



- c. The Permittee shall not emit into the atmosphere from any turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis, or shall not burn any fuel which contains sulfur in excess of 0.8 percent by weight, pursuant to 40 CFR 60.333 (a) and (b).

- d. At all times, the Permittee shall maintain and operate the turbines in a manner consistent with good air pollution control practice for minimizing emissions, pursuant to the NSPS, 40 CFR 60.11(d).
- 2. The emission of smoke or other particulate matter from each turbine shall not have an opacity greater than 30 percent, pursuant to 35 IAC 212.123(a), except as allowed below (35 IAC 201.149, 212.123(b) or 212.124).
  - a. The Permittee is authorized to operate the turbines in excess of 30 percent opacity during startup pursuant to 35 IAC 201.262, provided that all reasonable efforts are made to minimize startup emissions. This authorization only extends for a period of up to 24 minutes following the initial firing of fuel during each startup event of the end of startup, whichever occurs first.
- 3. The turbines are affected units under the Acid Rain Deposition Control Program pursuant to Title IV of the Clean Air Act and are subject to certain administrative and emissions monitoring requirements pursuant to 40 CFR Parts 72, 73 and 75. As affected units under the Acid Rain Program, the Permittee must also obtain an Acid Rain Permit for operation of the turbines in accordance with 40 CFR 72.30(b)(2)(ii) and 72.32(a).
- 4a. i. The only fuel fired in the turbines shall be natural gas.
  - ii. The total natural gas consumption of the turbines shall not exceed 8,475 million standard cubic feet per year. Compliance with this limit shall be determined from a running total of 12 months of data.
- b. The turbines shall be equipped, operated, and maintained with Dry low NO<sub>x</sub> combustors.
- c. i. Hourly emissions from each turbine shall not exceed the following limits, except during startup and shutdown (see Condition 5). These emission limits are based on the data provided in the application for maximum emissions. These limits reflect achievement of emission rates of 15 ppmd and 25 ppm at 15% O<sub>2</sub> for NO<sub>x</sub> and CO, respectively (0.062 lb NO<sub>x</sub>/million Btu HHV):

<u>NO<sub>x</sub></u> <u>(Lb/Hr)</u>	<u>CO</u> <u>(Lb/Hr)</u>	<u>PM/PM<sub>10</sub></u> <u>(Lb/Hr)</u>	<u>VOM</u> <u>(Lb/Hr)</u>	<u>SO<sub>2</sub></u> <u>(Lb/Hr)</u>
60.0	59.0	10.0	10.0	2.6

These limits are based on information provided in the permit application.

- ii. Notwithstanding the above, when the operating load of a turbine is 101 percent or more of the manufacturer's nominal rated output (rated output) or 50 percent or less than the rated output, NO<sub>x</sub> emissions from the turbines shall not exceed 107 lbs/hour.
- d. i. The total annual emissions of the six turbines shall not exceed the following limitations. Compliance with these annual limitations shall be determined from a running total of 12 months of emission data.

<u>Pollutant</u>	<u>Emissions (Tons/Year)</u>
NO <sub>x</sub>	245.0
CO	245.0
PM/PM <sub>10</sub>	49.0
VOM	49.0
SO <sub>2</sub>	10.0

- ii. For purposes of determining compliance with the above limitations:
  - A. Unless emission monitoring is performed for a pollutant, emissions during periods other than startup shall be determined from emission factors developed from testing in accordance with Condition 11 (NO<sub>x</sub>, CO, VOM and PM/PM<sub>10</sub>) or standard factors (SO<sub>2</sub>).
  - B. Unless an alternative factor is established for the pollutant or emission monitoring is performed for the pollutant, emissions of NO<sub>x</sub>, CO and VOM during an hour that includes a startup shall be presumed to be at the applicable hourly limit in Condition 4(c)(i) multiplied by a startup factor (S): S<sub>NO<sub>x</sub></sub> = 1, S<sub>CO</sub> = 2 and S<sub>VOM</sub> = 2. For example, the CO emissions during an hour that includes a startup shall be assumed to be 118 pounds per hour (2 x 59 = 118). These presumptions are based on data in the application describing maximum emissions during startup of a turbine. Any alternative factor for emissions during startup of a turbine shall be based on representative emission testing conducted with USEPA Reference Test Methods. (Refer to Condition 11.)
  - C. The establishment of the above procedures for determining compliance with the annual emission limits shall not shield the Permittee from responsibility for all emissions from the source, including emissions during startup or upset conditions, as other credible information may demonstrate that the above procedures do not adequately account for the actual emissions of the source.

