

Table Continue...

Emission Unit	Description	Rated Capacity
Turbine GT 34-1	Peaking Turbine	34.0 MW 479 mmBtu/hr
Turbine GT 34-2	Peaking Turbine	34.0 MW 479 mmBtu/hr
Total MW		272.0 MW

- c. i. This permit is issued based on the affected turbines not being subject to restrictions on NO_x emissions pursuant to 35 IAC 217.388(a)(1) or (a)(2), which take effect on May 1, 2010, or to associated testing and monitoring requirements of 35 IAC 217.394(a) through (e), as a consequence of the implementation of the Program and the operation of the affected turbines as low usage units.
- ii. This permit and the Program do not excuse the Permittee from implementation of certain applicable inspection, maintenance and recordkeeping requirements of 35 IAC Part 217, Subpart Q, that are related to reducing NO_x emissions from the affected turbines. (See Condition 3.)
- iii. This permit and the Program do not prohibit affected turbines on which NO_x emission control technology is operated from being included in emissions averaging plans pursuant to 35 IAC 217.390.

Note: To include affected turbine(s) in an emissions averaging plan, the Permittee would have to comply with all applicable requirements of 35 IAC 217.390 and other applicable requirements of 35 IAC 217, Subpart Q, for the selected affected turbine(s).

- d. This permit does not relax or revise any requirements and conditions that apply to the operation of the source, including applicable monitoring, testing, recordkeeping, and reporting requirements in the current permits for the source.
- 2a. i. Except as provided in Condition 2(b) or Condition 8, the operation of the affected turbines, shall not exceed 20,000 MW-hours per year, so that each affected turbine qualify as "low usage unit" pursuant to 35 IAC 217.388(a)(3)(B).
- ii. These limits shall take effect on May 1, 2010, with the first determination of compliance addressing the one year period from May 1, 2010 to April 30, 2011. Thereafter, this limit shall apply on a calendar year basis, starting with calendar year 2011.
- b. As provided by 35 IAC 217.392(c), if the operation of the affected turbines exceeds 20,000 MW-hours per year, the Permittee may use NO_x allowances to show compliance notwithstanding such exceedance, provided that the criteria of 35 IAC 217.392(c)(1)(A) and (B) are met (i.e., the

exceedance was due to an anomalous or unforeseen operating scenario inconsistent with historical operation and the Permittee has not used NO_x allowances for more than two such exceedances in the last five calendar years, inclusive). In such case, the Permittee shall surrender NO_x allowances to the Illinois EPA in accordance with 35 IAC 217.392(c)(2). The Permittee shall also submit a report to the Illinois EPA by no later than March 1 of the following year addressing the exceedance(s) and the surrender of NO_x allowances in accordance with 35 IAC 217.392(c)(3). This report shall also demonstrate that the circumstances surrounding the exceedance were such that the Permittee was qualified to surrender NO_x allowances for the exceedance. Until this report is submitted, the exceedance shall be considered a deviation for purposes of Condition 6(b).

- 3a. The Permittee shall inspect and perform periodic maintenance on the affected turbines as follows, pursuant to 35 IAC 217.388(a)(4):
 - i. Either the manufacturer's recommended inspection and maintenance of the applicable air pollution control equipment, monitoring device, and the affected turbines; or
 - ii. If the original equipment manual is not available or substantial modifications have been made that require an alternative procedure for the applicable air pollution control device, monitoring device, or the affected turbines, the Permittee must establish a plan for inspection and maintenance in accordance with what is customary for the type of air pollution control equipment, monitoring device, and the affected turbines.
- b. At all times, the Permittee shall maintain and operate the affected turbines in a manner consistent with good air pollution control practice for minimizing emissions.
- 4a. Pursuant to 35 IAC 217.394(f), the testing and monitoring requirements of 35 IAC 217.394(a) through (e) do not apply to the affected turbines if they are operating in compliance with the requirements of 35 IAC 217.388(a)(3) and 217.392(c) (i.e., operation as low usage units), unless an affected turbine is included in an emissions averaging plan.
 - b. Notwithstanding the above, as also provided by 35 IAC 217.394(f), when, in the opinion of the Illinois EPA or USEPA, it is necessary to conduct testing for affected turbine(s) for NO_x emissions to demonstrate compliance with 35 IAC 217.388, the Permittee must, at its own expense, conduct testing in accordance with the applicable methods and procedures specified in 35 IAC 217.394 within 90 days after receipt of a notice to test from the Illinois EPA or USEPA.
- 5a. For each affected turbine, the Permittee shall maintain the records required by 35 IAC 217.396(d), including records of the operation of each unit for each calendar year, in MW-hours for the affected turbines, as specified by 35 IAC 217.396(d)(2).

