SWCAA
Southwest Clean Air Agency

5101 NE 82nd Ste 101
Vancouver, WA 98662
(360) 574-3058
www.swcleanair.gov

May 3, 2024

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

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

Dear Mr. Toland:

The Southwest Clean Air Agency (SWCAA) is issuing proposed Air Operating Permit SW99-9-R4 to Clark Public Utilities – River Road Generating Plant. This is a renewal permit.

A copy of the proposed Air Operating Permit and associated Basis Statement are enclosed with this letter. Electronic copies of each document will also be available on SWCAA's website at www.swcleanair.org. Copies of the final Air Operating Permit and Basis Statement will be sent to you following the close of the EPA review period for the proposed permit.

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-R4

May 3, 2024

PROPOSED

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

AIR OPERATING PERMIT NUMBER: SW99-9-R4

ISSUED TO: Clark Public Utilities
PO 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

STANDARD INDUSTRIAL CLASSIFICATION CODE (SIC): 4911

NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM CODE (NAICS): 221112

AEROMETRIC INFORMATION RETRIEVAL SYSTEM NUMBER: 53-011-00150

EFFECTIVE DATE: TBD

EXPIRATION DATE: *5 years after issuance*

RENEWAL APPLICATION DUE DATE: *1 year before expiration*

PERMIT ENGINEER:

Wess Safford, AQ Engineer — Date

REVIEWED BY:

Clint Lamoreaux, Chief Engineer — Date

Uri Papish, Executive Director — Date

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I. ABBREVIATIONS

List of Common Abbreviations

ADP	Air Discharge Permit
AOP	Air Operating Permit
CAM	Compliance Assurance Monitoring (40 CFR 64)
CEMS	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon monoXide
EPA	U.S. Environmental Protection Agency
EU	Emissions unit
FCAA	Federal Clean Air Act
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous air pollutant
IEU	Insignificant emissions unit as per WAC 173-401-530
lb/hr	Pounds per hour
lb/MMBtu	Pounds per million British thermal units
M#	Refers to a specific monitoring term or condition numbered "#"
MMBtu	Million British thermal units
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
PM	Particulate matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers
ppm	Parts per million
ppmvd	Parts per million, dry volume basis
R#	Refers to a specific reporting requirement numbered "#"
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
Region 10	Region 10 of the U.S. Environmental Protection Agency
Req#	Applicable operating term or condition (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 or the dictionary definition, as appropriate.

II. REGULATORY BASIS

This Air Operating Permit, hereafter referred to as the "Permit", is authorized under the procedures established in Washington Administrative Code (WAC) 173-401 and Title V (US Code §7661 *et seq.*) of the Federal Clean Air Act (FCAA). As used in this Permit, "term", "condition", "standard", and "requirement" have the same meaning as "applicable requirement" specified under 40 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. As listed in Sections V through VIII, the requirements describe the emissions limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the facility 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 that can enforce *all* requirements – federal, state, and local requirements – listed in the Permit. However, the 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 and are denoted as "*Local*" to indicate they are only enforceable by SWCAA.

For subparts of 40 CFR 60, 40 CFR 61, and 40 CFR 63 delegated to SWCAA by EPA, all monitoring, reporting, or recordkeeping that is required to be sent to the EPA Administrator must only be sent to SWCAA as the delegated authority. For specific subparts that SWCAA has not been delegated implementation and enforcement authority by the EPA, all monitoring, reporting, or recordkeeping that is required to be sent to the EPA Administrator must be sent to both SWCAA and the EPA Administrator.

Federal Regulations	Regulation Version Effective Date	SWCAA Delegation Effective Date
40 CFR 51	March 13, 2024	Not Delegated
40 CFR 52	March 13, 2024	Not Delegated
40 CFR 60 Subpart A	March 13, 2024	September 1, 2022
40 CFR 60 Subpart Db	March 13, 2024	September 1, 2022
40 CFR 60 Subpart GG	March 13, 2024	September 1, 2022
40 CFR 63 Subpart A	March 13, 2024	September 1, 2022
40 CFR 63 Subpart ZZZZ	March 13, 2024	September 1, 2022 (Title V Sources Only)
40 CFR 63 Subpart JJJJJJ	March 13, 2024	September 1, 2022 (Title V Sources Only)
40 CFR 64	July 1, 2000 (WAC 173-401-615(4))	Not Delegated
40 CFR 68	March 13, 2024	Not Delegated

Federal Regulations	Regulation Version Effective Date	SWCAA Delegation Effective Date
40 CFR 72	March 13, 2024	Not Delegated
40 CFR 75	March 13, 2024	Not Delegated
40 CFR 82 Subpart F	March 13, 2024	Not Delegated

State and local regulations may have both an effective date that is included in the SIP and different effective date as *Local* only requirements.

State Regulations	SIP Regulation Version Effective Date	State Regulation Version Effective Date
WAC 173-400-117	December 29, 2012	November 25, 2018
WAC 173-400-171	September 16, 2018 [excludes (3)(b) that says, "or any increase in emissions of a toxic air pollutant above the acceptable source impact level for that toxic air pollutant as regulated under chapter 173-460 WAC", (3)(o), (12)]	November 25, 2018
WAC 173-400-700	April 1, 2011	November 25, 2018
WAC 173-400-720	July 1, 2016 [excludes (4)(a)(i-iv) and (4)(b)(iii)(C)]	November 25, 2018
WAC 173-401	—	September 16, 2018
WAC 173-406	—	December 24, 1994
WAC 173-441	—	October 16, 2016
WAC 173-446	—	October 30, 2022
WAC 173-460	—	December 23, 2019

SWCAA Regulations	SIP Regulation Version Effective Date	SWCAA Regulation Version Effective Date
SWCAA 400-030	September 10, 2021 (excludes (21) and (130)	February 11, 2023
SWCAA 400-036	September 10, 2021	February 11, 2023
SWCAA 400-040	October 9, 2016 (excludes (1)(a), (1)(c), (1)(d), (2), and (4))	February 11, 2023
SWCAA 400-040(1)(a)	September 21, 1995	February 11, 2023
SWCAA 400-050	September 10, 2021 (excludes (3), (5), (6), and (7))	February 11, 2023
SWCAA 400-060	September 10, 2021	February 11, 2023
SWCAA 400-070	October 9, 2016 (excludes (2)(a), (3)(b), (5), (6), (7), (8)(c), (9), (10), (11), (12), (14); and (15)(c))	February 11, 2023
SWCAA 400-070(2)(a)	September 25, 1995	February 11, 2023

