

CLARK COUNTY
DEPARTMENT OF AIR QUALITY AND
ENVIRONMENTAL MANAGEMENT
500 South Grand Central Parkway, Box 555210, Las Vegas, Nevada 89155
Part 70 Operating Permit
Source: 7
Issued in accordance with the
Clark County Air Quality Regulations (AQR)

ISSUED TO: NEVADA POWER COMPANY
CLARK GENERATING STATION

SOURCE LOCATION:

5640 Stephanie St.
Las Vegas, NV 89122
T21S, R62E, S28
Hydrographic Basin Number: 212

COMPANY ADDRESS:

P.O. Box 98910, MS # 30
Las Vegas, NV 89151-0001

NATURE OF BUSINESS:

SIC Code 4911: Electric Services
NAICS Code 221112: Fossil Fuel Electric Power Generation

RESPONSIBLE OFFICIAL:

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Title: Vice President, Power Generation
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Permit Issuance: November 3, 2009 **Expiration Date:** November 2, 2014
Permit Revision Dates: January 15, 2010
December X, 2010

**ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY AND ENVIRONMENTAL
MANAGEMENT**

Tina Gingras
Assistant Director, Clark County DAQEM

EXECUTIVE SUMMARY

NV Energy Clark Station is located at 5640 Stephanie St., Las Vegas, Nevada, 89122, in the Las Vegas Valley airshed, hydrographic basin 212, (T21S, R62E, Section 28). Hydrographic basin 212 is nonattainment for PM₁₀, and ozone (8-hour), and attainment for all other regulated air pollutants. The source is a major source for PM₁₀, NO_x, CO, and VOC and a minor source for SO_x and HAP. The PTE for NH₃ is from the 12 peaker turbines (EUs: A27 through A38).

DAQEM has Title V permitting responsibilities for the five combustion gas turbines (Turbine Units 4 through 8), 12 peaker turbines (EUs: A27 through A38), two cooling towers, and ancillary equipment at the source. The permitting history of this source reflects the changes in air quality permitting practices both at the local and federal levels in response to changing environmental regulations.

All generating and support processes at the site are grouped under SIC 4911: Electric Services (NAICS 22112: Fossil Fuel Electric Power Generation).

The following table summarizes the source PTE for each regulated air pollutant for all emission units addressed by this Part 70 OP. These emission rates are for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted in Section III of this permit.

Pollutant	PM ₁₀	NO _x	CO	SO _x	VOC	HAP	NH ₃
Tons/year	792.43	2,464.40	1,850.58	48.50	216.46	8.43	85.44

The Part 70 operating permit was issued on November 2, 2009 and a revision was issued on January 15, 2010. This minor permit revision of the Part 70 operating permit incorporates the ATC/OP Modification 4, Revision 1, issued on March 20, 2007 and the ATC Modification 6, issued on April 27, 2009.

Pursuant to AQR 12.5 (AQR 19.4), all terms and conditions in Sections I through VI and the attachments in this operating permit are federally enforceable unless explicitly denoted otherwise.

TABLE OF CONTENTS

I.	ACRONYMS.....	4
II.	GENERAL CONDITIONS	5
	A. General Requirements.....	5
	B. Modification, Revision, Renewal Requirements.....	5
	C. Reporting/Notifications/Providing Information Requirements	6
	D. Compliance Requirements	6
	E. Performance Testing Requirements	8
III.	EMISSION UNITS AND APPLICABLE REQUIREMENTS.....	9
	A. Emission Units	9
	B. Emission Limitations and Standards.....	10
	1. Emission Limits	10
	2. Production Limits.....	14
	3. Emission Controls	15
	C. Monitoring	17
	D. Testing	20
	E. Record Keeping	21
	F. Reporting	22
	G. Mitigation	23
IV.	ACID RAIN REQUIREMENTS	24
V.	OTHER REQUIREMENTS	24
VI.	PERMIT SHIELD.....	25
	ATTACHMENT 1	26
	ATTACHMENT 2	28

I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
AST	Aboveground Storage Tank
ATC	Authority to Construct
ATC/OP	Authority to Construct/Operating Permit
CAAA	Clean Air Act, as amended, or Clean Air Act Amendments
CE	Control Efficiency
CEMS	Continuous Emissions Monitoring System
CF	Control Factor
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
CPI	Urban Consumer Price Index
DAHS	Data Acquisition and Handling System
DAQEM	Clark County Department of Air Quality & Environmental Management
DEM	Digital Elevation Model
EF	Emission Factor
EO	Executive Order
EPA	United States Environmental Protection Agency
EU	Emission Unit
HAP	Hazardous Air Pollutant
HHV	Higher Heating Value
HP	Horse Power
HRSG	Heat Recovery Steam Generating Unit
LHV	Lower Heating Value
MMBtu	Millions of British Thermal Units
NEI	Net Emission Increase
NL	No Limit
NO _x	Nitrogen Oxides
NOV	Notice of Violation
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standards
NSR	New Source Review
OP	Operating Permit
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RATA	Relative Accuracy Test Audit
scf	Standard Cubic Feet
SIP	State Implementation Plan
SO _x	Sulfur Oxides
TCS	Toxic Chemical Substance
TDS	Total Dissolved Solids
TSD	Technical Support Document
ULNB	Ultra Low NO _x Burner
VOC	Volatile Organic Compound

II. GENERAL CONDITIONS

A. General Requirements

1. The Permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act (Act) and is grounds for enforcement action; for permit termination, revocation and reissuance or modification; or for denial of a permit renewal application. *[AQR 12.5.2.6(g)/AQR 19.4.1.6.a]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid. *[AQR 12.5.2.6(f)/AQR 19.4.1.5]*
3. The Permittee shall pay all permit fees pursuant to AQR Section 18. Failure to pay Part 70 permit fees may result in citations or suspensions or revocation of the Part 70 Permit. *[AQR 12.5.2.6(h)/AQR 19.4.1.7]*
4. The permit does not convey any property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)/AQR 19.4.1.6.d]*
5. The Permittee shall not hinder, obstruct, delay, resist, interfere with, or attempt to interfere with the Control Officer, or any individual to whom authority has been duly delegated for the performance of any duty by the AQR. *[AQR 5.1]*
6. The Permittee owning, operating, or in control of any equipment or property who shall cause, permit, or participate in any violation of the AQR shall be individually and collectively liable to any penalty or punishment imposed by and under the AQR. *[AQR 8.1]*
7. Any Permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. *[AQR 12.5.2.2/AQR 19.3.2]*
8. The Permittee may request confidential treatment of any records in accordance with AQR. Emission data, standards or limitations [all terms as defined in 40 CFR 2.301(a)] or other information as specified in 40 CFR 2.301 shall not be considered eligible for confidential treatment. The Administrator and the Control Officer shall each retain the authority to determine whether information is eligible for confidential treatment on a case-by-case basis. *[AQR 12.5.2.6(g)(5)/AQR 19.3.1.3 and 40 CFR 2.301]*
9. Pursuant to AQR Sections 40 and 43, no person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance. *[AQR 40 and AQR 43]*

B. Modification, Revision, Renewal Requirements

1. The Permittee shall not make a modification, as defined in AQR Section 0, to the existing source prior to receiving an ATC from the Control Officer. *[AQR 12.4]*
2. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the Permittee for the permit modification, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[AQR 12.5.2.6(g)(3)/AQR 19.4.1.6.c]*
3. Any request for a permit revision must comply with the requirements of AQR Section 12.5. *[AQR 12.5.2]*
4. The Permittee shall not build, erect, install or use any article, machine, equipment or process, the use of which conceals an emission, which would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR 60.12]*

5. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)/AQR 19.4.1.11]*
6. For purposes of permit renewal, the Permittee shall submit a timely and complete application. A timely application is one submitted between six (6) months and 18 months prior to the date of permit expiration. *[AQR 12.5.2.1/AQR 19.3.1.1.c]*
7. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with AQR in which case the permit shall not expire and all terms and conditions of the permit shall remain in effect until the renewal permit has been issued or denied. *[AQR 12.5.2.11/AQR 19.5.3.2]*

C. Reporting/Notifications/Providing Information Requirements

1. The Permittee shall comply with all notification, record keeping and reporting requirements of 40 CFR 60.7, 40 CFR 60 Subpart GG, 40 CFR 60 Subpart KKKK, 40 CFR 63 Subpart ZZZZ, 40 CFR 72.9 (f) and 40 CFR 75. *[AQR 12.5.2.6/AQR 19.4.1.3]*
2. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the Control Officer along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)/AQR 19.4.1.6]*
3. The Permittee shall allow the Control Officer or an authorized representative, upon presentation of credentials:
 - a. entry upon the Permittee's premises where the source is located, or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 - b. access to inspect and copy, at reasonable times, any records that must be kept under conditions of the permit;
 - c. access to inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - d. access to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. *[AQR 4.3. AQR 12.5.2.8(b)/AQR 19.4.3.2]*
4. Upon request of the Control Officer, the Permittee shall provide such information or analyses as will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by such source, and type or nature of control equipment in use, and the Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to such report, the Control Officer may designate an authorized agent to make an independent study and report as to the nature, extent, quantity or degree of any air contaminants which are or may be discharged from source. An authorized agent so designated is authorized to inspect any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.4]*

D. Compliance Requirements

1. The Permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the terms and conditions of this permit. *[AQR 12.5.2.6(g)(2)/AQR 19.4.1.6.b]*
2. Any person who violates any provision of this Operating Permit, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry or monitoring activities or any requirements by DAQEM is guilty of a civil offense and shall pay civil penalty levied by the Air Pollution Control Hearing Board/Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1]*
3. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review as provided in Chapter 233B of NRS. *[AQR 9.12]*
4. The Permittee of any stationary source or emission unit that fails to demonstrate compliance with the emissions standards or limitations shall submit a compliance plan to the Control Officer pursuant to AQR Section 10. *[AQR 10.1]*
5. The Permittee shall comply with the requirements of 40 CFR 61, Subpart M, of the National Emission Standard for Asbestos for all demolition and renovation projects. *[AQR 13.1.7]*
6. Requirements for compliance certification with terms and conditions contained in the Operating Permit, including emission limitations, standards, or work practices, are as follows:
 - a. the Permittee shall submit compliance certifications annually in writing to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) and the Administrator at USEPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each year will be due 30 days after the Operating Permit issuance anniversary date;
 - b. compliance shall be determined in accordance with the requirements detailed in AQR, record of periodic monitoring, or any credible evidence; and
 - c. the compliance certification shall include:
 - i. identification of each term or condition of the permit that is the basis of the certification;
 - ii. the Permittee's compliance status and whether compliance was continuous or intermittent;
 - iii. methods used in determining the compliance status of the source currently and over the reporting period consistent with AQR; and
 - iv. other specific information required by the Control Officer to determine the compliance status of the source. *[AQR 12.5.2.8(e)(3)/AQR 19.4.3.5]*
7. The Permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1]*
 - a. The annual emissions inventory shall be submitted to DAQEM no later than March 31 after the reporting year.
 - b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated.
8. The Permittee shall include a certification of truth, accuracy, and completeness by a responsible official when submitting any application form, report, or compliance certification pursuant to this Operating Permit. This certification and any other certification required shall state, "Based on the information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." This statement shall be followed by the signature and printed name of the responsible official certifying compliance and the date of signature. *[AQR 12.5.2.6(l)/AQR 19.3.4]*

9. The Permittee shall report to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below: *[AQR 25.6.1 and AQR 12.1.4.1(d)(3)(B)]*
 - a. within twenty-four (24) hours of the onset of the event, the report shall be communicated by phone (702) 455-5942, fax (702) 383-9994, or email.
 - b. within seventy-two (72) hours of the notification required by paragraph (a) above, the detailed written report containing the information required by AQR Section 25.6.3 shall be submitted.
10. The Permittee shall report to the Control Officer deviations that do not result in excess emission, with the semi-annual reports. Such reports shall include the probable cause of deviations and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B)/AQR 19.4.1.3]*

E. Performance Testing Requirements

1. Upon request of the Control Officer, the Permittee shall test or have tests performed to determine the emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of that allowed by the DAQEM regulations is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. *[AQR 4.5]*
2. Upon request of the Control Officer, the Permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. *[AQR 4.6]*
3. The Permittee shall submit for approval a performance testing protocol which contains testing, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) not less than 45 nor more than 90 days prior to the anticipated date of the performance test. *[AQR 14.10]*
4. The Permittee shall submit to EPA for approval any alternative test methods that are not already approved by EPA. *[AQR 14.1 and 40 CFR 60.8(b)]*
5. The Permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days from the end of the performance test. *[AQR 14.12 and AQR 12.5.2.8]*
6. The Control Officer may require additional or more frequent performance testing. *[AQR 4.5]*

III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. Emission Unit Mu2010glys

**B. List of the emission units and associated appurtenances summarized in Table III-A-1.
[AQR 12.5.2.3/AQR 19.2.1 and 19.3.3.3]**

Table III-A-1: List of Emission Units

EU	Description	Rating	Make	Model #	Serial #
A00704D	Simple Cycle Stationary Gas Turbine, natural gas fired, MEQ = 60, Turbine Unit 4.	60 MW	General Electric	7B (7000)	n/a
A00701A	Combined Cycle Stationary Gas Turbine with ULNB, natural gas fired, no supplemental duct-firing, MEQ = 85, Turbine Unit 5	85 MW	Westinghouse	501B6	n/a
A00702B	Combined Cycle Stationary Gas Turbine with ULNB, natural gas fired, no supplemental duct-firing, MEQ = 85, Turbine Unit 6	85 MW	Westinghouse	501B6	n/a
A00705	Combined Cycle Stationary Gas Turbine with ULNB, natural gas fired, no supplemental duct-firing, MEQ = 85 Turbine Unit 7	85 MW	Westinghouse	501B6	n/a
A00708	Combined Cycle Stationary Gas Turbine with ULNB, natural gas fired, no supplemental duct-firing, MEQ = 85, Turbine Unit 8	85 MW	Westinghouse	501B6	n/a
A00709	Lime Silo	3,700 cubic feet	n/a	n/a	n/a
A00710	Soda Ash Silo (A)	4,160 cubic feet	n/a	n/a	n/a
A00711	Soda Ash Silo (B)	4,160 cubic feet	n/a	n/a	n/a
A00712	Cooling Tower for Unit 9 Steam Turbine Generator Associated with Turbine Units 7 and 8 (EUs: A00705 & A00708)	53,000 gpm	n/a	n/a	n/a
A00713	Cooling Tower for Unit 10 Steam Turbine Generator Associated with Turbine Units 5 and 6 (EUs: A00701A & A00702B)	53,000 gpm	n/a	n/a	n/a
A21	Diesel Emergency Generator	474 hp	Detroit Diesel	8063-7416	n/a
A22	Diesel Emergency Generator	250 kW, 335.1 hp	Onan	n/a	n/a
A27	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 11	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A28	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 12	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A29	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 13	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A30	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 14	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a

