

**STATE OF MISSISSIPPI
AIR POLLUTION CONCSAPROL
TITLE V PERMIT**

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

TVA Magnolia Combined Cycle
352 Highway 4 West
Ashland, Mississippi
Benton 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 15, 2020

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

Krystal Rudolph

AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: May 31, 2025

Permit No.: 0200-00019

TABLE OF CONTENTS

SECTION 1. GENERAL CONDITIONS.....	3
SECTION 2. EMISSION POINTS & POLLUTION CONTROLDEVICES	13
SECTION 3. EMISSION LIMITATIONS & STANDARDS	14
SECTION 4. COMPLIANCE SCHEDULE	33
SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS	34
SECTION 6. ALTERNATIVE OPERATING SCENARIOS	52
SECTION 7. TITLE VI REQUIREMENTS	53
SECTION 8. ACID RAIN REQUIREMENTS.....	55
SECTION 9. CROSS STATE AIR POLLUTION RULE.....	56

APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT
APPENDIX B ACID RAIN PERMIT

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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)
- 1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.
 - (a) This permit shall be reopened and revised under any of the following circumstances:
 - (1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.
 - (2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
 - (4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
 - (b) Proceedings to reopen and issue this permit shall follow the same procedures as apply

to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

- (c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

- 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)
- 1.6 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)
- 1.7 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)
- 1.8 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 11 Miss. Admin. Code Pt. 2, Ch. 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 judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.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.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)
- 1.9 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)
- 1.10 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.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)
- 1.11 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

- 1.12 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)
- 1.13 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)
- 1.14 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)
- 1.15 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

1.16 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

1.17 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.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 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.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.19 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 11

Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

- 1.21 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)
- 1.22 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)
- 1.23 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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)
- 1.24 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

- a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
 - (1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:
 - (i) An upset occurred and that the source can identify the cause(s) of

the upset;

- (ii) The source was at the time being properly operated;
 - (iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;
 - (iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;
 - (v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department
- (2) In any enforcement proceeding by the Commission, the source 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.
 - (4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.
- b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)
- 1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.
 - 2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).
 - 3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see

the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

- 1.26 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 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Reference Number	Description
AA-001	MCC01	2,336 MMBtu/hr (170 MW) Combined Cycle Generator Natural gas-fired Combustion Turbine Generator, Steam Turbine Generator, and Heat Recovery Steam Generator with Selective Catalytic Reduction and Duct Burner 1726.1 MMBtu/hr for CTG and 610.5 MMBtu/hr for HRSG
AA-002	MCC02	2,336 MMBtu/hr (170 MW) Combined Cycle Generator Natural gas-fired Combustion Turbine Generator, Steam Turbine Generator, and Heat Recovery Steam Generator with Selective Catalytic Reduction and Duct Burner 1726.1 MMBtu/hr for CTG and 610.5 MMBtu/hr for HRSG
AA-003	MCC03	2,336 MMBtu/hr (170 MW) Combined Cycle Generator Natural gas-fired Combustion Turbine Generator, Steam Turbine Generator, and Heat Recovery Steam Generator with Selective Catalytic Reduction and Duct Burner 1726.1 MMBtu/hr for CTG and 610.5 MMBtu/hr for HRSG
AA-004	AB01	69.8 MMBtu/hr Auxiliary Boiler Natural Gas-Fired
AA-005	CT-1	Five Cell Cooling Tower
AA-006	CT-2	Five Cell Cooling Tower
AA-007	CT-3	Five Cell Cooling Tower
AA-009	---	1.89 MMBtu/hr (270 hp) Emergency Fire Pump Engine Manufactured: 2002 Diesel-fired Compression Ignition Internal Reciprocating Engine Emergency RICE < 500 HP
AA-010	AC01	0.84 MMBtu/hr (115 hp) Air Compressor Manufactured: 2014 Diesel-fired Compression Ignition Internal Reciprocating Engine 4-Stroke Controls: Particulate Filter and Oxidation Catalyst Displacement < 10 Liters

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.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

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 Condition 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

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	Acid Rain Program Regulations, 40 CFR 72-78	3.B.1	NO _x SO ₂ CO ₂	General Applicability
	40 CFR 60, Subpart Da (Standards of Performance for Electric Utility Steam Generating Units) 40 CFR 60.40Da(a), (e)(2)	3.B.2	SO ₂ NO _x	General Applicability
	40 CFR 60.42Da(f)(1), 60.43Da(b)(1) and (2), 60.44Da(d)(1), Subpart Da	3.B.3	SO ₂	Emissions shall not exceed 0.80 lbs/MMBtu and 10 percent of the potential combustion concentration or 0.20 lbs/MMBtu and 100 percent of the combustion concentration
			NO _x	1.6 lbs/MWh heat input.
	40 CFR 60, Subpart GG (Standards of Performance for Stationary Gas Turbines) 40 CFR Part 60.330(a)	3.B.4	NO _x SO ₂	General Applicability
	PSD Construction Permit issued on May 31, 2001, and modified on June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020 40 CFR 60.333(b), Subpart GG	3.B.5	Fuel Sulfur Content	0.8% by weight
	PSD Construction Permit issued on May 31, 2001, and modified on June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020	3.B.6	SCR Operation	SCR will be included for control of NO _x emissions and operated as soon as and as long as the unit operating conditions are amenable to its effective use.
3.B.7		Fuel Requirement	Natural gas only	

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003 All Methods of Operation	PSD Construction Permit issued on May 31, 2001, and modified on June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020	3.B.8	Smoke	Opacity ≤ 10%
		3.B.9	PM (Filterable Only) PM ₁₀ /PM _{2.5}	351 tpy based on a 12-month rolling total
			SO ₂	15.5 tpy based on a 12-month rolling total
			NO _x	530 tpy based on a 12-month rolling total
			CO	1,792 tpy based on a 12-month rolling total
			NM VOC	227 tpy based on a 12-month rolling total
AA-001 AA-002 AA-003 With Ducts Firing	PSD Construction Permit issued on May 31, 2001, and modified on June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020 40 CFR 60.332(a)(1) and (b), Subpart GG	3.B.10	PM (Filterable Only) PM ₁₀ /PM _{2.5}	27.3 lbs/hr
			SO ₂	7.4 lbs/hr
			NO _x	3.5 ppm @ 15% oxygen on a dry basis, not to exceed 34.3 lbs/hr, both limits are based on a 3-hr rolling average
			CO	10 ppm @ 15% oxygen on a dry basis, not to exceed 97.9 lbs/hr, both limits are based on a 3-hr rolling average
			NM VOC	16.4 lbs/hr
			GHG	1,000 lbs CO ₂ per MW-hour (12-month rolling average)

