

April 3, 2019

Terry Toland, Energy Resources Manager
Clark Public Utilities
PO Box 8900
Vancouver, Washington 98668

Re: Final Title V Renewal Permit for Clark PU – River Road Generating Plant

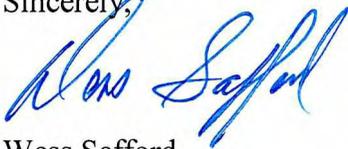
Dear Mr. Toland:

The Southwest Clean Air Agency (SWCAA) is issuing final Air Operating Permit SW99-9-R3 to Clark Public Utilities - River Road Generating Plant. The permit is a renewal permit.

A copy of the final Air Operating Permit and associated Basis Statement accompany this letter. Electronic copies of each document will also 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,



Wess Safford
Air Quality Engineer

Enclosures



**Clark Public Utilities
River Road Generating Plant**

**Air Operating Permit
SW99-9-R3**

Issued: April 3, 2019

Southwest Clean Air Agency
11815 NE 99 Street, Suite 1294
Vancouver, WA 98682-2322
Telephone: (360) 574-3058

AIR OPERATING PERMIT #: SW99-9-R3

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

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

NATURE OF BUSINESS: Electric Energy Generation

SIC / NAICS CODE: 4911 / 221112

AIRS NUMBER: 53-011-00150

ACID RAIN PROGRAM IDENTIFICATION

PLANT NAME: River Road Generating Plant
ORIS CODE: 07605
UNIT DESIGNATIONS: Turbine (Unit 1)

EFFECTIVE DATE: April 3, 2019

EXPIRATION DATE: April 3, 2024

RENEWAL APPLICATION DUE: April 3, 2023

PERMIT ENGINEER:

Wess Safford
Wess Safford, Air Quality Engineer

4/3/19
Date

REVIEWED BY:

Paul T. Mairose
Paul T. Mairose, Chief Engineer

4/3/19
Date



APPROVED BY:

Uri Papish
Uri Papish, Executive Director

4/3/19
Date

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I. ABBREVIATIONS

List of Common Abbreviations

ADP	Air Discharge Permit
AOP	Air Operating Permit
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
CO	Carbon monoxide
EPA	U.S. Environmental Protection Agency
EU	Emission unit
EU#	Refers to a specific emission unit numbered "#"
FCAA	Federal Clean Air Act
G#	Refers to a specific general term or condition numbered "#"
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant
IEU	Insignificant emission unit
IEU#	Refers to an insignificant emission unit numbered "#"
K#	Refers to a specific recordkeeping term or condition numbered "#"
M#	Refers to a specific monitoring term or condition numbered "#"
MMBtu	Million British thermal units
MSDS	Material safety data sheet
MW	Megawatts
N#	Refers to a specific nonapplicable requirement numbered "#"
NH ₃	Ammonia
NO _x	Oxides of nitrogen
NSR	New Source Review
O ₂	Oxygen
P#	Refers to a specific permit provision numbered "#"
PM	Particulate matter
PM ₁₀	Particulate matter less than 10 microns in diameter
PM _{2.5}	Particulate matter less than 2.5 microns in diameter
ppmvd	Parts per million by volume, dry
PTE	Potential to emit
R#	Refers to a specific reporting term or condition numbered "#"
RACT	Reasonably available control technology
RCW	Revised Code of Washington
Req-#	Refers to a specific applicable requirement numbered "#"
SO ₂	Sulfur dioxide
SIP	State implementation plan
SWCAA	Southwest Clean Air Agency
TAP	Toxic air pollutant
tpy	Tons per year
VOC	Volatile organic compound
WAC	Washington Administrative Code

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), hereafter referred to as the "Permit", is authorized under the procedures established in WAC 173-401 and Title V of the Federal Clean Air Act (FCAA). 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, "term", "condition", "standard", and "requirement" have the same meaning as "applicable requirement" specified under 40 Code of Federal Regulations (CFR) 70.2 and WAC 173-401-200.

The Permit is intended to contain a comprehensive list of the local, state, and federal air pollution regulations and standards applicable to the Permittee's facility and to assure and provide for certification of compliance with those requirements. Sections V through IX describe the applicable requirements and cite the originating local, state, or federal regulation or requirement. Federal requirements may be direct (e.g., FCAA or CFR citation) or established under the Washington State Implementation Plan (SIP). Each citation in the table also includes one or two effective dates of the cited regulation. Where there are two dates for the same regulatory citation, the underlying requirement is substantially the same, but the date of the regulation used for enforcement purposes would be different (e.g., federally enforceable versus SWCAA enforceable).

SWCAA is the primary authority for enforcement of all requirements listed in the Permit (federal, state, and local). However, EPA and private citizens may also take enforcement actions under the Permit for those requirements that are federally enforceable; federal regulations, regulations that have a SIP date, and terms of ADPs are federally enforceable. Rules, regulations, and permits that are not SIP approved or federally promulgated are not federally enforceable.

The following table lists the title and effective dates of regulations applicable to the facility:

<u>Regulation/Permit</u>	<u>SIP/Federal Effective Date</u>	<u>State/Local Effective Date</u>	<u>Notes / Exceptions</u>
<i>Federal Regulations</i>			
40 CFR 51	7/1/2018	--	Not Delegated
40 CFR 52	7/1/2018	--	Not Delegated
40 CFR 60 Subpart A	7/1/2018	7/1/2015	Delegated
40 CFR 60 Subpart Db	7/1/2018	7/1/2015	Delegated
40 CFR 60 Subpart GG	7/1/2018	7/1/2015	Delegated
40 CFR 63 Subpart A	7/1/2018	7/1/2015	Delegated
40 CFR 63 Subpart ZZZZ	7/1/2018	7/1/2015	Delegated (Title V Sources Only)
40 CFR 63 Subpart JJJJJ	7/1/2018	7/1/2015	Delegated (Title V Sources Only)
40 CFR 68	7/1/2018	--	Not Delegated
40 CFR 72	7/1/2018	--	Not Delegated
40 CFR 75	7/1/2018	--	Not Delegated
40 CFR 82 Subpart F	7/1/2018	--	Not Delegated

