Special Conditions

Permit Number 6269 and PSDTX64

1. This permit covers only those sources of emissions listed in the attached table entitled “Emission Sources - Maximum Allowable Emission Rates,” and those sources are limited to the emission limits and other conditions specified in that attached table.

2. The source will be constructed in accordance with the Prevention of Significant Deterioration and supportive facts submitted to the Environmental Protection Agency (EPA) on November 4, 1977.

Federal Applicability

3. These facilities shall comply with applicable requirements of the EPA regulations on Standards of Performance for New Stationary Sources, Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60):

3. Subpart A: General Provisions.

3. Subpart D: Standards of Performance for Fossil-Fuel-Fired Steam Generators for which Construction is Commenced after Aug 17, 1971

3. If any condition of this permit is more stringent than the regulations so incorporated, then for the purposes of complying with this permit, the permit shall govern and be the standard by which compliance shall be demonstrated.

4. These facilities shall comply with applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants, Title 40 Code of Federal Regulations Part 63 (40 CFR art 63):

4. Subpart A: General Conditions

4. Subpart UUUUU: National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units

Emission Standards

5. Opacity of emissions from the boiler stack shall not exceed 20 percent averaged over a six minute period, except as described in Title 30 Texas Administrative Code (30 TAC) § 111.111(a)(1)(E).

6. Upon request by the Executive Director of the Texas Commission on Environmental Quality (TCEQ), or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel(s) utilized in this facility or shall allow air pollution control agency representatives to obtain a sample for analysis.

7. Disposal of ash must be accomplished in a manner which will minimize the ash from becoming airborne.

Cold Solvent Degreaser Operating Conditions [Emission Point No. (EPN): 13]

8. The unit shall be equipped with a cover which is closed whenever parts are not being handled in the cleaner.

9. A permanent label summarizing the operating requirements in Special Condition No. 10 of this paragraph shall be attached to the cleaner in a conspicuous location near the operator.

10. The operating procedures shall be as follows:

10. Waste solvent shall not be disposed of or transferred to another party such that the waste solvent can evaporate into the atmosphere. Waste solvents shall be stored only in covered containers.

10. The degreaser cover shall be kept closed whenever parts are not being handled in the cleaner.

10. Porous or absorbent materials, such as cloth, leather, wood, or rope shall not be degreased.

New Fly Ash Silo Operating Conditions (EPN: 2)

11. Operating conditions for the new fly ash silo constructed as represented in the amendment application dated July 2, 2003 shall be as follows:

11. The throughput for the new silo shall be limited to 400 tons per day.

11. A visible and/or audible warning device shall be installed on the new fly ash silo to warn operators that the silo is full so that it will not be overloaded at any time. A visible and/or audible warning device shall be installed in conjunction with scales at the loading facility to warn operators during loading operations that the truck trailer is full so that it will not be overloaded at any time.

11. Spillage of fly ash used in the silo unloading shall be cleaned up or controlled to maintain compliance with TCEQ rules and regulations.

Addition of Soda Ash to Lignite

12. Soda ash, sodium carbonate (Na_2CO_3), may be added to the lignite fuel up to 0.08 percent to maintain Electrostatic Precipitator performance via the typical stages between the delivery and the burning of lignite. Those stages include the lignite handing area, silos, bunkers, conveyors and pulverizers. The soda ash must be of a composition in which particulate matter is maintained below nuisance levels.

Continuous Demonstration of Compliance

13. The holder of this permit shall install, calibrate, and maintain a continuous opacity-monitoring system (COMS) or Particulate Matter (PM) CEMS to measure PM from the Boiler (EPN: 1).

14. In order to demonstrate continuous compliance with the SO_2 emission limit as required 40 CFR Part 60, Subpart D, the holder of this permit shall measure and record SO_2 emissions using one of the methods specified in 40 CFR § 75.11(a).

