

CONSOLIDATED SOAH DOCKET NO. 582-08-0861
TCEQ DOCKET NO. 2007-1820-AIR
TCEQ DOCKET NO. 2008-1210-AIR

APPLICATION OF § BEFORE THE STATE OFFICE
NRG TEXAS POWER, LLC, FOR §
STATE AIR QUALITY PERMIT §
79188 AND PREVENTION OF §
SIGNIFICANT DETERIORATION § OF
AIR QUALITY PERMIT PSD-TX- §
1072 AND HAZARDOUS AIR §
POLLUTANT MAJOR SOURCE §
[FCAA 112 § (g)] PERMIT HAP-14 § ADMINISTRATIVE HEARINGS

REVISED PERMIT CERTIFICATE OF SERVICE

I hereby certify that on this the 25th day of November, 2009, a true and correct copy of the Revised Permits 79188, PSD-TX-1072, and HAP-14 and cover letters have been filed with the Chief Clerk's Office of the Texas Commission on Environmental Quality and have been served on the following attached Service List via e-mail.

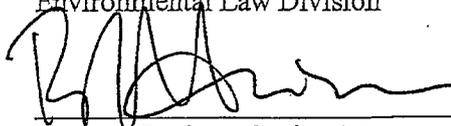
Respectfully Submitted,

Texas Commission on Environmental Quality

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CHIEF CLERK'S OFFICE
2009 NOV 25 11:32
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

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SOAH DOCKET NO. 582-08-0861

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

MR BEN C CARMINE PE
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NRG TEXAS POWER LLC
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HOUSTON TX 77010-3035

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
239 NOV 24 PM 4: 27
CHIEF CLERKS OFFICE

Re: Permit Application
Permit Numbers: 79188 and PSDTX1072
Limestone Electric Generating Station - Unit 3 Boiler
Jewett, Limestone County
Regulated Entity Number: RN100542927
Customer Reference Number: CN603207218
Account Number: LI-0027-L

Dear Mr. Carmine:

This is in response to your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the above referenced facility.

A permit for your new facility is enclosed. The permit contains several general and special conditions that define the level of operation and a maximum allowable emissions rates table (MAERT). We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met. In addition, the construction and operation of the facilities must be as represented in the application.

This permit authorizes planned startup and shutdown emissions as represented in the permit application for only the sources identified on the MAERT. Maintenance activities were not represented in the application and are not authorized and will need to be authorized separately in the future.

This permit will be automatically void upon the occurrence of any of the following, as indicated in Title 30 Texas Administrative Code § 116.120(a) [30 TAC § 116.120(a)]:

1. Failure to begin construction within 18 months of the date of issuance,
2. Discontinuance of construction for more than 18 months prior to completion, or
3. Failure to complete construction within a reasonable time.

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Upon request, the Texas Commission on Environmental Quality (TCEQ) Executive Director may grant extensions as allowed in 30 TAC § 116.120(b).

The limitations of 30 TAC § 116.120(a) do not apply to physical or operational changes allowed without an amendment under 30 TAC § 116.721 of this title (relating to Amendments and Alterations). [30 TAC § 116.715(c)(1)]

This permit is effective as of the date of this letter and will be in effect for ten years from the date of approval.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC §§ 25.4 and 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.state.tx.us.

If you need further information or have any questions, please contact Mr. Erik Hendrickson, P.E., at (512) 239-1095 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Bryan W. Shaw, Chairman
For the Texas Commission on Environmental Quality

Enclosures

cc: Air Section Manager, Region 9 - Waco

Mr. Ben C. Carmine, P.E.
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Re: Permit Numbers 79188 and PSDTX1072

Project Numbers: 123214 and 123218



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT



A PERMIT IS HEREBY ISSUED TO
NRG Texas Power LLC
AUTHORIZING THE CONSTRUCTION AND OPERATION OF
Limestone Electric Generating Station - Unit 3 Boiler
LOCATED AT Jewett, Limestone County, Texas
LATITUDE 31° 25' 23" LONGITUDE 096° 15' 11"

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. This permit may be appealed pursuant to 30 TAC § 50.139.
12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
14. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

PERMITS 79188 and PSDTX1072

Date: _____

For the Commission

CHIEF CLERKS OFFICE

2009 NOV 24 PM 4: 28

TEXAS
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QUALITY

SPECIAL CONDITIONS

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PREVENTION OF SIGNIFICANT DETERIORATION (PSD)

1. The emissions of oxides of nitrogen (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO) volatile organic compounds (VOC), particulate matter equal to or less than 10 microns in diameter (PM/PM₁₀), sulfuric acid mist (H₂SO₄), and hydrogen fluoride (HF) from the sources covered by this permit are significant for PSD. **(PSD)**
2. Emission limits are based upon representations in the permit application dated June 12, 2006 and subsequent updates.

FEDERAL APPLICABILITY

3. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources promulgated for: **(PSD)**
 - A. Applicable General Conditions, Subpart A.
 - B. The Unit 3 boiler, identified as emission point number (EPN) LMS3 is subject to Subpart Da, Standards of Performance for Electric Utility Steam Generating Units.
 - C. The auxiliary boiler EPN AUX is subject to the applicable requirements of Subpart Db, Standards of Performance for Industrial-Institutional-Commercial Steam Generating Units.
 - D. The coal processing, storage and conveying facilities shall comply with the applicable requirements of Subpart Y, Standards of Performance for Coal Preparation Plants..
 - E. The Unit 3 boiler, EPN LMS3, applicable requirements of Subpart HHHH, Emission Guidelines and Compliance Times for Coal-Fired Electric Steam Generating Units.
 - F. The limestone crushing and handling operations for LMS3 shall comply with the applicable requirements of Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants.

SPECIAL CONDITIONS

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- G. The three diesel emergency generators and the diesel fire pump shall comply with the applicable requirements of Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.
4. These facilities shall comply with all applicable requirements of EPA regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63, promulgated for: **(PSD)**
- A. Applicable General Provisions, Subpart A.
 - B. The auxiliary boiler EPN AUX shall comply with all applicable requirements of Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial-Commercial-Institutional Boilers and Process Heaters.
 - C. The three diesel emergency generators and the diesel fire pump reciprocating internal combustion engines (RICE) shall comply with all applicable requirements of Subpart ZZZZ, National Emission Standards for Emissions of Hazardous Pollutants for Reciprocating Internal Combustion Engines.
5. If any condition of this permit is more stringent than the regulations identified in Special Conditions No. 3 and 4, then for the purposes of complying with this permit, the permit shall govern and be the standard by which compliance shall be demonstrated.

FUEL SPECIFICATIONS, OPERATING LIMITATIONS, PERFORMANCE STANDARDS, AND CONSTRUCTION SPECIFICATIONS

6. Fuel fired in the Unit 3 Boiler, EPN LMS3, shall be limited to a maximum heat input of 8,000 million British thermal units per hour (MMBtu/hr), averaged over a 30 day period, based on the higher heating value (HHV) of the fuel and the fuel fired shall be limited to: **(PSD)**
- A. Subbituminous coal, bituminous coal and petroleum coke. The maximum bituminous coal/subbituminous coal blend could be up to 40 percent/60 percent by weight respectively and the petroleum coke/subbituminous coal blend could be up to 20 percent/80 percent by weight respectively.
- Trace metal concentrations shall not to exceed, on a 12-month rolling average basis, the concentration limitations identified in Attachment A of this permit.
- B. Pipeline quality natural gas.

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- C. Use of any other fuel will require prior approval from the permitting authority.
 - D. Upon request by the Executive Director of the Texas Commission on Environmental Quality (TCEQ) or any air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel fired in the PC Boiler, or shall allow air pollution control agency representatives to obtain a sample for analysis.
7. Opacity of emissions from the steam generating units must not exceed 10 percent as determined by continuous opacity monitoring system (COMS) as required by Special Condition No. 28 averaged over a six-minute period, except for those periods as described by 30 TAC § 111.111(a)(1)(e), 30 TAC §§ 101.201 and 101.211, 40 CFR Part 60, § 60.11(c), or as otherwise allowed. **(PSD)**
8. Emissions from the Limestone Unit 3 Utility Boiler exhausting through EPN LMS3 shall not exceed the performance standards identified in the table below. The performance standards of this permit condition shall apply at all times, except during periods of planned startup and shutdown. During periods of planned startup and shutdown, the holder of this permit shall not exceed the hourly mass emission limits in the MAERT and the holder of the permit shall operate the Limestone Unit 3 Utility Boiler and associated air pollution control equipment in accordance with good air pollution control practices to minimize emissions. The permit holder shall retain records of planned startup and shutdown periods in which the emission specifications identified below are exceeded and shall identify all measures taken to mitigate emissions. Initial compliance with the performance standards of this special condition shall be demonstrated in the initial determination of compliance stack sampling utilizing EPA Reference Method testing and shall be determined based upon the average of three stack sampling test runs. Continuous compliance thereafter shall be either via Continuous Monitoring Systems (CMS) for the pollutants monitored by CMS or via stack sampling described by Special Condition No. 26. The averaging periods identified in Table A below shall be the basis for continuous compliance. **(PSD)**

A. Standards demonstrated by Continuous Monitoring Systems (CMS)

Pollutant ¹	Performance Standard (lb/MMBtu) ²	Compliance Averaging Period
NO _x	0.060	30-day rolling
	0.050	12-month rolling

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Pollutant ¹	Performance Standard (lb/MMBtu) ²	Compliance Averaging Period
SO ₂	0.10	30-day rolling
	0.06	12-month rolling
CO	0.12	30-day rolling
not lb/MMBtu:		
Hg	0.012 - 0.015 lb/GWh ⁽⁶⁾	12-month rolling ³
NH ₃	10 ppm	3-hour average

B. Standards demonstrated by Reference Method⁴ (RM) testing

Pollutant ¹	Performance Standard (lb/MMBtu) ²	Compliance Demonstration Period
PM/PM ₁₀ (front-half catch)	0.012	annual
PM/PM ₁₀ total	0.025 ⁵	annual
VOC	0.0036	annual
H ₂ SO ₄	0.0075	annual
HCl	0.0023	annual
HF	0.0007	annual

Notes:

¹ NO_x - nitrogen oxides PM₁₀ - PM10 m in diameter HF - hydrogen fluoride
 SO₂ - sulfur dioxide VOC - volatile organic compounds CO - carbon monoxide
 H₂SO₄ - sulfuric acid mist Hg - mercury PM - particulate matter
 HCl - hydrogen chloride NH₃ - ammonia

² lb/MMBtu - pounds of emissions per million Btu of heat input. Heat input is based on fuel HHV.

ppm - parts per million by volume, dry, adjusted to 5 percent oxygen (O₂).