<u>Regulation/Permit</u>	<u>SIP/Federal Effective Date</u>	<u>State/Local Effective Date</u>	<u>Notes / Exceptions</u>
<i>State Regulations</i>			
WAC 173-400-117	7/1/2016	7/1/2016	
WAC 173-400-171	7/1/2016	7/1/2016	
WAC 173-400-700	4/1/2011	7/1/2016	
WAC 173-401	--	3/5/2016	
WAC 173-406	--	12/24/1994	
WAC 173-407	--	7/20/2008	
WAC 173-441	--	3/1/2015	
WAC 173-476	7/1/2016	7/1/2016	
<i>Local Regulations</i>			
WAC 173-460	--	8/21/1998	Local version of previous state rule.
SWCAA 400-030	10/9/2016	6/18/2017	SIP approval excludes Sections (21) and (129)
SWCAA 400-036	10/9/2016	6/18/2017	
SWCAA 400-040	10/9/2016	6/18/2017	SIP approval excludes Sections (1)(c), (1)(d), (2), and (4)
SWCAA 400-050	10/9/2016	6/18/2017	SIP approval excludes Sections (3), (5) and (6)
SWCAA 400-060	10/9/2016	6/18/2017	
SWCAA 400-070	10/9/2016	6/18/2017	SIP approval excludes Sections (2)(a), (3)(b), (5), (6), (7), (8)(c), (9), (10), (11), (12), (14) and (15)(c)
SWCAA 400-072	10/9/2016	6/18/2017	SIP approval excludes Sections (5)(a)(ii)(B), (5)(d)(ii)(B), (5)(d)(iii)(A), (5)(d)(iii)(B)
SWCAA 400-075	--	6/18/2017	
SWCAA 400-076	--	6/18/2017	
SWCAA 400-081	10/9/2016	6/18/2017	
SWCAA 400-091	10/9/2016	6/18/2017	
SWCAA 400-100	--	6/18/2017	
SWCAA 400-101	--	6/18/2017	
SWCAA 400-103	--	6/18/2017	
SWCAA 400-105	10/9/2016	6/18/2017	
SWCAA 400-106	10/9/2016	6/18/2017	SIP approval excludes remainder of rule sections
Sections (1)(a), (1)(b), (1)(c)			
SWCAA 400-107	9/21/1995	6/18/2017	
SWCAA 400-109	10/9/2016	6/18/2017	SIP approval excludes Sections (3)(d), (3)(e)(ii) and (4)
SWCAA 400-110	10/9/2016	6/18/2017	SIP approval excludes Section (1)(d)
SWCAA 400-111	10/9/2016	6/18/2017	SIP approval excludes Section (7)
SWCAA 400-113	10/9/2016	6/18/2017	SIP approval excludes Section (5)

<u>Regulation/Permit</u>	<u>SIP/Federal Effective Date</u>	<u>State/Local Effective Date</u>	<u>Notes / Exceptions</u>
SWCAA 400-114	10/9/2016	6/18/2017	
SWCAA 400-115	--	6/18/2017	
SWCAA 400-116	10/9/2016	6/18/2017	
SWCAA 400-120	--	6/18/2017	
SWCAA 400-130	10/9/2016	6/18/2017	
SWCAA 400-131	10/9/2016	6/18/2017	
SWCAA 400-136	10/9/2016	6/18/2017	
SWCAA 400-151	10/9/2016	6/18/2017	
SWCAA 400-161	10/9/2016	6/18/2017	
SWCAA 400-171	10/9/2016	6/18/2017	SIP approval excludes Section (2)(a)(xii)
SWCAA 400-200	10/9/2016	6/18/2017	
SWCAA 400-205	10/9/2016	6/18/2017	
SWCAA 400-270	10/9/2016	6/18/2017	
SWCAA 425	--	6/18/2017	
SWCAA 476	--	7/14/2018	
SWCAA 400, Appendix A	10/9/2016	6/18/2017	

Air Discharge Permits

SWCAA ADP 95-1800R5	--	4/28/04	
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III. EMISSIONS UNIT IDENTIFICATION

<u>ID No.</u>	<u>Unit Name</u>	<u>Unit Description</u>
EU1	Combustion Turbine	One General Electric model 7A1PFA28-1 natural gas fired combustion turbine (serial #296845) configured with inlet fogging. The combustion turbine is designed to produce approximately 179 MW of electrical power. The combustion turbine operates in conjunction with an unfired heat recovery steam generator (HRSG) that drives a steam turbine. The steam turbine is designed to produce approximately 69 MW of electrical power. Emissions from the combustion turbine consist of NO _x , CO, SO ₂ , PM, VOC, NH ₃ , HAPs, and TAPs. Emissions of nitrogen oxides (NO _x) and carbon monoxide (CO) from the combustion turbine are controlled by a selective catalytic reduction (SCR) system and an oxidation catalyst, respectively.
EU2	Startup Boiler	One Nebraska Boiler model NS-E-76SH (serial number D-3570) natural gas fired boiler rated at 70,000 pounds of steam per hour. The startup boiler has a nominal heat input rating of 103.5 million British thermal units per hour (MMBtu/hr). Emissions from the startup boiler consist of NO _x , CO, SO ₂ , PM, VOC, and TAPs.

<u>ID No.</u>	<u>Unit Name</u>	<u>Unit Description</u>
EU3	Fuel Gas Heater	One GasTech Engineering Corporation natural gas fired glycol heater (serial #D-2055). The gas heater is equipped with low-NO _x burners rated at 2.5 MMBtu/hr. Emissions from the gas heater consist of NO _x , CO, SO ₂ , PM, and VOC.
EU4	Emergency Generator	One diesel engine emergency electric generator rated at 350 kW. The generator is powered by a Detroit Diesel model 8V92TA engine (serial #378162) rated at 568 brake horsepower and manufactured in 1996. Emissions from the diesel-fired emergency electric generator consist of NO _x , CO, SO ₂ , PM, and VOC.
EU5	Emergency Fire Pump	One emergency fire pump. The fire pump is powered by a Detroit Diesel (Perkins) model PDFD-L6YT2504 diesel engine (serial #U630355B) rated at 110 brake horsepower and manufactured in 1996. Emissions from the emergency fire pump consist of NO _x , CO, SO ₂ , PM and VOC.

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

WAC 173-401-610

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

WAC 173-401-500(5)

WAC 173-401-620(2)(e)

P4. Confidentiality of Records and Information

SWCAA 400-270

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.

WAC 173-401-620(2)

SWCAA 400-103

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.

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) Any terms and conditions included in this permit that are not required under the FCAA or under any of its applicable requirements are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the EPA and affected states review requirements of WAC 173-401-700 through WAC 173-401-820. Terms that are SWCAA enforceable only are marked as "local only".

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.

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 173-401-705(2)**
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. Changes Not Requiring Permit Revision / Off Permit Changes **WAC 173-401-722**
WAC 173-401-724

The Permittee may make changes as described in WAC 173-401-722 and WAC 173-401-724 without revising this Permit, provided that the changes satisfy the criteria set forth in those sections, including the requirements to notify SWCAA and EPA. Changes made by the Permittee under WAC 173-401-724 do not qualify for a permit shield.

P13. Excess Emissions **SWCAA 400-107**

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. This provision does not apply to federal standards.

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 **WAC 173-401-630(2)** **SWCAA 400-105(2) & (3)**

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 **WAC 173-401-510(2)(h)(iii)** **WAC 173-401-630(3)**

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 **WAC 173-401-710(1)**

The permittee shall submit a complete permit renewal application to SWCAA no later than the date established in the permit.

