

**STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT
TO OPERATE AIR EMISSIONS EQUIPMENT
THIS CERTIFIES THAT**

GenOn Wholesale Generation LP, Choctaw County Generating Station
2446 Highway 407
French Camp, Mississippi
Choctaw, County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: June 20, 2010

Modified Date: October 21, 2011

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: MAY 31 2015

Permit No.: 0400-00018

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SECTION 1. GENERAL CONDITIONS

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ 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 DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.
 - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct

emissions measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)

- (b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)
 - (c) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)
 - (d) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)
- 1.8 No permit revision 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 this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)
- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation

of credentials and other documents as may be required by law, to perform the following:

- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;
 - (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
 - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)

- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
 - (b) the changes do not exceed the emissions allowable under this permit;
 - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
 - (1) a brief description of the change(s),
 - (2) the date on which the change will occur,
 - (3) any change in emissions, and
 - (4) any permit term or condition that is no longer applicable as a result of the change;
 - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)
- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)
- 1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to

Construct in accordance with the provisions of Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

- (a) routine maintenance, repair, and replacement;
- (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
- (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
- (d) use of an alternative fuel or raw material by a stationary source which:
 - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
 - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
- (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
- (f) any change in ownership of the stationary source."

1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)

1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)

- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
 - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
 - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
 - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.
 - (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

- (2) the permitted facility was at the time being properly operated;
 - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - (4) the permittee submitted notice of the emergency to the DEQ within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
- (a) Upsets (as defined by APC-S-1, Section 2.34)
- (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
 - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
 - (ii) the source was at the time being properly operated;
 - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
 - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
 - (2) In any enforcement proceeding, the permittee seeking to establish the

occurrence of an upset has the burden of proof.

- (3) This provision is in addition to any upset provision contained in any applicable requirement.

(b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)

- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
 - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
 - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
 - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
- (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.

(c) Maintenance.

- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:
 - (i) the permittee can identify the need for the maintenance;
 - (ii) the source was at the time being properly operated;

- (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
 - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
 - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description ¹
AA-001	Source AA-001 is a 2126 MMBTUH, natural gas fired, combustion turbine with supplemental 258.9 MMBTUH duct burners. The unit has a Selective Catalytic Reduction (SCR) system for NO _x emissions control.
AA-002	Source AA-002 is a 2126 MMBTUH, natural gas fired, combustion turbine with supplemental 258.9 MMBTUH duct burners. The unit has a Selective Catalytic Reduction (SCR) system for NO _x emissions control.
AA-003	Source AA-003 is a 2126 MMBTUH, natural gas fired, combustion turbine with supplemental 258.9 MMBTUH duct burners. The unit has a Selective Catalytic Reduction (SCR) system for NO _x emissions control.
AA-004	Source AA-004 is a 32.66 MMBTUH Cleaver Brooks CB 1700800200 natural gas fired auxiliary boiler.
AA-005	Source AA-005 is a 1.97 MMBTUH, diesel fuel fired, emergency fire water pump.

- 1 Heat input capacities and source description contained in this permit are for informational purposes only. The emission limits are based on state and federal laws for natural gas fired units.

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.
 - (b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Issued: June 13, 2001 and Modified: November 23, 2004, June 17, 2008	3.B.2	Periods of Startup, shutdown, and Run back	<p>Comply with the short-term lbs/hr emissions limitations specified below, except during periods of startup, shutdowns, and run back.</p> <p>Comply with the long-term tons/year emissions even during periods of startup, shutdown, and run back</p> <p>A startup event begins at the moment the startup sequence is initiated by the facility operator and fuel flow is initiated into the specific combustion turbine (CT) and ends with the attainment of 60% load.</p> <p>A shutdown event begins at the moment the specific combustion turbine reduces load to 60% during a normal shutdown sequence initiated by the facility operator and ends with the termination of fuel flow to the specific CT.</p> <p>A run back event begins at the moment a process critical alarm causes the specific CT to drop below 60% load. The permittee has 60 minutes to return to or above 60% load or initiate shutdown procedures</p> <p>For periods of cold startup(turbine has not been fired in the last 48 hours), the permittee shall limit the period of the turbine and HRSG startup to six (6) hours or less. For all other startups(turbine has been fired within the previous 48 hours), the permittee shall limit the period of the turbine and HRSG startup to four (4) hours or less.</p> <p>For period of shutdown, the permittee shall limit the total shutdown time to three (3) hours or less.</p> <p>Permittee shall not use emission rates during periods of startup, shutdown, and run back in determining compliance with the 3 hour rolling average emission rates</p>
	40 CFR 72-78 Acid Rain Permit Issued: <u>April 9, 2002</u>	3.B.5	PM, PM ₁₀	20.59 lbs/hr and 90.18 tons/year; as established from a PSD BACT review
		3.B.4 &	SO ₂	1.38 lbs/hr and 6.04 tons/year; as