EU	Description	Rating	Make	Model #	Serial #
A31	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 15	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A32	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 16	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A33	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 17	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A34	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 18	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A35	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 19	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A36	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 20	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A37	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 21	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A38	Two (2) Simple Cycle Combustion Turbines, No Supplemental Duct-firing; Turbine Unit 22	57.9 MW Combined Nominal Output	Pratt and Whitney	FT8-3 Swift Pac	n/a
A40	Ammonia Storage Tank, Sealed System	19,900 Gallons	n/a	n/a	n/a
A41	Ammonia Storage Tank, Sealed System	19,900 Gallons	n/a	n/a	n/a
A42	Ammonia Storage Tank, Sealed System	19,900 Gallons	n/a	n/a	n/a
A43	Gasoline Dispensing Operation, Aboveground Storage Tank, One Product Nozzle, Regular Unleaded Gasoline	1,200 Gallon	n/a	n/a	n/a
A45	Diesel Fire Pump	460 hp	Cummins	CFP15E-F10	n/a

n/a - not available

C. Emission Limitations and Standards

1. Emission Limits

- a. The Permittee shall not allow actual emissions from each emission unit to exceed the PTE listed in Table III-B-1, on a 12-month rolling basis. Tons-per-year emission limits of each emission unit include startup and shutdown emissions. [AQR 12.5.2.3/AQR 19.2.1 and NSR ATC/OP 00007, Modification 4 Revision 1, (03/20/07), Modification 5, (10/1/08), and Modification 6, (04/27/09)]

Table III-B-1: Emission Unit PTE, Including Startup and Shutdowns (tons per year)

EU	PM ₁₀	NO _x	CO	SO _x	VOC	NH ₃
A00704D	165.4	1,732.6	433.1	7.9	94.5	0.00
A00701A	106.9	360 ¹	319.7	7.1	21.9	0.00
A00702B	106.9		319.7	7.1	21.9	0.00

EU	PM ₁₀	NO _x	CO	SO _x	VOC	NH ₃
A00705	106.9		319.7	7.1	21.9	0.00
A00708	106.9		319.7	7.1	21.9	0.00
A00709	8.6	No Emissions				0.00
A00710	8.6					0.00
A00711	8.6					0.00
A00712	32.2					0.00
A00713	32.2					0.00
A21	0.01					0.13
A22	0.01	0.10	0.02	0.01	0.01	0.00
A27	9.10	30.96	11.55	1.01	2.86	7.12
A28	9.10	30.96	11.55	1.01	2.86	7.12
A29	9.10	30.96	11.55	1.01	2.86	7.12
A30	9.10	30.96	11.55	1.01	2.86	7.12
A31	9.10	30.96	11.55	1.01	2.86	7.12
A32	9.10	30.96	11.55	1.01	2.86	7.12
A33	9.10	30.96	11.55	1.01	2.86	7.12
A34	9.10	30.96	11.55	1.01	2.86	7.12
A35	9.10	30.96	11.55	1.01	2.86	7.12
A36	9.10	30.96	11.55	1.01	2.86	7.12
A37	9.10	30.96	11.55	1.01	2.86	7.12
A38	9.10	30.96	11.55	1.01	2.86	7.12
A40	0.00	0.00	0.00	0.00	0.00	0.00
A41	0.00	0.00	0.00	0.00	0.00	0.00
A42	0.00	0.00	0.00	0.00	0.00	0.00
A43	0.00	0.00	0.00	0.00	0.01	0.00
A45	0.01	0.05	0.01	0.02	0.01	0.00

¹ Combined limit for all four turbine units

- b. The Permittee shall not allow actual emissions from each emission unit to exceed the PTE listed in Table III-B-2. Pound-per-hour limits are normal operation (exclude startup and shutdown) limits only. NO_x, CO and NH₃ for the stationary gas turbine units, shall not be exceeded for any one-hour average period as determined by the CEMS or PEMS. [NSR ATC/OP 00007, Modification 4 Revision 1, (03/20/07) and Modification 5, (10/1/08)]

Table III-B-2: Emission Unit PTE, Excluding Startup and Shutdowns (lbs/hr)

EU	PM ₁₀	NO _x	CO	SO _x	VOC
A00701A	24.4	19.91	50.00	1.62 ¹	5.0 ¹
A00702B	24.4	19.91	50.00	1.62 ¹	5.0 ¹
A00705	24.4	19.91	50.00	1.62 ¹	5.0 ¹
A00708	24.4	19.91	50.00	1.62 ¹	5.0 ¹
A27	3.61	11.01	2.61	0.36	1.49
A28	3.61	11.01	2.61	0.36	1.49
A29	3.61	11.01	2.61	0.36	1.49
A30	3.61	11.01	2.61	0.36	1.49
A31	3.61	11.01	2.61	0.36	1.49
A32	3.61	11.01	2.61	0.36	1.49
A33	3.61	11.01	2.61	0.36	1.49
A34	3.61	11.01	2.61	0.36	1.49
A35	3.61	11.01	2.61	0.36	1.49
A36	3.61	11.01	2.61	0.36	1.49
A37	3.61	11.01	2.61	0.36	1.49
A38	3.61	11.01	2.61	0.36	1.49

¹ These short-term emission limits are not federally enforceable.

- c. The Permittee shall not allow actual emissions from each emission unit to exceed the emission rates listed in Table III-B-3. The emission limits are normal operation (exclude startup and shutdown) limits only. These limits do not apply to Turbine Units 5-8 for NO_x when Condition III-B-1-i applies. [NSR ATC/OP 00007, Modification 4 Revision 1, (03/20/07), Modification 5, (10/1/08)]

Table III-B-3: Emission Rates, Excluding Startup and Shutdowns

EU	NO _x		CO		VOC	NH ₃
	ppm ¹ @15% O ₂	lbs/ MMBtu	ppm ¹ @15% O ₂	lbs/ MMBtu	ppm @ 15% O ₂	ppm @ 15% O ₂ ⁽¹⁾
A00704D						
A00701A	5 ²	0.02		0.08		
A00702B	5 ²	0.02		0.08		
A00705	5 ²	0.02		0.08		
A00708	5 ²	0.02		0.08		
A27 – A38	5	NL	2	NL	2	5

¹ On a one-hour average.

² NO_x emission limits are based on the consent decree limit of 5 ppm with ULNB.

- d. The Permittee shall not exceed the yearly total HAP emissions for each emission unit listed in Table III-B-4. [NSR ATC/OP 00007, Modification 4 Revision 1 (03/20/07), Modification 5 (10/1/08), and Modification 6 (04/27/09)]

Table III-B-4: Emission Unit HAP PTE (tons per year)

HAP	Unit 4 (EU: A00704D) ^{1,2}	Total for Turbine Units 5-8 ^{1,2}	474 hp Generator (EU: A21)	250 kW Generator (EU: A22) ³	Total for 12 Peakers (EUs: A27 through A38) ^{1,2}	Gasoline Storage Tank (EU: A43) ⁴	460 hp Fire Pump (EU: A45)
1,3-Butadiene	1.88E-03	9.04E-03	1.71E-06	1.19E-06	5.43E-03		2.48E-06
Acetaldehyde	1.75E-01	8.40E-01	3.35E-05	2.34E-05	5.05E-01		4.87E-05
Acrolein	2.80E-02	1.34E-01	4.04E-06	2.82E-06	8.08E-02		5.88E-06
Arsenic							
Cadmium							
Beryllium							
Chromium							
Lead							
Manganese							
Formaldehyde	6.69E-02	3.22E-01	5.15E-05	3.60E-05	1.93E-01		7.50E-05
Mercury							
Nickel							
Benzene	5.68E-03	2.73E-02	4.08E-05	2.85E-05	1.64E-02	2.38E-04	5.93E-05
Ethyl Benzene	1.40E-01	6.72E-01			4.04E-01	2.17E-05	
Selenium							
Naphthalene	5.68E-03	2.73E-02			1.64E-02		5.39E-05
Toluene	9.18E-02	4.40E-01	1.79E-05	1.25E-05	2.65E-01	1.30E-04	2.60E-05
Propylene Oxide	1.27E-01	6.08E-01		7.85E-05	3.66E-01		
Xylenes	2.80E-01	1.34E+00	1.24E-05	8.70E-06	8.08E-01	4.33E-05	1.81E-05
PAHs	9.62E-03	4.64E-02	7.34E-06	5.10E-06	2.78E-02		1.07E-05
Startup/shutdown	N/A	N/A	N/A	N/A	0.29	N/A	N/A
Total	0.93	4.48	0.01	0.01	2.98	0.01	0.01

¹Formaldehyde, benzene and toluene emissions factors from Gas-Fired Boiler and Turbine Air Toxics Summary Report, prepared by Carnot Technical Services, Tustin, CA, for the Gas Research Institute and the Electric Power Research Institute, August 1996; Remaining emission factors from AP-42 Section 3.1 Stationary Gas Turbines, Table 3.1-3, Table 3.1-4, or Table 3.1-5, Supplement F.