This permit expires on April 3, 2024. A renewal application is due on April 3, 2023. A complete renewal application is due no later than October 3, 2023.

G6. Transfer of Ownership or Operational Control **WAC 173-401-720(1)(d)**

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(1)(d).

G7. Misrepresentation and Tampering **SWCAA 400-105(5) & (6)**

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.

WAC 173-400-700

WAC 173-460 (Effective 8/21/1998) (Local Only)

G8. New Source Review **SWCAA 400-109, SWCAA 400-800**

The Permittee shall not construct or modify a source which is required to be reviewed under WAC 173-400-700, WAC 173-460 (effective 8/21/1998), SWCAA 400-109 or SWCAA 400-800 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. This requirement is not applicable to emission units that comply with the provisions of SWCAA 400-072.

SWCAA 400-036

G9. Portable Sources **SWCAA 400-110(6)**

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/emission units have an air discharge permit to operate as a portable source or have an approved permit that meets the requirements of SWCAA 400-036;
- (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; and
- (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.

Replacement or Substantial Alteration of Emission Control**G10. Technology at an Existing Stationary Source** **SWCAA 400-114**

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. Maintenance of Process Equipment **SWCAA 400-116(1)**

Any process equipment, including features, machines, and devices constituting parts of or called for by plans, specifications, or other information submitted for approval or required as part of an approval shall be maintained and operate in good working order. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

G12. Maintenance of Pollution Control Equipment **SWCAA 400-116(2)**
ADP 95-1800R5, Condition 8

Any equipment that serves as air contaminant control or capture equipment shall be maintained and operated in good working order at all times in accordance with good operations and maintenance practices and in accordance with Agency approval conditions. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

G13. Outdoor Burning **SWCAA 425 (Local Only)**

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

40 CFR 61, Subpart M

SWCAA 400-075

G14. Asbestos **SWCAA 476**

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.

G15. Protection of Stratospheric Ozone **40 CFR 82, Subpart F**

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

G16. Chemical Accident Prevention Program **40 CFR 68**

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.

G17. Reporting of Emission of Greenhouse Gases **WAC 173-441 (State Only)**

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 effective date for each applicable requirement is listed in Section II of this Permit. 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 intended to provide a reasonable assurance of compliance with the applicable requirements, and may or may not involve the use of a reference test method.

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 1	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 400-040(1)]	Plantwide	M1
Req 2	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) – <i>Local Only</i>]	Plantwide	M2 M3
Req 3	Permittee shall take reasonable precautions to prevent the release of air contaminants from any operation that emits fugitive emissions. [ADP 95-1800R5, Condition 6] [SWCAA 400-040(3)]	Plantwide	M2
Req 4	Operations that cause or contribute to a nuisance odor shall use recognized good practice and procedures to reduce these odors to a reasonable minimum. [ADP 95-1800R5, Condition 7] [SWCAA 400-040(4) - <i>Local Only</i>]	Plantwide	M2 M3
Req 5	Permittee shall not cause or permit the emission of any air contaminant detrimental to persons, property or business. [SWCAA 400-040(5)]	Plantwide	M3

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 6	<p>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 sixty (60) consecutive minutes.</p> <p>Reference Method: 40 CFR 60, Appendix A, Method 6</p> <p>[SWCAA 400-040(6)]</p>	Plantwide	M5 M10 M12 M13
Req 7	<p>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.</p> <p>[SWCAA 400-040(7)]</p>	Plantwide	Compliance Certification
Req 8	<p>Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.</p> <p>[SWCAA 400-040(8)(a)]</p>	Plantwide	M2
Req 9	<p>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.</p> <p>Reference Method: 40 CFR 60, Appendix A, Method 5</p> <p>[SWCAA 400-050(1)]</p>	Plantwide	M2
Req 10	<p>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.</p> <p>Reference Method: 40 CFR 60, Appendix A, Method 5</p> <p>[SWCAA 400-060]</p>	Plantwide	M2
Req 11	<p>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.</p> <p>[SWCAA 400-070(8)(a) & (b)]</p>	Plantwide	M2

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 12	Plantwide NO _x emissions shall not exceed 97.0 tons during any 12 consecutive month period. [ADP 95-1800R5, Condition 1]	Plantwide	M14
Req 13	Plantwide CO emissions shall not exceed 88.0 tons during any 12 consecutive month period. [ADP 95-1800R5, Condition 1]	Plantwide	M14
Req 14	Plantwide SO ₂ emissions shall not exceed 42.0 tons during any 12 consecutive month period. [ADP 95-1800R5, Condition 1]	Plantwide	M14
Req 15	Plantwide PM emissions shall not exceed 79.5 tons during any 12 consecutive month period. [ADP 95-1800R5, Condition 1]	Plantwide	M14
Req 16	Plantwide VOC emissions shall not exceed 29.5 tons during any 12 consecutive month period. [ADP 95-1800R5, Condition1]	Plantwide	M14
Req 17	Plantwide NH ₃ emissions shall not exceed 93.0 tons during any 12 consecutive month period. [ADP 95-1800R5, Condition 1]	Plantwide	M14
Req 18	Air pollutant exhaust points shall not be equipped with a rain protection cap that inhibits vertical discharge during operation. [ADP 95-1800R5, Condition 9]	EU1 EU2 EU3 EU4 EU5	Compliance Certification
Req 19	Each pollution control device shall be operated whenever the processing 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 95-1800R5, Condition 8]	EU1 EU2 EU3 EU4 EU5	Compliance Certification

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 20	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 EU2	Compliance Certification
Req 21	Permittee shall only fire natural gas in the Combustion Turbine, startup boiler, and gas heater. [ADP 95-1800R5, Condition 10] [40 CFR 60.44b(j)&(k)] [SWCAA 400-115]	EU1 EU2 EU3	Compliance Certification
Req 22	Exhaust gases from the Combustion Turbine shall be discharged vertically at a minimum height of 198 feet above ground level. [ADP 95-1800R5, Condition 11]	EU1	Compliance Certification
Req 23	NO _x emissions from the Combustion Turbine shall not exceed: 40.0 lb/hr (1 hr avg); 4.0 ppmvd @ 15% O ₂ (24 hr avg, rolled hourly); and 3.3 ppmvd @ 15% O ₂ (12 mth avg, rolled monthly). Reference Method: 40 CFR 60, Appendix A, Method 20 [ADP 95-1800R5, Condition 3] [40 CFR 60.332, 40 CFR 60.334(c)] [SWCAA 400-115]	EU1	M4 M6 M8
Req 24	CO emissions from the Combustion Turbine shall not exceed: 20.8 lb/hr (1 hr avg); and 6.0 ppmvd @ 15% O ₂ (1 hr avg). Reference Method: 40 CFR 60, Appendix A, Method 10 [ADP 95-1800R5, Condition 3]	EU1	M4 M6 M8
Req 25	SO ₂ emissions from the Combustion Turbine shall not exceed 51.1 lb/hr (1-hr avg). Reference Method: Mass Balance [ADP 95-1800R5, Condition 3] [40 CFR 60.333(b)] [SWCAA 400-115]	EU1	M4 M5 M8