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003 (continued)	40 CFR 60.42a – Subpart Da for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 40 CFR 60.330 – Subpart GG for Stationary Gas Turbines	3.B.6		established from a PSD BACT review
		3.B.4 & 3.B.7	NO _x	3.5 ppmv at 15% O ₂ , Not to exceed 27.36 lbs/hr, both based on a 3-hour rolling average and 119.83 tons/year; as established from a PSD BACT review
		3.B.4 & 3.B.8	CO	18.36 ppmv at 15% O ₂ , Not to exceed 82.29 lbs/hr, both based on a 3-hour rolling average and 360.43 tons/year; as established from a PSD BACT review
		3.B.4	VOC	3.64 ppmv at 15% O ₂ , Not to exceed 9.33 lbs/hr, both based on a 3-hour rolling average and 40.86 tons/year; as established from a PSD BACT review
		3.B.4 3.B.10	Opacity	10% as established from a PSD BACT review
		3.B.11	Type of fuel	Shall not burn any fuel other than pipeline quality natural gas.
		1.A.23 1.A.24 & 3.B.3	Operating Load Range	Except for upsets, startups,, shutdowns, run backs, maintenance, or emergencies, the permittee shall not operate a CTG at less than 60%load.
		3.B.1	SO ₂ & NO _x	Subject to Acid Rain Program Regulations with the Phase II Acid Rain Permit in Appendix B
AA-004	PSD Construction Permit Issued on June 13, 2001. Modified on November 23, 2004, and <u>June 17, 2008</u> 40 CFR 60 Subpart Dc For Small Industrial-Commercial-Institutional Steam Generating Units	3.A.1 & 3.B.4	Opacity	40%
		3.B.11	Type of Fuel	Shall not burn any fuel other than pipeline quality gas.
		3.B.13	Operating Limitation	4000 hours per year based on a 12-month rolling total.
AA-005	PSD Construction Permit Issued on June 13, 2001. Modified on November 23, 2004, and <u>June 17, 2008</u>	3.A.1 & 3.B.4	Opacity	40%
		3.B.14	Operating Limitation	Limited to 500 hours per year on a 12 month rolling total and limited to two (2) hours testing per 7-day period, except during periods of emergency use, such as

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
				fire suppression and elimination.
		3.B.12	Fuel Sulfur content	Shall not burn any fuel which contains sulfur in excess of 0.8% by weight.

3.B.1 Emission Points AA-001, AA-002 and AA-003 are subject to the Acid Rain Program Regulations as specified in 40 CFR 72-78. The permittee must comply with all applicable requirements of said standards as specified in the Acid Rain Permit issued November 23, 2004 and attached to this permit in Appendix C.

3.B.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the following startup or shutdown requirements:

- (1) A startup event begins at the moment the startup sequence is initiated by the facility operator and fuel flow is initiated into the specific combustion turbine and ends with the attainment of 60% load. A shutdown event begins at the moment the specific combustion turbine reduces load to 60% during a normal shutdown sequence initiated by the facility operator and ends with the termination of fuel flow to the specific combustion turbine.
- (2) For periods of cold startup (turbine has not been fired in the last 48 hours), the permittee shall limit the period of the turbine startup to six (6) hours or less. For all other startups (turbine has been fired within the previous 48 hours), the permittee shall limit the period of the turbine startup to four (4) hours or less.
- (3) For periods of shutdown, the permittee shall limit the total shutdown time to three (3) hours or less.
- (4) Combustion turbine run back events refer to operations of any combustion turbine at or above 60% load when a process critical alarm causes the combustion turbine to drop load below 60% load prior to a fired shutdown being initiated.

During a combustion turbine run back the following conditions apply:

- a) At the start of a combustion turbine run back, the permittee shall be granted 60 minutes to either return to at or above 60% load or initiate shutdown procedures.
- b) Emissions of NO_x and CO will be considered startup or shutdown data for periods when the combustion turbine is operating below 60% load after a process critical alarm occurs when determining compliance with 3-hour rolling average emission rates.

