifications, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The recordkeeping requirements listed below do not apply to insignificant emission units (IEUs) pursuant to WAC 173-401-530(2)(c).
K1. **General Recordkeeping**

Permittee is required to keep the following records as applicable:

(a) Inspections and Certifications
   (1) Date and time of the inspection or certification;
   (2) Name and title of the person who conducted the inspection or certification;
   (3) Identification of the unit or activity being inspected or certified;
   (4) Operating conditions of the unit or the type of activity occurring at the time of the inspection or certification;
   (5) Compliance status of each monitored requirement as described in Sections V and VII of this Permit; and
   (6) Description of corrective action (if any) taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.

(b) Complaints
   (1) Date and time of complaint;
   (2) Name of the complainant;
   (3) The nature of the complaint;
   (4) Date and time of follow-up inspection;
   (5) The name and title of the person who conducted the follow-up inspection; and
   (6) Description of corrective action (if any) taken in response to complaint.

(c) Sampling and Emissions Testing
   (1) Date sampling was performed;
   (2) Entity that performed the sampling;
   (3) Name and title of the person or the entity that performed the sampling or testing;
   (4) Analytical techniques used to take the sample;
   (5) Operating conditions existing at the time of sampling or measurement to include, as a minimum for emission point source testing:
      (A) Heat input (million Btu/hr) (EU-1 and EU-2);
      (B) Fuel consumption rate (EU-1 and EU-2);
      (C) Air discharge flowrate (dry standard cubic feet);
      (D) Exhaust temperature of emissions out the stack (EU-1 and EU-2);
      (E) Unit load on an hourly basis (EU-1);
   (6) Date analytical analyses (if any) were performed;
   (7) Entity that performed the analyses;
   (8) Analytical techniques or methods used;
   (9) Results of such analyses;
   (10) Compliance status of each monitored requirement as described in Section V and VII of this permit; and
   (11) Description of corrective action taken in response to permit deviations and when action was initiated.

(d) Periodic Monitoring and Emissions Records
   (1) Date and time of parameter observation or emission calculation;
   (2) Name of parameter observed or emission calculated;
   (3) Observed parameter value or calculated emission value with appropriate units; and
   (4) Periods that data was unavailable.
(e)  Excess Emissions and Upset Conditions
    (1)  Date and time of excess emission or upset condition occurred;
    (2)  Nature of the excess emission or upset condition and an identification of the affected unit,
         process, or activity; and
    (3)  Description of corrective action taken in response to a discovered permit deviation, excess
         emission, upset condition, or malfunction, as applicable.

(f)  Maintenance Activities
    (1)  Date and time of the maintenance activity;
    (2)  Name of the person who performed the maintenance;
    (3)  Identification of the unit or activity being maintained; and
    (4)  Description of the maintenance being conducted.

40 CFR 75.57 - 75.59
WAC 173-401-615(2)

K2.  Continuous Emission Data Recordkeeping  ADP 10-2929, Conditions 26 & 27
The permittee shall maintain a file for the Combustion Turbine containing the measurements, data, reports,
and general information identified below. The file shall be maintained at the source in a readily accessible
form suitable for inspection for at least five (5) years from the date of each record.

(a)  General Records
    The file shall include the following information for the Combustion Turbine:
    (1)  The data and information required in (b) through (f) of 40 CFR 75.54;
    (2)  The supporting data and information used to calculate values required in paragraphs (b) through
         (f) of 40 CFR 75.54;
    (3)  The certification test data and information required in 40 CFR 75.56 for tests required under
         40 CFR 75.20, beginning with the date of the first certification test performed, and the quality
         assurance and quality control data and information required in 40 CFR 75.56 for tests and the
         quality assurance/quality control plan required under 40 CFR 75.21 and Appendix B of 40
         CFR 75, beginning with the date of provisional certification;
    (4)  The current monitoring plan as described in 40 CFR 75.53; and
    (5)  The quality control plan as described in 40 CFR 75, Appendix B.
    (6)  Percent monitoring system data availability, (recorded to the nearest tenth of a percent),
         calculated pursuant to 40 CFR 75.32.

(b)  Operating Parameter and Emission Records
    The file shall include the following information for each hour of unit operating time for the
    Combustion Turbine:
    (1)  Date and hour;
    (2)  Actual operating time (rounded up to nearest 15 minutes);
    (3)  Total gross turbine load (rounded to nearest MW); and
    (4)  Total turbine heat input (million Btu); and
    (5)  Combustion Turbine fuel consumption (MMBtu/hr).
    (6)  Average NOx concentration (ppmv @ 15%O2);
    (7)  Average NOx emission rate (lb/million Btu and lb/hr);
    (8)  Average CO concentration (ppmv @ 15%O2);
    (9)  Average CO emission rate (lb/hr);
(10) Average SO₂ emission rate (lb/hr);  
(11) Average O₂ concentration (% O₂);  
(12) Average NH₃ emission rate (lb/hr); and  
(13) Average NH₃ consumption in control system (lb/hr).

IX. REPORTING TERMS AND CONDITIONS
All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. Where a reporting schedule is specified (e.g. quarterly, semi-annual, or annual), compliance with the reporting frequency is met when reports are submitted more frequently than required.