SWCAA Regulations	SIP Regulation Version Effective Date	SWCAA Regulation Version Effective Date
SWCAA 400-072	September 10, 2021 (except (5)(a)(ii)(B), (5)(d)(ii)(B), (5)(d)(iii)(A), (5)(d)(iii)(B), and all reporting requirements related to TAPs)	February 11, 2023
SWCAA 400-075	—	February 11, 2023
SWCAA 400-076	—	February 11, 2023
SWCAA 400-081	October 9, 2016	February 11, 2023
SWCAA 400-091	September 10, 2021	February 11, 2023
SWCAA 400-100	—	February 11, 2023
SWCAA 400-101	—	February 11, 2023
SWCAA 400-103	—	February 11, 2023
SWCAA 400-105	September 10, 2021 (excludes reporting requirements related to TAPs)	February 11, 2023
SWCAA 400-106	September 10, 2021 (except (1)(d)–(1)(g) and (2))	February 11, 2023
SWCAA 400-107	September 21, 1995	February 11, 2023
SWCAA 400-109	September 10, 2021 (except TAP emissions thresholds (3)(d), (3)(e)(ii), and (4))	February 11, 2023
SWCAA 400-110	September 10, 2021 (except (1)(d))	February 11, 2023
SWCAA 400-111	September 10, 2021 (except (7))	February 11, 2023
SWCAA 400-114	September 10, 2021	February 11, 2023
SWCAA 400-115	—	February 11, 2023
SWCAA 400-116	November 9, 2003	February 11, 2023
SWCAA 400-120	—	February 11, 2023
SWCAA 400-130	October 9, 2016	February 11, 2023
SWCAA 400-131	October 9, 2016	February 11, 2023
SWCAA 400-136	September 10, 2021	February 11, 2023
SWCAA 400-151	September 10, 2021	February 11, 2023
SWCAA 400-161	March 18, 2001	February 11, 2023
SWCAA 400-171	September 10, 2021 (except (2)(a)(xii))	February 11, 2023
SWCAA 400-200	October 9, 2016 [excludes (1)]	February 11, 2023
SWCAA 400-205	March 18, 2001	February 11, 2023
SWCAA 400-235	—	February 11, 2023
SWCAA 400-265	—	February 11, 2023
SWCAA 400-270	—	February 11, 2023
SWCAA 400 Appendix A	October 9, 2016	February 11, 2023
SWCAA 425	—	June 18, 2017
SWCAA 476	—	March 22, 2020

Air Discharge Permits (ADPs) listed in the table below were issued under state/local authority and a federally-approved new source review program; therefore, the terms of these permits are federally enforceable, unless otherwise identified. There are no additional Regulatory Orders or Prevention of Significant Deterioration (PSD) permits applicable to this facility.

Regulatory Orders and Permits	SIP Approval Date	Effective Date
ADP 95-1800R5	April 28, 2004	April 28, 2004

III. EMISSION UNIT IDENTIFICATION

The following emission units or processes and control equipment have been identified at the facility. The EU Number will be used throughout the remainder of the Permit to identify the emission unit or process and any associated control equipment.

EU No.	Generating Equipment/Activity	Emission Control Measure	CAM Applicable
EU1	Combustion Turbine / HRSG (1,700 MMBtu/hr)	NO_X: Low-NO_X Combustor System Selective Catalytic Reduction CO Oxidation Catalyst SO_2: Low Sulfur Fuel	No
EU2	Startup Boiler (103.5 MMBtu/hr)	NO_X: Low-NO_X Combustor System SO_2: Low Sulfur Fuel	No
EU3	Fuel Gas Heater (2.5 MMBtu/hr)	NO_X: Low-NO_X Combustor System SO_2: Low Sulfur Fuel	No
EU4	Emergency Generator (568 bhp)	SO_2: Low Sulfur Fuel	No
EU5	Emergency Fire Pump (110 bhp)	SO_2: Low Sulfur Fuel	No

IV. PERMIT PROVISIONS

P1. Credible Evidence

40 CFR 60.11
40 CFR 61.12
SWCAA 400-235 (*Local*)

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 will 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. Confidentiality of Records and Information

WAC 173-401-500(5)
WAC 173-401-620(2)(e)
SWCAA 400-270 (*Local*)

The Permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to SWCAA. Information submitted to the SWCAA that has not been identified as confidential at the time of submittal may not be classified as confidential at a later date. Requests for proprietary and confidential information will 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. [SWCAA 400-270]

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. [WAC 173-401-500(5)]

Upon request, the Permittee must also furnish to SWCAA 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 along with a claim of confidentiality. SWCAA will maintain confidentiality of such information in accordance with RCW 70A.15.2510. [WAC 173-401-620(2)(e)]

P3. Insignificant Emission Unit - Permit Revision

WAC 173-401-530(6)

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

P4. Standard Provisions

WAC 173-401-620(2)
SWCAA 400-103 (*Local*)

(a) *Duty to comply*. The Permittee must comply with all conditions of this Permit. Any Permit noncompliance constitutes a violation of RCW 70A.15 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 is not 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 must furnish to SWCAA, within a reasonable time, any information that the SWCAA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee must also furnish to SWCAA

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 along with a claim of confidentiality. SWCAA must maintain confidentiality of such information in accordance with RCW 70A.15.2510.

(f) *Permit fees*. The Permittee must pay fees in accordance with RCW 70A.15.2270 and SWCAA's fee schedule. Failure to pay fees in a timely fashion may subject the Permittee to civil and criminal penalties as prescribed in RCW 70A.15.3150, RCW 70A.15.3160, and SWCAA 400-103(9).

(g) *Emissions trading*. No Permit revision will 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 will 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 SWCAA 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 FCAA Section 505(b).

(j) *Permit continuation*. This Permit and all terms and conditions contained herein do 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) remains in effect until the renewal Permit has been issued or denied if a timely and complete application has been submitted.

P5. Federally Enforceable Requirements — WAC 173-401-625

All terms and conditions in a Permit, including any provisions designed to limit a source's potential to emit, are enforceable by the EPA and citizens under the FCAA.

Notwithstanding the above, any terms and conditions included in this Permit that are not required under the FCAA or under any of its applicable requirements are specifically designated as "*Local*" and 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.

P6. Permit Shield — WAC 173-401-640

Compliance with the conditions of this Permit is compliance with all applicable requirements that are specifically identified in this Permit as of the date of Permit issuance. Nothing in this Permit will alter or affect the following:

(a) The provisions of section 303 of the FCAA (emergency orders), including the authority of the EPA 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 the EPA to obtain information from a source pursuant to section 114 of the FCAA; and

(e) The ability of SWCAA to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70A.15.1030(20).

P7. 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 will 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.

P8. Permit Revocation — WAC 173-401-710(4)

SWCAA may revoke a Permit only upon the request of the Permittee or for cause. SWCAA will 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 will include an explanation of the basis for the proposed action and afford the Permittee/applicant an opportunity to meet with SWCAA prior to the authority's final decision. A revocation issued under WAC 173-401-710(4) 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.

P9. Changes not Requiring Permit Revision / Off Permit Changes — WAC 173-401-722 WAC 173-401-724

The Permittee may make changes 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 173-401-722 may or may not qualify for a Permit shield. Changes under WAC 173-401-724 do not qualify for a Permit shield.

P10. Reopening for Cause — WAC 173-401-730

This Permit must be reopened and revised under any of the following circumstances:

(a) Additional applicable requirements become applicable to a source with a remaining Permit term of 3 or more years. Such a reopening must 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 EPA, excess emissions offset plans will be deemed to be incorporated into the Permit;

(c) SWCAA or the EPA 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) SWCAA or the EPA determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this Permit must follow the same procedures as apply to initial Permit issuance and will affect only those parts of the Permit for which cause to reopen exists. Reopening under this section must not be initiated before a notice of such intent is provided to the source by SWCAA. Such notice must be made at least 30 days in advance of the date that the Permit is to be reopened, except that SWCAA may provide a shorter time period in the case of an emergency.