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 26	<p>PM (filterable) emissions from the Combustion Turbine shall not exceed 9.0 lb/hr (1-hr avg).</p> <p>Reference Method: 40 CFR 60, Appendix A, Method 5</p> <p>[ADP 95-1800R5, Condition 3]</p>	EU1	M4 M5 M8
Req 27	<p>VOC emissions from the Combustion Turbine shall not exceed 6.6 lb/hr (1 hr avg).</p> <p>Reference Method: 40 CFR 60, Appendix A, Method 25A</p> <p>[ADP 95-1800R5, Condition 3]</p>	EU1	M4 M5 M8
Req 28	<p>NH₃ emissions from the Combustion Turbine shall not exceed: 22.9 lb/hr (1 hr avg); and 10.0 ppmvd @ 15% O₂ (1 hr avg).</p> <p>Reference Method: BAAQMD Method ST-1B</p> <p>[ADP 95-1800R5, Condition 3]</p>	EU1	M4 M5 M8
Req 29	<p>The short-term emission limits identified in Req-23 through Req-28 (i.e., limits with an averaging time of 24 hr or less) shall not apply during turbine startup and shutdown periods. A turbine startup period is defined as the length of time from establishment of a flame in the turbine to attainment of base load. A turbine shutdown period is defined as the length of time from initiation of shutdown procedures to cessation of operation. In no event, shall applicability of short-term emission limits be suspended for greater than 12 hours during a startup or 4 hours during a shutdown.</p> <p>[ADP 95-1800R5, Condition 3]</p>	EU1	M7
Req 30	<p>Visible emissions from the Combustion Turbine shall not exceed 5% for more than three minutes (aggregate) in any 1-hour period.</p> <p>Reference Method: SWCAA Method 9 (SWCAA 400, Appendix A)</p> <p>[ADP 95-1800R5, Condition 2]</p>	EU1	M1

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 31	<p>Permittee shall not fire any fuel in the turbine which contains sulfur in excess of 0.8% by weight.</p> <p>Reference Method: ASTM D1072, D 2880-71, D3031-81, D 4084-82, or D 3246-81</p> <p>[40 CFR 60.333(b)] [SWCAA 400-115] [ADP 95-1800R5, Condition 12]</p>	EU1	M5
Req 32	<p>Only aqueous ammonia shall be stored, handled and injected in the Combustion Turbine's ammonia injection system. Anhydrous ammonia shall not be used. The amount of ammonia stored onsite for use in the ammonia injection system shall not exceed 19,500 lbs.</p> <p>[ADP 95-1800R5, Conditions 13 & 14]</p>	EU1	M9
Req 33	<p>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.</p> <p>[40 CFR 72.9(c)(1)] [WAC 173-406-106(3)(a)(i)]</p>	EU1	Compliance Certification
Req 34	<p>Exhaust gases from the startup boiler shall be discharged vertically at a minimum height of 83 feet above ground level.</p> <p>[ADP 95-1800R5, Condition 11]</p>	EU2	Compliance Certification
Req 35	<p>NO_x emissions from the startup boiler shall not exceed 4.3 lb/hr.</p> <p>Reference Method: EPA Method 7E (40 CFR 60, App. A)</p> <p>[ADP 95-1800R5, Condition 4]</p>	EU2	M10 M11
Req 36	<p>CO emissions from the startup boiler shall not exceed 6.3 lb/hour.</p> <p>Reference Method: EPA Method 10 (40 CFR 60, App. A)</p> <p>[ADP 95-1800R5, Condition 4]</p>	EU2	M10 M11

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 37	SO ₂ emissions from the startup boiler shall not exceed 2.9 lb/hour. Reference Method: EPA Method 6C (40 CFR 60, App. A) [ADP 95-1800R5, Condition 4]	EU2	M10 M11
Req 38	PM (filterable) emissions from the startup boiler shall not exceed 1.4 lb/hour. Reference Method: EPA Method 5 (40 CFR 60, App. A) [ADP 95-1800R5, Condition 4]	EU2	M10 M11
Req 39	VOC emissions from the startup boiler shall not exceed 0.2 lb/hour. Reference Method: EPA Method 25A (40 CFR 60, App. A) [ADP 95-1800R5, Condition 4]	EU2	M10 M11
Req 40	Visible emissions from the startup boiler shall not exceed 5% opacity for more than 3-minutes (aggregate) in any 1-hour period. Reference Method: SWCAA Method 9 (SWCAA 400, App. A) [ADP 95-1800R5, Condition 2]	EU2	M1
Req 41	The annual capacity factor of the startup boiler shall not exceed 10%. [40 CFR 60.44b(j)&(k)] [ADP 95-1800R5, Condition 15]	EU2	M10
Req 42	NO _x emissions from the fuel gas heater shall not exceed 1.3 tpy. Reference Method: EPA Method 7E (40 CFR 60, App. A) [ADP 95-1800R5, Condition 5]	EU3	M12
Req 43	CO emissions from the fuel gas heater shall not exceed 1.0 tpy. Reference Method: EPA Method 10 (40 CFR 60, Appendix A) [ADP 95-1800R5, Condition 5]	EU3	M12

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 44	PM (filterable) emissions from the fuel gas heater shall not exceed 0.1 tpy. Reference Method: EPA Method 5 (40 CFR 60, App. A) [ADP 95-1800R5, Condition 5]	EU3	M12
Req 45	VOC emissions from the fuel gas heater shall not exceed 0.4 tpy. Reference Method: EPA Method 25A (40 CFR 60, App. A) [ADP 95-1800R5, Condition 5]	EU3	M12
Req 46	Visible emissions from the fuel gas heater shall not exceed 0% for more than 3 minutes (aggregate) in any 1-hour period. Reference Method: SWCAA Method 9 (SWCAA 400, App. A) [ADP 95-1800R5, Condition 2]	EU3	M1
Req 47	Operation of the emergency generator for the purposes of testing and maintenance shall not exceed 24 hr/yr. This limit does not apply to emergency service during actual power outages. [ADP 95-1800R5, Condition 16] [40 CFR 63.6640(f)(1)]	EU4	M13
Req 48	Operation of the fire pump for the purposes of testing and maintenance shall not exceed 28 hr/yr. This limit does not apply to use of the fire pump during an actual fire. [ADP 95-1800R5, Condition 17] [40 CFR 63.6640(f)(1)]	EU5	M13