Reports shall be submitted to the following addresses, unless otherwise instructed:

Control Officer U.S. EPA Region X
Southwest Clean Air Agency Air Operating Permits
11815 NE 99 Street, Suite 1294 1200 Sixth Avenue, AWT-107
Vancouver, WA 98682 Seattle, WA 98101

40 CFR 60.7(b)  
WAC 173-401-615(3)(b)  
SWCAA 400-107, SWCAA 400-115

R1. Deviations from Permit Conditions ADP 10-2929, Conditions 39, 40 & 43
The permittee shall report deviations from permit conditions no later than thirty days after the end of the month during which the deviation is discovered. Deviations that represent a potential threat to human health or safety shall be reported as soon as possible but no later than twelve hours after the deviation is discovered. Excess emissions shall be reported as soon as possible. In accordance with SWCAA 400-107(1), excess emissions that the permittee wishes to be considered unavoidable must be reported as soon as possible, but no later than 48 hours after discovery.

All deviation reports shall be submitted in writing (e.g. e-mail, facsimile or letter). Each report shall include the following information:

(a) Identification of the emission unit(s) involved;
(b) Duration of the event including the beginning and end times; and
(c) Description of the event, including:
   (1) Whether or not the deviation was due to an upset condition,
   (2) Probable cause of the deviations, and
   (3) Description of corrective action taken in response to the event (if any).
**R2. Complaint Reports**

The permittee shall report all air pollution related complaints to SWCAA within 3 business days of receipt. Complaint reports shall include the following information:

(a) Date and time of the complaint;
(b) Name of the complainant;
(c) Nature of the complaint; and
(d) Description of action taken in response to complaint (if any).

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**R3. Quarterly Reports**

**General Information**

The permittee shall submit quarterly reports to SWCAA no later than 30 days after the end of each quarter of the calendar year. Each report must be certified by a responsible official consistent with WAC 173-401-520. Each report shall contain, at a minimum, the following information:

(a) Records of all required monitoring and inspections as described in requirements M1 thru M4 of this permit. A copy of the relevant opacity certification(s) shall be submitted with the report for all EPA Method 9 and/or SWCAA Method 9 monitoring conducted during the reporting period;
(b) A summary of all deviations from permit conditions that occurred during the reporting period;
(c) Monthly hours of operation for all emission units;
(d) Monthly fuel consumption for Fuel Gas Heater;
(e) Hourly fuel consumption and power output for Combustion Turbine/HRSG;
(f) Hourly ammonia consumption for Combustion Turbine/HRSG operation;
(g) Hourly and daily (24-hr) CEMS/DAHS values for each data element identified in Section K2.(b) of this permit;
(h) Results of any/all CEMS calibrations and cylinder gas audits conducted during the quarter.
(i) Identification of any periods during which required CEMS data is not available and an explanation of why the data is missing;
(j) Excess emissions and monitor downtime in accordance with 40 CFR 60.7(c) pursuant to 40 CFR 60.4375;
(k) Information required under applicable provisions of 40 CFR 75;
(l) Summary of startup and shutdown events for Combustion Turbine/HRSG during the reporting period; and
(m) Summary of facilitywide air pollutant emissions for each month of the reporting period, total emissions for the reporting period, and total emissions for the preceding 12-month period.
Acid Rain Data
The permittee's designated representative shall electronically report the data and information identified below in accordance with 40 CFR 75.64 and 75.65. Each electronic report must be submitted to the EPA Administrator within 30 days following the end of each calendar quarter and shall include:

(n) The information and hourly data required in 40 CFR 75.64 and 75.65, excluding the descriptions of adjustments, corrective action, and maintenance, and excluding any information which is incompatible with electronic reporting (e.g., field data sheets, lab analyses, quality control plan, etc.),

(o) Tons (rounded to the nearest tenth) of SO2 emitted during the quarter and cumulative SO2 emissions for the calendar year,

(p) Tons of CO2 emitted during the quarter and cumulative CO2 emissions for the calendar year, and

(q) Total heat input (million Btu) for the quarter and cumulative heat input for the calendar year;

40 CFR 63.6650(f)

R4. Semi-Annual Reports
WAC 173-401-615(3)
Consistent with WAC 173-401-615(3) the permittee shall submit to SWCAA by September 15th and March 15th for the six month periods January through June and July through December respectively, a report on the status of all monitoring requirements. All instances of deviation from permit requirements shall be clearly identified. If no deviations occurred, then a statement to that effect shall be submitted.

The semi-annual report shall contain a certification of all reports previously submitted during the semi-annual period that have not already been certified. The certification shall be consistent with WAC 173-401-520. For all EPA Method 9 or SWCAA Method 9 monitoring conducted during the semi-annual period, a copy of the relevant opacity certification(s) shall be submitted with the semi-annual report.

Separate semi-annual reports are not necessary if the permittee elects to provide the above information and certification as part of each quarterly report.

SWCAA 400-105

R5. Emission Inventory Reports
ADP 10-2929, Condition 38
The permittee shall submit an inventory of annual emissions for each calendar year to SWCAA by March 15th of the following year in accordance with SWCAA 400-105, unless an alternate date is approved by SWCAA. The inventory shall include stack and fugitive emissions of NOx, SO2, CO, VOC, PM, and TAPs. TAP emissions shall be calculated consistent with the emission factors and methodology presented in the Technical Support Document for ADP 10-2929. The inventory shall include stack and fugitive emissions of NOx, SO2, CO, VOC, PM, PM10, PM2.5, hazardous air pollutants, and toxic air pollutants as defined in WAC 173-460 (effective 8/21/98).
40 CFR 72.90, 40 CFR 75.60

R6. Annual Compliance Certification

The permittee shall submit to SWCAA and EPA a certification of compliance with all terms and conditions of this permit in accordance with WAC 173-401-630(5)(d). The permittee shall submit the following information by March 15th for the previous calendar year:

(a) Identification of each term or condition of the permit that is the basis of the certification;
(b) Statement of compliance status;
(c) Whether compliance was continuous or intermittent;
(d) Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615;
(e) Such other facts as SWCAA may require to determine the compliance status of the source; and
(f) Such additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the FCAA.