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-001 AA-002 AA-003 Without Ducts Firing	PSD Construction Permit issued on May 31, 2001, and modified on June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020 40 CFR 60.332(a)(1) and (b), Subpart GG	3.B.11	PM (Filterable Only) PM ₁₀ /PM _{2.5}	20.5 lbs/hr
			SO ₂	5.9 lbs/hr
			NO _x	3.5 ppm at 15% oxygen on a dry basis, not to exceed 27.9 lbs/hr, both limits are based on a 3-hr rolling average.
			CO	7.6 ppm @ 15% oxygen on a dry basis, not to exceed 33.5 lbs/hr, both limits are based on a 3-hr rolling average
			NMVOC	3.2 lbs/hr
			GHG	1,000 lbs CO ₂ per MW-hour (12-month rolling average)
AA-001 AA-002 AA-003 AA-004	11 Miss. Admin. Code Pt. 2, R.1.3.D(1)(b).	3.B.12	PM (Filterable Only)	Emissions shall not exceed $E = 0.8808 * F^{0.1667}$
AA-004 AA-001 AA-002 AA-003 With Ducts Firing	11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	3.B.13	SO ₂	Emissions shall not exceed 4.8 lbs/MMBtu
AA-004	PSD Construction Permit issued on May 31, 2001, and modified on June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020	3.B.14	Hours of Operation	4,500 hrs/yr on a rolling 12-month total
		3.B.15	NO _x	6.2 lbs/hr and 13.95 TPY
			Smoke	Opacity ≤ 10%
	40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) 40 CFR 60.40c(a), Subpart Dc	3.B.16	SO ₂ PM	General Applicability

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
AA-009	40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) 40 CFR 63.6585(c), 63.6590(a)(1)(iii)	3.B.17	HAPs	General Applicability
	40 CFR 63.6603(a), Item 4 of Table 2d, Subpart ZZZZ	3.B.18		Work Practice Standards
	40 CFR 63.6605, Subpart ZZZZ	3.B.19		General Provisions
	40 CFR 63.6625(e), (f), (h), (i), Subpart ZZZZ	3.B.20		Operational Requirement
	40 CFR 63.6640(f)(1), (2)(i), (4), Subpart ZZZZ	3.B.21		
AA-009 AA-010	11 Miss. Admin. Code Pt. 2,R.1.3.D(1)(b).	3.B.22	PM (Filterable Only)	Emissions shall not exceed 0.6 MMBtu/hr
AA-010	40 CFR 60, Subpart III (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) 40 CFR 60.4200(a)(2)(i), (c)	3.B.23	PM NO _x	General Applicability
	40 CFR 60.4201(a), 60.4204(b), Subpart III 40 CFR 1039.102, Subpart B (Emission Standards and Certification Provisions) Table 5 of 40 CFR 1039.102	3.B.24	PM NO _x NMHC CO	Operational Requirements
	Title V Operating Permit issued June 15, 2020 11 Miss. Admin. Code Pt. 2, R.2.2.B(10).	3.B.25	Hours of Operation	Shall not operate more than 2,080 hours per year
	Fuel Sulfur Content		Fuel sulfur content shall not exceed 0.0015 percent 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 shall comply with all applicable requirements of said standards as included in Section 8.0 and specified in the Acid Rain Permit attached to this permit in Appendix B.

(Ref.: 40 CFR Parts 72-78)

3.B.2 For the duct burners associated with Emission Points AA-001, AA-002, and AA-003, the permittee is subject to and shall comply with all applicable regulations of the Standards of Performance for Electric Utility Steam Generating Units (40 CFR 60, Subpart Da) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.40Da(a), (e)(1), (2), Subpart Da)

3.B.3 For the duct burners associated with Emission Points AA-001, AA-002, and AA-003, the permittee shall not cause a discharge into the atmosphere of any gases that contain the following:

a) SO₂ in excess of 0.80 lbs/MMBtu heat input and 10 percent of the potential combustion concentration or 0.20 lbs/MMBtu and 100 percent of the combustion concentration.

b) NO_x in excess of 1.6 lbs/MWh heat input.

(Ref.: 40 CFR 60.42Da(f)(1), 60.43Da(b)(1) and (2), 60.44Da(d)(1), Subpart Da)

3.B.4 For the combustion turbines associated with Emission Points AA-001, AA-002, and AA-003, the permittee is subject to and shall comply with all applicable regulations of the Standards of Performance for Stationary Gas Turbines (40 CFR 60, Subpart GG) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.330(a), Subpart GG)

3.B.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall not use any fuel which contains sulfur in excess of 0.8 percent by weight.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, June 15, 2020; 40 CFR 60.333(b), Subpart GG)

3.B.6 For Emission Points AA-001, AA-002, and AA-003, the permittee shall use a selective catalytic reduction (SCR) for control of NO_x emissions and operated as soon as and as long as the unit operating conditions are amenable to its effective use.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

3.B.7 For Emission Points AA-001, AA-002, and AA-003, the permittee shall only combust natural gas.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

3.B.8 Emission Points AA-001, AA-002, and AA-003, the permittee shall not cause, permit, or allow the emission of smoke into the open air which exceed 10 percent opacity.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

3.B.9 For Emission Points AA-001, AA-002, and AA-003, the permittee shall comply with the following limitations at all times, based on a 12-month rolling total:

Pollutant	Limitation/Standard Requirement
Particulate Matter (PM)	351 tpy, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A.
Particulate Matter diameter less than 10 microns (PM ₁₀)	351 tpy, as determined by EPA Reference Methods 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M.
Particulate Matter diameter less than 2.5 microns (PM _{2.5})	351 tpy, as determined by EPA Reference Methods 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M.
Sulfur Dioxide (SO ₂)	15.5 tpy, as determined by EPA Reference Method 6, 40 CFR 60, Appendix A.
Nitrogen Oxides (NO _x)	530 tpy, as determined by EPA Reference Method 7E and 3A, 40 CFR 60, Appendix A.
Carbon Monoxide (CO)	1,792 tpy, as determined by EPA Reference Method 10, 40 CFR 60, Appendix A.
Non-methane VOC (NMVOC)	227 tpy, as determined by EPA Reference Method 25, 40 CFR 60, Appendix A.

The ton per year limit is for all combustion turbines (Emission Points AA-001, AA-002, and AA-003) combined and should include all methods of operation.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

For Emission Points AA-001, AA-002 and AA-003, the permittee shall comply with the emission limitations and monitoring requirements of Condition 3.B.9 at all times including periods of startup, shutdown and tuning sessions. Except for upsets, startups, shutdowns, and tuning sessions, the permittee shall operate under normal operating conditions, which is defined beginning at the point when the turbine combustion system has reached Mode 6Q and thirty (30) minutes after ammonia flow to the SCR system has commenced.