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 49	<p>Operation of emergency engines for purposes other than those described below is prohibited.</p> <p>(a) Emergency engines may operate without limit in response to emergency situations.</p> <p>(b) Emergency engines may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. Operation for maintenance checks and readiness testing may not exceed 100 hours per calendar year.</p> <p>(c) Emergency engines may be operated for up to 50 hours per year in nonemergency situations, but such operation cannot be used for peak shaving, non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. Nonemergency operation is counted against the 100 hours per calendar year allowance for maintenance and readiness testing.</p> <p>[40 CFR 63.6640(f)]</p>	EU4 EU5	M13
Req 50	<p>The permittee shall equip each emergency engine with a non-resettable hour meter.</p> <p>[40 CFR 63.6625(f)]</p>	EU4 EU5	Compliance Certification
Req 51	<p>The permittee shall minimize the time each emergency engine spends at idle and minimize each engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.</p> <p>[40 CFR 63.6625(h), Table 2c]</p>	EU4 EU5	M13

Req. #	Applicable Requirement	Emission Point	Monitoring
Req 52	<p>Emergency engines shall be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.</p> <p>Emergency engines shall be operated and maintained according to the manufacturer's emission-related written instructions or a facility specific maintenance plan that provides for the maintenance and operation of the Emergency Generator in a manner consistent with good air pollution control practice for minimizing emissions.</p> <p>[40 CFR 63.6605(b), 63.6625(e)] [40 CFR 63.6640(a), Table 6]</p>	EU4 EU5	M13
Req 53	<p>The permittee shall conduct the following maintenance for each emergency engine:</p> <ul style="list-style-type: none"> (a) Change oil and filter every 500 hours of operation or annually, whichever comes first. An oil analysis program as described in 40 CFR 63.6625(i) may be utilized in lieu of the proscribed intervals. (b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first. Replace as necessary. (c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first. Replace as necessary. <p>[40 CFR 63.6603(a), Table 2d] [40 CFR 63.6640(a)]</p>	EU4 EU5	M13

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), monitoring requirements are not applicable to IEUs unless specified below.

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

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

This monitoring requirement applies to Reqs 1, 30, 40, 46

This monitoring requirement is applicable to both EU's and IEUs.

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).

General**M2. Fugitive Emissions/Particulate Matter Monitoring****WAC 173-401-615(1)**

This monitoring requirement applies to Reqs 2-4, 8-11

This monitoring requirement is applicable to both EU's and IEUs.

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, odors, fallout and potential violations of applicable particulate matter emission limits. Based upon results of the inspection, the permittee shall take one or more of the following actions:

- (a) If no visible emissions, odor or fallout 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, odor or fallout are observed during an inspection, the permittee shall verify the emission unit or process that is the source of 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 inspection shall be made. If visible emissions, odor or fallout 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. 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).

General

M3. Complaint Monitoring WAC 173-401-615(1)

This monitoring requirement applies to Reqs 2, 4-5

This monitoring requirement is applicable to both EU's and IEUs.

The permittee shall record, and maintain record of, any air quality related complaints received by the facility. 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

40 CFR 75

M4. Operations Monitoring ADP 95-1800R5, Conditions 22 & 25

This monitoring requirement applies to Reqs 23-28

The permittee shall monitor and record the operational parameters/events listed below.

- (a) Hourly heat input (MMBtu/hr) for every hour or part of any hour during which fuel is combusted following procedure 5 in Appendix F of 40 CFR Part 75;
- (b) Hourly fuel consumption (MMscf/hr);
- (c) Hourly turbine output (MW);
- (d) Startup and shutdown periods;
- (e) Combustion turbine maintenance and repair activities;
- (f) CEMS calibration and cylinder gas audit results;
- (g) CEMS maintenance and repair activities;
- (h) Differential pressure across each catalyst bed monitored continuously and recorded once per workshift;
- (i) Temperature before and after each catalyst bed monitored continuously and recorded once per workshift;
- (j) Hourly ammonia consumption (lbs);
- (k) Average hourly NO_x and CO emission concentration (ppmvd @ 15% O₂);
- (l) Average hourly O₂ concentration (dry volume percent);

**40 CFR 60.334(h)(3), 40 CFR 75.10(a), 40 CFR 75.11
WAC 173-401-615(1), WAC 173-406-106(2)
ADP 95-1800R5, Condition 31**

Combustion Turbine

M5. General Emissions Monitoring

This monitoring requirement applies to Reqs 6, 25-28, 31

The fuel sulfur content of natural gas combusted in the Combustion Turbine on an annual basis shall be determined in accordance with 40 CFR 75.11.

Daily CO₂ emission rates (ton/dy) shall be calculated based on the procedures specified in 40 CFR 75.10(a)(3).

Hourly SO₂ emission rates shall be calculated from contemporaneous heat input values and the most recent sulfur content monitoring results in accordance with 40 CFR Part 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, PM and NH₃ emissions shall be calculated from contemporaneous heat input values and the most recent emission test data for the Combustion Turbine.

**40 CFR 60, App B & F, 40 CFR 75
WAC 173-406-106(2)**

Combustion Turbine

M6. NO_x and CO Emissions Monitoring

ADP 95-1800R5, Conditions 21 & 30

This monitoring requirement applies to Reqs 23-24

A CEMS/DAHS for NO_x and O₂ shall be installed and maintained in accordance with the requirements and specifications found in 40 CFR 75 – Continuous Emissions Monitoring. Hourly NO_x emission rates (lb/MMBtu) shall be calculated based on the monitored NO_x concentration (ppmv) and diluent concentration (dry volume percent O₂) in accordance with the procedures in 40 CFR 75, Appendix F. Hourly NO_x emissions (lb/hr) shall be calculated using the hourly NO_x emission rate and the average heat input to the turbine as determined in M5.

A CEMS/DAHS for CO shall be installed and maintained in accordance with the requirements and specifications found in 40 CFR 60, Appendix B - Performance Specification 4A "Specifications and Test Procedures for Carbon Monoxide Continuous Emission Monitoring Systems in Stationary Sources" and 40 CFR 60, Appendix F "Quality Assurance Procedures". Hourly CO emission rates (lb/MMBtu) shall be calculated based on the monitored CO concentration (ppmv) and diluent concentration (dry volume percent O₂) in accordance with Equation 19-1 from 40 CFR Part 60 Appendix A. Hourly CO emissions (lb/hr) shall be calculated using the hourly CO emission rate and the average heat input to the turbine as determined in M5.

Relative accuracy test audits (RATA) shall be conducted for each CEMS as specified in the applicable performance specification. RATA reports shall be submitted to SWCAA within 45 days of test completion and shall include all of the source test information required in R9 of this permit. Records of monitoring activities shall be maintained in accordance with Section K2 of this permit.

Combustion Turbine**M7. Startup and Shutdown Emissions ADP 95-1800R5, Condition 3, 22, 25(d)**

This monitoring requirement applies to Req 29

Turbine 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 considered in determining compliance with annual facility wide emission limits.