- c) Run back occurrences shall be included in the quarterly reports.
- (5) The permittee shall keep a record of the duration of all startups or shutdowns of the associated combustion turbines. These records shall be kept and retained for a period of three (3) years and shall be made available to the Mississippi Department of Environmental Quality Office of Pollution Control, the Mississippi Environmental Quality Permit Board and/or their authorized representatives upon request. Such records shall include the time and date of such startups and shutdowns and confirmation that good air pollution control practices were followed.
- (6) The permittee shall not use emission rates during periods of startup, shutdown, or run back in determining compliance with the specified 3-hour rolling average emission rates.
- (7) The permittee shall comply with the specified short-term lbs/hr emission limitations except during periods of startup, shutdown, and run back. The permittee shall comply with the long-term tons/year emissions even during periods of startup, shutdown, and run back.(Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004, June 17, 2008).
- 3.B.3 For Emission Points AA-001, AA-002, and AA-003, except for upsets, startups, shutdowns, run backs, maintenance, or emergencies, the permittee shall not operate the CTG at less than 60% base load (Ref.: PSD Permit to Construct Issued June 13, 2001, modified November 23, 2004 and Section 1, General conditions, Items 1.23 and 1.24 of this permit).
- 3.B.4 For Emission Points, AA-001, AA-002, and AA-003, each turbine/heat recovery steam generating unit is subject to:
- 40 CFR 60.7 Notification and Recordkeeping Requirements,
 - 40 CFR 60.8 Performance Testing Requirements,
 - 40 CFR 60 Subpart Da (Electric Utility Steam Generating Units),
 - 40 CFR 60 Subpart GG (Stationary Gas Turbines), and/or;
 - 40 CFR 52.21 Prevention of Significant Deterioration (specifically BACT and National Ambient Air Quality Standard determinations) regulations.
- For Emission Point, AA-004, the boiler is subject to:
- 40 CFR 60.7 Notification and Recordkeeping Requirements,
 - 40 CFR 60.8 Performance Testing Requirements,
 - 40 CFR 60 Subpart Dc (Industrial-Commercial-Institutional Steam Generating Units),
 - 40 CFR 52.21 Prevention of Significant Deterioration (specifically BACT and National Ambient Air Quality Standard determinations) regulations.

The emission rates established in the PSD Permit to Construct and this Title V Permit to Operate were based on the most stringent emission rates calculated from the three regulations, which were driven by the BACT review and National Ambient Air Quality Standard analysis and resulting control equipment selection.

- 3.B.5 For Emission Points, AA-001, AA-002, and AA-003, the permittee shall be limited to a particulate matter (PM) and/or PM10 emission rate of 20.59 lbs/hr and 90.18 tons/year or less for each turbine (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.6 For Emission Points, AA-001, AA-002, and AA-003, the permittee shall be limited to a sulfur dioxide (SO₂) emission rate of 1.38 lbs/hr and 6.04 tons/year or less for each turbine (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.7 For Emission Points, AA-001, AA-002, and AA-003, the permittee shall be limited to a nitrogen oxides (NO_x) emission rate of 3.5 PPMV at 15% oxygen on a dry basis, not to exceed 27.36 lbs/hr, both limits are based on a 3-hour rolling average, and 119.83 tons/year or less for each turbine (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.8 For Emission Points, AA-001, AA-002, and AA-003, the permittee shall be limited to a carbon monoxide (CO) emission rate of 18.36 PPMV at 15% oxygen on a dry basis, not to exceed 82.29 lbs/hr, both limits are based on a 3-hour rolling average, and 360.43 tons/year or less for each turbine (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.9 For Emission Points, AA-001, AA-002, and AA-003, the permittee shall be limited to a volatile organic compound (VOC) emission rate of 3.64 PPMV at 15% oxygen on a dry basis, not to exceed 9.33 lbs/hr, both limits are based on a 3-hour rolling average, and 40.86 tons/year or less for each turbine (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.10 For Emission Points, AA-001, AA-002, and AA-003, the permittee shall be limited to a opacity of 10% or less for each turbine (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.11 For Emission Points, AA-001, AA-002, AA-003, and AA-004, the permittee shall not fire any fuel other than pipeline quality natural gas (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.12 For Emission Points, AA-001, AA-002, AA-003, AA-004, and AA-005, the permittee shall not burn any fuel that contains sulfur in excess of 0.8 percent by weight (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.13 For Emission Point AA-004, the permittee is limited to 4,000 hours per year operation on a 12 month rolling total (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).