³ Or other averaging period specified by EPA.

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- ⁴ RM - EPA Reference Methods, based on the average of three stack sampling runs to be conducted as prescribed by Special Condition No. 26.
- ⁵ Total PM/PM₁₀ including back-half (condensibles) catch of sampling train.
- ⁶ The Hg limit is based upon the blend of fuel fired. Special Condition No. 6 in HAP-14 defines how to calculate the specific limit within the range identified in the table.
9. In the event that the CEMS for NO_x or SO₂ are not operating for a period longer than one hour, the permit holder shall operate at no less than the ammonia feed rate to the selective catalytic reduction (SCR) system and the sorbent feed rate to the flue gas desulfurization system that were established during a successful initial performance test (adjusted for load) or at the feed rates that were measured prior to the loss of the CEMS, whichever feed rates are higher. **(PSD)**
10. The holder of this permit shall operate the boilers and associated air pollution control equipment in accordance with good air pollution control practices to minimize emissions during startup and shutdown, by operating in accordance with a written startup and shutdown plan. The plan shall include detailed procedures for review of relevant operating parameters of the boilers and associated air pollution control equipment during startup and shutdown to make adjustments and corrections to reduce or eliminate any excess emissions. The plan shall also address readily foreseeable startup scenarios, including hot startups, when the operation of the boiler is only temporarily interrupted, and provide for appropriate review of the operational condition of the boilers before initiating startup. **(PSD)**
11. The 155 MMBtu/hr auxiliary boiler, identified as EPN AUX, shall meet the following specifications:
 - A. Emissions of NO_x shall not exceed 0.036 lb/MMBtu, averaged over 3 hours of operation except during startup and shutdown.
 - B. Opacity of emissions shall not exceed 5 percent.
 - C. Fuel shall pipeline quality natural gas.
 - D. Operation of the auxiliary boiler shall be limited to a maximum annual heat input of 135,780 MMBtu/yr, which is the equivalent of a 10-percent annual capacity factor.

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12. Stack sampling ports and platform(s) as specified in the attachment entitled "Chapter 2, Stack Sampling Facilities," or an alternate design may be required at a later date if determined necessary by the TCEQ Regional Director or the TCEQ Austin Compliance Support Division.
13. The three emergency generators, EPNs ICE-1, ICE-2 and ICE-3, and Firewater Pump Engine, EPN ICE-4, shall each be limited to a maximum of 500 non-emergency hours per year and these engines shall be limited to firing distillate fuel oil containing no more than 500 ppm by weight sulfur. Purchased fuel shall comply with the EPA standards for nonroad diesel fuel in 40 CFR Part 80, regulation of Fuels and Fuel Additives, in effect at the time of purchase.

AMMONIA (NH₃) STORAGE

14. Anhydrous ammonia storage is subject to the following requirements.
 - A. The pressurized ammonia storage tanks shall be located within a
 - (1) physical barrier to vehicular traffic; and
 - (2) containment system which is capable of holding the entire volume of material stored.
 - B. Piping and unloading points shall be protected from impact by falling objects.
 - C. Each tank vent valve shall be equipped with an alarm which will notify personnel that the relief valve has opened.
 - D. Tanks shall be vapor balanced to the transport vessel during all tank filling operations. The vapor return line shall be purged back to either the transport vessel or the storage tank after every tank loading operation and prior to disconnection of the line. Interlocks shall be installed so that the unloading pump will not run unless the vapor return line to the transport vessel is connected.
 - E. All plant personnel assigned to anhydrous ammonia injection operations shall participate in continuing training in safety guidelines for the handling of anhydrous ammonia, to be conducted no less frequently than once every three years: new and transferred personnel shall complete all initial training required for their specific assignments prior to assumption of their new duties.

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- F. Overhead activity involving the lifting of heavy equipment above the anhydrous ammonia storage area shall not be permitted.
 - G. The holder of this permit shall maintain a complete emergency response plan at the plant site that describes the course of action to be taken by personnel in the event of an anhydrous ammonia tank or line rupture, or a severe anhydrous ammonia leak. This plan shall include water-mitigation methods, notification of the proper civil authorities, and any potentially affected residences and any other appropriate organizations. This plan shall be made available upon request to representatives of the TCEQ or any local program having jurisdiction.
15. Audio, olfactory, and visual checks for ammonia leaks shall be made once per shift within the operating area.
- A. No later than one hour following detection of a leak, plant personnel shall take the following actions:
 - (1) Locate and isolate the leak.
 - (2) Stop the leak by bypassing the leaking equipment or taking equipment out of service.
 - B. If the leaking equipment cannot be repaired or replaced within 6 hours, use clamping procedures to prevent the leak until replacement or repair can be performed.

MATERIAL HANDLING OPERATING LIMITATIONS AND STANDARDS

- 16. Coal and petroleum coke shall be delivered at the rail car unloading building which shall be partially enclosed as described in the application.
- 17. If spontaneous combustion occurs in a coal or petroleum coke stockpile, plant personnel will begin efforts as soon as possible to extinguish or eliminate the fire, except when extinguishing the fire may unduly jeopardize the safety of plant personnel and equipment, or may cause the fire to spread, in which case the stockpile fire may be permitted to burn itself out.

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18. A watering truck and/or the coal and petroleum coke yard watering system shall be used to minimize dust emissions from the active coal or petroleum coke storage pile area as necessary. Surface crusting agents or like chemicals shall be used as necessary to minimize dust emissions from the inactive coal or petroleum coke storage pile area.
19. Plant roads shall be paved with a cohesive hard surface which can be cleaned by sweeping or washing; or sprinkled with water and/or surface crusting agents as necessary to maintain compliance with all TCEQ rules and regulations.
20. Material open storage area footprints shall be limited as follows:

<u>Source</u>	<u>EPN</u>	<u>Area, acres</u>
Active Storage Pile*	FH-10	57
Limestone Storage Pile	LM-6	1

* footprint is not limited to a specific location

21. All conveyors shall be covered, enclosed, partially covered, or partially enclosed, as represented in the application, to minimize fugitive PM emissions. If visibility problems occur, additional controls may be required. Coverings and enclosures are considered abatement equipment, and should be kept in good repair.
22. Fugitive emissions from the transfer points on belt conveyors, any material handling, and the stockpile activities shall not create an off-property nuisance condition. A trained observer with delegation from the Executive Director of the TCEQ may determine compliance with this special condition by 40 CFR Part 60, Appendix A, RM 22, or equivalent. Continuous demonstration of compliance with this special condition is not required. If this condition is violated, additional controls or process changes may be required to limit visible PM emissions.
23. As determined by a certified opacity observer with delegation from the Executive Director of the TCEQ and according to 40 CFR 60, Appendix A, RM 9, or equivalent, opacity of emissions from any single fabric filter baghouse stack shall not exceed 5 percent averaged over a six-minute period. Continuous demonstration of compliance with this special condition is not required.
24. Material handling baghouses or bin vent filters, designed to meet an emission limit of 0.01 grain PM per dry standard cubic foot of exhaust, properly installed and in good working order.

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INITIAL DEMONSTRATION OF COMPLIANCE

25. The holder of this permit shall perform initial stack sampling and other testing to establish the actual quantities of air contaminants being emitted into the atmosphere. Unless otherwise specified in this special condition, the sampling and testing shall be conducted in accordance with the methods and procedures specified in Special Condition No. 26. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. The TCEQ Executive Director or his designated representative shall be afforded the opportunity to observe all such sampling. (PSD)

A. For the PC Boiler, EPN LMS3:

- (1) Demonstrate compliance with the performance standards of Special Condition No. 8 and the hourly emission rates of the MAERT, using the average of three one-hour stack sampling test runs for each contaminant.
- (2) Air contaminants to be sampled and analyzed include: NO_x, SO₂, CO, VOC, H₂SO₄, HCl, HF, PM, PM₁₀, NH₃, Pb, and Hg. Diluents to be measured include O₂ or carbon dioxide (CO₂).
- (3) Demonstrate compliance with the performance standards of Special Condition No. 7 applicable to normal operations, using the average of 30 six-minute readings as provided in 40 CFR 60.11(b).
- (4) Demonstrate compliance with 40 CFR Part 60, Subparts A and Da, for NO_x, SO₂, PM, and opacity.
- (5) Boiler load during testing shall be maintained as follows.
 - (a) Operate at maximum firing rates for the atmospheric conditions occurring during the test as measured by millions of pounds of steam generated per hour or MW of electric generator output. If the steam generating unit is unable to operate at maximum rates during testing, then additional stack testing may be required when higher production rates are achieved.
 - (b) During 30-day average emission testing, the boiler load does not have to be maximum, but the load must be representative of future operating conditions and must include at least one 24-hour period at full load. If the steam generating unit is unable to operate at maximum rates during

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testing, then additional stack testing may be required when higher production rates are achieved.