Combustion Turbine**M8. Emission Testing ADP 95-1800R5, Condition 29**

This monitoring requirement applies to Reqs 23-28

The Combustion Turbine shall be emission tested for NO_x, CO and NH₃ on a continuing 12-month cycle in accordance with the protocol found in Appendix A of this permit. Tested emission concentrations from the Combustion Turbine shall be corrected to units that correspond to the emission limitations contained in this permit. Tested NO_x concentrations shall also be corrected to 15% O₂.

Initial emission testing for the Combustion Turbine was conducted on September 11-12, 1997 and October 23, 1997. The initial testing quantified emissions of NO_x, CO, SO₂, PM, VOC and NH₃.

Combustion Turbine**M9. Ammonia Concentration Monitoring ADP 95-1800R5, Condition 24**

This monitoring requirement applies to Req 32

The permittee shall maintain a record of the delivery date and ammonia concentration of each ammonia shipment. A certification from the ammonia supplier can be used to satisfy this requirement.

Startup Boiler**40 CFR 60.49b(d) & (p)****M10. Operations Monitoring ADP 95-1800R5, Condition 26**

This monitoring requirement applies to Reqs 35-39, 41

The permittee shall monitor and record the operational parameters listed below for each day of startup boiler operation:

- (a) Calendar date;
- (b) Hours of operation;
- (c) Hourly steam load;
- (d) Fuel consumption; and
- (e) Maintenance and repair activity.

A calculation of the annual capacity factor shall be made at the end of each calendar month. The annual capacity factor of the Startup Boiler shall be calculated by dividing actual annual heat input by potential annual heat input for the preceding 12 consecutive month period.

Monthly emissions of NO_x and CO shall be calculated from recorded heat input and the most recent emission test data. Emission calculations shall use the following equation:

$$\text{Emissions (lb/mth)} = \frac{(\text{Emission Factor lb/MMBtu}) * (\text{Heat Input/Month})}{(\text{Hours of Operation/Month})}$$

Monthly emissions of PM, VOC, and SO₂ shall be calculated based on recorded fuel consumption and the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u>	
PM	0.0039 lb/MMBtu	(initial emission test – 10/25/97)
VOC	0.0011 lb/MMBtu	(initial emission test – 10/25/97)
SO ₂	0.0006 lb/MMBtu	(AP-42, Section 1.4)

Startup Boiler

M11. Emission Testing

ADP 95-1800R5, Conditions 32 & 38

This monitoring requirement applies to Reqs 35-39

The Startup Boiler shall be emission tested on a continuing 5-year cycle in accordance with the protocol found in Appendix B of this permit. Measured pollutant concentrations from the Startup Boiler shall be corrected to dry standard conditions at 3% O₂. Emission rates of NO_x and CO (lb/MMBtu) shall be calculated based on the tested constituent concentration (ppmv) and diluent concentration (in percent O₂ or CO₂) in accordance with Equation 19-1 from 40 CFR Part 60 Appendix A.

Initial emission testing for the Startup Boiler was conducted on October 25, 1997. The initial testing quantified emissions of NO_x, CO, VOC and PM.

Fuel Gas Heater

M12. Operations Monitoring

ADP 95-1800R5, Condition 27

This monitoring requirement applies to Reqs 42-45

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

- (a) Fuel consumption; and
- (b) Hours of operation.

Monthly emissions from the Fuel Gas Heater shall be calculated based on recorded fuel consumption and the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u>
NO _x	0.117 lb/MMBtu
CO	0.089 lb MMBtu
PM	0.0115 lb/MMBtu
VOC	0.038 lb/MMBtu
SO ₂	0.0006 lb/MMBtu

Emergency Generator/Emergency Fire Pump**40 CFR 63.6655 & Table 6****M13. Operations Monitoring****ADP 95-1800R5, Condition 28**

This monitoring requirement applies to Reqs 47-49, 51-53

The Permittee shall monitor and record the following operational parameters for the Emergency Generator and Emergency Fire Pump:

- (a) 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; and
- (b) 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.

Monthly emissions from the Emergency Generator and the Emergency Fire Pump shall be calculated from recorded hours of operation, the respective horsepower rating of each engine, and the following emission factors from AP-42, Table 3.3-2 (5/95):

<u>Pollutant</u>	<u>Emission Factor</u>
NO _x	0.031 lb/hp-hr
CO	6.68E-3 lb/hp-hr
PM	2.20E-3 lb/hp-hr
TOC	2.47E-3 lb/hp-hr
SO ₂	2.05E-3 lb/hp-hr

Plantwide**WAC 173-401-615(1)****M14. Emissions Monitoring****ADP 95-1800R5, Conditions 1 & 36**

This monitoring requirement applies to Reqs 12-17

On a monthly basis, the Permittee shall determine the sum of NO_x, CO, PM, VOC, SO₂ and NH₃ 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. Pursuant to WAC 173-401-530(2)(c), recordkeeping requirements are not applicable to IEUs unless specified below.

WAC 173-401-615(2)

K1. General Recordkeeping**ADP 95-1800R5, Conditions 18-20**

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 inspection or certification; 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 95-1800R5, Conditions 21 & 22

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_{gc});
 - (4) Total turbine heat input (million Btu); and
 - (5) Combustion Turbine fuel consumption (MMBtu/hr).
 - (6) Average NO_x concentration (ppmvd @ 15%O₂);
 - (7) Average NO_x emission rate (lb/million Btu and lb/hr);
 - (8) Average CO concentration (ppmvd @ 15%O₂);
 - (9) Average CO emission rate (lb/hr);
 - (10) Average O₂ concentration (% O₂); and

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. Pursuant to WAC 173-401-530(2)(c), reporting requirements are not applicable to IEUs unless specified below.

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

Control Officer
Southwest Clean Air Agency
11815 NE 99 Street, Suite 1294
Vancouver, WA 98682

Clean Air Act Compliance Manager
U.S. EPA Region 10, Mail Stop: OCE-101
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Department of Ecology
Air Quality Program
PO Box 47600
Olympia, WA 98504-7600

**40 CFR 60.7(b), 40 CFR 64.9(a)(2)(i)
WAC 173-401-615(3)(b)
SWCAA 400-107**

R1. Deviations from Permit Conditions

ADP 95-1800R5, Conditions 34 & 35

The permittee shall report deviations from permit conditions to SWCAA 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 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;
- (c) Description of the event, including:
 - (1) Whether or not the deviation was due to an upset condition, and
 - (2) Probable cause of the deviations;
- (d) Estimate of the quantity of excess emissions for exceedances of non-opacity emission limits;
- (e) Description of corrective action taken in response to the event (if any); and
- (f) Preventive measures taken or planned to minimize future recurrence.

WAC 173-401-615(3)**R2. Complaint Reports****ADP 95-1800R5, Condition 37**

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 corrective action taken in response to complaint (if any).