- 3.B.14 For Emission Point AA-005, the permittee is limited to 500 hours per year operation on a 12 month rolling total, and limited to two (2) hours of testing per rolling 7-day period, except during periods of emergency use, such as fire suppression and elimination (Ref.: PSD Permit to Construct Issued June 13, 2001 and modified November 23, 2004).
- 3.B.15 Emission Point AA-005 is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), 40 CFR Part 63, Subpart ZZZZ. The unit is an existing emergency stationary RICE and is not required to meet the requirements of this standard or General Provisions, 40 CFR Part 63, Subpart A. (Ref.: 40 CFR 63.6585, 63.6590(a) (1) (iii) & 63.6590(b) (3))

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
APC-S-1, Section 3.4(a)(1)	3.C.1	PM	0.6 lbs/MMBTU
APC-S-1, Section 4.1(a)	3.C.2	SO ₂	4.8 lbs/MMBTU

- 3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.
- 3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

SECTION 4. COMPLIANCE SCHEDULE

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by March 1 for the preceding calendar year. Each compliance certification shall include the following:
- (a) The identification of each term or condition of the permit that is the basis of the certification;
 - (b) The compliance status;
 - (c) Whether compliance was continuous or intermittent;
 - (d) The method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
 - (e) Such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a. c., &d.)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING

REQUIREMENTS

- A. General Monitoring, Recordkeeping and Reporting Requirements
- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
 - (b) The date(s) analyses were performed;
 - (c) The company or entity that performed the analyses;
 - (d) The analytical techniques or methods used;
 - (e) The results of such analyses; and
 - (f) The operating conditions existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b. (1)(a)- (f))
- 5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b. (2))
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c. (1))
- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c. (2))
- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their

equivalents approved by the DEQ and the EPA.

- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001 AA-002 AA-003	Stack Testing for PM	Demonstrate compliance with emission limitations by stack testing in accordance with EPA Reference Methods and the requirements of the New Source Performance Standards for turbines and/or electric utility steam generating units or their approved equivalents. The permittee shall submit a test report of the results of the stack test biennially. Submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable and notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test	5.A.6 5.B.1	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority; Issued: June 13, 2001 and Modified: November 23, 2004 and <u>June 17, 2008</u> 40 CFR 60.42a – Subpart Da for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 40 CFR 60.7 – Subpart A General Provisions for Notifications
	NSPS Subpart GG Testing	Comply with the requirements listed in 40 CFR 60, Subpart GG, Section 60.335	5.B.2	
	NSPS Subpart Da Monitoring	Comply with the requirements listed in 40 CFR 60, Subpart Da, Section 60.47a., or an alternate monitoring method approved by EPA	5.B.3	40 CFR 60.330 – Subpart GG for Stationary Gas Turbines
	Startup, shutdown, runback	Keep a record of the duration of all startups, shutdowns, and runbacks of the associated combustion turbines. These records shall be made available to the Mississippi Department of Environmental Quality Office of Pollution Control, the Mississippi Environmental Quality Permit Board and/or their authorized representatives upon request. Such records shall include the time and date of such startups and shutdowns and confirmation that good air pollution control practices were followed	5.B.4	40 CFR 72-78 Acid Rain Permit Issued: <u>April 9, 2002</u>
	Monitoring for SO ₂	Comply with the SO ₂ monitoring requirements listed in 40 CFR 60, Subpart GG, Section 60.334	5.B.5	
	Monitoring for NO _x , CO, O ₂	Demonstrate compliance with nitrogen oxides, and carbon monoxide emission limitations using CEMS. Demonstrating compliance with NO _x and CO limits using CEMS data in lieu of EPA Reference Methods is an acceptable practice provided that the permittee meets the guidelines established in EPA's general guidance on "Alternative Testing and Monitoring Procedures for Combustion Turbines Regulated under New Source Performance Standards". This includes use of reference method test data collected during the Relative Accuracy Test Audits (RATA) required under 40 CFR 75	5.B.6	