A startup event shall not exceed 6.0 hour duration and a shutdown event shall not exceed a 1.0 hour duration. A period of startup is defined as commencing when fuel is first combusted in the combustion turbine, and ending when the turbine combustion system has reached stable combustion dynamics in Mode 6Q and thirty (30) minutes after ammonia flow to the SCR system has commenced. Shutdown shall be defined as the period beginning when the combustion turbine leaves operational Mode 6Q and ending when combustion has ceased. The permittee shall monitor and maintain records of the duration of time each emission point engages in periods of both startups and shutdowns. Tuning sessions will normally occur because of required seasonal tuning, after a combustor change-out, after a major repair or maintenance to a combustor, or other similar maintenance circumstance. Tuning sessions are completed periodically to optimize combustion or emission reductions from the turbine. Tuning sessions must be performed in accordance with the manufacturer's recommendations. During the tuning session, all reasonable steps to minimize levels of emissions that exceed the limits of this permit shall be taken. The permittee shall submit notice of tuning events to the DEQ within five (5) working days of the time the tuning event began.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

3.B.10 When Emission Points AA-001, AA-002, and AA-003 are operating with the ducts firing, the permittee shall not allow the emission of PM, PM₁₀, PM_{2.5}, SO₂, NO_x, CO, and NMVOC to exceed the standards listed in the table below while the duct burners are firing except during periods of startup, shutdown, and tuning sessions. The permittee is allowed to exclude from the three (3) hour rolling average any hour in which duct burners startup within the last 15 minutes of any hour. The permittee shall comply with the GHG emission limitations in the table below except during periods of startup, shutdown, and tuning sessions.

Pollutant	Limitation/Standard Requirement
PM	27.3 lbs/hr, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A.
PM ₁₀	27.3 lbs/hr, as determined by EPA Reference Methods 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M.
PM _{2.5}	27.3 lbs/hr, as determined by EPA Reference Methods 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M.
SO ₂	7.4 lbs/hr, as determined by EPA Reference Method 6, 40 CFR 60, Appendix A.
NO _x	3.5 PPM at 15% oxygen on a dry basis, not to exceed 34.3 lbs/hr, both limits are based on a 3-hr rolling average, as determined by EPA Reference Method 7E and 3A, 40 CFR 60, Appendix
CO	10 PPM at 15% oxygen on a dry basis, not to exceed 97.9 lbs/hr, both limits are based on a 3-hr rolling average, as determined by EPA Reference Method 10, 40 CFR 60, Appendix A.
NMVOC	16.4 lbs/hr, as determined by EPA Reference Method 25, 40 CFR 60, Appendix A.
GHG	12-month rolling average of 1,000 lbs CO ₂ per MW-hr (gross) based on combustion design and practices.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020; 40 CFR 60.330(a)(1), (b), Subpart GG)

3.B.11 When Emission Points AA-001, AA-002, and AA-003 are operating without the ducts firing, the permittee shall not allow the emission of PM, PM₁₀, PM_{2.5}, SO₂, NO_x, CO, and NMVOC to exceed the standards listed in the table except during periods of startup, shutdown, and tuning sessions. The permittee shall comply with the GHG emission limitations in the table below except during periods of startup, shutdown, and tuning sessions.

Pollutant	Limitation/Standard Requirement
PM	20.5 lbs/hr, as determined by EPA Reference Methods 1-5, 40 CFR 60, Appendix A.
PM ₁₀	20.5 lbs/hr as determined by EPA Reference Methods 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M.
PM _{2.5}	20.5 lbs/hr as determined by EPA Reference Methods 201 or 201A in conjunction with Reference Method 202, 40 CFR 51, Appendix M.
SO ₂	5.9 lb/hr, as determined by EPA Reference Method 6, 40 CFR 60, Appendix A.
NO _x	3.5 ppm at 15% oxygen on a dry basis, not to exceed 27.9 lbs/hr, both limits are based on a 3-hr rolling average, as determined by EPA Reference Method 7E, 40 CFR 60, Appendix A.
CO	7.6 PPM at 15% oxygen on a dry basis, not to exceed 33.5 lbs/hr, both limits are based on a 3-hr rolling average, as determined by EPA Reference Method 10, 40 CFR 60, Appendix A.
NMVOC	3.2 lbs/hr, as determined by EPA Reference Method 25, 40 CFR 60, Appendix A.
GHG	12-month rolling average of 1,000 lbs CO ₂ per MW-hr (gross) based on combustion design and practices.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020; 40 CFR Part 60.330(a)(1) and (b), Subpart GG)

3.B.12 For Emission Points AA-001, AA-002, AA-003, and AA-004, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of equal to or greater than 10 MMBtu/hr heat input but less than 10,000 MMBtu/hr heat input shall not exceed an emission rate as determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pound per MMBtu/hr heat input and I is the heat input in millions of BTU per hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

3.B.13 For Emissions Point AA-004 and while the ducts of Emission Points AA-001, AA-002, and AA-003 are firing, the permittee shall not discharge sulfur oxides from any fuel burning installation in which fuel is burned primarily to produce heat or power by indirect heat transfer in excess of 4.8 pounds (measured as sulfur dioxide) per million BTU heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

3.B.14 For Emission Point AA-004, the permittee shall not exceed 4,500 hours per year of operation on a rolling 12-month total.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

3.B.15 For Emission Point AA-004, the permittee shall not allow the emission of NO_x to exceed 6.2 lbs/hr and 13.95 tpy, as determined by EPA Reference Method 20. The permittee shall not cause, permit, or allow the emission of smoke into the open air which exceeds ten (10) percent opacity as determined by EPA Reference Method 9.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

3.B.16 For Emission Point AA-004, the permittee is subject to and shall comply with all requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.40c(a), Subpart Dc)

3.B.17 For Emission Point AA-009, the permittee is subject to and shall comply with all requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and General Provisions (40 CFR 63, Subpart A).

(Ref.: 40 CFR 63.6585(c), 63.6590(a)(1)(iii), Subpart ZZZZ)

3.B.18 For Emission Point AA-009, the permittee shall comply with the following work practice standards:

- a) Change oil and filter every 500 hours of operation or annually, whichever comes first.
- b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.
- c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

(Ref.: 40 CFR 63.6603(a), Item 4 of Table 2d, Subpart ZZZZ)

3.B.19 For Emission Point AA-009, the permittee shall be in compliance with the emission limitations, operating limitations, and other requirements of Subpart ZZZZ that apply at all times.