R3. Startup and Shutdown Reports**ADP 95-1800R5, Condition 39**

The Permittee shall report each Combustion Turbine startup and shutdown period to SWCAA within 24 hours of occurrence.

40 CFR 75.64, 75.65**WAC 173-401-615(3)****R4. Quarterly Reports****ADP 95-1800R5, Condition 36****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 plant inspections as described in monitoring requirements M1 thru M4. 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) Hours of operation for all emission units;
- (d) Quantity of fuel burned in emission units EU1, EU2, and EU3;
- (e) Ammonia flow for each hour of turbine operation;
- (f) Quantity of ammonia used during the reporting period;
- (g) Hourly and daily (24-hr) CEMS/DAHS values for each data element identified in Section K2.(b) of this permit;
- (h) The 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) Information required under 40 CFR 60 Subparts Db and GG and other implementing sections such as 40 CFR 60.7 and 40 CFR 60.8 unless provisions have been waived by EPA administrative action;
- (k) Annual capacity factor for EU-2 for the previous 12-month period as described in 40 CFR 60.49b(q); and
- (l) Summary of plantwide emissions of criteria pollutants, volatile organic compounds and ammonia for each month of the reporting period, the total for the reporting period, and the 12-month rolling total.

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:

- (m) 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.),

- (n) Tons (rounded to the nearest tenth) of SO₂ emitted during the quarter and cumulative SO₂ emissions for the calendar year,
- (o) Tons of CO₂ emitted during the quarter and cumulative CO₂ emissions for the calendar year, and
- (p) Total heat input (million Btu) for the quarter and cumulative heat input for the calendar year;

40 CFR 63.6650(f)

R5. 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.

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

SWCAA 400-105

R6. Emission Inventory Reports

ADP 95-1800R5, Condition 33

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 NO_x, SO₂, CO, VOC, PM, PM₁₀, PM_{2.5}, hazardous air pollutants, and toxic air pollutants as defined in WAC 173-460 (effective 8/21/98). TAP emissions shall be calculated consistent with the emission factors and methodology presented in the Technical Support Document for ADP 95-1800R5.

40 CFR 72.90, 40 CFR 75.60

R7. Annual Compliance Certification

WAC 173-401-630(5)

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.

R8. Fuel Sulfur Content Reports **ADP 95-1800R5, Condition 38**

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

- (a) Time and date of the fuel 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.

WAC 173-401-615(3)**SWCAA 400-106****R9. Emission Test Reports** **ADP 95-1800R5, Condition 38**

The permittee shall do the following for each emission test:

- (a) Submit a comprehensive test plan to SWCAA for review and approval at least ten business days prior to any periodic testing;
- (b) Notify SWCAA at least five business days in advance of any periodic testing so that SWCAA personnel may be present during testing;
- (c) Report a summary of operating conditions for each test run as specified in ADP 95-1800R5, Appendices A and C;
- (d) Report required test results to SWCAA within 45 days of test completion. All gaseous emissions shall, as a minimum, be reported in parts per million by volume, pounds per hour, and pounds per million Btu of heat input. Emissions data shall be corrected to units that correspond to the applicable standard. Each required source test report shall include:
 - (1) A 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) A summary of results, reported in units and averaging periods consistent with the applicable emission standard or limit,
 - (4) A summary of control system or equipment operating conditions,
 - (5) A 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.

R10. 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 Stationary Compression**N1. Ignition Internal Combustion Engines 40 CFR 60, Subpart IIII**

Subpart IIII 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 two compression ignition internal combustion engine emission units (emergency generator, fire pump). Both the units were manufactured prior to April 1, 2006, and have not been modified or reconstructed. Therefore, this regulation is not applicable.

Standards of Performance for Stationary Combustion**N2. Turbines 40 CFR 60, Subpart KKKK**

Subpart KKKK establishes performance standards for stationary combustion 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 February 18, 2005. The Combustion Turbine at this facility commenced construction prior to February 18, 2005 so this regulation is not applicable.

National Emission Standards for Hazardous Air Pollutants**N3. for Industrial Process Cooling Towers 40 CFR 63, Subpart Q**

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**N4. for Combustion Turbines 40 CFR 63, Subpart YYYY**

Subpart YYYY 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

N5. for Stationary Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ

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 semiannual compliance reports.

National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial,

N6. Commercial, and Institutional Boilers and Process Heaters 40 CFR 63, Subpart DDDDD

Subpart DDDDD establishes performance standards for any existing, new, or reconstructed industrial, commercial, or institutional boiler or process heater 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 Area Sources:

N7. Industrial, Commercial, and Institutional Boilers 40 CFR 63, Subpart JJJJJJ

Subpart JJJJJJ establishes performance standards for existing, new, or reconstructed industrial, commercial, and institutional boilers located at a facility that is an area source of hazardous air pollutant emissions. This facility has one emission unit that meets the definition of an industrial boiler (EU2). The boiler in question is a natural gas fired steam boiler with a rated heat input of 103.5 MMBtu/hr. The boiler is classified as a "gas fired boiler", which is not subject to the regulation pursuant to 40 CFR 63.11195(e). Therefore, this requirement is not applicable.

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. Since the turbine, EU-1, is subject to the Acid Rain Program requirements for NO_x and has a continuous compliance determination method for CO (CO CEM), the permittee is exempt from 40 CFR 64 requirements pursuant to 40 CFR 64.2(b)(1)(iii) and 64.2(b)(1)(vi).

N9. 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>

**Carbon Dioxide Mitigation Program, Greenhouse Gases
Emissions Performance Standard and Sequestration Plans And**

N10. Programs for Thermal Electric Generating Facilities (State Only) WAC 173-407

Chapter 173-407 WAC contains provisions for mitigation of carbon dioxide emissions from fossil-fueled thermal electric generating facilities and greenhouse gas performance standards for baseload electric generation facilities. As described in WAC 173-401-600, the requirements in an AOP are drawn from the Federal and State Clean Air Acts, State and Local air permits, State and Local air pollution regulations, Chapter 70.98 RCW, and Chapter 80.50 RCW. Chapter 173-407 WAC is intended to implement the provisions of Chapters 80.70 RCW and 80.80 RCW. Therefore, requirements of Chapter 173-407 which may be applicable to the facility are not appropriate for inclusion in this Permit.

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.

WAC 173-400-120

N13. Bubble Rules SWCAA 400-120

The permittee has not requested an emission bubble for any regulated pollutant. Therefore, this regulation is not applicable.

SWCAA 400-130, SWCAA 400-131

N14. Emission Reduction Credits SWCAA 400-136

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.

N15. 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.