- B. For the Auxiliary Boiler, EPN AUX:
- (1) Demonstrate compliance with the NO_x performance standard of Special Condition No. 11 and the hourly NO_x and CO emission rates of the MAERT, using the average of three one-hour stack sampling test runs for each contaminant.
 - (2) Demonstrate compliance with the opacity limitation of 40 CFR 60 Subpart Db and Special Condition No. 11.
 - (3) Demonstrate compliance with the SO₂ emission rate of the MAERT through fuel sampling to demonstrate use of sweet natural gas.
 - (4) Demonstrate compliance with the PM/PM₁₀ and VOC emission rates of the MAERT through operation of the auxiliary boiler within its design limitations.
- C. For Coal Handling:
- (1) For the coal handling facilities with stack emissions, demonstrate compliance with the opacity limits of this permit and 40 CFR 60, Subpart Y.
 - (2) For the coal handling facilities with fugitive emissions, demonstrate compliance with the opacity limits of 40 CFR 60, Subpart Y using 40 CFR Part 60, Appendix A, Reference Method 9.
- D. For at least one material handling baghouse, to be selected by the Waco Regional Director of the TCEQ, or his designated representative, sample PM emissions using RM 5 testing to show compliance with the emission limit of Special Condition No. 24.
- E. For the Emergency Generator and Fire Water Pump engines, EPNs ICE-1 through ICE-4, demonstrate compliance with the emission rates of the MAERT by showing compliance with the fuel oil requirements of Special Condition No. 13.
- F. For the Cooling Tower, EPN MCT-3, demonstrate compliance with the emission rates of the MAERT by records that demonstrate that the drift eliminators are designed to limit drift as specified in the application, and by inspection of

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modules selected by the regional director or his designated representative for consistency with the specified design; flow bypassing the drift eliminators; and damage to the eliminators.

- G. Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division. Test waivers and alternate or equivalent procedure proposals for New Source Performance Standards testing which must have EPA approval shall be submitted to the TCEQ Austin Compliance Support Division.
- H. Sampling as required by this condition shall occur within 60 days after achieving the maximum fuel firing rate at which the PC Boiler will be operated but no later than 180 days after initial start-up. The first boiler operating day of 30-day average initial performance testing required by 40 CFR § 60.46a(f) must commence within this time.

TEST METHODS AND PROCEDURES

26. Sampling Methods Required and Pre-test meeting requirements: **(PSD)**

- A. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual, EPA Methods in 40 CFR Part 60, Appendix and 40 CFR Part 51, Appendix M, EPA Conditional Test Methods, and American Society for Testing and Materials (ASTM) as follows:
 - (1) Appendix A, Methods 1 through 4, as appropriate, for exhaust flow, diluent, and moisture concentration;
 - (2) Appendix A, Method 5 or 17, modified with a controlled condensate method subject to approval from TCEQ prior to sampling, for concentrations of total PM;
 - (3) Appendix A, Method 5 or 17, for the filterable concentration of PM (front-half catch);
 - (4) Appendix A, Method 6, 6a, 6c, or 8, for the concentration of SO₂;
 - (5) Appendix A, Method 7E for the concentrations of NO_x and O₂, or equivalent methods;

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- (6) Appendix A, Method 8 or a modified Method 8 for H₂SO₄; or a controlled condensate method subject to approval from TCEQ prior to sampling
 - (7) Appendix A, Method 9 for opacity;
 - (8) Appendix A, Method 10 for the concentration of CO;
 - (9) Appendix A, Method 19, for applicable calculation methods;
 - (10) Appendix A, Method 22, for visual determination of fugitive emissions from materials sources;
 - (11) Appendix A, Method 25A, modified to exclude methane and ethane, for the concentration of VOC (to measure total carbon as propane);
 - (12) Appendix A, Method 26 or 26A for HCl and HF;
 - (13) EPA Conditional Test Method 27 (CTM-027), for NH₃;
 - (14) Appendix A, Method 29 for the metals listed in Attachment A;
 - (15) Appendix M, Methods 201A and 202, or Appendix A, Reference Method 5, for the concentration of particulate matter less than 10 microns in diameter, PM₁₀, to include back-half condensibles, modified with a controlled condensate method subject to approval from TCEQ prior to sampling;
 - (16) Appendix M, Methods 201A or Appendix A, Reference Method 5, for the filterable concentration of particulate matter less than 10 microns in diameter, PM₁₀ (front-half catch);
 - (17) ASTM D6784-02, Standard Test Method for Elemental, Oxidized, Particle-Bound, and Total Mercury in Flue Gas Generated from Coal-Fired Stationary Sources (also known as the Ontario Hydro Method), or other approved EPA methods.
 - (18) Any deviations from those procedures must be approved by the Executive Director of the TCEQ prior to sampling.
- B. The TCEQ Waco Regional Office shall be given notice as soon as testing is scheduled but not less than 30 days prior to sampling to schedule a pretest meeting.

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- (1) The notice shall include:
 - (a) Date for pretest meeting.
 - (b) Date sampling will occur.
 - (c) Name of firm conducting sampling.
 - (d) Type of sampling equipment to be used.
 - (e) Method or procedure to be used in sampling.
 - (f) Projected date of commencement of the 30-day rolling average initial performance tests for SO₂ and NO_x, in accordance with 40 CFR § 60.46a(f).
 - (2) The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports. The permit holder shall present at the pretest meeting the manner in which stack sampling will be executed in order to demonstrate compliance with emission standards found in this permit and 40 CFR Part 60, Subparts Da, Db, and Y.
 - (3) Prior to the pretest meeting, a written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ, EPA or ASTM sampling procedures shall be made available to the TCEQ. The TCEQ Regional Director or the TCEQ Austin Compliance Support Division shall approve or disapprove of any deviation from specified sampling procedures.
- C. Information in the initial test report for the PC boiler, EPN LMS3, shall include the following data for each test run:
- (1) hourly coal and petroleum coke firing rate (in tons);
 - (2) average coal and petroleum coke Btu/lb as-received and dry weight;
 - (3) average steam generation rate in millions of pounds per hour;
 - (4) average generator output in MW;
 - (5) daily sulfur content and heat content of the solid fuel measured in accordance with EPA RM 19 to show compliance with 40 CFR Part 60, Subpart Da;

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- (6) control device operating rates, including SCR reagent injection and solids injection rates (fresh lime, recycle lime/ash);
 - (7) emissions in the units of the limits of this permit, lb/hr and lb/MMBtu, three-hour or 30-day average, as appropriate; and
 - (8) any additional records deemed necessary during the stack sampling pre-test meeting.
- D. Two copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached conditions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Waco Regional Office.

One copy to the TCEQ Austin Office of Permitting and Registration, Air Permits Division.

CONTINUOUS DEMONSTRATION OF COMPLIANCE

27. The holder of this permit shall install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) to measure and record the concentrations of NO_x, CO, and SO₂ from EPN LMS3. Diluents to be measured include O₂ or CO₂. The CEMS data shall be used to determine continuous compliance with the NO_x, CO, and SO₂ emission limitations in Special Condition No. 8 and the attached MAERT. The CEMS shall be operated according to the methods and procedures as set out in 40 CFR Part 60.45, 40 CFR Part 60.49Da, and 40 CFR Part 60.50Da. Reporting of monitoring data shall be in accordance with methods and procedures as set out in 40 CFR Part 60.7. Compliance with the continuous emissions monitor requirements above can be demonstrated by meeting the requirements of 40 CFR Part 75 provided that the holder of this permit demonstrates compliance with all applicable NSPS regulations. **(PSD)**
28. The owner or operator of the facility shall install, calibrate, operate, and maintain a continuous opacity monitoring system (COMS) to measure and record the opacity of emissions from EPN LMS3. The COMS data shall be used to determine continuous compliance with the opacity emission limitations in Special Condition No. 7. **(PSD)**
 - A. The COMS shall satisfy all of the Federal NSPS requirements for COMS as specified in 40 CFR Part 60, Appendix B, Performance Specification 1 (PS-1). In order to demonstrate compliance with PS-1, the COMS shall meet the

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manufacturer's design and performance specifications, and undergo performance evaluation testing as outlined in 40 CFR 60, Subpart A, § 60.13. The TCEQ Regional Director shall be notified 30 days prior to the certification.