- e. Annual emissions of hazardous air pollutants shall be less than 10 tons of any hazardous pollutant and less than 25 tons in aggregate for any combination of hazardous air pollutants, as indirectly addressed by limits on emissions of criteria pollutants.

The above limitations are established to address applicability for 40 CFR 52.21, the federal rules for Prevention of Significant Deterioration of Air Quality (PSD). These limits ensure that the construction and operation of the power plant does not constitute a new major source pursuant to PSD. These limits also ensure that this project is not subject to review under Section 112(g) of the Clean Air Act.

- 5. Each turbine shall be operated in a manner consistent with good air pollution control practice to minimize emissions associated with during startup and shutdown including the following. The Permittee shall formally review these practices at least annually and enhance them consistent with good air pollution control practice based on actual operating experience and performance of the turbines.
  - a. The Permittee shall manage the operation of the turbines to minimize multiple startups of a turbine in a single day, unless startup is tripped off, and to provide adequate time for normal startup of the turbines, except for "quick starts" that are due to requests for immediate delivery of power, as would result from unexpected loss of a transmission line or other generating capacity.
  - b. The Permittee shall operate in accordance with the manufacturer's written instructions or other written instructions developed and maintained by the Permittee, which shall include at a minimum the following measures:
    - Review of operating parameters of the unit during startup, or shutdown as necessary to make adjustments to reduce emissions;
    - Implementation of inspection and repair procedures for a turbine prior to attempting startup following repeated trips.
  - c. Maintenance of the turbines in accordance with written procedures developed and maintained by the Permittee.
  - d. These practices shall be reviewed by the Permittee at least annually and enhanced if required consistent with good air pollution control practice based on actual operating experience and performance of the turbines.

- 6a. Under this permit, the turbines may be operated for a period of up to 180 days from initial startup to allow for equipment shakedown and emissions testing as required. This period may be extended by the Illinois EPA at its discretion upon request of the Permittee, for example if additional time is needed to complete shakedown or perform emission testing due to unanticipated delays in these activities.
  - b. Upon successful completion of emission testing demonstrating compliance with applicable short-term emission limits, the Permittee may continue to operate the turbines as allowed by Section 39.5 (5) of the Environmental Protection Act.
  - c. This condition supersedes Standard Condition 6 for construction permits.
7. The Permittee shall furnish the Illinois EPA with written notification as follows:
- a.
    - i. The date construction of the turbines commenced, as defined in 40 CRR 60.2, postmarked no later than 30 days after such date, pursuant to 40 CFR 60.7(a)(1). (This notification may be provided when construction activity is commenced for the proposed source.)
    - ii. If the Permittee initially commences construction for less than six turbines, this shall be stated in the initial notification and separate notification shall be provided if construction of additional turbines is commenced pursuant to this permit. (See also Condition 17.)
  - b. The actual date of initial startup of the turbines, i.e., initial firing of fuel by turbine, postmarked within 15 days after such date, pursuant to 40 CFR 60.7(a)(3); and
  - c. The actual date that each turbine begins gainful operation, with electricity produced by the turbine available for sale at more than the minimum or avoided cost of the purchaser, postmarked within 15 days after such data.
8. Each turbine shall be equipped, operated, and maintained with a continuous monitoring system to monitor and record the fuel consumption, pursuant to 40 CFR 60.334(a).
- 9a. The Permittee shall determine sulfur content of the natural gas fired in the turbines in accordance with the applicable provisions in 40 CFR 75, Appendix D, Section 2.3.2 for pipeline natural gas combustion.
- b. The Permittee shall also sample and analyze for sulfur and nitrogen content of the natural gas being fired in the turbines in accordance with 40 CFR 60.334(b) unless alternative provisions are approved by

USEPA, in which case the Permittee shall comply with such alternative provisions.