15. Data from the continuous emission monitors for flow, SO_2, NO_x, continuous opacity monitors, or PM CEMS required by 40 CFR Part 60 and 40 CFR Part 75 may be used to determine compliance with the SO_2, NO_x, and opacity/PM limits in this permit.

Maintenance, Startup, and Shutdown (MSS)

16. This permit authorizes the emissions from the planned MSS activities listed in Attachment A, Attachment B, or the MAERT attached to this permit. Attachment A identifies the inherently low emitting (ILE) planned maintenance activities that this permit authorizes to be performed. Attachment B identifies the planned maintenance activities that are non-ILE planned maintenance activities that this permit authorizes to be performed.

17. When a planned maintenance activity identified in Attachment B is associated with a volatile organic compound (VOC) liquid storage facility and may result in VOC emissions from that facility, the permit holder shall not open that facility to the atmosphere in connection with the planned maintenance activity until the VOC liquids are removed from that facility to the maximum extent practicable.

18. No vacuum pump on a vacuum truck that is used to move solids (such as ash) during planned maintenance activities shall be operated unless the vacuum system exhaust is controlled by a filtering system.

19. The holder of this permit shall minimize emissions during planned MSS activities by operating the facility and associated air pollution control equipment in accordance with good air pollution control practices, safe operating practices, and protection of the facility and associated air pollution control equipment.

20. Emissions during planned startup and shutdown activities will be minimized by limiting the duration of operation in planned startup and shutdown modes as follows:

20. A planned startup of the boilers begins when fans are placed in service for the initiating of combustion and is complete when the boiler has achieved the lowest sustainable load on lignite for at least 60 consecutive minutes while coal is being fired. Normal startup shall not exceed 2,880 minutes. An extended startup is allowed for greater than 2,880 minutes after a major outage, but the cumulative annual minutes of extended startups shall not exceed 18,000 minutes.

20. A planned shutdown of the boilers begins when the boiler has dropped below the lowest sustainable load for at least 30 consecutive minutes and is complete 24 hours after combustion has ceased. Each shutdown shall not exceed 2,880 minutes.

21. Compliance with the emissions limits for planned MSS activities identified in the MAERT attached to this permit may be demonstrated as follows.

21. For each pollutant emitted during ILE planned maintenance activities, the permit holder shall annually confirm the continued validity of the estimated potential to emit represented in the permit application for all ILE planned maintenance activities. The total emissions from all ILE planned maintenance activities (See Attachment A) shall be considered to be no more than the estimated potential to emit for those activities that are represented in the permit application.

21. For each pollutant emitted during non-ILE planned maintenance activities (See Attachment B) whose emissions are measured using a continuous emission monitoring system (CEMS), as per Special Condition No. 22A, the permit holder shall do the following for each calendar month.

21. Compare the pollutant's short-term (hourly) emissions during planned maintenance activities as measured by the CEMS to the applicable short-term planned MSS emissions limit in the MAERT.

21. For each pollutant emitted during non-ILE planned maintenance activities (See Attachment B) whose emissions occur through a stack, but are not measured using CEMS, as per Special Condition 22A, the permit holder shall do the following for each calendar month.

21. Determine the total emissions of the pollutant through the stack that result from such non-ILE planned maintenance activities in accordance with Special Condition No. 22B.

21. For each pollutant emitted during non-ILE planned maintenance activities (see Attachment B) whose emissions do not occur through a stack, the permit holder shall do the following for each calendar month.

21. Determine the total emissions of the pollutant from such non-ILE planned maintenance activities in accordance with Special Condition No. 22B.

21. Once monthly emissions have been determined in accordance with Special Condition No. 21D(1) for 12 months after the MSS permit amendment has been issued, the permit holder shall compare the sum of the rolling 12-month emissions for the pollutant for all non-ILE planned maintenance activities to the annual EPN MSS-FUG emissions limit for the pollutant in the MAERT.

22. The permit holder shall determine the emissions during planned MSS activities for use in Special Condition No. 21 as follows.