R7. Fuel Sulfur Content Reports

ADP 10-2929, Condition 44

The permittee shall report the results of fuel sulfur sampling to SWCAA within 45 days of test completion. Each test report shall include:

(a) Time and date of the fuel sulfur sampling;
(b) A summary of sampling results. Fuel sulfur content results shall, at a minimum, be reported in units of gr/100 scf and lb/MMBtu;
(c) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation;
(d) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
(e) Chain of custody information; and
(f) Discussion of any abnormalities associated with the results.

R8. Emission Test Reports

ADP 10-2929, Condition 44 and Appendices A, B and E

The permittee shall do the following for each emission test conducted pursuant to Appendices A, B and C of this permit:

(a) Submit a comprehensive test plan to SWCAA for review and approval at least 10 business days prior to emission testing;
(b) Notify SWCAA at least 5 business days in advance of emission testing so that SWCAA personnel may be present during testing;
(c) Report a summary of operating conditions for each test run as specified in applicable sections of Appendices A, B and C of this permit;
(d) Report required test results to SWCAA within 45 days of test completion as specified in applicable sections of Appendices A, B and C of this permit. Emissions data shall be corrected to units that correspond to the applicable standard.
WAC 173-401-615(3)

R9. Emission Monitoring Reports ADP 10-2929, Condition 44 and Appendix F
The permittee shall report the following information within 45 days of completion for each emission monitoring test conducted pursuant to Appendix D of this permit:
(a) Time and date of the performance monitoring;
(b) Identification of the personnel involved;
(c) A summary of results, reported in units consistent with the applicable emission standard or limit;
(d) A summary of equipment operating conditions;
(e) A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation; and
(f) Analyzer response check documentation.

Reported monitoring results shall be corrected to 3% \( O_2 \) in the exhaust gas and corrected for the analyzer response to zero and span gas.

Combustion Turbine/HRSG
R10. NO\(_x\) Emission Trial Reports ADP 10-2929, Condition 44 and Appendix C
NO\(_x\) emission trial results shall be reported to SWCAA within 45 days of test completion. Each report shall include:
(a) The time and date of the emission trial;
(b) Identification of the personnel conducting the trial;
(c) NO\(_x\) CEM calibration documentation from that day and the most recent cylinder gas audit;
(d) Discussion of any abnormalities associated with the trial results; and
(e) A summary of the following data for each tested operating condition:
   (1) NO\(_x\) concentration corrected to 15% \( O_2 \),
   (2) NH\(_3\) concentration corrected to 15% \( O_2 \),
   (3) Ammonia injection rate (lb/hr),
   (4) Turbine generator load (MW\(_{\text{gross}}\)),
   (5) Temperature of flue gas immediately upstream of the SCR catalyst bed, and
   (6) Temperature of flue gas immediately downstream of the SCR catalyst bed.

R11. General Acid Rain Reports 40 CFR 75.60, 75.61 & 75.63
The designated representative shall comply with all Acid Rain Program reporting requirements in accordance with 40 CFR 75.60 and with the signatory requirements of 40 CFR 72.21.

The permittee or designated representative shall submit written notification to SWCAA and EPA Region X of certification tests, recertification tests, and revised test dates as specified in 40 CFR 75.20 for CEMS in accordance with 40 CFR 75.61. The designated representative shall submit applications and reports in accordance with 40 CFR 75.63.
X. NON-APPLICABLE TERMS AND CONDITIONS
The following lists all federal, state, and/or local requirements that might reasonably apply to the permittee, but are deemed nonapplicable after review by SWCAA. In accordance with WAC 173-401-640, the permittee is provided a permit shield for not complying with the requirements listed below where they have been identified to be non-applicable to specific emission units.

**Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978**

Subpart Da established performance standards electric utility steam generating units that are capable ofcombusting more than 250 MMBtu/hr heat input of fossil fuel and for which construction, modification, or reconstruction commences after September 18, 1978. The HRSG at this facility would physically qualify as an affected facility under this regulation, but pursuant to 40 CFR 60.4305(b) the unit is not subject because it is subject to 40 CFR 60 Subpart KKKK instead.

**Standards of Performance for Stationary Gas Turbines**

Subpart GG establishes performance standards for stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, which commenced construction, modification, or reconstruction after October 3, 1977. The combustion turbine at this facility is of the appropriate size and age to be an affected facility under 40 CFR 60, Subpart GG. However, the combustion turbine is also of the appropriate size and age to be an affected facility under 40 CFR 60, Subpart KKKK. Pursuant to 40 CFR 60.4305(b), any stationary combustion turbine regulated under Subpart KKKK is exempt from the requirements of Subpart GG.

**Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

Subpart III establishes performance standards for applicable to operators of stationary compression ignition (CI) internal combustion engines (ICE) that are manufactured after April 1, 2006 (except a fire pump engine), manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006, or modified/reconstructed after July 11, 2005. This facility has one compression ignition internal combustion engine emission units (Emergency Generator), but the unit was manufactured prior to April 1, 2006, and has not been modified or reconstructed since that time. Therefore, this regulation is not applicable.

**National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers**

Subpart Q establishes performance standards for all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals on or after September 8, 1994. The cooling towers at this facility do not use chromium-based water treatment chemicals, therefore, this requirement is not applicable.
National Emission Standards for Hazardous Air Pollutants 40 CFR 63, Subpart YYYYY

Subpart YYYYY establishes performance standards for any existing, new, or reconstructed combustion turbine located at a facility that is a major source of hazardous air pollutant emissions. This facility is not a major source of hazardous air pollutant emissions, therefore, this requirement is not applicable.