²Based on HHV (MMBtu/hr) heat inputs of 997.9 (Unit 4); 1,199.9 (Units 5-8) and 601 (Units 11-22). ³Emission factors from AP-42 Volume 1, Section 3, Table 3.3-2, Supplement F.

⁴Not a federally enforceable limit; value is an estimate for informational purposes only.

- e. The Permittee shall not exceed the emission limits for each emission unit during allowable exceedences, as listed in Table III-B-5. *[NSR ATC/OP 00007, Modification 5 (10/1/08)]*

Table III-B-5: Emission Rates for Turbine Units 5 through 8, Allowable Exceedences¹

EU	NO _x ppm ²	lbs NO _x per MMBtu ³
A00701A	32.0	0.12
A00702B	32.0	0.12
A00705	32.0	0.12
A00708	32.0	0.12

¹Allowable exceedences are subject to the requirements of Condition III-B-1-i.

²At 15% O₂ on a one-hour average.

³NO_x EF = (32 ppm/1,000,000)*(1 lb mol/385.3 dscf)*(46.01 lb NO₂/lb mol)*(8,710 dscf/mmBtu)*(20.9/20.9-15)

- f. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. *[AQR 26.1.1]*
- g. The Permittee shall not emit NO_x from Turbine Units 5 through 8 in an amount greater than 360 tons per calendar year. The Permittee shall include the pollutants emitted during all periods of operation during the year, including during startup and shutdown. The Permittee shall not use NO_x Allowances to comply with the 360 ton NO_x limit. *[Consent Decree Condition IV-C-38-b, (08/13/07)]*
- h. The emission units shall not exceed the PTE listed in Tables III-B-1 through III-B-5. The emission limits in Tables III-B-2 and III-B-3 are normal operation limits only (exclude periods of startup and shutdown of the combustion turbines) and shall not apply to NO_x if the criteria in Condition III-B-1-i are met. Emission limits of Table III-B-1 include startup and shutdown emissions. *[AQR 12.8.19(a), NSR ATC/OP 00007, Modification 4 Revision 1, (03/20/07), and NSR ATC/OP 00007, Modification 5, Section III-B (10/01/08)]*
- i. The Permittee shall limit the Turbine Units 5 through 8 to a 5 ppm NO_x emission rate during all periods of operation except startup, shutdown, or when all of the following are met *[Consent Decree Condition IV-B-35, (08/13/07) and NSR ATC/OP 00007, Modification 5 Revision 0, Condition IV-B-2 (10/01/08)]*:
- i. Either:
 - (I) rapid combustion turbine load changes due to activation of the Automatic Safety or Equipment Protection Systems which rapidly decrease turbine load; or
 - (II) a change in the combustion mode of the ULNBs triggered by the Automatic Safety or Equipment Protection Systems;
 - ii. when the 1-hour average NO_x emissions above the 5 ppm NO_x emission rate did not occur as a result of operator neglect; improper operation or maintenance; or the tampering with, interfering with, altering, or adjusting any equipment in any way which conceals or disguises the type and quantity of emission;

- iii. when the operating conditions described in III-B-1-i-(I) or (II) are recorded in the plant's operating log within 24 hours of the event, and in the CEMS by 5 pm the next business day following the event. The notations in the log and CEMS must describe the data, list the time of entry into the log, and describe the plant operating conditions responsible for the event;
 - iv. when the 1-hour average NO_x concentration does not exceed 32 ppm, when calculated by the method described in III-C-7; and
 - v. within thirty (30) calendar days of the event, the Permittee files a report with the EPA and Department of Justice that sets forth the information that demonstrates the applicability to the event of conditions III-B-1-i-i through iv.
- j. The conditions of III-B-1-i shall apply to no more than ten (10) 1-hour averages of NO_x emissions per Turbine Unit per calendar year. The Permittee's shall demonstrate that it has met the conditions of III-B-1-i. All NO_x emissions during these 1-hour periods covered by III-B-1-i shall be included when calculating the yearly NO_x tonnage. *[Consent Decree Condition IV-B-36, (08/13/07) and NSR ATC/OP 00007, Modification 5 Revision 0, Condition IV-B-3 (10/01/08)]*

2. Production Limits

- a. The Permittee shall limit the throughput of the lime silo (EU: A00709) to 8,640 tons per rolling 12-month period. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-A-7 (03/20/07)]*
- b. The Permittee shall limit the throughput of each of the soda ash silos (EUs: A00710 and A00711) to 8,640 tons per rolling 12-month period. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-A-8 (03/20/07)]*
- c. The Permittee shall limit the maximum water flow in each cooling tower to 53,000 gallons per minute (EUs: A00712 and A00713). *[NSR ATC/OP 00007, Modification 4 Revision 1, Conditions III-A-6 and III-B-7 (03/20/07)]*
- d. The Permittee shall limit the operation of each Turbine, Unit 11 through 22 (EUs: A27 through A38), to 3,500 hours per year on natural gas during normal operation. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-A-3 (03/20/07)]*
- e. The Permittee shall limit the number of startups and shutdowns of each Turbine, Units 11 through 22 (EUs: A27 through A38), to 350 startups and 350 shutdowns per year. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-A-3 (03/20/07)]*
- f. The Permittee shall limit the operation of each emergency generator (EUs: A21 and A22) to 26 hours per rolling 12-month period for testing and maintenance purposes. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-A-4 (03/20/07)]*
- g. The Permittee shall limit the operation of the 460 hp diesel fire pump to 36 hours per year for testing and maintenance purposes (EU: A45). *[NSR ATC Modification 6 Revision 0, Condition IV-C-1 (04/27/09)]*
- h. The Permittee shall limit the monthly throughput of the GDO at this source (EUs: A43) to 10,000 gallons of gasoline. *[40 CFR 63.11111]*
- i. The Permittee shall limit operation of each natural gas turbine unit to the heat input limits listed in Table III-B-7 based on the LHV: *[NSR ATC Modification 4 Revision 1, Condition III-A (02/09/07)]*

Table III-B-7: Natural Gas Turbine Units Heat Input Limits

Emission Unit	Clark Station Designation	Natural Gas
A00704D	Turbine Unit 4	899 MMBtu/hr
A00701A	Turbine Unit 5	1,081 MMBtu/hr
A00702B	Turbine Unit 6	1,081 MMBtu/hr
A00705	Turbine Unit 7	1,081 MMBtu/hr
A00708	Turbine Unit 8	1,081 MMBtu/hr
A27	Turbine Unit 11	541 MMBtu/hr
A28	Turbine Unit 12	541 MMBtu/hr
A29	Turbine Unit 13	541 MMBtu/hr
A30	Turbine Unit 14	541 MMBtu/hr
A31	Turbine Unit 15	541 MMBtu/hr
A32	Turbine Unit 16	541 MMBtu/hr
A33	Turbine Unit 17	541 MMBtu/hr
A34	Turbine Unit 18	541 MMBtu/hr
A35	Turbine Unit 19	541 MMBtu/hr
A36	Turbine Unit 20	541 MMBtu/hr
A37	Turbine Unit 21	541 MMBtu/hr
A38	Turbine Unit 22	541 MMBtu/hr