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-001 AA-002 AA-003 (cont)		<p>Install, calibrate, maintain and operate continuous monitoring systems for NO_x (as specified in 40 CFR 60.334, Appendix B and 40 CFR 75), The monitoring systems must comply with all applicable requirements specified in 60.334, 60.13, and Appendix B of 40 CFR 60 and 40 CFR 75. In addition, the permittee must comply with the reporting and recordkeeping requirements specified in 40 CFR 60.7 and 40 CFR 75</p> <p>The permittee shall install, calibrate, maintain and operate continuous monitoring systems for CO (as specified in 40 CFR 60, Appendix B and Appendix F). The CGA, RA Audits shall be conducted according to 40 CFR 60, Appendix B and F. However, the frequency of the audit shall be as specified in 40 CFR 75, Appendix B, Section 2.2. The RATA required under 40 CFR 60, Appendix F, shall be at the frequency specified in 40 CFR 75, Appendix B, Section 2.3.1 and is as follows:</p> <p>A calendar quarter that does not qualify as QA operating quarter shall be excluded in determining the deadline for the next RATA. No more than eight successive calendar quarters shall elapse after the quarter in which a RATA was last performed without a subsequent RATA having been conducted. If the RATA has not been completed by the end of the eight calendar quarter since the quarter of the last RATA, then the RATA must be completed within a 720 unit (or stack) operating hour grace period following the end of the eighth successive elapsed calendar quarter. For the diluent monitors RATA may be performed annually (i.e., once every four successive QA operating quarters, rather than once every two successive QA operating quarters</p>	5.B.7	40 CFR 72-78 Acid Rain Permit Issued: <u>April 9, 2002</u>
AA-004	Monitor Fuel Usage	Record and maintain records of the amounts of each fuel combusted during each day	5.B.8	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority; Issued: <u>June 13, 2001</u> and Modified: <u>November 23, 2004</u> & <u>June 17, 2008</u> 40 CFR 60.42c – Subpart Dc for Industrial-Commercial-Institutional Steam Generating Units
	Monitor Operational Restriction	Monitor the hours of operation of the boiler on a daily basis	5.B.9	
	Keep Records of Daily Operation	Keep records of the boiler operation on a daily basis and a 12-month rolling total to demonstrate compliance with the 4,000 hours/year restriction	5.B.10	

Emission Point(s)	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-005	Monitor Operational Restriction	Monitor the hours of operation of the emergency engine on those days that the engine operates for testing or maintenance purposes.	5.B.11	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority; Issued: <u>June 13, 2001</u> and Modified: <u>November 23, 2004</u> & <u>June 17, 2008</u>
	Keep Records of Daily Operation	Keep records of the emergency engine operation for testing on a daily basis and a 12-month rolling total to demonstrate compliance with the 500 hours/year restriction	5.B.12	
	Keep Records of Daily Operation	Keep records of the emergency engine operation for testing purposes, on an hourly per rolling 7-day period basis	5.B.13	
	Keep Records of Fuel Sulfur Content	Keep records on site of the sulfur content for each shipment of diesel fuel received and stored in the fuel tank for firing this pump	5.B.14	

5.B.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with PM emission limitations by stack testing in accordance with EPA Reference Methods and the requirements of the New Source Performance Standards for turbines and/or electric utility steam generating units or their approved equivalents. The permittee shall submit a test report of the results of the stack test biennially.

The permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable and notify the DEQ in writing at least ten (10) days prior to the intended test date(s) so that an observer may be afforded the opportunity to witness the test.

5.B.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the testing and procedures requirements listed in 40 CFR 60, Subpart GG, Section 60.335.

5.B.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the monitoring requirements listed in 40 CFR 60, Subpart Da, Section 60.47a, or an alternate monitoring method approved by EPA.

5.B.4 For Emission Points AA-001, AA-002, and AA-003, the permittee shall maintain records of the occurrence and duration of any startup, shutdown, or runback of the combustion turbines in its operation; any upset of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. Such records shall include the time and date of such startups and shutdowns and confirmation that good air pollution control practices were followed. (Ref.: 40 CFR 60.7(b))

5.B.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the SO₂ monitoring requirements listed in 40 CFR 60, Subpart GG, Section 60.334.