- B. The COMS shall be zeroed and spanned daily as specified in 40 CFR § 60.13. Corrective action shall be taken when the 24-hour span drift exceeds two times the amounts specified in PS-1, or as specified by the TCEQ if not specified in PS-1.
 - C. If the EPA promulgates a quality assurance, quality control standard for the COMS, a Quality Assurance Plan (QAP) shall be prepared in accordance with the EPA standard for the COMS and adhered to, within six months after promulgation. The QAP shall be maintained to reflect changes to component technology. At the request of the TCEQ Regional Director, the holder of this permit shall submit documentation demonstrating compliance with these standards.
 - D. The data shall be reduced to six-minute opacity averages, using a minimum of 36 equally-spaced data points from each six-minute period.
 - E. The COMS shall be operational during 95 percent of the operating hours of EPN LMS3, exclusive of the time required for zero and span checks. If this operational criteria is not met for the reporting quarter, the holder of this permit shall develop and implement a monitor quality improvement plan. The monitor quality improvement plan shall be developed and submitted to the TCEQ Waco Regional Office for their approval within six months. The plan should address the downtime issues to improve availability and reliability. The plan should provide additional assurance of compliance. If the monitor is down for 24 consecutive hours or more, an EPA Reference Method 9 test shall be conducted once per day during daylight hours, and parametric support shall be used during nighttime hours.
 - F. Recertification, if required, shall be based on the requirements of 40 CFR Part 60, Appendix B, PS-1 in effect at the time of initial certification.
29. The holder of this permit shall install, calibrate, operate, and maintain a CEMS to measure and record the concentration of mercury from EPN LMS3, unless another means of compliance is prescribed by federal rules. The CEMS data (or data from other means prescribed by federal rules) shall be used to demonstrate continuous compliance with the emission limitations of Special Condition No. 8 and the MAERT. Compliance with the continuous emissions monitor requirements above can be demonstrated by meeting the

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- requirements of 40 CFR Part 75 provided that the holder of this permit demonstrates compliance with all applicable NSPS regulations. **(PSD)**
30. The holder of this permit shall install, calibrate, operate, and maintain a continuous monitoring system to measure and record the concentration of NH_3 from EPN LMS3. The NH_3 concentrations shall be corrected and reported in accordance with Special Condition No. 8 and shall be used to determine continuous compliance with the NH_3 emission limitations in Special Condition No. 8 and the MAERT. The NH_3 concentration shall be tested or calculated according to one of the methods and frequencies listed below. Notification shall be provided to the TCEQ Waco Regional Office at the pretest meeting which method is going to be used, and notified 30 days in advance if a different method is going to be used.
- A. The holder of this permit may install, calibrate, maintain, and operate a CEMS to measure and record the concentrations of NH_3 .
- B. As an approved alternative to NH_3 CEMS, the permit holder may install and operate a dual stream system of NO_x CEMS at the exit of the SCR or in the EPN LMS3 stack. One of the exhaust streams would be routed, in an unconverted state, to one NO_x CEMS and the other exhaust stream would be routed through NH_3 converter to convert NH_3 to NO_x and then to a second NO_x CEMS. The NH_3 slip concentration shall be calculated from the delta between the two NO_x CEMS readings (converted and unconverted).
- C. Any other method used for measuring NH_3 slip shall require prior approval from the TCEQ Austin Compliance Support Division.
31. If any emission monitor fails to meet specified performance, it shall be repaired or replaced as soon as reasonably possible.
32. After the initial demonstration of compliance, on-going compliance with the non-mercury metal performance standards identified in Attachment A of this permit, shall be demonstrated by testing of the as-fired coal and petroleum coke at least once per calendar quarter. The emission rates for Pb in the MAERT, will also be demonstrated by this quarterly testing. The HHV of the coal and petroleum coke sample shall also be measured.
33. After the initial demonstration of compliance, on-going stack sampling of EPN LMS3 for H_2SO_4 , HCl, HF, VOC, total PM/ PM_{10} or coal and petroleum coke concentration testing, shall be used to demonstrate ongoing compliance and shall meet the following specifications: **(PSD)**

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- A. Stack sampling shall be performed once annually during periods of normal operation, except as follows:
 - (1) If the annual test does not establish compliance with a performance standard of Special Condition No. 8, the holder of this permit may conduct additional tests during the year to be averaged with the previous test(s) to demonstrate compliance; or
 - (2) If, after two years of stack sampling, the average of the two annual stack sampling results for a pollutant is less than 70 percent of the applicable performance standard identified in Special Condition No. 8, then compliance stack sampling for such pollutant may be conducted once every three years.
 - B. Sampling required in this special condition shall demonstrate compliance with the performance standards of Special Condition No. 8 and the lb/hr emission limits of the MAERT applicable to normal operations.
 - C. Sampling required in this special condition shall be conducted in accordance with the methods, procedures, and notification protocol specified in Special Condition No. 26.
 - D. Ongoing compliance with the H₂SO₄, HF, HCl, VOC, total PM/PM₁₀, tons per year emission rates in the MAERT shall be demonstrated by calculating rolling 12-month annual emissions from emission factors (lb/MMBtu, HHV) obtained from the sampling required in this condition and the monthly total heat input (MMBtu, HHV) from coal and petroleum coke.
34. Compliance with the following emission rates in the MAERT, applicable to periods of startup and shutdown, will be demonstrated as follows: **(PSD)**
- A. Compliance with the Pb and PM/PM₁₀ (filterable and total) emission rates in the MAERT applicable during startup and shutdown will be demonstrated, when firing solid fuels, if the recorded pressure drop across the baghouse meet manufacturer guidelines for proper operation during startup and shutdown.
 - B. Compliance with the VOC emission rate in the MAERT applicable during startup and shutdown will be demonstrated if the CO emissions during startup and shutdown are in compliance with the CO emission rate in the MAERT for startup and shutdown.

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- C. Compliance with the H₂SO₄, HF, and HCl emission rates in the MAERT for startup and shutdown will be demonstrated if the SO₂ emissions during startup and shutdown are in compliance with the SO₂ emission rate in the MAERT for startup and shutdown.
35. Following the initial demonstration of compliance, ongoing compliance with the emission limits for the sources and emission limitations listed in this condition shall be through source operation in accordance with manufacturer's specifications, or in accordance with written procedures that are shown to maintain operating conditions necessary for emission compliance. The Executive Director of the TCEQ or his designated representative may also require direct measurement of emissions using the sampling methods and procedures specified in Special Condition No. 26 to establish compliance with the limitations, in which case the sampled emission rate will be used to determine compliance.
- A. The Auxiliary Boiler, EPN AUX, emission limitations of Special Condition No. 11 and the MAERT.
 - B. The Emergency Diesel Engines, EPNs ICE-1 through ICE-4, emission limitations in the MAERT.
36. Following the initial demonstration of compliance, ongoing compliance with the emission rates in the MAERT for the Cooling Tower, EPN MCT-3, will be based on maintaining the total dissolved solids of the cooling tower water below 3300 ppm on an annual average and annual inspection of modules. Repairs will be made as necessary to maintain drift eliminator structural integrity and minimize bypassing of flow around drift eliminators.
37. Following the initial demonstration of compliance, ongoing compliance with the emission rates in the MAERT for the coal and petroleum coke, ash, lime and sorbent material handling baghouses or bin vent filters will be demonstrated by annual opacity testing using RM 9. The Executive Director of the TCEQ or his designated representative may also require sampling conducted in accordance with the methods and procedures specified in Special Condition No. 26 to directly measure the lb/hr emission rate, in which case the sampled lb/hr emission rate will be used to determine compliance with the applicable emission rate in the MAERT.

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RECORDKEEPING REQUIREMENTS

38. The following records shall be kept at the plant for the life of the permit. All records required in this permit shall be made available at the request of personnel from the TCEQ, the EPA, or any air pollution control agency with jurisdiction. **(PSD)**
- A. A copy of this permit.
 - B. Permit application dated June 2006 and subsequent updates submitted to the TCEQ.
 - C. A complete copy of the testing reports and records of the initial performance testing completed pursuant to Special Condition No. 25 to demonstrate initial compliance.
39. Records shall be kept for a minimum of five (5) years after collection and shall be made immediately available upon request to representatives of the TCEQ, the EPA, or any local air pollution control program having jurisdiction. The most recent two (2) years shall be maintained on-site and shall be available for inspection. The remaining three (3) years of records may be maintained off site. Records shall be legible and maintained in an orderly manner. The following records shall be maintained: **(PSD)**
- A. Continuous monitoring data for opacity, SO₂, NO_x, CO, NH₃, Hg and diluent gases, O₂ or CO₂, from CEMS to demonstrate compliance with the emission rates listed in the maximum allowable emission rates table (MAERT) and performance standards listed in Special Condition No. 8 for pollutants that are monitored by CMS. Records should identify the times when emissions data have been excluded from the calculation of average emission rates because of startup, shutdown, maintenance, and malfunction along with the justification for excluding data. CEMS data retention at intervals less than one hour is not required. The permit holder shall retain additional records of startup, shutdown, planned maintenance or malfunction periods in which the emission specifications identified in Special Condition No. 8 are exceeded and shall identify all measures taken to mitigate emissions. All records should also identify factors used in calculations that are used to demonstrate compliance with emissions limits and performance standards.
 - B. Files of all CMS quality assurance measures, calibration checks, adjustments and maintenance performed on these systems.

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- C. Steam turbine generator hourly gross electrical output in MW, including identification of shutdown intervals, for compliance with output based performance specifications of this permit.
- D. Written coal and petroleum coke analysis for all coal and petroleum coke received from each coal or petroleum coke supplier to show compliance with the sulfur and trace metal concentration limits of this permit, and written analysis provided by natural gas and diesel fuel suppliers to show compliance with the sulfur content limitations of this permit.
- E. Average coal and petroleum coke feed rate to the PC Boiler in tons per hour and the corresponding average heat input (HHV) in MMBtu/hr, based upon an average over each calendar month.
- F. Ammonia feed rate and reagent feed rate established during a successful initial performance test to fulfill the requirements of Special Condition No. 8.
- G. Hours of operation of the emergency generator and emergency fire water pump. Amount of natural gas fired in the auxiliary boiler to show compliance with the limitations of Special Condition No. 13.
- H. Tons of coal and petroleum coke received at the site monthly to show compliance with the throughput requirements of this permit.
- I. Records of cleaning and maintenance performed on conveyors and abatement equipment, including records of replacement maintenance performed on baghouses. A log should be kept with descriptions of the activity performed and the time period over which it was performed.
- J. Records required to show compliance with federally applicable programs identified in Special Condition Nos. 3 and 4.
- K. Records of audio, olfactory, and visual checks for ammonia leaks and repairs to show compliance with Special Condition No. 15.
- L. Required stack sampling results or other air emissions testing (other than CMS data) that may be conducted on units authorized under this permit after the date of issuance of this permit.