22. For each pollutant whose emissions during normal facility operations are measured with a CEMS that has been certified to measure the pollutant's emissions over the entire range of a planned MSS activity, the permit holder shall

measure the emissions of the pollutant during the planned MSS activity using the CEMS.

22. For each pollutant not described in Special Condition No. 22A, the permit holder shall calculate the pollutant's emissions during all occurrences of each type of planned MSS activity for each calendar month using the frequency of the planned MSS activity identified in work orders or equivalent records and the emissions of the pollutant during the planned MSS activity as represented in the planned MSS permit application. In lieu of using the emissions of the pollutant during the planned MSS activity as represented in the planned MSS permit application to calculate such emissions, the permit holder may determine the emissions of the pollutant during the planned MSS activity using an appropriate method, including but not limited to, any of the methods described in paragraphs 1 through 4 below, provided that the permit holder maintains appropriate records supporting such determination:

22. Use of emission factor(s), facility-specific parameter(s), and/or engineering knowledge of the facility's operations.

22. Use of emissions data measured (by a CEMS or during emissions testing) during the same type of planned MSS activity occurring at or on a similar facility, and correlation of that data with the facility's relevant operating parameters, including, but not limited to, electric load, temperature, fuel input, and fuel sulfur content.

22. Use of emissions testing data collected during a planned MSS activity occurring at or on the facility, and correlation of that data with the facility's relevant operating parameters, including, but not limited to, electric load, temperature, fuel input, and fuel sulfur content.

22. Use of parametric monitoring system data applicable to the facility.

23. With the exception of the emission limits in the MAERT attached to this permit, the permit conditions relating to planned MSS activities do not become effective until 180 days after issuance of the permit amendment that added such conditions.

24. Opacity greater than 20 percent from the boiler is authorized when the permit holder complies with the planned MSS duration limitations in Special Condition No. 20 and the applicable work practices identified below.

24. Opacity during planned startup and shutdown activities shall be minimized by employing the following work practices: During planned startup and shutdown activities, the permit holder shall comply with the parts of the boiler and ESP manufacturer's operating procedures or the procedures in the permittee's written Standard Operating Procedures manual that impact opacity, and shall operate the boiler and ESP in a manner consistent with those procedures to minimize opacity by placing the ESP into service as soon as practical during planned startups or removing the ESP from service as late as possible during planned shutdowns. The boiler and ESP manufacturer's operating procedures or written Standard Operating Procedure manual shall be located on-site and available to the TCEQ regional investigator.

24. Periods of opacity greater than 20 percent from planned online and offline maintenance activities identified in Attachment A or B are authorized for no more than 600 minutes in a calendar year.

24. The permit holder shall keep records to identify periods of planned MSS, the opacity measured by the continuous opacity monitoring system (COMS) for the duration of the planned startups and shutdowns, and the planned maintenance activities identified in Attachments A or B, and the work practices in Special Condition No. 24A followed during the planned MSS activities for the purpose of demonstrating compliance with this permit special condition.

24. For periods of MSS other than those subject to Paragraphs A - C of this condition, 30 TAC § 111.111, 111.153, and Chapter 101, Subchapter F apply.

Additional Authorizations

25. The following facilities are authorized by Standard Permit.

Activity	Permit Number
Pollution Control Project – low NO_x burners	49226
Pollution Control Project – test of a selective non-catalytic reduction (SNCR)	56601
Pollution Control Project - dual flue gas conditioning (FGC) system	76547
Pollution Control Project - Mercury	102679
Pollution Control Project - Mercury	110729

Recordkeeping

26. The following information shall be maintained by the holder of this permit in a form suitable for inspection for a period of five years after collection and shall be made available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction:

26. The CEMS data of SO_2 emissions from EPNs: 1 to demonstrate compliance with the emission rates listed in the MAERT and 40 CFR Part 60, Subpart D.

26. The COMS or PM CEMS data to demonstrate compliance with the opacity PM limits listed in Special Condition Nos. 3B and 5.