- 10a. This permit is issued based on the turbines being gas-fired peaking units, as specified in 40 CFR Part 75, so that continuous emission monitoring is not required for NO<sub>x</sub>. To maintain this status, the three year rolling average annual capacity factor of a turbine shall not be greater than 10 percent, and the highest annual capacity factor shall not be greater than 20 percent in any one of the three averaging years. (Annual capacity factors of 10 and 20 percent are equivalent to operating at full load for 876 and 1,752 hours per year, respectively.).
  - b. Should the operation of a turbine exceed the above requirements relating to the definition of a gas-fired peaking unit in 40 CFR 75, the Permittee shall install the appropriate Continuous Monitoring System(s) on the turbine by December 31 of the following calendar year, as defined in 40 CFR 75, in order to remain in compliance with the provisions of the Acid Rain Program.
  - c. The turbines, as installed, shall be equipped with facilities, i.e., sampling ports, appropriate platforms and access and associated utilities, to allow continuous emissions monitoring systems to be readily installed and operated in accordance with 40 CFR Part 75.
- 11a. The nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic material (VOM), particulate matter (PM), and oxygen (O<sub>2</sub>) concentrations in the exhaust of the turbines and the opacity of exhaust shall be measured at the Permittee's expense by an independent testing service approved by the Illinois EPA as follows to determine compliance with the emission limits in Condition 2, 4, 5, and 6:
  - i. Within 60 days after operating a turbine at the greatest load at which it will normally be operated but not later than 180 days after its initial startup;
  - ii. Within 120 days after a written request from the Illinois EPA, for such pollutants listed above as specified by the request; and
  - iii. Any extension to these time periods that may be provided at its discretion by the Illinois EPA shall not alter the Permittee's obligation to perform emission testing for purposes of the NSPS in a timely manner as specified by 40 CFR 60.8.
- b. The following methods and procedures shall be used for testing of emissions:
  - i. The following USEPA Reference Test Methods shall be used:

Location of Sample Points

USEPA Method 1

Gas Flow and Velocity	USEPA Method 2
Stack Gas Analysis	USEPA Method 3 or 3A
Stack Gas Moisture Content	USEPA Method 4
Opacity	USEPA Method 9
Carbon Monoxide	USEPA Method 10
Volatile Organic Material	USEPA Method 18 or 25A
Nitrogen Oxides	USEPA Method 20
Particulate Matter	USEPA Method 5
Particulate Matter <sub>10</sub>	USEPA Method 201 or 201A (40 CFR 51, Appendix M)

- ii. Measurements for NO<sub>x</sub> shall be conducted in accordance with 40 CFR 60.335, as specified below, unless alternative testing procedures are approved by USEPA pursuant to 40 CFR 60.8(b):
  - A. The NO<sub>x</sub> emissions shall be computed for each run using the equation in 40 CFR 60.335(c)(1).
  - B. The span values for Method 20 shall be 300 ppm of NO<sub>x</sub> and 21 percent O<sub>2</sub>, pursuant to 40 CFR 60.335(c)(3).
  - C. The NO<sub>x</sub> emissions shall be determined at four points in the normal operating range of the turbines, including the minimum point in the range and peak load, pursuant to 40 CFR 60.331(i) and 60.335(c)(2).
  - D. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer, pursuant to 40 CFR 60.335(c)(2).
- iii. Measurements for other pollutants shall be conducted as follows:
  - A. CO, PM and VOM concentrations shall be measured at minimum intermediate and peak of gas turbine load.
  - B. PM emissions measured by USEPA Method 5, including back half condensable particulate, may be provided as an alternative to measurement of PM<sub>10</sub> emissions using USEPA Method 201 or 201A.
  - C. Measurements for organic hazardous air pollutants in the VOM (e.g., formaldehyde, toluene, acetaldehyde, and acrolein) shall be provided if VOM emissions are measured by Method 18. (See also Condition 11(c)(iii).)
  - D. Unless continuous emissions monitoring is conducted for the particular pollutant or such measurements are performed on similar turbines at another facility, measurements shall also be performed for emissions of NO<sub>x</sub>, CO and VOM during

startup of a turbine, in accordance with a plan approved by the Illinois EPA. For purposes of these measurements, as approved by the Illinois EPA, the Permittee may adapt USEPA Reference Test Methods as necessary to address the short duration and transient conditions of startups.