P11. Unavoidable Excess Emissions SWCAA 400-107(2)

The provisions of SWCAA 400-107 do not apply to federal standards, emission limits or standards contained in a PSD permit issued solely by EPA, or any event that causes a monitored exceedance of any relevant ambient air quality standard. Excess emissions determined to be unavoidable under the procedures and criteria below are violations of the applicable statute, rule, permit or regulatory order. The decision that excess emissions are unavoidable is made by the SWCAA.

Excess emissions determined by the SWCAA to be unavoidable are a violation subject to the SWCAA 400-230(3), (4) and (6), but not subject to civil penalty under SWCAA 400-230(2). In a federal enforcement action filed under 42 USC 7413 or 7604 the decision-making authority must determine what weight, if any, to assign to the SWCAA's determination that an excess emissions event does or does not qualify as unavoidable under the criteria in subsections (a) and (b) below.

(a) *Startup or shutdown.* Excess emissions due to an upset or malfunction during a startup or shutdown event must be treated as an upset or malfunction.
(b) *Upsets or malfunctions.* Excess emissions due to upsets or equipment malfunctions will be considered unavoidable provided the Permittee reports as required under of SWCAA 400-107(1) and adequately demonstrates that:
    (1) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
    (2) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
    (3) The operator took immediate and appropriate corrective action in a manner consistent with safety and 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;
    (4) Repairs were made in an expeditious fashion if the emitting equipment could not be shutdown during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions;
    (5) All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage;

(6) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible; and
(7) All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.

V. GENERAL TERMS AND CONDITIONS

G1. Asbestos — 40 CFR 61 Subpart M (§61.140); SWCAA 400-075 (*Local*); SWCAA 476 (*Local*)

The Permittee must 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.

G2. Chemical Accident Prevention — 40 CFR 68

The Permittee must 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. [40 CFR 68.10]

G3. Protection of Stratospheric Ozone — 40 CFR 82 Subpart B; 40 CFR 82 Subpart F

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

G4. 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, must promptly submit such supplementary facts or corrected information. In addition, an applicant must 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.

G5. Certification — WAC 173-401-520

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

G6. Inspection and Entry — WAC 173-401-630(2) SWCAA 400-105(2) and (3)

The Permittee must allow inspection and entry, upon presentation of credentials and other documents as may be required by law, by SWCAA or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a 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) Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Permit or applicable requirements.

G7. Schedule of Compliance — WAC 173-401-630(3)

The Permittee must continue to comply with all applicable requirements with which the source is currently in compliance. The Permittee must meet on a timely basis any applicable requirements that become effective during the Permit term. The Permittee must comply with any approved schedule of compliance in accordance with WAC 173-401-510(2)(h)(iii).

G8. Permit Renewal Application — WAC 173-401-710(1) WAC 173-401-610

The Permittee must submit a complete Permit renewal application to SWCAA no later than the date established in the Permit. Permit expiration terminates the Permittee'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 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.

This Permit expires on **[*Expiration Date*]**. A renewal application is due on **[*Expiration date minus 12 months*]** and a complete application is due no later than **[*Expiration date minus 6 months*]**.

G9. Transfer of Ownership or Operational Control — WAC 173-401-720(1)(d)

An Administrative Permit Amendment is required for a change in ownership or operational control of a source where the SWCAA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the SWCAA.

G10. Reporting of Emissions of Greenhouse Gases — WAC 173-441 (*Local*)

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 of carbon dioxide equivalent (CO_2e) or more per calendar year. The Permittee must prepare and submit greenhouse gas reports to Ecology for each affected facility in accordance with WAC 173-441.

G11. Misrepresentation and Tampering — SWCAA 400-105(5) and (6)

The Permittee must not make any false material statement, representation or certification in any form, notice, or report required under RCW 70A.15, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.

The Permittee must not render inaccurate any monitoring device or method required under RCW 70A.15, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

G12. Emission Testing and Monitoring — SWCAA 400-106

SWCAA may conduct or require that emission testing be conducted of any "source" or emission unit within SWCAA's jurisdiction to determine compliance, evaluate control equipment performance, evaluate RACT, or quantify emissions.

The Permittee must provide the necessary platform and sampling ports for SWCAA personnel or others to perform a test of an emission unit. SWCAA must be allowed to obtain a sample from any emission unit. The Permittee must be given an opportunity to observe the sampling and to obtain a sample at the same time.

G13. Portable Sources — SWCAA 400-036, SWCAA 400-110(6)

Portable sources which locate temporarily at the site a source are allowed to operate at the temporary location without filing an ADP application provided that:

(a) The source/emissions units are registered with SWCAA;
(b) The source/emissions units have an ADP to operate as a portable source;
(c) The owner(s) or operator(s) notifies SWCAA of the intent to operate at the new location at least ten business days prior to starting the operation;
(d) The owner(s) or operator(s) supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source, and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards; and

(e) Portable sources that do not have a valid ADP issued by SWCAA, but do have a valid approval issued by a Washington air pollution control authority after July 1, 2010, may operate within SWCAA jurisdiction without filing an ADP application pursuant to SWCAA 400-109 or obtaining an ADP pursuant to SWCAA 400-110 provided the requirements of SWCAA 400-036 are met.

G14. New Source Review **WAC 173-400-117**
WAC 173-400-720
WAC 173-460 (*Local*)
SWCAA 400-072
SWCAA 400-076 (*Local)*
SWCAA 400-109
SWCAA 400-110
SWCAA 400-820

The Permittee must submit an application and approval must be issued or written confirmation of exempt status must be received before commencing construction of the proposed installations, modifications, changes, or alternations. Alternatively, for sources meeting the category criteria in SWCAA 400-072, the Permittee may submit a Small Unit Notification and begin installation after SWCAA has confirmed compliance with the provisions of SWCAA 400-072 in writing. Portable sources may be exempt from this requirement if they fulfill the criteria described in G13.

G15. Replacement or Substantial Alteration of Emission Control Technology at an Existing Stationary Source **SWCAA 400-114**

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

G16. 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, such as an ADP, must be maintained and operate in good working order. SWCAA 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.

G17. Pollution Control Equipment SWCAA 400-116(2)

Any equipment that serves as air contaminant control or capture equipment must be maintained and operate in good working order at all times in accordance with good operations and maintenance practices and in accordance with SWCAA's approval conditions. SWCAA 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.

G18. Adjustment for Atmospheric Conditions SWCAA 400-205

Varying the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant is prohibited, except as directed according to air pollution episode regulations as specified at SWCAA 400-230(5).

G19. Outdoor Burning SWCAA 425 (*Local*)

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

VI. OPERATING TERMS AND CONDITIONS

The following table lists federal, state, and locally enforceable requirements applicable to the Permittee. The effective date for each applicable requirement is listed in Section II, which also describes the enforceability of the term. Those specific requirements that are enforceable only by SWCAA are denoted with "*Local*". Any requirement with "Facility-wide" listed in the Emission Unit column, applies universally to all emission units or activities, regardless of whether identified as an EU or an IEU. Monitoring requirements are used to provide a reasonable assurance of compliance with the applicable requirements and may or may not involve the use of a reference test method.