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines Subpart ZZZZZ 40 CFR 63.6650

Portions of 40 CFR 63.6650 infer that semi-annual compliance reports are required for existing emergency CI engines. However, there are no reporting requirements listed as being applicable to these units in Table 7 (which summarized the requirements of the section), and it seems inappropriate to require emergency engines subject to no numeric emission or operating limit to submit semi-annual compliance status reports. Furthermore, EPA's response to comments on the proposed rule indicates that this was not the intent of the rule. In a memorandum dated February 17, 2010 from Melanie King to EPA Docket EPA-HQ-OAR-2008-0708, EPA wrote:

"EPA agrees with the commenter that semi-annual compliance reporting, and other types of reporting required under the General Provisions of 40 CFR part 63 are not appropriate for area sources that are not subject to numerical emission standards. EPA believes that recording information and maintaining records will provide EPA with assurance that facilities are meeting the work/management practices and other requirements applicable to their existing stationary engines. Further, EPA believes it is appropriate [to] extend the same approach to any sources that are not subject to numerical emission standards, including existing stationary CI engines less than 100 HP and existing stationary emergency CI engines..."

Therefore, emergency engines at this facility are not required to submit semi-annual compliance reports.

Mandatory Greenhouse Gas Reporting (Federal) 40 CFR 98

40 CFR 98 establishes mandatory reporting requirements for greenhouse gas (GHG) emissions from selected stationary source categories in the United States. Pursuant to 40 CFR 89.3, facilities subject to this regulation must submit GHG emissions reports to the Administrator, as specified in paragraphs (a) through (g) of that section, for calendar year 2010 and each subsequent calendar year. This regulation was proposed on April 10, 2009 (74FR16609) and finalized on September 22, 2009. In the preamble of the final promulgation, EPA responded to a question regarding whether the reporting requirements constitute an applicable requirement for the purposes of Title V. The response indicates that they are not.

As currently written, the definition of "applicable requirement" in 40 CFR 70.2 and 71.2 does not include a monitoring rule such as today's action, which is promulgated under CAA sections 114(a)(1) and 208. http://www.epa.gov/climatechange/emissions/ghgrulemaking.html
N8. Compliance Assurance Monitoring
40 CFR 64
40 CFR 64 establishes criteria that define what monitoring should be conducted by a source owner or operator to provide a reasonable assurance there is compliance with emission limits and standards in order to certify compliance under the Title V operating permit program. NO\textsubscript{x} and CO emissions from the Combustion Turbine/HRSG would normally be subject to this regulation. However, the Combustion Turbine/HRSG is subject to the Acid Rain Program requirements for NO\textsubscript{x} and has a continuous compliance determination method for CO (CEMS). Therefore, the permittee is exempt from 40 CFR 64 requirements pursuant to 40 CFR 64.2(b)(1)(iii) and 64.2(b)(1)(vi).

Carbon Dioxide Mitigation for Fossil-Fueled Thermal

WAC 173-407 sections 010 through 080 require new and modified fossil-fueled thermal electric generating facilities to mitigate associated CO\textsubscript{2} emissions. The regulation is intended to implement the provisions of Chapter 80.70 RCW. Pursuant to WAC 173-407-030(3)&(4), Part I requirements are applicable to facilities with station-generating capability of more than twenty-five thousand kilowatts, but less than three hundred fifty thousand kilowatts for which an application for initial approval or qualifying modification is submitted after July 1, 2004. This facility has a station-generating capability of approximately 248 thousand kilowatts, and was originally approved prior to July 1, 2004. Permit renewals and equipment modifications carried out since the original approval have not increased the facility's generating capacity or increased potential CO\textsubscript{2} emissions. Therefore, the actions do not constitute qualifying modifications and the regulation is not applicable at this time.

N10. Source Registration Program SWCAA 400-100
SWCAA 400-100 implements SWCAA’s source registration program. Pursuant to SWCAA 400-100(1)(b) sources subject to the Air Operating Permit program (WAC 173-401) are exempt from the registration program. Therefore, the registration program is not applicable to this facility.

N11. Requirements for Sources in a Maintenance Plan Area SWCAA 400-111
The permittee is not located in a maintenance plan area for any criteria pollutant; therefore, this regulation is not applicable.

N12. Requirements for New Sources in Nonattainment Areas SWCAA 400-112
The permittee is not located in a nonattainment area for any criteria pollutant; therefore, this regulation is not applicable.

N13. Bubble Rules SWCAA 400-120
The permittee has not requested an emission bubble for any regulated pollutant. Therefore, this regulation is not applicable.
N14. Emission Reduction Credits

The cited rule sections govern the creation, maintenance, and use of emission reduction credits within the Agency’s jurisdiction. Conditions for the issuance of credits are detailed in SWCAA 400-131(3). Allowed uses for emission reduction credits are detailed in SWCAA 400-130(2). The permittee has not requested to create or use any emission reduction credits (ERCs). Therefore, this regulation is not applicable.
APPENDIX A
Combustion Turbine/HRSG – Emission Testing Requirements

1. Introduction:
The purpose of this testing is to quantify emissions of NO\textsubscript{X}, CO, NH\textsubscript{3}, PM, and VOCs from the combustion turbine exhaust stack and to demonstrate compliance with the requirements of this Permit and New Source Performance Standards (NSPS) 40 CFR 60 Subpart KKKK "Standards of Performance for Stationary Combustion Turbines".

2. Testing Requirements:
a. Emission testing to quantify emissions of NO\textsubscript{X}, CO, NH\textsubscript{3}, PM, and VOCs from the combustion turbine/HRSG exhaust stack shall be conducted no later than February 2011. Subsequent emission testing shall be conducted annually, no later than the end of February. Individual constituents shall be tested pursuant to the schedule below.