At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to MDEQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(Ref.: 40 CFR 63.6605, Subpart ZZZZ)

3.B.20 For Emission Point AA-009, the permittee shall operate and maintain the stationary RICE according to the following:

- a) The permittee shall operate and maintain the engine according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- b) The permittee shall install a non-resettable hour meter if one is not already installed.
- c) The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- d) The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 3.B.19. The oil analysis must be

performed at the same frequency specified for changing the oil in Condition 3.B.19. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within 2 business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

(Ref.: 40 CFR 63.6625(e), (f), (h), (i), Subpart ZZZZ)

- 3.B.21 For Emission Point AA-009, the permittee shall operate the emergency stationary RICE according to the requirements in paragraphs (a) through (c) of this condition. In order for the engine to be considered an emergency stationary RICE under Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (a) through (c) of this condition, is prohibited. If you do not operate the engine according to the requirements in paragraphs (a) through (c) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.
- a) There is no time limit on the use of emergency stationary RICE in emergency situations.

- b) The permittee may operate the emergency stationary RICE for the purposes specified in the following paragraph for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) of this condition counts as part of the 100 hours per calendar year allowed by paragraph (b).

Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition MDEQ for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

- c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (b) of this condition.

(Ref.: 40 CFR 63.6640(f)(1), (2)(i), (4), Subpart ZZZZ)

3.B.22 For Emission Points AA-009 and AA-010, the maximum permissible emission of ash and/or particulate matter from the fossil fuel burning installation of less than 10 MMBtu/hr heat input shall not exceed 0.6 lbs/MMBtu heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2,R.1.3.D(1)(b).)

3.B.23 For Emission Point AA-010, the permittee is subject to and shall comply with all applicable regulations of the Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60, Subpart IIII) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.4200(a)(2)(i), (c), Subpart IIII)

3.B.24 For Emission Point AA-010, the permittee is subject to and shall comply with all applicable standards in 40 CFR 1039.102, including but not limited to the following emission standards:

Pollutant	Limitation/Standard Requirement
PM	0.20 gram/kW-hr
NO _x	0.40 gram/kW-hr
NMHC	0.19 gram/kW-hr
CO	5.0 gram/kW-hr

(Ref.: 40 CFR 60.4201(a), 60.4204(b), Subpart IIII; Table 5 of 40 CFR 1039.102, Subpart B)

3.B.25 For Emission Point AA-010, the permittee shall operate the engine according to the following requirements:

- a) The engine shall not operate more than 2,080 hours per year on a rolling 12-month total.
- b) The permittee shall combust No. 2 fuel oil with a maximum sulfur content of 0.0015 percent by weight or lower.

(Ref.: Title V Operating Permit June 15, 2020; 11 Miss. Admin. Code Pt. 2, R.2.2.B(10).)

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limitation/Standard Requirement
11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.C.1	PM	0.6 lbs/MMBTU
11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).	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.
 (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

- 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.
 (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.4.A(1).)

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 January 31 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, 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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31st and January 31st 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 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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.: 11 Miss. Admin. Code Pt. 2, R. 6.3.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 MDEQ and the EPA.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.8 For the entire facility, if an emission point is required to conduct a performance test, 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. For subsequent tests, the submittal of the test protocol requirement may be waived provided the protocol will not change and a request confirming such is made to the MDEQ. The permittee shall notify the MDEQ 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 any test(s).

The permittee shall submit the corresponding test report within sixty (60) days of completion of the stack test.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3)(c)(1).)

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter(s)	Monitoring/Recordkeeping Requirement
AA-001 AA-002 AA-003	PSD Permit to Construct issued May 31, 2001 Modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020	5.B.1	NO _x CO	CEMS Monitoring Requirement
		5.B.2	PM/PM ₁₀ /PM _{2.5} SO ₂ NO _x CO NMVOC	Recordkeeping Requirement
		5.B.3		
	40 CFR 60.49Da, 60.52Da, Subpart Da	5.B.4	SO ₂ NO _x	Monitoring Requirement
	40 CFR 60.334(b)(2), Subpart GG; 40 CFR 75.2, Subpart A	5.B.5	SO ₂ NO _x	CEMS Monitoring Requirement
	40 CFR 60.334(h)(3), Subpart GG	5.B.6		Monitoring Requirement
	11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3).	5.B.7	Fuel Requirement	Monitoring Requirement
	Title V Operating Permit issued June 15, 2020 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.B.8	NMVOC	Performance Testing Requirement
AA-001 AA-002 AA-003 AA-004	PSD Permit to Construct issued May 31, 2001 Modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020	5.B.9	PM/PM ₁₀ /PM _{2.5} SO ₂ NO _x CO NMVOC	Recordkeeping Requirement
		5.B.10	Smoke	Monitoring Requirement
AA-004	Title V Operating Permit issued June 15, 2020 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3).	5.B.11	Hours of Operation	Recordkeeping Requirement
AA-004	Title V Operating Permit issued June 15, 2020 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3.)	5.B.12	NO _x	Performance Testing Requirement
	40 CFR 60.48c(g), Subpart Dc	5.B.13	Fuel Requirement	Recordkeeping Requirement

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter(s)	Monitoring/Recordkeeping Requirement
AA-009	40 CFR 60.6640(a), (b), Item 9 of Table 6, Subpart ZZZZ	5.B.14	HAPs	Continuous Compliance Requirement
	40 CFR 63.6655(a)(1), (2), (4), (d), (e), (f)(2), 63.6660, Subpart ZZZZ	5.B.15		Recordkeeping Requirement
AA-010	40 CFR 60.4209(b), Subpart III	5.B.16	PM NO _x	Install a Backpressure Monitor
	40 CFR 60.4211(a), (c), Subpart III	5.B.17		Compliance Demonstration
	40 CFR 60.4211(g), 60.4211(g)(2), Subpart III	5.B.18		Deviation Requirements
	Title V Operating Permit issued June 15, 2020 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3).	5.B.19		Recordkeeping Requirements

5.B.1 For Emission Points AA-001, AA-002 and AA-003, the permittee shall demonstrate compliance with NO_x and CO 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 Part 75.