APPENDIX A

Emission Testing Requirements / Combustion Turbine

1. Introduction:

The purpose of these emission testing requirements is to quantify emissions from the Combustion Turbine, 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 testing. SWCAA personnel shall be informed at least five business days prior to testing so that a representative may be present during the test.
- b. **Testing schedule.** Emission testing shall be conducted on a 12-month cycle, no later than the end of October each year. The initial source test for the Combustion Turbine was conducted on September 11-12, 1997 and October 23, 1997. Tested pollutants included NO_x, CO, SO₂, PM, VOC, and NH₃.
- c. **Test runs/Reference test methods.** Testing for each identified constituent pollutant shall consist of at least three test runs of the specified duration. All sampling shall be conducted at the outlet of the turbine/HRSG. Compliance with applicable emission limits shall be demonstrated by averaging the results of individual test runs. The test methods identified below shall be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing. Relative Accuracy Test Audit (RATA) sampling runs for NO_x and CO may be used to comply with the annual emission testing requirement for those constituents (i.e., (3) 21-minute RATA runs = (1) 60-minute emission test run).

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
Flow rate, temperature	EPA Methods 1 and 2	N/A
O ₂ , CO ₂ content	EPA Method 3 or 3A	60 minutes
Moisture content	EPA Method 4	60 minutes
NO _x	EPA Method 7E	60 minutes
CO	EPA Method 10	60 minutes
NH ₃	BAAQMD ST-1B	30 minutes
Opacity	SWCAA Method 9	6 minutes

3. Source Operation:

- a. **Source operation.** The Combustion Turbine shall be operated at loads greater than 95% for the duration of testing.
- 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 fuel input, turbine output, process startups and shutdowns, and plant adjustments. All recorded production parameters shall be documented in the emission test report.

4. Reporting Requirements:

- a. **Test report.** A final test report must be prepared and submitted to SWCAA within 45 calendar days of test completion. Unless otherwise directed by SWCAA, a single hard copy of the report and an electronic copy (e.g., Adobe format) of the report must be submitted SWCAA. Each report must include:
- (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. **Oxygen correction.** All test results for constituent emission concentration shall be corrected to 15% oxygen.

APPENDIX B

Emission Testing Requirements / Startup Boiler

1. Introduction:

The purpose of these emission testing requirements is to quantify emissions from the startup boiler, 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 five business days prior to testing so that a representative may be present during the test.
- b. **Testing schedule.** Emission testing shall be conducted on a (5) year cycle, no later than the end of October of the respective year. The initial source test for the startup boiler was conducted on October 25, 1997. Tested pollutants included NO_x, CO, PM, and VOC.
- c. **Test runs/Reference test methods.** Testing for each identified constituent shall consist of at least (3) sampling runs of the specified duration. All sampling shall be conducted at the outlet of the startup boiler. Compliance with applicable emission limits shall be demonstrated by averaging the results of individual sampling runs. The test methods identified below shall be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

<u>Constituent</u>	<u>Reference Test Method</u>	<u>Minimum Test Run Duration</u>
Flow rate, temperature	EPA Methods 1 and 2	N/A
O ₂ , CO ₂ content	EPA Method 3A	60 minutes
Moisture content	EPA Method 4	60 minutes
NO _x	EPA Method 7E	60 minutes
CO	EPA Method 10	60 minutes

3. Source Operation:

- a. **Source operation.** The startup boiler shall be operated at maximum achievable operating capacity for the duration of testing.
- 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 fuel consumption, steam production, and plant adjustments. All recorded production parameters shall be documented in the test results report.

4. Reporting Requirements:

- a. **Test report.** A final test report must be prepared and submitted to SWCAA within 45 calendar days of test completion. Unless otherwise directed by SWCAA, a single hard copy of the report and an electronic copy (e.g. Adobe format) of the report must be submitted SWCAA. Each report must include:
- (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. **Oxygen correction.** All test results for constituent emission concentration shall be corrected to 3% oxygen.

APPENDIX C
Acid Rain Permit No. SW-ARP-2-R3

Issued to: River Road Generating Plant
Operated by: Clark Public Utilities

Address: 5509 NW Lower River Road (SR 501)
Vancouver, WA 98666

ORIS code: 07605
Affected unit: Turbine (Unit #1)

Effective Date: This Acid Rain permit, will become effective concurrent with the renewal of the associated Title V permit for the River Road Generating Plant (SW99-9-R3). 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 NO_x 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: The Southwest Clean Air Agency issues this permit in accordance with Washington Administrative Code (WAC) 173-406 "Acid Rain Regulation" and WAC 173-401 "Operating Permit Regulation". 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 NO_x Requirements

Affected Unit	Requirement	2018	2019	2020	2021	2022	2023
Turbine (Unit 1)	SO ₂ Allowances	TBD ^{a,b}					
	Acid Rain NO _x Limit ^c	N/A	N/A	N/A	N/A	N/A	N/A

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 95-1800R5, and is included as an applicable requirement in the Air Operating Permit for the River Road Generating Plant.
- ^c Since this unit is not a coal fired unit, there are no applicable acid rain NO_x emission limits and a Phase II NO_x permit application is not required. A NO_x emission limitation has been established for the Combustion Turbine in ADP 95-1800R5, and is included as an applicable requirement in the Air Operating Permit for the River Road Generating Plant.

4) Standard RequirementsPermit Requirements

- (1) The designated representative of the River Road Generating Plant and each affected unit at the River Road Generating Plant 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 WAC 173-406-301; 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 or operators of the River Road Generating Plant and each affected unit at the River Road Generating Plant 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 the River Road Generating Plant and each affected unit at the River Road Generating Plant 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 River Road Generating Plant.

Sulfur Dioxide Requirements

- (1) The owners and operator of the River Road Generating Plant 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 River Road Generating Plant and each affected unit at the River Road Generating Plant 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 River Road Generating Plant and

each affected unit at the River Road Generating Plant 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 River Road Generating Plant and each affected unit at the River Road Generating Plant 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 River Road Generating Plant and each affected unit at the River Road Generating Plant shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to the River Road Generating Plant (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of the River Road Generating Plant and to the affected units at the River Road Generating Plant.
- (6) Any provision of the Acid Rain Program that applies to an affected unit at the River Road Generating Plant (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 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 a gas-fired combustion turbine (Unit ID #1) was received by SWCAA on March 27, 2015. A copy of the permit application is included below.

River Road Generating Plant:

Permit Requirements

STEP 3

Read the standard requirements.

- (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).

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River Road Generating Plant

Sulfur Dioxide Requirements, Cont'd.

STEP 3, 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

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Five-Road Generating Plant

submission of a new certificate of representation changing the designated representative;

STEP 3, Cont'd.

Recordkeeping and Reporting Requirements, 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 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 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:

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River Road Generating Plant

STEP 3, Cont'd.

(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.

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;

STEP 4
Recd the
certification
statement,
sign, and date.

(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 Terry Toland - Energy Resources Manager	
Signature <i>Terry Toland</i>	Date 3-27-15

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