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Test Method or Equivalent</th>
<th>Schedule</th>
<th>Minimum Test Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stack gas velocity</td>
<td>EPA Methods 1 and 2</td>
<td>Annual</td>
<td>N/A</td>
</tr>
<tr>
<td>O\textsubscript{2} and CO\textsubscript{2}</td>
<td>EPA Method 3 or 3A</td>
<td>Annual</td>
<td>N/A</td>
</tr>
<tr>
<td>Moisture</td>
<td>EPA Method 4</td>
<td>Annual</td>
<td>1 hour</td>
</tr>
<tr>
<td>Filterable PM</td>
<td>EPA Method 5</td>
<td>Every 5 years</td>
<td>3 hours (90 dscf)</td>
</tr>
<tr>
<td>NOX</td>
<td>EPA Method 7E</td>
<td>Annual</td>
<td>1 hour</td>
</tr>
<tr>
<td>Opacity</td>
<td>EPA Method 9</td>
<td>Annual</td>
<td>6 minutes</td>
</tr>
<tr>
<td>CO</td>
<td>EPA Method 10</td>
<td>Annual</td>
<td>1 hour</td>
</tr>
<tr>
<td>VOC</td>
<td>EPA Method 18/25A\textsuperscript{2}</td>
<td>Every 5 years</td>
<td>1 hour</td>
</tr>
<tr>
<td>Condensable PM</td>
<td>EPA Method 202</td>
<td>Every 5 years</td>
<td>3 hours (90 dscf)</td>
</tr>
<tr>
<td>Ammonia</td>
<td>BAAQMD Method ST1B</td>
<td>Annual</td>
<td>1 hour</td>
</tr>
</tbody>
</table>

\textsuperscript{1} The use of an alternate/ equivalent test methods must be approved by SWCAA in writing.
\textsuperscript{2} VOC emission rates shall be reported as propane. The use of a "methane cutter" or the subtraction of methane and ethane concentrations as measured by EPA Method 18 is acceptable in determining VOC concentration.

Testing for each constituent shall consist of a minimum of 3 sampling runs of the duration specified above. Relative Accuracy Test Audit (RATA) sampling runs for NO\textsubscript{X} and CO may be used to comply with the annual source testing requirements (i.e. 3 21-minute RATA runs = 1 source test run). All testing shall be conducted at base load with duct burners firing unless otherwise approved by SWCAA.

b. A comprehensive test plan shall be submitted to SWCAA for review and approval at least 10 business days prior to each test.

c. SWCAA personnel shall be notified at least 5 business days prior to each testing campaign so that they may be present during testing.
3. Source Operation:
   a. A complete record of production related parameters including turbine and duct burner firing rates, ammonia addition rate, startups, and shutdowns shall be kept during emissions testing to correlate operations with emissions and shall be recorded in the final report of the test results.
   b. Source operations during the emissions test must be representative of maximum intended operating conditions.

4. Reporting Requirements:
   a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion and, at a minimum, shall contain the following information:
      (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
      (2) Time and date of the test and identification and qualifications of the personnel involved,
      (3) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit,
      (4) Summary of control system or equipment operating conditions,
      (5) Summary of production related parameters,
      (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
      (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
      (8) Copies of field data and example calculations,
      (9) Chain of custody information,
      (10) Calibration documentation,
      (11) Discussion of any abnormalities associated with the results, and
      (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.
   b. All test results for constituent emission concentration shall be corrected to 15% oxygen.
APPENDIX B
Combustion Turbine/HRSG – Continuous Monitoring Requirements

1. Introduction:
The purpose of installing and maintaining a CEMS for NO\textsubscript{X}, O\textsubscript{2}, and CO\textsubscript{2} and a CEMS or PEMS for NH\textsubscript{3} is to demonstrate compliance with the requirements of this Permit, provide the ability to reduce NO\textsubscript{X} emissions while simultaneously minimizing NH\textsubscript{3} ammonia, and comply with the monitoring requirements of 40 CFR 75 - Continuous Emissions Monitoring.

2. Requirements:
   a. NO\textsubscript{X} and O\textsubscript{2}. The continuous monitoring system for the concentration and emission rate of NO\textsubscript{X} and the concentration of O\textsubscript{2} from the exhaust stack of the combustion turbine/HRSG shall be installed and maintained in accordance with the requirements and specifications found in the following regulations:
      • 40 CFR 60 Appendix F.
      • 40 CFR 75.

   The following exceptions apply to the requirements of the above referenced regulations:
      • The quarterly audit specified in 40 CFR 60 Appendix F need not be conducted in any quarter in which the associated combustion turbine operated less than 168 hours.
      • The quarterly audit requirements of 40 CFR 60 Appendix F do not apply to the NO\textsubscript{X} CEMS.
      • The linearity check specified in 40 CFR 75 may be used in lieu of the cylinder gas audit (CGA) detailed in 40 CFR 60 Appendix F for the O\textsubscript{2} CEMS.

   b. CO. The continuous monitoring system for the concentration and emission rate of CO from the exhaust stack of the combustion turbine/HRSG shall be installed and maintained in accordance with the requirements and specifications found in the following regulations:
      • 40 CFR 60 Appendix B, Performance Specification 4A.
      • 40 CFR 60 Appendix F.