The NO_x, CO, and O₂ CEM systems shall also be capable of and certified to accurately read/measure NO_x and CO concentrations to comply with the tpy limit

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

5.B.2 For Emission Point AA-001, AA-002, and AA-003, the permittee shall monitor and record the duration of periods of startup, shutdown and tuning sessions for each emission point. The permittee shall operate the emission points in a manner consistent with good combustion practices, in accordance with the manufacturer's guidelines and procedures to minimize emissions during startup, shutdown, and tuning sessions.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

5.B.3 For Emission Point AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with Conditions 3.B.9, 3.B.11, and 3.B.12 by calculating and maintaining records of PM/PM₁₀/PM_{2.5}, SO₂, NO_x, CO, and NMVOC emissions in lbs/hr and on a 12-month rolling total in tpy.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

5.B.4 For Emission Points AA-001, AA-002, and AA-003, the permittee is subject to and shall comply with all applicable monitoring and recordkeeping requirements of the Standards of Performance for Electric Utility Steam Generating Units (40 CFR 60, Subpart Da) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.49Da, 60.52Da, Subpart Da)

5.B.5 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 Part 75. The monitoring systems must comply with all applicable requirements specified in 60.334, 60.13, and Appendix B of 40 CFR Part 60 and 40 CFR Part 75. In addition, the permittee must comply with the reporting and recordkeeping requirements specified in 40 CFR Part 60.7 and 40 CFR Part 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 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).

The NO_x and CO continuous emissions monitoring system (CEMS) shall also be capable of and certified to accurately read and measure NO_x and CO concentrations to comply with the tpy limit in Condition 3.B.9.

(Ref.: 40 CFR 60.334(b)(2), Subpart GG; 40 CFR 75.2, Subpart A)

5.B.6 For Emission Points AA-001, AA-002 and AA-003, the permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the permittee is in compliance with Condition 3.B.5, regardless of whether an existing custom schedule approved by MDEQ for Subpart GG requires such monitoring. The permittee shall use one of the following sources of information to make the required demonstration:

- 1) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
- 2) Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of Appendix D to Part 75 of this chapter is required.

(Ref.: 40 CFR Part 60.334(h)(3), Subpart GG)

5.B.7 For Emission Point AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with Condition 3.B.7 by keeping records of the amount and fuel type combusted by the emission points.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.(A)(3).)

5.B.8 For Emission Points AA-001, AA-002, and AA-003, the permittee shall demonstrate compliance with the NMVOC limitation of Condition 3.B.9 by conducting a stack test for each emission point during normal operating conditions. Emission Points AA-001, AA-002, and AA-003 shall be tested once every five (5) years, not to exceed 61 months from the previous stack test. Each stack test shall be conducted in accordance with EPA Reference Method 25 or an approved equivalent test method.

(Ref.: Title V Operating Permit issued June 15, 2020; 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.B.9 For Emission Points AA-001, AA-002, AA-003, and AA-004, a record of operation of the associated combustion turbines, duct burners, and SCR systems shall be kept and retained for a period of five (5) years and shall be made available to MDEQ upon request. Records shall include the date and time operation begins and ends for each emission point, as well as confirmation that good air pollution control practices, as provided in this permit, were followed.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

5.B.10 For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall demonstrate compliance annually with the opacity limit by conducting a Visual Determination using EPA Reference Method 22. If visible emissions are observed during the annual Method 22 evaluation, the permittee shall conduct a Visible Emissions Evaluation (VEE) per EPA Reference Method 9 within seven (7) days of the Method 22 evaluation to demonstrate compliance with the 10% opacity limit.

(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)

5.B.11 For Emission Point AA-004, the permittee shall demonstrate compliance with Condition 3.B.14 by keeping and maintaining records of the hours of operation on a 12-month rolling total.

(Ref.: Title V Operating Permit issued June 15, 2020; 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3).)

5.B.12 For Emission Point AA-004, the permittee shall demonstrate compliance with the NO_x standard of Condition 3.B.15 by performing a stack test for NO_x emissions using EPA Test Method 20 or any other EPA approved method in order to satisfy the limitation in Condition 3.B.15. The stack test shall be performed once every five (5) years not to exceed 61 months from the previous stack test.

(Ref.: Title V Operating Permit issued June 15, 2020; 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3).)

5.B.13 For Emission Point AA-004, the permittee shall keep and maintain records of the amount of fuel combusted during each operating day to demonstrate compliance with Condition 3.B.16.

(Ref.: 40 CFR 60.48c(g)(1), Subpart Dc)

5.B.14 For Emission Point AA-009, the permittee shall demonstrate continuous compliance with Condition 3.B.20 by meeting the following compliance requirements:

- a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions.
- b) Develop and follow a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

The permittee shall report each instance in which Condition 3.B.20 was not met. These instances are deviations from the operating limitations, and these deviations must be reported in accordance with Condition 5.A.5.

(Ref.: 40 CFR 60.6640(a), (b), Item 9 of Table 6, Subpart ZZZZ)

5.B.15 For Emission Point AA-009, the permittee shall keep the following records:

- a) A copy of each report submitted to comply with Subpart ZZZZ.
- b) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.
- c) Records of all required maintenance performed on the air pollution control and monitoring equipment.

The permittee shall keep the records required in Condition 5.B.15 to show continuous compliance with each emission or operating limitation that applies to the facility.

The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE according to the maintenance plan.

The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

The records required above shall be kept in a form that is readily accessible in either hardcopy or electronic form for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10.(b)(1)

(Ref.: 40 CFR 63.6655(a)(1), (2), (4), (d), (e), (f)(2), 63.6660, Subpart ZZZZ)

5.B.16 For Emission Point AA-010, the permittee shall demonstrate compliance with Condition 3.B.24 by installing a backpressure monitor that notifies the permittee when the high backpressure limit of the engine is approached.

The permittee shall keep records of any corrective action taken after the backpressure monitor has notified the permittee that the high backpressure limit of the engine is approached.

(Ref.: 40 CFR 60.4209(b), 60.4214(c), Subpart IIII)

5.B.17 For Emission Point AA-010, the permittee shall demonstrate compliance by following:

- a) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions.
- b) Change only those emission-related settings that are permitted by the manufacturer.

The engine shall certified to meet the standards of Condition 3.B.24, installed, and configured according to the manufacturer's emission-related specifications, except as permitted in 60.4211(g), in order to demonstrate compliance with Condition 3.B.24.

(Ref.: 40 CFR 60.4211(a), (c), Subpart IIII)

5.B.18 For Emission Point AA-010, if the permittee does not comply with Condition 5.B.17, then, the permittee will be required to keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee shall conduct an initial performance test to demonstrate compliance with the applicable emission standards within one (1) year of startup, or within one (1) year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within one (1) year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer.

(Ref.: 40 CFR 60.4211(g), 60.4211(g)(2), Subpart III)

5.B.19 For Emission Point AA-010, the permittee shall record and maintain records of the hours of operation and the sulfur content of the No. 2 fuel oil combusted.