- b. The Permittee shall maintain records for each affected turbine to support the above records, including:

- i. A log or other records for the operation of the unit, i.e., periods when the unit is operated and the level of operation or output (MW) of the unit or associated generator, or fuel usage (gallons/hour) if other than at the capacity of the unit.

Note: For the purpose of this log, the Permittee may assume that the unit is always operated at capacity, in which case records for the level of operation are not required.

- ii. Records for the cumulative operation of the unit, in MW-hours as appropriate, which shall be compiled on a periodic basis.
- iii. If the level of operation, output or fuel usage is not normally tracked on at least an hourly basis, and the Permittee wants to consider the actual level of operation of the unit, the Permittee shall keep records for the fuel usage of the unit, which shall be compiled on a periodic basis to calculate operation in MW-hours and compared with the determination of operation based on other records.

- 6a. The Permittee shall report the following information to the Illinois EPA on annual basis. The information for the first year, addressing the period from May 1, 2010 to April 30, 2011, shall be reported by October 31, 2011. Thereafter, this information shall be reported with the Annual Emission Report for the source, which is due by May 1 of the following year.

- i. The combined annual operation of the affected turbines, in MW-hours for the previous year.
- ii. If the operation of the affected turbines is planned for purposes other than routine exercise, readiness testing or maintenance purpose, the projected annual operation of the affected turbine, in MW-hours for the current year, with supporting explanation.

- b. The Permittee shall promptly notify the Illinois EPA of any deviation from the requirements of this permit, consistent with provisions in its CAAPP permit for reporting of deviations, e.g., reports shall describe the deviations, the probable cause of such deviations, the corrective actions taken, and any preventive measures taken.

- 7. The Permittee is allowed to operate the affected turbines with the Program under this construction permit until final action is taken by the Illinois EPA to address this Program in an operating permit for the source or other action is taken in an operating permit to address the requirements of 35 IAC Part 217, Subpart Q.

- 8a. As provided by 35 IAC 217.388(b), the Permittee may change the method of compliance with 35 IAC 217, Subpart Q from 35 IAC 217.388(a)(3)

(i.e., low usage unit) to 35 IAC 217.388(a)(1) or (a)(2). In such case, the Permittee shall notify the Illinois EPA at least 30 days in advance of the date that affected turbine(s) will comply with 35 IAC 217.388(a)(1) or (a)(2) if it is practical to do so or otherwise provide such notification as soon as it is practical to do so. As of the designated date (or January 1 of the next calendar year if required by 35 IAC 217.390(c)), the affected turbine(s) will no longer be considered affected turbine(s), the operation of such turbine(s) will no longer be included when determining compliance with the low usage limit in Condition 2(a), and such turbine(s) must comply by either 35 IAC 217.388(a)(1) or (a)(2). For this purpose, if turbine(s) would now comply by means of 35 IAC 217.388(a)(1), the "applicable compliance date," i.e., the date that the turbine(s) shall begin complying with the applicable standards, shall be the designated date, as provided by 35 IAC 217.388(b)(1).

Note: In such event, the Permittee must conduct testing and monitoring for the unit(s) that will cease to be low usage units in accordance with the requirements of 35 IAC 217.394(a) through (e), as applicable. For this purpose, references to the "applicable compliance date" in 35 IAC 217.394(a)(2) and (a)(3) shall mean the date by which compliance with 35 IAC 217.388(a)(1) or (a)(2) is to begin.

- b. In addition, if the Permittee is changing the method of compliance from 35 IAC 217.388(a)(3) to 35 IAC 217.388(a)(2), the provisions of 35 IAC 217.390(b), (c) and (d) shall also govern the change in the method of compliance. For example, a new averaging plan must be submitted and this plan must generally be received by the Illinois EPA by May 1 of a given calendar year if it is to be applicable in such year. As such, if turbines would now comply by means of 35 IAC 217.388(a)(2), compliance shall be addressed for the entire ozone season and calendar year.

If you have any questions on this permit, please call Manish Patel at 217/782-2113.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:MNP:psj

cc: FOS - Region 1, Illinois EPA
CAAPP Permit File - 95090081