5.B.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with nitrogen oxides, and carbon monoxide emission limitations using CEMS. Demonstrating compliance with NO_x and CO limits using CEMS data in lieu of EPA Reference Methods is an acceptable practice provided that the permittee meets the guidelines

established in EPA's general guidance on "Alternative Testing and Monitoring Procedures for Combustion Turbines Regulated under New Source Performance Standards". This includes use of reference method test data collected during the Relative Accuracy Test Audits (RATA) required under 40 CFR 75.

- 5.B.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall install, calibrate, maintain and operate continuous monitoring systems for NO_x (as specified in 40 CFR 60.334, Appendix B and 40 CFR 75), The monitoring systems must comply with all applicable requirements specified in 60.334, 60.13, and Appendix B of 40 CFR 60 and 40 CFR 75. In addition, the permittee must comply with the reporting and recordkeeping requirements specified in 40 CFR 60.7 and 40 CFR 75.

The permittee shall install, calibrate, maintain and operate continuous monitoring systems for CO (as specified in 40 CFR 60, Appendix B and Appendix F). The CGA, RA Audits shall be conducted according to 40 CFR 60, Appendix B and F. However, the frequency of the audit shall be as specified in 40 CFR 75, Appendix B, Section 2.2. The RATA required under 40 CFR 60, Appendix F, shall be at the frequency specified in 40 CFR 75, Appendix B, Section 2.3.1 and is as follows:

A calendar quarter that does not qualify as QA operating quarter shall be excluded in determining the deadline for the next RATA. No more than eight successive calendar quarters shall elapse after the quarter in which a RATA was last performed without a subsequent RATA having been conducted. If the RATA has not been completed by the end of the eighth calendar quarter since the quarter of the last RATA, then the RATA must be completed within a 720 unit (or stack) operating hour grace period following the end of the eighth successive elapsed calendar quarter. For the diluent monitors RATA may be performed annually (i.e., once every four successive QA operating quarters, rather than once every two successive QA operating quarters).

5. B.8 For Emission Point AA-004, the permittee shall record and maintain records of the amounts of each fuel combusted during each day.
5. B.9 For Emission Point AA-004, the permittee shall monitor the hours of operation of the boiler on a daily basis.
5. B.10 For Emission Point AA-004, the permittee shall keep records of the hourly boiler operation on a daily basis and a 12-month rolling total to demonstrate compliance with the 4,000 hours/year restriction.
5. B.11 For Emission Point AA-005, the permittee shall monitor the hours of operation of the emergency engine on those days that the engine operates for testing or maintenance purposes.
5. B.12 For Emission Point AA-005, the permittee shall keep records of the emergency engine operation for testing on a daily basis and a 12-month rolling total to demonstrate compliance with the 500 hours/year restriction
5. B.13 For Emission Point AA-005, the permittee shall keep records of the emergency engine operation for testing purposes, on an hourly per rolling 7-day period basis.
5. B.14 For Emission Point AA-005, the permittee shall keep records on site of the sulfur content for

each shipment of diesel fuel received and stored in the fuel tank for firing this pump.

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-001 AA-002 AA-003	Notification Requirements	Comply with the reporting requirements listed in 40 CFR 60, Subpart A, Section 60.7 and 60.8, Subpart Da, Subpart GG, and 40 CFR 75	5.C.1	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority; Issued: June 13, 2001 and Modified: <u>November 23, 2004</u>
	Submit Reports on Annual NO _x and CO Emissions	Submit semiannual reports providing the summary of emissions in tons/year of NO _x and CO based on CEM data for each consecutive 365-day rolling total in accordance with the provision 5.A.4.	5.C.2	40 CFR 60.42a – Subpart Da for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 40 CFR 60.7 and 60.8 – Subpart A General Provisions 40 CFR 60.330 – Subpart GG for Stationary Gas Turbines 40 CFR 72-78 Acid Rain Permit Issued: <u>April 9, 2002</u>
AA-004	Notification Requirements	Comply with the requirements listed in 40 CFR 60, Subpart A, Section 60.7 and 60.8, and 40 CFR 60, Subpart Dc	5.C.3	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority; Issued: June 13, 2001 and Modified: <u>November 23, 2004</u>
	Submit Records of Operation	Submit records in accordance with provision 5.A.4 above detailing the daily and 12-month rolling total hours of operation.	5.C.4	40 CFR 60.42c – Subpart Dc for Industrial-Commercial-Institutional Steam Generating Units
AA-005	Submit Records of Operation	Submit semi-annual records in accordance with provision 5.A.4 above detailing the daily and 12-month rolling total hours of operation	5.C.5	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority; Issued: June 13, 2001 and Modified: <u>November 23, 2004</u>
	Submit Records of Operation	Submit semi-annual records in accordance with provision 5.A.4 above detailing the operation of the pump for testing purposes	5.C.6	

5.C.1 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the reporting requirements listed in 40 CFR 60, Subpart A, Section 60.7 and 60.8, Subpart Da, Subpart GG, and 40 CFR 75.