(Ref.: Title V Operating Permit issued June 15, 2020; 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3).)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number(s)	Monitoring/Recordkeeping Requirement
AA-001 AA-002 AA-003	11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3)(c)(1).	5.C.1	CEMS Monitoring Requirement
		5.C.2	Reporting Requirement
		5.C.3	Reporting Requirement
	40 CFR 60.51Da, Subpart Da	5.C.4	Reporting Requirement
	40 CFR 60.334(j), Subpart GG	5.C.5	Reporting Requirement
	40 CFR 72-78	5.C.6	Reporting Requirement
AA-001 AA-002 AA-003 AA-004	11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3)(c)(1).	5.C.7	Annual Reporting Requirement
AA-004 AA-009 AA-010	PSD Permit to Construct issued May 31, 2001 Modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020	5.C.8	Semiannual Reporting Requirement
AA-004	11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3)(c)(1).	5.C.9	Reporting Requirement
AA-009	40 CFR 63.6640(b), Footnote 2 to Table 2d, Subpart ZZZZ	5.C.10	Reporting Requirement
AA-010	40 CFR 60.4214(c), Subpart III 11 Miss. Admin. Code Pt. 2, R. 2.2.6.3(A)(3)(c)(1).	5.C.11	Backpressure Reporting Requirement

5.C.1 For Emission Points AA-001, AA-002 and AA-003, the permittee shall submit semiannual reports summarizing the results of the PM/PM₁₀/PM_{2.5}, SO₂, NO_x, CO, and NMVOC emission rates in tpy based on a 12-month rolling total, as specified in Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3)(c)(1).)

5.C.2 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit a summary of operational data for each turbine that identifies the date, duration, and type of event for each startup, shutdown, and tuning session conducted during the semiannual period. This report shall also include the amount of time each turbine was operating while the SCR was not operating. The summary report shall be included with the semiannual report in accordance with Condition 5.A.4.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3)(c)(1).)

5.C.3 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit a stack test report for NMVOC emissions within 60 days of completing the test.

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

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3)(c)(1).)

5.C.4 For Emission Points AA-001, AA-002, and AA-003, the permittee is subject to and comply with all applicable reporting requirement of the Standards of Performance for Electric Utility Steam Generating Units (40 CFR 60, Subpart Da) and General Provisions (40 CFR 60, Subpart A).

(Ref.: 40 CFR 60.51Da, Subpart Da)

- 5.C.5 For Emission Points AA-001, AA-002, and AA-003, the permittee shall submit reports of excess emissions and monitor downtime semiannually for the NO_x CEMS in accordance with Condition 5.A.4. The report shall be in accordance with 40 CFR 60.7(c) and excess emissions and monitor downtime shall be reported as defined in 60.334(j)(1)(iii)(A) through(C).
(Ref.: 40 CFR 60.334(j), Subpart GG)
- 5.C.6 For Emission Points AA-001, AA-002, and AA-003, the permittee is subject to and shall comply with all applicable reporting requirements specified in the Acid Rain Program regulations.
(Ref.: 40 CFR 72-78)
- 5.C.7 For Emission Points AA-001, AA-002, AA-003, and AA-004, the permittee shall submit the results of the Visual Determination and/or VEE required by Condition 5.B.10 annually. The results can be submitted with the report due January 31st.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)
- 5.C.8 For Emission Points AA-004, AA-009, and AA-010, the permittee shall submit semiannual reports, in accordance with Condition 5.A.4, showing the hours of operation on a monthly basis and on a 12 month total
(Ref.: PSD Permit to Construct issued May 31, 2001 and modified June 13, 2005, September 7, 2011, May 24, 2012, and June 15, 2020)
- 5.C.9 For Emission Point AA-004, the permittee shall submit reports containing the information required by Conditions 5.B.12 and 5.B.13. The report shall be submitted in accordance with Condition 5.A.4.
(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3(A)(3)(c)(1).)

- 5.C.10 For Emission Point AA-009, the permittee shall report each instance in which the management practices were not met. These instances are deviations and must be reported within five (5) business days in accordance with Condition 5.A.5.

If the engine was operating during an emergency and it was not possible to shut down the engine to perform the management practices or if performing them on the required schedule posed an unacceptable risk under Federal, State, or local law at the time of the required scheduled maintenance activity, the management practices can be delayed until the emergency is over or the unacceptable risk has abated. The permittee shall report such a failure to complete the management practice in a timely manner and shall also document the specific conditions for which the management practices were delayed.

(Ref.: 40 CFR 63.6640(b), Footnote 2 to Table 2d, Subpart ZZZZ)

- 5.C.11 For Emission Point AA-010, the permittee shall keep records of any corrective action taken after the backpressure monitor has notified the permittee that the high backpressure limit of the engine is approached. The permittee shall include the record with the semiannual report specified in Condition 5.A.4.

(Ref.: 40 CFR 60.4214(c), Subpart IIII; 11 Miss. Admin. Code Pt. 2, R.

6.3(A)(3)(c)(1).)

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://www.ecfr.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.

SECTION 8. ACID RAIN REQUIREMENTS

- 8.1 The permittee shall comply with all requirements of the Phase II Acid Rain Permit attached as Appendix B of this permit. All conditions of the Phase II Acid Rain Permit are effective for the dates specified in the Acid Rain Permit; however, these conditions may be revised by the DEQ during the permitted period.

SECTION 9. CROSS STATE AIR POLLUTION RULE

9.1 Description of Cross-State Air Pollution Rule (CSAPR) Monitoring Provisions

The CSAPR subject units and the unit-specific monitoring provisions at this source are identified in the following Tables. These units are subject to the requirements for the CSAPR NO_x Ozone Season Trading Program.

Unit ID: Emission Points AA-001, AA-002, AA-003					
Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for SO ₂ monitoring) and 40 CFR part 75, subpart H (for NO _x monitoring)	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E	Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19	EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E
NO _x	X				
Heat Input		X			

9.2 The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.530 through 97.535. The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable CSAPR trading programs.

9.3 The permittee must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at

<http://www.epa.gov/airmarkets/emissions/monitoring-plans-part-75-sources>

9.4 The permittee that wants to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.535. The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.