26. Raw data files of all CEMS/COMS data including calibration checks, adjustments, maintenance, repair, and/or replacement performed on these systems in a permanent form suitable for inspection.

ATTACHMENT A

Permit Number 6269

Inherently Low Emitting (ILE) Planned Maintenance Activities						
Planned Maintenance Activity	Emissions					
	NO_x	CO	VOC	PM	SO_2	NH_3/urea
Water-based washing			X			
Miscellaneous particulate filter maintenance[1]				X		
Degassing for maintenance of storage vessels storing materials with a vapor pressure <0.5 psia or materials with a vapor pressure >0.5 psia that does not require clearing of the vessels to allow for entry of personnel			X			
Boiler general maintenance[2]				X		
Management of sludge from pits, ponds, sumps, and water conveyances[3]			X			
Organic chemical usage			X			
Inspection, repair, replacement, adjusting, testing, and calibration of analytical equipment, process instruments including sight glasses, meters, gauges, and CEMS.	X	X	X	X	X	
Deslagging of boiler[4]	X	X	X	X		
Material handling system maintenance[5]				X		
Small equipment and fugitive component repair/replacement in VOC and NH_3 service[6]			X			X

Date: August 12, 2014

[1] Includes, but is not limited to, baghouse filters, ash silo/transfer filters, coal handling filters, process-related building air filters, and combustion turbine air intake filters.

[2] Includes pre-heater basket handling and maintenance, refractory change-out, fan maintenance and balancing, damper, air heater, and soot blower maintenance, and any other general boiler maintenance that does not exceed the worst-case emissions representation in the application.

[3] Includes, but is not limited to, management by vacuum truck/dewatering of materials in open pits and ponds, sumps, tanks, and other closed or open vessels. Materials managed include water and sludge mixtures containing miscellaneous VOCs such as diesel, lube oil, and other waste oils.

[4] Includes, but is not limited to, explosive blasting, clinker shooting, and other boiler deslagging activities; does not include dry abrasive blasting that may occur in boilers.

[5] Material handling system equipment includes, but is not limited to, silos, transport systems, coal bunkers, coal crushing equipment, coal handling, nuvafeeders, hoppers, FGD sludge handling system. Materials handled include coal, ash, limestone, gypsum, and sorbents.

[6] Includes, but is not limited to, (i) repair/replacement of pumps, compressors, valves, pipes, flanges, transport lines, filters and screens in natural gas, fuel oil, diesel oil, ammonia, lube oil, and gasoline service, (ii) vehicle and mobile equipment maintenance that may involve small VOC emissions, such as oil changes, transmission service, and hydraulic system service, and (iii) off-line NO_x control device maintenance (including maintenance of the anhydrous ammonia systems and aqueous ammonia systems associated with SCR systems and SNCR systems).

ATTACHMENT B

Permit Number 6269

Non-ILE Planned Maintenance Activities							
Planned Maintenance Activity	EPN	Emissions					
		NO_x	CO	VOC	PM	SO_2	NH_3/urea
Combustion optimization[7]	1	X	X	X	X	X	
Vacuum truck solids loading[8]	MSS-FUG				X		
Vacuum truck solids unloading[8]	MSS-FUG				X		
Degassing for maintenance of storage vessels storing gasoline or other material with vapor pressure >0.5 psia that requires clearing of the vessels to allow for entry of personnel	MSS-FUG						X
Flue Gas Conditioning System maintenance	1						X
Use of fans during maintenance - unit offline	1				X		X

Date: August 12, 2014

[7] Includes, but is not limited to (i) leak and operability checks, (ii) balancing, and (iii) tuning activities that occur during seasonal tuning or after the completion of initial construction, a burner change-out, a major repair, maintenance to a burner, or other similar circumstances.

[8] Includes site-wide solids vacuuming operations (e.g. baghouse, ESP, ducts, furnace, loop seals, stripper coolers, and airlocks).