- c. At least 60 days prior to the actual date of testing, a written test plan shall be submitted to the Illinois EPA for review. This plan shall describe the specific procedures for testing and shall include as a minimum:
  - i. The person(s) who will be performing sampling and analysis and their experience with similar tests.
  - ii. The specific conditions under which testing shall be performed including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the turbine will be tracked and recorded.
  - iii. The specific determinations of emissions that are intended to be made, including sampling and monitoring locations; the test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods; and identification of organic hazardous air pollutants that will be measured. As part of this plan, the Permittee may set forth a strategy for performing emission testing of selected turbines provided that all turbines are fitted for testing; the identity of the turbines to be tested is determined immediately before testing; by the Illinois EPA or otherwise randomly; and continuous emission monitoring of NO<sub>x</sub> is present on all turbines. The Permittee may also propose a plan for testing across the normal operating range of the turbines; and
  - iv. The proposed plans for testing emissions during startup of a turbine as required by Condition 11(b)(iii)(D), including the turbine(s) and number of startups for which measurements will be performed; the procedures that will be followed for startup of the turbine; the approach that will be generally followed to assure that measurements can be conducted for and will be representative of the startup period; any proposed adaptations to reference test methods; and any other significant considerations for testing of emissions during startup.
- d. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification of the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the test. The Illinois EPA may, at its discretion,

accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe the testing.

- e. The Final Report for these tests shall be submitted to the Illinois EPA within 60 days after the date of the tests. The Final Report shall include as a minimum:
  - i. A summary of results.
  - ii. General information.
  - iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment and test schedule.
  - iv. Detailed description of test conditions, including:
    - A. Fuel consumption (standard ft<sup>3</sup>);
    - B. Firing rate (million Btu/hr); and
    - C. Turbine/Generator output rate (MW).
  - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
- 12a. The Permittee shall maintain records of the following items:
  - i. Manufacturer's specifications for rated turbine load;
  - ii. Heat content of the natural gas (Btu/ft<sup>3</sup>) being fired during the quarter, with supporting documentation on at least a quarterly basis;
  - iii. The sulfur content of the fuel used to fire the turbines as determined in accordance with Condition 9(a). (If the standard emissions factor is used, records shall be kept for any measurements or data on actual sulfur content.);
  - iv. Fuel consumption for each turbine as monitored in accordance with Condition 8;
  - v. A copy of the Final Report(s) for emission testing conducted pursuant to Condition 11; and
  - vi. Copies of opacity determinations taken for the source by qualified observer(s) using USEPA Method 9.

- b. The Permittee shall maintain the following operating records for the turbines:
  - i. Fuel consumption (for each turbine) as monitored in accordance with Condition 8;
  - ii. Operating logs for each turbine, which at a minimum shall include daily information for operating hours, each period when a turbine operates in peak mode, fuel consumption and period of time when inlet air-cooling is used;
  - iii. Operating hours for each turbine on a daily basis;
  - iv. Ambient temperature, and turbine load (MWe), on a daily basis for each hour turbine is operated; and
  - v. Any period of time when a turbine operates at 101 percent or more of rated output.
  
- c. The Permittee shall maintain the following records related to each startup and shutdown of the turbines:
  - i. The following information for each startup of the turbines:
    - A. Date and time of startup;
    - B. Whether operating personnel for the turbines or air environmental staff are on site during startup; and
    - C. A description of the startup, if written operating procedures are not followed during the startup or significant problems occur during the startup, including detailed explanation.
  - ii. The following information for each shutdown of a turbine:
    - A. Date and time of shutdown; and
    - B. A description of the shutdown, if written operating procedures are not followed during the shutdown or significant problems occur during the shutdown, including detailed explanation.
  - iii. The following information for the turbines when above normal opacity has been observed by source personnel:
    - A. Name of observer, position and reason for being at site;

- B. Date and duration of above normal opacity, including affected turbine, start time and time normal operation was achieved;
  - C. If normal operation was not achieved within 24 minutes, an explanation why startup could not be achieved within this time;
  - D. A detailed description of the startup, including reason for operation;
  - E. An explanation why established startup procedures could not be performed, if not performed;
  - F. The nature of opacity following the end of startup or 24 minutes of operation, whichever occurs first, and duration of operation until achievement of normal opacity or shutdown; and
  - G. Whether exceedance of Condition 5(a) [30 percent opacity] may have occurred during startup, with explanation if qualified observer was on site.
- d. The Permittee shall keep inspection, maintenance and repair logs with dates and nature of such activities for each turbine.
- e. The Permittee shall maintain the following records related to emissions:
- i. Other data not addressed above, used or relied upon by the Permittee to determine emissions;
  - ii. Fuel consumption that also identifies consumption when turbine operated in peak mode, operating hours identifying peak mode hours and number of startups for each turbine;
  - iii. The emissions of NO<sub>x</sub>, SO<sub>2</sub>, PM, VOM and CO from the turbines for each day since the previous record with supporting calculation, which shall be compiled on at least a monthly basis;
  - iv. If a NO<sub>x</sub> CEMS is present, NO<sub>x</sub> emissions, as applicable, from each turbine recorded hourly (in lb/mmBtu and lb or ton) by combining the pollutant concentration (in ppm) and diluent concentration (in percent O<sub>2</sub> or CO<sub>2</sub>) measurements according to the procedures in 40 CFR 75 Appendix F; and
  - v. Total daily, monthly and annual emissions of NO<sub>x</sub>, CO, VOM, PM and SO<sub>2</sub> from the turbines, which shall be compiled on at least a monthly basis.