3. Emission Controls

Turbine Units 5 through 8

- a. Turbine Units 5 through 8 are subject to all applicable requirements and limits listed in 40 CFR 60 Subpart A and Subpart GG. The Permittee shall comply with these requirements by meeting the following conditions and other applicable provisions in 40 CFR 60 Subpart A and Subpart GG:
 - i. The Permittee shall use only natural gas in the combustion turbine units at the source. *[Consent Decree Condition IV-B-33, (08/13/07)]*
 - ii. Sulfur content of natural gas fuel shall not exceed 0.5 grains per 100 dscf as determined by annual verification. *[40 CFR 75, Appendix D]*
 - iii. The Permittee shall meet the NO_x limitation under Subpart GG that is based on the formula provided in 40 CFR 60.332(a)(1).
- b. Per manufacturer's recommendations or good operating practice, the Permittee shall control PM₁₀ exhaust emissions from each simple cycle system by properly maintaining and periodically replacing inlet air filters for each turbine. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-19 (03/20/07)]*
- c. A startup period for Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705 and A00708) is defined as the one hour period immediately following the beginning of the combustion of fuel, except during a Cold Steam Turbine Startup of a unit operating in combined cycle mode. Cold Steam Turbine Startup means the startup of a power block when the steam turbine first stage base metal temperatures are below 250 degrees F. A Cold Steam Turbine Startup is defined as the two hour period immediately following the beginning of the combustion of fuel in the first unit to start in that power block. A shutdown period is defined as the period of no more than one hour that immediately precedes the cessation of fuel combustion. *[ATC Modification 5, Condition IV-E-8 (10/1/08)]*

Turbine Units 11 through 22 (Peaker Units)

- d. For Turbines 11 through 22 (EUs: A27 through A38), each startup or shutdown is limited to one (1) hour. A startup for these units shall commence with the combustion of fuel in either or both turbines of the unit, and a shutdown shall terminate with the cessation of fuel combustion in either or both turbines of the unit. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-5 (03/20/07)]*
- e. Selective Catalytic Reduction (SCR) shall be installed on Turbines 11 through 22 (EUs: A27 through A38). NO_x exhaust emissions shall be further controlled with water injection and good combustion practice. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-12 (03/20/07)]*
- f. Each SCR system shall be maintained and operated on Turbines 11 through 22 (EUs: A27 through A38) in accordance with manufacturer's specifications. SCR shall be operated at all times the associated turbine unit is operating, excluding periods of startup and shutdown. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-13 (03/20/07)]*
- g. Each SCR system shall be operated such that neither NO_x nor NH₃ emissions exceed the applicable limitations for associated turbine units listed in Tables III-B-1 and III-B-3. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-14 (03/20/07)]*
- h. The Permittee shall install, operate, and maintain an oxidation catalysts to control CO and VOC emissions on Turbines 11 through 22 (EUs: A27 through A38) in accordance with manufacturer's specifications. The catalysts shall be operated at all times the associated turbine units are operating, excluding periods of startup and shutdown. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-15 (03/20/07)]*
- i. The Permittee shall operate each oxidation catalyst on Turbine Units 11 through 22 (EUs: A27 through A38) such that CO and VOC emissions do not exceed the applicable limits listed in Tables III-B-1 and III-B-3. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-16 (03/20/07)]*

Silos

- j. The Permittee shall ensure that the baghouse on the lime silo and soda ash silos (EUs: A00709 through A00711) is in operation during the silo loading. The Permittee shall ensure that the baghouse operates at a minimum of 99.9 percent efficiency at all times. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-9 (03/20/07)]*

Cooling Towers

- k. The Permittee shall ensure that drift eliminators are installed on the cooling towers (EUs: A00712 and A00713) with a maximum drift rate of 0.002 percent, based on manufacturer's specifications. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-7 (03/20/07)]*
- l. The Permittee shall limit the total dissolved solids (TDS) concentration in the cooling tower (EU: A00712 and A00713) process water to 12,000 ppm on a 30-day rolling average. *[NSR ATC/OP 00007, Modification 4 Revision 1, Conditions III-A-6 and III-B-7 (03/20/07)]*

Diesel Engines

- m. The Permittee shall burn only low sulfur (<0.05 percent) diesel fuel in the emergency generators and fire pump (EUs: A21, A22, and A45). *[NSR ATC/OP 00007 Modification 6, Conditions IV-D-3, (04/27/09)]*
- n. The Permittee shall operate the fire pump (EU: A45) with turbocharger and aftercooler. *[NSR ATC 00007, Modification 6, Conditions IV-D-1, (04/27/09)]*
- o. Beginning June 1, 2010, the Permittee shall burn only diesel fuel with a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume in the fire pump (EU: A45). *[NSR ATC 00007, Modification 6, Conditions IV-D-4, (04/27/09)]*

Gasoline Dispensing

- p. Beginning January 10, 2011, the Permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to the following:
 - i. minimize gasoline spills;
 - ii. clean up spills as expeditiously as practicable;
 - iii. cover all open gasoline containers and all storage tank fill-pipes with a gasketed seal when not in use; and
 - iv. minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. *[40 CFR 63.11116]*

Other

- q. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected source including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. *[40 CFR 60.11(d)]*
- r. The Permittee must comply with the control requirements contained in this section. If there is inconsistency between standards or requirements, the most stringent standard or requirement shall apply.

D. Monitoring

- 1. The Permittee shall comply with applicable monitoring requirements of 40 CFR 60 Subparts A, GG and KKKK by maintaining CEMS on Turbine Units 5 through 8 (EUs: A00701A through A00708) and on Turbine Units 11 through 22 (EUs: A27 through A38). *[12.5.2.6/AQR 19.4.1.3(a)]*
 - a. Required periodic audit procedures and QA/QC procedures for CEMS shall conform to the provisions of 40 CFR 60 and 40 CFR 75.
 - b. Relative Accuracy Test Audits (RATA) of the CO, NO_x and O₂ CEMS shall be conducted at least annually.
- 2. The Permittee shall comply with applicable monitoring requirements of 40 CFR 63 Subpart CCCCCC by maintaining records of gasoline throughput. The Permittee shall comply with

applicable requirements in 40 CFR 63 Subpart CCCCCC no later than January 10, 2011. [12.5.2.6/AQR 19.4.1.3(a)]

3. The Permittee shall comply with applicable monitoring requirements of 40 CFR 63 Subpart ZZZZ by May 3, 2013. [12.5.2.6/AQR 19.4.1.3(a)]
4. Emissions of NO_x and/or CO greater than the applicable limits outlined in this operating permit, as determined by the NO_x and CO CEMS, shall be considered a violation of the emission limits of this permit and may result in enforcement action. However, compliant CEMS data does not preclude the use of other credible evidence in determining or showing compliance. [AQR 12.5.2.6/AQR 19.4.1.3(a)]