   The following exceptions apply to the requirements of the above referenced regulations:
      • The quarterly audit specified in 40 CFR 60, Appendix F need not be conducted in any quarter in which the associated combustion turbine operated less than 168 hours.
      • The criteria for excessive audit inaccuracy in 40 CFR 60 Appendix B, Performance Specification 4a, Section 13.2 is replaced by an RA of no greater than 20% of the average RM value or an absolute average difference between the RM and CEMS of 0.3 ppmv plus the 2.5 percent confidence coefficient.
      • The criteria for excessive audit inaccuracy for cylinder gas audits in 40 CFR 60 Appendix F, Section 5.2.3(2) is replaced by a maximum audit inaccuracy of 1.0 ppm.
c. **NH₃.** The predictive emission monitoring system for the concentration and emission rate of NH₃ from the exhaust stack of the combustion turbine/HRSG shall be installed and operated during power plant operation.

Annually, the permittee shall perform a relative accuracy audit (RAA) of the predictive emission monitoring system. The results of the annual NH₃ compliance test may be used for this purpose. The average of the results from each NH₃ test run shall be compared to the average NH₃ concentration determined by the PEMS during the same time period. The average relative accuracy (RA) of the PEMS shall not exceed 20% of the reference method data or 1.0 ppmvd @ 15% O₂, whichever is less stringent. The relative accuracy during each sampling period shall be determined according to the following equation:

\[
RA = 100 \times \frac{(C_{RM} - C_{PEMS})}{C_{RM}}
\]

Where:
- \( C_{RM} \) = Reference method concentration
- \( C_{PEMS} \) = PEMS calculated concentration

PEMS concentration (\( C_{PEMS} \)) will be calculated using the following formula:

\[
\frac{\left( \frac{NH₃Injection}{17} - \frac{StackFlow \times (SCRNOₓppm - StackNOₓppm)}{29} \times \frac{1000000}{1000000} \right)}{StackFlow} \times CorrectionFactor
\]

Where:
- NH₃Injection = NH₃ injection flow rate (lb/hr) as measured by the installed flow meter
- StackFlow = Stack flow rate (lb/hr) calculated using EPA Method 19 fuel factors and recorded fuel consumption of Combustion Turbine/HRSG
- SCRNOₓppm = SCR inlet concentration of NOₓ (ppmv) as measured by the inlet NOₓ analyzer
- StackNOₓppm = Exhaust stack concentration of NOₓ (ppmv) as measured by the CEMS NOₓ analyzer
- CorrectionFactor = Numerical correction constant validated in most recent RAA*

* Subsequent to successfully passing an RAA, the Permittee may either continue to use the existing correction factor or revise the correction factor based on results of the RAA. If the Permittee chooses to revise the correction factor, the chosen value must ensure compliance with the RA requirements listed above. The revised correction factor shall be applied beginning with the first calendar quarter after the quarter in which the RAA is conducted.

d. **Test Reports.** RATA and RAA results shall be submitted to SWCAA within 45 days of test completion. Test reports shall include all of the information identified in Section 4 of Appendix A of this permit.
APPENDIX C
Fuel Gas Heater – Emission Testing Requirements

1. Introduction:
The purpose of this testing is to quantify emissions from the fuel preheater, and demonstrate compliance with the requirements of this Permit and applicable air quality regulations.

2. Testing Requirements:
a. Test plan. A comprehensive test plan shall be submitted to SWCAA for review and approval at least 10 business days prior to each test. SWCAA personnel shall be informed at least 5 business days prior to testing so that a representative may be present during testing.
b. Testing schedule. An initial emission test shall be conducted at the preheater exhaust stack no later than 90 days after commencing regular operation. Subsequent emission testing shall be conducted every ten years by the end of the calendar month in which the initial emission test was conducted.
c. Test runs/Reference test methods. A minimum of 3 test runs shall be performed for each constituent listed below to ensure the data are representative. Compliance shall be demonstrated by averaging the results of the individual sampling runs. The sampling methods identified below shall be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Reference Test Method</th>
<th>Minimum Test Run Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flow rate, temperature</td>
<td>EPA Methods 1 and 2</td>
<td>N/A</td>
</tr>
<tr>
<td>O₂, CO₂ content</td>
<td>EPA Method 3 or 3A</td>
<td>60 minutes</td>
</tr>
<tr>
<td>Moisture content</td>
<td>EPA Method 4</td>
<td>60 minutes</td>
</tr>
<tr>
<td>NOₓ</td>
<td>EPA Method 7E</td>
<td>60 minutes</td>
</tr>
<tr>
<td>CO</td>
<td>EPA Method 10</td>
<td>60 minutes</td>
</tr>
</tbody>
</table>

3. Source Operation:
a. Source operations. Source operations during the emissions test must be representative of maximum intended operating conditions.
b. Record of production parameters. Production related parameters and equipment operating conditions shall be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters shall, at a minimum, include preheater fuel consumption and process startup/shutdown events that occur during testing. All recorded production parameters shall be documented in the test results report.
4. Reporting Requirements:
   a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion and, at a minimum, shall contain the following information:

   (1) Description of the source including manufacturer, model number and design capacity of the equipment, and the location of the sample ports or test locations,
   (2) Time and date of the test and identification and qualifications of the personnel involved,
   (3) Summary of results, reported in units and averaging periods consistent with the application emissions standard or unit,
   (4) Summary of control system or equipment operating conditions,
   (5) Summary of production related parameters,
   (6) A description of the test methods or procedures used including all field data, quality assurance/quality control procedures and documentation,
   (7) A description of the analytical procedures used including all laboratory data, quality assurance/quality control procedures and documentation,
   (8) Copies of field data and example calculations,
   (9) Chain of custody information,
   (10) Calibration documentation,
   (11) Discussion of any abnormalities associated with the results, and
   (12) A statement signed by the senior management official of the testing firm certifying the validity of the source test report.

   b. All test results shall be corrected to 3% oxygen.
APPENDIX D
Fuel Gas Heater – Emission Monitoring Requirements

1. Introduction:
   a. The purpose of periodically monitoring the fuel preheater exhaust streams is to minimize emissions and provide a reasonable assurance that the preheater is operating properly.

   b. Periodic monitoring may be conducted with an electrochemical cell combustion analyzer, analyzers used for reference method testing, or other analyzers pre-approved by SWCAA.