Req.	Requirement	Emission Unit	Monitoring
Req 1	Permittee must not cause or permit the emission of an air contaminant that exceeds 20% opacity for more than three minutes (aggregate), in any one hour period except as provided in SWCAA 400-040(1). Reference Method: SWCAA Method 9 [SWCAA 400-040(1)]	Facility-wide	M3
Req 2	Permittee must 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) – *Local Only*]	Facility-wide	M4

Req.	Requirement	Emission Unit	Monitoring
Req 3	Permittee must 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)]	Facility-wide	M4
Req 4	Operations that cause or contribute to a nuisance odor must use recognized good practice and procedures to reduce these odors to a reasonable minimum. [ADP 95-1800R5 Condition 7] [SWCAA 400-040(4) - *Local Only*]	Facility-wide	M4 M5
Req 5	Permittee must not cause or permit the emission of any air contaminant detrimental to persons, property or business. [SWCAA 400-040(5)]	Facility-wide	M5
Req 6	Permittee must 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% O_2 or 12% CO_2 as required by the applicable emission standard for combustion sources, and based on the average of sixty (60) consecutive minutes. Reference Method: 40 CFR 60 Appendix A, Method 6 [SWCAA 400-040(6)]	Facility-wide	M7 M12 M14 M15
Req 7	Permittee must not cause or permit the installation or use of any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040. [SWCAA 400-040(7)]	Facility-wide	M16
Req 8	Permittee must take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions. [SWCAA 400-040(8)(a)]	Facility-wide	M4
Req 9	Permittee must not cause or permit emissions of particulate matter from a combustion or incineration emission unit in excess of 0.1 gr/dscf of exhaust gas corrected to appropriate oxygen level. Reference Method: 40 CFR 60 Appendix A, Method 5 [SWCAA 400-050(1)]	Facility-wide	M4

Req.	Requirement	Emission Unit	Monitoring
Req 10	Permittee must not cause or allow emissions of particulate matter from a general process unit in excess of 0.1 gr/dscf of exhaust gas. Reference Method: 40 CFR 60 Appendix A, Method 5 [SWCAA 400-060]	Facility-wide	M4
Req 11	Permittee must perform all abrasive blasting with sand inside a blasting booth, enclosure, or structure designed to capture fugitive particulate matter. Outdoor blasting must be performed with either steel shot or abrasive containing less than 1% (by mass) material that will pass through a No. 200 sieve. [SWCAA 400-070(8)(a) & (b)]	Facility-wide	M4
Req 12	Plantwide NO_X emissions must not exceed 97.0 tons during any 12 consecutive month period. [ADP 95-1800R5 Condition 1]	Facility-wide	M8 M12 M14 M15
Req 13	Plantwide CO emissions must not exceed 88.0 tons during any 12 consecutive month period. [ADP 95-1800R5 Condition 1]	Facility-wide	M8 M12 M14 M15
Req 14	Plantwide SO_2 emissions must not exceed 42.0 tons during any 12 consecutive month period. [ADP 95-1800R5 Condition 1]	Facility-wide	M7 M12 M14 M15
Req 15	Plantwide PM emissions must not exceed 79.5 tons during any 12 consecutive month period. [ADP 95-1800R5 Condition 1]	Facility-wide	M7 M12 M14 M15
Req 16	Plantwide VOC emissions must not exceed 29.5 tons during any 12 consecutive month period. [ADP 95-1800R5 Condition1]	Facility-wide	M7 M12 M14 M15
Req 17	Plantwide NH_3 emissions must not exceed 93.0 tons during any 12 consecutive month period. [ADP 95-1800R5 Condition 1]	Facility-wide	M7

Req.	Requirement	Emission Unit	Monitoring
Req 18	Air pollutant exhaust points must not be equipped with a rain protection cap that inhibits vertical discharge during operation. [ADP 95-1800R5 Condition 9]	EU1 EU2 EU3 EU4 EU5	M16
Req 19	Each pollution control device must be operated whenever the processing equipment served by that control device is in operation. Control devices must be operated and maintained in accordance with the manufacturer's specifications. Furthermore, control devices must be operated in a manner that minimizes emissions. [ADP 95-1800R5 Condition 8]	EU1 EU2 EU3 EU4 EU5	M16
Req 20	Permittee must 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	M16
Req 21	Permittee must 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	M16
Req 22	Exhaust gases from the Combustion Turbine must be discharged vertically at a minimum height of 198 feet above ground level. [ADP 95-1800R5 Condition 11]	EU1	M16
Req 23	NO_X emissions from the Combustion Turbine must 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	M6 M8 M10

Req.	Requirement	Emission Unit	Monitoring
Req 24	CO emissions from the Combustion Turbine must 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	M6 M8 M10
Req 25	SO_2 emissions from the Combustion Turbine must not exceed 51.1 lb/hr (1-hr avg). Reference Method: Mass Balance [ADP 95-1800R5 Condition 3]	EU1	M6 M7
Req 26	PM (filterable) emissions from the Combustion Turbine must not exceed 9.0 lb/hr (1-hr avg). Reference Method: 40 CFR 60 Appendix A, Method 5 [ADP 95-1800R5 Condition 3]	EU1	M6 M7
Req 27	VOC emissions from the Combustion Turbine must not exceed 6.6 lb/hr (1 hr avg). Reference Method: 40 CFR 60 Appendix A, Method 25A [ADP 95-1800R5 Condition 3]	EU1	M6 M7
Req 28	NH_3 emissions from the Combustion Turbine must not exceed: 22.9 lb/hr (1 hr avg); and 10.0 ppmvd @ 15% O_2 (1 hr avg). Reference Method: BAAQMD Method ST-1B [ADP 95-1800R5 Condition 3]	EU1	M6 M7 M10
Req 29	The short-term emission limits identified in Reqs 23 through 28 (i.e., limits with an averaging time of 24 hr or less) do 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, must applicability of short-term emission limits be suspended for greater than 12 hours during a startup or 4 hours during a shutdown. [ADP 95-1800R5 Condition 3]	EU1	M9

Req.	Requirement	Emission Unit	Monitoring
Req 30	Visible emissions from the Combustion Turbine must not exceed 5% for more than three minutes (aggregate) in any 1-hour period. Reference Method: SWCAA Method 9 (SWCAA 400, Appendix A) [ADP 95-1800R5 Condition 2]	EU1	M3
Req 31	Permittee must not fire any fuel in the Combustion Turbine which contains sulfur in excess of 0.8% by weight. Reference Method: ASTM D1072, D 2880-71, D3031-81, D 4084-82, or D 3246-81 [40 CFR 60.333(b)] [SWCAA 400-115] [ADP 95-1800R5 Condition 12]	EU1	M7
Req 32	Only aqueous ammonia must be stored, handled and injected in the Combustion Turbine's ammonia injection system. Anhydrous ammonia must not be used. The amount of ammonia stored onsite for use in the ammonia injection system must not exceed 19,500 lbs. [ADP 95-1800R5 Conditions 13 & 14]	EU1	M11
Req 33	Permittee must: (1) hold SO_2 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 SO_2 for the previous calendar year from the affected units at the source; and (2) comply with the applicable Acid Rain emissions limitation for SO_2. [40 CFR 72.9(c)(1)] [WAC 173-406-106(3)(a)(i)]	EU1	M16
Req 34	Exhaust gases from the Startup Boiler must be discharged vertically at a minimum height of 83 feet above ground level. [ADP 95-1800R5 Condition 11]	EU2	M16
Req 35	NO_X emissions from the Startup Boiler must not exceed 4.3 lb/hr. Reference Method: EPA Method 7E (40 CFR 60, App. A) [ADP 95-1800R5 Condition 4]	EU2	M12 M13
Req 36	CO emissions from the Startup Boiler must not exceed 6.3 lb/hour. Reference Method: EPA Method 10 (40 CFR 60, App. A) [ADP 95-1800R5 Condition 4]	EU2	M12 M13