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REPORTING

40. The holder of this permit shall submit to the TCEQ Waco Regional Office and the Air Enforcement Branch of EPA in Dallas, semi-annual reports or as described in 40 CFR § 60.7. Such reports are required for each emission unit which is required to be continuously monitored pursuant to this permit. (PSD)

AS-BUILT INFORMATION

41. The holder of this permit shall submit to the TCEQ Waco Regional Office and the TCEQ Air Permits Division change pages to the permit application reflective of the final plans and engineering specifications on the PC Boiler, auxiliary boiler, emergency engines, and other sources, including their respective control equipment, no later than 30 days before initial startup of the PC Boiler. This information shall include:
 - A. All TCEQ Tables in the permit application, updated with manufacturer and other specified data.
 - B. Revised plot plans and equipment drawings as required to reflect the constructed facility.
 - C. Identification of any maximum inputs of raw materials for the as-built facility, and any diesel fuel sulfur or engine manufacturer's emission specification that is lower than the values represented in the permit application and used for calculating or establishing emissions. Accompanying this information shall be a request for permit alteration. The TCEQ shall alter the permit special conditions and MAERT to reflect any such reduction in emissions. Increases in allowable emission rates require a permit amendment before construction begins.

SITE WIDE NETTING COMMITMENT FOR NO NET INCREASE IN EMISSIONS

42. The permit holder will have no net increase in annual site-wide emissions of NO_x, SO₂, and Hg from the Limestone Electric Generating Station upon initial start-up of LMS Unit 3. The reduction of emissions relied upon for ensuring no net increase in annual emissions of NO_x, SO₂, and Hg shall occur no later than initial start-up of the unit. Following the initial start-up of LMS Unit 3, the combined annual NO_x emissions from the LMS Unit 1, LMS Unit 2, and LMS Unit 3 shall not exceed a total of 12,056.6 tons per year, and the combined annual SO₂ emissions from the LMS Unit 1, LMS Unit 2 and LMS Unit 3 shall not exceed a total of 16,844.8 tons per year, and the combined annual

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Hg emissions from the LMS Unit 1, LMS Unit 2, and LMS Unit 3 shall not exceed a total of 1,084.5 pounds per year.

43. The permit holder will have no increase in 30-day rolling average site-wide emissions of NO_x from the Limestone Electric Generating Station upon initial start-up of the LMS Unit 3. To determine the baseline 30-day rolling average of NO_x emissions which NRG Texas may not exceed, NRG Texas shall use the lowest 30-day rolling average from any consecutive 30-day period within the June-September 2006 or June-September 2007 time period. NRG Texas shall maintain records demonstrating compliance with this special condition.

PROPERTY LINE IDENTIFICATION

44. The permit holder will install and maintain a fence at the Limestone Station property line or boundary used for the air dispersion modeling demonstration of compliance with the NAAQS and PSD Increment and for the State Effects Review for issuance of Permit Nos. 79188 and PSDTX1072. Permit holder will also maintain control over access to the Limestone Station property enclosed by the fence.

Dated

Attachment A

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Non-mercury Metal Concentrations in Subbituminous Coal, Bituminous Coal or Petroleum Coke

Constituent	Maximum Concentration (ppmw)	Annual Average Concentration (ppmw)
Antimony (Sb)	59.26	15.14
Arsenic (As)	100.60	66.45
Barium (Ba)	1445.23	955.90
Beryllium (Be)	18.03	5.60
Cadmium (Cd)	7.10	1.65
Chromium (Cr)	98.39	36.11
Cobalt (Co)	24.00	18.40
Copper (Cu)	114.17	41.25
Lead (Pb)	86.18	61.00
Manganese (Mn)	924.49	120.00
Nickel (Ni)	870.57	516.00
Silver (Ag)	0.60	0.60
Vanadium (V)	3569.00	2212.00
Selenium (Se)	16.15	6.60
Zinc (Zn)	390.00	261.50

Dated

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

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This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
NORMAL OPERATIONS INCLUDING PLANNED STARTUP AND SHUTDOWN				
LMS3	Unit 3 Pulverized Coal Boiler 8,000 MMBtu/hr Nominal 800MW Gross	NO _x	1,600	1,752
		SO ₂	2,400	2,102
		CO	4,480	4,205
		VOC	136	126
		PM ₁₀ (filter)	120	420
		PM ₁₀ (total)	280	876
		H ₂ SO ₄	60	263
		NH ₃	46.2	202
		HF	38.6	24.5
		HCl	127.7	81.7
		Hg	0.88	0.07
		Pb	0.16	0.40
AUX	Auxiliary Boiler 155MMBtu/hr	NO _x	5.58	2.44
		SO ₂	0.1	0.04
		CO	12.4	5.43
		VOC	0.84	0.37
		PM ₁₀	1.2	0.51
FH-10	Fuel Handling Storage Pile	PM	9.41	41.19
		PM ₁₀	1.79	7.83
FH-15	LMS3 Fuel Handling Railcar Unloader	PM	0.66	2.91
		PM ₁₀	0.31	1.38
FH-15A	Fuel Handling Conveyor C1A	PM	0.52	2.29
		PM ₁₀	0.25	1.08
FH-16	Fuel Handling Transfer Tower TT1	PM	0.09	0.42
		PM ₁₀	0.04	0.20
FH-16A	Fuel Handling Conveyor C1A	PM	0.26	1.15
		PM ₁₀	0.12	0.54

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
FH-17	Fuel Handling Transfer Tower TT2	PM	0.13	0.58
		PM ₁₀	0.06	0.28
FH-17A	Fuel Handling Conveyor C1A	PM	0.20	0.89
		PM ₁₀	0.10	0.42
FH-17B	Fuel Handling Conveyor C1A	PM	0.66	2.91
		PM ₁₀	0.31	1.38
FH-17C	Fuel Handling Conveyor C1A	PM	0.12	0.50
		PM ₁₀	0.05	0.24
FH-18	LMS3 Fuel Handling Crusher House	PM	0.83	3.65
		PM ₁₀	0.19	0.84
FH-18A	Fuel Handling Conveyor C1A	PM	0.16	0.70
		PM ₁₀	0.08	0.33
FH-18B	Fuel Handling Conveyor C1A	PM	0.16	0.70
		PM ₁₀	0.08	0.33
FH-19	Fuel Handling Transfer Tower TT3	PM	0.04	0.17
		PM ₁₀	0.02	0.08
FH-19A	Fuel Handling Conveyor C1A	PM	0.01	0.06
		PM ₁₀	0.01	0.03
FH-19B	Fuel Handling Conveyor C1A	PM	0.01	0.06
		PM ₁₀	0.01	0.03
FH-20	Fuel Handling Silo gallery Baghouse Stack	PM ₁₀	0.21	0.90
FH-21	Fuel Handling Tripper Floor Baghouse Stack	PM ₁₀	0.86	3.75
FH-22	Fuel Reclaim Activities	PM	1.27	5.54
		PM ₁₀	0.60	2.62

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
FH-22A	Fuel Handling Conveyor C1A	PM	0.27	1.16
		PM ₁₀	0.13	0.55
FH-22B	Fuel Handling Conveyor C1A	PM	0.13	0.55
		PM ₁₀	0.06	0.26
LM-6	Limestone Handling Storage Pile	PM	0.28	1.20
		PM ₁₀	0.05	0.23
LM-6A	Limestone Handling Conveyor L4	PM	0.69	3.04
		PM ₁₀	0.33	1.44
LM-7	LMS3 Limestone Handling Shuttle Conveyor Baghouse Stack	PM ₁₀	0.77	3.38
LM-8	LMS3 Limestone Handling Reclaim Baghouse Stack	PM ₁₀	0.26	1.13
LM-9	LMS3 Limestone Handling Transfer Tower Baghouse Stack	PM ₁₀	1.29	5.63
LM-9A	Limestone Handling Conveyor L5	PM	1.41	6.16
		PM ₁₀	0.67	2.91
LM-10	LMS3 Limestone Handling Feed Silos Baghouse Stack	PM ₁₀	0.43	1.88
LM-11	LMS3 Limestone Handling Rotary Plow Baghouse Stack	PM ₁₀	0.69	3.00
LM-12	LMS3 Limestone Handling Conveyor L-5 Baghouse Stack	PM ₁₀	0.26	1.13
LM-13	LMS3 Limestone Handling Bin Vent Filter Stacks	PM ₁₀	0.34	1.50
WH-8	Gypsum Dewatering Building	PM	0.12	0.53
		PM ₁₀	0.06	0.25

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
WH-8A	Gypsum Handling Conveyor G2	PM	0.002	0.011
		PM ₁₀	0.001	0.005
WH-9	Gypsum Handling Elevating Conveyor Drop	PM	0.06	0.27
		PM ₁₀	0.03	0.13
WH-9A	Gypsum Handling Conveyor G3	PM	0.002	0.010
		PM ₁₀	0.001	0.005
WH-10	Gypsum Storage Pile	PM	0.15	0.65
		PM ₁₀	0.03	0.14
WH-11	LMS3 Bottom Ash Storage Pile Loading and Loadout	PM	0.01	0.06
		PM ₁₀	0.01	0.03
WH-12	Waste Handling Fly Ash Silo No. 3 Baghouse Stack	PM ₁₀	0.40	1.76
WH-13	Waste Handling Fly Ash Truck Loading Operation No. 2	PM	0.02	0.03
		PM ₁₀	0.01	0.02
MCT-3	Unit 3 Main Cooling tower	PM ₁₀	6.6	28.9
ICE-1	Emergency Generator Power Block Engine	NO _x	8.89	2.22
		CO	0.39	0.10
		PM ₁₀	0.065	0.016
		VOC	0.013	0.003
		SO ₂	0.23	0.06
ICE-2	Emergency Generator FGD Area Engine	NO _x	8.89	2.22
		CO	0.39	0.10
		PM ₁₀	0.065	0.016
		VOC	0.013	0.003
		SO ₂	0.23	0.06

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
ICE-3	Emergency Generator SWDA Engine	NO _x	34.83	8.71
		CO	5.43	1.36
		PM ₁₀	0.34	0.08
		VOC	1.02	0.25
		SO ₂	0.65	0.16
ICE-4	Emergency Fire Pump Engine	NO _x	8.26	2.07
		CO	0.71	0.18
		PM ₁₀	0.15	0.04
		VOC	0.15	0.04
		SO ₂	0.13	0.03
ETANKS	Engine Fuel Tanks	VOC	0.08	0.001
NGFUG	Natural Gas System Fugitives	VOC	0.11	0.49
AMFUG	SCR System Fugitives	NH ₃	0.20	0.89

(1) Emission point identification - either specific equipment designation or emission point number from a plot plan.