2. Monitoring Procedure:
   a. Monitoring of preheater exhaust gases to determine emission concentrations of the following constituents shall be conducted within 12 months of the initial emission test performed in accordance with Appendix C of this permit. Subsequent emission monitoring shall be conducted on a 12 month cycle, no later than the end of the calendar month in which the initial emission monitoring was performed. Emission monitoring is not required during any year in which emission testing is performed pursuant to Appendix C of this permit.

   Constituents to be Measured
   Carbon Monoxide (CO)
   Nitrogen Oxides (NOx)
   Oxygen (O2)

   b. Source operation during testing must be representative of maximum intended operating conditions during that year.

   c. Alternative testing methodologies must be pre-approved by SWCAA.

3. Minimum Quality Assurance/Quality Control Measures:
   a. The analyzer(s) response to span gas of a known concentration shall be determined before and after testing. No more than 12 hours may elapse between span gas response checks. The results of the analyzer response shall not be valid if the difference between the pre and post response check results vary by more than 10% of the initial span gas value.

   b. The CO and NOx span gas concentrations shall be no less than 50% and no more than 200% of the emission concentration corresponding to the permitted emission limit. A lower concentration span gas may be used if it is more representative of measured concentrations. Ambient air may be used to zero the CO and NOx cells/analyzer(s) and span the oxygen cell/analyzer.

   c. Sampling shall consist of at least 1 test consisting of at least 5 minutes of data collection following a "ramp-up phase." The "ramp-up phase" ends when analyzer readings have stabilized (less than 5% per minute change in emission concentration). Emission concentrations shall be recorded at least once every 30 seconds during the data collection phase. All test data collected following the ramp-up phase(s) shall be reported to SWCAA. A sample data sheet is attached for reference.
3. Minimum Quality Assurance/Quality Control Measures (continued):
   If the monitoring results from any monitoring event indicate that emission concentrations exceed applicable permit limits, the permittee shall either perform 60 minutes of additional monitoring to more accurately quantify CO and NOx emissions, or initiate corrective action. Additional monitoring or corrective action shall be initiated as soon as practical but no later than three days after the exceedance is identified. Corrective action includes tuning, maintenance by service personnel, limitation of unit load, or other action taken to maintain compliance with permitted limits. Monitoring of unit emissions must be conducted within three days following completion of any corrective action to confirm that the corrective action has been effective. Initiation of corrective action does not shield the permittee from enforcement.

4. Reporting:
   a. All monitoring results shall be recorded at the facility and reported to SWCAA in writing within 45 calendar days of completion. The following information shall be included in the report:
      
      (1) Time and date of the performance monitoring;
      (2) Identification of the personnel involved;
      (3) A summary of results, reported in units consistent with the applicable emission standard or limit;
      (4) A summary of equipment operating conditions;
      (5) A description of the evaluation methods or procedures used including all field data, quality assurance/quality control procedures and documentation; and
      (6) Analyzer response check documentation.

   b. Reported monitoring results shall be corrected to 3% O2 in the exhaust gas and corrected for the analyzer response to zero and span gas.
APPENDIX E

Acid Rain Permit No. SW-ARP-3-R0

Issued to: Mint Farm Generating Station
Operated by: Puget Sound Energy
Address: 1200 Prudential Boulevard
           Longview, WA  98632
ORIS code: 55700
Affected unit: Combustion Turbine/HRSG (CTG1)

Effective Date: This Acid Rain permit will become effective concurrent with the issuance of the initial Title V permit for the Mint Farm Generating Station (SW08-15-R0). The Acid Rain permit shall have a permit term of 5 years from the above effective date.

Acid Rain Permit Contents

1) Statement of Basis.
2) Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process, and any additional requirements or conditions as per WAC 173-406-501, Acid Rain Permit Contents.
3) SO₂ allowances allocated under this permit and NOₓ requirements for each affected unit.
4) Standard Requirements. The owners and operators of each affected unit must comply with the standard requirements and special provisions set forth in the permit application, this permit and WAC 173-406-106 "Standard Requirements".
5) Permit Application.

1) Statement of Basis
Statutory and Regulatory Authorities: In accordance with Washington Administrative Code (WAC) 173-406 "Acid Rain Regulation" and WAC 173-401 "Operating Permit Regulation," the Southwest Clean Air Agency issues this permit pursuant to WAC 173-406 and WAC 173-401. WAC 173-406 is based on the provisions of Title 40 Code of Federal Regulations (CFR) parts 72-76, which is part of the requirements established pursuant to Title IV of the Clean Air Act, 40 U.S.C. 7401, et seq., as amended by Public Law 101-549 (November 15, 1990).

2) Comments, Notes and Justifications
This Acid Rain Permit is deemed to incorporate the definition of terms under WAC 173-406-101 unless otherwise expressly defined in this permit.
3) **SO₂ Allowance Allocations and NOₓ Requirements**

<table>
<thead>
<tr>
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<td>SO₂ Allowances</td>
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<td>TBD(^a,b)</td>
<td>TBD(^a,b)</td>
<td>TBD(^a,b)</td>
<td>TBD(^a,b)</td>
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<tr>
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**Table Footnotes**

\(^a\) Pursuant to 40 CFR 72.9(c)(i) and WAC 173-406-106(3)(a)(i) this unit is required to hold SO₂ allowances, as of the allowance transfer deadline, in the unit's compliance subaccount not less than the total annual emissions of sulfur dioxide from the unit for the previous calendar year.