5. C.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit, in accordance with the provision 5.A.4, semiannual reports providing the summary of emissions in tons/year of NO_x and CO based on CEM data for each consecutive 365-day rolling total.

5.C.3 For Emission Point AA-004, the permittee shall comply with the reporting requirements listed in 40 CFR 60, Subpart A, Section 60.7, 60.8, and Subpart Dc.

5. C.4 For Emission Point AA-004, the permittee shall submit semi-annual records in accordance

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with provision 5.A.4 above detailing the daily and 12-month rolling total hours of operation.

- 5. C.5 For Emission Point AA-005, the permittee shall submit semi-annual records in accordance with provision 5.A.4 above detailing the daily and 12-month rolling total hours of operation.
- 5. C.6 For Emission Point AA-005, the permittee shall submit semi-annual records in accordance with provision 5.A.4 above detailing the operation of the pump for testing purposes.

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
 - (a) All containers in which a class I or class II substance is stored or transported;
 - (b) All products containing a class I substance; and
 - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
 - (a) Servicing, maintaining, or repairing appliances;
 - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
 - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations,

persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
 - (b) Any person disposing of halons;
 - (c) Manufacturers of halon blends; or
 - (d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61
	or
	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 µm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

ACID RAIN PERMIT

ACID RAIN PERMIT

ACID RAIN PERMIT

Issued to: RRI Energy Wholesale Generation, LLC
Operated by: RRI Energy Wholesale Generation, LLC
ORIS code: 55706
Effective: January 1, 2007 through May 31, 2015

Summary of Previous Actions:

This page will be replaced to document new actions each time a new action is taken by the DEQ. This is the initial permitting action being undertaken:

1) Draft permit for public and EPA comment.	November 9, 2001
2) Permit finalized and issued.	April 9, 2002
3) Draft permit for public comment for permit renewal.	August 20, 2004
4) Draft permit for EPA comments for permit renewal	August 20, 2004
5) Permit finalized and issued.	November 23, 2004
6) Permit finalized and issued.	Permit date below.

Present Action:

1) Permit Renewal	
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Signature

Date

Harry M. Wilson, III, PE, Chief
Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385
Telephone: (601) 961-5171 Fax: (601) 961-5742

6-10-2010

Operated by: Reliant Energy Wholesale Generation, LLC
ORIS code: 55706
Effective: Same as Title V effective dates

ACID RAIN PERMIT CONTENTS:

- 1) Statement of Basis.
- 2) SO₂ allowances allocated under this permit and NO_x requirements for each affected unit.
- 3) Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process, and any additional requirements or conditions.
- 4) The permit application submitted for this source. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

1) STATEMENT OF BASIS:

Statutory and Regulatory Authorities: In accordance with the Mississippi Air and Water

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Pollution Control Law, specifically Miss. Code Ann. §§ 49-17-1 through 49-17-43, and any subsequent amendments, and Titles IV and V of the Clean Air Act, the Mississippi Department of Environmental Quality issues this permit pursuant to the State of Mississippi Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act, Regulation APC-S-6, and the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act, Regulation APC-S-7.

2) SO₂ ALLOWANCE ALLOCATIONS AND NO_x REQUIREMENTS FOR EACH AFFECTED UNIT:

		2007	2008	2009	2010	2011-2015
CTG1 CTG2 CTG3	SO ₂ allowances, under Tables 2, 3, or 4 of 40 CFR Part 73.	N/A	N/A	N/A	N/A	N/A
	NO _x limit	N/A				

3) COMMENTS, NOTES, AND JUSTIFICATIONS: All affected units are natural gas/#2 fuel oil fired units; therefore, the affected units are not subject to the NO_x requirements outlined in 40 CFR Part 76. Additionally, these are new units that were not listed in 40 CFR Part 73, Tables 2, 3, or 4, and have not been allocated any SO₂ allowances.

4) PHASE II PERMIT APPLICATION: Attached