Req.	Requirement	Emission Unit	Monitoring
Req 37	SO_2 emissions from the Startup Boiler must not exceed 2.9 lb/hour. Reference Method: EPA Method 6C (40 CFR 60, App. A) [ADP 95-1800R5 Condition 4]	EU2	M12
Req 38	PM (filterable) emissions from the Startup Boiler must not exceed 1.4 lb/hour. Reference Method: EPA Method 5 (40 CFR 60, App. A) [ADP 95-1800R5 Condition 4]	EU2	M12
Req 39	VOC emissions from the Startup Boiler must not exceed 0.2 lb/hour. Reference Method: EPA Method 25A (40 CFR 60, App. A) [ADP 95-1800R5 Condition 4]	EU2	M12
Req 40	Visible emissions from the Startup Boiler must 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	M3
Req 41	The annual capacity factor of the Startup Boiler must not exceed 10%. [40 CFR 60.44b(j)&(k)] [ADP 95-1800R5 Condition 15]	EU2	M12
Req 42	NO_X emissions from the Fuel Gas Heater must not exceed 1.3 tpy. Reference Method: EPA Method 7E (40 CFR 60, App. A) [ADP 95-1800R5 Condition 5]	EU3	M14
Req 43	CO emissions from the Fuel Gas Heater must not exceed 1.0 tpy. Reference Method: EPA Method 10 (40 CFR 60, Appendix A) [ADP 95-1800R5 Condition 5]	EU3	M14
Req 44	PM (filterable) emissions from the Fuel Gas Heater must not exceed 0.1 tpy. Reference Method: EPA Method 5 (40 CFR 60, App. A) [ADP 95-1800R5 Condition 5]	EU3	M14

Req.	Requirement	Emission Unit	Monitoring
Req 45	VOC emissions from the Fuel Gas Heater must not exceed 0.4 tpy. Reference Method: EPA Method 25A (40 CFR 60, App. A) [ADP 95-1800R5 Condition 5]	EU3	M14
Req 46	Visible emissions from the Fuel Gas Heater must 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	M3
Req 47	Operation of the Emergency Generator for the purposes of testing and maintenance must not exceed 24 hr/yr. This limit does not apply to emergency service during actual power outages. [ADP 95-1800R5 Condition 16]	EU4	M15
Req 48	Operation of the Emergency Fire Pump for the purposes of testing and maintenance must 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]	EU5	M15
Req 49	Operation of emergency engines for purposes other than those described below is prohibited. (a) Emergency engines may operate without limit in response to emergency situations. (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. (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. [40 CFR 63.6640(f)]	EU4 EU5	M15

Req.	Requirement	Emission Unit	Monitoring
Req 50	Permittee must equip each emergency engine with a non-resettable hour meter. [40 CFR 63.6625(f)]	EU4 EU5	M16
Req 51	Permittee must 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. [40 CFR 63.6625(h), Table 2c]	EU4 EU5	M15
Req 52	Emergency engines must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions. Emergency engines must 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 each unit in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6605(b), 63.6625(e)] [40 CFR 63.6640(a), Table 6]	EU4 EU5	M15
Req 53	Permittee must conduct the following maintenance for each emergency engine: (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. [40 CFR 63.6603(a), Table 2d] [40 CFR 63.6640(a)]	EU4 EU5	M15

VII. MONITORING AND RECORDKEEPING TERMS AND CONDITIONS

The Permittee must conduct each of the monitoring and recordkeeping activities listed below. All monitoring information required by this Permit must be recorded and readily available on-site for inspection. [WAC 173-401-615(2)]

All records and supporting information required by this Permit must be kept for a minimum period of no less than five years and must be maintained in a form readily available for inspection by SWCAA representatives. [WAC 173-401-615(2)(c)]

Pursuant to WAC 173-401-530(2)(c), the following monitoring or recordkeeping requirements do not apply to IEUs unless specified.

M1. General Recordkeeping

WAC 173-401-615(1) & (2)
ADP 95-1800R5 Conditions 18-20

Except for data recorded by an automated system, each record required by this Permit must include, at a minimum, the date and the name of the person making the record entry. For those records required for a control device or process, if the control device or process is not operating during a specific time period, a record must be made to that effect.

The Permittee must 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) Description of the complaint;
  (4) Date and time of follow-up inspection;
  (5) The name and title of the person who conducted the follow-up inspection; and
  (6) Description of corrective action (if any) taken in response to complaint.

(c) Sampling and Emissions Testing
  (1) Date sampling was performed;
  (2) Entity that performed the sampling;
  (3) Name and title of the person or the entity that performed the sampling or testing;
  (4) Techniques or methods used to take the sample;
  (5) Operating conditions existing at the time of sampling or measurement;
  (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 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 Permit Deviations
(1) Date and time of excess emission or Permit deviation occurred;
(2) Description of the excess emission or Permit deviation 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/company who performed the maintenance;
(3) Identification of the unit or activity being maintained; and
(4) Description of the maintenance being conducted.

(g) Changes at Source
(1) Date changes were made to the source that resulted in emissions of a regulated air pollutant but not otherwise regulated under the Permit;
(2) Description of the changes made to the source; and
(3) Quantity of emissions resulting from the changes.

M2. Continuous Emission Data Recordkeeping **40 CFR 75.57 - 75.59**
WAC 173-401-615(2)
ADP 95-1800R5 Conditions 21 & 22

The Permittee must maintain a file for the Combustion Turbine containing the measurements, data, reports, and general information identified below. The file must 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 must 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;
(5) The quality control plan as described in 40 CFR 75, Appendix B; and
(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 must 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_{ge});
(4) Total turbine heat input (million Btu);
(5) Combustion Turbine fuel consumption (MMBtu/hr);
(6) Average NOx concentration (ppmvd @ 15%O_2);
(7) Average NOx emission rate (lb/million Btu and lb/hr);
(8) Average CO concentration (ppmvd @ 15%O_2);
(9) Average CO emission rate (lb/hr); and
(10) Average O_2 concentration (% O_2).

M3. Visible Emission Monitoring WAC 173-401-615(1)

On a monthly basis, the Permittee must 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 must take one or more of the following actions:

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

(b) If visible emissions are observed, the Permittee must 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 must take corrective action to resolve the problem within 24 hours of initial discovery, and must notify SWCAA regarding its progress in resolving the problem.

(c) Subsequent to taking corrective action, the Permittee must 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 must 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 must report an excess emission as described in Section R1 and make a record of the event. Additional adjustments, repairs, and/or maintenance must 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 relieve the Permittee from the obligation of reporting Permit deviations as specified in WAC 173-401-615(3).

M4. Fugitive Emissions and Fallout Monitoring WAC 173-401-615(1)

On a monthly basis, or in response to a complaint, the Permittee must 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 must 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 must 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 must 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 must 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 must be made. If visible emissions, odor or fallout are still observed, the Permittee must 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 must 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).