(2) Specific point source names. For fugitive sources, use an area name or fugitive source name.

(3) Exempt Solvent - Those carbon compounds or mixtures of carbon compounds used as solvents which have been excluded from the definition of volatile organic compound.

- VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- NO_x - total oxides of nitrogen
- SO₂ - sulfur dioxide
- PM - particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}
- PM₁₀ - particulate matter equal to or less than 10 microns in diameter
- PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
- CO - carbon monoxide
- HCl - hydrogen chloride
- HF - hydrogen fluoride
- H₂SO₄ - sulfuric acid mist
- NH₃ - ammonia
- Hg - mercury
- Pb - lead

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.
- * Emission rates are based on and the facilities are limited by the following maximum operating schedule:
24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year
- ** Compliance with annual emission limits is based on a rolling 12-month period.

Dated

CONSOLIDATED SOAH DOCKET NO. 582-08-0861
TCEQ DOCKET NO. 2007-1820-AIR
TCEQ DOCKET NO. 2008-1210-AIR

APPLICATION OF
NRG TEXAS POWER, LLC, FOR
STATE AIR QUALITY PERMIT
79188 AND PREVENTION OF
SIGNIFICANT DETERIORATION
AIR QUALITY PERMIT PSD-TX-
1072 AND HAZARDOUS AIR
POLLUTANT MAJOR SOURCE
[FCAA 112 § (g)] PERMIT HAP-14

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BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

REVISED PERMIT CERTIFICATE OF SERVICE

I hereby certify that on this the 25th day of November, 2009, a true and correct copy of the Revised Permits 79188, PSD-TX-1072, and HAP-14 and cover letters have been filed with the Chief Clerk's Office of the Texas Commission on Environmental Quality and have been served on the following attached Service List via e-mail.

CHIEF CLERK'S OFFICE
2009 NOV 25 AM 11:13
TEXAS COMMISSION
ON ENVIRONMENTAL
QUALITY

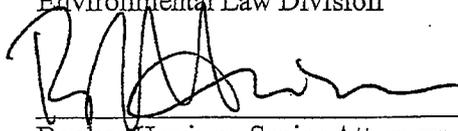
Respectfully Submitted,

Texas Commission on Environmental Quality

Mark R. Vickery, P.G., Executive Director

Stephanie Bergeron Perdue, Deputy Director
Office of Legal Services

Robert Martinez, Division Director
Environmental Law Division



Booker Harrison, Senior Attorney
SBOT No. 00793910
Christine Angeletti, Staff Attorney
SBOT No. 24059383
P. O. Box 13087, MC 173
Austin, Texas 78711-3087
(512) 239-0600

SERVICE LIST
NRG TEXAS POWER L.L.C.
SOAH DOCKET NO. 582-08-0861

FOR NRG TEXAS POWER LLC

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FOR ROBERTSON COUNTY: OUR LAND,
OUR LIVES (RCOLOL)

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CLEAN-UP

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FOR DOUGLAS W. RAY

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Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

MR BEN C CARMINE PE
DIRECTOR ENVIRONMENTAL OPERATIONS
NRG TEXAS POWER LLC
1301 MCKINNEY ST STE 2300
HOUSTON TX 77010-3035

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY
2009 NOV 24 PM 4: 28
CHIEF CLERKS OFFICE

Re: Permit Application
Permit Number: HAP14
Limestone Electric Generating Station
Jewett, Limestone County
Regulated Entity Number: RN100542927
Customer Reference Number: CN603207218
Account Number: LI-0027-L

Dear Mr. Carmine:

This is in response to your Form PI-1 (General Application for Air Preconstruction Permits and Amendments) concerning the above referenced facility.

A permit for your new facility is enclosed. The permit contains several general and special conditions that define the level of operation and a maximum allowable emissions rates table (MAERT). We appreciate your careful review of the special conditions of the permit and assuring that all requirements are consistently met. In addition, the construction and operation of the facilities must be as represented in the application.

This permit authorizes planned startup and shutdown emissions as represented in the permit application for only the sources identified on the MAERT. Maintenance activities were not represented in the application and are not authorized and will need to be authorized separately in the future.

This permit will be automatically void upon the occurrence of any of the following, as indicated in Title 30 Texas Administrative Code § 116.120(a) [30 TAC § 116.120(a)]:

1. Failure to begin construction within 18 months of the date of issuance,
2. Discontinuance of construction for more than 18 months prior to completion, or
3. Failure to complete construction within a reasonable time.

Mr. Ben C. Carmine, P.E.
Page 2

Re: Permit Number HAP14

Upon request, the Texas Commission on Environmental Quality (TCEQ) Executive Director may grant extensions as allowed in 30 TAC § 116.120(b).

The limitations of 30 TAC § 116.120(a) do not apply to physical or operational changes allowed without an amendment under 30 TAC § 116.721 of this title (relating to Amendments and Alterations). [30 TAC § 116.715(c)(1)]

This permit is effective as of the date of this letter and will be in effect for ten years from the date of approval.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC §§ 25.4 and 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.state.tx.us.

If you need further information or have any questions, please contact Mr. Erik Hendrickson, P.E., at (512) 239-1095 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,

Bryan W. Shaw, Chairman
For the Texas Commission on Environmental Quality

Enclosures

cc: Air Section Manager, Region 9 - Waco

Mr. Ben C. Carmine, P.E.
Page 3

Re: Permit Number HAP14

Project Number: 138397



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY AIR QUALITY PERMIT



*A PERMIT IS HEREBY ISSUED TO
NRG Texas Power LLC
AUTHORIZING THE CONSTRUCTION AND OPERATION OF
Limestone Electric Generating Station
LOCATED AT Jewett, Limestone County, Texas
LATITUDE 31° 25' 23" LONGITUDE 096° 15' 11"*

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code § 116.116 (30 TAC § 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC § 116.120(a), (b) and (c)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC § 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify to the Office of Permitting and Registration the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC § 116.115(b)(2)(B)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC § 116.115(b)(2)(C)]
6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC § 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC § 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC § 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with §§ 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC § 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC § 116.115(b)(2)(H)]
11. This permit may be appealed pursuant to 30 TAC § 50.139.
12. This permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC § 116.110(e)]
13. There may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC § 116.115(c)]
14. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in TCAA § 382.003(3) or violate TCAA § 382.085, as codified in the Texas Health and Safety Code. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.

PERMIT HAP14

Date: _____

For the Commission

CHIEF CLERKS OFFICE

2009 NOV 24 PM 4: 30

TEXAS
COMMISSION
ON ENVIRONMENTAL
QUALITY

SPECIAL CONDITIONS

Permit Number HAP14

MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT) APPROVAL

1. This case-by-case MACT permit (HAP-14) establishes federally enforceable MACT emission limitations for carbon monoxide (CO) (CO is a surrogate for organic hazardous air pollutants [HAPs]), filterable particulate matter (PM) (filterable PM is a surrogate for non-mercury HAP metals), hydrogen fluoride (HF), hydrogen chloride (HCl), and mercury (Hg) for the Limestone 3 Pulverized Coal Boiler (LMS3). This permit also establishes federally enforceable MACT emission limitations for CO (CO is a surrogate for organic HAPs) and filterable PM (filterable PM is a surrogate for non-mercury HAP metals) for the natural gas-fired auxiliary boiler (AUX).
2. Emission limits are based upon representations in the case-by-case MACT permit application dated May 12, 2008 and subsequent updates.
3. These facilities shall comply with all applicable requirements of Title 30 Texas Administrative Code (30 TAC) Chapter 113, 30 TAC Chapter 116, and the U.S. Environmental Protection Agency (EPA) regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63), promulgated for:
 - A. Applicable General Provisions, Subpart A.
 - B. Clean Air Act Section 112(g) case-by-case MACT determination for the PC Boiler (EPN LMS3) and a Section 112(j) case-by-case MACT determination for the Auxiliary Boiler (EPN AUX).
4. If any condition of this case-by-case MACT permit, HAP-14, conflicts with a condition of Permit 79188 and PSDTX1072 or any other authorization for the facilities covered by permit HAP-14, the most stringent permit condition shall govern.