- f. The Permittee shall maintain records that identify:
  - i. Any periods during which a continuous monitoring system was not operational, with explanation.
  - ii. Any day in which emission exceeded an applicable standard or limit.
- g. The Permittee shall maintain records documenting its annual review of its operating procedures (See Condition 5).
- 13. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be available for inspection and copying by the Illinois EPA upon request. Any record retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 14a. The Permittee shall comply with applicable reporting requirements under the Acid Rain Program, with a single copy of such report sent to Illinois EPA upon request. This copy shall be sent to the Division of Air Pollution Control, Compliance Unit.
- b. In conjunction with the Annual Emission Report required by 35 IAC Part 254, the Permittee shall provide:
  - i. The operating hours for each turbine, the total number of startups, and the total fuel consumption during the preceding calendar year;
- c. If the emission testing required by Condition 11 is not performed within 45 days of beginning gainful operation of a turbine, the Permittee shall submit a report summarizing NO<sub>x</sub>, CO and VOM (or hydrocarbon) emissions of the turbines as determined by diagnostic measurements, e.g., combustion gas analyzers, during shakedown of the turbines.
- d. The Permittee shall notify the Illinois EPA within 10 days if NO<sub>x</sub> or CO emissions exceed 150 tons/ year.
- e. The Permittee shall notify the Illinois EPA within 10 days if a turbine is operated at 101 percent or more of rated output, with duration of operation and explanation.
- f. If there is any exceedance of the requirements of Conditions 1, 2 or 4 of this permit, as determined by the records required by this permit or by other means, the Permittee shall submit a report within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to

reduce emissions and future occurrences.

15. Two copies of required reports and notifications concerning equipment operation or repairs, performance testing, or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Telephone: 217/782-5811      Facsimile: 217/782-6348

and one copy shall be sent to the Illinois EPA's regional office at the following address, unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
2009 Mall Street  
Collinsville, Illinois 62234

Telephone: 618/346-5120      Facsimile: 618/346-5155

16. For purposes of the new source review rules (40 CFR 52.21 and 40 CFR 63 Subpart B), based on information provided by the Permittee, this construction permit is issued based on the plant addressed herein being a separate source from the nearby power plant that is proposed to be construction by Clay County Power, LLC.
17. If the Permittee does not initially commence construction of all six turbines, the Permittee may subsequently commence construction of the remaining provided that: 1) The facility is initially developed to support six turbines, and 2) Construction activity at the site is at no time interrupted for a period of time greater than 18 months. This Condition supersedes Standard Condition 1.
18. This Permit for the above referenced project does not relieve the Permittee of the responsibility to comply with all Local, State and Federal Regulations which are part of the applicable Illinois State Implementation Plan, as well as all other applicable Federal, State, and Local requirements.

Please note that additional rules addressing NO<sub>x</sub> emissions from these turbines may be adopted in the near future in response to USEPA's so called "NO<sub>x</sub> SIP call" and the development of Illinois's plans for attainment of the ozone air quality standard in the Chicago and Metro-East ozone nonattainment areas.

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If you have any questions concerning this permit, please contact Youra Benofamil at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:YB:jar

cc: Region 3

I.D. No.: 025803AAD  
Application No.: 00050050  
MEP Flora Power, LLC

Attachment A

Emission Units

<u>Description</u>	<u>Manufacturer</u>	<u>Number</u>	<u>Rated Heat Input<sup>1</sup> (mmBtu/hr)</u>	<u>Rated Electrical Output<sup>1</sup> (MW<sub>e</sub>)</u>	<u>Control</u>
Turbines	GE	6	885	84.75	Low NO <sub>x</sub> Combustors

<sup>1</sup> Ratings are the nominal output based on lower heating value of natural gas and operation at 59°F.

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