M5. Complaint Log and Investigation WAC 173-401-615(1)

The Permittee must record, and maintain record of, any air quality related complaints received by either the Permittee or SWCAA. All complaints must be investigated no later than (1) work day after the Permittee has been notified. The Permittee must 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 investigation, the Permittee must resolve the subject of the complaint, or notify SWCAA by the next working day of progress made in resolving the complaint.

Complaint records must include:

(a) The date and time of the complaint;
(b) The name of the complainant (if provided);
(c) The nature of the complaint;
(d) The date and time of the follow-up inspection; and
(e) Any corrective action taken in response to complaints and when such action was initiated.

Implementation of corrective action does not relieve the Permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

M6. Combustion Turbine Operations Monitoring — **40 CFR 75; ADP 95-1800R5 Conditions 22, 25**

The Permittee must 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 (lb/hr);
(k) Average hourly NO_x and CO emission concentration (ppmvd @ 15% O_2); and
(l) Average hourly O_2 concentration (dry volume percent).

M7. Combustion Turbine General Emissions Monitoring — **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**

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

Hourly SO_2 emission rates must 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, SO_2 emissions must 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 NH_3 emissions must be calculated from contemporaneous heat input values and the most recent emission test data for the Combustion Turbine.

Daily CO_2 emission rates (ton/dy) must be calculated using the procedures specified in 40 CFR 75.10(a)(3).

M8. Combustion Turbine NO_X and CO Emissions Monitoring — **40 CFR 60, App B & F; 40 CFR 75; WAC 173-406-106(2); ADP 95-1800R5 Conditions 21, 30**

A CEMS/DAHS for NO_X and O_2 must be installed and maintained in accordance with the requirements and specifications found in 40 CFR 75 – Continuous Emissions Monitoring. Average

hourly NO_X and O_2 emission concentration (ppmv, dry volume percent) must be recorded. Hourly NO_X emission rates (lb/MMBtu) must be calculated based on the monitored NO_X concentration (ppmv) and diluent concentration (dry volume percent O_2) in accordance with the procedures in 40 CFR 75, Appendix F. Hourly NO_X emissions (lb/hr) must be calculated using the calculated NO_X emission rate and the average hourly heat input to the turbine.

A CEMS/DAHS for CO must 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". Average hourly CO emission concentration (ppmv) must be recorded. Hourly CO emission rates (lb/MMBtu) must be calculated based on the monitored CO concentration (ppmv) and diluent concentration (dry volume percent O_2) in accordance with Equation 19-1 from 40 CFR Part 60 Appendix A. Hourly CO emissions (lb/hr) must be calculated using the calculated CO emission rate and the average hourly heat input to the turbine.

Hourly emission averages must be based on discrete CEM clock hours (block average). Relative accuracy test audits (RATA) must be conducted for each CEMS as specified in the applicable performance specification.

Combustion Turbine
M9. Startup and Shutdown Emissions **ADP 95-1800R5 Conditions 3, 22, 25(d)**

Turbine startup and shutdown periods must be clearly identified and recorded in the facility's DAHS. Emissions during the startup and shutdown events must be determined from CEMS data if emissions are within the measurement range of the CEMS. If validated CEMS data is not available, emissions must 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 **ADP 95-1800R5 Condition 29**
M10. Emission Testing **ADP 95-1800R5 Appendix A**

The Combustion Turbine must be emission tested for NO_X, CO and NH_3 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 must be corrected to units that correspond to the emission limitations contained in this permit. Tested NO_X concentrations must also be corrected to 15% O_2.

Combustion Turbine
M11. Ammonia Concentration Monitoring **ADP 95-1800R5 Condition 24**

The Permittee must 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)**
M12. Operations Monitoring **ADP 95-1800R5 Condition 26**

The Permittee must 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 must be made at the end of each calendar month. The annual capacity factor of the Startup Boiler must 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 must be calculated from recorded heat input and the most recent emission test data. Emission calculations must use the following equation:

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

Monthly emissions of PM, VOC, and SO_2 must be calculated based on recorded fuel consumption and the following emission factors:

Pollutant	Emission Factor	
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
M13. Emission Testing **ADP 95-1800R5 Conditions 32, 38**

The Startup Boiler must 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 must be corrected to dry standard conditions at 3% O_2. Emission rates of NO_X and CO (lb/MMBtu) must be calculated based on the tested constituent concentration (ppmv) and diluent concentration (in percent O_2 or CO_2) in accordance with Equation 19-1 from 40 CFR Part 60 Appendix A.

Fuel Gas Heater
M14. Operations Monitoring **ADP 95-1800R5 Condition 27**

The Permittee must 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 must be calculated based on recorded fuel consumption and the following emission factors:

Pollutant	Emission Factor
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**

M15. Operations Monitoring **ADP 95-1800R5 Condition 28**

The Permittee must 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 must be recorded from the non-resettable hour meter. The Permittee must document how many hours are spent for emergency and nonemergency operation, including what classified the operation as emergency.

Monthly emissions from the Emergency Generator (568 bhp) and the Emergency Fire Pump (110 bhp) must be calculated from recorded hours of operation, the horsepower rating of each engine, and the following emission factors from AP-42, Table 3.3-2 (5/95):

Pollutant	Emission Factor
NO_X	0.031 lb/hp-hr
CO	6.68E-3 lb/hp-hr
PM	2.20E-3 lb/hp-hr
VOC	2.47E-3 lb/hp-hr
SO_2	2.05E-3 lb/hp-hr

M16. Compliance Certification **WAC 173-401-615(1)**

The Permittee must certify the following in each semi-annual report:

(a) The facility has not installed or used any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040;

(b) Air pollutant exhaust points are not equipped with rain protection caps that inhibit vertical discharge during operation;

(c) Each pollution control device is operated whenever the processing equipment served by that control device is in operation, operated and maintained in accordance with the manufacturer's specifications, and operated in a manner that minimizes emissions;

(d) Equipment is maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions;

(e) Only natural gas is fired in the Combustion Turbine, Startup Boiler, and Gas Heater;

(f) Exhaust gases from the Combustion Turbine are discharged vertically at a minimum height of 198 feet above ground level;
(g) The facility holds SO_2 Acid Rain allowances not less than the total annual emissions of SO_2 for the previous calendar year from the affected units at the source and complies with applicable Acid Rain emissions limitation for SO_2;
(h) Exhaust gases from the Startup Boiler are discharged vertically at a minimum height of 83 feet above ground level; and
(i) Each emergency engine is equipped with a non-resettable hour meter.

M17. Greenhouse Gas Emission Monitoring WAC 173-441-050

The Permittee must monitor greenhouse gas emissions by maintaining a record of applicable data elements specified in WAC 173-441-050(6)(a)-(h). Records must be kept in a form suitable for expeditious inspection and review. Upon request, records required under this section must be made available to Ecology. Records may be retained offsite if the records are readily available for expeditious inspection and review. For records that are electronically generated or maintained, the equipment or software necessary to read the records must be made available, or, if requested by Ecology, electronic records must be converted to paper documents.