FUEL SPECIFICATIONS, OPERATING LIMITATIONS, PERFORMANCE STANDARDS, AND CONSTRUCTION SPECIFICATIONS

5. Fuel fired in the Unit 3 Boiler, EPN LMS3, shall be limited to a maximum heat input of 8,000 million British thermal units per hour (MMBtu/hr), averaged over a 30-day period, based on the higher heating value (HHV) of the fuel and the fuel fired shall be limited to:

SPECIAL CONDITIONS

Permit Number HAP14

Page 2

- A. Sub bituminous coal, bituminous coal and petroleum coke. The maximum bituminous coal/subbituminous coal blend could be up to 40 percent/60 percent by weight respectively and the petroleum coke/subbituminous coal blend could be up to 20 percent/80 percent by weight, respectively.
 - B. Pipeline-quality natural gas.
 - C. Use of any other fuel will require prior approval from the permitting authority.
 - D. Upon request by the Executive Director of the Texas Commission on Environmental Quality (TCEQ) or any air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel fired in the PC Boiler or shall allow air pollution control agency representatives to obtain a sample for analysis.
6. Emissions from the Limestone Unit 3 Utility Boiler exhausting through EPN LMS3 shall not exceed the performance standards identified in the table below. The performance standards of this permit condition shall apply at all times, except during periods of planned start-up and shutdown. During periods of planned start-up and shutdown, the holder of this permit shall not exceed the hourly mass emission limits in the maximum allowable emission rates table (MAERT), and the holder of the permit shall operate the Limestone Unit 3 Utility Boiler and associated air pollution control equipment in accordance with good air pollution control practices to minimize emissions. The permit holder shall retain records of planned start-up and shutdown periods in which the emission specifications identified below are exceeded and shall identify all measures taken to mitigate emissions. Initial compliance with the performance standards of this special condition shall be demonstrated in the initial determination of compliance stack sampling utilizing EPA Reference Method testing and shall be determined based upon the average of three stack sampling test runs. Continuous compliance thereafter shall be either via Continuous Monitoring Systems (CMS) for the pollutants monitored by CMS or via stack sampling described by Special Condition No. 11. Compliance with the HAP emission limits for non-mercury HAP metals and organic HAPs shall be demonstrated by using the surrogate's filterable particulate matter (PM) for non-mercury HAP metals and CO for organic HAPs. The averaging periods identified in Table A below shall be the basis for continuous compliance.

A. Standards demonstrated by Continuous Monitoring Systems (CMS)

Pollutant ¹	Performance Standard	Compliance Averaging Period
CO	0.12 lb/MMBtu ²	30-day rolling
Hg	0.012 to 0.015 lb/GWh*	12-month rolling

* When firing subbituminous coal, or a blend of subbituminous coal and petroleum coke, an output-based emission limit of 0.015 lb/GWh, based on a monthly rolling 12-month average.

When firing a blend that includes both subbituminous coal and bituminous coal, a weighted, output-based emission limit, based on a monthly rolling 12-month average, computed as follows:

$$EL_b = \frac{\sum_{i=1}^n EL_i (HH_i)}{\sum_{i=1}^n HH_i}$$

Where:

- EL_b = Total allowable Hg in lb/GWh that can be emitted to the atmosphere during any 12-month period when a blend of fuels was burned.
- EL_i = Hg emissions limit for the subcategory i (coal rank), 0.015 lb/GWh for subbituminous coal and petroleum coke and 0.0075 lb/GWh for bituminous coal;
- HH_i = GWh contributed by the corresponding subcategory i (coal rank) burned during the compliance period; and
- n = Number of subcategories (coal ranks) being averaged.

During 12-month periods when a blend of fuels including bituminous coal is burned, the applicable Hg emission limit will vary with the amount of bituminous coal. For example, if a 60/40 blend of subbituminous and bituminous coals is burned, the Hg emission limit will be 0.012 lb/GWh; for an 80/20 blend, the limit will be 0.0135 lb/GWh.

SPECIAL CONDITIONS

Permit Number HAP14

Page 4

B. Standards demonstrated by Reference Method³ (RM) testing

Pollutant ¹	Performance Standard (lb/MMBtu) ²	Compliance Demonstration Period
PM (front-half catch)	0.012	annual
HCl	0.0023	annual
HF	0.0005	annual

Notes:

¹ PM - particulate matter CO - carbon monoxide
Hg - mercury HF - hydrogen fluoride HCl - hydrogen chloride

² lb/MMBtu - pounds of emissions per million Btu of heat input. Heat input is based on fuel HHV.

³ RM - EPA Reference Methods, based on the average of three stack sampling runs to be conducted as prescribed by Special Condition No. 11.

7. The holder of this permit shall operate the boilers and associated air pollution control equipment in accordance with good air pollution control practices to minimize emissions during start-up and shutdown, by operating in accordance with a written startup and shutdown plan. The plan shall include detailed procedures for review of relevant operating parameters of the boilers and associated air pollution control equipment during startup and shutdown to make adjustments and corrections to reduce or eliminate any excess emissions. The plan shall also address readily foreseeable start-up scenarios, including hot startups, when the operation of the boiler is only temporarily interrupted, and provide for appropriate review of the operational condition of the boilers before initiating start-up.
8. The 155 MMBtu/hr Auxiliary Boiler (EPN AUX) shall meet the following specifications:
 - A. Emissions of CO shall not exceed 0.04 lb/MMBtu, averaged over 3 hours of operation except during start-up and shutdown.
 - B. Emissions of filterable PM shall not exceed 0.0022 lb/MMBtu, averaged over 3 hours of operation except during start-up and shutdown.
 - C. Fuel shall be limited to pipeline quality natural gas.

SPECIAL CONDITIONS

Permit Number HAP14

Page 5

- D. Operation of the auxiliary boiler shall be limited to a maximum annual heat input of 135,780 MMBtu/yr, which is the equivalent of a 10 percent annual capacity factor.
9. Stack sampling ports and platform(s) as specified in the attachment entitled "Chapter 2, Stack Sampling Facilities," or an alternate design may be required at a later date if determined necessary by the TCEQ Regional Director or the TCEQ Austin Compliance Support Division.

INITIAL DEMONSTRATION OF COMPLIANCE

10. The holder of this permit shall perform initial stack sampling and other testing to establish the actual quantities of air contaminants being emitted into the atmosphere. Unless otherwise specified in this special condition, the sampling and testing shall be conducted in accordance with the methods and procedures specified in Special Condition No. 11. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. The TCEQ Executive Director or his designated representative shall be afforded the opportunity to observe all such sampling.
- A. For the PC Boiler, EPN LMS3:
- (1) Demonstrate compliance with the performance standards of Special Condition No. 6 and the hourly emission rates of the MAERT, using the average of three one-hour stack sampling test runs for each contaminant.
 - (2) Air contaminants to be sampled and analyzed include: CO, HCl, HF, filterable PM, and Hg. Diluents to be measured include O₂ or carbon dioxide (CO₂).
 - (3) Boiler load during testing shall be maintained as follows.
 - (a) Operate at maximum firing rates for the atmospheric conditions occurring during the test as measured by millions of pounds of steam generated per hour or MW of electric generator output. If the steam generating unit is unable to operate at maximum rates during testing, then additional stack testing may be required when higher production rates are achieved.
 - (b) During 30-day average emission testing, the boiler load does not have to be at maximum, but the load must be representative of future operating conditions and must include at least one 24-hour period at full load. If the steam generating unit is unable to operate at maximum rates during

SPECIAL CONDITIONS

Permit Number HAP14

Page 6

testing, then additional stack testing may be required when higher production rates are achieved.

- B. For the Auxiliary Boiler (EPN AUX) demonstrate compliance with the CO and filterable PM performance standards of Special Condition No. 8 using the average of three one-hour stack sampling test runs for each contaminant.
- C. Requests to waive testing for any pollutant specified in this condition shall be submitted to the TCEQ Office of Permitting, Remediation, and Registration, Air Permits Division. Test waivers and alternate or equivalent procedure proposals for New Source Performance Standards testing which must have EPA approval shall be submitted to the TCEQ Field Operations Support Division, MC-174.
- D. Sampling as required by this condition shall occur within 60 days after achieving the maximum fuel firing rate at which the PC Boiler will be operated but no later than 180 days after initial start-up. The first boiler operating day of 30-day average initial performance testing required by 40 CFR § 60.48Da(f) must commence within this time.

TEST METHODS AND PROCEDURES

11. Sampling Methods Required and Pre-test meeting requirements:

- A. Sampling shall be conducted in accordance with the appropriate procedures of the TCEQ Sampling Procedures Manual, EPA Methods in 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, EPA Conditional Test Methods, and American Society for Testing and Materials (ASTM) as follows:
 - (1) Appendix A, Methods 1 through 4, as appropriate, for exhaust flow, diluent, and moisture concentration;
 - (2) Appendix A, Method 5 or 17, for the filterable concentration of PM (front-half catch);
 - (3) Appendix A, Method 10 for the concentration of CO;
 - (4) Appendix A, Method 19, for applicable calculation methods;
 - (5) Appendix A, Method 26 or 26A for HCl and HF;

SPECIAL CONDITIONS

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- (6) Appendix M, Methods 201A or Appendix A, Reference Method 5, for the filterable concentration of particulate matter less than 10 microns in diameter, PM₁₀ (front-half catch);
 - (7) ASTM D6784-02, Standard Test Method for Elemental, Oxidized, Particle-Bound, and Total Mercury in Flue Gas Generated from Coal-Fired Stationary Sources (also known as the Ontario Hydro Method), or other approved EPA methods.
 - (8) Any deviations from those procedures must be approved by the Executive Director of the TCEQ prior to sampling.
- B. The TCEQ Waco Regional Office shall be given notice as soon as testing is scheduled but not less than 30 days prior to sampling to schedule a pretest meeting.
- (1) The notice shall include:
 - (a) Date for pretest meeting.
 - (b) Date sampling will occur.
 - (c) Name of firm conducting sampling.
 - (d) Type of sampling equipment to be used.
 - (e) Method or procedure to be used in sampling.
 - (2) The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports. The permit holder shall present at the pretest meeting the manner in which stack sampling will be executed in order to demonstrate compliance with emission standards found in this permit.
 - (3) Prior to the pretest meeting, a written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ, EPA or ASTM sampling procedures shall be made available to the TCEQ. The TCEQ Regional Director or the TCEQ Field Operations Support Division, MC-174 shall approve or disapprove of any deviation from specified sampling procedures.
- C. Information in the initial test report for the PC boiler, EPN LMS3, shall include the following data for each test run:
- (1) hourly coal and petroleum coke firing rate (in tons);

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- (2) average coal and petroleum coke Btu/lb as-received and dry weight;
 - (3) average steam generation rate in millions of pounds per hour;
 - (4) average generator output in MW;
 - (5) control device operating rates, including SCR reagent injection and solids injection rates (fresh lime, recycle lime/ash);
 - (6) emissions in the units of the limits of this permit, lb/hr and lb/MMBtu, three-hour or 30-day average, as appropriate; and
 - (7) any additional records deemed necessary during the stack sampling pre-test meeting.
- D. Three copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached conditions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Waco Regional Office.