\(^b\) This acid rain permit shall not be construed to exempt or exclude an affected unit from compliance with any other provisions of the Clean Air Act consistent with 40 CFR 72.9(h) and WAC 173-406-106(8). An SO₂ emission limitation has been established for the Combustion Turbine in ADP 10-2929, and is included as an applicable requirement in the Air Operating Permit for the Mint Farm Generating Station.

\(^c\) Since this unit is not a coal fired unit, there are no applicable acid rain NOₓ emission limits and a Phase II NOₓ permit application is not required. A NOₓ emission limitation has been established for the Combustion Turbine in ADP 10-2929, and is included as an applicable requirement in the Air Operating Permit for the Mint Farm Generating Station.

4) **Standard Requirements**

**Permit Requirements**

1. The designated representative of the Mint Farm Generating Station and each affected unit at the Mint Farm Generating Station shall:
   - Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30 and WAC 173-406-301; and
   - Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit.

2. The owners or operators of the Mint Farm Generating Station and each affected unit at the Mint Farm Generating Station shall:
   - Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
   - Have an Acid Rain permit.

**Monitoring Requirements**

1. The owners and operators and, to the extent applicable, designated representative of the Mint Farm Generating Station and each affected unit at the Mint Farm Generating Station shall comply with the monitoring requirements as provided in 40 CFR part 75.

2. The emissions measurements recorded and reported in accordance with 40 CFR Part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain program.
(3) The requirements of 40 CFR Part 75 shall not affect the responsibility of the owners and operator to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act, applicable requirements of Title 173 WAC, and other provisions of the operating permit for the Mint Farm Generating Station.

Sulfur Dioxide Requirements

(1) The owners and operator of the Mint Farm Generating Station and each affected unit at the River Road Generating plant shall:

(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected unit; and

(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:

(i) Starting January 1, 2000, an affected unit under WAC 173-406-103(1)(b); or

(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under WAC 173-406-103(1)(c).

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7, 40 CFR 72.8, WAC 174-406-104, or WAC 173-406-105 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such an authorization.

(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements
The owners and operators of the Mint Farm Generating Station and each affected unit at the Mint Farm Generating Station shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR Part 77.

(2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:

(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and

(ii) Comply with the terms of an approved offset plan, as required by 40 CFR Part 77.
Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the Mint Farm Generating Station and each affected unit at the Mint Farm Generating Station shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:

(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certification of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply;

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and

(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of the Mint Farm Generating Station and each affected unit at the Mint Farm Generating Station shall submit the reports required under the Acid Rain Program, including those under 40 CFR part 72 and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7, 40 CFR 72.8, WAC 173-406-104, or WAC 173-406-105, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act and by the permitting authority pursuant to Revised Code of Washington (RCW) 70.94.430, RCW 70.94.431 and RCW 70.94.435.

(2) Any person who knowingly makes any false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001 and by the permitting authority pursuant to RCW 70.94.430.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) The Mint Farm Generating Station and each affected unit at the Mint Farm Generating Station shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to the Mint Farm Generating Station (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of the Mint Farm Generating Station and to the affected units at the Mint Farm Generating Station.

(6) Any provision of the Acid Rain Program that applies to an affected unit at the Mint Farm Generating Station (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
Each violation of a provision of WAC 173-406-100 through 173-406-950 and 40 CFR parts 72, 73, 75, 76, 77, and 78, and regulations implementing section 410 of the Act by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities
No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affect unit from compliance with any other provision of the Act, including the provisions of Title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any state law regulating electric utility rates and charges, affecting any state law regarding such state regulation, or limiting such state regulation, including any prudence review requirements under such state law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or

(5) Interfering with or impairing any program for competitive bidding for power supply in a state in which such program is established.

5) Permit Application
A permit application for the Combustion Turbine/HRSG (Unit ID #1) was received by SWCAA on September 19, 2008. The signature date on the permit application was also September 19, 2008. A copy of the permit application is included below. The name of the facility was changed from Mint Farm Energy Center to Mint Farm Generating Station since submission of the application.
**Acid Rain Permit Application**

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: * new  * revised  **X** for Acid Rain permit renewal

**STEP 1**

Identify the facility name, State, and plant (CRIS) code.

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<tr>
<th>Facility (Source) Name</th>
<th>NA</th>
<th>Plant Code</th>
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<tr>
<td>Mint Farm Energy Center, LLC</td>
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**STEP 2**

Enter the unit ID# for every affected unit at the affected source in column "a."

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<thead>
<tr>
<th>Unit ID#</th>
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<th>Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)</th>
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<tbody>
<tr>
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<td>Yes</td>
<td>Yes</td>
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EPA Form 5420-18 (rev. 07-06)
Permit Requirements

STEP 3

(1) The designated representative of each affected source and each affected unit at the source shall:
   (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
   (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:
   (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
   (ii) Have an Acid Rain Permit.

Monitoring Requirements

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

(1) The owners and operators of each source and each affected unit at the source shall:
   (i) Hold allowances, as of the allowance transfer deadline, in the source’s compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
   (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
   (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
   (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
Sulfur Dioxide Requirements, Cont’d.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
   (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
   (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
   (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
Recordkeeping and Reporting Requirements, Cont’d.

STEP 3, Cont’d.

(ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
(iii) Copies of all reports, compliance certificates, and other submissions and all records made or required under the Acid Rain Program; and,
(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating
Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;
(2) Limiting the number of allowances a source can hold; provided, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name: Scott Magie, Project Director
Signature: [Signature]
Date: 9/19/08