9.5 The permittee that wants to use an alternative to any monitoring, recordkeeping, or reporting

requirement under 40 CFR 97.530 through 97.534 must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.535. The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on EPA website at

<http://www.epa.gov/airmarkets/emissions/monitoring-plans-part-75-sources>

- 9.6 The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.530 through 97.534, and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add to or change this unit's monitoring system description.
- 9.7 CSAPR NO_x Ozone Season Trading Program Requirements (40 CFR 97.506)
- a) Designated representative requirements - The permittee shall comply with the requirement to have a designated representative, and may have an alternate designated representative, in accordance with 40 CFR 97.513 through 97.518.
 - b) Emissions monitoring, reporting, and recordkeeping requirements.
 - 1) The permittee, and the designated representative, of each CSAPR NO_x Ozone Season source and each CSAPR NO_x Ozone Season unit at the source shall comply with the monitoring, reporting, and recordkeeping requirements of 40 CFR 97.530 (general requirements, including installation, certification, and data accounting, compliance deadlines, reporting data, prohibitions, and long-term cold storage), 97.531 (initial monitoring system certification and recertification procedures), 97.532 (monitoring system out-of-control periods), 97.533 (notifications concerning monitoring), 97.534 (recordkeeping and reporting, including monitoring plans, certification applications, quarterly reports, and compliance certification), and 97.535 (petitions for alternatives to monitoring, recordkeeping, or reporting requirements).
 - 2) The emissions data determined in accordance with 40 CFR 97.530 through 97.535 shall be used to calculate allocations of CSAPR NO_x Ozone Season allowances under 40 CFR 97.511(a)(2) and (b) and 97.512 and to determine compliance with the CSAPR NO_x Ozone Season emissions limitation and assurance provisions under paragraph (c) below, provided that, for each monitoring location from which mass emissions are reported, the mass emissions amount used in calculating such allocations and determining such compliance shall be the mass emissions amount for the monitoring location determined in accordance with 40 CFR 97.530 through 97.535 and rounded to the nearest ton, with any fraction of a ton less than 0.50 being deemed to be zero.
 - c) NO_x emissions requirements.

- 3) CSAPR NO_x Ozone Season emissions limitation.
 - (i) As of the allowance transfer deadline for a control period in a given year, the owners and operators of each CSAPR NO_x Ozone Season source and each CSAPR NO_x Ozone Season unit at the source shall hold, in the source's compliance account, CSAPR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.524(a) in an amount not less than the tons of total NO_x emissions for such control period from all CSAPR NO_x Ozone Season units at the source.
 - (ii) If total NO_x emissions during a control period in a given year from the CSAPR NO_x Ozone Season units at a CSAPR NO_x Ozone Season source are in excess of the CSAPR NO_x Ozone Season emissions limitation set forth in paragraph (c)(1)(i) above, then:
 - (A) The owners and operators of the source and each CSAPR NO_x Ozone Season unit at the source shall hold the CSAPR NO_x Ozone Season allowances required for deduction under 40 CFR 97.524(d); and
 - (B) The owners and operators of the source and each CSAPR NO_x Ozone Season unit at the source shall pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Clean Air Act, and each ton of such excess emissions and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBBB and the Clean Air Act.
- 4) CSAPR NO_x Ozone Season assurance provisions.
 - (i) If total NO_x emissions during a control period in a given year from all CSAPR NO_x Ozone Season units at CSAPR NO_x Ozone Season sources in the state (and Indian country within the borders of such state) exceed the state assurance level, then the owners and operators of such sources and units in each group of one or more sources and units having a common designated representative for such control period, where the common designated representative's share of such NO_x emissions during such control period exceeds the common designated representative's assurance level for the state and such control period, shall hold (in the assurance account established for the owners and operators of such group) CSAPR NO_x Ozone Season allowances available for deduction for such control period under 40 CFR 97.525(a) in an amount equal to two times the product (rounded to the nearest whole number), as determined by the Administrator in accordance with 40 CFR 97.525(b), of

multiplying—

- (A) The quotient of the amount by which the common designated representative's share of such NO_x emissions exceeds the common designated representative's assurance level divided by the sum of the amounts, determined for all common designated representatives for such sources and units in the state (and Indian country within the borders of such state) for such control period, by which each common designated representative's share of such NO_x emissions exceeds the respective common designated representative's assurance level; and
 - (B) The amount by which total NO_x emissions from all CSAPR NO_x Ozone Season units at CSAPR NO_x Ozone Season sources in the state and Indian country within the borders of such state) for such control period exceed the state assurance level.
- (ii) The permittee shall hold the CSAPR NO_x Ozone Season allowances required under paragraph 93.7 (c)(2)(i) above, as of midnight of November 1 (if it is a business day), or midnight of the first business day thereafter (if November 1 is not a business day), immediately after such control period.
 - (iii) Total NO_x emissions from all CSAPR NO_x Ozone Season units at CSAPR NO_x Ozone Season sources in the state (and Indian country within the borders of such state) during a control period in a given year exceed the state assurance level if such total NO_x emissions exceed the sum, for such control period, of the State NO_x Ozone Season trading budget under 40 CFR 97.510(a) and the state's variability limit under 40 CFR 97.510(b).
 - (iv) It shall not be a violation of 40 CFR part 97, subpart BBBBBB or of the Clean Air Act if total NO_x emissions from all CSAPR NO_x Ozone Season units at CSAPR NO_x Ozone Season sources in the state (and Indian country within the borders of such state) during a control period exceed the state assurance level or if a common designated representative's share of total NO_x emissions from the CSAPR NO_x Ozone Season units at CSAPR NO_x Ozone Season sources in the state (and Indian country within the borders of such state) during a control period exceeds the common designated representative's assurance level.
 - (v) To the extent the permittee fails to hold CSAPR NO_x Ozone Season allowances for a control period in a given year in accordance with paragraphs 9.7(c)(2)(i) through (iii) above,

- (A) The permittee shall pay any fine, penalty, or assessment or comply with any other remedy imposed under the Clean Air Act; and
 - (B) Each CSAPR NO_x Ozone Season allowance that the permittee fails to hold for such control period in accordance with paragraphs 9.7(c)(2)(i) through (iii) above and each day of such control period shall constitute a separate violation of 40 CFR part 97, subpart BBBBB and the Clean Air Act.
- 5) Compliance periods.
- (i) A CSAPR NO_x Ozone Season unit shall be subject to the requirements under paragraph 9.7(c)(1) above for the control period starting on the later of May 1, 2015 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
 - (ii) A CSAPR NO_x Ozone Season unit shall be subject to the requirements under paragraph (c)(2) above for the control period starting on the later of May 1, 2017 or the deadline for meeting the unit's monitor certification requirements under 40 CFR 97.530(b) and for each control period thereafter.
- 6) Vintage of allowances held for compliance.
- (i) A CSAPR NO_x Ozone Season allowance held for compliance with the requirements under paragraph 9.7(c)(1)(i) above for a control period in a given year must be a CSAPR NO_x Ozone Season allowance that was allocated for such control period or a control period in a prior year.
 - (ii) A CSAPR NO_x Ozone Season allowance held for compliance with the requirements under paragraphs 9.7(c)(1)(ii)(A) and (2)(i) through (iii) above for a control period in a given year must be a CSAPR NO_x Ozone Season allowance that was allocated for a control period in a prior year or the control period in the given year or in the immediately following year.
- 7) Allowance Management System requirements. Each CSAPR NO_x Ozone Season allowance shall be held in, deducted from, or transferred into, out of, or between Allowance Management System accounts in accordance with 40 CFR part 97, subpart BBBBB.
- 8) Limited authorization. A CSAPR NO_x Ozone Season allowance is a limited authorization to emit one ton of NO_x during the control period in one year. Such authorization is limited in its use and duration as follows:

- (i) Such authorization shall only be used in accordance with the CSAPR NO_x Ozone Season Trading Program; and
 - (ii) Notwithstanding any other provision of 40 CFR part 97, subpart BBBBB, the Administrator has the authority to terminate or limit the use and duration of such authorization to the extent the Administrator determines is necessary or appropriate to implement any provision of the Clean Air Act.
- 9) Property right. A CSAPR NO_x Ozone Season allowance does not constitute a property right.
- d) Title V permit revision requirements.
 - 10) No title V permit revision shall be required for any allocation, holding, deduction, or transfer of CSAPR NO_x Ozone Season allowances in accordance with 40 CFR part 97, subpart BBBBB.
 - 11) This permit incorporates the CSAPR emissions monitoring, recordkeeping and reporting requirements pursuant to 40 CFR 97.530 through 97.535, and the requirements for a continuous emission monitoring system (pursuant to 40 CFR part 75, subparts B and H), an excepted monitoring system (pursuant to 40 CFR part 75, appendices D and E), a low mass emissions excepted monitoring methodology (pursuant to 40 CFR 75.19), and an alternative monitoring system (pursuant to 40 CFR part 75, subpart E). Therefore, the Description of CSAPR Monitoring Provisions table for units identified in this permit may be added to, or changed, in this title V permit using once permit modification procedures in accordance with 40 CFR 97.506(d)(2) and 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B).
- e) Additional recordkeeping and reporting requirements.
 - 12) Unless otherwise provided, the permittee of each CSAPR NO_x Ozone Season source and each CSAPR NO_x Ozone Season unit at the source shall keep on site at the source each of the following documents (in hardcopy or electronic format) for a period of 5 years from the date the document is created. This period may be extended for cause, at any time before the end of 5 years, in writing by the Administrator.
 - (i) The certificate of representation under 40 CFR 97.516 for the designated representative for the source and each CSAPR NO_x Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such certificate of representation and documents are

superseded because of the submission of a new certificate of representation under 40 CFR 97.516 changing the designated representative.

- (ii) All emissions monitoring information, in accordance with 40 CFR part 97, subpart BBBBB.
- (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under, or to demonstrate compliance with the requirements of, the CSAPR NO_x Ozone Season Trading Program.

13) The designated representative of a CSAPR NO_x Ozone Season source and each CSAPR NO_x Ozone Season unit at the source shall make all submissions required under the CSAPR NO_x Ozone Season Trading Program, except as provided in 40 CFR 97.518. This requirement does not change, create an exemption from, or otherwise affect the responsible official submission requirements under a title V operating permit program in 40 CFR parts 70 and 71.

f) Liability.

14) Any provision of the CSAPR NO_x Ozone Season Trading Program that applies to a CSAPR NO_x Ozone Season source or the designated representative of a CSAPR NO_x Ozone Season source shall also apply to the permittee of such source and of the CSAPR NO_x Ozone Season units at the source.

15) Any provision of the CSAPR NO_x Ozone Season Trading Program that applies to a CSAPR NO_x Ozone Season unit or the designated representative of a CSAPR NO_x Ozone Season unit shall also apply to the permittee of such unit.

- g) Effect on other authorities - No provision of the CSAPR NO_x Ozone Season Trading Program or exemption under 40 CFR 97.505 shall be construed as exempting or excluding the permittee, and the designated representative, of a CSAPR NO_x Ozone Season source or CSAPR NO_x Ozone Season unit from compliance with any other provision of the applicable, approved state implementation plan, a federally enforceable permit, or the Clean Air Act.

Effect on units in Indian country. Notwithstanding the provisions of paragraphs (a) through (g) above, paragraphs (a) through (g) shall be deemed not to impose any requirements on any source or unit, or any owner, operator, or designated representative with regards to any source or unit, in Indian country within the borders of the state.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 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	Tpy
CSAPRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

PHASE II ACID RAIN PERMIT

PHASE II ACID RAIN PERMIT

Issued to: TVA Magnolia Combined Cycle
Operated by: Tennessee Valley Authority
ORIS code: 55451
Effective: June 15, 2020 through May 31, 2025

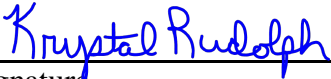
Summary of Previous Actions:

This page will be replaced to document new actions each time a new action is taken by the Mississippi Department of Environmental Quality.

(1) Draft permit for public and EPA comment.	November 2, 2001
(2) Permit finalized and issued	January 2, 2002
(3) Draft permit for public comment.	January 17, 2007
(4) Draft permit for EPA comment.	February 27, 2007
(5) Permit finalized and issued.	May 1, 2007
(6) Draft permit for public and EPA comment.	April 28, 2020
(7) Permit finalized and issued.	June 15, 2020

Present Action:

(1) Permit finalized and issued	June 15, 2020
---------------------------------	---------------



Signature

June 15, 2020

Date

Krystal Rudolph, P.E.
Chief, Environmental Permits Division
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225-2261
Telephone (601) 961-5171
Fax (601) 961-5742

PHASE II ACID RAIN PERMIT

Issued to: TVA Magnolia Combined Cycle
Operated by: Tennessee Valley Authority
ORIS code: 55451
Effective: June 15, 2020 through May 31, 2025

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 sources 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 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, 11 Miss. Admin. Code Pt. 2, Ch. 6, and the State of Mississippi Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act, 11 Miss. Admin. Code Pt. 2, Ch. 7.

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

		2020	2021	2022	2023	2024
AA-001 AA-002 AA-003	SO ₂ allowances, under Table 2 of 40 CFR Part 73.	NA	NA	NA	NA	NA
	NO _x limit	NA				

3) COMMENTS, NOTES AND JUSTIFICATIONS:

All affected units are natural gas 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 73, Tables 2, 3, or 4, and have not been allocated any SO₂ allowances.

4) **PHASE II PERMIT APPLICATION:**

Attached