One copy to EPA Region 6 Office, Dallas.

One copy to the TCEQ Austin Office of Permitting, and Registration, Air Permits Division.

CONTINUOUS DEMONSTRATION OF COMPLIANCE

12. The holder of this permit shall install, calibrate, maintain, and operate a continuous emission monitoring system (CEMS) to measure and record the concentrations of CO from EPN LMS3. Diluents to be measured include O₂ or CO₂. The CEMS data shall be used to determine continuous compliance with the CO, emission limitations in Special Condition No. 6 and the attached MAERT.
13. The holder of this permit shall install, calibrate, operate, and maintain a CEMS to measure and record the concentration of mercury from EPN LMS3, unless another means of compliance is prescribed by federal rules. The CEMS data (or data from other means prescribed by federal rules) shall be used to demonstrate continuous compliance with the emission limitations of Special Condition No. 6 and the MAERT.

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14. If any emission monitor fails to meet specified performance, it shall be repaired or replaced as soon as reasonably possible.
15. After the initial demonstration of compliance, on-going stack sampling of EPN LMS3 for HCl, HF, and filterable PM shall be used to demonstrate ongoing compliance and shall meet the following specifications:
 - A. Stack sampling shall be performed once annually during periods of normal operation, except as follows:
 - (1) If the annual test does not establish compliance with a performance standard of Special Condition No. 6, the holder of this permit may conduct additional tests during the year to be averaged with the previous test(s) to demonstrate compliance; or
 - (2) If, after two years of stack sampling, the average of the two annual stack sampling results for a pollutant is less than 70 percent of the applicable performance standard identified in Special Condition No. 6, then compliance stack sampling for such pollutant may be conducted once every three years.
 - B. Sampling required in this special condition shall demonstrate compliance with the performance standards of Special Condition No. 6.
 - C. Sampling required in this special condition shall be conducted in accordance with the methods, procedures, and notification protocol specified in Special Condition No. 11.
 - D. Ongoing compliance with the HF, HCl, and filterable PM tons-per-year emission rates in the MAERT shall be demonstrated by calculating rolling 12-month annual emissions from emission factors (lb/MMBtu, HHV) obtained from the sampling required in this condition and the monthly total heat input (MMBtu, HHV) from coal and petroleum coke.
 - E. To demonstrate proper operation of the baghouse, pressure drop shall be monitored and recorded.
16. Compliance with the applicable filterable PM and CO emission limits for the PC Boiler (EPN LMS3) will be demonstrated as follows for periods of start-up and shutdown:

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- A. Compliance with the filterable PM emission rates in Special Condition No. 6 will be demonstrated, when firing solid fuels, if the recorded pressure drop across the baghouse meets manufacturer guidelines for proper operation during startup and shutdown.
 - B. Compliance with the CO emission rate in the MAERT applicable during startup and shutdown will be demonstrated if the CO emissions during start-up and shutdown are in compliance with the CO emission rate in the MAERT for planned startup and shutdown.
17. Following the initial demonstration of compliance, ongoing compliance with the emission limits shall be through source operation in accordance with manufacturer's specifications, or in accordance with written procedures that are shown to maintain operating conditions necessary for emission compliance. The Executive Director of the TCEQ or his designated representative may also require direct measurement of emissions using the sampling methods and procedures specified in Special Condition No. 11 to establish compliance with the limitations, in which case the sampled emission rate will be used to determine compliance.

RECORDKEEPING REQUIREMENTS

18. The following records shall be kept at the plant for the life of the permit. All records required in this permit shall be made available at the request of personnel from the TCEQ, the EPA, or any air pollution control agency with jurisdiction.
- A. A copy of this permit.
 - B. Permit application dated May, 12, 2008 and subsequent updates submitted to the TCEQ.
 - C. A complete copy of the testing reports and records of the initial performance testing completed pursuant to Special Condition No. 10 to demonstrate initial compliance.
19. Records shall be kept for a minimum of five years after collection and shall be made immediately available upon request to representatives of the TCEQ, the EPA, or any local air pollution control program having jurisdiction. The most recent two years shall be maintained on-site and shall be available for inspection. The remaining three years of records may be maintained off site. Records shall be legible and maintained in an orderly manner. The following records shall be maintained:

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- A. Continuous monitoring data for CO, Hg and diluent gases, O₂ or CO₂, from CEMS to demonstrate compliance with the emission rates listed in the MAERT and performance standards listed in Special Condition No. 6 for pollutants that are monitored by CMS. Records should identify the times when emissions data have been excluded from the calculation of average emission rates because of planned start-up and shutdown periods along with the justification for excluding data. The CEMS data retention at intervals less than one hour is not required. The permit holder shall retain additional records of planned start-up and shutdown periods in which the emission specifications identified in Special Condition No. 6 are exceeded and shall identify all measures taken to mitigate emissions. All records should also identify factors used in calculations that are used to demonstrate compliance with emissions limits and performance standards.
- B. Files of all CMS quality assurance measures, calibration checks, adjustments and maintenance performed on these systems.
- C. Steam turbine generator hourly gross electrical output in MW, including identification of shutdown intervals, for compliance with output based performance specifications of this permit.
- D. Average coal and petroleum coke feed rate to the PC Boiler in tons per hour and the corresponding average heat input (HHV) in MMBtu/hr, based upon an average over each calendar month.
- E. Hourly average pressure drop records for the baghouse.
- F. Tons of coal and petroleum coke fired in the PC Boiler, EPN LMS3, monthly to show compliance with the fuel throughput requirements of this permit.
- G. Required stack sampling results or other air emissions testing (other than CMS data) that may be conducted on units authorized under this permit after the date of issuance of this permit.

REPORTING

- 20. The holder of this permit shall submit to the TCEQ Waco Regional Office and the Air Enforcement Branch of EPA in Dallas semi-annual reports for each emission unit which is required to be continuously monitored pursuant to this permit.

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AS-BUILT INFORMATION

21. The holder of this permit shall submit to the TCEQ Waco Regional Office and the TCEQ Air Permits Division change pages to the permit application reflective of the final plans and engineering specifications on the PC Boiler and auxiliary boiler, including their respective control equipment, no later than 30 days before initial start-up of the PC Boiler. This information shall include:
 - A. All TCEQ Tables in the permit application, updated with manufacturer and other specified data.
 - B. Revised plot plans and equipment drawings as required to reflect the constructed facility.
 - C. Identification of any maximum inputs of raw materials for the as-built facility that is lower than the values represented in the permit application and used for calculating or establishing emissions. Accompanying this information shall be a request for permit alteration. The TCEQ shall alter the permit special conditions and MAERT to reflect any such reduction in emissions. Increases in allowable emission rates require a permit amendment before construction begins.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

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This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates *	
			lb/hr	TPY**
NORMAL OPERATIONS				
LMS3	Unit 3 Pulverized Coal Boiler 8,000-MMBtu/hr Nominal 800-MW Gross	CO	960 (6)	4,205
		PM (filterable)		420 (5)
		HF		17.5 (5)
		HCl		81.7
		Hg		0.053 (5)
AUX	Auxiliary Boiler 155-MMBtu/hr	CO		2.7 (5)
		PM (filterable)		0.15 (5)
PLANNED STARTUP AND SHUTDOWN				
LMS3	Unit 3 Pulverized Coal Boiler 8,000-MMBtu/hr Nominal 800-MW Gross	CO	4,480	

- (1) Emission point identification - either specific equipment designation or emission point number from a plot plan.
- (2) Specific point source names. For fugitive sources, use an area name or fugitive source name.
- (3) CO - carbon monoxide
 PM - particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}
 PM₁₀ - particulate matter equal to or less than 10 microns in diameter
 PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 HCl - hydrogen chloride
 HF - hydrogen fluoride
 Hg - mercury
- (4) Fugitive emissions are an estimate only and should not be considered as a maximum allowable emission rate.
- (5) Emission rates reflect the case-by-case maximum achievable control technology determination for the issuance of Permit Number HAP14.
- (6) Compliance with hourly emission limit for CO is based on a rolling 30-day average.

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

* Emission rates are based on and the facilities are limited by the following maximum operating schedule:

24 Hrs/day 7 Days/week 52 Weeks/year or 8,760 Hrs/year

** Compliance with annual emission limits is based on a rolling 12-month period.