Turbine Units 5 through 8

5. To demonstrate continued direct compliance with operational limitations and the hourly, and/or yearly emissions limitations for NO_x and CO specified in Section III of this permit, the Permittee shall ensure that CEMS are calibrated, maintained, and operated on Turbine Units 5 through 8 to monitor and record the following parameters for each individual turbine unit:
 - a. hours of operation;
 - b. fuel consumption;
 - c. hours of downtime of the CEMS;
 - d. exhaust gas flow rate (by direct or indirect methods);
 - e. exhaust gas concentration of NO_x, CO and O₂;
 - f. one hour average NO_x concentration; and
 - g. hourly and 12-month rolling accumulated mass emissions of NO_x and CO. [AQR 12.5.2.6/AQR 19.4.1.3(a)]
6. The source shall maintain a Quality Assurance Plan (QAP) for CEMS. The QAP is binding and consistent with the regulations. The QAP contains auditing schedules, reporting schedules, and design specifications for the CEMS system. The CEMS shall conform to all provisions of 40 CFR 60.13 and 40 CFR 60 Subpart GG. Audit procedures shall conform to the provisions of 40 CFR 60 Appendix F. The QAP for CEMS required for Turbines 5 through 8 (EUs: A00701A, A00702B, A00705 and A00708) has already been submitted to and accepted by the Control Officer. [AQR 12.5.2.6/AQR 19.4.1.3(a)]
7. For Turbine Units 5 through 8 (EUs: A00701A through A00708), to determine the NO_x emission concentration on a one-hour average, the Permittee shall use CEMS in accordance with the applicable reference methods specified in 40 CFR 60 to calculate emission for each 15-minute interval within each clock hour, except as provided in this condition. Compliance with the 5 ppm NO_x emission rate shall be shown, by the Permittee, by averaging all 15-minute CEMS interval readings within a clock hour, except that any 15-minute CEMS interval that contains any part of a startup or shutdown shall not be included in the calculation of that 1-hour average. A minimum of two 15-minute CEMS interval readings within a clock hour, not including startup or shutdown intervals, is required to determine compliance with the 5 ppm NO_x emission rate, on a 1-hour average. [ATC Modification 5, Condition IV-E-7 (10/1/08)]

Turbine Units 11 through 22 (Peaker Units)

8. For Turbines 11 through 22 (EUs: A27 through A38), each CEMS shall monitor and record at least the following data:
 - a. exhaust gas concentration of NO_x, CO, NH₃ and diluent O₂;
 - b. exhaust gas flow rate (by direct or indirect methods);

- c. fuel flow rate;
 - d. hours of operation;
 - e. one-hour clock averages for NO_x, CO and NH₃ concentrations;
 - f. hourly mass emissions of NO_x, CO and NH₃;
 - g. if Permittee elects to monitor NH₃ with a DAQEM-approved Parametric Emission Monitoring System (PEMS), recording for NH₃ in (a), (e) and (f) above may be omitted; and
 - h. hours of downtime of the CEMS. *[AQR 12.5.2.6/AQR 19.4.1.3(a)]*
9. For Turbine Units 11 through 22 (EUs: A27 through A38), all emissions recorded by CEMS shall be reported in clock-hour increments. Any clock hour that contains any part of a startup event on either or both turbines of the unit shall be subject to the startup hourly limit. Any clock hour that contains any part of a shutdown event on either or both turbines of the unit shall be subject to the shutdown hourly limit. Any clock hour that contains any part of a startup event and any part of a shutdown event on either or both turbines of the unit shall be subject to the combined startup and shutdown hourly emissions limit. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-E-8 (03/20/07)]*
10. QAP for CEMS associated with Turbine Units 11 through 22 (EUs: A27 through A38) are binding and shall be consistent with the regulations. The CEMS shall conform to all provisions of 40 CFR 60.13, and 40 CFR 60 Subpart KKKK. Audit procedures shall conform to the provisions of 40 CFR 60 Appendix F, except in so far as 40 CFR 60 Subpart KKKK allows the use of 40 CFR 75 provisions. The QAP shall contain auditing schedules, reporting schedules and design specifications for the CEMS systems. The QAP for CEMS required for Turbine Units 11 through 22 has already been submitted to and accepted by the Control Officer. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-E-9 (03/20/07)]*

Cooling Tower

11. The Permittee shall continue to monitor the TDS in the cooling tower circulating water daily when operating. The Permittee shall use the conductivity measurements for TDS monitoring or equivalent method approved in advance by the Control Officer. *[AQR 12.5.2.6/AQR 19.4.1.3(a)]*

Diesel Engines

12. The Permittee shall monitor the monthly hours of operation of each engine (EU: A21, A22 and A45) for testing and maintenance using non-resettable hour meter *[NSR ATC 00007, Modification 6, Conditions IV-E-1, (04/27/09)]*
13. The diesel emergency generators (EU: A21 and A22) are subject to the provisions of 40 CFR 63, Subpart ZZZZ and shall comply with the following requirements no later than May 3, 2013:
- a. Change the oil and filter every 500 hours of operation or annually whichever comes first;
 - b. Inspect air cleaner every 1,000 hours of operation or annually whichever comes first; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually whichever comes first and replace if needed.

Other

14. Emissions of NH₃ shall be monitored either by use of an NH₃ CEMS or NH₃ Parametric Emission Monitoring System (PEMS) based on ammonia flow rate to the SCR and NO_x emissions monitoring data as approved by the Control Officer.

15. The Permittee shall perform at least one visual emissions observation on a plant-wide level each calendar quarter. Quarterly visual observations shall include the diesel-fired emergency generators and fire pump (EUs: A21, A22, and A45) while operating, not necessarily simultaneously, to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency generators or fire pump does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and, if practicable, the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. *[AQR 12.5.2.6/AQR 19.4.1.3(a) and 40 CFR 70.6]*

E. Testing

1. Turbine Unit 4 (EU: A00704D) has no enforceable short-term limitations. Turbine 4 shall be performance tested for NO_x and CO as a demonstration of compliance with its yearly emission limitations within 180 days after operating more than 500 hours in any calendar year. Table III-D-1 summarizes NO_x and CO performance test methods and frequency for Turbine Unit 4. *[AQR 12.5.2.6/AQR 19.4.1.3(a)]*

Table III-D-1: Performance Testing Requirements for Turbine Unit 4

Test Point	Pollutant	Method (40 CFR 60, Appendix A)	Frequency
Turbine/HRSG Exhaust Stack	NO _x	Chemiluminescence Analyzer (EPA Method 7E)	Within 180 days after operating more than 500 hours in any calendar year
Turbine/HRSG Exhaust Stack	CO	EPA Method 10 analyzer	
Stack Gas Parameters		EPA Methods 1, 2, 3, 4	

2. Performance testing for Turbines 5 through 8 (EUs: A00701A, A00702B, A00705 and A00708) and for Turbines 11 through 22 (EUs: A27 through A38) are subject to 40 CFR 60 Subpart A; 40 CFR 60 Subpart GG (for Turbines 5 through 8); 40 CFR 60 Subpart KKKK (for Turbines 11 through 22); 40 CFR 72; and DAQEM's Guideline on Performance Testing. *[AQR 12.5.2.6/AQR 19.4.1.3(a)]*
3. Initial performance tests for Turbine Units 5 through 8 were conducted. To demonstrate continued compliance with the emissions limitations specified in this operating permit, the Permittee shall continue to conduct performance tests on Turbine Units 5 through 8 for NO_x, CO, VOCs, and PM₁₀ once every five years, with the next series of tests due for each turbine unit within five years of the last performance test. *[AQR 12.5.2.6(d)/AQR 19.4.1.3]*
4. Performance testing for particulate matter must be conducted annually on Unit 7 and the results reported in accordance with the methods set forth in 40 CFR 60.8 and 40 CFR 60 Appendix A. The EPA shall be notified at least 30 days in advance of such tests to allow an observer to be present. Equivalent test methods may be used if approved by the EPA. *[PSD permit NV 78-01, Condition VIII-D-2 (10/01/79)]*
5. To demonstrate continued compliance with the emissions limitations specified in this operating permit, performance tests shall be conducted on Turbines 11 through 22 for NO_x, CO, VOC, PM₁₀ and opacity once every two (2) years. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-D-10 (03/20/07)]*
6. Pursuant to 40 CFR 60 Subpart KKKK, if two (2) or more turbines are connected to a single generator, each turbine must meet the emission limits for NO_x specified in the subpart. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-D-11 (03/20/07)]*