Affected monitoring systems must meet the applicable flow meter calibration and accuracy requirements of WAC 173-441-050(8). The accuracy specifications in that subsection do not apply where the use of company records (*defined in WAC 173-441-020(3)*) or the use of "best available information" is specified in an applicable subsection of WAC 173-441 to quantify fuel usage and/or other parameters.

Greenhouse gas emissions must be calculated using the methodologies specified in relevant sections of WAC 173-441. The same calculation methodology must be used throughout a reporting period unless a written explanation of why a change in methodology was required is provided.

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

Where a reporting schedule is specified (e.g., quarterly, semiannual, or annual), compliance with the reporting frequency is met when reports are submitted more frequently than required.

Each report that is required to be submitted to the Department of Ecology or the EPA must also be submitted to SWCAA by the deadline specified in the applicable requirement for that report. For submissions made electronically to an EPA database, the copy to SWCAA must be in a format approved by SWCAA. [WAC 173-401-615(3)]

All reports required by this Permit, and the supporting information for those reports, must be kept for a minimum period of no less than five years from the date of the report and must be maintained in a form readily available for inspection by SWCAA representatives. [WAC 173-401-615(2)(c)]

Addresses of regulatory agencies are the following, unless otherwise instructed:

Southwest Clean Air Agency
11815 NE 99th Street, Suite 1294
Vancouver, WA 98682-2322

Clean Air Act Compliance Manager
US EPA Region 10, Mail Stop: OCE-101
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

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

Acid Rain Program address, unless otherwise instructed:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue, NW
Mail Code 6204J
Washington, DC 20460

R1. Deviations from Permit Conditions **40 CFR 60.7(b)**
40 CFR 64.9(a)(2)(i)
WAC 173-401-615(3)
SWCAA 400-107 (*Local*)
ADP 95-1800R5 Conditions 34, 35

The Permittee must 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 must be reported as soon as possible but no later than twelve hours after the deviation is discovered.

Excess emissions must 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 must be submitted in writing (e.g. e-mail, facsimile or letter). Each report must 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.

R2. Complaint Reports **WAC 173-401-630(1)**
ADP 95-1800R5 Condition 37

The Permittee must report all air pollution related complaints to SWCAA within 3 business days of receipt. Complaint reports must include the following information:
(a) Date and time of the complaint;
(b) Name of the complainant;
(c) Nature of the complaint; and
(d) Description of action taken in response to complaint (if any).

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

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

R4. Quarterly Reports **40 CFR 75.64, 75.65**
WAC 173-401-615(3)
ADP 95-1800R5 Condition 36

General Information. The Permittee must 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 must 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) must 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 M2.(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 must electronically report the data and information identified below in accordance with 40 CFR 75.64 and 75.65. Excess visible emissions must be reported to SWCAA in accordance with 75.65. Each electronic report must be submitted to the EPA Administrator within 30 days following the end of each calendar quarter and must 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 SO_2 emitted during the quarter and cumulative SO_2 emissions for the calendar year;
(o) Tons of CO_2 emitted during the quarter and cumulative CO_2 emissions for the calendar year; and
(p) Total heat input (million Btu) for the quarter and cumulative heat input for the calendar year.

R5. Semi-annual Reports

40 CFR 63.6650(f)
WAC 173-401-615(3)

Consistent with WAC 173-401-615(3) the Permittee must 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 must be clearly identified. If no deviations occurred, then a statement to that effect must be submitted.

The semi-annual report must contain a certification of all reports previously submitted during the semi-annual period that have not already been certified. The certification must 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.

R6. Annual Compliance Certification

40 CFR 72.90
40 CFR 75.60
WAC 173-401-615(1)(b)
WAC 173-401-630(5)

The Permittee must submit to SWCAA and EPA a certification of compliance with all terms and conditions of this Permit, not including the items listed in Section IV ("Permit Provisions"), in accordance with WAC 173-401-630(5)(d). The Permittee must submit the following information by March 15th for the previous calendar year:

(a) Identification of each term or condition of the permit that is the basis of the certification;
(b) Statement of compliance status;
(c) Whether compliance was continuous or intermittent;

(d) Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615;
(e) Such other facts as SWCAA may require to determine the compliance status of the source; and
(f) Such additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the FCAA.

R7. Emission Inventory Reports **WAC 173-400-105(1)**
SWCAA 400-105
ADP 95-1800R5 Condition 33

The Permittee must 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 must include stack and fugitive emissions of NO_X, SO_2, CO, VOC, PM, PM_{10}, $PM_{2.5}$, hazardous air pollutants, and toxic air pollutants as defined in WAC 173-460. TAP emissions must be calculated consistent with the emission factors and methodology presented in the Technical Support Document for ADP 95-1800R5.

Each inventory report must be certified by a responsible official consistent with WAC 173-520.

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

The Permittee must report the results of each fuel sulfur sampling to SWCAA within 45 days of test completion. Each test report must include:
(a) Time and date of the fuel sampling;
(b) A summary of sampling results. Fuel sulfur content results must, 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.

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

The Permittee must do the following for each emission test or RATA:
(a) Submit a comprehensive test plan to SWCAA for review and approval at least ten business days prior to testing;
(b) Notify SWCAA at least five business days in advance of 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 must, as a minimum, be reported in parts per million by volume, pounds per hour, and pounds per million Btu of heat input. Emissions data must be corrected to units that correspond to the applicable standard. Each required source test report must 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 Permittee or designated representative must 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 must submit applications and reports in accordance with 40 CFR 75.63.

R11. Greenhouse Gas Emission Reports WAC173-441-050

The Permittee must prepare and submit an annual report of greenhouse gas (GHG) emissions to Ecology and SWCAA by March 31st of the following calendar year. Each annual report must contain the information specified in WAC 173-441-050(3). The Permittee must submit a revised annual report within 45 days of discovering that a previously submitted annual report contains one or more substantive errors.

The report and certificate or representation must be submitted in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology. Each annual report and any other submission under Chapter 173-441 WAC must be certified, signed, and submitted by the designated representative or any alternate designated representative.

Each submission under Chapter 173-441 WAC must include the following certification statement signed by the designated representative or any alternate designated representative:

> *"I am authorized to make this submission on behalf of the owners and operators of the facility or supplier, as applicable, 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."

IX. NON-APPLICABLE REQUIREMENTS WAC 173-401-640(2)

This section lists all federal, state, and/or local requirements that might reasonably apply to the Permittee, but are deemed non-applicable after review by SWCAA. In accordance with WAC 173-401-640, the Permittee is provided a Permit shield for not complying with the requirements described below where they have been identified to be non-applicable to specific emission units. Certain subsections describe requirements that may apply to the Permittee but are not "applicable requirements" for the purposes of the Air Operating Permit program and therefore will not be included in an Air Operating Permit.

N1. Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units — 40 CFR 60, Subpart Db

Subpart Db establishes NO_X, SO_2, PM and opacity standards for industrial-commercial-institutional steam generating units with heat input capacities greater than 100 MMBtu/hr and installed after June 19, 1984. The Startup Boiler is an affected facility under this regulation, but is not subject to any active emission limits as detailed below.

Pursuant to 40 CFR 60.42b(k)(1), no SO_2 emission limit is applicable to the Startup Boiler because it combusts natural gas only and was constructed prior to 2/28/05.

Pursuant to 40 CFR 60.43b, there are no PM or opacity emission limits applicable to the Startup Boiler because it combusts natural gas only.