7. Table III-D-2 summarizes VOC, PM₁₀, NO_x, and CO performance test methods for Turbine Units 5 through 8 and 11 through 22. [AQR 12.5.2.6/AQR 19.4.3.1]

Table III-D-2: Turbine Performance Testing Requirements

Test Point	Pollutant	Method	Frequency	
			Turbine Units 5 through 8	Turbine Units 11 through 22
Turbine/HRSG Exhaust Stack	NO _x	Chemiluminescence Analyzer (EPA Method 7E)	Every 5 years	Every 2 years
Turbine/HRSG Exhaust Stack	CO	EPA Method 10 analyzer	Every 5 years	Every 2 years
Turbine/HRSG Exhaust Stack	VOC	EPA Method 25a	Every 5 years	Every 2 years
Turbine/HRSG Exhaust Stack	PM ₁₀	EPA Method 201/202 or 201A/202 or 5/202	Every 5 years -- Annually for Turbine Unit 7	Every 2 years
Turbine/HRSG Exhaust Stack	Opacity	EPA Method 9	Every 5 years	Every 2 years
Stack Gas Parameters		EPA Methods 1, 2, 3, 4	Every 5 years	Every 2 years

8. The baghouses shall be performance tested after each 8,760 hours of use. Table III-D-3 summarizes PM₁₀ performance test method for all baghouses. [AQR 12.5.2.6/AQR 19.4.3.1]

Table III-D-3: Performance Testing Requirements for Baghouses

Test Point	Pollutant	Method (40 CFR 60, Appendix A)	Frequency
Baghouse Exhaust Stack	PM ₁₀	EPA Method 5	Every 8,760 hours of use

9. Upon written request and justification the Administrator may waive the requirement for a specific annual source test. The waiver request is to be submitted prior to the required test and must include documentation justifying such action. Documentation may include, but is not necessarily limited to, a showing that Unit 7 has not, or has only minimally operated over the past year. The Permittee shall then be notified by EPA regarding the need to test. [PSD permit NSR 4-7-1 NV 78-02 Condition VIII-D-3 (08/08/83)]

F. Record Keeping

1. The Permittee shall comply with all applicable record keeping requirements of 40 CFR 60.7, 40 CFR 60 Subpart GG, 40 CFR 60 Subpart KKKK, 40 CFR 72, 40 CFR 75 Subpart F, and 40 CFR 63 Subpart ZZZZ and CCCCCC.
2. The Permittee shall maintain records on-site that require semi-annual reporting and include, at a minimum: [AQR 12.5.2.6/AQR 19.4.1.3(b)]
 - a. the magnitude and duration of excess emissions, notifications, monitoring system performance, malfunctions and corrective actions, taken as required by 40 CFR 60.7;
 - b. CEMS audit results or accuracy checks, and corrective actions, as required by 40 CFR 60 and the CEMS Quality Assurance Plan;
 - c. all CEMS information required by 40 CFR 75, including a CEMS monitoring plan, as well as time, duration, nature and probable cause of any CEMS downtime and corrective actions taken;
 - d. monthly CEMS NO_x, CO, and NH₃ slip data;

- e. dates and hours of operation of each emission unit except EU A43;
 - f. dates, times, and duration of each turbine startup and shutdown event;
 - g. startup and shutdown emissions per turbine in pounds per hour and yearly emissions, including startup, shutdown and normal operations, in tons per year (12-month rolling total);
 - h. monthly and 12-month rolling total quantity of natural gas consumed in each gas turbine; monthly and 12-month rolling total throughput of the lime silo and each soda ash silo;
 - i. monthly and 12-month rolling total gasoline throughput pursuant to 40 CFR 63.11116(b); and
 - j. monthly and 12-month rolling total hours of operation of, and quantity of diesel fuel consumed in, each of the diesel generators and fire pump for testing and maintenance purposes and a separate log for operation during emergencies.
3. The Permittee shall maintain records on-site that include, at a minimum: *[AQR 12.5.2.6/AQR 19.4.1.3(b)]*
- a. sulfur content of natural gas;
 - b. sulfur content of diesel fuel as certified by the supplier;
 - c. daily TDS content of tower circulation water when operating;
 - d. log of visible emission checks;
 - e. annual copies of all reports, compliance certifications, other submissions and all records made or required under the Acid Rain Program;
 - f. copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program to demonstrate compliance with the requirements of the Acid Rain Program; and
 - g. results of performance testing.
4. For all inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). *[AQR 12.5.2.6/AQR 19.4.1.3(b)]*
5. Records and data required by this operating permit to be maintained by Permittee may, at the Permittee's expense, be audited at any time by a third party selected by the Control Officer. *[AQR 4.4 and AQR 12.5.2.8(b)/19.4.3.2]*
6. All records and logs, or a copy thereof, shall be kept on-site for a minimum of five (5) years from the date the measurement was taken or data was entered and shall be made available to DAQEM upon request. *[AQR 12.5.2.6/AQR 19.4.1.3(b)]*
7. Should this stationary source, as defined in 40 CFR 68.3, become subject to the accidental release prevention regulations in Part 68, then the Permittee shall submit an RMP by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR 70 or 71. *[AQR 12.5.2.6(d)(4)(B)/AQR 19.4.1.3]*
8. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. *[AQR 12.5.2.6/AQR 19.4.1.3(b)]*

G. Reporting

1. All report submissions shall be addressed to the attention of the Control Officer. [AQR 14.3, 21.4, and 22.4]
2. All reports shall contain a certification of truth, accuracy, and completeness by the responsible official. [AQR 12.5.2.6/AQR 19.4.1.3(c) and AQR 12.5.2.6(l)/19.3.4]The Permittee shall submit semi-annual reports to the Control Officer. [AQR 12.5.2.6/19.4.1.3(c)]
3. The following requirements apply to semi-annual reports: [AQR 12.5.2.6/AQR 19.4.1.3(c)]
 - a. The report shall include a semi-annual summary of each item listed in Section III-E-2.
 - b. The report shall include semi-annual summaries of any permit deviations, their probable cause, and corrective or preventative actions taken.
 - c. The report shall be submitted to DAQEM within 30 calendar days after the due date.
4. Regardless of the date of issuance of this permit, the schedule for the submittal of reports to the Control Officer shall be as outlined in Table III-F-1 [AQR 12.5.2.6(d)/AQR 19.4.1.3(c)]:

Table III-F-1: Reporting Schedule

Required Report	Applicable Period	Due Date ¹
Semi-annual Report for 1st half of the year.	January, February, March, April, May, June	July 30 each year
Semi-annual Report for 2nd half of the year. Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	12 Months	30 days after the Operating Permit issuance anniversary date
Annual Emission Inventory Report	Calendar Year	March 31 each year
Excess Emission Notification	As Required	Within 24 hours of the onset of the event
Excess Emission Report	As Required	Within 72 hours of the notification
Deviation Report	As Required	Along with semi-annual reports
Performance Testing	As Required	Within 60 days from the end of the test

¹If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal are due on the next regularly scheduled business day.

5. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements, and requirements of applicable federal regulations. [AQR 4.4 and AQR 12.5.2.6/AQR 19.4.1.3(c)]
6. The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72 and 40 CFR 75. [40 CFR 72.9(f)]

H. Mitigation

1. The source has no federal offset requirements associated with this permitting action. [AQR 59.1.1]

IV. ACID RAIN REQUIREMENTS

1. In accordance with the provisions of Title IV of the Clean Air Act and 40 C.F.R. Parts 72 through 77, this Acid Rain Permit is issued to Nevada Power Company dba NV Energy Clark Station, Las Vegas, NV.
2. All terms and conditions of the permit are enforceable by DAQEM and EPA under the Clean Air Act. *[40 CFR 72]*
3. The Permittee shall comply with all the applicable requirements of the Acid Rain Permit Application located in Attachment 2. *[40 CFR 72.30]*
4. This Acid Rain permit incorporates the definitions of terms in 40 CFR Part 72.2. *[40 CFR 72.2]*
5. This permit is valid for a term of five (5) years from the date of issuance unless a timely and complete renewal application is submitted to DAQEM. *[40 CFR 72.69]*
6. A timely renewal application is an application that is received at least six months prior to the permit expiration date. *[40 CFR 72.30]*
7. Emissions from this source shall not exceed any allowances that the source lawfully holds under Title IV of the Act or its regulations. *[AQR 12.5.2.6/AQR 19.4.1.4 and 40 CFR 70.6(a)(4)]*

V. OTHER REQUIREMENTS

1. The Permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a CFC or HCFC compound as a working fluid, unless such fluid has been approved for sale in such use by the Administrator. The Permittee shall keep record of all paperwork relevant to the applicable requirements of 40 CFR 82 on site. *[40 CFR 82]*

VI. PERMIT SHIELD

1. Compliance with the terms contained in this permit shall be deemed compliance with the following applicable requirements in effect on the date of permit issuance: [AQR 12.5.2.9/AQR 19.4.6]

Table V-1: Applicable Requirements Related to Permit Shield

Citation	Title
AQR Section 14.1.56 Subpart GG	Standards of Performance for New Stationary Sources (NSPS) – Stationary Gas Turbines

Table V-2: Streamlined requirements Related to Permit Shield

Regulation (40 CFR)	Pollutant	Regulatory Standard		Permit Limit		Value Comparison			Averaging Comparison			Shield Statement
		Value	Units	Value	Units	Standard Value, in Units of the Permit Limit ¹	Permit Limit Value	Is the Permit Limit Equal or More Stringent?	Standard Averaging Period	Permit Limit Averaging Period	Is the Permit Limit Equal or More Stringent?	
60.332 (GG)	NOx	75 ¹	ppmvd @ 15% O ₂	5.0	ppmvd @ 15% O ₂	75 ¹	5.0	Yes	4 hour	1 hour	Yes	The permit limit is more stringent than the standard, based on both concentration and averaging time, therefore the facility should be shielded from the standard.

¹The 60.332 NOx standard is a formula; the value used here (75 ppmvd) is the minimum possible value of the standard for any emission unit.

**ATTACHMENT 1
APPLICABLE REGULATIONS**

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. NRS, Chapter 445B.
2. Applicable AQR Sections:

Citation	Title
AQR Section 0	Definitions
AQR Section 4	Control Officer
AQR Section 5	Interference with Control Officer
AQR Section 8	Persons Liable for Penalties – Punishment: Defense
AQR Section 9	Civil Penalties
AQR Section 10	Compliance Schedule
AQR Section 11	Ambient Air Quality Standards
AQR Section 12 (Through June 30, 2010)	Preconstruction Review for New or Modified Stationary Sources
AQR Section 12.5 (Through June 30, 2010)	Air Quality Models
AQR Section 12.4 (07/01/2010)	Authority to Construct Application and Permit Requirements for Part 70 Sources
AQR Section 12.5 (07/01/2010)	Part 70 Operating Permit Requirements
AQR Section 14.1.13	Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978
AQR Section 14.1.15	Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units
AQR Section 14.1.56	Standards of Performance for New Stationary Sources (NSPS) – Standards of Performance for Gas Turbines
AQR Section 18	Permit and Technical Service Fees
AQR Section 19 (Through June 30, 2010)	40 CFR Part 70 Operating Permits
AQR Section 21	Acid Rain Continuous Emissions Monitoring
AQR Section 22	Acid Rain Permits
AQR Section 24	Sampling and Testing - Records and Reports
AQR Section 25	Upset/Breakdown, Malfunctions
AQR Section 26	Emissions of Visible Air Contaminants
AQR Section 28	Fuel Burning Equipment
AQR Section 29	Sulfur Contents of Fuel Oil
AQR Section 40	Prohibition of Nuisance Conditions
AQR Section 41	Fugitive Dust
AQR Section 42	Open Burning
AQR Section 43	Odors in the Ambient Air
AQR Section 55	Preconstruction review for New or Modified Stationary Sources in the 8-Hour Ozone Nonattainment Area
AQR Section 60	Evaporation and Leakage
AQR Section 70	Emergency Procedures
AQR Section 80	Circumvention

3. CAAA, Authority: 42 U.S.C. § 7401, et seq.
4. Applicable 40 CFR Subsections:

Citation	Title
40 CFR 52.21	Prevention of Significant Deterioration (PSD)
40 CFR 52.1470	SIP Rules
40 CFR 60, Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions
40 CFR 60, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978
40 CFR 60, Subpart Dc	Standards of Performance for Small Industrial – Commercial – Institutional Steam Generating Units
40 CFR 60, Subpart GG	Standards of Performance for New Stationary Sources (NSPS) – Stationary Gas Turbines
40 CFR 60, Subpart KKKK	Standards of Performance for New Stationary Sources (NSPS) – Stationary Combustion Turbines
40 CFR 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR 70	Federally Mandated Operating Permits
40 CFR 72	Acid Rain Permits Regulation
40 CFR 73	Acid Rain Sulfur Dioxide Allowance System
40 CFR 75	Acid Rain Continuous Emission Monitoring
40 CFR 82	Protection of Stratospheric Ozone

**ATTACHMENT 2
 ACID RAIN PERMIT APPLICATION**

United States
 Environmental Protection Agency
 Acid Rain Program

OMB No. 2060-0258



Acid Rain Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31

This submission is: New Revised

STEP 1

Identify the source by plant name, State, and ORIS code.

Plant Name	Clark Station	State	NV	ORIS Code	2322
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STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a." For new units, enter the requested information in columns "c" and "d."

a	b	c	d
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)	New Units Commence Operation Date	New Units Monitor Certification Deadline
1	Yes		
2	Yes		
3	Yes		
11A	Yes	2/01/2008	7/30/2008
11B	Yes	2/01/2008	7/30/2008
12A	Yes	2/01/2008	7/30/2008
12B	Yes	2/01/2008	7/30/2008
13A	Yes	2/01/2008	7/30/2008
13B	Yes	2/01/2008	7/30/2008
14A	Yes	2/01/2008	7/30/2008
14B	Yes	2/01/2008	7/30/2008
15A	Yes	2/15/2008	3/13/2008
15B	Yes	2/15/2008	3/13/2008
16A	Yes	2/15/2008	3/13/2008
16B	Yes	2/15/2008	3/13/2008
17A	Yes	2/02/2008	3/02/2008

Plant Name (from Step 1) Clark Station

STEP 3,
Cont'd.

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

Excess Emissions Requirements

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

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

Plant Name (from Step 1)	Clark Station
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Permit Requirements

STEP 3
Read the
standard
requirements

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

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Plant Name (from Step 1)	Clark Station
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Step 3,
Cont'd.

Liability, Cont'd.

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

(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

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

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

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

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

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

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

STEP 4

Certification

Read the certification statement, sign, and date

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

Name	William M. Clark	
Signature		Date
		2/23/07