Pursuant to 40 CFR 60.44b(k), the Startup Boiler is not subject to a NO_X emission limit because it has a heat input capacity less than 250 MMBtu/hr and meets the criteria outlined in 40 CFR 60.44b(j) (combusts natural gas only, annual capacity factor $\leq$ 10%).

N2. Standards of Performance for Stationary Compression 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.

N3. Standards of Performance for Stationary Combustion 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.

N4. National Emission Standards for Hazardous Air Pollutants 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.

N5. National Emission Standards for Hazardous Air Pollutants 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.

N6. National Emission Standards for Hazardous Air Pollutants 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.

N7. National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, 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.

N8. National Emission Standards for Hazardous Air Pollutants for Area Sources: 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.

N9. Compliance Assurance Monitoring — 60 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. Pursuant to 40 CFR 64.2, the Compliance Assurance Monitoring (CAM) rule applies to Pollutant Specific Emission Units (PSEU) at major sources that are required to obtain a Part 70 or 71 permit and meet all of the following criteria:

1) The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate);
2) The PSEU uses a control device to achieve compliance with the emission limit or standard; and
3) The PSEU has potential pre-control device emissions of the applicable regulated pollutant equal to or above the major source threshold.

As discussed in Section II of the Basis Statement for this Permit, the CAM rule does not apply to any of the emission units at this facility.

N10. Greenhouse Gas Emission Reports — 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 98.3, 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. According to EPA guidance as published in the Federal Register (56288 FR 74:209, October 30, 2009), the requirements imposed by this rule are not applicable requirements under the Title V program. Therefore, the requirements of 40 CFR 98 are not appropriate for inclusion in an AOP.

N11. Carbon Dioxide Mitigation Program, Greenhouse Gases Emissions Performance Standard and Sequestration Plans And Programs for Thermal Electric Generating Facilities — 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, and Chapters 70.98 and 80.50 RCW. Chapter 173-407 WAC is intended to implement the provisions of Chapters 80.70 RCW and 80.80 RCW. Therefore, the requirements of Chapter 173-407 WAC are not appropriate for inclusion in an AOP.

N12. Clean Energy Transformation Rule — WAC 173-444

Chapter 173-444 WAC establishes rules that electric utilities must use to comply with parts of the Washington Clean Energy Transformation Act (CETA), chapter 19.405 RCW. The statutory authority for Chapter 173-444 WAC is Chapter 19.405 RCW and RCW 70A.45.010. Therefore, the requirements of Chapter 173-444 WAC are not appropriate for inclusion in an AOP.

N13. Climate Commitment Act Program Rule — WAC 173-446

Chapter 173-446 WAC implements the provisions of the GHG emissions cap and invest program created by RCW 70A.65.060 through 70A.65.210. The provisions of the cap and invest program implemented by this chapter establish a declining cap on GHG emissions from covered entities consistent with the limits established in RCW 70A.45.020, and a program to track, verify, and enforce compliance with the cap through the use of compliance instruments. The statutory authority for Chapter 173-446 WAC is RCW 70A.65.220. Therefore, the requirements of Chapter 173-446 WAC are not appropriate for inclusion in an AOP.

N14. Emission Standards for Combustion and Incineration Units — SWCAA 400-050(3)

SWCAA 400-050(3) prohibits emissions of carbonyls from any incinerator in excess of 100 ppm total carbonyls as measured by applicable sampling methods and restricts operating hours. Pursuant to SWCAA 400-030(58), an incinerator is defined as "...a furnace used primarily for the thermal destruction of waste." The primary purpose of the combustion turbine at this source is electric power generation not the destruction of waste. Therefore, this requirement is not applicable.

N15. 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.

N16. 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.

N17. 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.

N18. Bubble Rules — SWCAA 400-120

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

N19. Emission Reduction Credits — SWCAA 400-130, SWCAA 400-131, SWCAA 400-136

The cited rule sections govern the creation, maintenance, and use of emission reduction credits within the Agency's jurisdiction. The Permittee has not requested to create or use any emission reduction credits (ERCs). Therefore, this regulation is not applicable.

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 must be submitted to SWCAA for review and approval at least 10 business days prior to testing. SWCAA personnel must 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 must be conducted on a 12-month cycle, no later than the end of October each year.

c. **Test runs/Reference test methods.** Testing for each identified constituent pollutant must consist of at least three test runs of the specified duration. All sampling must be conducted at the outlet of the turbine/HRSG. Compliance with applicable emission limits must be demonstrated by averaging the results of individual test runs. The test methods identified below must 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).

Constituent	Reference Test Method	Minimum Test Run Duration
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 must be operated at loads greater than 95% for the duration of testing.

b. **Record of production parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. Recorded parameters must, at a minimum, include fuel input, turbine output, process startups and shutdowns, and plant adjustments. All recorded production parameters must 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 must 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 must be submitted to SWCAA for review and approval at least 10 business days prior to each test. SWCAA personnel must 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 must be conducted on a (5) year cycle, no later than the end of October of the respective year.

c. **Test runs/Reference test methods.** Testing for each identified constituent must consist of at least (3) sampling runs of the specified duration. All sampling must be conducted at the exhaust stack of the Startup Boiler. Compliance with applicable emission limits must be demonstrated by averaging the results of individual sampling runs. The test methods identified below must be used unless alternate methods are approved in writing by SWCAA in advance of the emission testing.

Constituent	Reference Test Method	Minimum Test Run Duration
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 must be operated at maximum achievable operating capacity for the duration of testing.

b. **Record of production parameters.** Production related parameters and equipment operating conditions must be recorded during emissions testing to correlate operating conditions with emissions. All recorded production parameters must be documented in the test results report. Recorded parameters must, at a minimum, include:

(1) Fuel consumption,
(2) Steam production, and
(3) Plant adjustments.

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 must be corrected to 3% oxygen.

APPENDIX C
Acid Rain Permit No. SW-ARP-2-R4

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-R4). The Acid Rain permit must 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) SO_2 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.

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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) SO_2 Allowance Allocations and NO_X Requirements

Affected Unit	Requirement	2023	2024	2025	2026	2027	2028
Turbine (Unit 1)	SO_2 Allowances	TBD[a,b]	TBD[a,b]	TBD[a,b]	TBD[a,b]	TBD[a,b]	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 SO_2 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 must 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 SO_2 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 Requirements

Permit Requirements

(1) The designated representative of the River Road Generating Plant and each affected unit at the River Road Generating Plant must:
   (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 must:
   (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 must 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 must 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 must 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 must:
   (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 must constitute a separate violation of the Act.

(3) An affected unit must 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 must be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance must 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 must 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 must 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 must 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 must:
   (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 must 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 must 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 must 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 must 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, must 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 must 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 must 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 must 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) must 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) must 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, must 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 must 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 must 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 February 28, 2023. A copy of the permit application is included below.

River Road Generating Plant

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 11/30/2012

Acid Rain Permit Application

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

This submission is: ☐ **New** ☐ **Revised** ☒ **for ARP permit renewal**

STEP 1

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

Facility (Source) Name	State	Plant Code
River Road Generating Plant	WA	07605

STEP 2

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

a	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
1	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

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).

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 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:
(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

STEP 3, Cont'd.

River Road Generating Plant

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;
(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.

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

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 Ty Toland	Date 2-28-23